



East Cambridgeshire
District Council

Strategic Environmental Assessment Environmental Report

December 2021

On behalf of Isleham Parish Council

Date of assessment:	06 December 2021
Date/ version of neighbourhood development plan to which Scoping Report applies:	Draft (Reg. 14) Isleham Neighbourhood Plan

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Overview

Neighbourhood Development Plan to which this Scoping Report applies:

Isleham Neighbourhood Plan

Version/ date of Neighbourhood Development Plan to which this Scoping Report applies:

Draft (Reg. 14) Isleham Neighbourhood Plan

Neighbourhood area to which the Neighbourhood Development Plan applies:

Isleham Neighbourhood Area

Qualifying Body within the neighbourhood area:

Isleham Parish Council

Acronyms

DEFRA	Department for Environment, Food & Rural Affairs
ECJ	European Court of Justice
ECDC	East Cambridgeshire District Council
EIA	Environmental Impact Assessment
EU	European Union
ha	Hectares
HRA	Habitats Regulations Assessment
INP	Isleham Neighbourhood Plan
IRZ	Impact Risk Zone
NCA	National Character Area
NDP	Neighbourhood Development Plan
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
NSN	National Site Network
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest

1. Introduction

- 1.1. The subject of this scoping report is Draft (Reg. 14) Isleham Neighbourhood Plan (INP). The INP has recently completed the Regulation 14 pre-submission consultation stage of its preparation, with consultation taking place from June to September 2021.
- 1.2. The INP is being prepared by Isleham Parish Council, the 'qualifying body' for the purposes of neighbourhood planning.
- 1.3. In June 2021, consulted the statutory bodies on a *SEA Scoping Report: Isleham Neighbourhood Plan (June 2021)*. The Scoping Report included a screening assessment of the draft INP.
- 1.4. From the initial screening assessment, East Cambridgeshire District Council (ECDC) concluded that the Isleham Neighbourhood Development Plan (INP):
 - **requires** a full *Strategic Environmental Assessment* (SEA) (*screened in*); and
 - **does not require** a full *Habitats Regulations Assessment* (HRA) (*screened out*).
- 1.5. ECDC reached these conclusions following assessment of the plan's potential for likely significant effects on the environment. ECDC discussed with Isleham Parish Council its findings that the INP be screened in for SEA. The initial screening assessments and reasons for the screening determination are incorporate into this Environmental Report at section 4.

Purpose and Content of Environmental Report

- 1.6. The purpose of this Environmental Report is to document the Strategic Environmental Assessment of the draft INP. Preparation of the Environmental Report has been an iterative process, involving ongoing engagement with the statutory consultation bodies and Isleham Parish Council. It will inform the continued preparation of the draft INP, and is expected to be submitted alongside the INP at the Regulation 16 stage (*Publicising a plan proposal*).
- 1.7. Following this introductory section, section 2 describes the SEA methodology. Section 3 provides key information about the Neighbourhood Plan and Neighbourhood Area, including an outline of the content and objectives of the INP, its relationship with other relevant plans and programmes including the East Cambridgeshire Local Plan 2015, and relevant environmental characteristics and issues relating to the Isleham Neighbourhood Area.
- 1.8. Section 4 provides assessment of the INP against various SEA themes to identify the likelihood of significant effects on the environment, drawing on the environmental constraints and characteristics identified in section 3.
- 1.9. Section 5 appraises the INP and alternative policy options against an SEA Framework for the purpose of identifying measures to reduce, prevent or avoid adverse effects on the environment. Section 5 also provides indicators and targets for monitoring the performance of the INP.
- 1.10. Section 6 provides a non-technical summary of the Environmental Report's conclusions.

Statutory requirements of Environmental Report

- 1.11. To meet the requirements of Schedule 2 to the *SEA Regulations 2004*¹ the Environmental Report must contain certain information. Table 1 sets out the required information and indicates the relevant section of the Environmental Report where the information can be found.

¹ <https://www.legislation.gov.uk/ukxi/2004/1633/schedule/2/made>

TABLE 1: HOW THE ENVIRONMENTAL REPORT MEETS REQUIREMENTS OF SEA REGULATIONS

SEA Regulations 2004 required information	Report section
An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.	Section 3
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Section 3
The environmental characteristics of areas likely to be significantly affected.	Section 3
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(1) and the Habitats Directive.	Section 3
The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Section 3
<p>The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as—</p> <p>(a) biodiversity;</p> <p>(b) population;</p> <p>(c) human health;</p> <p>(d) fauna;</p> <p>(e) flora;</p> <p>(f) soil;</p> <p>(g) water;</p> <p>(h) air;</p> <p>(i) climatic factors;</p> <p>(j) material assets;</p> <p>(k) cultural heritage, including architectural and archaeological heritage;</p> <p>(l) landscape; and</p> <p>(m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).</p>	Initial screening assessment at Section 4, and assessment of reasonable alternatives against the SEA Framework in Section 5.
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Section 5
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Section 5
A description of the measures envisaged concerning monitoring (in accordance with regulation 17).	Section 5
A non-technical summary of the Strategic Environmental Assessment process and findings.	Section 6

Overview of requirements of the SEA Regulations in regard to Neighbourhood Plans

- 1.12. A Neighbourhood Plan or Neighbourhood Development Plan (NDP) must meet the 'basic conditions' set out in 8(2) of Schedule 4B of the Town and Country Planning Act 1990.
- 1.13. As described in the government's planning practice guidance², basic condition 'f', requires that:
the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
- 1.14. This can include a range of EU directives *which have been incorporated into UK law*. Of particular significance are:
- **Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment** (the Strategic Environmental Assessment Directive), transposed into UK law by The Environmental Assessment of Plans and Programmes Regulations 2004; and
 - **Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora**, which was initially transposed into UK law by The Conservation (Natural Habitats, &c.) Regulations 1994 with various amendments consolidated by The Conservation of Habitats and Species Regulations 2018.
- 1.15. In addition, basic condition 'g' requires:
prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).
- 1.16. Notably, this includes demonstrating that the making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the *Conservation of Habitats and Species Regulations 2017*, which set out the habitat regulation assessment process for land use plans, including consideration of the effect on habitats sites.
- 1.17. Following the United Kingdom's withdrawal from the European Union (i.e. *Brexit*), EU law no longer has supremacy over British laws. Whilst initially introduced by EU Directives, the processes for SEA and HRA have been transposed into UK law, namely The *Environmental Assessment of Plans and Programmes Regulations 2004 (as amended)* and the *Conservation of Habitats and Species Regulations 2017 (as amended)*.
- 1.18. In light of Brexit, to enable the continued operation of the HRA processes *The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019*³ made a number of changes to the 2017 Regulations. Most of these changes involved transferring functions from the European Commission to the appropriate authorities in England and Wales, with all other processes or terms in the 2017 Regulations remaining unchanged and existing guidance remaining relevant. The obligations of competent authorities (i.e. ECDC) for the protection of sites or species do not change.
- 1.19. Special Areas of Conservation (SACs) were originally designated under the Habitats Directive and target particular habitats (Annex I) and/or species (Annex II) identified as being of European importance. Special Protection Areas (SPAs) are classified under the European

² https://www.gov.uk/guidance/neighbourhood-planning--2?mc_cid=e09f0934ad&mc_eid=c5e5a6ab4a#basic-conditions-for-neighbourhood-plan-to-referendum

³ <https://www.legislation.gov.uk/ukxi/2019/579/contents/made>

Council Directive “on the conservation of wild birds” (79/409/EEC; ‘Birds Directive’) for the protection of wild birds and their habitats.

- 1.20. SPAs and SACs in the UK no longer form part of the EU’s *Natura 2000 ecological network*. The 2019 Regulations have created a ‘national site network’ on land and at sea, including both the inshore and offshore marine areas in the UK, and includes existing SPAs and SACs.
- 1.21. Ramsar sites are designated wetlands of international importance. Ramsar sites do not form part of the new national site network. Many Ramsar sites overlap with SPAs and SACs, and are designated for the same or different species and habitats. All Ramsar sites remain protected in the same way as SPAs and SACs.
- 1.22. This report uses *European site* when referring collectively to SPAs, SACs, and Ramsar sites.
- 1.23. In general terms, a NDP may require full SEA following screening, where its policies and proposals are likely to result in significant effects on the environment, particularly where such effects have not already been considered and dealt with, such as through a Sustainability Appraisal (SA) (incorporating SEA) of a Local Plan.
- 1.24. In the context of neighbourhood planning, following screening, should a NDP be deemed likely to result in a significant impact occurring on a protected European Site as a result of the plan’s implementation, the HRA proceeds to Appropriate Assessment.
- 1.25. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any European site designated for its nature conservation importance.
- 1.26. The National Planning Policy Framework (NPPF) also expects candidate SACs, potential SPAs and Ramsar sites to be included within the assessment.

Local Planning Authority (ECDC)

- 1.27. ECDC, as local planning authority is ultimately responsible for ensuring that the SEA requirements have been met prior to the Neighbourhood Plan being made. ECDC is best placed to make a screening determination and prepare the scoping report and Environmental Report, given its access to environmental information and understanding of strategic-level planning issues relating to the Neighbourhood Area, East Cambridgeshire district, and surrounding area.
- 1.28. As per the requirements of Regulation 9⁴, ECDC is responsible for preparing a *Determination Statement*. The Determination Statement forms a Submission Document for the purposes of neighbourhood planning⁵. ECDC will prepare and publish its Determination Statement in advance of the INP’s submission.

Qualifying Body (Isleham Parish Council)

- 1.29. Isleham Parish Council is the Qualifying Body for the Isleham Neighbourhood Area (which is coterminous with the parish boundary). Only Isleham Parish Council has the legal right to prepare a Neighbourhood Plan for the Isleham Neighbourhood Area.
- 1.30. It is expected that Isleham Parish Council will ensure the INP reflects the findings and recommendations of the SEA.

⁴ Environmental Assessment of Plans and Programmes Regulations 2004

⁵ As required by The Neighbourhood Planning (General) Regulations 2012 (as amended) (reg. 15(e)(ii))

Statutory Bodies

- 1.31. For the purposes of SEA, the statutory bodies are executive non-departmental public bodies with responsibilities for managing the environment on government's behalf, including:
- Environment Agency
 - Historic England
 - Natural England
- 1.32. For the purpose of SEA, the statutory bodies are required to review and make representations when requested.

Responses to Scoping Report Consultation (June to August 2021)

- 1.33. *Scoping* is the process of agreeing the scope and level of detail of the information to go in an *Environmental Report*. The outcome of scoping is an agreed evidence base and SEA 'framework' of objectives for the assessment of a Neighbourhood Plan. It is important that the scoping report provides relevant information as the successful examination of the Neighbourhood Plan can depend on it.
- 1.34. The scope of the SEA must be proportionate. ECDC undertook an initial screening assessment which considered a wide range of environmental themes, policy matters, designations and constraints.
- 1.35. Through the initial screening exercise, ECDC was unable to rule out likely significant effects on the environment as a result of implementation of the INP. ECDC prepared a Scoping Report which set out the findings of its screening assessment and identified the scope of the SEA.
- 1.36. The SEA Regulations require that the consultation bodies be given not less than five weeks to comment on the scope of the assessment. From 29 June to 03 August 2021, ECDC consulted the statutory bodies on the Scoping Report. A full transcript of comments received during consultation on the Scoping Report is provided in Appendix 1.

Environment Agency

- 1.37. In summary, through its response, the Environment Agency confirm the scope of the SEA is 'generally acceptable'. In addition, Environment Agency provided the following observations and recommendations, specifically in relation to the INP's proposed site allocation:
- The proposed site allocation (ISL7) is located above a Principal Aquifer and within Source Protection Zone 1 (SPZ).
 - The 'reasonable alternative sites' located within Areas of Search 1-5 are within Flood Zone 1 and located above the Principal Aquifer.
 - The Environment Agency's groundwater protection hierarchy should be incorporated into plans and when proposing new development.
 - Proposals for new development or redevelopment should promote sustainable design, incorporate mitigation measures, account for climate change, and protect and enhance the water environment.
 - The assessment of contamination should be in line with Land Contamination Risk Management (LCRM) guidance and undertaken by suitably competent persons. Development proposals should only be permitted where it is demonstrated that any identified contamination is capable of being appropriately remediated or rendered innocuous to make the site suitable for the proposed end use.
 - It is likely to object to activities that could damage or diminish groundwater resources. Certain development proposals within an SPZ1 (inner protection zone), or the protection zone of a private potable groundwater supply will result in an 'Objection in Principle' under the Environment Agency's Groundwater Protection Policy.

- The developer should address risks to controlled waters from contamination following the requirements of the National Planning Policy Framework and the Environment Agency Guiding Principles for Land Contamination.
- It supports the Government's expectation that SuDS be provided in new developments. Infiltration SuDS need to meet the criteria in Groundwater Protection Position Statements G1 and G9 to G13.

Historic England

- 1.38. Through its response to the Scoping Report consultation, Historic England refer to its advice notes *Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment*, which sets out the historic environment factors which need to be considered during the Strategic Environmental Assessment or Sustainability Appraisal process; and *Historic England Advice Note 3: Site Allocations and Local Plans*, which sets out what we consider to be a robust process for assessing the potential impact of site allocations on any relevant heritage assets. In particular Historic England highlight the Site Selection Methodology. We would expect a proportionate assessment based on this methodology to be undertaken for any site allocation where there was a potential impact, either positive or negative, on a heritage asset, and the SEA consequently to advise on how any harm should be minimised or mitigated.
- 1.39. The Scoping Report should identify where there are gaps in evidence, for example the lack of conservation area appraisal for Isleham, and make recommendations for how these gaps are to be mitigated when undertaking the SEA.
- 1.40. Historic England advises that the conservation and archaeological staff of the relevant local planning authorities are closely involved throughout the preparation of the plan and its assessment, and the HER at Cambridgeshire County Council be consulted.

Natural England

- 1.41. In summary, through its response, Natural England generally supports the no significant effects findings of the report, and made the following recommendations:
- Whilst proposed development through the INP will avoid the extensive peat resource the Plan should recognise its important role as a carbon sink, helping to reduce and mitigate climate change and deliver other ecosystem services and biodiversity enhancement opportunities as part of the Nature Recovery Network (NRN).
 - As recommended by the HRA of the now withdrawn East Cambridgeshire Local Plan Review, development proposals at the site allocation (ISL7) should include the requirement for an ecological assessment that should consider the effects of increased recreational pressure on designated sites.
 - New housing development incorporating high quality open space, including biodiversity-rich habitats and circular dog-walking routes, can help to reduce additional pressure on more sensitive designated sites.
 - The Scoping Report identifies that INP Policy 7: Wildlife & Habitats requires development proposals to contribute to meeting the government's 25-year plan for the environment by enhancing connectivity, avoiding loss of wildlife habitats or natural features and encouraging proposals to provide an overall net gain in biodiversity. This is welcomed by Natural England and we suggest that Policy 7 could link these requirements to an objective to contribute towards delivery of the NRN, referenced above, and Natural Cambridgeshire's 'doubling nature' targets.

- 1.42. In light of the comments received, minor changes to the initial screening assessment were required, notably through the inclusion of additional baseline information relating to non-designated heritage assets of archaeological importance in proximity of Isleham. Many comments made by each of the statutory consultation bodies are particularly pertinent to the assessment of alternative site options and identification of mitigation measures, and are therefore considered in detail in Section 5.

2. Methodology for Strategic Environmental Assessment incorporating Habitats Regulation Assessment

Strategic Environmental Assessment (SEA)

- 2.1. The Localism Act 2011 (Schedule 9) introduced neighbourhood planning into the Town and Country Planning Act 1990. The 1990 Act, as amended by Schedule 10 of the Localism Act 2011, requires that NDPs meet a set of 'basic conditions'.
- 2.2. To ensure that a NDP meets the basic conditions, a SEA may be required to determine the likely significant environmental effects of implementing the NDP. The basis for Strategic Environmental legislation is European Directive 2001/42/EC, which was initially transposed into domestic law by the Environmental Assessment of Plans and Programmes Regulations 2004, or 'SEA Regulations'. Detailed guidance of these regulations can be found in the Government publication 'A Practical Guide to the Strategic Environmental Assessment Directive'⁶ and paragraph 073 of National Planning Practice Guidance (NPPG) 'Neighbourhood Planning' section⁷. Paragraph 073 of the Neighbourhood Planning section advises that a NDP should be screened early. Whether a NDP proposal requires a SEA, and (if so) the level of detail needed, will depend on what is proposed within the plan.
- 2.3. Where a proposed plan is likely to have a significant effect on a European site or European offshore marine site (in relation to the Habitats Regulations), this will also trigger the need to undertake a SEA. Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 makes provision in relation to the Habitats Regulations. The Regulations requires that any plan or project likely to have a significant effect on a European site must be subject to an Appropriate Assessment. To achieve this, paragraph 1 of Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 prescribes a basic condition that the making of a NDP is not likely to have a significant effect on a European site or a European offshore marine site. Paragraphs 2 to 5 go on to amend the Conservation of Habitats and Species Regulations 2010 so as to apply its provisions to neighbourhood development orders and plans. A NDP's (or Neighbourhood Development Order) requirements for Appropriate Assessment are clarified further by the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.
- 2.4. Article 3(5) of Directive 2001/42/EC details the criteria for determining whether plans are likely to have significant environmental effects. These criteria are outlined in **Figure 1**.
- 2.5. The Department of the Environment produced a flow chart diagram⁸ which sets out the process for screening a planning document to ascertain whether a full SEA is required. The flow chart diagram is provided in **Figure 2**.
- 2.6. **Section 4** provides firstly, a screening assessment of the draft INP against the assessment criteria (in **Figure 3**) to identify the significance of effects which may arise as a result of the plan's implementation.
- 2.7. Secondly, **Section 4** applies the SEA Directive to the draft INP, as per the flow chart in **Figure 4**, to determine whether the principle of the NDP would warrant the need for SEA.
- 2.8. In order to decide whether a SEA is required, the Council needs to consider the following:

⁶ Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf

⁷ Available at: <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

⁸ Department of the Environment, A Practical Guide to the Strategic Environmental Assessment Directive (2005)

- How the policies in the NDP might affect the environment, community or economy;
- Whether the policies are likely to adversely affect a “sensitive area”, such as a European site (SAC, SPA, Ramsar) or a SSSI, NNR etc.;
- Whether the policies propose a higher level of development than what is set out in the East Cambridgeshire Local Plan and that has been assessed by the SA of that Plan;
- Whether the implementation of the policies is likely to lead to new development;
- Whether the cumulative impact of the policies taken together may give rise to a significant effect.

2.9. Following the screening assessment, **Section 5** provides assessment of reasonable alternatives through a SEA Framework, for the purpose of identifying potential adverse impacts, potential mitigation measures, and monitoring indicators.

Habitats Regulations Assessment

- 2.10. A decision by the European Court of Justice (ECJ) (People Over Wind & Sweetman vs. Coillte Teoranta) in April 2018 has had a significant impact on the HRA process for both NDPs and Local Plans. In short, the ECJ ruled that in order to determine whether it is necessary to carry out a full HRA of the implications of a plan, it is not appropriate to take account of mitigation measures at the screening stage. Rather, consideration of mitigation will need to occur at the full Appropriate Assessment stage.
- 2.11. Following the UK’s withdrawal from the EU, decisions by the ECJ are no longer legally binding but may continue to be relevant⁹.
- 2.12. A consequence of the ECJ’s decision is that mitigation measures set out in a plan cannot be used at the screening stage to conclude there will be ‘no likely significant effects’ on European Sites. Therefore, if a NDP includes measures to counter the plan’s effects on European Sites these should, in effect, be ignored at the screening stage.
- 2.13. Previously, plan-making in the UK has followed case law as set out in Application of Hart DC vs. Secretary of the State for Communities and Local Government in 2008, which concluded that: ‘anything which encourages the proponents of plans and projects to incorporate mitigation measures at the earliest possible stage in the evolution of their plan or project is surely to be encouraged.’
- 2.14. The government has acknowledged that the ECJ’s ruling has caused uncertainty in preparing NDPs, and could result in more plans requiring a full SEA or HRA. In December 2018, The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018¹⁰ came into force, amending the basic conditions and allowing affected NDPs and Orders to proceed.
- 2.15. With regard to potential effects on European sites, this scoping report has been undertaken in accordance with the ECJ’s ruling, insofar that the effects of any mitigation measures set out in the policies of the INP have not been considered.

⁹ <https://www.legislation.gov.uk/ukpga/2018/16/section/6/enacted>

¹⁰ <http://www.legislation.gov.uk/uksi/2018/1307/contents/made>

FIGURE 1: SEA ASSESSMENT CRITERIA

Article 3. Scope

5. Member States shall determine whether plans or programmes referred to in paragraphs 3 and 4 are likely to have significant environmental effects either through case-by-case examination or by specifying types of plans and programmes or by combining both approaches. For this purpose Member States shall in all cases take into account relevant criteria set out in Annex II, in order to ensure that plans and programmes with likely significant effects on the environment are covered by this Directive.

Annex II Criteria for determining the likely significance of effects referred to in Article 3(5)

1. The characteristics of plans and programmes, having regard, in particular, to

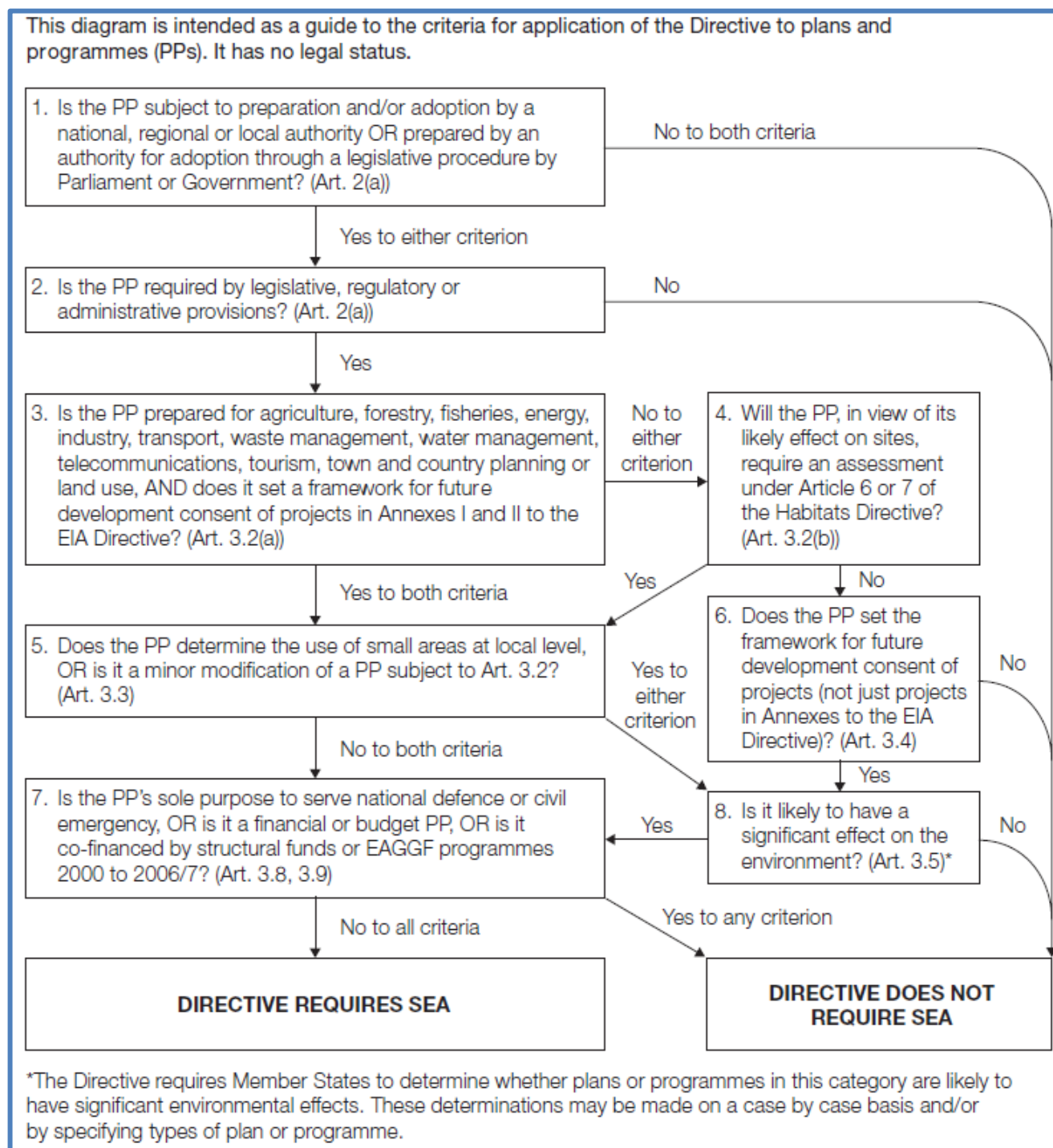
- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme;
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);

- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values;
 - intensive land-use;
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

FIGURE 2: APPLICATION OF THE SEA DIRECTIVE TO PLANS AND PROGRAMMES ¹¹



¹¹ Annexes I and II of Directive 2011/92/EU (as referred to in Figure 2, question 3) available at: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32011L0092&from=EN> (see <http://ec.europa.eu/environment/eia/eia-legalcontext.htm> for details of amendments). Articles 6 and 7 of the Habitats Directive (as referred to in Figure 2, question 4) available at: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992L0043&from=EN>.

3. Key information on the emerging Neighbourhood Plan and neighbourhood area

- 3.1. This section provides contextual information about the emerging Neighbourhood Plan and Neighbourhood Area, including relevant plans and strategies in the locality, and environmental characteristics of the Neighbourhood Area and surrounding area.

Local Plan context for the Neighbourhood Plan

- 3.2. The basic conditions require a NDP to be in *general conformity* with the strategic policies contained in the Development Plan (the Local Plan) for the area.
- 3.3. Through its strategic policies, the Local Plan effectively defines the parameters within which a NDP may operate. Throughout their preparation, Local Plans are subject to SEA (generally incorporated through a SA) and HRA. Where a NDP is in general conformity with the strategic policies of the Local Plan, it is likely that many of the environmental effects of the plan will have already been considered through the Local Plan-making process.
- 3.4. However, it is widely accepted that NDPs can promote higher levels of growth than the Local Plan (whilst still satisfying the basic condition for 'general conformity'), for example through making site allocations. In such cases, additional development may trigger a requirement for full SEA.
- 3.5. National planning policy states that evidence should be proportionate and should not repeat policy assessment already undertaken. It is therefore relevant to consider the strategic policy context for the purpose of avoiding duplication and to identify environmental effects not already considered and addressed through the Local Plan-making process.

East Cambridgeshire Local Plan 2015

Current status

- 3.6. The current East Cambridgeshire Local Plan was adopted in 2015. The Local Plan defines strategic and locally specific policies for the district, and covers a plan period from 2011 to 2031. During its preparation, the Local Plan was subject to a full SA (incorporating SEA) and HRA.
- 3.7. Being greater than five years old, it is necessary (by law) to regularly review its content to determine how 'up to date' it is. The Council undertook, and published, a second formal Review in April 2020¹². That Review, in summary, concluded that the:

"...Local Plan 2015 does require to be revised, but only partially and only in respect of its strategic housing policies. Of those policies, Policy GROWTH1 needs to be revised, because it has an out of date housing requirement. Other strategic housing policies may also be updated during the course of updating GROWTH1, should that be necessary.

The rest of the Local Plan is considered to not, at the present time, be in need of updating, therefore a full update of the Local Plan is not considered necessary.

However, whilst only one policy has been identified in need of updating, this does not prevent the Council from commencing preparation of a new Local Plan, in whole or part, on matters as it sees fit."

- 3.8. In light of these conclusions, East Cambridgeshire District Council (ECDC) has commenced a Single Issue Review (SIR) of the adopted Local Plan.

¹² <https://www.eastcambs.gov.uk/sites/default/files/ECDC%20LP%20Review%20April%202020.pdf>

Single Issue Review

- 3.9. At the time of writing this screening report, ECDC is at its first stage in the process of producing the Single Issue Review (SIR) of the Local Plan. This first stage (also sometimes known as a 'Regulation 18' consultation stage) of the Local Plan captures the issues which ECDC intends to address and includes proposals to tackle those issues.
- 3.10. The SIR's proposed changes include updating the Local Plan's housing requirement. The proposals do not seek to change the plan period, site allocations and broad locations for growth, or other policies in the plan.
- 3.11. The timetable for undertaking the SIR indicates that formal adoption will take place in October 2023. Therefore, at the time at which the INP will likely reach the examination stage, the Local Plan 2015 will remain the adopted Local Plan and the SIR will continue to be in progress.

Local Plan 2015 Spatial Strategy for Isleham

- 3.12. The adopted Local Plan directs the majority of growth to main settlements (such as Ely, Littleport and Soham), with a relatively modest amount of growth distributed across the rural area. Policy GROWTH 2 provides a locational strategy for the distribution of growth:

Policy GROWTH 2: Locational strategy

The majority of development will be focused on the market towns of Ely, Soham and Littleport. Ely is the most significant service and population centre in the district, and will be a key focus for housing, employment and retail growth.

More limited development will take place in villages which have a defined development envelope, thereby helping to support local services, shops and community needs.

Within the defined development envelopes housing, employment and other development to meet local needs will normally be permitted – provided there is no significant adverse effect on the character and appearance of the area and that all other material planning considerations are satisfied. Two key exceptions to this will apply in the case of proposals involving the loss of employment land or community facilities – which will be assessed against Policies EMP 1 and COM 3 respectively. Retail development should be focused where possible within the town centres of Ely, Soham and Littleport – or alternatively, if there are no suitable sites available, on edge of centre sites, then out of centre sites, in accordance with Policy COM 1 and other policies in Part 2 of this Local Plan.

Outside defined development envelopes, development will be strictly controlled, having regard to the need to protect the countryside and the setting of towns and villages. Development will be restricted to the main categories listed below, and may be permitted as an exception, providing there is no significant adverse impact on the character of the countryside and that other Local Plan policies are satisfied...

Excerpt from policy GROWTH 2, p25 East Cambridgeshire Local Plan

- 3.13. The Isleham Neighbourhood Area is contiguous with Isleham parish boundary (which includes the village of Isleham) and is located within East Cambridgeshire's rural area. The Local Plan provides a description of Isleham's characteristics:

Isleham is a village of considerable interest with its buildings of clunch and pebble, ragstone and brick which range from late medieval to the present. The village lies 9 miles south-east of Ely and 6 miles north-east of Newmarket.

The village contains a large number of Listed Buildings and a Conservation Area centred on Church Street, Pound Lane and Mill Street. The scheduled remains of an 11th century

Benedictine Priory and the listed priory church are located 100m west of the Church of St Andrew. The B1104 road runs through the village, meeting at the historic centre of the village.

Isleham has a reasonable range of services including a post office, several shops, three public houses, three churches, a village hall, a large recreation ground (including an all-weather surface), a bowls club, a playground, a primary school and two bus services which run through the village.

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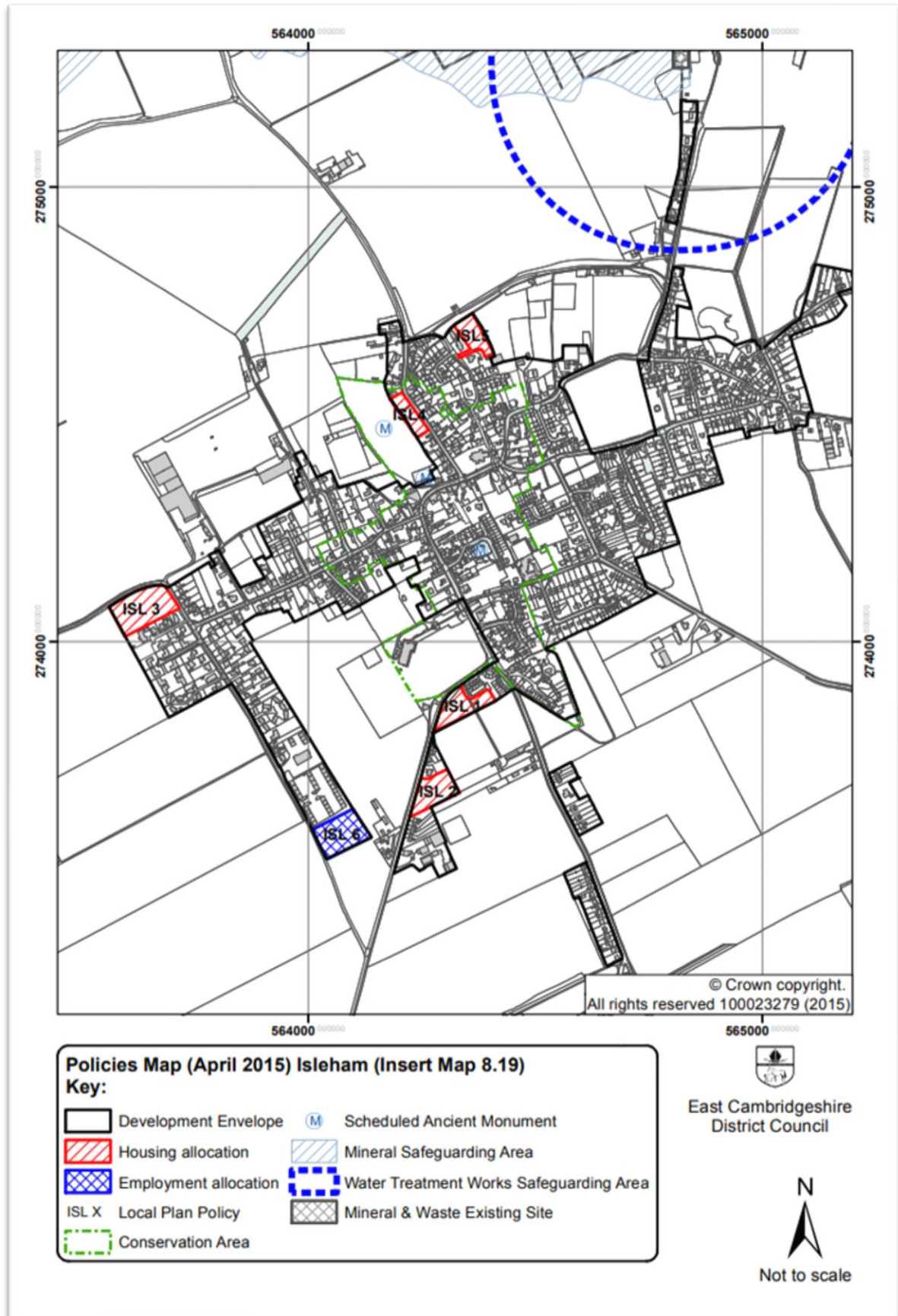
- 3.14. The Local Plan expects continued housing growth within Isleham over the course of the plan period on allocated sites and at infill sites:

Isleham is likely to continue to grow in the future, with new housing being built on suitable 'infill' sites within the village. In addition new housing allocation sites are proposed at five locations across the village. (see Policies ISL 1, ISL 2, ISL 3, ISL 4 and ISL 5)

p200 East Cambridgeshire Local Plan

- 3.15. For the avoidance of doubt, Isleham is not one of the 'market towns' described as the focus for growth in policy GROWTH 2. The Local Plan defines a Development Envelope around Isleham village within which such 'infill' development will generally be acceptable. Applying policy GROWTH 2, Isleham's 'place' in the locational strategy is as a '*village with a defined development envelope*' in which '*more limited development*' will take place.
- 3.16. There has been good progress in the development of some Local Plan site allocations in Isleham:
- Policy ISL 1: Housing allocation, land south and west of Lady Frances Court (approx. 15 dwellings) – No planning application at present;
 - Policy ISL 2: Housing allocation, land at 5a Fordham Road (approx. 10 dwellings) – Has planning consent for 10 dwellings (17/00510/FUM) and site is under construction with some plots completed;
 - Policy ISL 3: Housing allocation, land west of Hall Barn Road (approx. 12 dwellings) – Has full planning permission for 14 dwellings (17/01249/RMM), but development has not commenced;
 - Policy ISL 4: Housing allocation, land west of Pound Lane (approx. 3 dwellings) – Has full planning permission for five dwellings (inc. 4 dwellings at 18/00634/FUL and 1 dwelling at 18/01214/FUL);
 - Policy ISL 5: Housing allocation, land at Church Lane (approx. 5 dwellings) – Four dwellings have been constructed on site and development is complete.
- 3.17. There are a number of businesses in the village, including at Wells Business Park and Hall Barn Road Industrial Estates and seeks to retain the stock of business land and premises in order to support local economic growth. The Local Plan proposes the allocation of additional employment land in the form of an extension to Hall Barn Road Industrial Estate through site allocation ISL 6 – Land adjacent to Hall Barn Road Industrial Estate. The site has outline planning permission (16/0629/OUM) for the development of industrial buildings.
- 3.18. The location of housing and employment allocations in Isleham village are shown on Map 1.
- 3.19. The Local Plan identifies a need for improvements to infrastructure and facilities in the village, including provision of a new primary school; improvements to play areas; improvements to the community/village hall; improvements to open space; improvements to existing roads; and potential upgrade to Isleham Waste Water Treatment Works.

MAP 1: LOCAL PLAN INSET MAP – ISLEHAM



Withdrawn Local Plan

- 3.20. In February 2018, East Cambridgeshire District Council submitted for examination a new Local Plan along with a supporting evidence base. Examination of the Local Plan commenced in June 2018. In February 2019, East Cambridgeshire District Council withdrew the draft Local Plan.
- 3.21. At the point of withdrawal, the draft Local Plan was at an advanced stage of its preparation and had been subject to a full Sustainability Appraisal incorporating SEA, and a full HRA. The withdrawn Local Plan proposed a similar growth strategy to the adopted Local Plan, focussing growth principally in the market towns, but with an increased role for some villages in the rural area. This included the identification of five proposed site allocations in Isleham village.
- 3.22. Whilst the withdrawn Local Plan document has no formal planning status, East Cambridgeshire District Council has retained the HRA (dated June 2018) as it provides evidence and guidance on issues relating to European Sites which the Council believes remains relevant to applicants, decision-makers and to the preparation of Neighbourhood Plans.

Other plans and strategies

- 3.23. It is necessary to also consider other plans and strategies affecting the district and surrounding area, since SEA requires consideration of the *cumulative* nature of effects, and HRA requires *in-combination* assessment

Neighbourhood Plans

- 3.24. There are 10 designated Neighbourhood Areas in East Cambridgeshire district and three formally made Neighbourhood Plans (Fordham, Sutton and Witchford). Each of those made Neighbourhood Plans was *screened out* of the SEA & HRA process and therefore are not likely to have significant effects on the environment or designated sites.
- 3.25. The majority of the remaining Neighbourhood Areas are in the early stages of plan preparation. The Reach Neighbourhood Plan and Swaffham Bulbeck Neighbourhood Plan are following a similar timetable to the INP. A SEA & HRA screening assessment was recently carried out by EDCD. The Reach Neighbourhood Plan was *screened out* of the SEA & HRA process. The Swaffham Bulbeck Neighbourhood Plan has been *screened in* for SEA and an Environmental Report published, although the potential environmental effects are limited to the Swaffham Bulbeck Neighbourhood Area only.
- 3.26. Isleham is located in the east of East Cambridgeshire district and shares a boundary with West Suffolk District Council. There are eleven designated Neighbourhood Areas in West Suffolk, of which three neighbourhood Plans have been subject to SEA screening:
- Great Barton Neighbourhood Plan (passed referendum 06 May 2021) – *screened out*
 - Hargrave Neighbourhood Plan (made July 2018) – *screened out*
 - Newmarket Neighbourhood Plan (made February 2020)– *screened out*
- 3.27. There are no Neighbourhood Development Plans (or Orders) relevant to the SEA or HRA of the INP.

Minerals & Waste Local Plan

- 3.28. The *Cambridgeshire and Peterborough Minerals and Waste Local Plan* forms the current adopted Local Plan for minerals and waste development in the Isleham Neighbourhood Area.

- 3.29. The HRA concluded that the Local Plan is compliant with the Habitats Regulations and will not result in likely significant effects on any of the European sites identified, either alone or in combination with other plans and projects.
- 3.30. The Minerals & Waste Local Plan is relevant to the SEA and HRA of the INP as it sets policies and includes designations which affect the Isleham Neighbourhood Area.

Other authorities' Local Plans

- 3.31. The following local planning authority areas adjoin East Cambridgeshire district, and have adopted Local Plan documents:
- Fenland District Council - Local Plan adopted 2014;
 - Borough Council of Kings Lynn and West Norfolk - Core Strategy adopted 2011 and Site Allocations and Development Management Policies DPD adopted 2016;
 - West Suffolk Council - Core Strategy adopted 2010 relating to former Forest Heath and St Edmundsbury areas, with subsequent Site Allocations, Development Management Policies and other DPDs;
 - South Cambridgeshire District Council – Local Plan adopted 2018; and
 - Huntingdonshire District Council – Local Plan adopted 2019.
- 3.32. The *East Cambridgeshire Habitats Regulation Assessment 2018*¹³ (HRA 2018) indicates that all plans have the potential for environmental affects relating to growth and development, for example:
- Habitat damage and/or loss
 - Disturbance from recreational pressure
 - Increased demand for water resources
 - Reduced water quality from pollution
 - Atmospheric pollution from increased vehicle journeys
- 3.33. Plans in proximity of designated sites include measures to avoid adverse harm to those habitats. For example, the Borough Council of Kings Lynn and West Norfolk Core Strategy, at policy *CS12 Environmental Assets*, provides mitigation for potential significant effects, restricting new development within 1,500m of the Breckland SPA, and its Development Management Policies Plan provides mitigation for potential significant effects, requiring project level HRA and an agreed package of habitat protection measures to avoid adverse effects on European sites.
- 3.34. The Forest Heath Core Strategy (West Suffolk) at policy *CS2 Natural Environment* provides mitigation for potential significant effects, restricting new development within 1,500m of the Breckland SPA. New road infrastructure is not permitted within 200m of sites designated as SACs.
- 3.35. The St Edmundsbury Core Strategy (West Suffolk) at policy *CS2 Sustainable Development* provides mitigation for potential significant effects, protecting the network of designated sites, including Breckland SPA and applies a 400m buffer zone for Woodlark and Nightjar and 1,500m for areas that support Stone Curlew.

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<https://www.eastcambs.gov.uk/sites/default/files/HRA%20Appropriate%20Assessment%20Post%20Submission%20Local%20Plan%20-%20published%2015.6.18.pdf>

- 3.36. The Joint Forest Heath and St Edmundsbury (i.e. West Suffolk) Development Management Policies (at policy DM12) provides mitigation for potential significant effects, requiring all new development shown to contribute to recreational disturbance and visitor pressure within the Breckland SPA and SAC to make appropriate S106 contributions towards management projects.

Local Transport Plan

- 3.37. Following the formation of the Cambridgeshire & Peterborough Combined Authority, responsibilities to prepare a Local Transport Plan transferred from Cambridgeshire County Council to the Combined Authority. The Cambridgeshire & Peterborough Local Transport Plan (2020) sets out the vision, goals and objectives that define how transport will support the Cambridgeshire and Peterborough Combined Authority's Growth Ambition.
- 3.38. The LTP 2020 was subject to SEA and HRA. The SEA concludes that LTP 2020 promotes sustainable transport modes including low and zero emission vehicles which will help reduce transport-related emissions providing benefits for air quality, greenhouse gas reduction and health. The LTP 2020 promotes new road and rail transport infrastructure which has the potential for positive or negative effects depending on the location of the projects and mitigation measures incorporated into the design. Negative effects could include habitat loss and fragmentation, death, injury or disturbance to species, visual impacts, damage to heritage assets and archaeology, effect on setting of heritage assets, land take including loss of agricultural land, and water pollution.
- 3.39. The HRA concluded that there are no likely significant effects on European sites.
- 3.40. The LTP 2020 shows no major infrastructure projects within the Isleham Neighbourhood Area. However, the area could potentially benefit from district-wide walking and cycling improvements.
- 3.41. The *East Cambridgeshire Transport Strategy*, (known as the 'TSEC') adopted July 2017, sets out a detailed policy framework and action plan of potential transport improvements for the area, addressing current problems and is consistent with the third Cambridgeshire Local Transport Plan and has been retained under the Combined Authority's Local Transport Plan. The TSEC supports the East Cambridgeshire Local Plan by taking into account the predicted levels of growth and detailing the transport infrastructure and services necessary to deliver this growth.
- 3.42. The TSEC identifies the following transport projects, reflecting the infrastructure priorities for Isleham as identified by the *East Cambridgeshire Local Plan 2015*, but which at present remain unfunded¹⁴:
- **E-58: Cycle route improvement: Burwell – Fordham – Isleham:**
 - **E-63 – Investigate speed reduction measures through the village:**

Water Resources and Infrastructure

- 3.43. Anglian Water's *Water Resources Management Plan* (WRMP) sets out how Anglian Water will manage the water supplies in the region to meet current and future needs over a minimum of 25 years. The current WRMP was published in 2019 and covers the period from 2020-2045.
- 3.44. Anglian Water's supply-demand balance is under significant pressure from population growth, climate change, sustainability reductions and the need to increase resilience to severe drought. These challenges are acute in the Anglian Water region, which is characterised by low rainfall and is home to a significant proportion of wetland sites of conservation interest. These

¹⁴ <https://www.cambridgeshire.gov.uk/asset-library/Transport-Delivery-Plan-2020-2023-v2.pdf>

pressures drive the need for investment in both demand management and supply-side options, particularly in the short-term.

