

Habitats Regulations Assessment of the Huntingdonshire Local Plan

HRA Scoping Report

August 2025



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

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LC-1376	Document Control Box
Client	Huntingdonshire District Council
Report Title	Habitats Regulations Assessment of the Huntingdonshire Local Plan: HRA Scoping Report
Status	Final
Filename	LC-1376_Huntingdonshire_Scoping Report_HRA_9_270825SC.docx
Date	August 2025
Author	FA
Reviewed	SC
Approved	ND

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Acronyms & Abbreviations

AA	Appropriate Assessment
AADT	Average annual daily traffic flow
ALAN	Artificial light at night
ALS	Abstraction Licensing Strategy
APIS	Air Pollution Information System
AW	Affinity Water
BNG	Biodiversity Net Gain
BTO	British Trust for Ornithology
CAMS	Catchment Abstraction Management Strategy
CIEEM	Chartered Institute of Ecology and Environmental Management
CSZ	Core Sustenance Zones
DEFRA	Department for Environment, Food & Rural Affairs
DfT	Department for Transport
DLHC	Department for Levelling Up, Housing and Communities
DMRB	Design Manual for Roads and Bridges
DTA	David Tyldesley and Associates
EA	Environment Agency
FLL	Functionally Linked Land
FZ	Flood Zone
GES	Good Ecological Status
G&T	Gypsy and Traveller
GIS	Geographic Information System
ha	Hectares
HDV	Heavy-duty vehicle
HRA	Habitats Regulations Assessment
IAQM	Institute of Air Quality Management
IRZ	Impact Risk Zone
IWMS	Integrated Water Management Strategy
JNCC	Joint Nature Conservation Committee
LSE	Likely Significant Effect
MHCLG	Ministry of Housing, Communities & Local Government
NE	Natural England
NNR	National Nature Reserve
NOx	Nitrous Oxides
NPPF	National Planning Policy Framework

ONS	Office for National Statistics
PPG	Planning Practice Guidance
pSAC	Possible/proposed Special Area of Conservation
pSPA	Potential Special Protection Area
RBMP	River Basin Management Plan
RIA	Recreational Impact Assessment
SAC	Special Area of Conservation
SAMM	Strategic Access Management and Monitoring
SANG	Suitable Alternative Natural Greenspace
SIP	Site Improvement Plan
SPA	Special Protection Area
SPD	Supplementary Planning Document
sqm	Square metres
SSSI	Site of Special Scientific Interest
SWFR	Surface Water Flood Risk
SWMC	Surface Water Management Catchment
SWMP	Surface Water Management Plan
UK	United Kingdom
WCS	Water Cycle Study
WeBS	Wetland Bird Survey
WFA	Whole Feature Assessment
WFD	Water Framework Directive
WRMP	Water Resource Management Plan
WRC	Water Recycling Centre
WRZ	Water Resource Zone
WwTW	Wastewater Treatment Works
ZoI	Zone of Influence

Executive summary

- E1. Huntingdonshire District Council is preparing a full update to the adopted Local Plan¹ to provide an up-to-date vision and framework to guide decision making on how, where and when development can come forward in the district for the period up to 2046.
- E2. The Council is currently at the preliminary stages of the plan-making process and is exploring growth strategy options for delivery of growth over the Plan period. The outputs from this process will inform the Preferred Options Local Plan, which is intended to be consulted upon in autumn 2025 and will include draft site allocations and planning policies. At this early stage of plan-making, four growth strategy options are being considered by the Council:
- **Strategy 1:** Strong focus on towns and cities;
 - **Strategy 2:** Sustainable locations served by public transport employment and infrastructure i.e. market towns and service centres;
 - **Strategy 3:** Dispersed growth to support existing settlements – some market town growth, but focus on service centres, large villages and villages; and,
 - **Strategy 4:** Freestanding strategic developments and limited dispersed growth – some market town growth, but focus on freestanding strategic sites, some small freestanding sites and service centres and large villages.
- E3. Lepus Consulting has been appointed, on behalf of Huntingdonshire District Council, to undertake a Habitats Regulations Assessment (HRA) alongside preparation of the Huntingdonshire Local Plan in compliance with the Habitats Regulations 2017 (as amended)².
- E4. HRA is undertaken in a number of stages. The first stage of the process is the screening stage (Stage 1), which aims to identify whether there are any aspects of a plan which may lead to a Likely Significant Effect (LSEs) at a European site, either alone or in-combination with other plans or projects. Stage 2 of the process, known as the Appropriate Assessment (AA), is undertaken where screening identifies LSEs. Where an AA concludes adverse impacts on site integrity cannot be mitigated, the next stage in the process is the consideration of alternative solutions (Stage 3). Where no alternative solutions are available it is next necessary to proceed to Stage 4 of the process, where consideration is given to imperative reasons of overriding public interest and securing compensatory measures.
- E5. An important initial stage of the screening process (Stage 1) is gathering information on European sites which may be affected by the Local Plan. This exercise is informally known

