

Date: 10 June 2022
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Dear Mr Kay

East Cambridgeshire Local Plan – Single Issue Review Regulation 19 Proposed Submission Consultation

Thank you for your consultation on the above in your letter dated 26 March 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.

You will be aware that Natural England has provided comments at the earlier stages of the Local Plan Single Issue Review, including comments on the scope of the Sustainability Appraisal (12 January 2021, ref. 337204) and on Housing Requirements (6 May 2021, ref. 348030).

Single Issue Review Proposed Submission Plan

The purpose of the SIR is to partially replace a very small part of the Local Plan adopted in April 2015. The Council considers that the volume of existing housing site 'commitments' comfortably exceed the quantum of the new housing requirement figure arising from the SIR. Consequently, there are no new allocations or changes to the Policies Map.

Since the proposed changes to the Local Plan relate only to housing figures, Natural England has no further substantive comments to those provided in response to earlier consultations. The SIR Proposed Submission Plan does not raise significant issues relating to matters within our natural environment remit. We therefore have no issues to raise in relation to the soundness of the Plan.

The narrow focus of the Plan review misses an opportunity to align plan policies with Ox Cam Arc, wider growth constraints and objectives and targets for the natural environment including climate change. We note the Council's view that recently adopted supplementary planning documents will help to bridge natural environment matters pending a full local plan update, to be undertaken once clarity is available in respect of a forthcoming Planning Act.

In preparation for the next full plan review Natural England encourages the Council to commence revision of the environmental evidence base as soon as possible. To ensure sustainable development contributes towards nature's recovery and climate change mitigation consideration should be given to:

- protecting and enhancing statutorily designated sites including Ouse Washes Special Protection Areas (SPA) functionally linked land identified through Natural England's 'goose

- and swan' IRZ¹;
- the air quality, nature, water and waste requirements of the Environment Act 2021 including delivery of Biodiversity Net Gain (BNG);
 - key objectives of the Defra 25 Year Environment Plan including establishment of a [Nature Recovery Network](#) (NRN). National Habitats Network mapping is available to view at [www.magic.defra.gov.uk](#);
 - Natural Cambridgeshire's 'Developing with Nature Toolkit' and the 'Doubling Nature' target and associated ambitions including connecting Cambridgeshire's fens;
 - the objectives and targets in the Cambridgeshire Green Infrastructure Strategy to address the significant deficit in accessible green infrastructure, to meet people's needs and to protect sensitive sites and habitats from the adverse effects of recreational pressure. Natural England's Cambridgeshire SSSI Recreational Pressure Impact Risk Zone (IRZ) can also be viewed at [www.magic.defra.gov.uk](#);
 - preparation of a Water Cycle Study to address water resource and water quality issues;
 - protection and enhancement of the important Fenland peat resource;
 - the findings and recommendations of visitor studies carried out for Soham Commons and Wicken Fen²;
 - the aspirations of the Fens Biosphere Vision ([www.fensbiosphere.org.uk](#)).

Sustainability Appraisal and Habitats Regulations Assessment

Natural England is satisfied that the Sustainability Appraisal (SA) and Habitats Regulations Assessment Screening (HRA) appear consistent with the requirements of the Planning and Compulsory Purchase Act 2004 and the Conservation of Habitats and Species Regulations 2017 as amended, respectively.

The HRA concludes that the SIR Local Plan, alone or in combination with other plans and projects, is unlikely to have any significant effects on Habitats Sites. Natural England agrees with this conclusion noting that the SIR does not promote additional growth and that development under committed sites has already been subject to assessment under the Habitat Regulations at the project stage.

The SA identifies that preferred policy (option1) will have no negative impact, including the natural environment, and is the option most aligned to national policy. We broadly support this conclusion.

Duty to Cooperate

Natural England welcome's the Council's preparation of a Duty to Cooperate Statement (May 2022) and has no specific comments to raise.

I hope you will find our comments helpful. For any correspondence or queries relating to this consultation only, please contact Janet Nuttall on [REDACTED]. For all new consultations, please contact [REDACTED]

[REDACTED]

[REDACTED]

Sustainable Land User Adviser

¹ Functionally-linked land describes areas of land or sea occurring *outside* of a SAC or SPA which nonetheless are considered critical to or necessary for the ecological or behavioural functioning of a qualifying feature for which that site has been designated. This is within the scope of the Habitats Regulations Assessments (HRAs) of new plans or projects required under the Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitats Regulations').

² Saunders P., Lake S., Lily D., Panter C., (2019) Visitor Survey of the National Trust's Wicken Fen 100 Year Vision Area. Unpublished Report by Footprint Ecology.