- 3.45. The Environment Agency's *Cam and Ely Ouse Abstraction Licensing Strategy* (2020) sets out how the Environment Agency will manage future abstraction within the Cam and Ely catchment. Under the Habitats Regulations, the Environment Agency has a duty to assess the effects of existing abstraction licences and any new applications to make sure they are not impacting on internationally important nature conservation sites. Water efficiency is also tested by the Environment Agency before a new licence is granted. If the assessment of a new application shows that it could have an impact on a SAC/SPA, the Environment Agency will have to follow strict rules in setting a time limit for their licence.
- 3.46. The Environment Agency's *Anglian River Basin Management Plan* (2015) sets out the measures needed to bring more water courses to good status to meet the requirements of the Water Framework Directive.
- 3.47. The Environment Agency's *Great Ouse Catchment Flood Management Plan Summary Report* (2011) is used by the Environment Agency and partners to plan and agree the most effective way to manage flood risk in the Great Ouse catchment.

Vision, aims and objectives of the Isleham Neighbourhood Plan

- 3.48. The INP sets out the following Vision for the Neighbourhood Area:

Our vision is that this Neighbourhood Plan should help maintain and further improve the character, infrastructure and environmental features of our village for both the current and future generations..

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- 3.49. The INP identifies six objectives to achieve the vision, which echo the three over-arching objectives for sustainable development: environmental, social and economic:

- 1. the history of our village will be honoured and maintained, with new history being recognised and celebrated**
- 2. Isleham will maintain its visual and physical separation from Fordham and that its place in the locality will grow positively in terms of both its independence and its interdependence of other local towns and villages**
- 3. as the population of Isleham inevitably grows, it will be a place where everyone; feels safe, welcomed, experiences positive wellbeing and is able to contribute to our very special community.**
- 4. the demand for new housing will be justified, carefully planned and will have a positive impact on the villages distinctive character and semi- rural environment.**
- 5. that the natural landscape including footpaths, green spaces and valued views will be protected and where wildlife and habitats are able to flourish**
- 6. that as the village experiences growth, there will be proportionate improvements to the infra-structure of our village including increased employment opportunities and transport links.**

Draft INP policies

3.50. To deliver the Vision and Objectives, the INP proposes 11 policies in total, which are summarised in Table 1. Note that the table provides a *summary* of the policies intent, not the actual policy wording.

TABLE 2: SUMMARY OF DRAFT ISLEHAM NEIGHBOURHOOD PLAN POLICIES

Policy	Summary
Policy 1a: Housing Growth	<p>The policy confirms that the 'indicative housing requirement', issued by ECDC for the Isleham Neighbourhood Area, between 2020 and 2031 is 0 dwellings.</p> <p>The policy supports additional sustainable development where this contribute to the needs of the village, such as</p> <ul style="list-style-type: none"> • small-scale infill and windfall developments within the Development Envelope; • development of approximately 45 dwellings at the INP's site allocation 'Land off Fordham Rd' (site ISL7); and • rural affordable housing exception site development. <p>Policy 1a updates the Development Envelope to reflect recent completed developments and sites with planning permission. Notably, the Development Envelope has been amended to include site 'Land Accessed Between 2 And 4 Fordham Road Isleham' (19/00447/RMM) for the construction of 121 dwellings.</p> <p>Land outside the Development Envelope is defined as open countryside. Opportunities for development in the open countryside are limited to types of development with a genuine need to be located in the countryside or to meet local needs which cannot be met within the Development Envelope, such as affordable housing, the operation of existing rural businesses, provision of new or replacement community facilities or essential infrastructure, etc.</p> <p>The policy includes design principles to ensure development proposals are of an appropriate scale and avoid adverse impacts on amenity, character and setting of Isleham village and its surrounding landscapes, the historic and natural environment, and services, facilities and infrastructure.</p>
Policy 1b: Housing Types	<p>The policy requires development proposals to provide a mix of house types and sizes, and favours proposals which provide two bedroomed dwellings, meet the needs of an ageing population, and are suitable for lifetime occupation.</p> <p>To protect the character of the built form of the village, seeks to limit building heights by resisting proposals for flats or apartments of three storeys or more.</p> <p>The policy requires on-site provision of affordable housing, and supports the development of Rural Exception Sites where the majority of homes are affordable, meets local needs and prioritises households with a local connection.</p> <p>The policy requires there to be sufficient infrastructure capacity to meet the needs of the development, prior to granting planning permission.</p>
Policy 2: Character & Design	<p>The policy sets out a range of design principles to ensure that development proposals deliver high quality design, such as ensuring development is of an appropriate size and scale for the site; responding to key features and important characteristics on the site; introducing visual interest from the surrounding areas;</p>

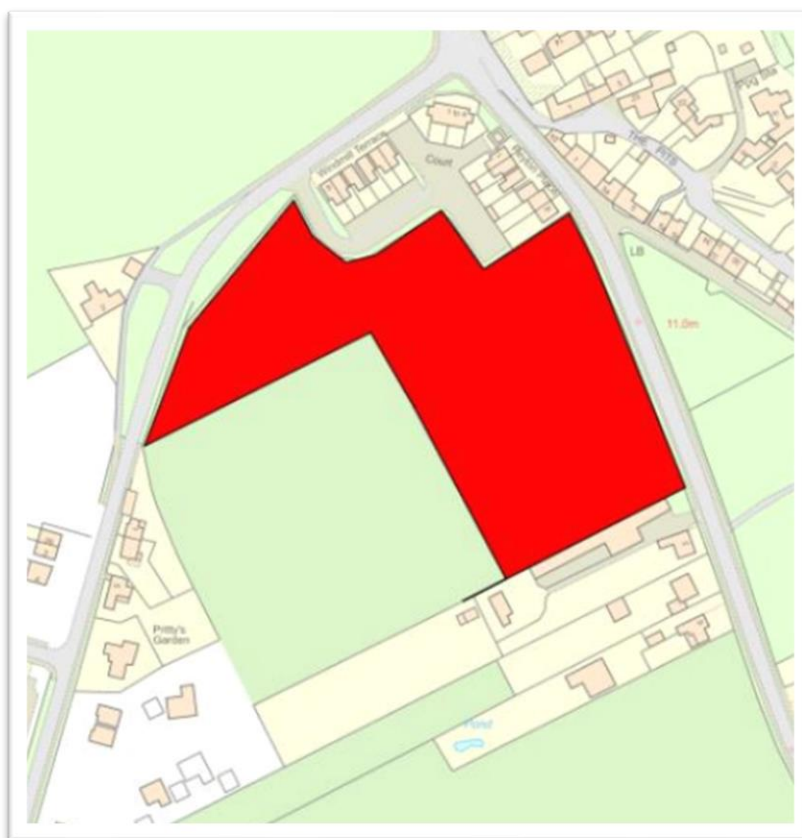
	<p>providing a mix of dwelling styles and sizes; protecting character by limiting building heights to two storeys or fewer; providing robust green landscaping schemes; providing adequate amenity space for occupants and limit impacts on amenity of neighbours; ensuring buildings and spaces that are accessible, inclusive and safe; and using high quality materials.</p> <p>The policy makes clear that proposals that exhibit substandard design quality will not be supported, and those of outstanding or innovative design will be supported.</p> <p>Development proposals are required to demonstrate at planning application stage how decisions on the design of the proposal were arrived at and why they are appropriate for the context of the site.</p>
Policy 3: Local Green Spaces	The policy designates 13 green areas as Local Green Spaces, providing protection from development in accordance with national policy for Green Belts.
Policy 4: Maintaining Separation	<p>The policy resists development proposals located in areas between Isleham and any neighbouring settlement which would visually or physically reduce separation or sense of separation.</p> <p>Development proposals in these 'gaps' are required to supply evidence of the visual impact of the proposed scheme.</p>
Policy 5: Locally Important Views	<p>The policy identifies 11 views of local importance.</p> <p>The policy requires development proposals to not obstruct or detract from a Locally Important View, and requires certain proposals to be accompanied by evidence which demonstrates the proposal will not harm the locally important view.</p>
Policy 6: Heritage Assets & Locally Important Buildings & Structures	<p>The policy identifies 13 'locally important buildings' based on their contribution to the historic environment.</p> <p>The policy requires development proposals with potential to affect the significance of any Locally Important Building to be accompanied by a heritage statement.</p> <p>Proposals which enhance the significance of LIBs are supported, and those which result in harm to should normally be refused.</p>
Policy 7: Wildlife & Habitats	<p>The policy requires development proposals to contribute to meeting the government's 25-year plan for the environment; enhance connectivity of green networks through the inclusion of strong landscaping schemes; and avoid the loss of wildlife habitats or natural features such as trees, hedgerows, watercourses or ponds.</p> <p>The policy encourages proposals to provide an overall net gain in biodiversity, and where the loss of a feature is unavoidable supports the use of mitigation measures.</p>
Policy 8: Services and Facilities	The policy supports proposals for the delivery of new community facilities and generally resists the loss of valued community facilities.
Policy 9: Pedestrian	The policy includes measures to protect public rights of way from obstruction, adverse visual impacts, and loss of tranquillity, which could potentially arise from

Access & Public Rights of Way	new development. Proposals which increase pedestrian access and extend the public rights of way network are supported.
Policy 10: Car Parking	<p>The policy requires development proposals to normally provide vehicle parking on-plot, with any on-street or courtyard parking supported by justification that it is the most appropriate design solution for the proposal.</p> <p>Proposals are expected to include facilities (charging points) for electric vehicles, supported by evidence that the number and location of charging points is appropriate.</p>
Policy 11: Cycle Parking & Storage	The policy requires residential development proposals to be accompanied by adequate, safe and secure cycle parking.

Overview of Neighbourhood Plan's approach to allocating land for development

- 3.51. As indicated in Table 1, the INP identifies a new site allocation for the development of up to 45 dwellings – referred to as 'Land off Fordham Rd' site *ISL7*. The location and extent of the site is indicated in Map 2.
- 3.52. It is important to note that Site ISL7 includes the full extent of site allocation ISL1 (in other words, *ISL7 supersedes ISL1*). Therefore, whilst ISL7 is expected to provide 45 dwellings, this equates to a net gain of +30 dwellings over and above the amount of growth allocated by the Local Plan 2015.

MAP 2: PROPOSED SITE ALLOCATION



- 3.53. The INP notes that affordability of housing is an issue, and through allocating a site makes efforts to address this. The INP indicates that the site is in the ownership of a local charity, an

Almshouse Trust which has been providing affordable housing in the village for hundreds of years. Due to the charitable ownership of the site, the INP explains:

...we are confident that this site could be developed with both sensitivity and reflecting the need to prioritise the development of shared ownership / affordable properties.

p24, Draft Isleham Neighbourhood Plan

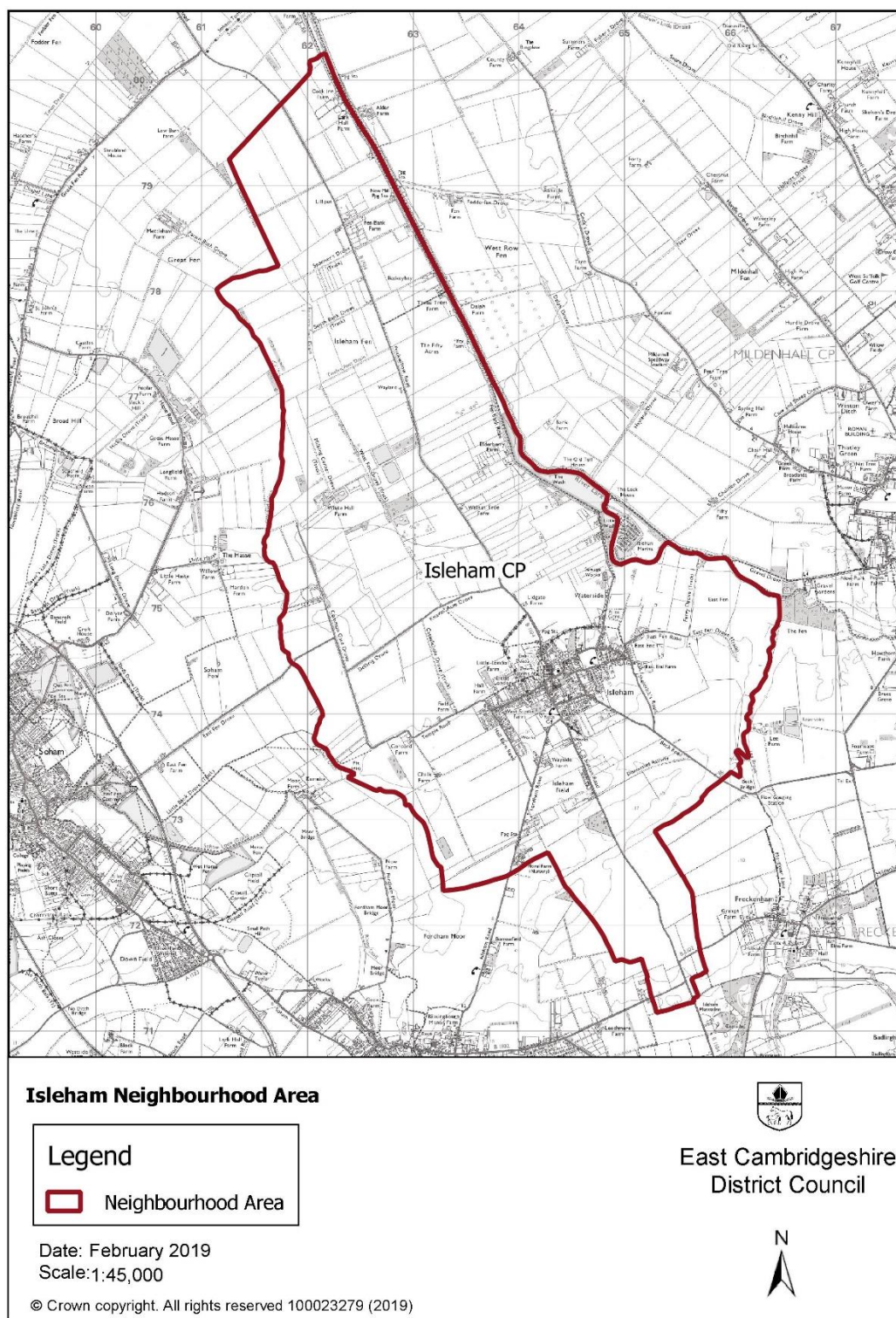
- 3.54. The Local Plan 2015 supports the development of rural exception sites for affordable housing and community-led developments in locations outside of the Development Envelope (policies HOU 4 and GROWTH 6). Therefore, in the absence of the INP, the site has some potential to be delivered in accordance with the current Local Plan.
- 3.55. In 2020, ECDC faced a legal challenge in relation to the Witchford Neighbourhood Plan¹⁵. A consequence of the judge's ruling is that sites which have planning permission at the time of preparing a Neighbourhood Plan can no longer be allocated, and instead should be referred to as 'committed sites'. Therefore, if the status of the INP's proposed site allocation changes during preparation of the INP, then policy 1a may require modification to reflect the site's planning status.
- 3.56. The INP updates the Development Envelope around Isleham village, reflecting recent planning consents and completed developments, the most significant of which is site 'Land Accessed Between 2 And 4 Fordham Road Isleham' (19/00447/RMM) for the construction of 121 dwellings. In principle, proposals for new infill development are supported within the development envelope.
- 3.57. The INP limits development outside the Envelope (i.e. in the countryside) to rural exception housing on the edge of the village; and the operation of existing businesses; and provision of essential infrastructure.
- 3.58. Whilst there are some subtle differences, the INP's approach to development within and outside the Development Envelope is broadly aligned with the Local Plan 2015.

¹⁵ Manor Oak Homes and Catesby Strategic Land v East Cambridgeshire DC and Witchford Parish Council

Overview of key environmental constraints in the neighbourhood area

- 3.59. Isleham parish covers a total area of 2,110 ha. It is located at the east of East Cambridgeshire district. Isleham village is located in the southern 'half' of the parish, and is approximately 11km south east of the City of Ely and approximately 5km east of the market town of Soham.
- 3.60. Isleham parish was formally designated as a Neighbourhood Area by ECDC on 21 February 2019. The designated area is shown in Map 3.

MAP 3: BOUNDARY OF THE DESIGNATED ISLEHAM NEIGHBOURHOOD AREA (ECDC)



Environmental themes

- 3.61. The SEA Regulations set out a range of themes that could be addressed in the Environmental Report:
- Biodiversity, flora and fauna
 - Population
 - Human health
 - Landscape
 - Water
 - Soil
 - Climatic factors
 - Air
 - Cultural heritage, including architectural and archaeological heritage
 - Material assets
 - The inter-relationship between the issues referred to above
- 3.62. *Locality* has prepared guidance for carrying out SEA for Neighbourhood Plans. The guidance identifies the following environmental features and assets as relevant to the SEA themes:
- **National Parks** - Protected by the National Parks and Access to the Countryside Act 1949, the NPPF identifies these as landscapes of exceptional beauty which are influenced by the nature and communities which live in them. The NPPF highlights that great weight should be given to conserving and enhancing the landscape and scenic beauty in National Parks, and states that they have the highest status of protection in relation to these issues.
 - **Areas of Outstanding Natural Beauty** - An AONB is land protected by the Countryside and Rights of Way Act 2000 (CROW Act) to conserve and enhance its natural beauty. They comprise nationally designated landscapes of exceptional quality. With National Parks, the NPPF highlights that great weight should be given to conserving and enhancing the landscape and scenic beauty in AONBs, and states that they have the highest status of protection in relation to these issues.
 - **European sites** - European sites refer to the UK network of protected areas covering the most valuable and threatened species and habitats, as listed under the EC Birds Directive (79/409/EEC) and the Habitats Directive (92/43/EEC). These sites constitute the UK's contribution to the Bern Convention Emerald Network of internationally important sites. They include Special Areas of Conservation (SAC) and Special Protection Areas (SPA), as well as Potential or candidate SACs, Possible SPAs and Ramsar sites (wetlands of international importance). The NPPF, which refers to these as habitats sites, highlights that the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a European site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the site.
 - **Sites of Special Scientific Interest (SSSIs)** - Natural England identifies and protects SSSIs in England under the Wildlife and Countryside Act 1981 (as amended). Natural England will select and notify an area as a new SSSI when it believes the land's wildlife, geology or landform is of special interest. SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the sensitivities of the features for which it is notified.¹³ They specify the types of development that have the potential to have adverse

impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs. The NPPF highlights that development on land within or outside of the SSSI (either alone or in combination with other developments) which is likely to have adverse effects should not normally be permitted.

- **World Heritage Sites** - World Heritage Sites are described by the United Nations Educational, Scientific and Cultural Organisation (UNESCO) as exceptional places of 'outstanding universal value' and 'belonging to all the peoples of the world, irrespective of the territory on which they are located'. The NPPF identifies these assets as an irreplaceable resource which should be conserved and enhanced in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Scheduled monuments are sites of national archaeological importance protected by the Ancient Monuments and Archaeological Areas Act 1979.
- **National Nature Reserve (NNR)** - National Nature Reserves (NNRs) were established to protect some of England's most important habitats, species and geology, and to provide 'outdoor laboratories' for research. NNRs are of national importance and represent an area which is among the best examples of a particular habitat. Consideration should be given both to likely effects on the biodiversity value of the National Nature Reserve and opportunities for research and visitor enjoyment.
- **Nationally listed buildings** - Nationally listed buildings are classed as Grade I, Grade II* or Grade II listed. Grade I buildings are of 'exceptional interest', Grade II* buildings are 'particularly important buildings of more than special interest' and Grade II buildings are of 'special interest'. Grade I or II* are those of 'outstanding architectural or historic interest' and comprise only 8.3% of listed buildings in England. Whilst consideration of the fabric and setting of all listed buildings is appropriate through screening, likely effects on Grade I and Grade II* listed structures have the potential to be particularly significant.
- **Buildings at risk** - Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II* listed buildings, and scheduled monuments, conservation areas, wreck sites and registered parks and gardens in England deemed to be 'at risk'. In some locations, surveys of Grade II listed buildings have also been carried out. The listing of a structure on the 'at risk' register highlights a particular sensitivity of a site.
- **Conservation area** - Whilst conservation areas are locally designated, they typically represent important concentrations of key historic environment features and townscapes.
- **Flood zone 3a and 3b** - Flood zone 3 development needs to submit a flood risk assessment as part of its planning application. Flood zone 3 is split into flood zone 3a and 3b. Flood zone 3a represents land which has been shown to be at a 1% or greater probability of flooding from rivers or 0.5% or greater probability of flooding from the sea. Flood zone 3b represents land which has been shown to be at a 5% or greater probability of flooding from rivers or the sea. Significant environmental effects may result from a Neighbourhood Plan, particularly where potential development areas are heavily constrained by flood risk zones.
- **Air Quality Management** - Area Air Quality Management Areas are designated because they are not likely to achieve national air quality objectives. Pollutants can include emissions of particulate matter or nitrogen dioxide from transport sources or sulphur dioxide from industrial activities. In practice Neighbourhood Plans have the most potential to affect air quality through effects on road transport.
- **Best and most versatile agricultural land** - The Agricultural Land Classification classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are the 'best and most versatile' land and Grades 3b to 5 are of poorer quality. Consideration should be made to

the location of Grade 1 to 3a land in respect to potential development areas. Grade 1 land is the most valuable agricultural land. The likely significance of effects on such land may be influenced in part on local availability of best and most versatile agricultural land.

- **Source Protection Zones** - Source Protection Zones for groundwater sources such as wells, boreholes and springs used for public drinking water supply have been designated by the Environment Agency. These zones show the risk of contamination from any activities that might cause pollution in the area. Generally, the closer the activity, the greater the risk. Three main zones (inner, outer and total catchment) have been applied to groundwater sources with a fourth zone of special interest occasionally applied. An Inner zone (Zone 1) is defined as the 50-day travel time from any point below the water table to the source. This zone has a minimum radius of 50 metres. Through the consideration of the presence of Source Protection Zones, regard should be made to the likelihood of Neighbourhood Plan activities contaminating groundwater sources;
- **Locally designated nature conservation sites** - for example, Local Wildlife Sites, County Wildlife Sites, Sites of Importance for Nature Conservation, Sites of Nature Conservation Importance and others;
- **Local Nature Reserves**;
- **Irreplaceable habitats** - such as ancient woodland, ancient and veteran trees) and priority habitats;
- **Non-designated and locally listed historic environment assets**;
- **Areas of high archaeological potential**;
- **Locations where air quality is monitored due to potential exceedances to air quality objectives**;
- **Areas with surface water flooding issues**;
- **Areas with significant areas of contaminated land**;
- **Soil types**;
- **Locations within coastal change management areas**;
- **Scheduled Monuments**;
- **Registered Parks & Gardens**;
- **Registered Battlefield Sites**;
- **National Character Areas**.

3.63. The Isleham Neighbourhood Area's proximity to each of the designations, features or assets listed is indicated in Table 3. These features have been identified through a desk-based assessment, including GIS analysis of various publicly available spatial datasets. The table therefore provides a comprehensive summary of the environmental constraints related to the Neighbourhood Area.

- 3.64. The potential effects of the INP on those features identified is discussed in *Section 4 - Assessment*. Where available and relevant to the SEA themes, the assessment (in section 4) draws on other data sources, studies, and strategic policy documents.
- 3.65. Depending on the characteristics of the environmental feature, a range of distances are applied in identifying assets. For example, for certain features it may be appropriate to search only within the Neighbourhood Area itself. For other features it may be necessary to extend the area of search beyond the Neighbourhood Area.
- 3.66. The following 'buffers' have been applied to determine the area of search for environmental features and designations:
- Neighbourhood Area + 0.4km (400m) buffer where the feature is potentially at risk from urbanisation - for example, development within the setting of the feature, or other localised issues such as increased littering, eutrophication or predation from cats.
 - Neighbourhood Area + 8km (8,000m) buffer where the feature is potentially at risk from visitor disturbance or recreational pressure.
 - Neighbourhood Area + 30km (30,000m) buffer where the feature may have a functional relationship to surrounding land, such as water courses, green infrastructure, or land providing opportunities for grazing or foraging for protected species.
 - Neighbourhood Area only, where only land within the neighbourhood area is a relevant consideration.
- 3.67. The justification for the proximity value is provided in Table 3. The implications and significance of the identified potential environmental constraints are discussed in section 4.

TABLE 3: OVERVIEW OF POTENTIAL ENVIRONMENTAL CONSTRAINTS

Potential environmental constraint	Proximity metric	Data source	Summary of features identified
National Parks	Neighbourhood Area + 8km due to potential for increased visitor pressure from new development	https://data.gov.uk/dataset/334e1b27-e193-4ef5-b14e-696b58bb7e95/national-parks-england	There are no National Parks within the Neighbourhood Area or 8km buffer.
Areas of Outstanding Natural Beauty (AONB)	Neighbourhood Area + 8km due to potential for increased visitor pressure from new development	https://data.gov.uk/dataset/8e3ae3b9-a827-47f1-b025-f08527a4e84e/areas-of-outstanding-natural-beauty-england	There are no AONBs within the Neighbourhood Area or 8km buffer.
European sites	Neighbourhood Area + 30km due to potential for effects on functionally related land	https://data.gov.uk/dataset/67b4ef48-d0b2-4b6f-b659-4efa33469889/ramsar-england https://data.gov.uk/dataset/a85e64d9-d0f1-4500-9080-b0e29b81fbc8/special-areas-of-conservation-england https://data.gov.uk/dataset/174f4e23-acb6-4305-9365-1e33c8d0e455/special-protection-areas-england	<p>There are no SACs, SPAs or Ramsars within the Neighbourhood Area. The following European Sites are within 30km of the Neighbourhood Area:</p> <p>Breckland SPA / SAC Fenland (Chippenham Fen) SAC / Ramsar Devils Dyke SAC Fenland (Wicken Fen) SAC / Ramsar Norfolk Valley Fens SAC Ouse Washes SPA / SAC / Ramsar Rex Graham Reserve SAC</p> <p>There are no Proposed Ramsar sites, Possible Special Areas of Conservation, or Potential Special Protection Areas in proximity of Isleham Neighbourhood Area</p>
Sites of Special Scientific Interest (SSSIs)	Neighbourhood Area + 8km due to potential for increased visitor pressure from new development	https://data.gov.uk/dataset/5b632bd7-9838-4ef2-9101-ea9384421b0d/sites-of-special-scientific-interest-england	<p>There are no SSSIs within the Neighbourhood Area. The following SSSIs are within an 8km of the Neighbourhood Area:</p> <ul style="list-style-type: none"> • Brackland Rough • Breckland Farmland • Breckland Forest • Cam Washes • Cavenham - Icklingham Heaths • Cherry Hill and The Gallops, Barton Mills • Chippenham Fen and Snailwell Poor's Fen • Delph Bridge Drain • Ely Pits and Meadows • Foxhole Heath, Eriswell • Lord's Well Field • Newmarket Heath • Red Lodge Heath • Rex Graham Reserve • Shippea Hill • Snailwell Meadows • Soham Wet Horse Fen • Stallode Wash, Lakenheath • Upware Bridge Pit North • Upware North Pit • Wicken Fen • Wilde Street Meadow
World Heritage Sites	Neighbourhood Area + 400m due to potential impacts on setting	https://data.gov.uk/dataset/3ac5c299-6805-476b-af9b-90aadec5e7b4/world-heritage-sites-gis-data	There are no World Heritage Sites within Neighbourhood Area or 400m buffer
Registered Battlefields	Neighbourhood Area + 400m due to potential impacts on setting	https://data.gov.uk/dataset/3b327613-faa1-4d0b-8fb8-75436fed80cc/registered-battlefields-gis-data	There are no Registered Battlefields within Neighbourhood Area or 400m buffer

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Scheduled Monuments	Neighbourhood Area + 400m due to potential impacts on setting	https://historicengland.org.uk/listing/the-list/data-downloads	<p>The following Scheduled Monuments are within the Neighbourhood Area or a 400m buffer:</p> <ul style="list-style-type: none"> • Bowl barrow in Isleham Plantation* • Isleham priory: an alien Benedictine priory 100m west of St Andrew's Church • Lime kilns on E side of High Street • Moor Farm bowl barrow* <p>*Outside Neighbourhood Area, but within 400m.</p>
National Nature Reserve (NNR)	Neighbourhood Area + 8km due to potential for increased visitor pressure from new development	https://data.gov.uk/dataset/726484b0-d14e-44a3-9621-29e79fc47bfc/national-nature-reserves-england	<p>None in Neighbourhood Area. The following NNRs are located within 8km of the Neighbourhood Area:</p> <ul style="list-style-type: none"> • Cavenham Heath • Chippenham Fen • Wicken Fen
Nationally listed buildings	Neighbourhood Area + 400m due to potential impacts on setting	https://data.gov.uk/dataset/8db67112-67b0-43f2-b863-2ac9c58d52bf/listed-buildings-gis-data	<p>The following Listed Buildings are located within the Neighbourhood Area:</p> <ul style="list-style-type: none"> • Barn and Warehouse (II) • Isleham Hall (II) • Lady Peytons Almshouses (II) • 79, The Causeway (II) • 1, Mill Street (II) • 7, Church Street (II) • 10, Little London Lane (II) • 2, Sun Street (II) • War Memorial (II) • Griffin Hotel (II) • 41, Mill Street (II) • 18, Little London Lane (II) • 13, Church Street (II) • Inisfail (II) • The Corner House (II) • 18, Mill Street (II) • 24, Pound Lane (II) • Lych Gate (II) • The Rising Sun Public House (II) • Church of St Andrew (I) • 6, Sun Street (II) • Priory Church Of St Margaret Of Antioch (I) • Sunbury House (II) • Lime Kilns (II) • 10, Sun Street (II) • 12, West Street (II) • Barn,Rear Of Number 3 (Colsor) (II) • Red Lion Public House (II) • 5, Mill Street (II) • 45, Mill Street (II) • The Manor House (II) • Baptist Chapel (II) • 21, Sun Street (II) • Colsor (II) <p>Whilst the area of search included a 400m buffer around the Neighbourhood Area, there were no Listed Buildings outside the Neighbourhood Area and within 400m.</p>
Buildings at risk	Neighbourhood Area + 400m due to potential impacts on setting	https://historicengland.org.uk/listing/the-list/data-downloads	<p>There are no Heritage at Risk assets within the Neighbourhood Area or 400m buffer.</p>

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Conservation area	Neighbourhood Area + 400m due to potential impacts on setting	https://www.eastcambs.gov.uk/conservation/conservation-areas-east-cambridgeshire	Isleham Conservation Area is located within the Neighbourhood Area. There are no other CAs within the Neighbourhood Area or within a 400m buffer.
Registered Parks & Gardens	Neighbourhood Area + 400m due to potential impacts on setting	https://historicengland.org.uk/listing/the-list/data-downloads	There are no Registered Parks & Gardens within the Neighbourhood Area or within a 400m buffer.
Flood zone 3a and 3b	Neighbourhood Area	https://data.gov.uk/dataset/bcd63fc1-dd26-4685-b143-2941088923b3/flood-map-for-planning-rivers-and-sea-flood-zone-3	<ul style="list-style-type: none"> Flood Zone 1 - 44.7% of Neighbourhood Area Flood Zone 2 - 1.51% of Neighbourhood Area Flood Zone 3 - 53.79% of Neighbourhood Area
Air Quality Management	Neighbourhood Area + 8km due to potential for impacts on road network beyond Neighbourhood Area.	https://uk-air.defra.gov.uk/aqma/maps/	There are no Air Quality Management Areas within the Neighbourhood Area. The Newmarket AQMA (West Suffolk) is within 8km of the Neighbourhood Area.
Best and most versatile agricultural land	Neighbourhood Area	https://data.gov.uk/dataset/952421ec-da63-4569-817d-4d6399df40a1/provisional-agricultural-land-classification-alc	<p>The national Agricultural Land Classification dataset shows that the Neighbourhood Area consists of the following grades of agricultural land:</p> <ul style="list-style-type: none"> Grade 1 - 35.16% Grade 2 - 63.3% Grade 3 - 1.54%
Soil Types	Neighbourhood Area	https://magic.defra.gov.uk/Metadata for MAGIC/mags soilscape.html	<p>The Soilscape (England) shows a variety of soil types in the Neighbourhood Area:</p> <ul style="list-style-type: none"> Loamy And Sandy Soils With Naturally High Groundwater and a Peaty Surface; Fen Peat Soils; Shallow Lime-Rich Soils Over Chalk or Limestone; Freely Draining Lime-Rich Loamy Soils; and Freely Draining Sandy Breckland Soils.
Source Protection Zones	Neighbourhood Area	https://data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26fbbf5/source-protection-zones-merged	<p>An area in the south of the village is intersected by a Source Protection Zone, and includes:</p> <ul style="list-style-type: none"> Zone I - inner protection zone (SPZ 1 is the zone closest to the site of the well or borehole showing the area of highest risk) Zone II - outer protection Zone III - total catchment
Locally designated nature conservation site	Neighbourhood Area + 400m due to potential impacts of urbanisation	https://www.eastcambs.gov.uk/local-development-framework/east-cambridgeshire-local-plan-2015-policies-map	<p>The following County Wildlife Sites are located within the Neighbourhood Area (area of search included a 400m buffer):</p> <ul style="list-style-type: none"> Black Wing Drains Isleham Railway Cutting River Lark and Associated Habitat
Local Nature Reserves	Neighbourhood Area + 400m due to potential impacts of urbanisation	https://data.gov.uk/dataset/acdf4a9e-a115-41fb-bbe9-603c819aa7f7/local-nature-reserves-england	There are no LNRs within the Neighbourhood Area or 400m buffer.

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Irreplaceable habitats such as ancient woodland, ancient and veteran trees) and priority habitats	Neighbourhood Area + 400m due to potential impacts of urbanisation	https://naturalengland-defra.opendata.arcgis.com/datasets/priority-habitat-inventory-central-england/data?geometry=0.166%2C52.233%2C0.427%2C52.270	<p>There are no Ancient Woodlands within the Neighbourhood Area or 400m buffer. Natural England's Priority Habitat Inventory dataset indicates the following priority habitats within the Neighbourhood Area or 400m buffer:</p> <ul style="list-style-type: none"> • Coastal and floodplain grazing marsh • Deciduous woodland • Lowland calcareous grassland • Lowland fens • No main habitat but additional habitats present • Traditional orchard
Non-designated and locally listed historic environment assets	Neighbourhood Area	https://www.eastcambs.gov.uk/sites/default/files/Final%20Document%204.pdf	There are no 'Building of Local Interest' within the Neighbourhood Area.
Areas of high archaeological potential	Neighbourhood Area	<p>Data supplied by Cambridgeshire County Council's Historic Environment Record's Team.</p> <p>For full information, see Annexe I</p>	<p>The Historic Environment Team identified the following assets of archaeological significance in Isleham:</p> <ul style="list-style-type: none"> • 12-14 Sun Street, Isleham (MCB30263) - 17th century to 18th century • 19th century cemetery, Isleham (MCB22032) - 19th century • 19th century school at Isleham (MCB22024) - 19th century • 19th century structural features and undated pit at Appleyard Farm, Isleham (MCB26822) - 19th century • A probable Bronze Age ring ditch (MCB31083) - Bronze Age • Allotments at Isleham (MCB22013) - 19th century • An area of post medieval limestone quarrying (MCB31077) - Post Medieval • An area of post medieval quarrying (MCB31148) - Post Medieval • An area of post medieval quarrying (MCB31149) - Post Medieval • An area of post medieval quarrying (MCB31150) - Post Medieval • Anglo-Saxon ditches at Ellwoods Close, Isleham (MCB20918) - Saxon • Bronze socketed axehead, Isleham (11711) - Bronze Age • Early Iron Age features at Community Centre, Isleham (MCB22685) - Early Iron Age • Earthworks to N of Isleham Priory (7528) - Medieval • Flint scatter, Isleham (10862) - Lower Palaeolithic to Late Neolithic • Gardens of Isleham Hall (MCB19362) - Medieval to Modern • Griffin Hotel, Isleham (MCB22033) - 19th century • High Street Chapel, Isleham (MCB17085) - 19th century to Modern • Iron Age, Medieval and post-medieval features at Land off Fordham Road, Isleham (MCB23965) - Early Iron Age to 19th century • Iron Age, Roman and Medieval pottery at Little London Lane, Isleham (MCB19744) - Early Iron Age to 19th century • Isleham Baptist Chapel, Pound Lane (MCB17214) - 19th century to Modern • Isleham Priory/Priory Church of St. Margaret of Antioch (7529) - 12th century to Late 20th century • Limekilns, High Street, Isleham (7489) - 19th century • Medieval activity, Fordham Road, Isleham (MCB16866) - 4th century AD to Medieval

			<ul style="list-style-type: none"> • Medieval and post medieval remains, Beck Road, Isleham (MCB18442) - 12th century to 19th century • Medieval and post-medieval features at 8 Church Street, Isleham (MCB25467) - Medieval to 20th century • Medieval and Post-Medieval features, 12 West Street, Isleham (CB15283) - Lower Palaeolithic to 19th century • Medieval and post-medieval metalwork, Isleham (11712) - Medieval to 19th century • Medieval and Post-Medieval pottery at Pound Lane, Isleham (MCB19750) - Medieval to 19th century • Medieval and Post-Medieval Pottery at The Causeway, Isleham (MCB19752) - Medieval to 19th century • Medieval and undated features, Pound Lane, Isleham (MCB30346) - 12th century to 14th century • Medieval coins and tokens, East Fen, Isleham (07559A) - Medieval • Medieval ditches and pits, Pound Lane, Isleham (MCB23922) - Medieval • Medieval features at Isleham Recreation Ground (MCB20069) - Medieval to 19th century • Medieval features, Houghtons Lane, Isleham (MCB27643) - 12th century to 14th century • Medieval finds, Isleham (11074) - Medieval • Medieval pottery at Church Farm, 17 Church Lane, Isleham (MCB19712) - Medieval to 19th century • Medieval pottery from 5 Church Lane, Isleham (MCB19713) - Medieval to 19th century • Medieval Pottery from 94 The Causeway (east), Isleham (MCB19721) - Medieval • Medieval seal find, Isleham (11574) - Medieval • Medieval to Post medieval features at land to the rear of 32 and 34 Church Lane, Isleham (MCB24948) - 12th century to 19th century • Medieval to Post-Medieval features, Hall Farm, Isleham (11895) - Medieval to 19th century • Medieval-Post-Medieval pottery from 20 East Road (north), Isleham (MCB19719) - Medieval • Mesolithic antler axes, Isleham (7622) - Mesolithic • Mesolithic pit and medieval to post medieval activity at Hall Barn Road, Isleham (MCB20930) - Early Mesolithic to 19th century • Metal detecting finds, Isleham (11708) - Roman to Medieval • Middle Saxon, Medieval and post medieval features north of Houghtons Lane, Isleham (MCB25469) - Middle Saxon to 19th century • Palaeolithic handaxe, Soham Fen (MCB19231) - Palaeolithic • Pits and post hole at Isleham Priory drainage works (MCB19827) - Medieval • Possible ring ditch, Isleham (MCB27604) - Unknown • Post medieval and undated features, Sun Street, Isleham (MCB23456) - Post Medieval • Post medieval quarry features in Pound Lane, Isleham (MCB24650) - Post Medieval • Post-Medieval pottery at 20 East Road (south), Isleham (MCB19718) - Post Medieval • Post-Medieval pottery at 6 Bowers Lane, Isleham (MCB19720) - Medieval • Post-Medieval pottery at Church Street, Isleham (MCB19747) - Post Medieval • Post-Medieval Pottery at Church Street, Isleham (MCB19748) - Medieval to 19th century • Post-Medieval Pottery at East Road, Isleham (MCB19751) - Post Medieval • Post-Medieval pottery at Mill Street, Isleham (MCB19746) - Post Medieval • Post-Medieval pottery at West Street, Isleham (MCB19745) - Post Medieval
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			<ul style="list-style-type: none"> • Post-Medieval pottery from 94 The Causeway (west), Isleham (MCB19722) - Post Medieval • Post-Medieval pottery from Church Social Centre Grounds, Isleham (MCB19714) - Post Medieval • Post-medieval quarry, Isleham (11214) - Post Medieval • Prehistoric and undated features, Hall Barn Road, Isleham (CB15281) - Late Prehistoric • Prehistoric features, Hall Farm, Isleham (MCB17270) - Late Prehistoric • Prehistoric pit, Beck Road, Isleham (MCB18441) - Prehistoric • Prehistoric pit, Hall Barn Road, Isleham (CB15282) - Late Prehistoric • Prehistoric, medieval and undated pits and ditches, Fordham Road, Isleham (MCB28013) - Late Bronze Age to 19th century • Public house, Isleham (MCB22034) - 19th century • Roman and Early Medieval features at Land to the rear of 30 Church Lane, Isleham (MCB24946) - Roman to 12th century • Roman brooch, Hall Farm, Isleham (10863) - Roman • Roman brooch, Isleham (11710) - 1st century AD • Roman coins, Isleham (7559) - Roman • Roman ditches at Ellwoods Close, Isleham (MCB20917) - Roman • Roman field system, land to the rear of 32 and 34 Church Lane, Isleham (MCB20915) - Late Bronze Age to 5th century Roman • Roman saddle quern, Isleham (10864) - Roman • Romano-British remains, Hall Barn Road, Isleham (11894) - Roman • Saint Andrew's Church, Isleham (7591) - 14th century to Modern • Saxon and Medieval Pottery at St Andrews Close, Isleham (MCB19749) - Early Saxon to 19th century • Saxon disc brooch, Isleham (11691) - Early Saxon • Site of Field Farm at Isleham (MCB22026) - 19th century • Site of former allotments at Isleham (MCB22015) - 19th century • Site of former blacksmiths workshop at Isleham (MCB22020) - 19th century • Site of former blacksmiths workshop at Isleham (MCB22021) - 19th century • Site of former blacksmiths workshop at Isleham (MCB22022) - 19th century • Site of former limestone quarry at Isleham (MCB22017) - Post Medieval • Site of former limestone quarry at Isleham (MCB22018) - Post Medieval • Site of former limestone quarry at Isleham (MCB22019) - Post Medieval • Site of former malthouse at Isleham (MCB22023) - 19th century • Site of former Methodist Chapel at Isleham (MCB22031) - 19th century • Site of former windmill at Isleham (MCB22027) - 19th century • Site of Peyton's Hospital almshouses at Isleham (MCB22029) - 19th century • Site of St Bernards Wagon Works at Isleham (MCB22030) - 19th century • Site of Street Farm at Isleham (MCB22025) - 19th century • Stone mace head, Isleham (MCB16201) - Mesolithic • The Chestnuts, Isleham (MCB22028) - 19th century • Three ring ditches, Isleham (MCB17114) - Unknown • Three ring ditches, Isleham (MCB17114) - Unknown • Three ring ditches, Isleham (MCB17114) - Unknown
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			<ul style="list-style-type: none"> Two parallel linear ditches of uncertain date and function (MCB31152) - Unknown Undated and post medieval pits, West Street, Isleham (MCB22890) - Post Medieval to Modern Undated ditches and postholes, Station Road, Isleham (MCB30317) - Unknown Undated features, Wayside Farm, Fordham Road Isleham (MCB23923) - Unknown Undated pit, ditch and post hole, Appleyard Farm (MCB30872) - Unknown Undated pit, West Street, Isleham (MCB27097) - Unknown Undated, Roman and Medieval features, Coates Drove, Isleham (MCB30887) - Lower Palaeolithic to Medieval Victorian Pottery from 51 Beck Road, Isleham (MCB19715) - 19th century to Modern Wall foundations, 12 West Street, Isleham (MCB19442) - Post Medieval to Modern Windmill, Isleham (7611) - Post Medieval
Locations where air quality is monitored due to potential exceedances to air quality objectives	Neighbourhood Area	https://www.eastcambs.gov.uk/pollution/air-quality	There are no areas where air quality is monitored due to potential exceedances to air quality objectives within the Neighbourhood Area.
Areas with surface water flooding issues	Neighbourhood Area	https://www.eastcambs.gov.uk/local-development-framework/strategic-flood-risk-assessment-pslp-document-library	<ul style="list-style-type: none"> Approximately 4.12 ha (0.2%) of the Neighbourhood Area is at risk from surface water flooding in a 1 in 30-year event. Approximately 13.64 ha (0.65%) of the Neighbourhood Area is at risk from surface water flooding in a 1 in 100-year event. Approximately 95.31 ha (4.52%) of the Neighbourhood Area is at risk from surface water flooding in a 1 in 1000-year event.
Areas with significant areas of contaminated land	Neighbourhood Area	https://www.eastcambs.gov.uk/local-development-framework/strategic-flood-risk-assessment-pslp-document-library	There is a licensed landfill site within the Neighbourhood Area, located south of Isleham village at Station Road.
Locations within coastal change management areas	Neighbourhood Area + 8km due to potential for increased visitor pressure from new development	http://publications.naturalengland.org.uk/file/5869554089852928	There are no CCMA within the Neighbourhood Area or an 8km buffer
National Character Areas	Neighbourhood Area	https://data.gov.uk/dataset/21104eeb-4a53-4e41-8ada-d2d442e416e0/national-character-areas-england	NCA 46 - The Fens; and NCA 87 - East Anglian Chalk

4. Assessment

- 4.1. This section provides analysis and discussion of the likely significant environmental effects of the INP's policies and potential allocations against the environmental themes set out in the SEA Regulations, taking into account the potential environmental constraints and certain policy designations identified in Section 3.
- 4.2. The 'responsible authority' in the case of SEA and the 'competent authority' in the case of HRA, must determine whether a plan or programme (in this case the INP) is likely to have a significant environmental effect with reference to specified criteria.
- 4.3. Since data on the environmental constraints in the area has been gathered (Table 3), it is possible to determine whether there would be any likely significant effects, *positive* and / or *negative* on the environment.
- 4.4. Generally speaking, significance is an outcome of the characteristics of the impact of the policy or plan, such as its 'scale', and the 'sensitivity' of the area in which the impact is felt.
- 4.5. Determining significance is a somewhat subjective exercise. Drawing on the environmental constraints data will help to provide objectivity, and the process of consultation with statutory bodies will help to ensure that the conclusions drawn and assumptions applied are reasonable.
- 4.6. Through the inclusion of site allocation *ISL7*, the draft INP proposes a higher level of growth in Isleham than identified by the adopted Local Plan 2015 (a net increase of 30 dwellings).
- 4.7. Site *ISL7* was previously proposed for allocation by the withdrawn Local Plan, and therefore the *Habitats Regulation Assessment 2018*¹⁶ (HRA) included assessment of this site's effects on the integrity of European Sites. The HRA's findings are therefore a relevant consideration in assessing the likely significant effects of the INP on European sites.
- 4.8. Paragraphs **4.10 to 4.145** consider the likely environmental effects of the INP policies in relation to the topics set out in Annex I (f) of the SEA Directive. These are biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and includes the interaction between these factors. In addition, this section incorporates the assessment of likely significant effects of the INP policies in relation to the conservation objectives for European sites, including the potential site allocation and gives consideration to 'reasonable alternatives'.
- 4.9. **Figure 3** and **Figure 4** consider the INP against the criteria from Annex II of the SEA Directive and Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

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<https://www.eastcambs.gov.uk/sites/default/files/HRA%20Appropriate%20Assessment%20Post%20Submission%20Local%20Plan%20-%20published%2015.6.18.pdf>

Biodiversity, flora and fauna

Internationally Designated Sites

4.10. As indicated in Table 3, there are no SPAs, SACs or Ramsar sites within the Isleham Neighbourhood Area. The following *European Sites* are within 30km of Isleham parish (see **Map 4** for their location):

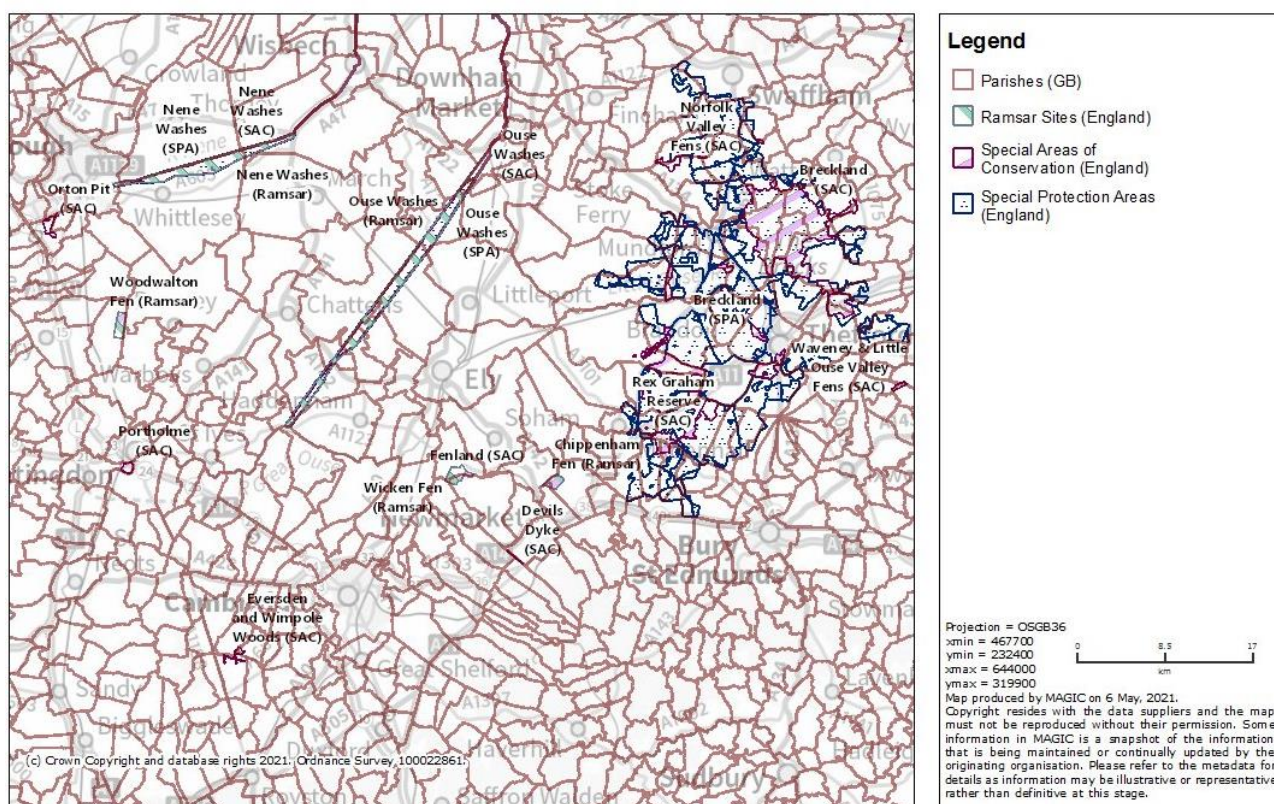
- Breckland SPA / SAC
- Fenland (Chippenham Fen) SAC / Ramsar
- Devils Dyke SAC
- Fenland (Wicken Fen) SAC / Ramsar
- Norfolk Valley Fens SAC
- Ouse Washes SPA / SAC / Ramsar
- Rex Graham Reserve SAC

4.11. There are no Proposed Ramsar sites, Possible Special Areas of Conservation, or Potential Special Protection Areas in proximity of Isleham Neighbourhood Area.