¹ Huntingdonshire District Council (2019) Huntingdonshire's Local Plan to 2036. Available at: <https://www.huntingdonshire.gov.uk/media/3872/190516-final-adopted-local-plan-to-2036.pdf> [Date accessed: 22/07/25]

² The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Date accessed: 01/07/25]

as 'scoping' and provides an understanding of potential impact pathways from the Local Plan and connections to European sites and their vulnerabilities.

- E6. This report provides the outputs of the scoping process. It also provides a high-level assessment of the four potential growth strategy options being considered by the Council for the Local Plan to help inform the plan-making process at the early stages of its development and avoid or mitigate any adverse effects upon the site integrity of any European site.
- E7. Consideration was given to potential links or causal connections between the effects of the four growth strategy options for the Local Plan and European sites to identify LSEs. This exercise was undertaken through the collation of information for each of the European sites located within the influence of the Plan area, and application of a 'source-pathway-receptor' model.
- E8. The following European sites and potential impacts associated with the Local Plan have been scoped into the HRA process:
- **Air quality:** Orton Pit SAC; and Portholme SAC.
 - **Water quality and quantity:** Fenland SAC; Nene Washes SAC; Nene Washes SPA; Nene Washes Ramsar; Orton Pit SAC; Ouse Washes SAC; Ouse Washes SPA; Ouse Washes Ramsar; Portholme SAC; The Wash & North Norfolk Coast SAC; The Wash SPA; The Wash Ramsar; Upper Nene Valley Gravel Pits SPA; Upper Nene Valley Gravel Pits Ramsar; and Woodwalton Fen Ramsar.
 - **Recreational pressure:** Barnack Hills & Holes SAC; Eversden & Wimpole Woods SAC; Fenland SAC; Nene Washes SPA; Nene Washes Ramsar; Ouse Washes SPA; Ouse Washes Ramsar; Portholme SAC; Upper Nene Valley Gravel Pits SPA; Upper Nene Valley Gravel Pits Ramsar; and Woodwalton Fen Ramsar.
 - **Urbanisation effects:** Eversden & Wimpole Woods SAC; Fenland SAC; Orton Pit SAC; Ouse Washes SPA; Ouse Washes Ramsar; Portholme SAC; Upper Nene Valley Gravel Pits SPA; Upper Nene Valley Gravel Pits Ramsar; and Woodwalton Fen Ramsar.
- E9. Each of the four growth strategy options are anticipated to result in LSEs upon these European sites. Strategies 1 and 2 were deemed to have a less significant air quality and urbanisation effect upon European sites. At this stage, no best performing option could be identified for the impact pathways associated with water quality and quantity, or recreational pressure.
- E10. The next stage of the HRA process will comprise a formal HRA screening assessment (Stage 1 of the HRA process) of all policies and allocations which will form the Local Plan, to accompany the Preferred Options consultation (at Regulation 18). Screening will take into consideration case law and best practice and outcomes will ensure the HRA influences the plan-making process and site selection in an iterative manner.