MAP 4: INTERNATIONALLY DESIGNATED SITES IN PROXIMITY OF ISLEHAM

MAGiC

Designated Sites



Habitats Regulation Assessment (June 2018)

4.12. East Cambridgeshire's latest Habitats Regulation Assessment report¹⁷ accompanied the submitted but now withdrawn Local Plan. The purpose of the HRA report was to set out the method, findings and conclusions of the Habitats Regulation Assessment (Stage 1 Screening

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<https://www.eastcambs.gov.uk/sites/default/files/HRA%20Appropriate%20Assessment%20Post%20Submission%20Local%20Plan%20-%20published%2015.6.18.pdf>

and Stage 2 Appropriate Assessment) of the now withdrawn East Cambridgeshire Local Plan. The HRA was carried out by East Cambridgeshire District Council, as the competent authority, in consultation with Natural England.

- 4.13. Despite the Local Plan having been withdrawn, this HRA continues to be considered relevant and appropriate in the context of this SEA/HRA screening assessment since it relies on more up to date evidence than the HRA which supported the Local Plan 2015, such as evidence pertaining to designated sites, the current context of recent growth, other authorities' plans and strategies, and the views of stakeholders such as the statutory environmental bodies.
- 4.14. The HRA complies with the judgement of the Court of Justice for the European Union of 12th April 2018. Through the Local Plan examination process, Natural England confirmed the HRA is legally compliant.
- 4.15. The following European sites, within and outside East Cambridgeshire's administrative boundary, were scoped into the HRA for consideration:
- Fenland SAC (including Wicken Fen, Woodwalton Fen and Chippenham Fen Ramsars)
 - Ouse Washes SAC/SPA/Ramsar
 - Devil's Dyke SAC
 - Breckland SAC/SPA
- 4.16. Other designated sites in proximity of East Cambridgeshire district were screened out at stage 1 of the Habitats Regulation Assessment.
- 4.17. The HRA was prepared to assess the effects of the now withdrawn Local Plan. The withdrawn Local Plan proposed higher growth levels than the current adopted local Plan 2015. The potential likely significant effects on designated sites arising from the withdrawn Local Plan were:
- Habitat damage and/or loss
 - Disturbance from urbanisation effects
 - Disturbance from increased recreational pressure
 - Reduced air quality as a result of increased vehicle journeys
 - Water quality changes from water consumption and abstraction
 - Reduced water quality from pollution due to increased demand for waste-water treatment
- 4.18. The withdrawn Local Plan proposed higher growth than the adopted Local Plan 2015, notably an increase from 550 to 598 dwellings per annum. The HRA 2018 tested the environmental effects of this increased level of growth on European Sites, and included a screening assessment of the INP's proposed site allocation ISL7 – previously referred to as site *ISL.H1: Land south and west of Lady Frances Court* by the withdrawn Local Plan.

Fenland SAC – Chippenham Fen

- 4.19. Chippenham Fen (part of Fenland SAC, and designated as a Ramsar, SSSI and National Nature Reserve) is located approximately 4km from Isleham village, and just 1km from the Neighbourhood Area.
- 4.20. Chippenham Fen comprises of areas of tall and often rich fen, fen grassland and basic flush that have developed over shallow peat soils. The site is in a shallow peat filled depression and is fed by rainfall and springs from the chalk aquifer. There are several ponds on the site and a system of dykes take water from the springs, in the south of the reserve, to the Chippenham

River, near its northern boundary. The Environment Agency monitors groundwater changes in the aquifer.

4.21. The HRA 2018 identifies the following pressures and threats to Chippenham Fen:

- **Increased recreational pressure:** This European site lies within the East Cambridgeshire area and Natural England have advised that the qualifying features of the site are under threat from increased visitor pressure. The screening assessment identified the potential for likely significant effects due to residential site allocations being within 8km of the site boundary of the Ramsar. These could be significant in-combination, i.e. total recreation pressure from multiple residential developments within and beyond the study area.
- **Urbanisation:** An employment allocation in Fordham (FRD.E1) is less than 400m from the site boundary of Chippenham Fen. The site's features are therefore potentially exposed to increased urbanisation pressure.
- **Water quality:** The features of this site are sensitive to water quality changes, particularly high nutrient water reaching the fen from a mixture of groundwater, rainwater and run-off.
- **Water quantity:** The features of this site are water resource sensitive, with concerns water does not seep into site compartments between ditches to the extent it once did.

4.22. The HRA 2018 provides the following screening assessment of site ISL.H1 (proposed INP allocation ISL7):

...It [Isleham] has a Water Recycling Centre that connects to Ely Ouse.

This allocation alone is unlikely to lead to a significant effect on Natura 2000 [National Sites network] sites due to the scale of development proposed. However, there is potential for increased disturbance from recreational pressure on Chippenham Fen from residential allocations in combination with one another and in-combination with housing development in neighbouring district of Forest Heath.

Chippenham Fen is vulnerable to changes in water quality and quantity. Development could lead to potential effects on these key vulnerabilities in combination with other residential allocations.

P143-4, Habitats Regulation Assessment 2018

- 4.23. At Chippenham Fen, both the site and surrounding areas are privately owned. Public access is limited to Public Rights of Way running directly through the reserve. Access to the rest of the site is permissible by permit only from Natural England, which are mainly requested by naturalists, and therefore use of the site by local residents is minimal. The nearest car parking is in the villages of Fordham or Chippenham. For the Fenland SAC sites, public access and recreational impact is not listed as a vulnerability of the sites in the SIP. However, Natural England has previously raised disturbance from increased recreational pressure as a concern in correspondence with the council.
- 4.24. As indicated in the HRA's screening assessment, due to its scale development of site ISL7 is unlikely to lead to significant effects on European Sites, including Chippenham Fen.
- 4.25. Taking into account potential in-combination effects, HRA work carried out for the Forest Heath Single Issue Review of the Core Strategy and Site Allocations Local Plan screened out Chippenham Fen Ramsar from further consideration in the Appropriate Assessment as the site was considered to have no significant vulnerability to recreation pressure, based on designated features plus pressures and threats described in the SIP.
- 4.26. The most recent South Cambridgeshire HRA Screening Report concluded no likely significant effects in relation to recreation pressure and disturbance on Chippenham Fen.

- 4.27. It is therefore reasonable to rule out likely significant effects on Fenland SAC (Chippenham Fen Ramsars) as a result of increased recreational pressure, both alone or in-combination with development within neighbouring local authorities.
- 4.28. Due to its distance from the site, proposed allocation ISL7 is not expected to have effects related to urbanisation on Chippenham Fen.
- 4.29. Anglian Water's Water Resource Management Plan (WRMP) was informed by an Appropriate Assessment which concluded that potential adverse effects on Chippenham Fen, in terms of water quantity, could be mitigated and therefore no significant adverse effects were expected on the integrity of the European site as a result of the measures proposed within the WRMP.
- 4.30. In terms of water quality, the Anglian River Basin Management Plan (RBMP) identifies a number of pressures on the water environment and sets objectives for water management. Like the HRA 2018, the *East Cambridgeshire Water Cycle Study 2017*¹⁸ (WCS) was prepared to accompany the now withdrawn Local Plan. The WCS identifies no significant effects in terms of water quality from development of site ISL.H1 (ISL7). The Appropriate Assessment of the Forest Heath Single Issue Review ruled out any adverse effects on Chippenham Fen in terms of water quality, either alone or in combination. South Cambridgeshire Local Plan HRA screening identified possible effects on the Ouse Washes SAC/Ramsar, Breckland SAC and Fenland SAC. However, it concluded an Appropriate Assessment was not needed, as there were unlikely to be significant effects as a consequence of implementing the Local Plan.
- 4.31. In conclusion, likely significant effects on the integrity of the *Fenland SAC - Chippenham Fen Ramsar* are not expected to arise from implementation of the INP, including from development of proposed site allocation ISL7.

Fenland SAC - Wicken Fen

- 4.32. Isleham Neighbourhood Area is located approximately 6.5 km from Wicken Fen SAC / Ramsar (which is also designated as a National Nature Reserve and SSSI). The HRA identified the following pressures and threats to Wicken Fen:
- **Increased recreational pressure:** The site lies within the East Cambridgeshire area and Natural England have advised that the qualifying features of the site are under threat from increased visitor pressure. The screening assessment identified the potential for likely significant effects due to residential site allocations being within 8km of the site boundary of the Ramsar. These could be significant in-combination, i.e. total recreation pressure from multiple residential developments within and beyond the study area.
 - **Water quality:** The features of this site are sensitive to water quality changes. Water quality is important for floodplain fen, which is dependent on an adequate supply of nutrients being maintained to support aquatic habitats and the range of species associated with them.
 - **Water quantity:** The features of this site are water resource sensitive.
- 4.33. The HRA 2018's screening assessment of site ISL.H1 (which is coterminous with the INP's proposed site allocation ISL7) did not identify potential effects on Wicken Fen. It is therefore reasonable to conclude that development of INP site allocation ISL7 is not likely to lead to significant effects on the integrity of Wicken Fen SAC / Ramsar.

¹⁸ <https://www.eastcambs.gov.uk/local-development-framework/water-cycle-study-pslp-document-library>

Ouse washes

- 4.34. Isleham Neighbourhood Area is located approximately 14.5 km from the Ouse Washes SAC/SPA/Ramsar. The HRA 2018 identified the following pressures and threats which could arise were the now withdrawn Local Plan implemented:
- **Physical damage/ loss of habitat:** Some site allocations within the Local Plan fall within the 'Goose and Swan Functional IRZ' for this site, recently prepared by Natural England. Land within this zone is considered to be potentially functionally linked to the Ouse Washes and therefore there is the potential for likely significant effects on the integrity of the European site.
 - **Increased recreational pressure:** This Natura 2000 site lies within the East Cambridgeshire area and Natural England have advised (see Appendix 6) that the qualifying features of the site are under threat from increased visitor pressure. The screening assessment identified the potential for likely significant effects due to residential site allocations in the Plan being within 8km of the site boundary of the SPA. These could be significant in-combination, i.e. total recreation pressure from multiple residential developments within and beyond the study area.
 - **Water quality:** The features of this site are sensitive to water quality changes, particularly inappropriate levels of nutrients from diffuse pollution in combination with inappropriate water levels.
 - **Water quantity:** The features of this site are water resource sensitive and are particular vulnerable to increased flooding.
- 4.35. The HRA 2018 also identifies that land beyond the boundary of the Ouse Washes may also provide important functional habitat for qualifying bird species. The HRA 2018 provides advice on development proposals on greenfield sites that fall within the Goose and Swan Functional Land IRZ to ensure there are no adverse effects on the qualifying species of the Ouse Washes. Isleham Neighbourhood Area is located outside of the Goose & Swan Functional Land IRZ.
- 4.36. The HRA 2018's screening assessment of site ISL.H1 (which is coterminous with the INP's proposed site allocation ISL7) did not identify potential effects on the Ouse Washes. It is therefore reasonable to conclude that development of INP site allocation ISL7 is not likely to lead to significant effects on the integrity of Ouse Washes SAC / SPA / Ramsar.

Devil's Dyke SAC

- 4.37. The Devil's Dyke, an Anglo-Saxon earthwork runs from Reach village to Woodditton. The full extent of the Devil's Dyke is over 11km long with different designations along its course. The section designated as the Devil's Dyke SAC is approximately 10 km from the boundary of the Isleham Neighbourhood Area.
- 4.38. The HRA 2018 (p16) provides the following summary of threats and pressures to Devil's Dyke SAC, relating to habitat damage or loss and recreational pressure:

This species rich calcareous grassland is vulnerable to vegetation succession by rank grasses and requires active management by grazing. It is also vulnerable to increased recreational pressure. Habitat degradation is occurring, particularly through trampling of vegetation and soil enrichment from dog excrement. Antisocial behaviour such as littering, fires and other activities is damaging vegetation. Dogs off leads also pose a risk to the continuance of the essential long-term management of the site through livestock grazing. The site is also potentially at risk from atmospheric nitrogen deposition, although the site improvement plan states this requires further investigation.

- 4.39. In addition, the HRA identifies that air pollution is a key issue for the Devil's Dyke SA, since it lies within 200m of the A14 and A1304. Natural England's Site Improvement Plan (SIP) for Devil's Dyke states: "nitrogen deposition exceeds the site-relevant critical load for ecosystem protection and hence there is a risk of harmful effects, but the sensitive features are currently considered to be in favourable condition on the site. This requires further investigation".
- 4.40. According to the SIP, Devil's Dyke SAC does not support any notified species that are sensitive to changes to water quality and/or quantity and does not list this impact as a priority pressure or threat.
- 4.41. In summary, potential pressures or threats to the Devil's Dyke SAC are:
- **Increased recreational pressure:** This European site lies within the East Cambridgeshire area and Natural England have advised that the qualifying features of the site are under threat from increased visitor pressure. The screening assessment identified the potential for likely significant effects due to residential site allocations being within 8km of the site boundary of the SAC. These could be significant in-combination, i.e. total recreation pressure from multiple residential developments within and beyond the study area.
 - **Reduced air quality:** The interest features of the SAC are sensitive to atmospheric pollutants and Devil's Dyke lies within 200m of the A14 and A1304, which may be used by new residents of site allocations in the settlements of: Bottisham, Burrough Green/ Burrough End, Dullingham, Swaffham Bulbeck, Swaffham Prior to access services and facilities in Newmarket. There is therefore potential for likely significant effects.
- 4.42. The HRA 2018's screening assessment of site ISL.H1 (ISL7) did not identify potential effects on the Devil's Dyke SAC. It is therefore reasonable to conclude that development of INP site allocation ISL7 is not likely to lead to significant effects on the integrity of the Devil's Dyke SAC.

Breckland SAC/SPA

- 4.43. Isleham Neighbourhood Area is located approximately 14 km from Breckland SAC/SPA. The HRA identified the following potential pressures and threats which could arise had the now withdrawn Local Plan been implemented:
- **Physical damage/ loss of habitat:** Site allocation KEN.M1 within the Local Plan falls within the IRZ for Breckland Farmland SSSI, a component of Breckland SPA. Land within this zone is considered to be potentially functionally linked to Breckland and therefore there is the potential for likely significant effects on the integrity of the European site.
 - **Increased recreational pressure:** Whilst the site is outside of the East Cambridgeshire area, a mixed-use site allocation at Kennett (KEN.M1) is approximately 2km from Breckland Farmland SSSI, a component of Breckland SPA and falls within the IRZ for this SSSI. The Breckland Farm SSSI has interest features that are potentially sensitive to increased recreational pressure. The screening assessment identified the potential for likely significant effects due to residential site allocations in the Plan being within 8km of the site boundary of the SPA. These could be significant in-combination, i.e. total recreation pressure from multiple residential developments within and beyond the study area.
 - **Urbanisation:** Whilst urbanisation is recognised in the SIP for Breckland SPA/SAC as a priority issue, there is no development proposed in the Local Plan within 400m of the site boundary. The Local Plan will therefore have no effect via this pathway.
- 4.44. The HRA 2018's screening assessment of site ISL.H1 (ISL7) did not identify potential effects on the Devil's Dyke SAC. It is therefore reasonable to conclude that development of INP site allocation ISL7 is not likely to lead to significant effects on the integrity of the Breckland SAC/SPA.

Potential for likely significant effects on European Sites (SEA & HRA)

- 4.45. In assessing the potential for and likelihood of effects on internationally designated sites (i.e. SACs, SPAs, Ramsars), this scoping report draws information from the East Cambridgeshire Habitats Regulation Assessment 2018, since the document remains relevant for planning purposes – with Natural England having confirmed the HRA followed accepted methodology, was in line with relevant legislation and guidance, and agreed with the conclusion of the HRA¹⁹. In addition, the withdrawn Local Plan applied a similar growth strategy to the INP, with both the withdrawn Local Plan and draft INP having identified the same site as a proposed allocation. Therefore the HRA 2018 provides assessment of proposed INP site allocation ISL7 – *Land off Fordham Rd.*
- 4.46. National planning policy states that evidence should be proportionate, and should not repeat policy assessment already undertaken. To take an alternative approach, such as preparing evidence bespoke to the INP, would be disproportionate and result in unnecessary duplication. This would be contrary to national planning policy.
- 4.47. The preceding paragraphs discuss the vulnerabilities of designated sites, and reviews the findings of the HRA 2018. **No likely significant effects on European sites are expected to arise from implementation of the INP, either alone or in combination. The consequence of this is that the INP can be ‘screened out’ for the purposes of Habitats Regulation Assessment i.e. a full HRA is not required.**
- 4.48. The consideration of likely significant effects has focussed on the effects of additional growth, namely as a result of proposed site allocation ISL7, reflecting the potential threat development poses to European Sites. This assessment draws on the analysis provided by the HRA 2018, which did not take into account mitigation measures thereby ensuring the requirements of the HRA process are complied with.
- 4.49. The INP also includes a range of policies likely to contribute *supporting* the integrity of European Sites. For example, *Policy 1a: Housing Growth* updates the Development Envelope to reflect recent and planned developments. The Development Envelope remains tightly drawn around the built area of Isleham village, with the vast majority of the Neighbourhood Area defined as open countryside where opportunities for development are very limited. The Development Envelope is therefore an important tool in managing the overall quantum of development able to come forward in the Neighbourhood Area.
- 4.50. *Policy 3: Local Green Spaces* and *Policy 9: Pedestrian Access & Public Rights of Way* protect and support provision of spaces and routes for informal recreation and leisure. Such spaces and routes could assist in reducing recreational pressure and disturbance on European Sites.
- 4.51. However, for the purposes of SEA, the effects of such policies are not considered ‘significant’.

Sites of Special Scientific Interest

- 4.52. There are no Sites of Special Scientific Interest (SSSI) within the boundary of the INP area. As indicated in table 1, the following SSSIs are located within 8km of Isleham Neighbourhood Area:
- Brackland Rough
 - Breckland Farmland
 - Breckland Forest
 - Cam Washes

¹⁹ Appendix 7, HRA 2018:

<https://www.eastcambs.gov.uk/sites/default/files/HRA%20Appropriate%20Assessment%20Post%20Submission%20Local%20Plan%20-%20published%2015.6.18.pdf>

- Cavenham - Icklingham Heaths
- Cherry Hill and The Gallops, Barton Mills
- Chippenham Fen and Snailwell Poor's Fen
- Delph Bridge Drain
- Ely Pits and Meadows
- Foxhole Heath, Eriswell
- Lord's Well Field
- Newmarket Heath
- Red Lodge Heath
- Rex Graham Reserve
- Shippea Hill
- Snailwell Meadows
- Soham Wet Horse Fen
- Stallode Wash, Lakenheath
- Upware Bridge Pit North
- Upware North Pit
- Wicken Fen
- Wilde Street Meadow

- 4.53. SSSIs are outside the scope of the HRA 2018 which covers European sites only²⁰. Effects on SSSIs were considered through Sustainability Appraisal of the *East Cambridgeshire Local Plan 2015*. However, the INP proposes a higher level of growth than the Local Plan 2015, notably though the inclusion of proposed site allocation ISL7 for 45 dwellings.
- 4.54. Table 3 shows that SSSIs provide a range of different habitat types, and are in a range of differing conditions.

²⁰ Note that some sites may benefit from European Site designation *and* other designations such as SSSI.

TABLE 4: SUMMARY OF SSSIs

SSSI	Summary of features and condition (Source: Natural England) ²¹			
Brackland Rough SSSI	Unit: 001	Habitat: Broadleaved, Mixed and	Yew Woodland - Lowland	Area: 10.69 ha Condition: Favourable
Breckland Farmland SSSI	Unit: 001	Habitat: Arable and Horticulture	Area: 289.15 ha Condition: Favourable	
	Unit: 002	Habitat: Arable and Horticulture	Area: 236.24 ha Condition: Favourable	
	Unit: 003	Habitat: Arable and Horticulture	Area: 84.42 ha Condition: Favourable	
	Unit: 004	Habitat: Arable and Horticulture	Area: 1672.21 ha Condition: Favourable	
	Unit: 005	Habitat: Arable and Horticulture	Area: 140.44 ha Condition: Favourable	
	Unit: 006	Habitat: Arable and Horticulture	Area: 267.12 ha Condition: Favourable	
	Unit: 007	Habitat: Arable and Horticulture	Area: 7.75 ha Condition: Favourable	
	Unit: 008	Habitat: Arable and Horticulture	Area: 63.01 ha Condition: Favourable	
	Unit: 009	Habitat: Arable and Horticulture	Area: 558.6 ha Condition: Favourable	
	Unit: 010	Habitat: Arable and Horticulture	Area: 104.65 ha Condition: Favourable	
	Unit: 011	Habitat: Arable and Horticulture	Area: 62.22 ha Condition: Favourable	
	Unit: 012	Habitat: Arable and Horticulture	Area: 56.73 ha Condition: Favourable	
	Unit: 013	Habitat: Arable and Horticulture	Area: 10.15 ha Condition: Favourable	
	Unit: 014	Habitat: Arable and Horticulture	Area: 98.49 ha Condition: Favourable	
	Unit: 015	Habitat: Arable and Horticulture	Area: 379.43 ha Condition: Favourable	
	Unit: 016	Habitat: Arable and Horticulture	Area: 45.94 ha Condition: Favourable	
	Unit: 017	Habitat: Arable and Horticulture	Area: 44.29 ha Condition: Favourable	
	Unit: 018	Habitat: Arable and Horticulture	Area: 86.6 ha Condition: Favourable	
	Unit: 019	Habitat: Arable and Horticulture	Area: 199.2 ha Condition: Favourable	
	Unit: 020	Habitat: Arable and Horticulture	Area: 44.19 ha Condition: Favourable	
	Unit: 021	Habitat: Arable and Horticulture	Area: 138.47 ha Condition: Favourable	
	Unit: 022	Habitat: Arable and Horticulture	Area: 41.51 ha Condition: Favourable	
	Unit: 023	Habitat: Arable and Horticulture	Area: 215.47 ha Condition: Favourable	
	Unit: 024	Habitat: Arable and Horticulture	Area: 115.27 ha Condition: Favourable	
	Unit: 025	Habitat: Arable and Horticulture	Area: 406.84 ha Condition: Favourable	
	Unit: 026	Habitat: Arable and Horticulture	Area: 217.69 ha Condition: Favourable	
	Unit: 027	Habitat: Arable and Horticulture	Area: 321.9 ha Condition: Favourable	
	Unit: 028	Habitat: Arable and Horticulture	Area: 3071.13 ha Condition: Favourable	
	Unit: 029	Habitat: Arable and Horticulture	Area: 63.01 ha Condition: Favourable	
	Unit: 030	Habitat: Arable and Horticulture	Area: 100.69 ha Condition: Favourable	
	Unit: 031	Habitat: Arable and Horticulture	Area: 242.01 ha Condition: Favourable	
	Unit: 032	Habitat: Arable and Horticulture	Area: 24.6 ha Condition: Favourable	
	Unit: 033	Habitat: Arable and Horticulture	Area: 210.36 ha Condition: Favourable	
	Unit: 034	Habitat: Arable and Horticulture	Area: 102.84 ha Condition: Favourable	
	Unit: 035	Habitat: Arable and Horticulture	Area: 202.63 ha Condition: Favourable	
	Unit: 036	Habitat: Arable and Horticulture	Area: 14.12 ha Condition: Favourable	
	Unit: 037	Habitat: Arable and Horticulture	Area: 172.67 ha Condition: Favourable	
	Unit: 038	Habitat: Arable and Horticulture	Area: 9.46 ha Condition: Favourable	
	Unit: 039	Habitat: Arable and Horticulture	Area: 1.9 ha Condition: Favourable	
	Unit: 040	Habitat: Arable and Horticulture	Area: 0.65 ha Condition: Favourable	
	Unit: 041	Habitat: Arable and Horticulture	Area: 26.93 ha Condition: Favourable	
	Unit: 042	Habitat: Arable and Horticulture	Area: 108.4 ha Condition: Favourable	
	Unit: 043	Habitat: Arable and Horticulture	Area: 7.39 ha Condition: Favourable	
	Unit: 044	Habitat: Arable and Horticulture	Area: 225.05 ha Condition: Favourable	
	Unit: 045	Habitat: Arable and Horticulture	Area: 757.24 ha Condition: Favourable	
	Unit: 046	Habitat: Arable and Horticulture	Area: 54.75 ha Condition: Favourable	
	Unit: 047	Habitat: Arable and Horticulture	Area: 138.1 ha Condition: Favourable	
	Unit: 048	Habitat: Arable and Horticulture	Area: 48.12 ha Condition: Favourable	
	Unit: 049	Habitat: Arable and Horticulture	Area: 55.5 ha Condition: Favourable	
	Unit: 050	Habitat: Arable and Horticulture	Area: 45.82 ha Condition: Favourable	
	Unit: 051	Habitat: Arable and Horticulture	Area: 692.42 ha Condition: Favourable	
	Unit: 052	Habitat: Arable and Horticulture	Area: 265.22 ha Condition: Favourable	
	Unit: 053	Habitat: Arable and Horticulture	Area: 74.28 ha Condition: Favourable	
	Unit: 054	Habitat: Arable and Horticulture	Area: 22.75 ha Condition: Favourable	
	Unit: 055	Habitat: Arable and Horticulture	Area: 110.96 ha Condition: Favourable	
	Unit: 056	Habitat: Arable and Horticulture	Area: 71.27 ha Condition: Favourable	
	Unit: 057	Habitat: Arable and Horticulture	Area: 1.29 ha Condition: Favourable	
	Unit: 058	Habitat: Arable and Horticulture	Area: 1.52 ha Condition: Favourable	
	Unit: 059	Habitat: Arable and Horticulture	Area: 2.21 ha Condition: Favourable	
	Unit: 060	Habitat: Arable and Horticulture	Area: 3.04 ha Condition: Favourable	
	Unit: 061	Habitat: Arable and Horticulture	Area: 1.77 ha Condition: Favourable	
	Unit: 062	Habitat: Arable and Horticulture	Area: 3.72 ha Condition: Favourable	
	Unit: 063	Habitat: Arable and Horticulture	Area: 257.53 ha Condition: Favourable	
	Unit: 064	Habitat: Arable and Horticulture	Area: 16.18 ha Condition: Favourable	
	Unit: 065	Habitat: Arable and Horticulture	Area: 31.5 ha Condition: Favourable	
	Unit: 066	Habitat: Arable and Horticulture	Area: 62.06 ha Condition: Favourable	
	Unit: 067	Habitat: Arable and Horticulture	Area: 136.11 ha Condition: Favourable	
	Unit: 068	Habitat: Arable and Horticulture	Area: 0.15 ha Condition: Favourable	
	Unit: 069	Habitat: Arable and Horticulture	Area: 41.36 ha Condition: Favourable	
	Unit: 070	Habitat: Arable and Horticulture	Area: 7.29 ha Condition: Favourable	
Breckland Forest SSSI	Unit: 001	Habitat: Coniferous Woodland	Area: 4567.35 ha Condition: Unfavourable - Recovering	

²¹ <https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>

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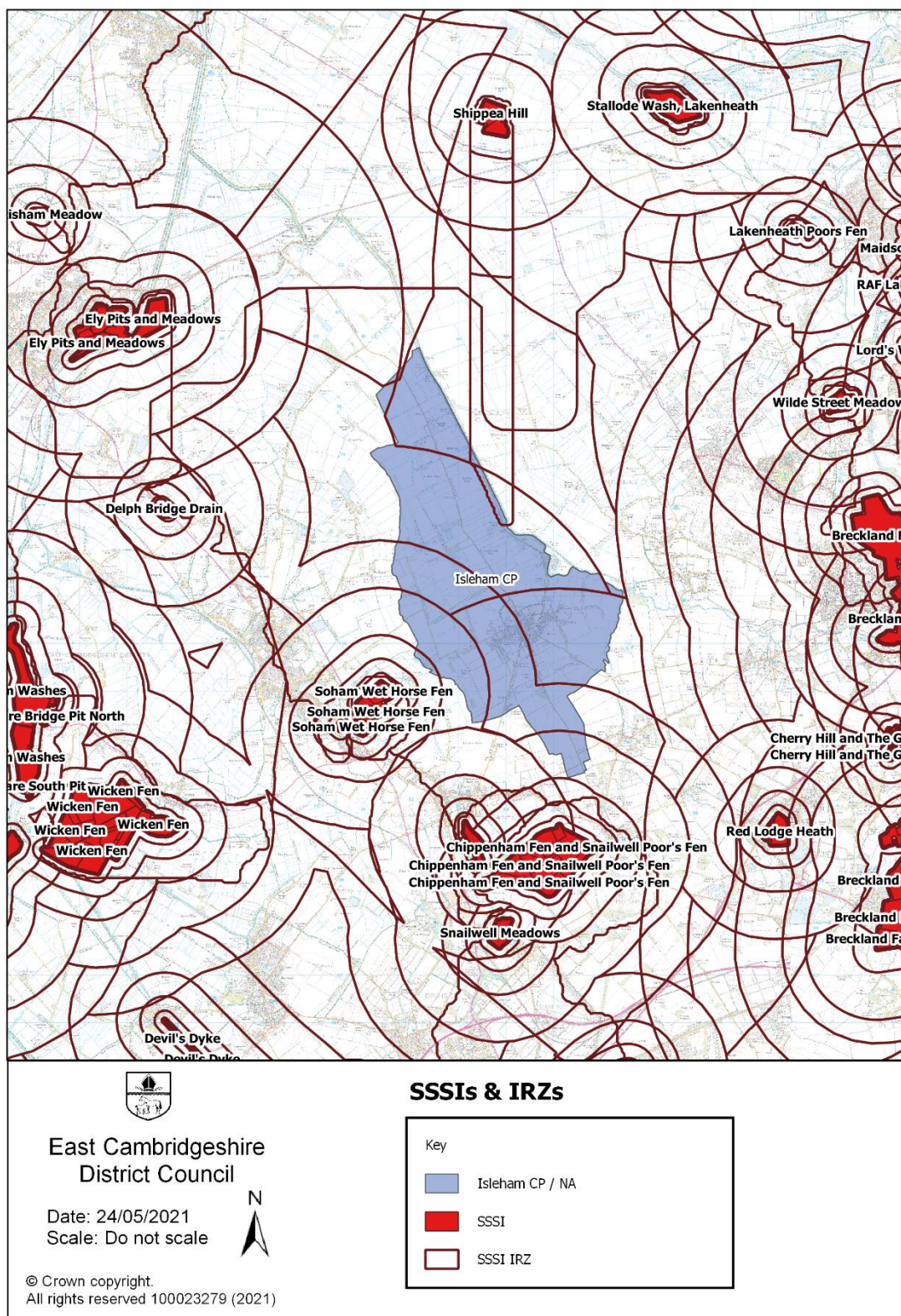
	Unit: 002 Habitat: Coniferous Woodland Area: 1815.56 ha Condition: Unfavourable - Recovering Unit: 003 Habitat: Coniferous Woodland Area: 1025.89 ha Condition: Unfavourable - Recovering Unit: 004 Habitat: Coniferous Woodland Area: 10700.78 ha Condition: Unfavourable - Recovering Unit: 005 Habitat: Earth Heritage Area: 0.48 ha Condition: Favourable Unit: 006 Habitat: Earth Heritage Area: 9.06 ha Condition: Favourable Unit: 007 Habitat: Earth Heritage Area: 6.68 ha Condition: Favourable
Cam Washes SSSI	Unit: 001 Habitat: Fen, Marsh and Swamp - Lowland Area: 62.6 ha Condition: Favourable Unit: 002 Habitat: Fen, Marsh and Swamp - Lowland Area: 43.56 ha Condition: Unfavourable - No Change Unit: 003 Habitat: Fen, Marsh and Swamp - Lowland Area: 60.36 ha Condition: Favourable
Cavenham - Icklingham Heaths SSSI	Unit: 001 Habitat: Acid Grassland - Lowland Area: 0.36 ha Condition: Favourable Unit: 002 Habitat: Acid Grassland - Lowland Area: 60.79 ha Condition: Favourable Unit: 003 Habitat: Acid Grassland - Lowland Area: 0.4 ha Condition: Favourable Unit: 004 Habitat: Acid Grassland - Lowland Area: 56.57 ha Condition: Unfavourable - Recovering Unit: 005 Habitat: Fen, Marsh and Swamp - Lowland Area: 26.45 ha Condition: Unfavourable - Recovering Unit: 006 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 7.02 ha Condition: Unfavourable - Recovering Unit: 007 Habitat: Fen, Marsh and Swamp - Lowland Area: 17.92 ha Condition: Unfavourable - Recovering Unit: 010 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 6.56 ha Condition: Favourable Unit: 011 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 42.56 ha Condition: Unfavourable - Recovering Unit: 012 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 5.29 ha Condition: Favourable Unit: 013 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 5.23 ha Condition: Favourable Unit: 014 Habitat: Fen, Marsh and Swamp - Lowland Area: 9.01 ha Condition: Unfavourable - Recovering Unit: 015 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 6.18 ha Condition: Favourable Unit: 016 Habitat: Fen, Marsh and Swamp - Lowland Area: 10.85 ha Condition: Unfavourable - Recovering Unit: 017 Habitat: Acid Grassland - Lowland Area: 21.61 ha Condition: Unfavourable - Recovering Unit: 018 Habitat: Acid Grassland - Lowland Area: 24.89 ha Condition: Unfavourable - Recovering Unit: 019 Habitat: Acid Grassland - Lowland Area: 14.97 ha Condition: Favourable Unit: 020 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 5.85 ha Condition: Favourable Unit: 021 Habitat: Dwarf Shrub Heath - Lowland Area: 34.75 ha Condition: Unfavourable - Recovering Unit: 022 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 2.69 ha Condition: Favourable Unit: 023 Habitat: Acid Grassland - Lowland Area: 10.87 ha Condition: Destroyed Unit: 024 Habitat: Fen, Marsh and Swamp - Lowland Area: 7.45 ha Condition: Unfavourable - No change Unit: 025 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 2.27 ha Condition: Favourable Unit: 026 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 5.18 ha Condition: Favourable Unit: 029 Habitat: Acid Grassland - Lowland Area: 20.87 ha Condition: Unfavourable - Recovering Unit: 031 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 2.27 ha Condition: Favourable Unit: 032 Habitat: Fen, Marsh and Swamp - Lowland Area: 10.16 ha Condition: Favourable
Cherry Hill and The Gallops, Barton Mills SSSI	Unit: 006 Habitat: Arable and Horticulture Area: 0.54 ha Condition: Unfavourable - Recovering Unit: 007 Habitat: Calcareous Grassland - Lowland Area: 2.07 ha Condition: Unfavourable - Declining Unit: 008 Habitat: Arable and Horticulture Area: 7.74 ha Condition: Unfavourable - Recovering
Chippenham Fen and Snailwell Poor's Fen SSSI	Unit: 001 Habitat: Fen, Marsh and Swamp - Lowland Area: 17.69 ha Condition: Favourable Unit: 002 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 7.43 ha Condition: Favourable Unit: 003 Habitat: Fen, Marsh and Swamp - Lowland Area: 13.46 ha Condition: Favourable Unit: 004 Habitat: Fen, Marsh and Swamp - Lowland Area: 3.78 ha Condition: Favourable Unit: 005 Habitat: Fen, Marsh and Swamp - Lowland Area: 4.72 ha Condition: Favourable Unit: 007 Habitat: Fen, Marsh and Swamp - Lowland Area: 3.38 ha Condition: Favourable Unit: 008 Habitat: Fen, Marsh and Swamp - Lowland Area: 10.12 ha Condition: Unfavourable - Recovering Unit: 009 Habitat: Fen, Marsh and Swamp - Lowland Area: 10.05 ha Condition: Favourable Unit: 010 Habitat: Fen, Marsh and Swamp - Lowland Area: 3.9 ha Condition: Favourable Unit: 013 Habitat: Fen, Marsh and Swamp - Lowland Area: 5.38 ha Condition: Favourable Unit: 014 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 1.28 ha Condition: Favourable Unit: 017 Habitat: Fen, Marsh and Swamp - Lowland Area: 5.02 ha Condition: Unfavourable - Recovering Unit: 018 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 22.34 ha Condition: Favourable Unit: 019 Habitat: Broadleaved, Mixed and Yew Woodland - Lowland Area: 27.61 ha Condition: Favourable Unit: 020 Habitat: Neutral Grassland - Lowland Area: 19.7 ha Condition: Favourable
Delph Bridge Drain SSSI	Unit: 001 Habitat: Standing Open Water and Canals Area: 0.15 ha Condition: Favourable
Ely Pits and Meadows SSSI	Unit: 001 Habitat: Earth Heritage Area: 3.18 ha Condition: Favourable Unit: 002 Habitat: Earth Heritage Area: 0.76 ha Condition: Favourable Unit: 003 Habitat: Earth Heritage Area: 3.37 ha Condition: Favourable Unit: 004 Habitat: Standing Open Water and Canals Area: 4.62 ha Condition: Favourable Unit: 005 Habitat: Standing Open Water and Canals Area: 16.3 ha Condition: Favourable Unit: 006 Habitat: Standing Open Water and Canals Area: 3.68 ha Condition: Favourable Unit: 007 Habitat: Standing Open Water and Canals Area: 9.37 ha Condition: Favourable Unit: 008 Habitat: Standing Open Water and Canals Area: 28.81 ha Condition: Favourable Unit: 009 Habitat: Fen, Marsh and Swamp - Lowland Area: 15.76 ha Condition: Favourable
Foxhole Heath, Eriswell SSSI	Unit: 001 Habitat: Calcareous Grassland - Lowland Area: 85.17 ha Condition: Favourable
Lord's Well Field SSSI	Unit: 001 Habitat: Acid Grassland - Lowland Area: 3.25 ha Condition: Unfavourable - Declining
Newmarket Heath SSSI	Unit: 001 Habitat: Calcareous Grassland - Lowland Area: 244.26 Ha Condition: Favourable Unit: 002 Habitat: Calcareous Grassland - Lowland Area: 35.04 Ha Condition: Unfavourable - Recovering
Red Lodge Heath SSSI	Unit: 001 Habitat: Acid Grassland - Lowland Area: 4.75 ha Condition: Unfavourable - Recovering Unit: 004 Habitat: Acid Grassland - Lowland Area: 16.05 ha Condition: Unfavourable - Recovering
Rex Graham Reserve SSSI	Unit: 001 Habitat: Calcareous Grassland - Lowland Area: 2.76 ha Condition: Favourable
Shippea Hill SSSI	Unit: 001 Habitat: Earth Heritage Area: 17.55 ha Condition: Favourable Unit: 002 Habitat: Earth Heritage Area: 10.09 ha Condition: Favourable
Snailwell Meadows SSSI	Unit: 001 Habitat: Neutral Grassland - Lowland Area: 14.82 Ha Condition: Unfavourable - Recovering
Soham Wet Horse Fen SSSI	Unit: 001 Habitat: Neutral Grassland - Lowland Area: 8.49 ha Condition: Unfavourable - Recovering

	Unit: 002	Habitat: Neutral Grassland - Lowland	Area: 1.18 ha	Condition: Unfavourable - Recovering
	Unit: 003	Habitat: Neutral Grassland - Lowland	Area: 6.26 ha	Condition: Unfavourable - Recovering
	Unit: 004	Habitat: Neutral Grassland - Lowland	Area: 5.42 ha	Condition: Unfavourable - Recovering
	Unit: 005	Habitat: Neutral Grassland - Lowland	Area: 3.89 ha	Condition: Favourable
	Unit: 006	Habitat: Neutral Grassland - Lowland	Area: 8.56 ha	Condition: Unfavourable - Recovering
Stallode Wash, Lakenheath SSSI	Unit: 001	Habitat: Fen, Marsh and Swamp - Lowland	Area: 34.06 ha	Condition: Unfavourable - Recovering
Upware Bridge Pit North SSSI	Unit: 001	Habitat: Standing Open Water and Canals	Area: 1.08 Ha	Condition: Unfavourable - Recovering
Upware North Pit SSSI	Unit: 001	Habitat: Standing Open Water and Canals	Area: 1.08 Ha	Condition: Unfavourable - Recovering
Wicken Fen SSSI	Unit: 001	Habitat: Fen, Marsh and Swamp - Lowland	Area: 66.28 Ha	Condition: Unfavourable - Recovering
	Unit: 002	Habitat: Fen, Marsh and Swamp - Lowland	Area: 68.68 Ha	Condition: Unfavourable - Recovering
	Unit: 003	Habitat: Fen, Marsh and Swamp - Lowland	Area: 27.39 Ha	Condition: Favourable
	Unit: 004	Habitat: Fen, Marsh and Swamp - Lowland	Area: 86.87 Ha	Condition: Favourable
	Unit: 005	Habitat: Standing Open Water and Canals	Area: 5.26 Ha	Condition: Favourable
Wilde Street Meadow SSSI	Unit: 001	Habitat: Neutral Grassland - Lowland	Area: 11.59 ha	Condition: Favourable

SSSI Impact Risk Zones

- 4.55. SSSI Impact Risk Zones (IRZs) are a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts.
- 4.56. There are several SSSI Impact Risk Zones (IRZs) that extend into the Isleham Neighbourhood Area (see **Map 5**), which appears to include IRZs relating to Chippenham Fen and Snailwell Poor's Fen SSSI, Delph Bridge Drain SSSI, Ely Pits and Meadows SSSI, Shippea Hill SSSI, and Soham Wet Horse Fen SSSI. IRZs cover all land within the Isleham Neighbourhood Area.

MAP 5: SSSIs & IRZs IN PROXIMITY OF ISLEHAM NEIGHBOURHOOD AREA



- 4.57. An area at the south west of the Isleham Neighbourhood Area appears to emanate from Soham Wet Horse Fen and requires residential developments of 100 dwellings or more (or 50 dwellings outside existing settlements/urban areas) to consult Natural England. In all other areas within the parish, the SSSI IRZ tool indicates that there is no requirement to consult Natural England on residential proposals – rather, the IRZs requirement development

proposals for a range of other forms of development, such as infrastructure, mineral workings, industrial or agricultural processes likely to lead to air pollution, waste, combustion composting and water supply infrastructure.

- 4.58. Notably, proposed site allocation ISL7 (for the development of approximately 45 dwellings) falls within an IRZ which does not require Natural England to be consulted for residential developments. This suggests there is no potential for adverse impacts on SSSIs as a result of residential development of site ISL7.
- 4.59. To identify SSSIs potentially at risk from development within the Neighbourhood Area, an area of search of 8km from the Neighbourhood Area was applied (see Table 3). The 8km distance metric was applied due to the potential threat to the integrity of SSSIs from increased recreational pressure / visitor disturbance as a result of new development. In addition, new development in close proximity to a SSSI presents a risk due to issues relating to urbanisation (predation from cats, fly-tipping, air quality, etc.). However, there are no SSSIs within the Isleham Neighbourhood Area.
- 4.60. A number of IRZs intersect the Isleham Neighbourhood Area. However, at the location of proposed site allocation ISL7, there is no requirement to consult Natural England on proposals for residential development. **As such, it is reasonable to conclude that no significant effects on SSSIs are likely to arise as a result of implementation of the INP.**

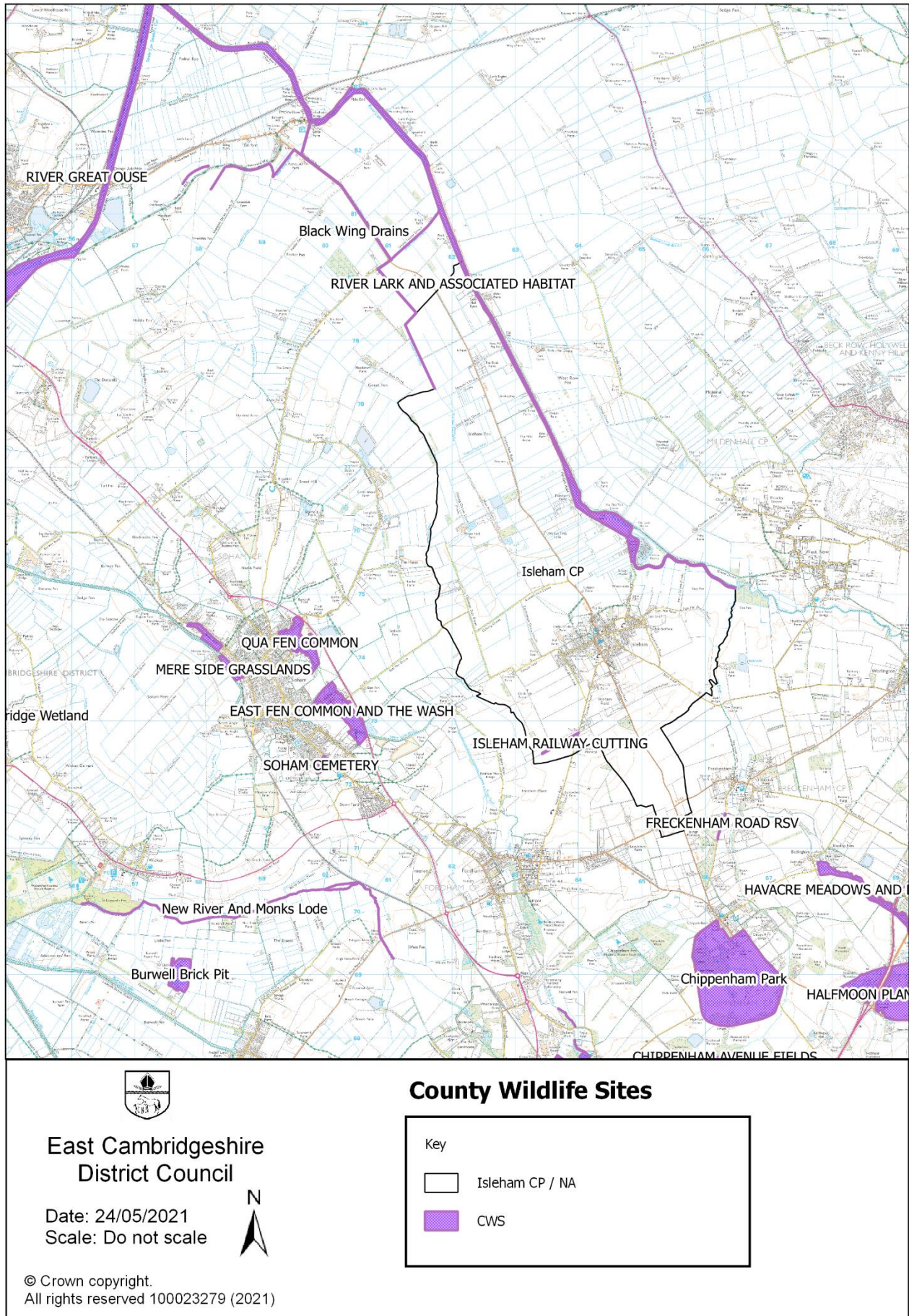
National Nature Reserves

- 4.61. As indicated in Table 3, there are no national Nature Reserves (NNR) in the Neighbourhood Area.
- 4.62. Cavenham Heath NNR is located just under 8km from the Isleham Neighbourhood Area. Cavenham Heath lies within the Breckland SPA/SAC, and within the *Cavenham – Icklingham Heaths* SSSI.
- 4.63. Chippenham Fen NNR falls within the *Fenland SAC – Chippenham Fen Ramsar and Chippenham Fen and Snailwell Poor's Fen* SSSI. Similarly, Wicken Fen NNR is located within *Fenland SAC – Wicken Fen Ramsar and Wicken Fen* SSSI.
- 4.64. Since each NNR benefits from designation as a European Site and SSSI, the effects of the INP have already been considered in preceding paragraphs. Reflecting the assessment of likely effects on European Sites and SSSIs, **it is concluded that no likely significant effects on NNRs are likely to occur from implementation of the NP.**

Locally Designated Sites

- 4.65. There are no Local Nature Reserves within the INP area or a 400m buffer (see Table 3).
- 4.66. There are 3 County Wildlife Sites within the boundary of the INP area or 400m buffer (see **Map 6**) – River Lark and Associated Habitat CWS, Black Wing Drains CWS, and Isleham Railway Cutting CWS.

MAP 6: COUNTY WILDLIFE SITES IN PROXIMITY OF ISLEHAM



- 4.67. New development poses a potential threat to CWSs, which may be vulnerable to impacts of urbanisation (for example fly tipping, vandalism, litter, increased risk of fire and cat predation) and increased recreational pressure (with potential impacts such as trampling, eutrophication (dog fouling) and habitat damage).
- 4.68. The INP does not propose growth in immediate proximity of a CWS. The INP's proposed site allocation ISL7 is located approximately 1.5km from the *River Lark and Associated Habitat* CWS and therefore urbanising effects on the CWS as a result of development of site ISL7 are not expected to occur.
- 4.69. Data on the sensitivities and vulnerabilities of specific CWSs is not directly available at the time of preparing this scoping report. Through allocation of site ISL7, the INP provides a development opportunity for an additional 30 net dwellings beyond the Local Plan. Whilst a relatively modest level of growth, in the absence of available information, it is not possible to rule out effects on County Wildlife Sites (for example in terms of visitor disturbance / recreational pressure).
- 4.70. **Since likely significant effects on County Wildlife Sites cannot currently be ruled out, it is necessary to 'screen in' the INP for SEA.**

INP Draft policies

- 4.71. The INP seeks to conserve and enhance biodiversity, as evident through Objective 5:
that the natural landscape including footpaths, green spaces and valued views will be protected and where wildlife and habitats are able to flourish
- 4.72. There are a number of policies in the INP that seek to protect and enhance biodiversity and habitats. Notably, *Policy 1a* updates the Development Envelope thereby concentrating development within Isleham village, and strictly limits growth in the surrounding countryside. The Development Envelope therefore plays an important role in managing development within the Neighbourhood Area, directing development to the existing built area, and away from habitats and natural features.
- 4.73. *Policy 7: Wildlife & Habitats* requires development proposals to contribute to meeting the government's 25-year plan for the environment; enhance connectivity of green networks through the inclusion of strong landscaping schemes; and avoid the loss of wildlife habitats or natural features such as trees, hedgerows, watercourses or ponds. The policy encourages proposals to provide an overall net gain in biodiversity, and where the loss of a feature is unavoidable supports the use of mitigation measures.
- 4.74. *Policy 3: Local Green Spaces* designates 13 green areas as Local Green Spaces, providing protection from development in accordance with national policy for Green Belts, and supporting biodiversity and providing opportunities for informal recreation.
- 4.75. Development opportunities in the INP are broadly aligned with the Local Plan, with the exception of site allocation ISL7 which provides an opportunity for net additional growth of approximately 30 dwellings.
- 4.76. The potential effects of the proposed site allocation were tested by the HRA 2018. Applying the HRA's findings to the INP, it is reasonable to conclude that **no likely significant effects on internationally designated sites (European sites) are expected to arise from implementation of the INP, either alone or in combination. As such, a full Habitats Regulation is not required and the INP is screened out for HRA purposes.**
- 4.77. However, in the absence of available data, it is not possible to rule out likely significant effects on County Wildlife Sites. As such, further investigation is required through a full Strategic Environmental Assessment – **the INP is 'screened in' for SEA.**

Population

- 4.78. Isleham parish had 2,378 usual residents as at Census day 2011²². The Office for National Statistics estimated that the parish population in mid-2018 was 2,441 persons²³ - or an average population density of 1.15 persons per ha.
- 4.79. The Census 2011 data shows there were 953 households in Isleham parish at 2011, of which 72.8% were owned outright or owned with a mortgage or loan. At the time of the Census 2011, Isleham had an average household size of 2.5 people per household. This is higher than the East Cambridgeshire average of 2.34 people per household.
- 4.80. The mean age of the population living in the parish of Isleham at the time of the Census 2011 was 40.4 years. This is higher than the national average of 39.3 years and the average for East Cambridgeshire of 40.2 years. There were 395 residents aged 65 and over living within the INP area.
- 4.81. At the time of the Census 2011, 8% of all households in Isleham had no cars or vans in the household. This is lower than the average figure for East Cambridgeshire (13.0%) and England (25.8%).
- 4.82. *Policy 1a: Housing Growth* identifies a range of development opportunities thereby enabling the delivery of new homes to meet local needs, including small-scale infill and windfall developments within the Development Envelope; development of approximately 45 dwellings at the INP's site allocation 'Land off Fordham Rd' (site ISL7); and rural affordable housing exception site development.
- 4.83. *Policy 1b: Housing Types* requires development proposals to provide a mix of house types and sizes, and favours proposals which provide two bedroomed dwellings, that meet the needs of an ageing population, and are suitable for lifetime occupation. The policy supports the provision of affordable housing, requiring on-site provision of affordable housing, and requires the development of Rural Exception Sites to meet local needs by prioritising households with a local connection.
- 4.84. The INP includes policies which are likely to positively contribute to meeting the housing needs of the population by creating an additional opportunity for housing development through site allocation ISL7, and ensuring new homes reflect local needs. Overall, the policies are fairly limited in their scale and scope and **are considered not likely to have significant effects on the population.**

Human health

- 4.85. In terms of the health of the population living within the INP, at the time of the Census 2011, 49.4% of the population of Isleham described their health as 'very good' and 35.3% as 'good'²⁴.
- 4.86. Whilst the INP includes no specific objective addressing human health, objective 3 aims to ensure Isleham will be a "...place where everyone; feels safe, welcomed, experiences positive wellbeing...".
- 4.87. *Policy 9: Pedestrian Access & Public Rights of Way* favours proposals which increase pedestrian access and extend the public rights of way network. Whilst *Policy 3: Local Green Spaces* designates 13 green areas for protection from development, many of which provide

²² <http://www.nomisweb.co.uk/reports/localarea?compare=E04001633>

²³ <https://cambridgeshireinsight.org.uk/parish-profile/?geographyId=7f94ea12b8914d3cb0c0c29bc9ad1767&featureId=E04001633>

²⁴ <https://cambridgeshireinsight.org.uk/parish-profile/?geographyId=7f94ea12b8914d3cb0c0c29bc9ad1767&featureId=E04001633#health>

opportunities for informal and formal recreation. Such measures could encourage healthy lifestyles.

- 4.88. The INP includes policies which are likely to provide some positive enhancement to human health. Through implementation of the INP, **no likely significant effects are expected to arise in respect of human health.**

Soil

- 4.89. The Soilscape (England) dataset is based on the National Soil Map of England and Wales (NATMAPvector)²⁵. The soil map shows a variety of soil types in the parish, as illustrated on

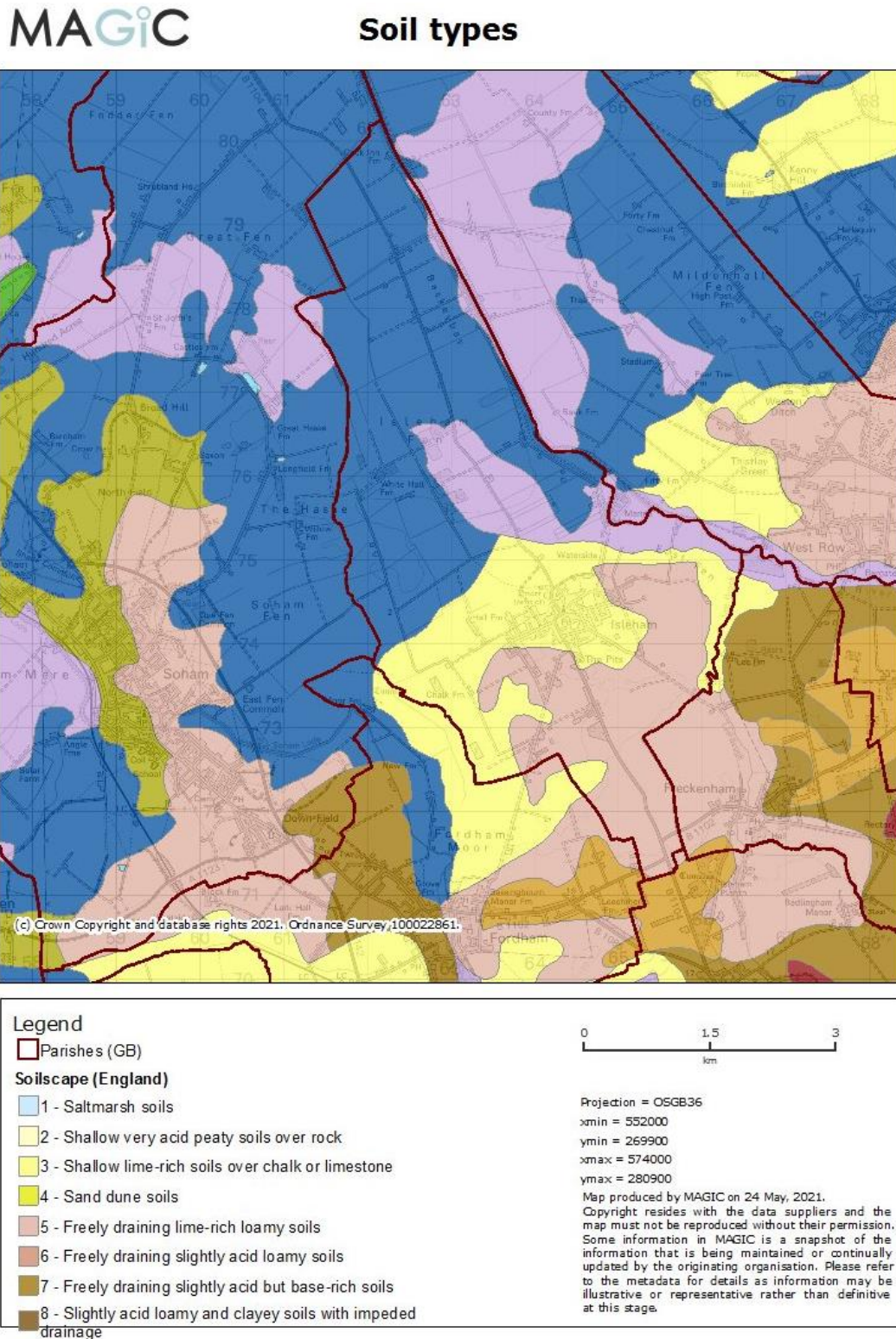
Map 4. The INP area includes the following soil types:

- Loamy and Sandy Soils with Naturally High Groundwater and a Peaty Surface;
- Fen Peat Soils;
- Shallow Lime-Rich Soils Over Chalk or Limestone;
- Freely Draining Lime-Rich Loamy Soils; and
- Freely Draining Sandy Breckland Soils.

- 4.90. The distribution of soil types broadly reflects the INP area's transition from its fen landscape in the north of the parish to East Anglian Chalk in the south.

²⁵ <https://magic.defra.gov.uk/MagicMap.aspx>

MAP 7: SOIL TYPES IN ISLEHAM



4.91. The INP recognises how its soils have influenced its agricultural heritage, and notes the relationship between soil types and the landscapes and biodiversity within the Neighbourhood Area:

“...Isleham sits at the intersection of three contrasting areas of soil type and underlying geology. This sets the framework for its varied and in some cases special wildlife...”

- 4.92. The national *Agricultural Land Classification* dataset²⁶ shows that the Neighbourhood Area consists of the following grades of agricultural land:
- 35.16% - Grade 1 (excellent quality agricultural land with no or very minor limitations);
 - 63.3% - Grade 2 (very good quality agricultural land with minor limitations which affect crop yield, cultivations or harvesting);
 - 1.54% - Grade 3 (good quality agricultural land with moderate limitations / moderate quality agricultural land with strong limitations).
- 4.93. The best and most versatile land is defined as Grades 1, 2 and 3a. The ALC data does not distinguish between grades 3a and 3b (instead simply referring to Grade 3). More detailed assessment would be required to identify subgrades 3a and 3b.
- 4.94. Grade 1 land is located toward the north of the parish, corresponding with the location of peat and fen soils. However, since all land falls principally within Grades 1 and 2 (with a very small amount of Grade 3 land), it is reasonable to assume that all undeveloped land in the parish constitutes 'best and most versatile agricultural land'.
- 4.95. The proposed site allocation (*site ISL7*) adjoins the built area of the village, is located on Grade 2 agricultural land and does not affect peat soil resources. Since there are no areas of poor-quality agricultural land or significant brownfield or urban sites available for redevelopment within the INP area, there are no sequentially preferable sites within the Neighbourhood Area. Therefore, soil type and agricultural land data is not significant in identifying 'reasonable alternatives' for potential allocations.
- 4.96. Through limiting development in the open countryside (Policy 1a), the INP is likely to play a positive contribution in protecting best and most versatile agricultural land and peat soils but, **in the context of soil, no likely significant effects are expected to arise through implementation of the INP.**

Water

Catchment and water environment

- 4.97. In terms of the water environment, the INP area falls within the Environment Agency's Cam and Ely Ouse Management Catchment²⁷.
- 4.98. The River Lark and Lee Brook forms much of the eastern boundary of the Neighbourhood Area. The River Lark (as part of the Ely Ouse (South Level) and Lee Brook are monitored by the Environment Agency for their chemical and ecological status, and are currently classified as 'moderate' (base date 2019).

Fluvial Flood Risk

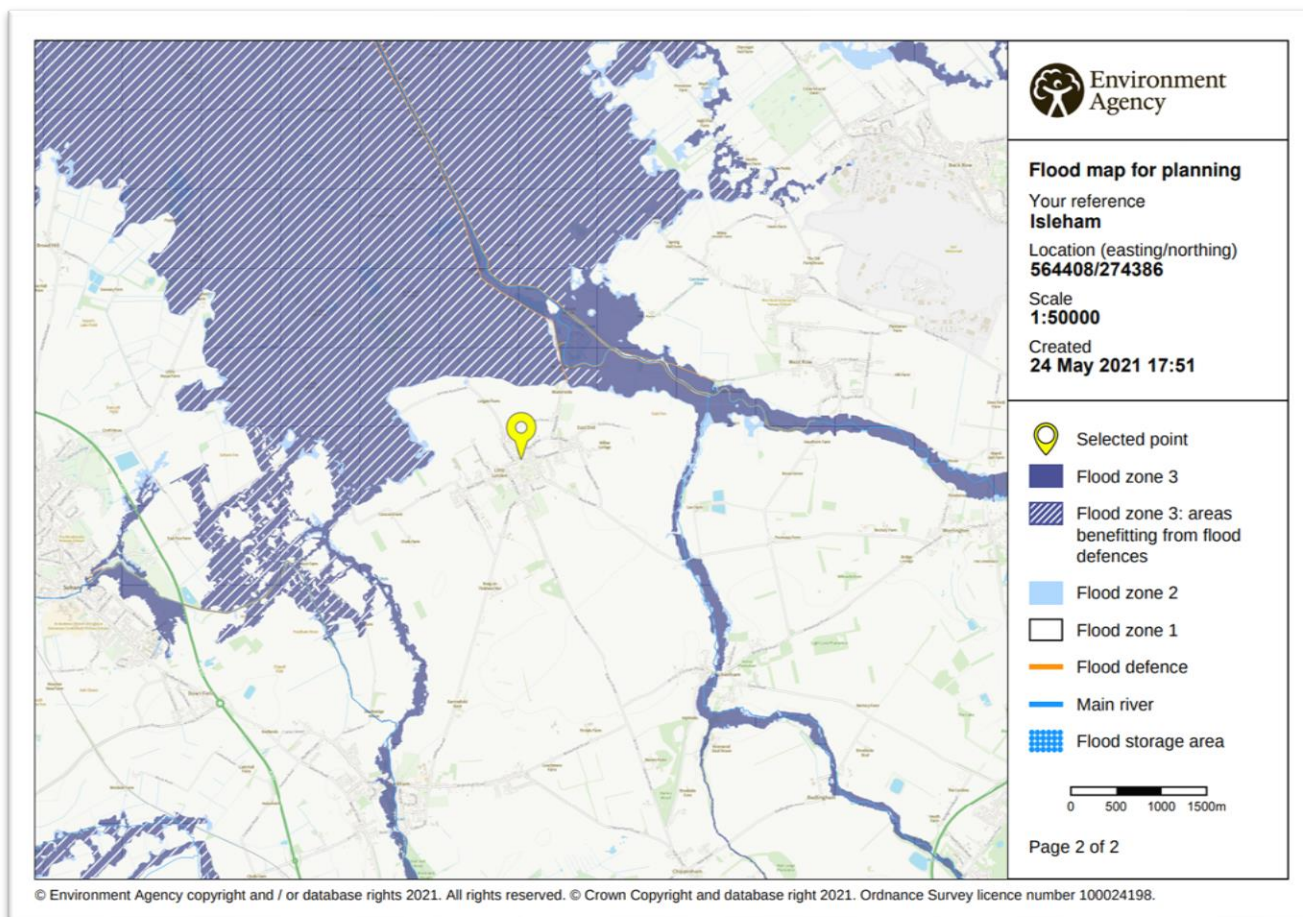
- 4.99. According to the Environment Agency's Flood Risk Map²⁸ (see **Map 8**), there are areas of fluvial flood risk (i.e. flood risk zones 2 and 3) within the INP area. These areas are largely located in the northern 'half' of the parish, reflecting the low-lying fen topography, and in proximity of the course of the River Lark and Lee Brook. Higher land principally in the southern 'half' of the parish, and within the East Anglian Chalk NCA, is predominantly in Flood Zone 1. 53.79% of the Neighbourhood Area is located in Flood Zone 3. With just 44.70% of the Neighbourhood Area in Flood Zone 1 (at least risk from fluvial flooding).

²⁶ <https://data.gov.uk/dataset/952421ec-da63-4569-817d-4d6399df40a1/provisional-agricultural-land-classification-alc>

²⁷ <https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3009>

²⁸ <https://flood-map-for-planning.service.gov.uk/>

MAP 8: FLUVIAL FLOOD RISK (ENVIRONMENT AGENCY FLOOD MAP FOR PLANNING)

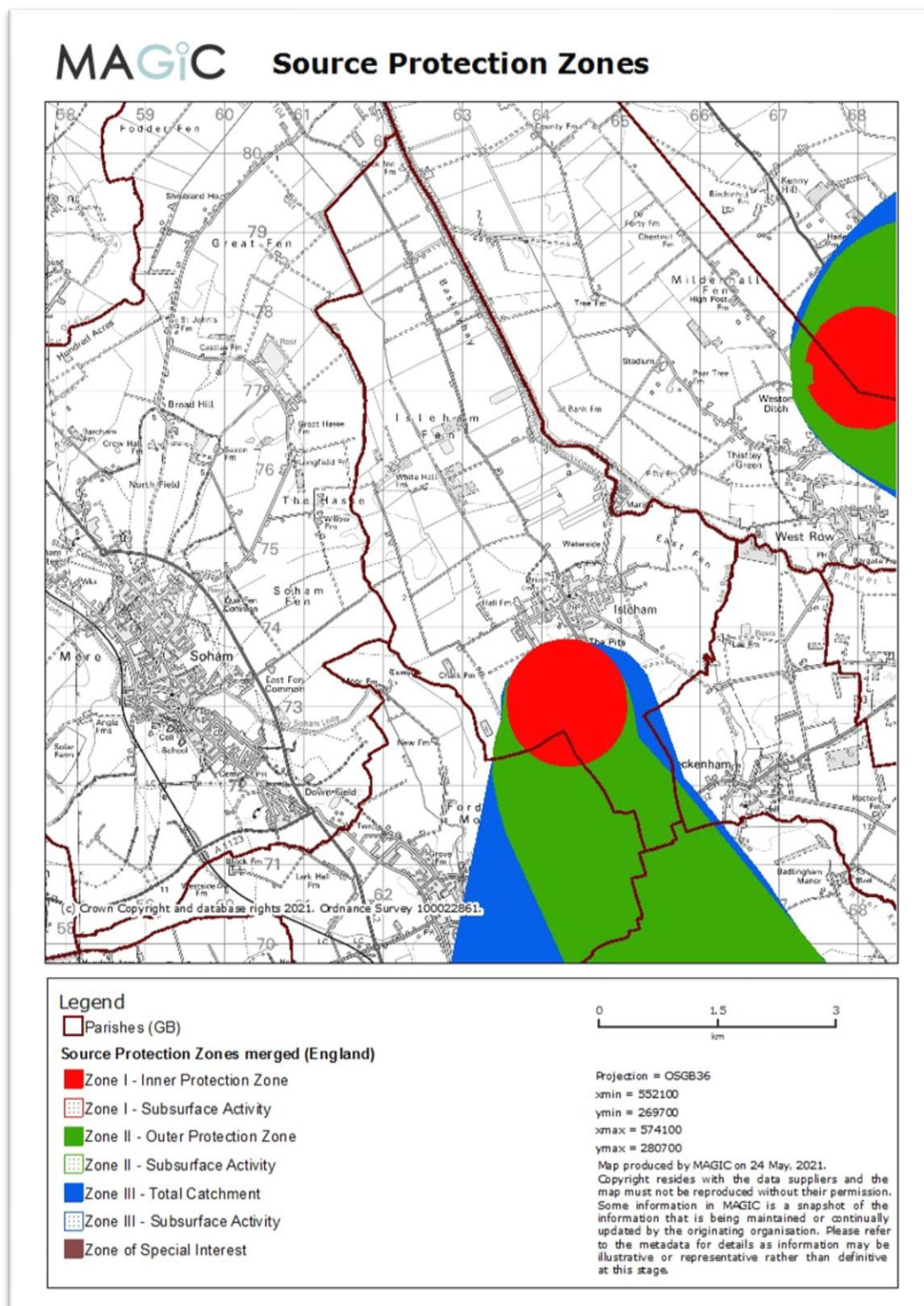


Source Protection Zones

- 4.100. Source Protection Zones areas where groundwater supplies are at risk from potentially polluting activities and accidental releases of pollutants. They are a policy tool used to control activities close to water supplies intended for human consumption. Source Protection Zones are therefore defined around large and public potable groundwater abstraction sites, including wells, boreholes and springs.
- 4.101. An area at the south of the INP area, and partially intersecting site ISL7, is classified as 'Zone I – Inner Protection Zone'. This zone is defined by a travel time of 50-days or less from any point within the zone at, or below, the water table. Additionally, the zone has as a minimum a 50-metre radius. It is based principally on biological decay criteria and is designed to protect against the transmission of toxic chemicals and water-borne disease.
- 4.102. To the south and west of 'Zone 1' are areas of 'Zone II - outer protection' and 'Zone III – Total Catchment'.
- 4.103. Zone II is defined by the 400-day travel time from a point below the water table. Additionally, this zone has a minimum radius of 250 or 500 metres, depending on the size of the abstraction. The travel time is derived from consideration of the minimum time required to provide delay, dilution and attenuation of slowly degrading pollutants.
- 4.104. Zone III is defined as the total area needed to support the abstraction or discharge from the protected groundwater source.

- 4.105. The land within the SPZs is principally in agricultural use and is separate from the built area of Isleham village. However, further investigation is required to understand the implications of proposed site allocation ISL7 in respect of the SPZ.
- 4.106. Drinking Water Safeguard Zones (Groundwater) are areas of groundwater where there is particular sensitivity to pollution risks due to the closeness of a drinking water source and groundwater flows. The INP area does not fall within a Groundwater Protection Zone.

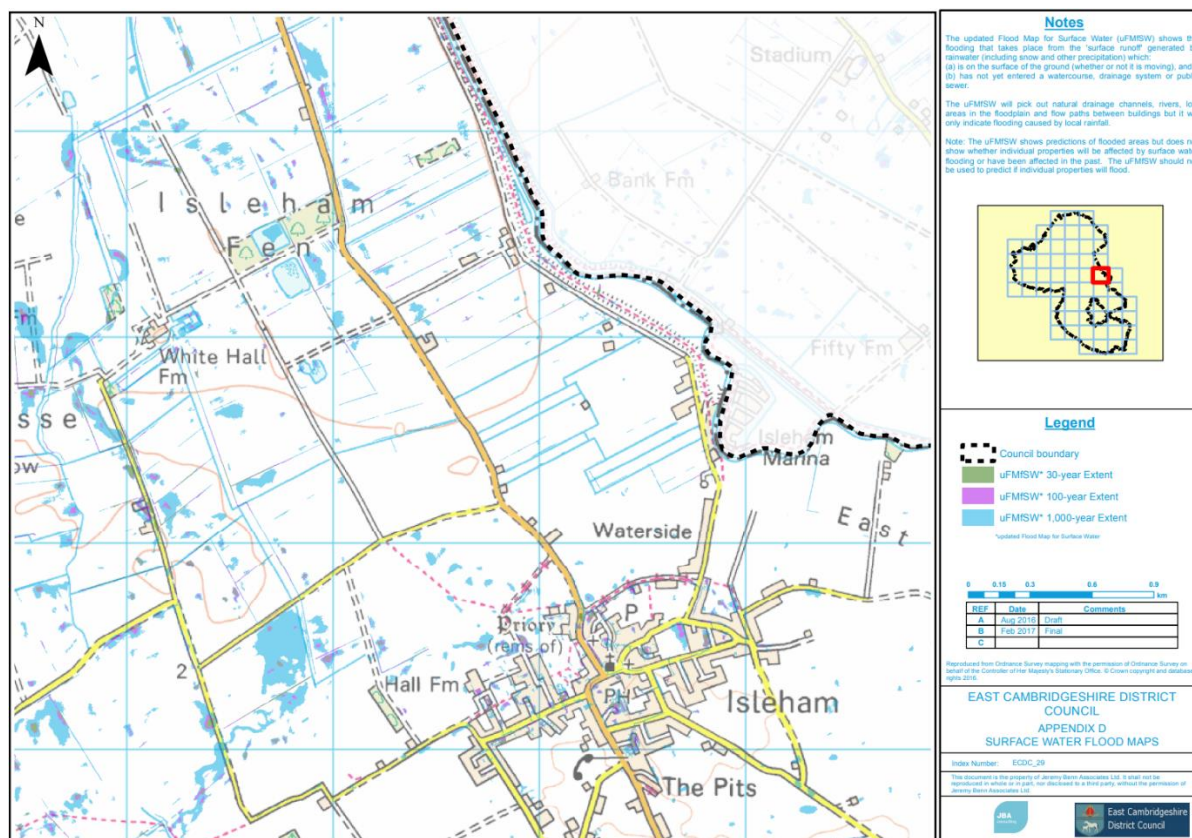
MAP 9: SOURCE PROTECTION ZONES



Surface Water Flooding

- 4.107. The Updated Flood Map for Surface Water (Map 10) indicates some small areas affected by surface water flooding, particularly in the low-lying fen areas north of Isleham village. However, surface water does not appear to be a major constraint, and proposed site allocation ISL7 appears unaffected.

MAP 10: UPDATED FLOOD MAP FOR SURFACE WATER



Summary of water environment constraints

- 4.108. Constraints relating to the water environment are particularly relevant to the assessment of 'reasonable alternatives' for potential allocations. As illustrated in Map 7, land in the north of the parish and in proximity of water courses is constrained by flood risk, with large areas of land located in Flood Zones 2 and 3. Those areas would generally be considered not suitable for residential development.
- 4.109. Land in the south of the parish falls within a Source Protection Zone and may require protection to support the abstraction or discharge from protected groundwater sources.
- 4.110. The proposed site allocation (ISL7) is located within Flood Zone 1 and is not at risk from surface water flooding. Therefore, the site is sequentially preferable in flooding terms. However, the site intersects the Source Protection Zone and at present the environmental effects on the SPZ are not known. **Consequently, likely significant effects on the water resources and the water environment cannot be 'screened out' triggering a requirement for SEA.**

Air

- 4.111. There are no Air Quality Management Areas designated within the INP area. In addition, there are no areas where air quality is monitored due to potential exceedances to air quality objectives within the Neighbourhood Area.
- 4.112. The Newmarket AQMA falls within 8km buffer of the Neighbourhood Area. Therefore, there is potential from traffic generated from new development within the Neighbourhood Area to impact upon those AQMAs. However, the overall scale of development opportunities created by the INP are relatively modest.
- 4.113. The INP includes measures to reduce emissions from motor vehicles, for example *Policy 10 – Car Parking* requires proposals to provide charging facilities for electric vehicles, thereby supporting a reduction in vehicle emissions. In addition, *Policy 9: Pedestrian Access & Public Rights of way* supports proposals which promote pedestrian access and enhance PROWs.
- 4.114. The INP supports biodiversity which play a valuable role in maintaining air quality, for example *Policy 7: Wildlife & Habitats* requires development proposals to provide measurable net gains in biodiversity. In addition, *Policy 3: Local Green Spaces* designates 13 green areas as Local Green Spaces providing protection from development.
- 4.115. Due to the relatively modest growth levels proposed by the INP, along with measures to potentially reduce vehicular emissions and improve air quality, **no likely significant effects are expected to arise in terms of air quality.**

Climatic factors

- 4.116. Climatic factors involve the consideration of a plan or programme in relation to climate change. Climate change adaptation and mitigation are closely interrelated and are closely linked to other environmental issues.
- 4.117. As discussed at 'Air', the INP includes measures to reduce vehicle emissions, improve pedestrian access and PROWs, protect important green spaces, and provide net gains in biodiversity. **Overall, no likely significant effects in respect of climatic factors are expected to arise as a result of implementing the policies in the INP.**

Material assets

- 4.118. The SEA Directive does not define what is meant by 'material assets' and it can be interpreted in a number of ways. This scoping report takes material assets to include a range of social, physical and environmental infrastructure, such as schools, health facilities, roads, railways, bus services, wastewater treatment works, flood defences, etc. Impacts on material assets are likely to relate to a number of other SEA topics.
- 4.119. Cambridgeshire County Council and Peterborough City Council are in the process of reviewing the joint Minerals and Waste Development Plan. The plan has been examined and found 'sound' subject to modifications. The plan is expected to proceed to adoption shortly.
- 4.120. The emerging Minerals and Waste Development Plan (MWDP) indicates that the southern 'half' of the Neighbourhood Area, including the whole of Isleham village, is located within a Minerals Safeguarding Area for chalk. In addition, an area along the eastern boundary of the Neighbourhood Area (adjacent to the River Lark) is designated as a Mineral Safeguarding area for gravel.
- 4.121. In Mineral Safeguarding Areas (MSA), development outside the Development Envelope or allocated sites must consult the Mineral Planning Authority (Cambs County Council), and must demonstrate the mineral can be extracted prior to development taking place; or that the mineral concerned is demonstrated to be not of current or future value; or that the development will not

prejudice future extraction of the mineral; or that there is an overriding need for the development (where prior extraction is not feasible).

- 4.122. Since all land in proximity of Isleham village is within a MSA, there are unlikely to be sequentially preferable sites to the proposed allocation. The MSA is therefore not of particular significance in identifying 'reasonable alternatives' for potential allocations. However, mineral deposits close to the built area may be of lesser value, since their extraction may be constrained by existing development.
- 4.123. Isleham Water Recycling Centre (WRC) is located north east of Isleham village. The emerging MWDP identifies Isleham Water Recycling Centre as 'essential infrastructure'. A consultation area surrounds the Water Recycling Area (WRA), and includes built development at Waterside and Fen Bank, and surrounding agricultural land. Consultation Areas (CA) provide a 'buffer' around infrastructure and minerals allocations to ensure new development does not prejudice operations of the site. The location and extent of the CA is a relevant consideration in identifying potential 'reasonable alternatives'. For the avoidance of doubt, proposed site allocation ISL7 is located outside the CA.
- 4.124. The draft INP's *Policy 8: Services and Facilities* supports the provision of new community facilities and gives protection to existing valued community facilities, including the community centre, recreation ground, bowls club, churches, pubs, food store, and allotments.
- 4.125. **Overall, the implementation of the INP is not likely to have significant effects on material assets.**

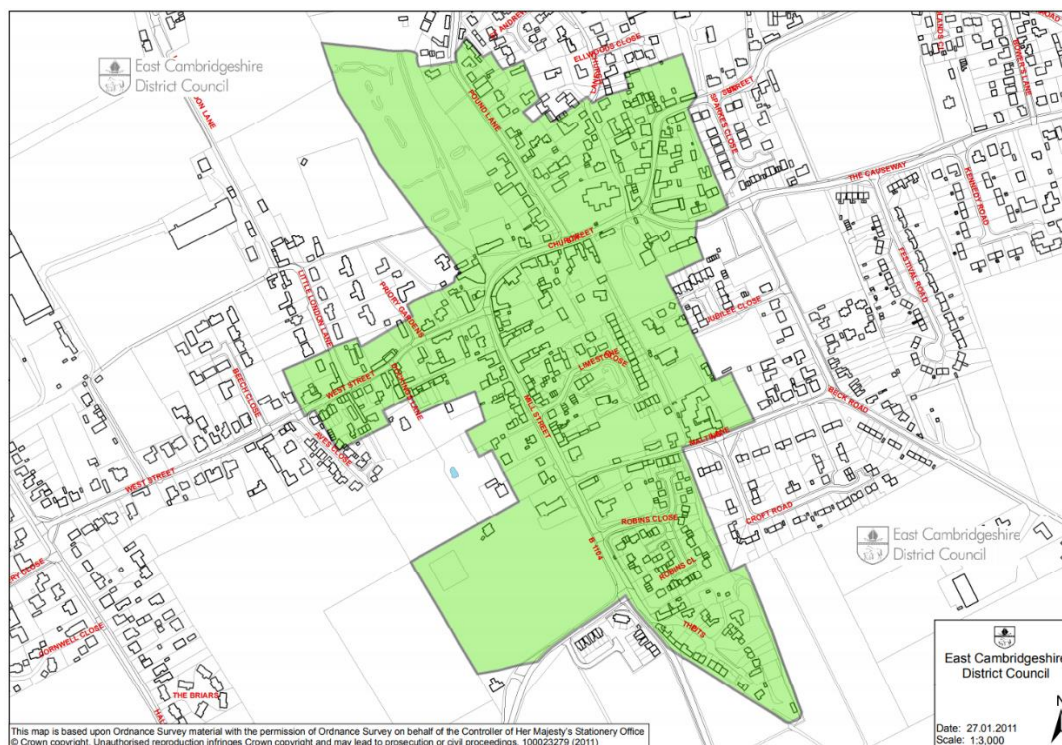
Cultural heritage, including architectural and archaeological heritage

- 4.126. The Isleham Neighbourhood Area includes a range of protected heritage assets and features, which are principally concentrated in Isleham village.

Conservation Area

- 4.127. An area at the centre of Isleham village is designated as a Conservation Area, as illustrated on **Map 11**. A Conservation Area is designated because of its special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. Its statutory protections apply to land, buildings and some natural features within the Conservation Area, and within its setting.