- E11. The outputs of the screening stage will identify LSEs of the Local Plan on European sites which have been scoped into the HRA process in this report and identify whether an AA will be required. It will also detail methods for AA and provide additional recommendations intended to help ensure that the Local Plan does not affect the integrity of any European site.

1 Introduction

1.1 A new Local Plan for Huntingdonshire

1.1.1 Huntingdonshire District Council (hereafter referred to as ‘the Council’) is preparing a full update to the adopted Local Plan³ to provide an up-to-date vision and framework to guide decision making on how, where and when development can come forward in the district for the period up to 2046.

1.1.2 The new Huntingdonshire Local Plan, referred to as the ‘Local Plan’ hereafter, will cover the entirety of Huntingdonshire District. This area is henceforth referred to as the ‘Plan area’ and is illustrated in **Figure 1.1**. The Plan area includes the district’s five main towns of Huntingdon, Godmanchester, Ramsey, St Neots and St Ives, together with a number of large and small villages and hamlets.

1.1.3 The Council is currently at the preliminary stages of the plan making process and is exploring growth strategy options for delivery of growth ambitions over the Plan period. The outputs from this process will inform the Preferred Options Local Plan which is intended to be consulted upon in autumn 2025 at Regulation 18 and will include draft site allocations and planning policies. At this early stage of plan-making, four growth strategy options are being considered by the Council:

- **Strategy 1:** Strong focus on towns and cities;
- **Strategy 2:** Sustainable locations served by public transport employment and infrastructure i.e. market towns and service centres;
- **Strategy 3:** Dispersed growth to support existing settlements – some market town growth, but focus on service centres, large villages and villages; and,
- **Strategy 4:** Freestanding strategic developments and limited dispersed growth – some market town growth, but focus on freestanding strategic sites, some small freestanding sites and service centres and large villages.

1.2 Habitats Regulations Assessment

1.2.1 Lepus Consulting has been appointed, on behalf of Huntingdonshire District Council, to undertake a Habitats Regulations Assessment (HRA) in support of the Huntingdonshire Local Plan.

1.2.2 The application of HRA to land-use plans is a requirement of the Conservation of Habitats and Species Regulations 2017 (as amended)⁴. HRA applies to plans and projects, including all Local Development Documents in England and Wales.

³ Huntingdonshire District Council (2019) Huntingdonshire’s Local Plan to 2036. Available at: <https://www.huntingdonshire.gov.uk/media/3872/190516-final-adopted-local-plan-to-2036.pdf> [Date accessed: 22/07/25]

⁴ Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

- 1.2.3 Where a plan is likely to have a significant effect on a European site (either alone, or in-combination) and is not directly connected with, or necessary to, the management of the European site, Regulation 105 of the Habitats Regulations notes that the plan-making authority for that plan must, before the plan is given effect, make an Appropriate Assessment (AA) of the implications for the site in view of that site's conservation objectives. These tests are referred to collectively as a Habitats Regulations Assessment (HRA).
- 1.2.4 The Habitats Regulations provide a definition of a European site at Regulation 8. These sites include Special Areas of Conservation (SAC), Sites of Community Importance, Special Protection Areas (SPA) and sites proposed to the European Commission in accordance with Article 4(1) of the Habitats Directive. In addition, policy in England and Wales notes that the following sites should also be given the same level of protection as a European site⁵:
- A potential SPA (pSPA);
 - A possible/proposed SAC (pSAC);
 - Listed and proposed Ramsar Sites (wetland of international importance); and,
 - In England, sites identified or required as compensation measures for adverse effects on statutory European sites, pSPA, pSAC, and listed or proposed Ramsar sites.
- 1.2.5 The Council, as the competent authority, is responsible for making the Integrity Test. The Integrity test asks whether the Local Plan will have an adverse effect upon the integrity of any European site (either alone, or in-combination) and will be undertaken in light of the conclusions of the HRA process having regard to representations made by Natural England (NE) under the provisions of the Habitats Regulations. The Integrity Test will be made following preparation of the full Local Plan, normally at the Pre-Submission (Publication) Consultation Stage at Regulation 19.
- 1.3 Purpose of report**
- 1.3.1 This report provides the outputs of an informal scoping process. It also provides a high-level assessment of the four potential growth strategy options for the Local Plan, as proposed by the Council, to help inform the plan-making process at the early stages of its development and avoid any adverse effects on European sites.
- 1.3.2 This HRA report has been prepared using the following guidance:
- Planning Practice Guidance: Appropriate Assessment⁶; and,
 - The Habitat Regulations Assessment Handbook - David Tyldesley and Associates (referred to hereafter as the DTA Handbook), 2013 (in particular Part F: 'Practical Guidance for the Assessment of Plans under the Regulations')⁷.

⁵ Ministry of Housing, Communities and Local Government (2024). National Planning Policy Framework. Para 194.

⁶ Ministry of Housing, Communities and Government (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment.

⁷ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (June) (2024) edition UK: DTA Publications Limited.

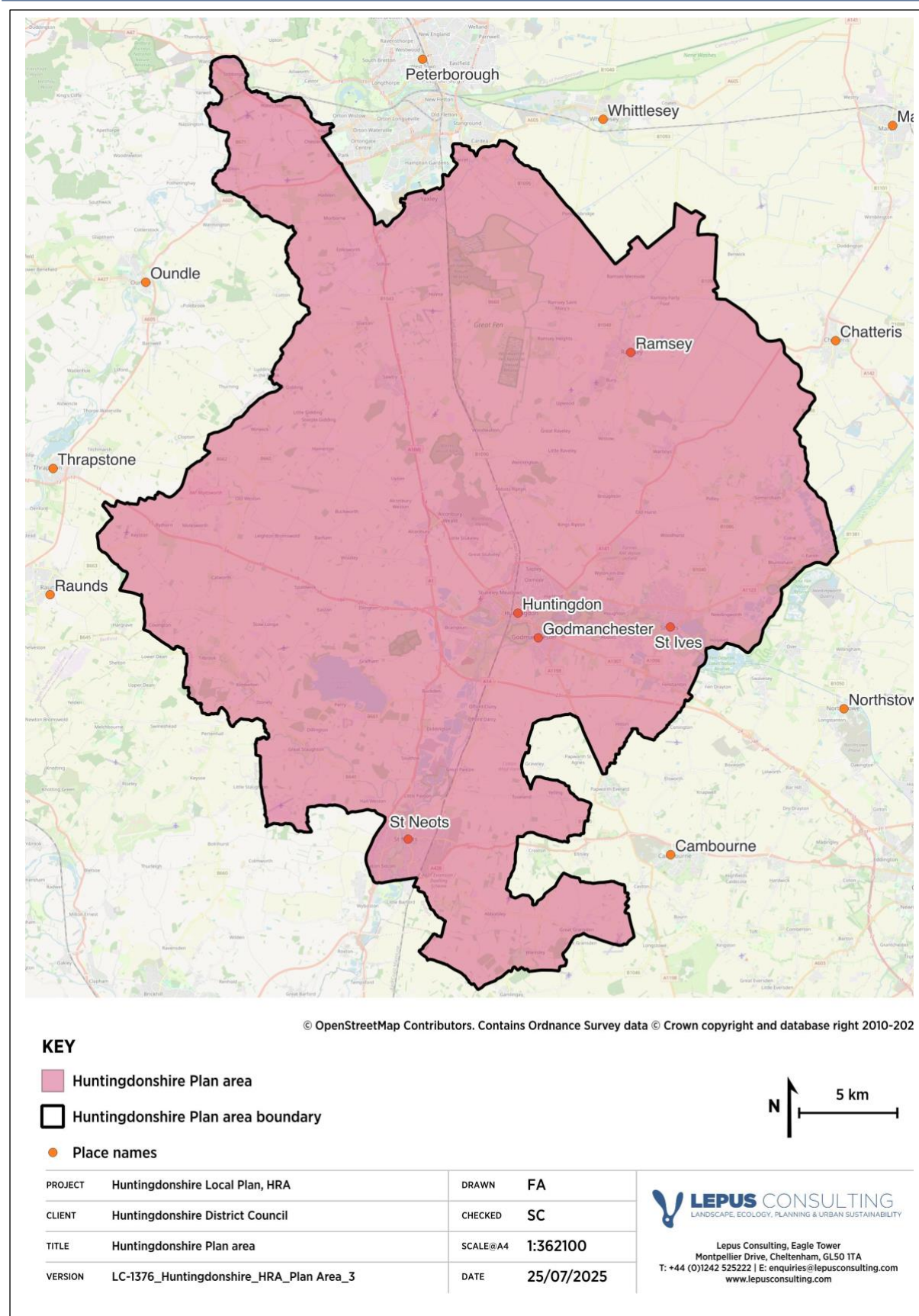


Figure 1.1: Huntingdonshire Plan Area

1.4 Previous HRA work

1.4.1 The Huntingdonshire Local Plan to 2036⁸ was adopted in May 2019 and sets out a development strategy and planning policies. It was supported by an HRA Screening⁹, which considered likely significant effects upon the following European sites, located within 15km of the Plan area or hydrologically linked to the Plan area:

- Barnack Hills & Holes SAC;
- Eversden & Wimpole Woods SAC;
- Fenland SAC;
- Nene Washes SAC,
- Nene Washes SPA;
- Nene Washes Ramsar;
- Orton Pit SAC;
- Ouse Washes SAC,
- Ouse Washes SPA;
- Ouse Washes Ramsar;
- Portholme SAC;
- Rutland Water SPA;
- Rutland Water Ramsar;
- The Wash & North Norfolk Coast SAC;
- The Wash SPA;
- The Wash Ramsar;
- Upper Nene Valley Gravel Pits SPA;
- Upper Nene Valley Gravel Pits Ramsar; and,
- Woodwalton Fen Ramsar.

1.4.2 The AA of this HRA concluded that there would be no adverse impacts on the integrity of European sites, either alone, or in-combination, so long as the *“policies identified as key in [the HRA] report are retained, and/or the wording changes recommended for policies highlighted are adopted”*.

⁸ Huntingdonshire District Council (2019) Huntingdonshire's Local Plan to 2036, May 2019. Available at: <https://www.huntingdonshire.gov.uk/media/3872/190516-final-adopted-local-plan-to-2036.pdf> [Date accessed: 25/07/25]

⁹ Bodsey Ecology Limited (2017) Huntingdonshire's Local Plan to 2036 – Habitats Regulations Assessment 2017. Available at: <https://www.huntingdonshire.gov.uk/media/2684/habitats-regulations-assessment-2017.pdf> [Date accessed: 01/07/25]

2 Methodology

2.1 Overview

2.1.1 HRA is a rigorous precautionary process centred around the conservation objectives of a European site's qualifying interests. It is intended to ensure that European sites are protected from impacts that could adversely affect their integrity. A step-by-step guide to the methodology followed for the HRA, as outlined in the DTA Handbook, is illustrated in **Figure 2.1**.