MAP 11: ISLEHAM CONSERVATION AREA



Listed Buildings

4.128. As indicated in Table 3, there are 34 listed buildings within the INP area²⁹. Their location is shown on **Map 12** and are concentrated in Isleham village. The listed buildings within the Isleham Neighbourhood Area are:

- Barn and Warehouse (II)
- Isleham Hall (II)
- Lady Peytons Almshouses (II)
- 79, The Causeway (II)
- 1, Mill Street (II)
- 7, Church Street (II)
- 10, Little London Lane (II)
- 2, Sun Street (II)
- War Memorial (II)
- Griffin Hotel (II)
- 41, Mill Street (II)
- 18, Little London Lane (II)
- 13, Church Street (II)
- Inisfail (II)
- The Corner House (II)
- 18, Mill Street (II)
- 24, Pound Lane (II)
- Lych Gate (II)
- The Rising Sun Public House (II)
- Church Of St andrew (I)
- 6, Sun Street (II)
- Priory Church Of St Margaret Of Antioch (I)

²⁹ <https://historicengland.org.uk/listing/>

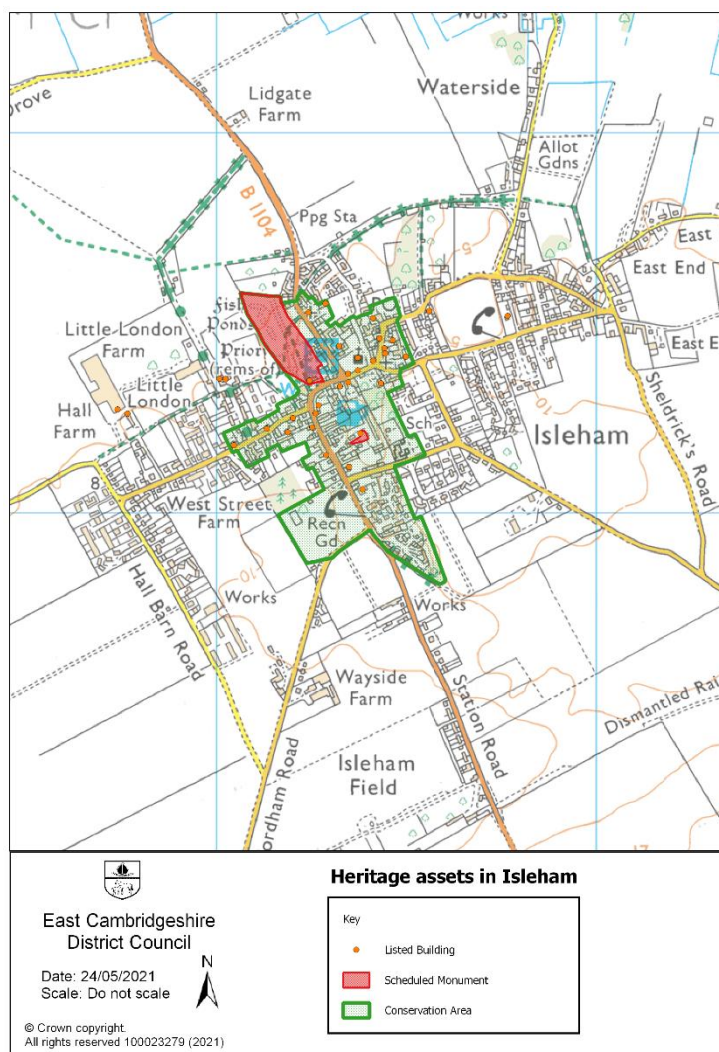
- Sunbury House (II)
- Lime Kilns (II)
- 10, Sun Street (II)
- 12, West Street (II)
- Barn, Rear Of Number 3 (Colsor) (II)
- Red Lion Public House (II)
- 5, Mill Street (II)
- 45, Mill Street (II)
- The Manor House (II)
- Baptist Chapel (II)
- 21, Sun Street (II)
- Colsor (II)

Scheduled Monuments

4.129. There are two Scheduled Monuments within the INP area, and a further two SMs within a 400m buffer:

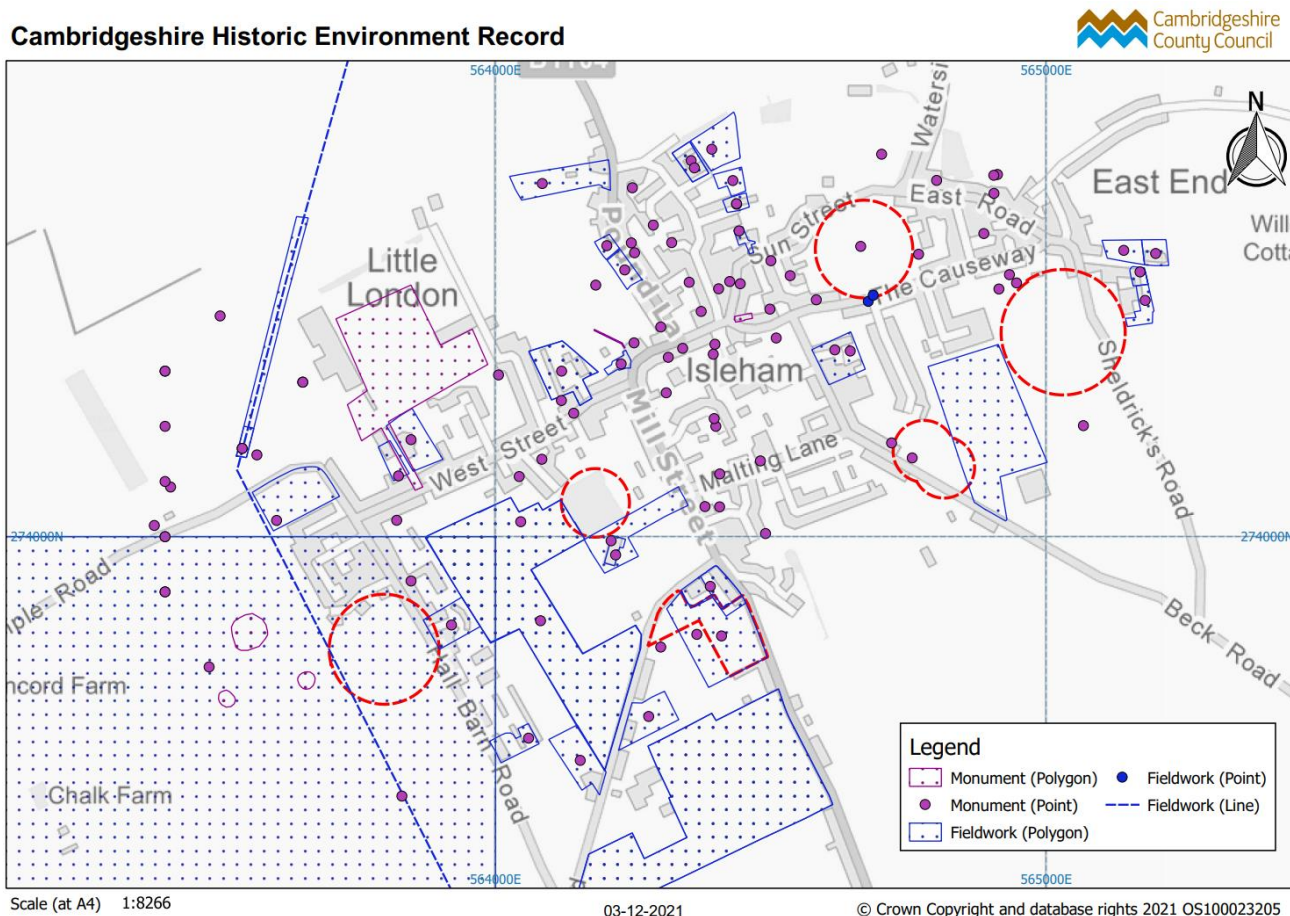
- Bowl barrow in Isleham Plantation (beyond NA boundary to south)
- Isleham priory: an alien Benedictine priory 100m west of St Andrew's Church
- Lime kilns on E side of High Street
- Moor Farm bowl barrow (beyond NA boundary to west)

MAP 12: HERITAGE ASSETS IN ISLEHAM VILLAGE



- 4.130. The *Heritage Gateway*³⁰ provides publicly available information from Cambridgeshire's Historic Environment Record on the various designated heritage assets within the INP area. However, this information does not identify specific threats to those assets.
- 4.131. To identify a baseline of non-designated heritage assets, Cambridgeshire County Council's Historic Environment Team supplied information and data relating to Historic Environment Records Monuments and details of archaeological fieldwork. The data shows more than 100 assets of archaeological importance within proximity of Isleham village. Map 13 indicates the location of HER monuments and locations where fieldwork evaluation has been undertaken in Isleham village.

MAP 13: LOCATION OF HER MONUMENTS & FIELDWORK (CCC HER)



- 4.132. Full information supplied by the Historic Environment Team is presented in Annexe I, which accompanies this Environmental Report. To determine the effects of the INP on non-designated heritage assets of archaeological importance it is necessary to seek archaeological advice from the Historic Environment Records Team. Therefore, effects on non-designated heritage assets cannot be 'screened out'.
- 4.133. The INP responds to Isleham's historic environment in a number of different ways. For example, *Policy 1a* ensures development proposals do not unacceptably impact on the historic and natural environment, including the Conservation Area and other heritage assets; *Policy 2* requires development proposals to respond to important characteristics of the surrounding area, including heritage assets; *Policy 6* identifies buildings for protection through designation as 'Locally Important Buildings'; and *Policy 5* designates Locally Important Views for protection, many of which

³⁰ <https://www.heritagegateway.org.uk/gateway/>

relate to views of the historic environment. The policy ensures that new development does not obstruct or detract from a Locally Important View.

- 4.134. A short section at the northern boundary of site allocation ISL7 adjoins the Conservation Area.
- 4.135. The northern section of ISL7 is allocated by the Local Plan 2015 as site allocation ISL1. ISL7 extends ISL1 southwards to create a larger site area with increased dwelling capacity. Once the INP is 'made', ISL7 will in effect supersede ISL1.
- 4.136. The eastern boundary of ISL7 is also in relatively close proximity to the Conservation Area boundary, but is on the opposite side of Station Road. Therefore there is potential for development of site ISL7 to affect the setting of Isleham's Conservation Area.
- 4.137. The environmental effects of Local Plan 2015's *Policy ISL 1: Housing allocation, land south and west of Lady Frances Court* was assessed through the Sustainability Appraisal³¹.
- 4.138. Sustainability Appraisal objective 3.1 seeks to *Avoid damage to areas and sites designated for their historic interest, and protect their settings*. Appraisal of Local Plan policy ISL1 identified no impact / neutral effects in respect of objective 3.1 (historical assets), with "No known direct or indirect implications."
- 4.139. However, ISL7 is materially different in scale from site ISL1, providing a three-fold increase in dwelling capacity. Therefore this scoping report advocates a cautious approach and concludes that likely significant effects on Isleham's Conservation Area cannot be ruled out.
- 4.140. **At this stage it is not possible to 'screen out' likely significant effects on the historic environment, notably on the setting and significance of Isleham's Conservation Area and non-designated heritage assets in proximity of proposed site allocation ISL7, thereby triggering a requirement for Strategic Environmental Assessment.**

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<https://www.eastcambs.gov.uk/sites/default/files/SA%20report%20of%20the%20April%202015%20Adopted%20LP%20-%20FINAL.pdf>

Landscape

4.141. The INP area lies within two National Character Areas (NCAs). The majority of the Neighbourhood Area is located in The Fens NCA. Land at the south of the Neighbourhood Area, and south of Isleham village, is located in the East Anglian Chalk NCA. The key characteristics of these NCAs include:

*The Fens NCA*³²

- Expansive, flat, open, low-lying wetland landscape influenced by the Wash estuary, and offering extensive vistas to level horizons and huge skies throughout, provides a sense of rural remoteness and tranquillity.
- Jurassic clays are overlain by rich, fertile calcareous and silty soils over the coastal and central fens and by dark, friable fen peat further inland. The soils are important for agriculture, which is hugely significant for the rural economy in the Fens. There are over 4,000 farms in the Fens; enough wheat is grown here annually to produce a quarter of a million loaves of bread and one million tons of potatoes are grown here. In addition to traditional vegetables, exotics such as pak choi are now cultivated. Some 40 per cent of England's bulbs and flowers are also produced in the Fens.
- The Wash is the largest estuarine system in Britain, supporting internationally important intertidal and coastal habitats influenced by constant processes of accretion and deposition, forming salt marsh and mudflats and providing habitats for wildfowl, wading birds and other wildlife, including grey seals and approximately 90 per cent of the UK's common seals. It also provides important natural sea defences and plays a key role in climate change regulation. Flood storage areas on the Nene, Cam, Lark and Ouse washes also provide significant biodiversity interest. True fen mainly occurs at remnant conservation sites, such as Baston or Wicken Fen.
- Overall, woodland cover is sparse, notably a few small woodland blocks, occasional avenues alongside roads, isolated field trees and shelterbelts of poplar, willow and occasionally leylandii hedges around farmsteads, and numerous orchards around Wisbech. Various alders, notably grey alder, are also used in shelterbelts and roadside avenues.
- The predominant land use is arable – wheat, root crops, bulbs, vegetables and market gardening made possible by actively draining reclaimed land areas. Associated horticultural glasshouses are a significant feature. Beef cattle graze narrow enclosures along the banks of rivers and dykes and on parts of the salt marsh and sea banks.
- Open fields, bounded by a network of drains and the distinctive hierarchy of rivers (some embanked), have a strong influence on the geometric/rectilinear landscape pattern. The structures create local enclosure and a slightly raised landform, which is mirrored in the road network that largely follows the edges of the system of large fields. The drains and ditches are also an important ecological network important for invertebrates, fish including spined loach, and macrophytes.
- The area is very rich in geodiversity and archaeology, with sediments containing evidence for past environmental and climate changes and with high potential for well-preserved waterlogged site remains at the fen edge, within some of the infilled paleo-rivers and beneath the peat.
- Large, built structures exhibit a strong vertical visual influence, such as the 83 m-high octagonal tower of 'Boston Stump' (St Botolph's Church), Ely Cathedral on the highest part of the Isle of Ely dominating its surrounding fen, wind farms and other modern large-scale industrial and agricultural buildings, while drainage and flood storage structures and embanked rail and road routes interrupt the horizontal fen plain.
- Settlements and isolated farmsteads are mostly located on the modestly elevated 'geological islands' and the low, sinuous roddon banks (infilled ancient watercourses within fens).

³² [46 The Fens 240215.pdf](#)

Elsewhere, villages tend to be dispersed ribbon settlements along the main arterial routes through the settled fens, and scattered farms remain as relics of earlier agricultural settlements. Domestic architecture mostly dates from after 1750 and comprises a mix of late Georgian-style brick houses and 20th century bungalows.

*East Anglian Chalk NCA*³³

- The underlying and solid geology is dominated by Upper Cretaceous Chalk, a narrow continuation of the chalk ridge that runs south-west–north-east across southern England, continuing in the Chilterns and along the eastern edge of The Wash. The chalk bedrock has given the NCA its nutrient-poor and shallow soils.
- Distinctive chalk rivers, the River Rhee and River Granta, flow in gentle river valleys in a diagonally north-west direction across the NCA.
- The chalk aquifer is abstracted for water to supply Cambridge and its surroundings and also supports flows of springs and chalk streams; features associated with a history of modification include watercress beds, culverts and habitat enhancements.
- The rolling downland, mostly in arable production, has sparse tree cover but distinctive beech belts along long, straight roads. Certain high points have small beech copses or ‘hanger’, which are prominent and characteristic features in the open landscape. In the east there are pine belts.
- Remnant chalk grassland, including road verges, supports chalkland flora and vestigial populations of invertebrates, such as great pignut and the chalkhill blue butterfly.
- Archaeological features include Neolithic long barrows and bronze-age tumuli lining the route of the prehistoric Icknield Way; iron-age hill forts, including that at Wandlebury; impressive Roman burial monuments and cemeteries such as the Bartlow Hills; a distinctive communication network linking the rural Roman landscape to settlements and small towns, such as Great Chesterford; the four parallel Cambridgeshire dykes that cross the Chalk: the Anglo-Saxon linear earthworks of Devil’s Dyke, Fleam Dyke, Heydon/Bran Ditch and Brent Ditch; ridge-and-furrow cultivation remains of the open field systems of the earlier medieval period; and large numbers of later moated enclosures, park lands created, sheepwalks, arterial routes and nucleated villages that emphasise the land use change of this period.
- Brick and ‘clunch’ (building chalk) under thatched roofs were the traditional building materials, with some earlier survival of timber frame. Isolated farmhouses built of grey or yellowish brick have a bleached appearance.
- Settlement is focused in small towns and in villages. There are a number of expanding commuter villages located generally within valleys. Letchworth Garden City is a nationally significant designed garden city.
- In and around the wider area of Newmarket, stud farms impose a distinctive geometric, enclosed and manicured pattern to the landscape.
- The NCA is traversed by the Icknield Way, an ancient route that is now a public right of way. Roads and lanes strike across the downs perpendicularly and follow historical tracks that originally brought livestock to their summer grazing. Today major roads and railways are prominent landscape characteristics of the NCA.

³³ [NCA Profile: 87 East Anglian Chalk - NE529 \(naturalengland.org.uk\)](https://naturalengland.org.uk/nca-profile/87-east-anglian-chalk-ne529)

- 4.142. Conservation of the parish's landscapes is an important theme of the INP, as indicated in objective 5:

"that the natural landscape including footpaths, green spaces and valued views will be protected and where wildlife and habitats are able to flourish"

- 4.143. Also related to the theme of 'landscape', objective 2 seeks to retain Isleham's identity as a distinct and independent settlement:

"Isleham will maintain its visual and physical separation from Fordham and that its place in the locality will grow positively in terms of both its independence and its interdependence of other local towns and villages"

- 4.144. Policy 1a updates Isleham's Development Envelope. Land outside the Development Envelope is defined as open countryside with limited opportunities for development. The Development Envelope is an important tool in conserving the open countryside landscape and protecting the character of Isleham village.

- 4.145. Policy 1b limits building heights to protect the character of the built form of the village, resisting proposals for flats or apartments of three storeys or more, and Policy 2 sets out a range of design principles to ensure that development proposals deliver high quality design, conserving views and important landscape features.

- 4.146. The absence of any formal landscape designations which might constrain development of site allocation ISL7, along with the INP's policy measures to provide high quality design means it is reasonable to assume that development of site allocation ISL7 will not have adverse impacts on the landscape.

- 4.147. Overall, the INP prioritises conserving the area's landscapes. **Overall, the INP is not likely to lead to significant environmental effects on the landscape.**

Potential site allocation and 'reasonable alternatives'

- 4.148. A Neighbourhood Plan may typically be more likely to have significant environmental effects if it allocates sites for development (for housing, employment, etc.). The assessment of 'reasonable alternatives' is a requirement of the SEA Regulations.
- 4.149. A key focus of the assessment of 'reasonable alternatives' is the consideration of different development strategies for the Neighbourhood Plan. This means exploring the sustainability implications of alternative approaches to delivering new development in the neighbourhood area, including in terms of scale and location. This will help support neighbourhood planners in determining which locations would potentially be appropriate for taking forward as allocations through the Neighbourhood Plan. In light of this, this assessment does not only focus on the sites likely to be allocated through the Neighbourhood Plan, but also considers the wider range of locations that could be considered for potential allocation in the plan.

Proposed allocation

- 4.150. The INP identifies a site allocation for the development of up to 45 dwellings, referred to as site *ISL7 – Land off Fordham Road*. Site ISL7 extends the site area of Local Plan site allocation ISL1, thereby providing a net gain of approximately +30 dwellings. The INP has a clear expectation that the site will principally deliver affordable housing that meets parish needs.
- 4.151. As previously discussed the INP updates the Development Envelope, and sets its own policy to manage development inside/outside the envelope, its approach is broadly aligned with that of the Local Plan 2015. Therefore the key, distinguishing characteristic of the INP's growth strategy and focus of this assessment is the allocation of site ISL7.
- 4.152. The assessment of the INP against the various SEA themes was unable to rule out likely significant effects as a result of the development of the proposed site allocation, triggering a requirement for a full *Strategic Environmental Assessment*. Specifically, potential significant effects could not be ruled out for the following matters:
- In the absence of available data regarding the sensitivities of County Wildlife Sites, significant effects cannot currently be ruled out;
 - The proposed site allocation intersects a Source Protection Zone, and therefore has the potential to impact upon groundwater resources; and
 - The proposed site allocation adjoins Isleham's Conservation Area. The effects of development on the setting of the Conservation Area are not known at this stage.

Existing Local Plan site allocations

- 4.153. As discussed in Section 3, the East Cambridgeshire Local Plan 2015 was subject to Sustainability Appraisal (incorporating SEA), and documented in a Sustainability Appraisal Report³⁴ which fully considered the environmental, social and economic impacts of each of the policies and site allocations within the Local Plan.
- 4.154. The Local Plan's growth strategy concentrates growth in the market towns, with lesser growth in the rural area. The SA Report considered a range of options for distributing growth and concluded a market-led approach was the most sustainable option:
- 4.155. *The policy should help to deliver a range of social, environmental and economic benefits. In particular, it will help to reduce the need to travel, promote accessibility to services and facilities, protect the countryside, and help to support the rural economy. The approach*

³⁴ <https://www.eastcambs.gov.uk/local-development-framework/east-cambridgeshire-local-plan-2015>

represents a continuation of the current policy approach, so no significant temporal differences are identified.

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- 4.156. Based on this growth strategy, the Local Plan 2015 includes five site allocations for housing development, and one site allocation for employment development. As stated by the government's planning practice guidance, *Neighbourhood plans should not re-allocate sites that are already allocated through these strategic plans*³⁵. **Existing Local Plan 2015 site allocations cannot, therefore, be considered 'reasonable alternatives'.**
- 4.157. Similarly, following a legal challenge in relation to the Witchford Neighbourhood Plan, sites which have planning permission at the time of preparing a Neighbourhood Plan can no longer be allocated, and instead should be referred to as 'committed sites'. **Therefore sites with planning permission are not 'reasonable alternatives'.**
- 4.158. In addition, the Local Plan 2015 sets a Development Envelope around Isleham village within which development is, in principle, acceptable. The SA Report concluded:
- In principle, development envelopes are sustainable if they help to concentrate development in the most sustainable locations, creating critical mass of services, jobs and homes...*

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- 4.159. Consequently, allocation of small-scale infill and windfall sites is not necessary as such sites are addressed by the Development Envelope policy. **Small scale, infill development sites are not considered 'reasonable alternatives'.**

HRA 2018 sites

- 4.160. As discussed in section 3, in February 2018, ECDC submitted for examination a new Local Plan along with a supporting evidence base. Examination of the Local Plan commenced in June 2018. However, in February 2019, East Cambridgeshire District Council withdrew the draft Local Plan. At the point of withdrawal, the draft Local Plan was at an advanced stage of its preparation and had been subject to a full Sustainability Appraisal incorporating SEA and a full HRA.
- 4.161. Following withdrawal of the Local Plan, East Cambridgeshire District Council has retained the HRA (dated June 2018). The HRA 2018 assessed the potential impacts of a number of sites within the Isleham Neighbourhood Area. The HRA 2018 does not provide those sites with any planning status. However, the HRA provides assessment of the following sites in terms of their potential impacts on European Sites:
- ISL.H1 Land south and west of Lady Frances Court
 - ISL.H2 Land at 5a Fordham Road
 - ISL.H3 Land west of Hall Barn Road
 - ISL.H4 Land off Fordham Road
 - ISL.E1 Land adjacent to Hall Barn Road Industrial Estate
- 4.162. The boundary of site ISL.H1 is coterminous with the INP's proposed site allocation ISL7 and is therefore the INP's **preferred option** for allocation.
- 4.163. Site ISL.H2 is allocated in the Local Plan 2015 as site ISL2, and is therefore **not a reasonable alternative**.

³⁵ Paragraph: 044 Reference ID: 41-044-20190509, Planning Practice Guidance

- 4.164. Site ISL.H3 is allocated in the Local Plan 2015 as site ISL3, and is therefore **not a reasonable alternative**. In addition, planning application 20/00260/OUM is pending consideration.
- 4.165. Site ISL.H4 currently benefits from planning permission ('Land Accessed Between 2 And 4 Fordham Road Isleham' (19/00447/RMM)) for the construction of 121 dwellings, and is therefore **not a reasonable alternative**.
- 4.166. Site ISL.E1 is allocated in the Local Plan 2015 as site ISL6, and is therefore **not a reasonable alternative**.
- 4.167. Therefore, the sites in Isleham assessed through the HRA 2018 do not constitute reasonable alternatives.

Other known sites

- 4.168. Information on available sites is somewhat limited. ECDC carried out a Call for Sites exercise in 2016. However, this information on available sites was withdrawn in 2019 along with the submitted Local Plan. At present, there is no up to date 'SHELAA' or similar document providing details on the availability and suitability of sites.
- 4.169. A search of ECDC's planning records reveals recent planning proposals for major residential development in Isleham.

Planning application ref, street address and proposal	Status
<p>19/00376/OUM – <i>Land Off Station Road, Isleham</i></p> <p>Outline planning application for the erection of up to 110 dwellings with public open space, landscaping, sustainable drainage system (SuDS) and vehicular access points from Station Road and Fordham Road. All matters reserved except for means of main vehicular access.</p>	<p>Application refused 22 April 2020</p> <p>Summary of reasons for refusal (from Decision Notice):</p> <ul style="list-style-type: none"> Site is a key entrance/landscape feature entering the village - development in this location, which comprises a predominately open and rural setting, would not be in keeping and would create an urbanising impact, eroding the predominately rural character of this edge of village location, causing detrimental harm to the wider landscape and fails to complement the character of the existing village. The proposal, when considered cumulatively with recent approvals would result in an unsustainable amount of residential development, which would outstrip the modest increase in employment and services in Isleham and place significantly increased pressure on local infrastructure. The existing village infrastructure, including the Primary/Early Years school, is running beyond capacity. <p>Not a reasonable alternative due to potential for harm to landscape and impact on local services and infrastructure, as a result of scale of development.</p>
<p>20/00007/OUM - <i>Land North East Of 100 Beck Road, Isleham</i></p> <p>Residential development for up to 70 dwellings (Class C3) with associated access, infrastructure and public open space</p>	<p>Application refused 07 May 2020</p> <p>Summary of reasons for refusal (from Decision Notice):</p> <ul style="list-style-type: none"> The proposal, when considered cumulatively with recent approvals would result in an unsustainable amount of residential development, which would outstrip the modest increase in employment and services in Isleham and place

	<p>significantly increased pressure on local infrastructure. The existing village infrastructure, including the Primary/Early Years school, is running beyond capacity.</p> <p>Not a reasonable alternative due to potential for harm to local services and infrastructure, as a result of scale of development.</p>
<p>20/00491/OUM - <i>Land South Of 46 East Fen Road, Isleham</i></p> <p>Construct 23 no. new dwellings (Inc. 7no. affordable) and the variation of an existing dwelling</p>	<p>Application refused 08 April 2020</p> <p>Summary of reasons for refusal (from Decision Notice):</p> <ul style="list-style-type: none"> • The proposal, when considered cumulatively with recent approvals would result in an unsustainable amount of residential development, which would outstrip the modest increase in employment and services in Isleham and place significantly increased pressure on local infrastructure. The existing village infrastructure, including the Primary/Early years school, is running beyond capacity. Until such time as the infrastructure is improved, including the provision of a new site for the expanded Primary/Early Years school, the village is unable to cope with additional speculative development. • Within this edge of settlement location, development would create an intrusive urbanising impact upon the surrounding rural landscape, eroding the predominately rural character of the countryside setting, causing detrimental harm to the character and amenities of the area. The dwellings would interrupt views over open countryside and would contribute to the erosion of the rural character of this part of Isleham. • Due to the location of the site within open countryside on the settlement edge of Isleham, where there is limited capacity for road widening, poor visibility and inadequate provision of footpaths to serve the site, the increase in activity of vehicles accessing the proposal would result in a detrimental impact on highway and pedestrian safety. <p>Not a reasonable alternative due to potential for harm to landscape, impact on local services and infrastructure due to scale of development, and safety.</p>
<p>20/01517/RMM - <i>Land West Of 4 Coates Drove, Isleham</i></p> <p>Reserved matters of previously approved 18/01736/OUM for Residential development of 10 dwellings as 3no. 4 bed detached with single garage for private sale, 3no. 3 bed detached with single garage for private sale, 2no. 3 bed and 2no. 2 bed semi-detached with on-site parking affordable housing.</p>	<p>Application permitted 11 March 2021</p> <p>Not a reasonable alternative as site has planning permission.</p>

- 4.170. Scale of the proposal was a common reason for refusal for applications 19/00376/OUM (70 dwellings), 20/00007/OUM (110 dwellings), 20/00491/OUM (23 dwellings). Therefore, the scale of proposals and their potential impacts on local infrastructure (i.e. “material assets”) is an important consideration in assessing ‘reasonable alternatives’.

Local Green Spaces

- 4.171. The INP proposes designation of 13 *Local Green Spaces*. The purpose of Local Green Space designation is to protect green areas of value to the local community from development. The INP’s proposed Local Green Spaces have been identified following an objective assessment against national policy criteria. Consequently, **sites proposed for designation as Local Green Spaces cannot form reasonable alternatives**, as to allocate such sites would be counter to the community’s aspirations to protect such sites.

Area of Separation

- 4.172. The INP’s draft policy 4 seeks to maintain separation between Isleham and neighbouring settlements, to preserve Isleham’s distinct identity. The policy identifies an ‘are of separation’ south of Isleham village. Within the area of separation, development proposals which would either visually or physically reduce the separation, or sense of separation, will not be supported.
- 4.173. Land within the Area of Separation cannot be considered a ‘reasonable alternative’, as this would conflict with the plan’s aspirations to preserve openness in this location.

Environmental Constraints

- 4.174. As identified in Table 3
- 4.175. , and discussed at length in section 4, there are a number of environmental constraints which directly affect the Isleham Neighbourhood Area. Notably, flood risk, source protection zones, heritage assets, a Water Recycling Centre, and County Wildlife Sites.
- 4.176. Development of constrained land raises the likelihood of likely significant environmental effects in respect of the SEA’s environmental themes. Therefore, constrained land is likely not suitable, or of lesser suitability, for development.

Areas of search

- 4.177. In identifying potential ‘reasonable alternative’ sites, land which is not likely to be suitable for allocation has been omitted from the search area. This constrained land is shaded grey on Map 14 and includes:
- Sites already allocated in the Local Plan, or with planning permission, or where there has been a recent refusal for major development;
 - Land within the Updated Development Envelope as both the draft INP and Local Plan support the principle of development within the Development Envelope;
 - Land where development would conflict with the aspirations of the INP, such as proposed *Local Green Space* designations and *Areas of Separation*; and
 - Land subject to environmental constraints, such as Flood Zones 2 and 3, land at risk from surface water flooding (1 in 1000 year event), Source Protection Zones, Scheduled Monuments, Conservation Are, Water Recycling Centre and Consultation Area, and County Wildlife Sites.
- 4.178. Based on the matters considered in this SEA Scoping Report only, the remaining white land can be considered to be generally free from constraints.

- 4.179. However, in practice the situation is more complex. Isolated development, physically separate from Isleham village would conflict with the Local Plan and draft INP's growth strategies which limit development in the open countryside. Therefore the area of search for 'reasonable alternatives' must be limited to land which is well-related to Isleham village.
- 4.180. As illustrated on Map 14, five 'areas of search' for potential 'reasonable alternative' sites are identified. From a desk-based assessment taking into account the matters discussed, these areas appear generally free from constraints and well-related to the built area of Isleham village.
- 4.181. No areas of search have been identified at the northern fringe of Isleham village. The built form appears more organic along the northern fringe as the village transitions to the open countryside, increasing the likelihood of harm to landscape character. Areas at risk of surface water flooding are more prevalent, and the presence of other constraints, such as Scheduled Monuments and proposed Local Green Spaces, have resulted in no 'areas of search' being identified along Isleham village's northern edge.
- 4.182. There remains uncertainty regarding the scale of development which Isleham can accommodate without harm to its community infrastructure and local services.
- 4.183. For the avoidance of doubt, the availability of land within the five areas of search is not known. The areas have been identified from a desk-based assessment and have not been promoted by or on behalf of a landowner or potential applicant. In addition, the areas of search have not been subject to a HRA. Therefore, if any site within an area of search is pursued through the Neighbourhood Plan, a HRA may be required.
- 4.184. For the purposes of the SEA's *Environmental Report*, it is proposed that sites within the five 'areas of search' be assessed alongside proposed site allocation ISL7 as 'reasonable alternatives'.



SEA & HRA Screening Assessment

- 4.185. The preceding paragraphs in this section assess the INP's policies against the SEA Directive's environmental themes, taking into account a range of environmental constraints within, or in proximity of the Neighbourhood Area, as summarised in Table 3.
- 4.186. The potential for likely significant effects to arise was identified in respect of the development of proposed site allocation ISL7, namely:
- Potential effects on County Wildlife Sites within, or in proximity of, the Neighbourhood Area;
 - The proposed site allocation intersects a Source Protection Zone, and therefore has the potential to impact upon groundwater resources; and
 - The proposed site allocation adjoins Isleham's Conservation Area and there are a number of non-designated heritage assets in proximity of the site. The effects of development on the setting of the Conservation Area and other heritage assets are not known at this stage.
- 4.187. No other likely significant effects on the environment are identified. Crucially, significant effects on European sites are not likely to arise from implementation of the INP. This was confirmed by ECDC through its HRA 2018, which included assessment of proposed site allocation (ISL7)³⁶.
- 4.188. **Figure 3** provides assessment of the INP against the SEA Directive criteria to identify likely *significant* effects on the environment.
- 4.189. **Figure 4** applies the SEA Directive criteria to the INP as per the flow chart in **Figure 2**, to determine whether the *principle* of the INP would warrant the need for SEA.

FIGURE 3: ASSESSMENT OF THE LIKELY SIGNIFICANT EFFECTS ON THE ENVIRONMENT

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	Assessment	Likely <i>significant</i> environmental effect
The characteristics of plans and programmes, having regard, in particular, to –		
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	<p>The INP has been prepared for town and country planning purposes and would, if adopted, form part of the statutory Development Plan and contribute to the framework for future development projects.</p> <p>The principle of development in the Neighbourhood Area, including the nature of development, location and scale, has already been determined by the East Cambridgeshire Local Plan 2015's growth strategy.</p> <p>The INP provides a framework for additional development opportunities beyond those identified by the</p>	Yes

³⁶ Referred to as site ISL.H1 in the HRA 2018

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	Assessment	Likely <i>significant</i> environmental effect
	<p>Local Plan. Notably through the allocation of a development site for 45 dwellings (providing a net gain of 30 dwellings beyond the Local Plan 2015). The potential for significant effects arising from the proposals have therefore not been tested through SA of the Local Plan. However, the effects of the proposed site allocation were assessed through the updated HRA 2018.</p> <p>Once made, the INP would only apply to a relatively small geographical area (the Isleham Neighbourhood Area) where a limited number of proposals are anticipated over the plan period. With the exception of the proposed site allocation, most other proposals are expected to be of a small scale.</p>	
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	<p>The INP must be in general conformity with the strategic policies of the East Cambridgeshire Local Plan and national planning policy as set out in the NPPF.</p> <p>The INP provides policies for the Plan area, relevant to the parish area only. The INP would therefore not strongly influence other plans and programmes higher up the spatial planning hierarchy.</p>	No
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	<p>It is a basic condition that a NDP must contribute to the achievement of sustainable development. The INP seeks to ensure that environmental considerations are taken into account. It includes the following policies which promote environmental considerations with a view to promoting sustainable development:</p> <ul style="list-style-type: none"> - Policy 1a: Housing Growth - Policy 2: Character & Design - Policy 3: Local Green Spaces - Policy 4: Maintaining Separation - Policy 5: Locally Important Views - Policy 6: Heritage Assets & Locally Important Buildings & Structures - Policy 7: Wildlife & Habitats - Policy 9: Pedestrian Access & Public Rights of Way - Policy 10: Car Parking - Policy 11: Cycle Parking & Storage 	No

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	Assessment	Likely <i>significant</i> environmental effect
	<p>Other policies in the plan seek to address social and economic matters, such as ensuring that new development helps meet housing needs, community facilities and infrastructure, etc.</p> <p>These policies are compatible with the adopted East Cambridgeshire Local Plan, which was subject to both SA/SEA and HRA throughout the plan making process.</p>	
(d) environmental problems relevant to the plan or programme; and	There are no specific environmental problems relevant to the INP that have not been identified and assessed through the higher-level Local Plan and its accompanying SA/SEA.	No
(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	The content of the INP is not in conflict with any plans or programmes within the wider area for the implementation of Community legislation on the environment.	No
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to —		
(a) the probability, duration, frequency and reversibility of the effects;	<p>The INP allocates a site for development which would enable additional growth beyond that identified by the Local Plan.</p> <p>Assessment of the INP identified the potential for likely significant effects on County Wildlife Sites, Source Protection Zones and Isleham's Conservation Area.</p> <p>The INP supports infill development within the Development Envelope and more limited forms of development in the countryside. However, this is a continuation of the Local Plan's strategy. Opportunities for windfall sites are expected to be generally limited and typically small scale, infill development, therefore the effects are not likely to be significant and are expected to be minimal.</p> <p>It is likely that some policies may positively contribute to conserving and enhancing environmental features within</p>	<p>Yes</p> <p>(likely significant effects cannot be ruled out)</p>

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	Assessment	Likely <i>significant</i> environmental effect
	the Neighbourhood Area. However, effects are not expected to be significant. See also paras. 4.10 to 4.145 .	
(b) the cumulative nature of the effects;	As above in 2(a)	Yes (likely significant effects cannot be ruled out)
(c) the transboundary nature of the effects;	The INP is not expected to give rise to any transboundary effects.	No
(d) the risks to human health or the environment (for example, due to accidents);	The INP is not anticipated to give rise to any significant environmental effects that would pose risk to human health or the environment: the effects of the policies in the INP may enhance these elements.	No
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The Isleham Neighbourhood Area is coterminous with the boundary of Isleham parish. Isleham parish has a relatively small population, estimated by ONS to be 2,441 people at mid-2018. The spatial extent of any effects of the implementation of the INP are expected to be limited to the immediate local area (i.e. the Neighbourhood Area), although the potential for likely significant effects on County Wildlife Sites located outside the Neighbourhood area cannot be ruled out at this stage. The magnitude and spatial extent of the effects are expected to be limited in both the local and wider district context.	No
(f) the value and vulnerability of the area likely to be affected due to— (i) special natural characteristics or cultural heritage;	As considered in paras. 4.10 to 4.145 there is <i>potential</i> for likely significant effects on County Wildlife Sites, Source Protection Zones, and Isleham's Conservation Area. As discussed in paras. 4.10 to 4.145 , significant effects on internationally designated habitat sites (European sites) are not likely to arise.	Yes

SEA Directive criteria and Schedule 1 of Environmental Assessment of plans and programmes Regulations 2004	Assessment	Likely <i>significant</i> environmental effect
(ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use; and	The INP is not expected to exceed environmental quality standards or lead to intensive land use.	
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	<p>As identified in Table 3, the Isleham Neighbourhood Area includes a number of areas and assets benefitting from protection through statute or local policies, including a Conservation Area, Listed Buildings, Scheduled Monuments, and County Wildlife Sites, etc. The potential for likely significant effects on the Conservation Area, County Wildlife Sites (and Source Protection Zones) cannot be ruled out at this stage.</p> <p>Effects of the INP on landscapes are expected to be positive and localised, as the INP includes policies to restrict development in the countryside, and ensure new development is of high quality design. However, the effects are not likely to be significant in the context of SEA.</p> <p>Significant effects on internationally designated habitat sites (European sites) are not likely to arise.</p>	Yes

FIGURE 4: APPLICATION OF THE SEA DIRECTIVE TO ISLEHAM NEIGHBOURHOOD PLAN

Criteria	Response: Yes/ No/ Not applicable	Details
1. Is the NDP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art 2 (a))	Yes	<p>The preparation and adoption of the INP is allowed under the Town and Country Planning Act 1990, as amended by the Localism Act 2011. Whilst the INP has been prepared by Isleham Parish Council, it will be adopted by ECDC as the local authority and will form part of the statutory development plan for the East Cambridgeshire area.</p> <p>GO TO STAGE 2</p>
2. Is the NDP required by legislative, regulatory or administrative provisions? (Art 2 (a))	Yes	<p>Whilst the production of a NDP is not a requirement and is optional, it will, if made, form part of the statutory development plan for the East Cambridgeshire area. It is therefore important that this screening process considers the potential effects.</p> <p>GO TO STAGE 3</p>
3. Is the NDP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2 (a))	<p>Yes – Town & Country Planning / land use;</p> <p>No - EIA Directive Annex I & II</p>	<p>The INP is being prepared for town and country planning and land use purposes, setting a framework for future development consents within the Isleham Neighbourhood Area.</p> <p>However, the NDP does not set a framework for consent of projects in Annexes I and II to the EIA Directive.</p> <p>GO TO STAGE 4</p>
4. Will the NDP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art 3.2 (b))	No	<p>See paras. 4.10 to 4.145 and Figure 3 for assessment of the NP in terms of HRA.</p> <p>Significant effects on internationally designated habitat sites (European sites) are not likely to arise, and therefore no assessment under Article 6 or 7 is required.</p> <p>GO TO STAGE 6</p>

Criteria	Response: Yes/ No/ Not applicable	Details
5. Does the NDP determine the use of small areas at local level, OR is it a minor modification of an NDP subject to Art. 3.2? (Art 3.3)	n/a	
6. Does the NDP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Yes	Once 'made' the INP forms part of the Development Plan and will be used in the decision-making process on planning applications. It therefore sets the framework for future developments at a local level. GO TO STAGE 8
7. Is the NDP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7?	n/a	The INP does not deal with these issues.
8. Is it likely to have a significant effect on the environment?	Yes	A NDP could potentially have a significant effect on the environment, dependent on the proposed policies within the NDP. At paras. 4.10 to 4.145 and Figure 3 , it is concluded that implementation of the INP has the potential to give rise to likely significant effects on the environment, specifically potential effects on - <ul style="list-style-type: none"> - County Wildlife Sites within, or in proximity of, the Neighbourhood Area; - Groundwater resources, from pollution or contamination through proposed development within a Source Protection Zone; - Non-designated heritage assets and Isleham's Conservation Area, through proposed development within the CA's setting.
Outcome: SEA REQUIRED ('Screened in') AND HRA NOT REQUIRED ('Screened out')		

Summary of screening outcome

- 4.190. Having reviewed the environmental characteristics of the INP area and the vision, objectives and policies against the SEA criteria, ECDC is unable to rule out likely significant effects on the environment as a result of implementation of the INP. Specifically, this includes the potential for likely significant effects on:
- County Wildlife Sites within, or in proximity of, the Neighbourhood Area;
 - Groundwater resources from pollution or contamination through proposed development within a Source Protection Zone;
 - Non-designated heritage assets and Isleham's Conservation Area through proposed development within the CA's setting.
- 4.191. Therefore, the INP must be **screened in** for further SEA.
- 4.192. The assessment of the INP found that significant effects on designated European sites are not likely. Therefore, further HRA assessment under the Habitats Regulations can be **screened out**.
- 4.193. A number of the INP's objectives and policies are particularly environmentally conscientious and address environmental issues positively by seeking to improve the quality of new development to reduce its impacts on the environment. The assessment concluded that such policies and objectives, whilst positive in their effects are not likely to constitute 'significant effects' for the purposes of SEA.
- 4.194. In the event that the vision, objectives and/or policies covered by the INP should change significantly during the plan-making process, this screening process may need to be revisited.

5. Addressing potential adverse effects on the environment

- 5.1. This section seeks to identify measures to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the INP.
- 5.2. Section 4 identified the potential for likely significant effects to arise from implementation of the INP. More specifically, the potential for likely significant effects to arise was identified in respect of additional new major residential development at *proposed site allocation ISL7*, namely:
- Potential effects on County Wildlife Sites within, or in proximity of, the Neighbourhood Area;
 - The proposed site allocation intersects a Source Protection Zone, and therefore has the potential to impact upon groundwater resources; and
 - The proposed site allocation adjoins Isleham's Conservation Area and there are and non-designated heritage assets in proximity of the site. The effects of development on the setting of the Conservation Area and non-designated heritage assets are not known at this stage *and require further assessment*.

Scope

- 5.3. Scoping is the process of agreeing the scope and level of detail of the information to go in an *Environmental Report*. The outcome of scoping is an agreed evidence base and SEA 'framework' of objectives for the assessment of a Neighbourhood Plan. It is important that the scoping report provides relevant information as the successful examination of the Neighbourhood Plan can depend on it.
- 5.4. The SEA Regulations require that the consultation bodies be given five weeks to comment on the scope of the assessment. The scoping report was subject to consultation with the relevant statutory consultation bodies, namely the Environment Agency, Historic England and Natural England, from June to August 2021. Responses received during the consultation are summarised in Section 1 and set out in full in Appendix 1. The responses were reviewed and confirm that the statutory consultation bodies agree with the scope of the assessment.
- 5.5. The scope of the SEA should be *proportionate*. The screening stage (see Section 4) considered a wide range of environmental themes, policy matters, designations and constraints. For many issues, the screening assessment concluded that no likely significant effects will arise from implementation of the INP – such matters were *screened out*.
- 5.6. Through the initial screening exercise, ECDC is unable to rule out likely significant effects on the environment as a result of implementation of the INP in relation to potential effects on County Wildlife sites, the setting of Isleham Conservation Area, and groundwater resources in a Source Protection Zone. Potential likely significant effects were identified in relation to additional growth as a result of proposed site allocation ISL7 only, since the policy provides additional opportunities for growth not accounted for in the SA/SEA of the Local Plan.
- 5.7. Whilst the INP provides other opportunities for other forms of development, such as infill development within the updated Development Envelope, rural affordable housing exception sites, and rural workers, these types of development are already acceptable in principle through the Local Plan 2015. The Local Plan policies which enable these forms of development were subject to SEA through Sustainability Appraisal of the Local Plan.
- 5.8. Consequently, the scope of the SEA *could* be limited only to those matters where there is potential for likely significant effects to arise. To consider other issues would be unnecessary and disproportionate. In other words, for the purposes of this SEA, their effects can be assumed to be 'neutral'.

- 5.9. For the avoidance of doubt, no likely significant effects were identified in respect of European Sites, and a HRA is not required.
- 5.10. To ensure the SEA is relevant, it must be locally specific. In formulating a SEA Framework, this assessment utilises the framework provided in ECDC's *SA Scoping Report (March 2021)*³⁷.
- 5.11. Section 3 - *Key information on the emerging Neighbourhood Plan and neighbourhood area* explores the INP's proposals, the policy context, neighbouring authorities' plans, and explores a broad range of environmental constraints. For the purposes of SEA, section 3 provides a 'baseline' of key environmental characteristics and constraints.

Consideration of reasonable alternatives

- 5.12. It is a requirement of the SEA process to assess 'reasonable alternatives'. Section 4: *Potential site allocation and 'reasonable alternatives'*, takes into account environmental constraints, the policy context and recent planning decisions, and concludes that there are other potentially suitable locations for new development within or adjoining Isleham village.
- 5.13. Section 4 identifies five 'areas of search' for alternative site allocations, as indicated on Map 14. These are:
- AOS1 - Land west of Hall Barn Road, south of Cornwell Close
 - AOS2 - Woodland south of Aves Close
 - AOS3 - Land north of The Causeway, south of Sun Street
 - AOS4 - Land north of Beck Road, south of Festival Road
 - AOS5 - Land west of Sheldrick's Road
- 5.14. A further potential 'alternative' is to not allocate a site through the INP. In other words, omit proposed site allocation ISL7, with all other elements of the INP remaining the same. In accordance with NPPF para. 66, ECDC has issued Isleham Parish Council with an indicative housing requirement figure of zero dwellings. Therefore, there is no strategic requirement to deliver additional major development through the INP.
- 5.15. Whilst a requirement of the SEA process, the consideration of 'reasonable alternatives' is somewhat problematic in the context of neighbourhood planning.

*Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. **They are able to choose where they want new homes, shops and offices to be built...***

Planning Practice Guidance Paragraph: 001 Reference ID: 41-001-20190509 (emphasis added)

- 5.16. As indicated by the planning practice guidance, Neighbourhood Plans should reflect the community's 'shared vision'. However, there are no guarantees that this shared vision will align with the recommendations of the SEA. For example, local people may not prefer the 'reasonable alternative' site which scores most favourably in the context of SEA. The SEA cannot, therefore, dictate which growth strategy a Neighbourhood Plan adopts. If a Neighbourhood Plan does not reflect the views and aspirations of local people, it may fail to gain the necessary support at the referendum stage. The community's views on sites within Areas of Search 1-5 are not known.
- 5.17. In addition, AOS 1-5 have been identified through a desk-based assessment. The availability of land is not known. If land is available, it is not known if the landowner's aspirations reflect the community's aspiration for development which meets local affordable housing needs.

³⁷ https://www.eastcambs.gov.uk/sites/default/files/Final%20Scoping%20Report%20-%20Local%20Plan%202036AC_0.pdf

- 5.18. It is arguable whether an option to not allocate any site can truly be considered 'reasonable' since there is a clear community aspiration to deliver new development, particularly development which meets local needs for affordable housing.
- 5.19. In summary, for the purposes of SEA, the 'options' to be assessed are:
- Proposed site allocation ISL7;
 - 'Reasonable alternative' sites located within Areas of Search 1-5; and
 - No site allocation.

SEA Framework

- 5.20. The purpose of the SEA framework is to further explore the issues identified as being within the scope of this assessment and identify mechanisms to avoid environmental harm, such as mitigation measures or pursuing an alternative strategy. The outcomes of the SEA process should directly inform preparation of the INP and support it in satisfying the *Basic Conditions* for neighbourhood planning.
- 5.21. ECDC has recently updated its Sustainability Appraisal Framework (SA Framework) for the purposes of undertaking a *Single Issue Review* of its Local Plan. The SA Framework was developed in consultation with the statutory bodies, with a scoping report published in March 2021, and incorporates the requirements of SEA.
- 5.22. The likely significant environmental effects of proposed site allocation ISL7 have been considered in Section 4, and a number of potential effects have been screened out. However, pursuing an alternative option (such as allocating an alternative site in AOS1-5 or allocating no sites) has the potential to give rise to environmental effects which have not been considered in this scoping report. To fully assess the implications of the alternative option, it is necessary to extend the scope of the assessment beyond those issues where potential likely effects have been identified in respect of the draft INP, and appraise all options against ECDC's complete SA Framework.
- 5.23. Following review of responses received during consultation on the Scoping Report, no amendments to the SEA Framework are required.
- 5.24. Table 5 sets out the SA Topics, SA Objectives and Decision-making criteria which form the *SEA Framework*.

TABLE 5: SEA FRAMEWORK AND KEY QUESTIONS

SA topic	SA Objective	Key Questions
1 Land and water resources	1.1 Minimise the irreversible loss of undeveloped land and productive agricultural holdings	<ul style="list-style-type: none"> • Will it optimise the use of previously developed land, buildings and existing infrastructure? • Will it use land efficiently? • Will it protect and enhance the best and most versatile agricultural land?
	1.2 Reduce the use of non-renewable resources including energy sources and increase the use of renewable energy	<ul style="list-style-type: none"> • Will it reduce energy consumption? • Will it increase the proportion of energy needs being met from renewable sources?
	1.3 Limit water consumption to levels supportable by natural processes and storage systems	<ul style="list-style-type: none"> • Will it reduce water consumption? • Will it conserve ground water resources?
2 Biodiversity	2.1 Avoid damage to designated statutory and non-statutory sites and protected species	<ul style="list-style-type: none"> • Will it protect sites designated for nature conservation interest? • Will it mitigate against any harm caused by proposed development?
	2.2 Maintain and enhance the range and viability of characteristic habitats and species	<ul style="list-style-type: none"> • Will it conserve species, reverse declines, and help to enhance diversity? • Will it reduce habitat fragmentation? • Will it help achieve Biodiversity Action Plan targets?
	2.3 Improve opportunities for people to access and appreciate wildlife and wild places	<ul style="list-style-type: none"> • Will it improve access to wildlife, and wild places? • Will it maintain or increase the area of high-quality green space? • Will it promote understanding and appreciation of wildlife?
3 Landscape, townscape and archaeology	3.1 Conserve, sustain and enhance the historic environment including the significance of designated and non-designated heritage assets (and any contribution made to that significance by setting)	<ul style="list-style-type: none"> • Will it protect or enhance sites, features or areas of historical, archaeological, or cultural interest and their settings? • Will it foster heritage-led sustainable tourism?
	3.2 Maintain and enhance the diversity and distinctiveness of landscape and townscape character	<ul style="list-style-type: none"> • Will it maintain and enhance the diversity and distinctiveness of landscape and townscape character? • Will it protect and enhance open spaces of amenity and recreational value? • Will it maintain and enhance the character of settlements?
	3.3 Create places, spaces and buildings that work well, wear well and look good	<ul style="list-style-type: none"> • Will it improve the satisfaction of people with their neighbourhoods as places to live? • Will it lead to developments built to a high standard of design?
4 Environment and pollution	4.1 Reduce emissions of greenhouse gasses and other pollutants (including air, water, soil, noise, vibration and light)	<ul style="list-style-type: none"> • Will it reduce emissions of greenhouse gases? • Will it improve air quality? • Will it reduce traffic volumes? • Will it support travel by means other than the car? • Will it reduce levels of noise? • Will it reduce or minimise light pollution? • Will it reduce water pollution?
	4.2 Minimise waste production and support the recycling of waste products	<ul style="list-style-type: none"> • Will it reduce household waste? • Will it increase waste reuse and recycling? • Will it reduce waste from other sources?

SA topic	SA Objective	Key Questions
	4.3 Limit or reduce vulnerability to the effects of climate change (including flooding)	<ul style="list-style-type: none"> • Will it minimise risk to people and property from flooding, storm events or subsidence? • Will it improve the adaptability of buildings to changing temperatures? • Will it reduce waste from other sources? • Will it reduce carbon footprint?
	4.4 Environment	<ul style="list-style-type: none"> • Will it protect, enhance and manage the character and appearance of landscape/townscape, maintaining and strengthening local distinctiveness and sense of place? • Will it protect, manage and improve local environmental quality and help towards 'doubling nature' in Cambridgeshire? • Will it achieve high quality sustainable design for buildings, spaces and the public realm?
5 Healthy communities	5.1 Maintain and enhance human health	<ul style="list-style-type: none"> • Will it reduce death rates? • Will it encourage healthy lifestyles?
	5.2 Reduce and prevent crime, and reduce the fear of crime	<ul style="list-style-type: none"> • Will it reduce actual levels of crime? • Will it reduce fear of crime?
	5.3 Improve the quantity and quality of publicly accessible open space	<ul style="list-style-type: none"> • Will it increase the quantity and quality of publicly accessible open space?
6 Inclusive communities	6.1 Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities)	<ul style="list-style-type: none"> • Will it improve accessibility to key local services and facilities? • Will it improve accessibility by means other than the car? • Will it support and improve community and public transport? • Will it improve and broaden access to the local historic environment?
	6.2 Redress inequalities related to age, gender, disability, race, faith, location and income	<ul style="list-style-type: none"> • Will it improve relations between people from different backgrounds or social groups? • Will it reduce poverty and social exclusion in those areas most affected? • Will it promote accessibility for all members of society?
	6.3 Ensure all groups have access to decent, appropriate and affordable housing	<ul style="list-style-type: none"> • Will it support the provision of a range of housing types and sizes to meet the identified needs of all sectors of the community? • Will it reduce the number of unfit homes? • Will it meet the needs of the travelling community?
	6.4 Encourage and enable the active involvement of local people in community activities	<ul style="list-style-type: none"> • Will it increase the ability of people to influence decisions? • Will it provide better opportunities for people to understand local heritage, buildings and to participate in cultural and leisure activities?
7 Economic activity	7.1 Help people gain access to satisfying work appropriate to their skills, potential and place of residence	<ul style="list-style-type: none"> • Will it encourage business development? • Will it improve the range of employment opportunities? • Will it improve access to employment / access to employment by means other than the car? • Will it encourage the rural economy and diversification?

SA topic	SA Objective	Key Questions
	7.2 Support appropriate investment in people, places, communications and other infrastructure	<ul style="list-style-type: none"> • Will it improve the level of investment in key community services and infrastructure? • Will it support provision of key infrastructure? • Will it improve access to education and training, and support provision of skilled employees? • Will it foster heritage-led regeneration and address heritage at risk?
	7.3 Improve the efficiency, competitiveness, vitality and adaptability of the local economy	<ul style="list-style-type: none"> • Will it improve business development and enhance competitiveness? • Will it support Cambridgeshire's lead role in research and technology-based industries, higher education and research? • Will it support sustainable tourism? • Will it protect the shopping hierarchy, supporting vitality and viability? • Will it support the sustainable use of historic farmsteads?

5.25. Table 6 provides a key to the appraisal symbols which will be used in assessing the various options.

TABLE 6: KEY TO APPRAISAL SYMBOLS

Symbol	Likely effect upon the SA Objective
+++	Strong and significant beneficial impact
++	Potentially significant beneficial impact
+	Policy or proposal supports this objective although it may only have a minor beneficial impact
~	Policy or proposal has no impact or effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant
?	Uncertain or insufficient information on which to determine the assessment at this stage
-	Policy or proposal appears to conflict with the objective and may result in adverse impacts
--	Potentially significant adverse impact
---	Strong and significant adverse impact

Evidence Gathering and Assessment

- 5.26. To fully assess the likely significant effects of the various options, ECDC must gather additional evidence. Section 4 identifies the 'Areas of Search' (AOS) by virtue of them being relatively unconstrained. ECDC has carried out further desk-based assessment of AOSs 1 to 5.
- 5.27. Consultation on the Scoping Report provided opportunities for statutory consultation bodies to express their views on proposed site allocation ISL7 and AOS 1-5. During preparation of this Environmental Report, ECDC provided the statutory consultation bodies with opportunity to comment on the baseline findings and assessment of SA ISL7 and AOS 1-5.
- 5.28. Responses to this informal consultation were received from Historic England and Natural England, and are presented in Appendix 3. Historic England raised concerns that the baseline assessment did not adequately identify non-designated heritage assets of archaeological significance. To address this, ECDC consulted Cambridgeshire County Council's Historic Environment Team who supplied data on such assets in Isleham and provided archaeological advice in respect of the Areas of Search. The archaeological advice supplied by the Historic Environment Team is provided at Appendix 4. The baseline assessment in section 3 has been updated to include archaeological assets in Isleham.
- 5.29. In assessing SA ISL7 and AOS 1-5, ECDC has had regard to the capacity of local infrastructure and services, namely primary education. In its review of recent planning decisions, section 4 identifies constraints in local infrastructure as a common reason for refusal of proposals for major development.

Baseline for Alternative Site Options

- 5.30. A desk-based assessment was carried out to provide an overview of the Neighbourhood Area's key environmental constraints and characteristics, drawing on available datasets relevant to the various SEA themes. This information set the baseline used in the screening assessment and is presented in Table 3 (Section 3).
- 5.31. For the purposes of setting a baseline for the Alternative Site Options those same datasets were again interrogated, in the context of each alternative site option (i.e. proposed site allocation ISL7 and Areas of Search to 1 to 5). The results of this GIS analysis is presented in Table 7, and forms baseline data to enable assessment of the alternative site options.

TABLE 7: BASELINE - ALTERNATIVE SITE OPTIONS

Potential environmental constraint	Proximity metric	Data source	SA ISL7	AOS1	AOS2	AOS3	AOS4	AOS5
National Parks	Neighbourhood Area + 8km due to potential for increased visitor pressure from new development	https://data.gov.uk/dataset/334e1b27-e193-4ef5-b14e-696b58bb7e95/national-parks-england	Is not in proximity of a National Park	Is not in proximity of a National Park	Is not in proximity of a National Park	Is not in proximity of a National Park	Is not in proximity of a National Park	Is not in proximity of a National Park
Areas of Outstanding Natural Beauty (AONB)	Neighbourhood Area + 8km due to potential for increased visitor pressure from new development	https://data.gov.uk/dataset/8e3ae3b9-a827-47f1-b025-f08527a4e84e/areas-of-outstanding-natural-beauty-england	Is not in proximity of a AONB.	Is not in proximity of a AONB.	Is not in proximity of a AONB.	Is not in proximity of a AONB.	Is not in proximity of a AONB.	Is not in proximity of a AONB.
European sites	Neighbourhood Area + 30km due to potential for effects on functionally related land	https://data.gov.uk/dataset/67b4ef48-d0b2-4b6f-b659-4efa33469889/ramsar-ar-england https://data.gov.uk/dataset/a85e64d9-d0f1-4500-9080-b0e29b81fbc8/special-areas-of-conservation-england	<p>The site does not intersect a SPA, SAC or Ramsar site. The following internationally designated sites are within 30km of the site:</p> <p>Breckland SPA / SAC Fenland (Chippenham Fen) SAC / Ramsar Devils Dyke SAC Fenland (Wicken Fen) SAC / Ramsar Norfolk Valley Fens SAC Ouse Washes SPA / SAC / Ramsar Rex Graham Reserve SAC</p>	<p>The site does not intersect a SPA, SAC or Ramsar site. The following internationally designated sites are within 30km of the site:</p> <p>Breckland SPA / SAC Fenland (Chippenham Fen) SAC / Ramsar Devils Dyke SAC Fenland (Wicken Fen) SAC / Ramsar Norfolk Valley Fens SAC Ouse Washes SPA / SAC / Ramsar Rex Graham Reserve SAC</p>	<p>The site does not intersect a SPA, SAC or Ramsar site. The following internationally designated sites are within 30km of the site:</p> <p>Breckland SPA / SAC Fenland (Chippenham Fen) SAC / Ramsar Devils Dyke SAC Fenland (Wicken Fen) SAC / Ramsar Norfolk Valley Fens SAC Ouse Washes SPA / SAC / Ramsar Rex Graham Reserve SAC</p>	<p>The site does not intersect a SPA, SAC or Ramsar site. The following internationally designated sites are within 30km of the site:</p> <p>Breckland SPA / SAC Fenland (Chippenham Fen) SAC / Ramsar Devils Dyke SAC Fenland (Wicken Fen) SAC / Ramsar Norfolk Valley Fens SAC Ouse Washes SPA / SAC / Ramsar Rex Graham Reserve SAC</p>	<p>The site does not intersect a SPA, SAC or Ramsar site. The following internationally designated sites are within 30km of the site:</p> <p>Breckland SPA / SAC Fenland (Chippenham Fen) SAC / Ramsar Devils Dyke SAC Fenland (Wicken Fen) SAC / Ramsar Norfolk Valley Fens SAC Ouse Washes SPA / SAC / Ramsar Rex Graham Reserve SAC</p>	<p>The site does not intersect a SPA, SAC or Ramsar site. The following internationally designated sites are within 30km of the site:</p> <p>Breckland SPA / SAC Fenland (Chippenham Fen) SAC / Ramsar Devils Dyke SAC Fenland (Wicken Fen) SAC / Ramsar Norfolk Valley Fens SAC Ouse Washes SPA / SAC / Ramsar Rex Graham Reserve SAC</p>

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Sites of Special Scientific Interest (SSSIs)	Neighbourhood Area + 8km due to potential for increased visitor pressure from new development	https://data.gov.uk/dataset/5b632bd7-9838-4ef2-9101-ea9384421b0d/sites-of-special-scientific-interest-england	There are no SSSIs on site. The following SSSIs are within 8km of the site: Brackland Rough Breckland Farmland Breckland Forest Cam Washes Cavenham - Icklingham Heaths Cherry Hill and The Gallops, Barton Mills Chippenham Fen and Snailwell Poor's Fen Delph Bridge Drain Ely Pits and Meadows Foxhole Heath, Eriswell Lord's Well Field Newmarket Heath Red Lodge Heath Rex Graham Reserve Shippea Hill Snailwell Meadows Soham Wet Horse Fen Stallode Wash, Lakenheath Upware Bridge Pit North Upware North Pit Wilde Street Meadow	There are no SSSIs on site. The following SSSIs are within 8km of the site: Brackland Rough Breckland Farmland Breckland Forest Cam Washes Cavenham - Icklingham Heaths Cherry Hill and The Gallops, Barton Mills Chippenham Fen and Snailwell Poor's Fen Delph Bridge Drain Ely Pits and Meadows Foxhole Heath, Eriswell Lord's Well Field Newmarket Heath Red Lodge Heath Rex Graham Reserve Shippea Hill Snailwell Meadows Soham Wet Horse Fen Stallode Wash, Lakenheath Upware Bridge Pit North Upware North Pit Wicken Fen Wilde Street Meadow	There are no SSSIs on site. The following SSSIs are within 8km of the site: Brackland Rough Breckland Farmland Breckland Forest Cam Washes Cavenham - Icklingham Heaths Cherry Hill and The Gallops, Barton Mills Chippenham Fen and Snailwell Poor's Fen Delph Bridge Drain Ely Pits and Meadows Foxhole Heath, Eriswell Lord's Well Field Newmarket Heath Red Lodge Heath Rex Graham Reserve Shippea Hill Snailwell Meadows Soham Wet Horse Fen Stallode Wash, Lakenheath Upware Bridge Pit North Upware North Pit Wilde Street Meadow	There are no SSSIs on site. The following SSSIs are within 8km of the site: Brackland Rough Breckland Farmland Breckland Forest Cam Washes Cavenham - Icklingham Heaths Cherry Hill and The Gallops, Barton Mills Chippenham Fen and Snailwell Poor's Fen Ely Pits and Meadows Foxhole Heath, Eriswell Lord's Well Field Newmarket Heath Red Lodge Heath Rex Graham Reserve Shippea Hill Snailwell Meadows Soham Wet Horse Fen Stallode Wash, Lakenheath Upware Bridge Pit North Upware North Pit Wilde Street Meadow	There are no SSSIs on site. The following SSSIs are within 8km of the site: Brackland Rough Breckland Farmland Breckland Forest Cam Washes Cavenham - Icklingham Heaths Cherry Hill and The Gallops, Barton Mills Chippenham Fen and Snailwell Poor's Fen Ely Pits and Meadows Foxhole Heath, Eriswell Lord's Well Field Newmarket Heath Red Lodge Heath Rex Graham Reserve Shippea Hill Snailwell Meadows Soham Wet Horse Fen Stallode Wash, Lakenheath Upware Bridge Pit North Upware North Pit Wilde Street Meadow	There are no SSSIs on site. The following SSSIs are within 8km of the site: Brackland Rough Breckland Farmland Breckland Forest Cam Washes Cavenham - Icklingham Heaths Cherry Hill and The Gallops, Barton Mills Chippenham Fen and Snailwell Poor's Fen Ely Pits and Meadows Foxhole Heath, Eriswell Lord's Well Field Newmarket Heath Red Lodge Heath Rex Graham Reserve Shippea Hill Snailwell Meadows Soham Wet Horse Fen Stallode Wash, Lakenheath Upware Bridge Pit North Upware North Pit Wilde Street Meadow
World Heritage Sites	Neighbourhood Area + 400m due to potential impacts on setting	https://data.gov.uk/dataset/3ac5c299-6805-476b-af9b-90aadec5e7b4/world-heritage-sites-gis-data	Site is not in proximity of a WHS.	Site is not in proximity of a WHS.	Site is not in proximity of a WHS.	Site is not in proximity of a WHS.	Site is not in proximity of a WHS.	Site is not in proximity of a WHS.
Registered Battlefields	Neighbourhood Area + 400m due to potential impacts on setting	https://data.gov.uk/dataset/3b327613-faa1-4d0b-8fb8-75436fed80cc/registered-battlefields-gis-data	Site is not in proximity of a Registered Battlefield.	Site is not in proximity of a Registered Battlefield.	Site is not in proximity of a Registered Battlefield.	Site is not in proximity of a Registered Battlefield.	Site is not in proximity of a Registered Battlefield.	Site is not in proximity of a Registered Battlefield.

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Scheduled Monuments	Neighbourhood Area + 400m due to potential impacts on setting	https://data.gov.uk/dataset/726484b0-d14e-44a3-9621-29e79fc47bfc/national-nature-reserves-england	No SM on site. Lime Kilns SM within 400m.	No SM on site or within 400m.	No SM on site. Isleham Priory SM and Lime Kilns SM within 400m.	No SM on site. Isleham Priory SM and Lime Kilns SM within 400m.	No SM on site. Lime Kilns SM within 400m.	No SM on site or within 400m.
National Nature Reserve (NNR)	Neighbourhood Area + 8km due to potential for increased visitor pressure from new development	https://data.gov.uk/dataset/726484b0-d14e-44a3-9621-29e79fc47bfc/national-nature-reserves-england	No NNR on site. Chippenham Fen NNR is within 8km of the site.	No NNR on site. Chippenham Fen NNR and Wicken Fen NNR are within 8km of the site.	No NNR on site. Chippenham Fen NNR is within 8km of the site.	No NNR on site. Chippenham Fen NNR is within 8km of the site.	No NNR on site. Chippenham Fen NNR is within 8km of the site.	No NNR on site. Chippenham Fen NNR is within 8km of the site.

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Nationally listed buildings	Neighbourhood Area + 400m due to potential impacts on setting	https://data.gov.uk/dataset/8db67112-67b0-43f2-b863-2ac9c58d52bf/listed-buildings-gis-data	<p>There are no LBs on site. The following listed buildings are within 400m of the site:</p> <p>1 Mill Street (Grade II) 12 West Street (Grade II) 18 Mill Street (Grade II) 41 Mill Street (Grade II) 45 Mill Street (Grade II) Barn rear of No. 3 (Colsor) (Grade II) Colsor (Grade II) Inisfail (Grade II) Lime Kilns (Grade II) Red Lion Public House (Grade II)</p>	<p>There are no LBs on site. The following listed buildings are within 400m of the site:</p> <p>Barn and warehouse (Grade II) Red Lion Public House (Grade II) Isleham Hall (Grade II)</p>	<p>There are no LBs on site. The following listed buildings are within 400m of the site:</p> <p>Isleham Hall (Grade II) 1, Mill Street (Grade II) 7, Church Street (Grade II) 10, Little London Lane (Grade II) 2, Sun Street (Grade II) War Memorial (Grade II) Griffin Hotel (Grade II) 41, Mill Street (Grade II) 18, Little London Lane (Grade II) 13, Church Street (Grade II) Inisfail (Grade II) The Corner House (Grade II) 18, Mill Street (Grade II) Lych Gate (Grade II) Church Of St Andrew (Grade I) 6, Sun Street (Grade II) Priory Church Of St Margaret Of Antioch (Grade I) Lime Kilns (Grade II) 12, West Street (Grade II) Barn,Rear Of Number 3 (Colsor) (Grade II) Red Lion Public House (Grade II) 5, Mill Street (Grade II) 45, Mill Street (Grade II) The Manor House (Grade II) Colsor (Grade II)</p>	<p>There are no LBs on site. The following listed buildings are within 400m of the site:</p> <p>Lady Peytons Almshouses (Grade II) 79, The Causeway (Grade II) 1, Mill Street (Grade II) 7, Church Street (Grade II) 2, Sun Street (Grade II) War Memorial (Grade II) Griffin Hotel (Grade II) 13, Church Street (Grade II) The Corner House (Grade II) 24, Pound Lane (Grade II) Lych Gate (Grade II) The Rising Sun Public House (Grade II) Church Of St Andrew (Grade I) 6, Sun Street (Grade II) Priory Church Of St Margaret Of Antioch (Grade I) Sunbury House (Grade II) Lime Kilns (Grade II) 10, Sun Street (Grade II) 5, Mill Street (Grade II) The Manor House (Grade II) Baptist Chapel (Grade II) 21, Sun Street (Grade II)</p>	<p>There are no LBs on site. The following listed buildings are within 400m of the site:</p> <p>10, Sun Street (Grade II) 2, Sun Street (Grade II) Lady Peytons Almshouses (Grade II) 41, Mill Street (Grade II) 79, The Causeway (Grade II) 7, Church Street (Grade II) 45, Mill Street (Grade II) 6, Sun Street (Grade II) The Corner House (Grade II) Sunbury House (Grade II) Lime Kilns (Grade II)</p>	<p>There are no LBs on site. The following listed buildings are within 400m of the site:</p> <p>Sunbury House (Grade II) 79, The Causeway (Grade II)</p>
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Buildings at risk	Neighbourhood Area + 400m due to potential impacts on setting	https://historicengland.org.uk/listing/the-list/data-downloads	Is not in proximity of HAR.	Is not in proximity of HAR.	Is not in proximity of HAR.	Is not in proximity of HAR.	Is not in proximity of HAR.	Is not in proximity of HAR.
Conservation area	Neighbourhood Area + 400m due to potential impacts on setting	https://www.eastcambs.gov.uk/conservation/conservation-areas-east-cambridgeshire	Site is adjacent to Isleham Conservation Area.	Site is within 400m of Isleham Conservation Area.	Site is adjacent to Isleham Conservation Area.	Site is within 400m of Isleham Conservation Area.	Site is within 400m of Isleham Conservation Area.	Site is within 400m of Isleham Conservation Area.
Registered Parks & Gardens	Neighbourhood Area + 400m due to potential impacts on setting	https://historicengland.org.uk/listing/the-list/data-downloads	Is not in proximity of Registered Parks & Gardens.	Is not in proximity of Registered Parks & Gardens.	Is not in proximity of Registered Parks & Gardens.	Is not in proximity of Registered Parks & Gardens.	Is not in proximity of Registered Parks & Gardens.	Is not in proximity of Registered Parks & Gardens.
Flood zone 3a and 3b	Neighbourhood Area	https://data.gov.uk/dataset/bed63fc1-dd26-4685-b143-2941088923b3/flood-map-for-planning-rivers-and-sea-flood-zone-3	Site wholly in Flood Zone 1.	Site wholly in Flood Zone 1.	Site wholly in Flood Zone 1.	Site wholly in Flood Zone 1.	Site wholly in Flood Zone 1.	Site wholly in Flood Zone 1.
Air Quality Management	Neighbourhood Area + 8km due to potential for impacts on road network beyond Neighbourhood Area.	https://uk-air.defra.gov.uk/aqma/maps/	No AQMA on site or within 8km buffer	No AQMA on site or within 8km buffer	No AQMA on site or within 8km buffer	No AQMA on site or within 8km buffer	No AQMA on site or within 8km buffer	No AQMA on site or within 8km buffer
Best and most versatile agricultural land	Neighbourhood Area	https://data.gov.uk/dataset/952421ec-da63-4569-817d-4d6399df40a1/provisional-agricultural-land-classification-alc	Site is Grade 2 ALC.	Site is Grade 2 ALC.	Site is Grade 2 ALC.	Site is Grade 2 ALC.	Site is Grade 2 ALC.	Site is Grade 2 ALC.

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Soil Types	Neighbourhood Area	https://magic.defra.gov.uk/Metadata_for_MAGIC/magsoilscape.html	Freely draining lime-rich loamy soils	Freely draining lime-rich loamy soils	Shallow lime-rich soils over chalk or limestone	Shallow lime-rich soils over chalk or limestone	Shallow lime-rich soils over chalk or limestone	Shallow lime-rich soils over chalk or limestone; Freely draining lime-rich loamy soils
Source Protection Zones	Neighbourhood Area	https://data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26bbf5/source-protection-zones-merged	Southern 'half' of site intersects SPZs 1 & 3.	No SPZ on site	No SPZ on site	No SPZ on site	No SPZ on site	No SPZ on site
Locally designated nature conservation site	Neighbourhood Area + 400m due to potential impacts of urbanisation	https://www.eastcambs.gov.uk/local-development-framework/east-cambridgeshire-local-plan-2015-policies-map	No CWS on site or within 400m buffer.	No CWS on site or within 400m buffer.	No CWS on site or within 400m buffer.	No CWS on site or within 400m buffer.	No CWS on site or within 400m buffer.	No CWS on site or within 400m buffer.
Local Nature Reserves	Neighbourhood Area + 400m due to potential impacts of urbanisation	https://data.gov.uk/dataset/acdf4a9e-a115-41fb-bbe9-603c819aa7f7/local-nature-reserves-england	Is not in proximity of a LNR.	Is not in proximity of a LNR.	Is not in proximity of a LNR.	Is not in proximity of a LNR.	Is not in proximity of a LNR.	Is not in proximity of a LNR.
Irreplaceable habitats such as ancient woodland, ancient and veteran trees) and priority habitats	Neighbourhood Area + 400m due to potential impacts of urbanisation	https://naturalengland.defra.opendata.arcgis.com/datasets/priority-habitat-inventory-central-england/data?geometry=0.166%2C52.233%2C0.427%2C52.270	No priority habitat on site.	No priority habitat on site.	The site is partly intersected by a Priority Habitat (deciduous woodland) at its northern boundary.	No priority habitat on site.	Priority habitat (traditional orchard) is located on site and covers most of site area.	No priority habitat on site.
Non-designated and locally listed historic environment assets	Neighbourhood Area	https://www.eastcambs.gov.uk/sites/default/files/Final%20Document_4.pdf	Is not in proximity of a Building of Local Interest.	Is not in proximity of a Building of Local Interest.	Is not in proximity of a Building of Local Interest.	Is not in proximity of a Building of Local Interest.	Is not in proximity of a Building of Local Interest.	Is not in proximity of a Building of Local Interest.
Areas of high archaeological potential	Neighbourhood Area	CCC's Historic Environment Record	Undated ditches and post holes (MCB30317)	None on site	None on site	An area of post medieval quarrying (MCB31149)	Site of former limestone quarry at Isleham (MCB22019)	None on site

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Locations where air quality is monitored due to potential exceedances to air quality objectives	Neighbourhood Area	https://www.eastcambs.gov.uk/pollution/air-quality	Is not in proximity of an area where air quality is monitored due to potential exceedances to air quality objectives.	Is not in proximity of an area where air quality is monitored due to potential exceedances to air quality objectives.	Is not in proximity of an area where air quality is monitored due to potential exceedances to air quality objectives.	Is not in proximity of an area where air quality is monitored due to potential exceedances to air quality objectives.	Is not in proximity of an area where air quality is monitored due to potential exceedances to air quality objectives.	Is not in proximity of an area where air quality is monitored due to potential exceedances to air quality objectives.
Areas with surface water flooding issues	Neighbourhood Area	https://www.eastcambs.gov.uk/local-development-framework/strategic-flood-risk-assessment-pslp-document-library	Site area at risk of surface water flooding: 30 yr event - 0% 100 yr event - 0% 1000 yr event - 0%	Site area at risk of surface water flooding: 30 yr event - 0% 100 yr event - 0.26% 1000 yr event - 1.16%	Site area at risk of surface water flooding: 30 yr event - 0% 100 yr event - 0% 1000 yr event - 0%	Site area at risk of surface water flooding: 30 yr event - 0% 100 yr event - 5.98% 1000 yr event - 22.83%	Site area at risk of surface water flooding: 30 yr event - 0% 100 yr event - 0.81% 1000 yr event - 2.13%	Site area at risk of surface water flooding: 30 yr event - 0% 100 yr event - 0% 1000 yr event - 0.06%
Areas with significant areas of contaminated land	Neighbourhood Area	https://www.eastcambs.gov.uk/local-development-framework/strategic-flood-risk-assessment-pslp-document-library	Does not intersect landfill site.	Does not intersect landfill site.	Does not intersect landfill site.	Does not intersect landfill site.	Does not intersect landfill site.	Does not intersect landfill site.
Locations within coastal change management areas	Neighbourhood Area + 8km due to potential for increased visitor pressure from new development	http://publications.naturalengland.org.uk/file/5869554089852928	Is not in proximity of a CCMA.	Is not in proximity of a CCMA.	Is not in proximity of a CCMA.	Is not in proximity of a CCMA.	Is not in proximity of a CCMA.	Is not in proximity of a CCMA.
National Character Areas	Neighbourhood Area	https://data.gov.uk/dataset/21104eeb-4a53-4e41-8ada-d2d442e416e0/national-character-areas-england	Site is within NCA 46 - The Fens	Site is within NCA 46 - The Fens	Site is within NCA 46 - The Fens	Site is within NCA 46 - The Fens	Site is within NCA 46 - The Fens	Site is within NCA 46 - The Fens

SEA Framework – Assessment of Alternative Site Options

5.32. The SEA Framework was populated for each Alternative Site Option, having regard to the environmental characteristics and constraints presented in Table 7. The full, populated SEA Framework is provided in *Appendix 2: SEA Framework – Alternative Site Options*.

5.33. A summary of the SEA Framework scoring, without the full commentary, is provided in Table 8.

TABLE 8: SUMMARY OF SEA FRAMEWORK SCORING - ALTERNATIVE SITE OPTIONS

SA topic	SA Objective	SA ISL7	AOS1	AOS2	AOS3	AOS4	AOS5	No site allocation (omit site policy)
1 Land and water resources	1.1 Minimise the irreversible loss of undeveloped land and productive agricultural holdings	-	-	-	-	-	-	~
	1.2 Reduce the use of non-renewable resources including energy sources and increase the use of renewable energy	-	-	-	-	-	-	~
	1.3 Limit water consumption to levels supportable by natural processes and storage systems	-	~	~	~	~	~	~
2 Biodiversity	2.1 Avoid damage to designated statutory and non-statutory sites and protected species	~	~	~	~	~	~	+
	2.2 Maintain and enhance the range and viability of characteristic habitats and species	~	~	~	~	~	~	~
	2.3 Improve opportunities for people to access and appreciate wildlife and wild places	+	+	+	+	+	+	~
3 Landscape, townscape and archaeology	3.1 Conserve, sustain and enhance the historic environment including the significance of designated and non-designated heritage assets (and any contribution made to that significance by setting)	~	~	~	~	~	~	~
	3.2 Maintain and enhance the diversity and distinctiveness of landscape and townscape character	~	~	~	~	~	~	~
	3.3 Create places, spaces and buildings that work well, wear well and look good	~	~	~	~	~	~	~
4 Environment and pollution	4.1 Reduce emissions of greenhouse gasses and other pollutants (including air, water, soil, noise, vibration and light)	-	-	-	-	-	-	~
	4.2 Minimise waste production and support the recycling of waste products	~	~	~	~	~	~	~
	4.3 Limit or reduce vulnerability to the effects of climate change (including flooding)	-	-	-	--	-	-	~
	4.4 Environment	~	~	~	~	~	~	~
5 Healthy communities	5.1 Maintain and enhance human health	+	+	+	+	+	+	~
	5.2 Reduce and prevent crime, and reduce the fear of crime	~	~	~	~	~	~	~
	5.3 Improve the quantity and quality of publicly accessible open space	+	+	+	+	+	+	~
6 Inclusive communities	6.1 Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities)	+	+	+	+	+	+	~
	6.2 Redress inequalities related to age, gender, disability, race, faith, location and income	++	+	+	+	+	+	~

	6.3 Ensure all groups have access to decent, appropriate and affordable housing	+	+	+	+	+	+	~
	6.4 Encourage and enable the active involvement of local people in community activities	+++	~	~	~	~	~	--
7 Economic activity	7.1 Help people gain access to satisfying work appropriate to their skills, potential and place of residence	~	~	~	~	~	~	~
	7.2 Support appropriate investment in people, places, communications and other infrastructure	+	+	+	+	+	+	~
	7.3 Improve the efficiency, competitiveness, vitality and adaptability of the local economy	~	~	~	~	~	~	~

Evaluation of Alternative Site Options

5.34. The Alternative Site Options include:

- Proposed Site Allocation ISL7 - *Land off Fordham Rd;*
- AOS1 - *Land west of Hall Barn Road, south of Cornwell Close;*
- AOS2 - *Woodland south of Aves Close;*
- AOS3 - *Land north of The Causeway, south of Sun Street;*
- AOS4 - *Land north of Beck Road, south of Festival Road;*
- AOS5 - *Land west of Sheldrick's Road;*
- Not site allocation i.e. omit site allocation policy.

5.35. As discussed in Section 4, the Areas of Search were identified as 'reasonable alternatives' for the purposes of SEA as the initial assessment identified those land parcels as relatively unconstrained areas of land adjoining the built area of Isleham village.

SA Objective 1.1: Minimise the irreversible loss of undeveloped land and productive agricultural holdings

5.36. All site options were identified as being in conflict with the objective. Whilst each site adjoins the built area, each has the potential to utilise existing infrastructure, each site is greenfield and grade 2 agricultural land. Therefore, development would result in a loss of land resources.

5.37. The extent to which each site makes efficient use of land will generally depend on the layout and design of the development scheme, and requirements of policies within the Development Plan and emerging INP.

5.38. The loss of land resources cannot be mitigated, but can be avoided by not developing a site. Consequently, the option to *not* allocate a site scored neutral/no impact in respect of the objective, since not allocating a site would not enable major development to take place.

SA Objective 1.2: Reduce the use of non-renewable resources including energy sources and increase the use of renewable energy

5.39. Each site adjoins the built area of Isleham and is accessible to some village services within a reasonable walking distance.

5.40. Isleham has a relatively limited range of services and employment opportunities, requiring travel to meet many day-to-day needs. Public transport is limited. All alternative site options would, if developed, likely be car-dependent. All site options were therefore identified as being in conflict with the objective.

5.41. The potential to meet energy needs from renewable sources will depend on the design of the development scheme.

- 5.42. It is unlikely that the effects of development could be mitigated. For example, increasing public transport infrastructure provision would likely prove disproportionately costly for a development site of the proposed scale to sustain.
- 5.43. The option to *not* allocate would not lead to major development to take place, and therefore the option would have no effect in respect of the objective – thereby avoiding harm.

SA Objective 1.3: Limit water consumption to levels supportable by natural processes and storage systems

- 5.44. Water consumption rates for homes are set out in building regulations and is therefore unaffected by the site option.
- 5.45. The southern 'half' of proposed site allocation ISL7 is located within Source Protection Zones 1 & 3. AOSs 1 to 5 are not located within a Source Protection Zone. Consequently, ISL7 has been identified as having adverse impacts in respect of the objective, and AOS 1-5 likely to have a neutral impact.
- 5.46. Source Protection Zones for groundwater sources such as wells, boreholes and springs used for public drinking water supply have been designated by the Environment Agency. These zones show the risk of contamination from any activities that might cause pollution in the area. Generally, the closer the activity, the greater the risk.
- 5.47. Potential effects on the Source Protection Zone can therefore be avoided by opting for a site within AOS 1 to 5, or by not allocating a site.
- 5.48. In its response to the *Scoping Report* consultation, the Environment Agency provided advice on the proposed site allocation and areas of search, suggesting that the potential effects of development could be mitigated.
- 5.49. In the response, Environment Agency confirmed it would likely to object to activities that could damage or diminish groundwater resources. Certain development proposals within an SPZ1 (inner protection zone), or the protection zone of a private potable groundwater supply will result in an 'Objection in Principle' under the Environment Agency's Groundwater Protection Policy. However, in a follow up telephone conversation, Environment Agency confirmed that major residential development would not necessarily warrant an objection.
- 5.50. Through the consultation response, the Environment Agency identified the following mitigation measures:
- The Environment Agency's groundwater protection hierarchy should be incorporated into plans and when proposing new development.
 - Proposals for new development or redevelopment should promote sustainable design, incorporate mitigation measures, account for climate change, and protect and enhance the water environment.
 - The assessment of contamination should be in line with Land Contamination Risk Management (LCRM) guidance and undertaken by suitably competent persons. Development proposals should only be permitted where it is demonstrated that any identified contamination is capable of being appropriately remediated or rendered innocuous to make the site suitable for the proposed end use.
 - The developer should address risks to controlled waters from contamination following the requirements of the National Planning Policy Framework and the Environment Agency Guiding Principles for Land Contamination.

- The development should support the Government's expectation that SuDS be provided in new developments. Infiltration SuDS need to meet the criteria in Groundwater Protection Position Statements G1 and G9 to G13.

SA Objective 2.1 Avoid damage to designated statutory and non-statutory sites and protected species

- 5.51. No Alternative Site Option is designated for nature conservation. However, all sites are in proximity of designated nature conservation sites. New development has the potential to increase recreational pressure on habitats.
- 5.52. During consultation on the Scoping Report, Natural England recommended the INP's site policy include a requirement for an ecological assessment that should *consider the effects of increased recreational pressure on [formerly] N2K sites*. Therefore, it is expected that any potential impacts will be adequately mitigated through this requirement.
- 5.53. Therefore it is considered that this policy requirement would enable any adverse impacts on designated sites to be adequately mitigated. Alternatively, *not* allocating a site would enable any potential for adverse impacts to be avoided.

SA Objective 2.2 Maintain and enhance the range and viability of characteristic habitats and species

- 5.54. No alternative site options are designated for nature conservation. There may be opportunities to provide a biodiversity net gain through the design of the development scheme. Therefore all site options are scored *neutral / no effect* in the SEA Framework.

SA Objective 2.3 Improve opportunities for people to access and appreciate wildlife and wild places

- 5.55. Isleham is located in East Cambridgeshire's rural. Each alternative site option adjoins the village and is surrounded by countryside, which is accessible by rural lanes and Public Rights of Way. In the locality there are numerous sites of nature conservation that are accessible to visitors. Therefore, all alternative site options are scored positively in the SEA Framework.

SA Objective 3.1 Conserve, sustain and enhance the historic environment including the significance of designated and non-designated heritage assets (and any contribution made to that significance by setting)

- 5.56. There are no designated heritage assets located on any alternative site option. However, all sites are in proximity of the Conservation Area (with some sites adjacent) and there are listed buildings and scheduled monuments in proximity of the site.
- 5.57. A number of the alternative site options are located in proximity of non-designated heritage assets of archaeological importance. Cambridgeshire County Council's Historic Environment Team were consulted through preparation of this assessment, and provided the following advice in respect of alternative site options:
- AOS1 – NGR 563840 273720 – Site immediately east of three known ring ditches representing remains of prehistoric barrow burials (MCB17114); a fourth probable ring ditch is also present (MCB31083). Multiple sites of metal detection finds of later prehistoric, Roman and Medieval date (eg. 07559, 07559A, MCB16203, 10866) are present to the west. Prehistoric evidence has been excavated immediately opposite the site on the east side of Hall Barn Rd (CB15282), which fieldwork has shown to extend alongside the road to the south (MCB28013). **Requires pre-determination fieldwork to enable evidence base to be supplied with any planning application.**
 - AOS2 – NGR 564180 274060 – Site immediately north of Iron Age and Medieval (11th-13th c.) remains, including post-built structures, previously excavated at Isleham

Recreation Ground (MCB20069, MCB22685). Prehistoric remains previously recorded in adjacent plot to west of site (MCB19231). SCHEDULED MONUMENT: Isleham priory at 240m NNW of this plot (NHLE ref 1013278); 19th century limekilns at 180m to NE. (NHLE 1006871). **Requires pre-determination fieldwork to enable evidence base to be supplied with any planning application.**

- AOS3 – NGR 564660 274520 – A significant proportion of this site has previously been quarried for limestone clunch. Limited potential for archaeological survival. No objection, and no requirement for archaeological works in connection with the development of this site.
- AOS4 – NGR 564790 274150 – The site is at the margins of known significant archaeology, but Medieval occupation evidence found in Orchard Close 170m to the NW (MCB18441, MCB18442). Two ring ditches are located to the east of the site (MCB27603, MCB27604). SCHEDULED MONUMENT: 19th century limekilns at 350m to NW of this plot. (NHLE 1006871). West half of plot is former limestone (clunch) quarry, eastern half undeveloped. **An archaeological condition is recommended to be placed on any planning consent granted for development of this site.**
- AOS5 – NGR 565030 274370 – Two ring ditches of probable Bronze Age date are located to the south of the site (MCB27603, MCB27604). Medieval finds recorded immediately north (MCB19752, MCB19721) and Saxon, medieval and pot-medieval remains have been excavated at Houghtons Lane to the NE (MCB25469, MCB27643, MCB26822). **Requires pre-determination fieldwork to enable evidence base to be supplied with any planning application.**

- 5.58. The effects on heritage assets will generally depend on the design of the scheme, and therefore all alternative site options are scored *neutral / no effect* in the SEA Framework. However, mitigation is required in respect of non-designated assets of archaeological importance where advised by Cambridgeshire County Council's Historic Environment Team.

SA Objective 3.2 Maintain and enhance the diversity and distinctiveness of landscape and townscape character

- 5.59. The effects of the development of the alternative site options on landscape/townscape character, settlement character and open spaces will depend on the design of the development scheme. Policies within the Development Plan and emerging INP seek to protect and enhance landscape and townscape character. Therefore, all site options are scored *neutral / no effect*.

SA Objective 3.3 Create places, spaces and buildings that work well, wear well and look good

- 5.60. The satisfaction of people with their neighbourhood and standard of design will depend on the design of the development scheme. Policies within the Development Plan and emerging INP seek to deliver high quality design, and building standards are set out in building regulations. All alternative site options are scored *neutral / no effect* in the SEA Framework.