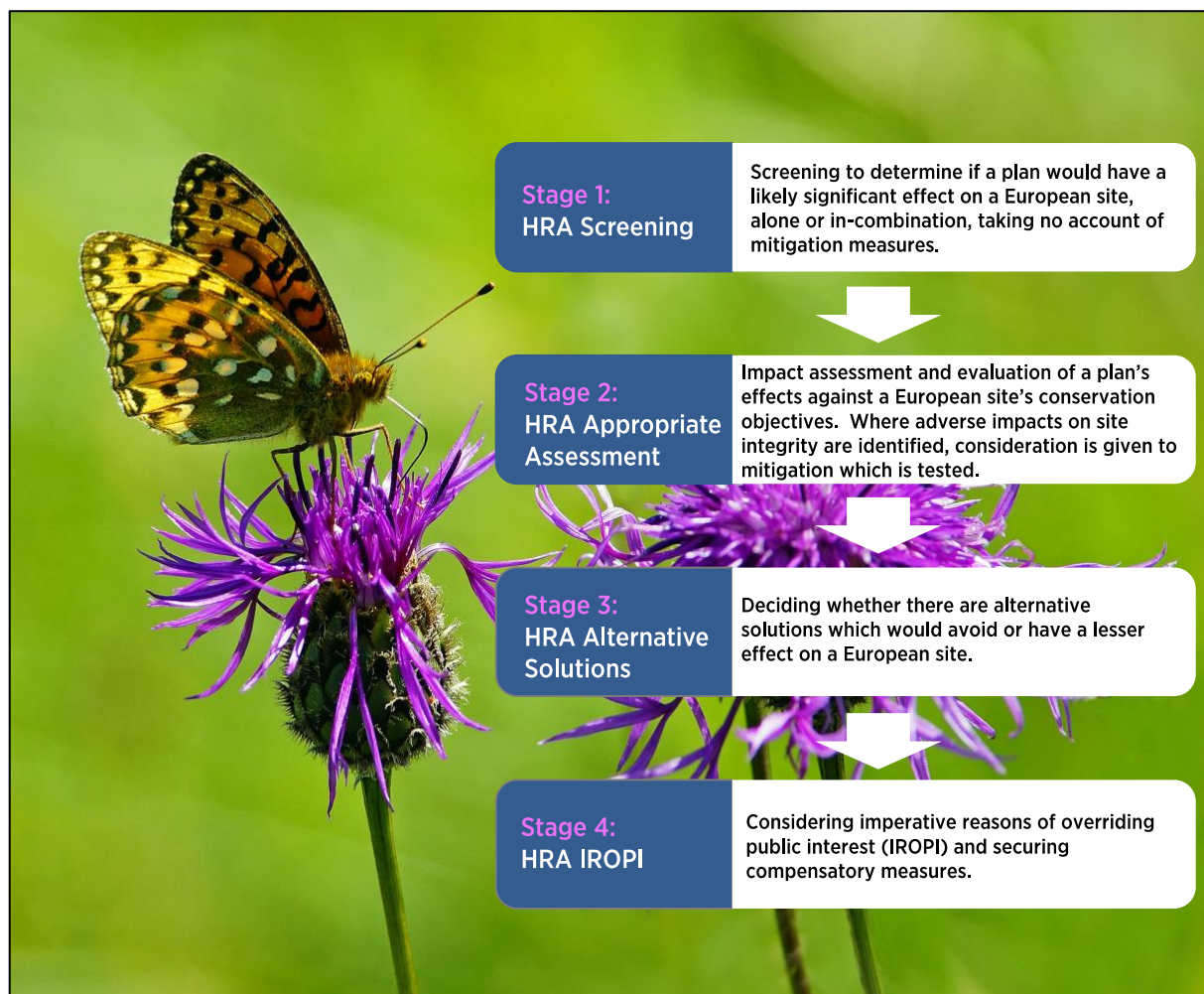


Figure 2.1: Stages in the Habitats Regulations Assessment process¹⁰

¹⁰ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (December) (2019) edition UK: DTA Publications Limited. Available at: <http://www.dtapublications.co.uk/> [Date accessed: 01/07/25]

2.2 Stage 1: Screening for Likely Significant Effects

- 2.2.1 The first stage in the HRA process comprises the screening stage (see **Figure 2.1**). The purpose of the screening process is to firstly determine whether a plan is either (1) exempt (because it is directly connected with or necessary to the management of a European site); (2) able to be excluded (because it is not a plan); or (3) able to be eliminated (because there would be no conceivable effects) from the HRA process. If none of these conditions apply, it is next necessary to identify whether there are any aspects of the Local Plan which may lead to a likely significant effect (LSE) at a European site, either alone, or in-combination with other plans or projects.
- 2.2.2 Where elements of the Local Plan will not result in an LSE on a European site (alone, or in-combination), these elements are screened out and not considered in further detail in the process. Where LSEs are identified, these elements of the Local Plan are screened in for further consideration in an AA. The screening process uses a number of evaluation codes to summarise whether or not a plan component is likely to have LSEs alone, or in-combination. These codes are set out in **Table 2.1** and are used to inform the formal screening decision (Column 2).