SA Objective 4.1 Reduce emissions of greenhouse gasses and other pollutants (including air, water, soil, noise, vibration and light)

- 5.61. All alternative site options adjoins the built area of Isleham and is accessible to some village services within a reasonable walking distance.
- 5.62. Isleham has a relatively limited range of services and employment opportunities, requiring travel to meet many day-to-day needs. Public transport is limited. Development would likely be car-dependent. Consequently, all sites are scored negatively in respect of this objective in the

SEA Framework. The negative impacts could be avoided through the option to not allocate a site.

- 5.63. No alternative site is within an AQMA or monitored in terms of air quality objectives. As each site will be relatively car-dependent, it may lead to an increase in traffic.
- 5.64. Site ISL7 partly intersects SPZs 1& 3 and is therefore vulnerable to water pollution. However, as previously discussed, the potential for the site to give rise to pollutants will depend on how water and drainage is managed on site.
- 5.65. No site is expected to give rise to excessive noise or light pollution. Reductions in noise and light pollution could be achieved through the design of the scheme.

SA Objective 4.2 Minimise waste production and support the recycling of waste products

- 5.66. Development of any alternative site option is not expected to have a measurable effect in respect of the objective, and therefore all sites are scored *neutral / no effect*.

SA Objective 4.3 Limit or reduce vulnerability to the effects of climate change (including flooding)

- 5.67. All sites are located in Flood Zone 1 and is therefore at lowest risk from flooding. For most alternative site options, surface water flood risk is low or none. However, a significant portion of AOS3 is at risk of surface water flooding, and therefore is scored as *potential adverse impacts* in the SEA Framework.
- 5.68. The thermal qualities of buildings will be determined by building regulations and the design of the development scheme. Development of the site is unlikely to have measurable effects in terms of reducing waste.
- 5.69. Development of all site options is likely to be relatively car dependent as Isleham offers only a limited range of services, education and employment opportunities. Public transport is limited. Therefore all site options are not likely to reduce carbon footprint and are scored negatively in the SEA Framework. This adverse impact could be avoided through not allocating a site.

SA Objective 4.4 Environment

- 5.70. For all site options, effects on local landscape/townscape, local environmental quality, and the extent to which the site will achieve high quality design will depend on the design of the development scheme and other policies in the development plan. Therefore all site options are scored *neutral / no effect* in the SEA Framework.
- 5.71. There is potential for proposed site ISL7 and AOS1 to affect a 'key view' identified by INP, and therefore specific design and mitigation requirements may be required to avoid harm.

SA Objective 5.1 Maintain and enhance human health

- 5.72. Isleham offers recreation facilities and public rights of way. Some day-to-day needs can be met within walking distance of the site. Therefore, the all site options are scored positively.

SA Objective 5.2 Reduce and prevent crime, and reduce the fear of crime

- 5.73. Development of any alternative site option is not expected to have a measurable impact on levels of crime or fear of crime.

SA Objective 5.3 Improve the quantity and quality of publicly accessible open space

- 5.74. The Local Plan requires new developments to contribute to the provision of open space, sport and recreation facilities. All site options are scored positively in respect of the objective, with the exception of the option to not allocate a site.

SA Objective 6.1 Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities)

- 5.75. All site options adjoin the built area of Isleham village and are within walking distance of local services and facilities. Through increasing the population, development of the site could provide additional footfall for community facilities and public transport. The site adjoins Isleham's Conservation Area and therefore will have good access to the historic environment. All alternative site options are therefore scored positively.

SA Objective 6.2 Redress inequalities related to age, gender, disability, race, faith, location and income

- 5.76. The development of any alternative site option will provide a supply of new homes in the village. Policies in the Development Plan require a portion of new homes to be affordable, thereby improving interaction between people of different backgrounds or groups. Therefore all site options are likely to have positive impacts in respect of the objective.
- 5.77. The INP states that proposed site allocation ISL7 is in the ownership of a local almshouse charity and 'we are confident that this site could be developed with both sensitivity and reflecting the need to prioritise the development of shared ownership / affordable properties'.
- 5.78. Consequently, site ISL7 is scored more favourably in the SEA Framework, with *potentially significant beneficial impacts*.
- 5.79. Conversely, the option to *not* allocate a site is scored *neutral / no impact* since no new development would be delivered.

SA Objective 6.3 Ensure all groups have access to decent, appropriate and affordable housing

- 5.80. Policies within the current Development Plan and draft INP require new developments to provide a mix of house types and sizes. New homes will be built to modern building regulations and will therefore increase the supply of quality homes. Therefore all development site options were scored positively.

SA Objective 6.4 Encourage and enable the active involvement of local people in community activities

- 5.81. The INP has been prepared to reflect the views and aspirations of local people. Site ISL7 is proposed for allocation by the INP, and therefore (it is reasonable to assume) reflects the views and aspirations of the community. Allocation of the site will enable this aspiration to be delivered. The ISL7 is expected to deliver *strong and significant beneficial impacts* in the context of the SA objective.
- 5.82. Conversely, there is no indication in the INP that there is a community aspiration to deliver any of the alternative site options, and therefore these would have no effect in respect of the objective.
- 5.83. If no site were allocated, this would undermine the community's power to plan for the growth of their local area – the fundamental purpose of neighbourhood planning. Consequently, the option to omit the site allocation is scored as having a *strong and significant adverse impact* on the objective.

SA Objective 7.1 Help people gain access to satisfying work appropriate to their skills, potential and place of residence

- 5.84. It is assumed that all alternative site options would be for housing development and therefore are unlikely to directly generate employment or business opportunities.
- 5.85. Residents of the site options would likely need to travel by car to access employment. New homes could bring workers to the rural area. However, in the context of the SEA Framework, the impacts are considered *neutral / no effect* for all site options.

SA Objective 7.2 Support appropriate investment in people, places, communications and other infrastructure

- 5.86. The Development Plan requires new development to contribute to the provision of infrastructure and facilities. In addition, the INP identifies priority infrastructure which will be funded through the neighbourhood portion of CIL. Since all new development will provide investment and contribute to the provision of infrastructure all site options are scored positively, with the exception of omitting the site allocation which is not expected to generate investment.
- 5.87. Cambridgeshire County Council's *Education Organisation Plan 2021-22*³⁸ indicates that capacity of primary school places is constrained:
- In recent years, several developments have come forward in Isleham. One sizeable development has been approved and if any more obtain planning permission, it is likely that additional places will be required. The existing school, Isleham CE Primary School, is on a restricted site therefore the Council has recently undertaken a feasibility study to explore the options for providing these places, with a new site identified elsewhere in the village should the school need to relocate to expand.*³⁹
- 5.88. It is therefore critical that any new major residential development makes provision for additional primary school places within Isleham.

SA Objective 7.3 Improve the efficiency, competitiveness, vitality and adaptability of the local economy

- 5.89. Located in Isleham in East Cambridgeshire's rural area, the alternative site options could bring workers to the rural area. With the exception of day-to-day convenience retail, residents of the site would likely need to travel by car to access retail.
- 5.90. Since the alternative site options are for housing development, the site is not expected to contribute to sustainable tourism.

Summary of appraisal of Alternative Site Options against SEA Framework

- 5.91. In summary, the areas of search for alternative site options were identified in the initial assessment as relatively unconstrained parcels of land adjoining Isleham's built area.
- 5.92. Due to the relatively few constraints and similar characteristics of the sites, there was great similarity in terms of the overall scoring through the SEA framework for each alternative site option. For example, all sites were greenfield and in reasonable proximity of village services i.e. within walking distance. Whilst there were minor differences between sites, for example one site may be closer to village services than another, this was generally not considered significant for the purposes of SEA.
- 5.93. For many objectives, sites scored similarly by virtue of being located in Isleham. For example, whilst Isleham offers a range of local services and facilities, all sites are likely to be highly dependent on private motor vehicles. Many residents would need to travel to higher order centres in the district, such as Soham, Ely or regional centres such as Cambridge, to meet their day-to-day needs. For example, to access employment, higher or further education, supermarkets, sports facilities, leisure and entertainment, etc. Reliance on private motor vehicle contributes to a host of sustainability issues, such as release of carbon emissions, degradation of air quality, depletion of fossil fuel resources, traffic congestion, need for costly infrastructure, and isolation for those unable to access or use a vehicle.

³⁸ <https://www.cambridgeshire.gov.uk/asset-library/education-organisation-plan-2021-222.pdf>

³⁹ P34, Education Organisation Plan 2021-22, Cambridgeshire County Council

Environmental constraints

- 5.94. Development of any alternative site option would result in the loss of good quality agricultural land, and have the potential to increase emissions from private motor vehicles. All sites have the potential to increase recreational pressure on designated habitats.
- 5.95. The baseline data and SEA Framework indicate that proposed site allocation ISL7 partly intersects Source Protection Zones 1 and 3. This issue was addressed by the Environment Agency in their response to the Scoping Report consultation.
- 5.96. In addition, a significant portion of AOS3 is at risk from surface water flooding. In the context of the national policy's sequential test, other alternative sites are likely sequentially preferable.
- 5.97. The initial screening assessment identified the potential for recreational disturbance on locally and nationally/internationally designated habitats. Mitigation of such effects was raised by Natural England in its response to the Scoping Report consultation.
- 5.98. No direct harm on the historic environment is identified through the SEA Framework. However, all site options are in proximity of heritage assets and therefore have the potential for adverse impacts.
- 5.99. Potential environmental impacts can generally be avoided through the option which omits the proposed site allocation, since no development would mean no potential for harm.

Social factors

- 5.100. Residential development of all alternative site options would boost the supply of new homes in Isleham. Omitting the site allocation policy would fail to meet housing needs.
- 5.101. The INP indicates that proposed site allocation ISL7 would likely provide a high proportion of affordable homes as the site is controlled by a local almshouse charity. Consequently, ISL7 has greater potential to redress inequalities in terms of access to housing than other alternative sites.
- 5.102. SA objective 6.4 seeks to '*Encourage and enable the active involvement of local people in community activities*'. Through allocation of ISL7, the INP seeks to deliver a community aspiration for development of the site and directly enables local people to shape their local area through the neighbourhood planning process.
- 5.103. Allocation of an alternative site, or to omit the allocation altogether, would fail to deliver this community aspiration and would conflict with the objective.
- 5.104. Primary school places in Isleham are, at present, limited. It is likely that additional primary school places will be required to meet the needs of growth.

Summary of mitigation measures

- 5.105. The SEA Scoping Report provided details of the proposed site allocation and reasonable alternative areas of search and policy options. The statutory bodies had opportunity to comment on these alternatives during consultation on the Scoping Report.

Recreational pressure on habitats

- 5.106. In their response, Natural England identified that all site options in Isleham have the potential to increase recreational pressure on designated sites. For the avoidance of doubt, Natural England indicated through its scoping report consultation response that it generally supports the 'no significant effects' findings of this report in relation to the effects on habitats. Reflecting Natural England's comments, it is therefore recommended that, irrespective of the site option selected, the site allocation policy includes the following policy requirement to mitigate potential impacts on designated nature conservation sites:

Development proposals should undertake an ecological assessment which considers the effects of increased recreational pressure on sensitive sites designated for nature conservation.

- 5.107. The SEA Framework, informed by the initial screening assessment and baseline data collection, ruled out direct urbanising effects from all alternative site options on County Wildlife Sites, since there are no County Wildlife Sites in close proximity of the sites. However, the initial screening assessment was unable to rule out recreational disturbance on County Wildlife Sites. It is expected that the suggested policy requirement would mitigate potential impacts on County Wildlife Sites in addition to European sites.
- 5.108. No alternative site option is expected to impact upon SSSIs, since Natural England's SSSI IRZs confirm there is no consultation requirement for major residential development of the scale envisaged.

Groundwater resources – site ISL7

- 5.109. In its consultation response, Environment Agency confirmed it would likely to object to activities that could damage or diminish groundwater resources. Certain development proposals within an SPZ1 (inner protection zone), or the protection zone of a private potable groundwater supply will result in an 'Objection in Principle' under the Environment Agency's Groundwater Protection Policy. Environment Agency confirmed that major residential development would not necessarily warrant such an objection.
- 5.110. Proposed site allocation ISL7 partially intersects Source Protection Zone 1 and 3. Through the consultation response, the Environment Agency identified the following mitigation measures, which are relevant to proposed site allocation ISL7 only:
- ***The Environment Agency's groundwater protection hierarchy should be incorporated into plans and when proposing new development.***
 - ***Proposals for new development or redevelopment should promote sustainable design, incorporate mitigation measures, account for climate change, and protect and enhance the water environment.***
 - ***An assessment of contamination should be undertaken in line with Land Contamination Risk Management (LCRM) guidance and undertaken by suitably competent persons. Development proposals should only be permitted where it is demonstrated that any identified contamination is capable of being appropriately remediated or rendered innocuous to make the site suitable for the proposed end use.***
 - ***The developer should address risks to controlled waters from contamination following the requirements of the National Planning Policy Framework and the Environment Agency Guiding Principles for Land Contamination.***
 - ***The development should support the Government's expectation that SuDS be provided in new developments. Infiltration SuDS need to meet the criteria in Groundwater Protection Position Statements G1 and G9 to G13.***
- 5.111. Through applying the measures recommended by the statutory consultation bodies, it is reasonable to conclude that the most significant potential adverse impacts of growth can be appropriately mitigated.
- 5.112. All site options have some potential for environmental harm, particularly though the loss of grade 2 agricultural land and reliance on private motor vehicles. However, the option to *not*

allocate a site, whilst would not give rise to environmental harm, is likely outweighed by the need to encourage and enable the involvement of local people in community activities and decision-making and the objective to meet housing needs.

- 5.113. Area of search 3 - *Land north of The Causeway, south of Sun Street* is unlikely to be sequentially preferable in the context of national planning policies to mitigate flood risk. Further investigation through a flood risk assessment would be required to determine the suitability of the site.

Effects on historic environment

- 5.114. Proposed site allocation IS7 and AOS2 adjoin Isleham's Conservation Area. All alternative site options are in proximity of heritage assets. There are no designated heritage assets within the boundary of any site option. However, a number of non-designated heritage assets of archaeological importance are identified in proximity of certain alternative site options. During the course of this assessment Cambridgeshire County Council's Historic Environment Team provided archaeological advice which indicated that development of sites within AOS1, AOS2 and AOS5 would require pre-determination fieldwork to enable evidence base to be supplied with any planning application. Development at AOS4 would require an archaeological condition which is recommended to be placed on any planning consent granted for development of this site.
- 5.115. The presence of heritage assets is not in itself a barrier to growth. However, to be sustainable development must conserve, sustain and enhance the historic environment.
- 5.116. No direct impacts on the historic environment are identified in the SEA Framework. However, the potential effects of development of the alternative site options on the historic environment will depend on the design of the scheme. Therefore, to avoid potential adverse impacts on the historic environment, the INP should include site-specific requirements for the conservation of the historic environment. For example, the following site-specific policy requirements have been informed by the assessment and through consultation with Historic England and Cambridgeshire Council's Historic Environment Team, and would be applicable to various alternative site options:

The design of the scheme should respond appropriately to Isleham's rich historic environment and be informed by a Heritage Statement which, as a minimum, should:

- **identify the relationship of the site to heritage assets;**
- **describe the significance of the heritage assets affected by the proposed development, including where appropriate the contribution made by the development site to their setting;**
- **quantify the impact of the development on the significance of the heritage asset; and**
- **recommend and justify the mitigation measures that should be taken in designing the scheme to avoid or limit harm to heritage assets owing to development within their settings.**

Proposals for development of the site must be accompanied by pre-determination archaeological fieldwork. [Applies to AOS1, AOS2, AOS5 only]

An archaeological condition will be imposed on any planning consent granted for development of this site. [Applies to AOS4 only].

- 5.117. During consultation on the Scoping Report, Historic England provided advice on addressing the potential effects of growth.

- 5.118. Historic England recommends the neighbourhood plan group apply its *Advice Note 3: Site Allocations and Local Plans*, which sets out a robust process for assessing the potential impact of site allocations on any relevant heritage assets. In particular Historic England highlight the Site Selection Methodology and expect a proportionate assessment based on this methodology to be undertaken for any site allocation where there was a potential impact, either positive or negative, on a heritage asset, and the SEA consequently to advise on how any harm should be minimised or mitigated.
- 5.119. Historic England advises that neighbourhood plan group work closely with the conservation and archaeological staff of the relevant local planning authorities throughout the preparation of the plan and its assessment, and the HER at Cambridgeshire County Council be consulted.
- 5.120. Historic England recommend that the SEA process identify any gaps in evidence, including the lack of Conservation Area appraisal for Isleham. The preparation of a Conservation Area appraisal is outside the scope of neighbourhood planning, and is a matter for ECDC to review.

Effects on Education Infrastructure

- 5.121. Available primary school places in Isleham are limited. To accommodate growth (irrespective of which alternative site option) it is likely that all new developments will require the provision of additional primary school places. The following site-specific policy should be incorporated into the INP:

To accommodate the likely increase in demand for school places, development proposals should contribute to the expansion or re-location of Isleham primary school.

Evaluation conclusions

- 5.122. Through the assessment of alternative site options against the SA Objectives in the SEA Framework, all site options likely have the potential to deliver sustainable growth.
- 5.123. The nature of the SEA Framework is a relatively high-level strategic tool. Further investigation of site-specific requirements would be required through preparation of the INP and at the planning application stage.
- 5.124. To ensure growth is sustainable it is essential that new development is supported by investment in infrastructure, notably through the provision of additional school places.

Monitoring indicators

- 5.125. The purpose of monitoring is to identify adverse effects and enable appropriate remedial action following the plan's implementation. The main sustainability concerns identified through the SEA are the potential for impacts upon designated habitats, groundwater resources, designated heritage assets.
- 5.126. By applying the recommended mitigation measures, it is not anticipated that adverse impacts will arise. However, to monitor the effects of implementation of the INP ECDC recommends that Isleham Parish Council use the relevant indicators and targets, set out in Table 9.

TABLE 9: MONITORING INDICATORS

Indicator	Target	Data source
Condition of designated sites	<p>All of the following sites to achieve 'favourable' or 'unfavourable – recovering' condition:</p> <ul style="list-style-type: none"> • Breckland SPA / SAC • Fenland (Chippenham Fen) SAC / Ramsar • Devils Dyke SAC • Fenland (Wicken Fen) SAC / Ramsar • Norfolk Valley Fens SAC • Ouse Washes SPA / SAC / Ramsar • Rex Graham Reserve SAC 	Natural England's Designated Sites View database, available at: https://designatedsites.naturalengland.org.uk/sitelist.aspx
Quantitative and chemical status of groundwater	Achieve 'good' status for both quantitative and chemical status.	Objectives data for South Level and Cut-Off Channel Operational Catchment, available at: https://environment.data.gov.uk/attachment-planning/OperationalCatchment/3414/objectives
Number of designated heritage assets in the Neighbourhood Area	No net reduction in the number of designated historic assets in the Neighbourhood Area.	National Heritage List for England, available at: https://historicengland.org.uk/listing/the-list/
Availability of school places	Maintain sufficient capacity of school places in Isleham	Annual 0-19 Education Organisation Plan, available at: https://www.cambridgeshire.gov.uk/residents/working-together-children-families-and-adults/strategies-policies-and-plans/strategies-for-schools-and-learning

5.127. Performance against the indicators should be regularly monitored, and where targets are not hit, this may trigger the need to review the INP.

6. Non-Technical Summary

Context

- 6.1. The subject of the Environmental Report is the draft Isleham Neighbourhood Plan (INP), which was published for consultation from June to September 2021⁴⁰. The plan has been prepared by Isleham Parish Council with the support of local volunteers. This Environmental Report documents the Strategic Environmental Assessment (SEA) of the draft INP and will inform the continued preparation of the plan. It is expected to be submitted alongside the INP prior to the independent examination of the neighbourhood plan.
- 6.2. SEA is a crucial part of preparing a neighbourhood plan and is essential in demonstrating the plan meets the basic conditions⁴¹ and other statutory requirements. Whilst SEA originates from a European Directive⁴², the process has been incorporated into UK law⁴³ and remains in force despite the UK's withdrawal from the European Union.

Screening exercise

- 6.3. In June 2021, East Cambridgeshire District Council (ECDC) undertook an initial screening assessment of the INP which concluded the plan requires a full Strategic Environmental Assessment (SEA) – this is commonly referred to as being *screened in*.
- 6.4. ECDC also concluded that the INP is not likely to lead to adverse harm to sites designated for nature conservation through the National Sites Network⁴⁴ or Ramsar Sites. Therefore, a full Habitats Regulations Assessment is not required.

Scope

- 6.5. ECDC's screening assessment findings and scope of the Environmental Report were set out in a *Scoping Report*. The Scoping Report was published for consultation with statutory consultation bodies⁴⁵ between 29 June and 03 August 2021. The responses from the statutory bodies have been taken into consideration in carrying out the SEA.
- 6.6. The methodology⁴⁶ applied in this SEA and the content of this Environmental Report, reflect requirements set out in relevant legislation. This includes key information about the Neighbourhood Plan and Neighbourhood Area including an outline of the content and objectives of the INP, its relationship with other relevant plans and programmes, and relevant environmental characteristics of the Neighbourhood Area. These are described in Section 3.
- 6.7. Section 4 provides an initial screening assessment of the INP's policies against various SEA themes⁴⁷ to identify the likelihood of significant effects on the environment. This assessment draws on the environmental constraints and characteristics identified in section 3.

⁴⁰ Regulation 14 pre-submission draft consultation

⁴¹ As set out in 8(2) of Schedule 4B of the Town and Country Planning Act 1990.

⁴² Namely, *Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment* (the Strategic Environmental Assessment Directive).

⁴³ As *The Environmental Assessment of Plans and Programmes Regulations 2004* (i.e. the 'SEA Regulations').

⁴⁴ Special Areas of Conservation and Special Protection Areas, formerly part of the Natura 2000 network.

⁴⁵ The consultation bodies are Environment Agency, Historic England, and Natural England.

⁴⁶ Set out in section 2.

⁴⁷ The SEA themes are defined by the SEA Regulations 2004 and include biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage,

6.8. The assessment (at Section 4) identifies the potential for likely significant effects to arise in respect of the development of proposed site allocation ISL7, namely:

- ***Potential effects on County Wildlife Sites within, or in proximity of, the Neighbourhood Area;***
- ***The proposed site allocation intersects a Source Protection Zone, and therefore has the potential to impact upon groundwater resources; and***
- ***The proposed site allocation adjoins Isleham's Conservation Area and is in proximity of non-designated heritage assets of archaeological importance. The effects of development on and the setting of the Conservation Area and non-designated heritage assets are not known at this stage.***

6.9. In addition, through the assessment, it was identified that primary school capacity in Isleham is limited and has influenced decision-making in respect of potential residential development sites in the past.

6.10. A number of the INP's objectives and policies are particularly environmentally conscientious and address environmental issues positively by seeking to improve the quality of new development to reduce its impacts on the environment. The assessment concluded that such policies and objectives, whilst positive, are not likely to constitute 'significant effects' for the purposes of SEA.

Alternative policy options

6.11. The potential effects on the environment identified through the screening assessment relate to the development of the draft INP's proposed site allocation IN7. Therefore, the reasonable alternatives considered in the assessment include various 'areas of search' for alternative site allocations. The following five areas of search were identified as 'reasonable alternatives' to draft site allocation ISL7:

- AOS1 - Land west of Hall Barn Road, south of Cornwell Close
- AOS2 - Woodland south of Aves Close
- AOS3 - Land north of The Causeway, south of Sun Street
- AOS4 - Land north of Beck Road, south of Festival Road
- AOS5 - Land west of Sheldrick's Road

6.12. In addition, a further option of omitting the site allocation from the INP was considered.

SEA Framework

6.13. Section 5 appraises each option against a SEA Framework. The SEA Framework has been reproduced from ECDC's latest Sustainability Appraisal Framework.

Mitigation measures

6.14. The purpose of appraising sites against the SEA Framework is to identify potential impacts of the 'reasonable alternative' policy options in respect of various SA Objectives.

6.15. A number of positive and negative effects were identified in respect of each policy option, and no specific option was identified as being wholly *unsustainable*. Moreover, it is likely that the

including architectural and archaeological heritage; landscape; and the inter-relationship between these issues.

adverse impacts of proposed site allocation ISL7, or Areas of Search 1 to 5, could be appropriately mitigated.

- 6.16. The formulation of mitigation measures was informed through consultation with statutory bodies, and related to potential effects on designated nature conservation sites, groundwater, resources, the historic environment, and availability of school places.
- 6.17. Natural England supported the initial screening assessment's conclusion that significant effects on sites designated for nature conservation are not likely. However, during consultation on the Scoping Report Natural England requested a site-specific policy requirement be included in the INP to avoid recreational disturbance on sites designated for nature conservation.
- 6.18. Environment Agency provided specific advice to mitigate potential adverse impacts on groundwater resources, relating to proposed site allocation ISL7 only.
- 6.19. Following appraisal against the SEA Framework and consultation with statutory bodies, it is recommended that the following mitigation measures be incorporated into the draft INP:

Recommended mitigation measure 1 - Nature conservation sites (all site options)

Development proposals should undertake an ecological assessment which considers the effects of increased recreational pressure on sensitive sites designated for nature conservation.

Recommended mitigation measure 2 - Groundwater resources (SA ISL7 only)

The Environment Agency's groundwater protection hierarchy should be incorporated into plans and when proposing new development.

Proposals for new development or redevelopment should promote sustainable design, incorporate mitigation measures, account for climate change, and protect and enhance the water environment.

An assessment of contamination should be undertaken in line with Land Contamination Risk Management (LCRM) guidance and undertaken by suitably competent persons. Development proposals should only be permitted where it is demonstrated that any identified contamination is capable of being appropriately remediated or rendered innocuous to make the site suitable for the proposed end use.

The developer should address risks to controlled waters from contamination following the requirements of the National Planning Policy Framework and the Environment Agency Guiding Principles for Land Contamination.

The development should support the Government's expectation that SuDS be provided in new developments. Infiltration SuDS need to meet the criteria in Groundwater Protection Position Statements G1 and G9 to G13.

Recommended mitigation measure 3 – Historic environment (dependent on site option)

The design of the scheme should respond appropriately to Isleham's rich historic environment and be informed by a Heritage Statement which, as a minimum, should:

- **identify the relationship of the site to heritage assets;**
- **describe the significance of the heritage assets affected by the proposed development, including where appropriate the contribution made by the development site to their setting;**
- **quantify the impact of the development on the significance of the heritage asset;**

and

- **recommend and justify the mitigation measures that should be taken in designing the scheme to avoid or limit harm to heritage assets owing to development within their settings.**

Proposals for development of the site must be accompanied by pre-determination archaeological fieldwork. [*Applies to AOS1, AOS2, AOS5 only*]

An archaeological condition will be imposed on any planning consent granted for development of this site [*Applies to AOS4 only*].

Recommended mitigation measure 4 – Community infrastructure (all site options)

To accommodate the likely increase in demand for school places, development proposals should contribute to the expansion or re-location of Isleham primary school.

Monitoring

- 6.20. The purpose of monitoring is to identify adverse effects and enable appropriate remedial action following the plan's implementation. ECDC recommends that Isleham Parish Council monitor the implementation of the INP using the following relevant indicators and targets:

Indicator	Target	Data source
Condition of designated sites	<p>All of the following sites to achieve 'favourable' or 'unfavourable – recovering' condition:</p> <ul style="list-style-type: none"> • Breckland SPA / SAC • Fenland (Chippenham Fen) SAC / Ramsar • Devils Dyke SAC • Fenland (Wicken Fen) SAC / Ramsar • Norfolk Valley Fens SAC • Ouse Washes SPA / SAC / Ramsar • Rex Graham Reserve SAC 	<p>Natural England's Designated Sites View database, available at: https://designatedsites.naturalengland.org.uk/sitelist.aspx</p>
Quantitative and chemical status of groundwater	Achieve 'good' status for both quantitative and chemical status.	<p>Objectives data for South Level and Cut-Off Channel Operational Catchment, available at: https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3414/objectives</p>
Number of designated heritage assets in the Neighbourhood Area	No net reduction in the number of designated historic assets in the Neighbourhood Area.	<p>National Heritage List for England, available at: https://historicengland.org.uk/listing/the-list/</p>

Availability of school places	Maintain sufficient capacity of school places in Isleham	Annual 0-19 Education Organisation Plan, available at: https://www.cambridgeshire.gov.uk/residents/working-together-children-families-and-adults/strategies-policies-and-plans/strategies-for-schools-and-learning
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Conclusions

- 6.21. The assessment has concluded that as currently drafted, the INP could lead to significant effects on the environment. However, ECDC is satisfied that, subject to incorporating the measures recommended in this Environmental Report, such effects can be adequately mitigated or avoided.
- 6.22. Consequently, the INP, where modified to reflect the recommendations of this Environmental Report, is not expected to give rise to significant effects on the environment.

Appendix 1: Statutory Consultation Bodies Responses to Scoping Report Consultation

Environment Agency

Thank you for consulting us on the Scoping Report. The scope of the SEA is generally acceptable and we have general comments to make.

- The proposed site allocation (ISL7) is located within Flood Zone 1. However, the site is located above a Principal Aquifer and within Source Protection Zone 1 (SPZ).
- Reasonable alternative sites located within Areas of Search 1-5: All the five sites are within Flood Zone 1 and located above Principal Aquifer.

We encourage planners, developers and operators to incorporate the Environment Agency's groundwater protection hierarchy in their plans and when proposing new development. Proposals for new development or redevelopment should promote sustainable design, incorporate mitigation measures, account for climate change, and protect and enhance the water environment. The assessment of contamination should be in line with Land Contamination Risk Management (LCRM) guidance and undertaken by suitably competent persons. Overall, developers should demonstrate the following:

- assessment of contamination where suspected;
- prioritisation of brownfield/contaminated sites to bring back into use;
- encourage the use of Sustainable Drainage Systems (SuDS), provided that they are appropriate for their location, suitable management and maintenance measures can be put in place, as they can also be of benefit for nature conservation;
- encourage pre-application discussions with the Local Planning Authority, relevant pollution control authority and stakeholders with a legitimate interest (i.e. drainage and Lead Local Flood Authority);
- Preliminary Risk Assessment (PRA) to be undertaken as a first stage of assessment of risk and be a requirement for validating planning applications;
- all investigations to be carried out in accordance with LCRM (which requires a risk based approach and remediation options appraisal) and the council's Supplementary Planning Document (SPD) if it were to be produced;
- assessment of potential impact to natural water resources from dewatering activities during development works; and
- minimising the use of landfill and encouraging re-use of waste where appropriate.

Development proposals should only be permitted where it is demonstrated that any identified contamination is capable of being appropriately remediated or rendered innocuous to make the site suitable for the proposed end use. Pre-application discussions should be encouraged to identify and deal with issues at an early stage; this will allow for careful consideration and decision making and allow for better communication and relationship between developers and regulatory bodies.

Planners and developers should be aware that we are likely to object to certain activities that could damage or diminish groundwater resources. Certain development proposals within an SPZ1 (inner protection zone), or the protection zone of a private potable groundwater supply will result in an 'Objection in Principle' under the Environment Agency's Groundwater Protection Policy. As such, we would recommend that groundwater SPZ1 (inner protection zones) be added to environmental constraints study. Development proposals within an SPZ2 or 3, or on a principal or secondary aquifer will be considered on a risk based approach with the exception of developments involving deep soakaways, sewerage, trade and storm effluent to ground which will only be supported where

it can be demonstrated that these are necessary, are the only option available and where adequate safeguards against possible contamination can be agreed, implemented and maintained.

The developer should address risks to controlled waters from contamination following the requirements of the National Planning Policy Framework and the Environment Agency Guiding Principles for Land Contamination, which can be found here:

<https://www.gov.uk/government/publications/managing-and-reducing-land-contamination>

Surface Water Drainage

The Environment Agency supports the Government's expectation that SuDS be provided in new developments wherever this is appropriate. Infiltration SuDS need to meet the criteria in our Groundwater Protection Position Statements G1 and G9 to G13, however, and must not be constructed in contaminated ground where they could cause the remobilisation of contaminants into controlled waters receptors. We would expect any SuDS to have mitigation measures in place to allow for treatment of and reduction in contaminant levels in the surface water run-off. Deep infiltration SuDS (greater than 2.0m below ground level) are generally not acceptable in areas where groundwater constitutes a significant resource. All infiltration SuDS require a minimum of 1.2m clearance between the base of infiltration SuDS and peak seasonal groundwater levels.

We hope that this information is of assistance to you. If you have any further queries please do not hesitate to contact us.

Yours sincerely

Elizabeth Mugova

Sustainable Places Planning Advisor

Direct e-mail planning.brampton@environment-agency.gov.uk

Historic England

Thank you for your email requesting a scoping opinion for the Isleham Neighbourhood Plan SEA. We welcome this early opportunity to review the Scoping Report.

We would refer you to the advice in *Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment*, which can be found here:

<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>. This advice sets out the historic environment factors which need to be considered during the Strategic Environmental Assessment or Sustainability Appraisal process, and our recommendations for information you should include.

We would also refer you to *Historic England Advice Note 3: Site Allocations and Local Plans*. This advice note sets out what we consider to be a robust process for assessing the potential impact of site allocations on any relevant heritage assets. In particular we would highlight the Site Selection Methodology set out on Page 5. This is similar to the methodology used to assess potential impacts on the setting of heritage assets (Good Practice Advice 3) but is focused specifically on the site allocation process.

We would expect a proportionate assessment based on this methodology to be undertaken for any site allocation where there was a potential impact, either positive or negative, on a heritage asset, and the SEA consequently to advise on how any harm should be minimised or mitigated. Advice Note 3 can be found here: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

We are pleased to note that the Scoping Report identifies a comprehensive historic environment evidence base, and note that it sets out the positive and welcome approach that the Neighbourhood Plan's policies takes towards the conservation of the historic environment. However, the Scoping Report should also identify where there are gaps in evidence, for example the lack of conservation area appraisal for Isleham, and make recommendations for how these gaps are to be mitigated when undertaking the SEA.

We are pleased to note that the Cambridgeshire HER is referred to, but would note that the Heritage Gateway website is not an appropriate source of Historic Environment Record (HER) data, as it is not updated on a regular enough basis. The HER at Cambridgeshire County Council should be consulted directly. This may be free of charge for neighbourhood plan groups.

In general, Historic England strongly advises that the conservation and archaeological staff of the relevant local planning authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the in the HER mentioned above which should be consulted as part of the SEA process. In addition, they will be able to advise how any site allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SEA, these would have an adverse effect upon the environment.

Yours sincerely,

Edward James

Historic Places Advisor, East of England

Edward.James@HistoricEngland.org.uk

Natural England

Thank you for your consultation on the above in your email of 29 June 2021.

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.

The Strategic Environmental Assessment Scoping Report incorporating Habitats Regulations Assessment (East Cambridgeshire District Council, 28 June 2021) considers the implications of the Isleham Neighbourhood Plan (INP) on relevant aspects of the natural environment including statutorily protected sites, wider biodiversity, local landscape and soils, including the important peat resource. Natural England generally supports the no significant effects findings of the report in relation to these matters. Whilst proposed development through the INP will avoid the extensive peat resource the Plan should recognise its important role as a carbon sink, helping to reduce and mitigate climate change and deliver other ecosystem services and biodiversity enhancement opportunities as part of the Nature Recovery Network (NRN). National Habitats Network mapping is available to view at www.magic.defra.gov.uk.

The HRA of the now withdrawn East Cambridgeshire Local Plan Review included the following recommendation for Policy Isleham4:

Isleham4: should include the requirement for an ecological assessment that should consider the effects of increased recreational pressure on N2K sites.

We supported this recommendation and advised that the requirement be included in the relevant plan policy. Our advice is that this requirement should be carried forward into those policies in the INP promoting housing development. Addressing this through the revised Scoping Report and the draft SBNP will strengthen the no significant environmental effect conclusion of the report. New housing development incorporating high quality open space, including biodiversity-rich habitats and circular dog-walking routes, can help to reduce additional pressure on more sensitive designated sites.

Section 4.73 of the Scoping Report identifies that INP Policy 7: Wildlife & Habitats requires development proposals to contribute to meeting the government's 25-year plan for the environment by enhancing connectivity, avoiding loss of wildlife habitats or natural features and encouraging proposals to provide an overall net gain in biodiversity. This is welcomed by Natural England and we suggest that Policy 7 could link these requirements to an objective to contribute towards delivery of the NRN, referenced above, and Natural Cambridgeshire's 'doubling nature' targets.

I hope you will find our comments helpful. For any correspondence or queries relating to this consultation only, please contact Janet Nuttall On 020 802 65894.

For all new consultations, please contact consultations@naturalengland.org.uk

Yours sincerely

Janet Nuttall Sustainable Land User Adviser

Appendix 2: SEA Framework – Alternative Site Options

SA topic	SA Objective	Key Questions	SA ISL7	AOS1	AOS2	AOS3	AOS4	AOS5	No site allocation (omit site policy)
1 Land and water resources	1.1 Minimise the irreversible loss of undeveloped land and productive agricultural holdings	Will it optimise the use of previously developed land, buildings and existing infrastructure?	-	-	-	-	-	-	~
		<p>Will it use land efficiently?</p> <p>Will it protect and enhance the best and most versatile agricultural land?</p>	<p>Site is greenfield and is not previously developed land. The site adjoins the built area and therefore could utilise existing infrastructure.</p> <p>The extent to which the site makes efficient use of land will depend on the layout and design of the development scheme, and policies within the Development Plan and emerging INP.</p> <p>The site is located on Grade 2 agricultural land. Development of the site would therefore lead to the loss of good quality agricultural land.</p>	<p>Site is greenfield and is not previously developed land. The site adjoins the built area and therefore could utilise existing infrastructure.</p> <p>The extent to which the site makes efficient use of land will depend on the layout and design of the development scheme and policies within the Development Plan and emerging INP.</p> <p>The site is located on Grade 2 agricultural land. Development of the site would therefore lead to the loss of good quality agricultural land.</p>	<p>Site is greenfield and is not previously developed land. The site adjoins the built area and therefore could utilise existing infrastructure.</p> <p>The extent to which the site makes efficient use of land will depend on the layout and design of the development scheme and policies within the Development Plan and emerging INP.</p> <p>The site is located on Grade 2 agricultural land. Development of the site would therefore lead to the loss of good quality agricultural land.</p>	<p>Site is greenfield and is not previously developed land. The site adjoins the built area and therefore could utilise existing infrastructure.</p> <p>The extent to which the site makes efficient use of land will depend on the layout and design of the development scheme and policies within the Development Plan and emerging INP.</p> <p>The site is located on Grade 2 agricultural land. Development of the site would therefore lead to the loss of good quality agricultural land.</p>	<p>Site is greenfield and is not previously developed land. The site adjoins the built area and therefore could utilise existing infrastructure.</p> <p>The extent to which the site makes efficient use of land will depend on the layout and design of the development scheme and policies within the Development Plan and emerging INP.</p> <p>The site is located on Grade 2 agricultural land. Development of the site would therefore lead to the loss of good quality agricultural land.</p>	<p>Site is greenfield and is not previously developed land. The site adjoins the built area and therefore could utilise existing infrastructure.</p> <p>The extent to which the site makes efficient use of land will depend on the layout and design of the development scheme and policies within the Development Plan and emerging INP.</p> <p>The site is located on Grade 2 agricultural land. Development of the site would therefore lead to the loss of good quality agricultural land.</p>	<p>Since no site would be allocated, no land would be 'lost' to development. Therefore, the option would have no effect in respect of the objective.</p>

			-	-	-	-	-	-	~
	1.2 Reduce the use of non-renewable resources including energy sources and increase the use of renewable energy	Will it reduce energy consumption?	<p>The site adjoins the built area of Isleham and is accessible to some village services within a reasonable walking distance.</p> <p>Isleham has a relatively limited range of services and employment opportunities, requiring travel to meet many day-to-day needs. Public transport is limited. Development would likely be car-dependent.</p>	<p>The site adjoins the built area of Isleham and is accessible to some village services within a reasonable walking distance.</p> <p>Isleham has a relatively limited range of services and employment opportunities, requiring travel to meet many day-to-day needs. Public transport is limited. Development would likely be car-dependent.</p>	<p>The site adjoins the built area of Isleham and is accessible to some village services within a reasonable walking distance.</p> <p>Isleham has a relatively limited range of services and employment opportunities, requiring travel to meet many day-to-day needs. Public transport is limited. Development would likely be car-dependent.</p>	<p>The site adjoins the built area of Isleham and is accessible to some village services within a reasonable walking distance.</p> <p>Isleham has a relatively limited range of services and employment opportunities, requiring travel to meet many day-to-day needs. Public transport is limited. Development would likely be car-dependent.</p>	<p>The site adjoins the built area of Isleham and is accessible to some village services within a reasonable walking distance.</p> <p>Isleham has a relatively limited range of services and employment opportunities, requiring travel to meet many day-to-day needs. Public transport is limited. Development would likely be car-dependent.</p>	<p>The site adjoins the built area of Isleham and is accessible to some village services within a reasonable walking distance.</p> <p>Isleham has a relatively limited range of services and employment opportunities, requiring travel to meet many day-to-day needs. Public transport is limited. Development would likely be car-dependent.</p>	<p>By not allocating a site, no development opportunity would be created. Therefore, the option would have no effect in respect of the objective.</p>
		Will it increase the proportion of energy needs being met from renewable sources?	<p>The potential to meet energy needs from renewable sources will depend on the design of the development scheme.</p>	<p>The potential to meet energy needs from renewable sources will depend on the design of the development scheme.</p>	<p>The potential to meet energy needs from renewable sources will depend on the design of the development scheme.</p>	<p>The potential to meet energy needs from renewable sources will depend on the design of the development scheme.</p>	<p>The potential to meet energy needs from renewable sources will depend on the design of the development scheme.</p>	<p>The potential to meet energy needs from renewable sources will depend on the design of the development scheme.</p>	
	1.3 Limit water consumption to levels supportable by natural processes	Will it reduce water consumption?	-	~	~	~	~	~	~
			Water consumption rates for homes are managed through building regulations.	Water consumption rates for homes are managed through building regulations.	Water consumption rates for homes are managed through building regulations.	Water consumption rates for homes are managed through building regulations.	Water consumption rates for homes are managed through building regulations.	Water consumption rates for homes are managed through building regulations.	By not allocating a site, no development opportunity would be created. Therefore, the

	and storage systems	Will it conserve ground water resources?	The southern 'half' of site is within Source Protection Zones 1 & 3.	The site is not within a Source Protection Zone.	The site is not within a Source Protection Zone.	The site is not within a Source Protection Zone.	The site is not within a Source Protection Zone.	The site is not within a Source Protection Zone.	option would have no effect in respect of the objective.
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SA topic	SA Objective	Key Questions	SA ISL7	AOS1	AOS2	AOS3	AOS4	AOS5	No site allocation (omit site policy)
2 Biodiversity	2.1 Avoid damage to designated statutory and non-statutory sites and protected species	Will it protect sites designated for nature conservation interest?	~	~	~	~	~	~	+
			The site is not designated for nature conservation. However, there are designated nature conservation sites in proximity of the site. New development has the potential to increase recreational pressure on habitats.	The site is not designated for nature conservation. However, there are designated nature conservation sites in proximity of the site. New development has the potential to increase recreational pressure on habitats.	The site is not designated for nature conservation. However, there are designated nature conservation sites in proximity of the site. New development has the potential to increase recreational pressure on habitats.	The site is not designated for nature conservation. However, there are designated nature conservation sites in proximity of the site. New development has the potential to increase recreational pressure on habitats.	The site is not designated for nature conservation. However, there are designated nature conservation sites in proximity of the site. New development has the potential to increase recreational pressure on habitats.	The site is not designated for nature conservation. However, there are designated nature conservation sites in proximity of the site. New development has the potential to increase recreational pressure on habitats.	By not allocating a site, no development opportunity would be created. Therefore, the option would avoid damage to designated habitats.

		Will it mitigate against any harm caused by proposed development?	During consultation on the Scoping Report, Natural England recommended the INP's site policy include a requirement for an ecological assessment that should consider the effects of increased recreational pressure on [formerly] N2K sites. Therefore, it is expected that any potential impacts will be adequately mitigated.	During consultation on the Scoping Report, Natural England recommended the INP's site policy include a requirement for an ecological assessment that should consider the effects of increased recreational pressure on [formerly] N2K sites. Therefore, it is expected that any potential impacts will be adequately mitigated.	During consultation on the Scoping Report, Natural England recommended the INP's site policy include a requirement for an ecological assessment that should consider the effects of increased recreational pressure on [formerly] N2K sites. Therefore, it is expected that any potential impacts will be adequately mitigated.	During consultation on the Scoping Report, Natural England recommended the INP's site policy include a requirement for an ecological assessment that should consider the effects of increased recreational pressure on [formerly] N2K sites. Therefore, it is expected that any potential impacts will be adequately mitigated.	During consultation on the Scoping Report, Natural England recommended the INP's site policy include a requirement for an ecological assessment that should consider the effects of increased recreational pressure on [formerly] N2K sites. Therefore, it is expected that any potential impacts will be adequately mitigated.	During consultation on the Scoping Report, Natural England recommended the INP's site policy include a requirement for an ecological assessment that should consider the effects of increased recreational pressure on [formerly] N2K sites. Therefore, it is expected that any potential impacts will be adequately mitigated.	
			Natural England's SSSI IRZs indicate that there is no consultation requirement for a development of the scale envisaged, and therefore effects on SSSIs are not expected to arise.	Natural England's SSSI IRZs indicate that there is no consultation requirement for a development of the scale envisaged, and therefore effects on SSSIs are not expected to arise.	Natural England's SSSI IRZs indicate that there is no consultation requirement for a development of the scale envisaged, and therefore effects on SSSIs are not expected to arise.	Natural England's SSSI IRZs indicate that there is no consultation requirement for a development of the scale envisaged, and therefore effects on SSSIs are not expected to arise.	Natural England's SSSI IRZs indicate that there is no consultation requirement for a development of the scale envisaged, and therefore effects on SSSIs are not expected to arise.	Natural England's SSSI IRZs indicate that there is no consultation requirement for a development of the scale envisaged, and therefore effects on SSSIs are not expected to arise.	
2.2 Maintain and enhance the range and viability of characteristic habitats and species	Will it conserve species, reverse declines, and help to enhance diversity?	~	~	~	~	~	~	~	~
		The site is not designated for nature conservation.	The site is not designated for nature conservation.	The site is not designated for nature conservation.	The site is not designated for nature conservation.	The site is not designated for nature conservation.	The site is not designated for nature conservation.	The site is not designated for nature conservation.	By not allocating a site, no development opportunity would be created.

		Will it reduce habitat fragmentation? Will it help achieve Biodiversity Action Plan targets?	There may be opportunities to provide a biodiversity net gain through the design of the development scheme.	There may be opportunities to provide a biodiversity net gain through the design of the development scheme.	There may be opportunities to provide a biodiversity net gain through the design of the development scheme.	There may be opportunities to provide a biodiversity net gain through the design of the development scheme.	There may be opportunities to provide a biodiversity net gain through the design of the development scheme.	There may be opportunities to provide a biodiversity net gain through the design of the development scheme.	Therefore, the option would have no effect in respect of the objective.
			+	+	+	+	+	+	~
	2.3 Improve opportunities for people to access and appreciate wildlife and wild places	Will it improve access to wildlife, and wild places? Will it maintain or increase the area of high-quality green space? Will it promote understanding and appreciation of wildlife?	Isleham is located in East Cambridgeshire's rural. The site adjoins the village and is surrounded by countryside, which is accessible by rural lanes and Public Rights of Way. In the locality there are numerous sites of nature conservation that are accessible to visitors.	Isleham is located in East Cambridgeshire's rural. The site adjoins the village and is surrounded by countryside, which is accessible by rural lanes and Public Rights of Way. In the locality there are numerous sites of nature conservation that are accessible to visitors.	Isleham is located in East Cambridgeshire's rural. The site adjoins the village and is surrounded by countryside, which is accessible by rural lanes and Public Rights of Way. In the locality there are numerous sites of nature conservation that are accessible to visitors.	Isleham is located in East Cambridgeshire's rural. The site adjoins the village and is surrounded by countryside, which is accessible by rural lanes and Public Rights of Way. In the locality there are numerous sites of nature conservation that are accessible to visitors.	Isleham is located in East Cambridgeshire's rural. The site adjoins the village and is surrounded by countryside, which is accessible by rural lanes and Public Rights of Way. In the locality there are numerous sites of nature conservation that are accessible to visitors.	Isleham is located in East Cambridgeshire's rural. The site adjoins the village and is surrounded by countryside, which is accessible by rural lanes and Public Rights of Way. In the locality there are numerous sites of nature conservation that are accessible to visitors.	By not allocating a site, no development opportunity would be created. Therefore, the option would have no effect in respect of the objective.

SA topic	SA Objective	Key Questions	SA ISL7	AOS1	AOS2	AOS3	AOS4	AOS5	No site allocation (omit site policy)
3 Landscape, townscape and archaeology	3.1 Conserve, sustain and enhance the historic environment including the significance of designated and non-designated heritage assets (and any contribution made to that significance by setting)	Will it protect or enhance sites, features or areas of historical, archaeological, or cultural interest and their settings?	~	~	~	~	~	~	~
			<p>There are no heritage assets on site. However, the site is adjacent to the Conservation Area and there are listed buildings and scheduled monuments in proximity of the site.</p> <p>The effects on heritage assets will generally depend on the design of the scheme.</p> <p>Non-designated asset <i>Undated ditches and post holes (MCB30317)</i> located on-site. However, Historic Environment Team did not provide specific advice relating to effects of site's development.</p>	<p>There are no heritage assets on site. However, the Isleham Conservation Area, listed buildings and scheduled monuments are in proximity of the site.</p> <p>The effects on heritage assets will generally depend on the design of the scheme.</p> <p>No non-designated assets on site. However, Historic Environment Records Team advise that site immediately east of three known ring ditches representing remains of prehistoric barrow burials (MCB17114); a fourth probable ring ditch is also present (MCB31083). Multiple sites of metal detection finds of later prehistoric, Roman and Medieval date</p>	<p>There are no heritage assets on site. However, the site is adjacent to the Conservation Area and there are listed buildings and scheduled monuments in proximity of the site.</p> <p>The effects on heritage assets will generally depend on the design of the scheme.</p> <p>No non-designated assets on site. No non-designated assets on site. However, Historic Environment Records Team advise that site immediately north of Iron Age and Medieval (11th-13th c.) remains, including post-built structures, previously excavated at Isleham Recreation Ground (MCB20069, MCB22685).</p>	<p>There are no heritage assets on site. However, the Isleham Conservation Area, listed buildings and scheduled monuments are in proximity of the site.</p> <p>The effects on heritage assets will generally depend on the design of the scheme.</p> <p>Non-designated asset <i>An area of post medieval quarrying (MCB31149)</i> located on site. Historic Environment Records Team advise that a significant proportion of this site has previously been quarried for limestone clunch. Limited</p>	<p>There are no heritage assets on site. However, the Isleham Conservation Area, listed buildings and scheduled monuments are in proximity of the site.</p> <p>The effects on heritage assets will generally depend on the design of the scheme.</p> <p>Non-designated asset <i>Site of former limestone quarry at Isleham (MCB22019)</i> located on site. Historic Environment Records Team advise the site is at the margins of known significant archaeology, but Medieval occupation evidence found in Orchard Close 170m to the NW</p>	<p>There are no heritage assets on site. However, the Isleham Conservation Area, listed buildings and scheduled monuments are in proximity of the site.</p> <p>The effects on heritage assets will generally depend on the design of the scheme.</p> <p>No non-designated asset located on site. Historic Environment Records Team advise that two ring ditches of probable Bronze Age date are located to the south of the site (MCB27603, MCB27604). Medieval finds recorded immediately north (MCB19752, MCB19721) and Saxon, medieval and pot-medieval remains have been excavated at Houghtons Lane to the NE (MCB25469, MCB27643, MCB26822). Requires pre-</p>	<p>By not allocating a site, no development opportunity would be created. Therefore, the option would have no effect in respect of the objective.</p>

				(eg. 07559, 07559A, MCB16203, 10866) are present to the west. Prehistoric evidence has been excavated immediately opposite the site on the east side of Hall Barn Rd (CB15282), which fieldwork has shown to extend alongside the road to the south (MCB28013). Requires pre-determination fieldwork to enable evidence base to be supplied with any planning application.	Prehistoric remains previously recorded in adjacent plot to west of site (MCB19231). SCHEDULED MONUMENT: Isleham priory at 240m NNW of this plot (NHLE ref 1013278); 19th century limekilns at 180m to NE. (NHLE 1006871). Requires pre-determination fieldwork to enable evidence base to be supplied with any planning application.	potential for archaeological survival. No objection, and no requirement for archaeological works in connection with the development of this site.	(MCB18441, MCB18442). Two ring ditches are located to the east of the site (MCB27603, MCB27604). SCHEDULED MONUMENT: 19th century limekilns at 350m to NW of this plot. (NHLE 1006871). West half of plot is former limestone (clunch) quarry, eastern half undeveloped. An archaeological condition is recommended to be placed on any planning consent granted for development of this site.	determination fieldwork to enable evidence base to be supplied with any planning application.	
	Will it foster heritage-led sustainable tourism?	Site is not likely to affect heritage led sustainable tourism.	Site is not likely to affect heritage led sustainable tourism.	Site is not likely to affect heritage led sustainable tourism.	Site is not likely to affect heritage led sustainable tourism.	Site is not likely to affect heritage led sustainable tourism.	Site is not likely to affect heritage led sustainable tourism.	Site is not likely to affect heritage led sustainable tourism.	
	3.2 Maintain and	~	~	~	~	~	~	~	~

	enhance the diversity and distinctiveness of landscape and townscape character	<p>Will it maintain and enhance the diversity and distinctiveness of landscape and townscape character?</p> <ul style="list-style-type: none"> Will it protect and enhance open spaces of amenity and recreational value? <p>Will it maintain and enhance the character of settlements?</p>	The effects on landscape/townscape character, settlement character and open spaces will depend on the design of the development scheme. Policies within the Development Plan and emerging INP seek to protect and enhance landscape and townscape character.	The effects on landscape/townscape character, settlement character and open spaces will depend on the design of the development scheme. Policies within the Development Plan and emerging INP seek to protect and enhance landscape and townscape character.	The effects on landscape/townscape character, settlement character and open spaces will depend on the design of the development scheme. Policies within the Development Plan and emerging INP seek to protect and enhance landscape and townscape character.	The effects on landscape/townscape character, settlement character and open spaces will depend on the design of the development scheme. Policies within the Development Plan and emerging INP seek to protect and enhance landscape and townscape character.	The effects on landscape/townscape character, settlement character and open spaces will depend on the design of the development scheme. Policies within the Development Plan and emerging INP seek to protect and enhance landscape and townscape character.	The effects on landscape/townscape character, settlement character and open spaces will depend on the design of the development scheme. Policies within the Development Plan and emerging INP seek to protect and enhance landscape and townscape character.	By not allocating a site, no development opportunity would be created. Therefore, the option would have no effect in respect of the objective.
	3.3 Create places, spaces and buildings that work well, wear well and look good	<p>Will it improve the satisfaction of people with their neighbourhoods as places to live?</p> <p>Will it lead to developments built to a high standard of design?</p>	~	~	~	~	~	~	~
			The satisfaction of people with their neighbourhood and standard of design will depend on the design of the development scheme. Policies within the Development Plan and emerging INP seek to deliver high quality design, and building standards are set out in building regulations.	The satisfaction of people with their neighbourhood and standard of design will depend on the design of the development scheme. Policies within the Development Plan and emerging INP seek to deliver high quality design, and building standards are set out in building regulations.	The satisfaction of people with their neighbourhood and standard of design will depend on the design of the development scheme. Policies within the Development Plan and emerging INP seek to deliver high quality design, and building standards are set out in building regulations.	The satisfaction of people with their neighbourhood and standard of design will depend on the design of the development scheme. Policies within the Development Plan and emerging INP seek to deliver high quality design, and building standards are set out in building regulations.	The satisfaction of people with their neighbourhood and standard of design will depend on the design of the development scheme. Policies within the Development Plan and emerging INP seek to deliver high quality design, and building standards are set out in building regulations.	The satisfaction of people with their neighbourhood and standard of design will depend on the design of the development scheme. Policies within the Development Plan and emerging INP seek to deliver high quality design, and building standards are set out in building regulations.	By not allocating a site, no development opportunity would be created. Therefore, the option would have no effect in respect of the objective.

						building standards are set out in building regulations.			
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SA topic	SA Objective	Key Questions	SA ISL7	AOS1	AOS2	AOS3	AOS4	AOS5	No site allocation (omit site policy)
4 Environment and pollution	4.1 Reduce emissions of greenhouse gasses and other pollutants (including air, water, soil, noise, vibration and light)		-	-	-	-	-	-	~
		<p>Will it reduce emissions of greenhouse gases?</p> <p>Will it improve air quality?</p> <p>Will it reduce traffic volumes?</p>	<p>The site adjoins the built area of Isleham and is accessible to some village services within a reasonable walking distance.</p> <p>Isleham has a relatively limited range of services and employment opportunities, requiring travel to meet many day-to-day needs. Public transport is limited. Development would likely be car-dependent.</p> <p>The site is not within an AQMA or monitored in terms of air quality objectives. As the site will be relatively car-dependent, it may</p>	<p>The site adjoins the built area of Isleham and is accessible to some village services within a reasonable walking distance.</p> <p>Isleham has a relatively limited range of services and employment opportunities, requiring travel to meet many day-to-day needs. Public transport is limited. Development would likely be car-dependent.</p> <p>The site is not within an AQMA or monitored in terms of air quality objectives. As the site will be relatively car-dependent, it may</p>	<p>The site adjoins the built area of Isleham and is accessible to some village services within a reasonable walking distance.</p> <p>Isleham has a relatively limited range of services and employment opportunities, requiring travel to meet many day-to-day needs. Public transport is limited. Development would likely be car-dependent.</p> <p>The site is not within an AQMA or monitored in terms of air quality objectives. As the site will be relatively car-dependent, it may</p>	<p>The site adjoins the built area of Isleham and is accessible to some village services within a reasonable walking distance.</p> <p>Isleham has a relatively limited range of services and employment opportunities, requiring travel to meet many day-to-day needs. Public transport is limited. Development would likely be car-dependent.</p> <p>The site is not within an AQMA or monitored in terms of air quality objectives. As the site will be relatively car-dependent, it may</p>	<p>The site adjoins the built area of Isleham and is accessible to some village services within a reasonable walking distance.</p> <p>Isleham has a relatively limited range of services and employment opportunities, requiring travel to meet many day-to-day needs. Public transport is limited. Development would likely be car-dependent.</p> <p>The site is not within an AQMA or monitored in terms of air quality objectives. As the site will be relatively car-dependent, it may</p>	<p>The site adjoins the built area of Isleham and is accessible to some village services within a reasonable walking distance.</p> <p>Isleham has a relatively limited range of services and employment opportunities, requiring travel to meet many day-to-day needs. Public transport is limited. Development would likely be car-dependent.</p> <p>The site is not within an AQMA or monitored in terms of air quality objectives. As the site will be relatively car-dependent, it may</p>	<p>By not allocating a site, no development opportunity would be created. Therefore, the option would have no effect in respect of the objective.</p>

		<p>Will it support travel by means other than the car?</p> <p>Will it reduce levels of noise?</p> <p>Will it reduce or minimise light pollution?</p> <p>Will it reduce water pollution?</p>	<p>lead to an increase in traffic. The site partly intersects SPZs 1& 3 and is therefore vulnerable to water pollution. However, the potential for the site to give rise to pollutants will depend on how water and drainage is managed on site.</p> <p>The site is not expected to excessive give rise to noise or light pollution. Reductions in noise and light pollution could be achieved through the design of the scheme.</p>	<p>lead to an increase in traffic. The site is not in a SPZ. The potential for the site to give rise to pollutants will depend on how water and drainage is managed on site.</p> <p>The site is not expected to excessive give rise to noise or light pollution. Reductions in noise and light pollution could be achieved through the design of the scheme.</p>	<p>lead to an increase in traffic. The site is not in a SPZ. The potential for the site to give rise to pollutants will depend on how water and drainage is managed on site.</p> <p>The site is not expected to excessive give rise to noise or light pollution. Reductions in noise and light pollution could be achieved through the design of the scheme.</p>	<p>lead to an increase in traffic. The site is not in a SPZ. The potential for the site to give rise to pollutants will depend on how water and drainage is managed on site.</p> <p>The site is not expected to excessive give rise to noise or light pollution. Reductions in noise and light pollution could be achieved through the design of the scheme.</p>	<p>lead to an increase in traffic. The site is not in a SPZ. The potential for the site to give rise to pollutants will depend on how water and drainage is managed on site.</p> <p>The site is not expected to excessive give rise to noise or light pollution. Reductions in noise and light pollution could be achieved through the design of the scheme.</p>	
4.2 Minimise waste production and support the recycling of waste products	<p>Will it reduce household waste?</p> <p>Will it increase waste reuse and recycling?</p> <p>Will it reduce waste from other sources?</p>	~	~	~	~	~	~	~
		<p>Development of the site is unlikely to have measurable effects in respect of the objective.</p>	<p>Development of the site is unlikely to have measurable effects in respect of the objective.</p>	<p>Development of the site is unlikely to have measurable effects in respect of the objective.</p>	<p>Development of the site is unlikely to have measurable effects in respect of the objective.</p>	<p>Development of the site is unlikely to have measurable effects in respect of the objective.</p>	<p>Development of the site is unlikely to have measurable effects in respect of the objective.</p>	<p>By not allocating a site, no development opportunity would be created. Therefore, the option would have no effect in respect of the objective.</p>
		-	-	-	--	-	-	~

4.3 Limit or reduce vulnerability to the effects of climate change (including flooding)	Will it minimise risk to people and property from flooding, storm events or subsidence?	The site is located in Flood Zone 1 and is therefore at lowest risk from flooding. No surface water flood risk is identified.	The site is located in Flood Zone 1 and is therefore at lowest risk from flooding. Risk of surface water flooding is minimal, with approx. 1% of the site area at risk from a 1 in 1,000 yr event.	The site is located in Flood Zone 1 and is therefore at lowest risk from flooding. No surface water flood risk is identified.	The site is located in Flood Zone 1 and is therefore at lowest risk from flooding. Risk of surface water flooding is identified, with approx. 6% of the site area at risk from a 1 in 30 yr event, and approx. 23% at risk from a 1 in 1,000 yr event.	The site is located in Flood Zone 1 and is therefore at lowest risk from flooding. Risk of surface water flooding is low, with approx. 1% of the site area at risk from a 1 in 100 yr event, rising to approx. 2% in a 1 in 1,000 yr event.	The site is located in Flood Zone 1 and is therefore at lowest risk from flooding. No significant surface water flood risk is identified (0.06% in 1 in 1,000 yr event).	By not allocating a site, no development opportunity would be created. Therefore, the option would have no effect in respect of the objective.
	Will it improve the adaptability of buildings to changing temperatures?	The thermal qualities of buildings will be determined by building regulations and the design of the development scheme.	The thermal qualities of buildings will be determined by building regulations and the design of the development scheme.	The thermal qualities of buildings will be determined by building regulations and the design of the development scheme.	The thermal qualities of buildings will be determined by building regulations and the design of the development scheme.	The thermal qualities of buildings will be determined by building regulations and the design of the development scheme.	The thermal qualities of buildings will be determined by building regulations and the design of the development scheme.	
	Will it reduce waste from other sources?	Development of the site is unlikely to have measurable effects in respect of the objective.	Development of the site is unlikely to have measurable effect on reducing waste management.	Development of the site is unlikely to have measurable effect on reducing waste management.	Development of the site is unlikely to have measurable effect on reducing waste management.	Development of the site is unlikely to have measurable effect on reducing waste management.	Development of the site is unlikely to have measurable effect on reducing waste management.	
	Will it reduce carbon footprint?	Development on the site is likely to be relatively car dependent as Isleham offers only a limited range of services, education and employment opportunities. Public transport is limited.	Development on the site is likely to be relatively car dependent as Isleham offers only a limited range of services, education and employment opportunities. Public transport is limited.	Development on the site is likely to be relatively car dependent as Isleham offers only a limited range of services, education and employment opportunities. Public transport is limited.	Development on the site is likely to be relatively car dependent as Isleham offers only a limited range of services, education and employment opportunities. Public transport is limited.	Development on the site is likely to be relatively car dependent as Isleham offers only a limited range of services, education and employment opportunities. Public transport is limited.	Development on the site is likely to be relatively car dependent as Isleham offers only a limited range of services, education and employment opportunities. Public transport is limited.	

4.4 Environment	Will it protect, enhance and manage the character and appearance of landscape/townscape, maintaining and strengthening local distinctiveness and sense of place?	~	~	~	~	~	~	~	~
	Will it protect, manage and improve local environmental quality and help towards 'doubling nature' in Cambridgeshire?	Effects on local landscape/townscape will depend on the design of the development scheme and other policies in the development plan. May affect a 'key view' identified by INP.	Effects on local landscape/townscape will depend on the design of the development scheme and other policies in the development plan. May affect a 'key view' identified by INP.	Effects on local landscape/townscape will depend on the design of the development scheme and other policies in the development plan.	Effects on local landscape/townscape will depend on the design of the development scheme and other policies in the development plan.	Effects on local landscape/townscape will depend on the design of the development scheme and other policies in the development plan.	Effects on local landscape/townscape will depend on the design of the development scheme and other policies in the development plan.	Effects on local landscape/townscape will depend on the design of the development scheme and other policies in the development plan.	By not allocating a site, no development opportunity would be created. Therefore, the option would have no effect in respect of the objective.
	Will it achieve high quality sustainable design for buildings, spaces and the public realm?	Effects on local environmental quality will depend on the design of the development scheme and other policies in the development plan.	Effects on local environmental quality will depend on the design of the development scheme and other policies in the development plan.	Effects on local environmental quality will depend on the design of the development scheme and other policies in the development plan.	Effects on local environmental quality will depend on the design of the development scheme and other policies in the development plan.	Effects on local environmental quality will depend on the design of the development scheme and other policies in the development plan.	Effects on local environmental quality will depend on the design of the development scheme and other policies in the development plan.	Effects on local environmental quality will depend on the design of the development scheme and other policies in the development plan.	

SA topic	SA Objective	Key Questions	SA ISL7	AOS1	AOS2	AOS3	AOS4	AOS5	No site allocation (omit site policy)
5 Health	5.1 Maintain and enhance human health	Will it reduce death rates?	+	+	+	+	+	+	~
			Development of the site is unlikely	Development of the site is unlikely	Development of the site is unlikely	Development of the site is unlikely	Development of the site is unlikely	Development of the site is unlikely	By not allocating a site, no

			to affect death rates.	to affect death rates.	to affect death rates.	to affect death rates.	to affect death rates.	to affect death rates.	development opportunity would be created. Therefore, the option would have no effect in respect of the objective.
		Will it encourage healthy lifestyles?	Isleham offers recreation facilities and public rights of way. Some day-to-day needs can be met within walking distance of the site.	Isleham offers recreation facilities and public rights of way. Some day-to-day needs can be met within walking distance of the site.	Isleham offers recreation facilities and public rights of way. Some day-to-day needs can be met within walking distance of the site.	Isleham offers recreation facilities and public rights of way. Some day-to-day needs can be met within walking distance of the site.	Isleham offers recreation facilities and public rights of way. Some day-to-day needs can be met within walking distance of the site.	Isleham offers recreation facilities and public rights of way. Some day-to-day needs can be met within walking distance of the site.	
5.2 Reduce and prevent crime, and reduce the fear of crime	Will it reduce actual levels of crime? Will it reduce fear of crime?		~	~	~	~	~	~	~
			Development of the site is not expected to have a measurable impact on levels of crime of fear of crime.	Development of the site is not expected to have a measurable impact on levels of crime of fear of crime.	Development of the site is not expected to have a measurable impact on levels of crime of fear of crime.	Development of the site is not expected to have a measurable impact on levels of crime of fear of crime.	Development of the site is not expected to have a measurable impact on levels of crime of fear of crime.	Development of the site is not expected to have a measurable impact on levels of crime of fear of crime.	By not allocating a site, no development opportunity would be created. Therefore, the option would have no effect in respect of the objective.
5.3 Improve the quantity and quality of publicly accessible open space	Will it increase the quantity and quality of publicly accessible open space?		+	+	+	+	+	+	~
			The Local Plan requires new developments to contribute to the provision of open space, sport and recreation facilities.	The Local Plan requires new developments to contribute to the provision of open space, sport and recreation facilities.	The Local Plan requires new developments to contribute to the provision of open space, sport and recreation facilities.	The Local Plan requires new developments to contribute to the provision of open space, sport and recreation facilities.	The Local Plan requires new developments to contribute to the provision of open space, sport and recreation facilities.	The Local Plan requires new developments to contribute to the provision of open space, sport and recreation facilities.	By not allocating a site, no development opportunity would be created. Therefore, the option would have no effect in respect of the objective.

SA topic	SA Objective	Key Questions	SA ISL7	AOS1	AOS2	AOS3	AOS4	AOS5	No site allocation (omit site policy)
6 Inclusive communities	6.1 Improve the quality, range and accessibility of services and facilities (e.g. health, transport, education, training, leisure opportunities)		+	+	+	+	+	+	~
		Will it improve accessibility to key local services and facilities?	The site adjoins the built area of Isleham village and is within walking distance of local services and facilities. Development is likely to be relatively car-dependent to meet day-to-day needs, such as employment, secondary or higher education, supermarkets, etc.	The site adjoins the built area of Isleham village and is within walking distance of local services and facilities. Development is likely to be relatively car-dependent to meet day-to-day needs, such as employment, secondary or higher education, supermarkets, etc.	The site adjoins the built area of Isleham village and is within walking distance of local services and facilities. Development is likely to be relatively car-dependent to meet day-to-day needs, such as employment, secondary or higher education, supermarkets, etc.	The site adjoins the built area of Isleham village and is within walking distance of local services and facilities. Development is likely to be relatively car-dependent to meet day-to-day needs, such as employment, secondary or higher education, supermarkets, etc.	The site adjoins the built area of Isleham village and is within walking distance of local services and facilities. Development is likely to be relatively car-dependent to meet day-to-day needs, such as employment, secondary or higher education, supermarkets, etc.	The site adjoins the built area of Isleham village and is within walking distance of local services and facilities. Development is likely to be relatively car-dependent to meet day-to-day needs, such as employment, secondary or higher education, supermarkets, etc.	By not allocating a site, no development opportunity would be created. Therefore, the option would have no effect in respect of the objective.
		Will it improve accessibility by means other than the car?	Through increasing the population, development of the site could provide additional footfall for community facilities and public transport. The site adjoins Isleham's Conservation Area and therefore will have good access to the historic environment.	Through increasing the population, development of the site could provide additional footfall for community facilities and public transport. The site is in close proximity to Isleham's Conservation Area and therefore has good access to the historic environment.	Through increasing the population, development of the site could provide additional footfall for community facilities and public transport. The site adjoins Isleham's Conservation Area and therefore will have good access to the historic environment.	Through increasing the population, development of the site could provide additional footfall for community facilities and public transport. The site is in close proximity to Isleham's Conservation Area and therefore has good access to the historic environment.	Through increasing the population, development of the site could provide additional footfall for community facilities and public transport. The site is in close proximity to Isleham's Conservation Area and therefore has good access to the historic environment.	Through increasing the population, development of the site could provide additional footfall for community facilities and public transport. The site is in close proximity to Isleham's Conservation Area and therefore has good access to the historic environment.	
		Will it support and improve community and public transport?							
		Will it improve and broaden access to the local historic environment?							

			++	+	+	+	+	+	~
	6.2 Redress inequalities related to age, gender, disability, race, faith, location and income	Will it improve relations between people from different backgrounds or social groups?	The development of the site will provide a supply of new homes in the village. Policies in the Development plan require a portion of new homes to be affordable, thereby improving interaction between people of different backgrounds or groups. The INP states that the site is the ownership of a local almshouse charity and that 'we are confident that this site could be developed with both sensitivity and reflecting the need to prioritise the development of shared ownership / affordable properties'.	The development of the site will provide a supply of new homes in the village. Policies in the Development plan require a portion of new homes to be affordable, thereby improving interaction between people of different backgrounds or groups.	The development of the site will provide a supply of new homes in the village. Policies in the Development plan require a portion of new homes to be affordable, thereby improving interaction between people of different backgrounds or groups.	The development of the site will provide a supply of new homes in the village. Policies in the Development plan require a portion of new homes to be affordable, thereby improving interaction between people of different backgrounds or groups.	The development of the site will provide a supply of new homes in the village. Policies in the Development plan require a portion of new homes to be affordable, thereby improving interaction between people of different backgrounds or groups.	The development of the site will provide a supply of new homes in the village. Policies in the Development plan require a portion of new homes to be affordable, thereby improving interaction between people of different backgrounds or groups.	By not allocating a site, no development opportunity would be created. Therefore, the option would have no effect in respect of the objective.
		Will it reduce poverty and social exclusion in those areas most affected?							

		Will it promote accessibility for all members of society?	The site is within a reasonable walking distance of village services and facilities.	The site is within a reasonable walking distance of village services and facilities.	The site is within a reasonable walking distance of village services and facilities.	The site is within a reasonable walking distance of village services and facilities.	The site is within a reasonable walking distance of village services and facilities.	The site is within a reasonable walking distance of village services and facilities.	
6.3 Ensure all groups have access to decent, appropriate and affordable housing			+	+	+	+	+	+	~
		Will it support the provision of a range of housing types and sizes to meet the identified needs of all sectors of the community?	Policies within the current Development Plan and draft INP require new developments to provide a mix of house types and sizes.	Policies within the current Development Plan and draft INP require new developments to provide a mix of house types and sizes.	Policies within the current Development Plan and draft INP require new developments to provide a mix of house types and sizes.	Policies within the current Development Plan and draft INP require new developments to provide a mix of house types and sizes.	Policies within the current Development Plan and draft INP require new developments to provide a mix of house types and sizes.	Policies within the current Development Plan and draft INP require new developments to provide a mix of house types and sizes.	By not allocating a site, no development opportunity would be created. Therefore, the option would have no effect in respect of the objective.
		Will it reduce the number of unfit homes?	New homes will be built to modern building regulations and will therefore increase the supply of quality homes.	New homes will be built to modern building regulations and will therefore increase the supply of quality homes.	New homes will be built to modern building regulations and will therefore increase the supply of quality homes.	New homes will be built to modern building regulations and will therefore increase the supply of quality homes.	New homes will be built to modern building regulations and will therefore increase the supply of quality homes.	New homes will be built to modern building regulations and will therefore increase the supply of quality homes.	
		Will it meet the needs of the travelling community?	The site is not expected to make provision for the travelling community.	The site is not expected to make provision for the travelling community.	The site is not expected to make provision for the travelling community.	The site is not expected to make provision for the travelling community.	The site is not expected to make provision for the travelling community.	The site is not expected to make provision for the travelling community.	
6.4 Encourage and enable the active involvement of local people in community activities			+++	~	~	~	~	~	--
		Will it increase the ability of people to influence decisions?	The INP has been prepared to reflect the views and aspirations of local people. The site is proposed for allocation by the INP. Allocation of the site will enable this	The INP does not suggest there is a local aspiration to develop the site.	The INP does not suggest there is a local aspiration to develop the site.	The INP does not suggest there is a local aspiration to develop the site.	The INP does not suggest there is a local aspiration to develop the site.	The INP does not suggest there is a local aspiration to develop the site.	By not allocating a site, the INP would fail to deliver the community aspiration for major housing development.

		Will it provide better opportunities for people to understand local heritage, buildings and to participate in cultural and leisure activities?	community aspiration to be delivered. The site adjoins Isleham's Conservation Area and therefore will have good access to the historic environment.	The site is in close proximity to Isleham's Conservation Area and therefore has good access to the historic environment.	The site adjoins Isleham's Conservation Area and therefore will have good access to the historic environment.	The site is in close proximity to Isleham's Conservation Area and therefore has good access to the historic environment.	The site is in close proximity to Isleham's Conservation Area and therefore has good access to the historic environment.	The site is in close proximity to Isleham's Conservation Area and therefore has good access to the historic environment.	
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SA topic	SA Objective	Key Questions	SA ISL7	AOS1	AOS2	AOS3	AOS4	AOS5	No site allocation (omit site policy)
7 Economic activity	7.1 Help people gain access to satisfying work appropriate to their skills, potential and place of residence		~	~	~	~	~	~	~
		Will it encourage business development?	Development of the site would be for housing development and therefore is unlikely to directly generate employment or business opportunities.	Development of the site would be for housing development and therefore is unlikely to directly generate employment or business opportunities.	Development of the site would be for housing development and therefore is unlikely to directly generate employment or business opportunities.	Development of the site would be for housing development and therefore is unlikely to directly generate employment or business opportunities.	Development of the site would be for housing development and therefore is unlikely to directly generate employment or business opportunities.	Development of the site would be for housing development and therefore is unlikely to directly generate employment or business opportunities.	By not allocating a site, no development opportunity would be created. Therefore, the option would have no effect in respect of the objective.
		Will it improve the range of employment opportunities? Will it improve access to employment / access to employment by means other than the car? Will it encourage the rural economy and diversification?	Residents of the site would likely need to travel by car to access employment. The site is located in Isleham in East Cambridgeshire's rural area. New homes could bring workers to the rural area.	Residents of the site would likely need to travel by car to access employment. The site is located in Isleham in East Cambridgeshire's rural area. New homes could bring workers to the rural area.	Residents of the site would likely need to travel by car to access employment. The site is located in Isleham in East Cambridgeshire's rural area. New homes could bring workers to the rural area.	Residents of the site would likely need to travel by car to access employment. The site is located in Isleham in East Cambridgeshire's rural area. New homes could bring workers to the rural area.	Residents of the site would likely need to travel by car to access employment. The site is located in Isleham in East Cambridgeshire's rural area. New homes could bring workers to the rural area.	Residents of the site would likely need to travel by car to access employment. The site is located in Isleham in East Cambridgeshire's rural area. New homes could bring workers to the rural area.	

			+	+	+	+	+	+	~
	7.2 Support appropriate investment in people, places, communications and other infrastructure	Will it improve the level of investment in key community services and infrastructure?	The Development Plan requires new development to contribute to the provision of infrastructure and facilities. In addition, the INP identifies priority infrastructure which will be funded through the neighbourhood portion of CIL. Therefore, it is likely that development of the site will contribute to community services and infrastructure. Isleham has a primary school. Cambridgeshire County Council's Education Organisation Plan 2021-22 indicates that it is likely that additional primary school places would be required to accommodate growth. Residents would need to travel to other locations to	The Development Plan requires new development to contribute to the provision of infrastructure and facilities. In addition, the INP identifies priority infrastructure which will be funded through the neighbourhood portion of CIL. Therefore, it is likely that development of the site will contribute to community services and infrastructure. Isleham has a primary school. Cambridgeshire County Council's Education Organisation Plan 2021-22 indicates that it is likely that additional primary school places would be required to accommodate growth. Residents would need to travel to other locations to	The Development Plan requires new development to contribute to the provision of infrastructure and facilities. In addition, the INP identifies priority infrastructure which will be funded through the neighbourhood portion of CIL. Therefore, it is likely that development of the site will contribute to community services and infrastructure. Isleham has a primary school. Cambridgeshire County Council's Education Organisation Plan 2021-22 indicates that it is likely that additional primary school places would be required to accommodate growth. Residents would need to travel to other locations to	The Development Plan requires new development to contribute to the provision of infrastructure and facilities. In addition, the INP identifies priority infrastructure which will be funded through the neighbourhood portion of CIL. Therefore, it is likely that development of the site will contribute to community services and infrastructure. Isleham has a primary school. Cambridgeshire County Council's Education Organisation Plan 2021-22 indicates that it is likely that additional primary school places would be required to accommodate growth. Residents would need to travel to other locations to	The Development Plan requires new development to contribute to the provision of infrastructure and facilities. In addition, the INP identifies priority infrastructure which will be funded through the neighbourhood portion of CIL. Therefore, it is likely that development of the site will contribute to community services and infrastructure. Isleham has a primary school. Cambridgeshire County Council's Education Organisation Plan 2021-22 indicates that it is likely that additional primary school places would be required to accommodate growth. Residents would need to travel to other locations to	The Development Plan requires new development to contribute to the provision of infrastructure and facilities. In addition, the INP identifies priority infrastructure which will be funded through the neighbourhood portion of CIL. Therefore, it is likely that development of the site will contribute to community services and infrastructure. Isleham has a primary school. Cambridgeshire County Council's Education Organisation Plan 2021-22 indicates that it is likely that additional primary school places would be required to accommodate growth. Residents would need to travel to other locations to	By not allocating a site, no development opportunity would be created. Therefore, the option would have no effect in respect of the objective.
		Will it support provision of key infrastructure?							
		Will it improve access to education and training, and support provision of skilled employees?							

			access secondary, higher and further education.	access secondary, higher and further education.	access secondary, higher and further education.	access secondary, higher and further education.	access secondary, higher and further education.	access secondary, higher and further education.	
		Will it foster heritage-led regeneration and address heritage at risk?	The site is not expected to contribute to heritage-led regeneration or address heritage at risk.	The site is not expected to contribute to heritage-led regeneration or address heritage at risk.	The site is not expected to contribute to heritage-led regeneration or address heritage at risk.	The site is not expected to contribute to heritage-led regeneration or address heritage at risk.	The site is not expected to contribute to heritage-led regeneration or address heritage at risk.	The site is not expected to contribute to heritage-led regeneration or address heritage at risk.	
7.3 Improve the efficiency, competitiveness, vitality and adaptability of the local economy			~	~	~	~	~	~	~
	Will it improve business development and enhance competitiveness?	The site is located in Isleham in East Cambridgeshire's rural area. The development of new homes could bring workers to the rural area.	The site is located in Isleham in East Cambridgeshire's rural area. The development of new homes could bring workers to the rural area.	The site is located in Isleham in East Cambridgeshire's rural area. The development of new homes could bring workers to the rural area.	The site is located in Isleham in East Cambridgeshire's rural area. The development of new homes could bring workers to the rural area.	The site is located in Isleham in East Cambridgeshire's rural area. The development of new homes could bring workers to the rural area.	The site is located in Isleham in East Cambridgeshire's rural area. The development of new homes could bring workers to the rural area.	The site is located in Isleham in East Cambridgeshire's rural area. The development of new homes could bring workers to the rural area.	By not allocating a site, no development opportunity would be created. Therefore, the option would have no effect in respect of the objective.
	Will it support Cambridgeshire's lead role in research and technology-based industries, higher education and research?								
	Will it support sustainable tourism?	The site is not expected to contribute to sustainable tourism. Residents of the site would likely need to travel by car to access retail (with the exception of day-to-day	The site is not expected to contribute to sustainable tourism. Residents of the site would likely need to travel by car to access retail (with the exception of day-to-day	The site is not expected to contribute to sustainable tourism. Residents of the site would likely need to travel by car to access retail (with the exception of day-to-day	The site is not expected to contribute to sustainable tourism. Residents of the site would likely need to travel by car to access retail (with the exception of day-to-day	The site is not expected to contribute to sustainable tourism. Residents of the site would likely need to travel by car to access retail (with the exception of day-to-day	The site is not expected to contribute to sustainable tourism. Residents of the site would likely need to travel by car to access retail (with the exception of day-to-day	The site is not expected to contribute to sustainable tourism. Residents of the site would likely need to travel by car to access retail (with the exception of day-to-day	
	Will it protect the shopping hierarchy, supporting vitality and viability?								

			convenience retail).	convenience retail).	convenience retail).	convenience retail).	convenience retail).	convenience retail).	
		Will it support the sustainable use of historic farmsteads?	The site is not expected to contribute to supporting the sustainable use of historic farmsteads.	The site is not expected to contribute to supporting the sustainable use of historic farmsteads.	The site is not expected to contribute to supporting the sustainable use of historic farmsteads.	The site is not expected to contribute to supporting the sustainable use of historic farmsteads.	The site is not expected to contribute to supporting the sustainable use of historic farmsteads.	The site is not expected to contribute to supporting the sustainable use of historic farmsteads.	

Appendix 3: Responses to informal consultation on draft Environmental Report (Nov 2021)

Historic England

Thank you for your email consulting Historic England on the SEA for Isleham Neighbourhood Plan.

We would refer you to the advice in *Historic England Advice Note 8: Sustainability Appraisal and Strategic Environmental Assessment*, which can be found here:

[<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>](https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/). This advice sets out the historic environment factors which need to be considered during the Strategic Environmental Assessment or Sustainability Appraisal process, and our recommendations for information you should include.

We would also refer you to *Historic England Advice Note 3: Site Allocations and Local Plans*. This advice note sets out what we consider to be a robust process for assessing the potential impact of site allocations on any relevant heritage assets. In particular we would highlight the Site Selection Methodology set out on Page 5. This is similar to the methodology used to assess potential impacts on the setting of heritage assets (Good Practice Advice 3) but is focused specifically on the site allocation process.

As set out in our previous response, we would expect a proportionate assessment based on this methodology to be undertaken for any site allocation where there was a potential impact, either positive or negative, on a heritage asset, and the SEA consequently to advise on how any harm should be minimised or mitigated. Advice Note 3 can be found here:

[<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>](https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/)

Paragraph 31 of the NPPF makes clear that “*the preparation and review of all policies should be underpinned by relevant and up-to-date evidence*”. Paragraph 195 states that *Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal*.

We note that paragraph 4.130 makes reference to the ‘Heritage Gateway’ site. This is not an appropriate source of information for the SEA, as it is not necessarily up to date. The Cambridgeshire HER should be consulted directly, and its data analysed by an appropriately qualified archaeologist to inform any necessary desk-based assessment of potential impact owing to the development of either ISL7, or the reasonable alternative sites considered.

Paragraph 5.114 states that there are no heritage assets within the development site. This has not been demonstrated, as the site may contain non-designated heritage assets of archaeological significance. The SEA should, as noted above, consider the potential for this as part of its assessment.

We note also the suggested mitigating policy wording proposed by the SEA in paragraph 5.114, and suggest the following modifications:

The design of the scheme should respond appropriately to Isleham’s rich historic environment and be informed by a Heritage Statement which, as a minimum, should:

- **identify the relationship of the site to heritage assets;**
- **describe the significance of the heritage assets affected by the proposed development, including where appropriate the contribution made by the development site to their setting;**
- **quantify the impact of the development on the significance of the heritage asset; and**
- **recommend and justify the mitigation measures that should be taken in designing the scheme to avoid or limit harm to heritage assets owing to development within their settings.**

There is a typo on Page 116, which appears to recommend the expansion of the primary school under historic environment mitigation recommendations.

Historic England strongly advises that the conservation and archaeological staff of the relevant local planning authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), which should be consulted as part of the SEA process. In addition, they will be able to advise how any site allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SA/SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SA/SEA, these would have an adverse effect upon the environment.

Please contact me if you have any queries.

Yours sincerely,

Edward James

Historic Places Advisor, East of England

Natural England

Thank you for this additional information on Isleham Neighbourhood Plan.

Natural England is satisfied that the Environmental Report meets the statutory requirements of the SEA process. We welcome *Recommended mitigation measure 1 – Nature Conservation sites (all site options)*, which requires development proposals to undertake an ecological assessment which considers the effects of increased recreational pressure on sensitive sites designated for nature conservation. Natural England agrees with ECDC's view that subject to applying this mitigation the draft Isleham Neighbourhood Plan is not likely to lead to adverse impact on the natural environment including statutorily designated sites.

Kind regards

Kayleigh

Kayleigh Sargent

Planning Lead Adviser

Essex, Herts, Beds, Cambs, Northants

Natural England

Appendix 4: Archaeological Advice, Historic Environment Team

Apologies for the delayed advice. As this is rather late in the day, we are providing our response rather rapidly but we would seek to set up a better process for future consultations. Below is the archaeological advice from the development management team while I have attached the HER data as well. I doubt you will have much time to digest the HER data but it could be used for illustrative purposes. I did check and we believe advice on neighbourhood plans is covered in the SLA with East Cambs so a charge is not necessary.

Archaeological Advice:

AOS1 – NGR 563840 273720 – Site immediately east of three known ring ditches representing remains of prehistoric barrow burials (MCB17114); a fourth probable ring ditch is also present (MCB31083). Multiple sites of metal detection finds of later prehistoric, Roman and Medieval date (eg. 07559, 07559A, MCB16203, 10866) are present to the west. Prehistoric evidence has been excavated immediately opposite the site on the east side of Hall Barn Rd (CB15282), which fieldwork has shown to extend alongside the road to the south (MCB28013). Requires **pre-determination** fieldwork to enable evidence base to be supplied with any planning application.

AOS2 – NGR 564180 274060 – Site immediately north of Iron Age and Medieval (11th-13th c.) remains, including post-built structures, previously excavated at Isleham Recreation Ground (MCB20069, MCB22685). Prehistoric remains previously recorded in adjacent plot to west of site (MCB19231). SCHEDULED MONUMENT: Isleham priory at 240m NNW of this plot (NHLE ref 1013278); 19th century limekilns at 180m to NE. (NHLE 1006871). Requires **pre-determination** fieldwork to enable evidence base to be supplied with any planning application.

AOS3 – NGR 564660 274520 – A significant proportion of this site has previously been quarried for limestone clunch. Limited potential for archaeological survival. No objection, and no requirement for archaeological works in connection with the development of this site.

AOS4 – NGR 564790 274150 – The site is at the margins of known significant archaeology, but Medieval occupation evidence found in Orchard Close 170m to the NW (MCB18441, MCB18442). Two ring ditches are located to the east of the site (MCB27603, MCB27604). SCHEDULED MONUMENT: 19th century limekilns at 350m to NW of this plot. (NHLE 1006871). West half of plot is former limestone (clunch) quarry, eastern half undeveloped. An archaeological condition is recommended to be placed on any planning consent granted for development of this site.

AOS5 – NGR 565030 274370 – Two ring ditches of probable Bronze Age date are located to the south of the site (MCB27603, MCB27604). Medieval finds recorded immediately north (MCB19752, MCB19721) and Saxon, medieval and pot-medieval remains have been excavated at Houghtons Lane to the NE (MCB25469, MCB27643, MCB26822). Requires **pre-determination** fieldwork to enable evidence base to be supplied with any planning application.

HER Search

Associated HER data is attached in pdf report and GIS format. In the interests of expediency, I am providing the HER GIS immediately, but I would appreciate it if you could sign and return the attached gis licence.

Best wishes

Ruth

Ruth Beckley

Historic Environment Team, SAC1301, Cambridgeshire County Council, Sackville House, Sackville Way, Cambourne, Cambridge, CB23 6HL