Table 2.1: Screening evaluation and reasoning categories from Part F of the DTA Handbook¹¹

Screening evaluation and reasoning categories from Chapter F of the Habitats Regulations Assessment Handbook (DTA Publications, 2013)	Screen in / Screen out
A. General statements of policy / general aspirations.	Screen Out
B. Policies listing general criteria for testing the acceptability / sustainability of proposals.	Screen Out
C. Proposal referred to but not proposed by the Plan.	Screen Out
D. General plan-wide environmental protection / designated site safeguarding / threshold policies.	Screen Out
E. Policies or proposals that steer change in such a way as to protect European sites from adverse effects.	Screen Out
F. Policies or proposals that cannot lead to development or other change.	Screen Out
G. Policies or proposals that could not have any conceivable or adverse effect on a site.	Screen Out
H. Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in-combination with other aspects of this or other plans or projects).	Screen Out
I. Policies or proposals with a Likely Significant Effect on a site alone.	Screen In
J. Policies or proposals unlikely to have a significant effect alone.	Screen Out
K. Policies or proposals unlikely to have a significant effect either alone or in-combination.	Screen Out
L. Policies or proposals which might be likely to have a significant effect in-combination.	Screen In
M. Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a European site.	Screen In

¹¹ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (December) (2019) edition UK: DTA Publications Limited. Available at: <http://www.dtapublications.co.uk/> [Date accessed: 01/07/25]

- 2.2.3 The judgement by the European Court of Justice on the interpretation of the Habitats Directive in the case of *People Over Wind and Sweetman vs Coillte Teoranta* (Case C-323/17¹²) determined that mitigation measures are only permitted to be considered as part of the AA stage of the HRA process. Therefore, when assessing the LSEs of the Local Plan on European sites, the HRA screening process will take no account of incorporated mitigation or avoidance measures that are intended to avoid or reduce harmful effects on a site. These are measures which, if removed (i.e. should they no longer be required for the benefit of a European site), would still allow the lawful and practical implementation of a plan.
- 2.2.4 Where screening concludes there are no LSEs from the Local Plan alone, it is next necessary to consider whether the effects of the Local Plan in-combination with other plans and projects would result in an LSE on any European site. It may be that the Local Plan alone will not have a significant effect but could have a residual effect that may contribute to in-combination effects on a European site.
- 2.2.5 This report presents the findings of an initial, high-level assessment of four site growth options, which will inform the plan-making process in its early stages and help to ensure adverse effects upon European sites are avoided or mitigated.
- 2.2.6 Plans and projects which are considered to be most relevant to the in-combination assessment of the Local Plan include those that have similar impact pathways. These include plans and projects with potential to increase development in the HRA study area. In addition, plans and projects with potential to increase traffic across the study area and which may act in-combination with the Local Plan, such as the transport^{13,14}, and waste and mineral¹⁵ plans, will also be considered. Plans which allocate water resources or are likely to influence water quality within the study area will also be considered. Finally, local plans of neighbouring authorities (listed below and detailed in **Appendix A**), which may increase development-related pressures at European sites, will be considered. It is recognised that the status of other plans and projects will change over the timescale of the development of the Local Plan; at the time of writing, neighbouring plans include:
- North Northamptonshire Local Plan¹⁶;
 - Peterborough Local Plan¹⁷;
 - Fenland Local Plan¹⁸;

¹² InfoCuria (2018) Case C-323/17. Available at: <http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN> [Date accessed: 01/07/25]

¹³ Cambridgeshire County Council (2015) Third Cambridgeshire Local Transport Plan 2011-2031: Policies and Strategy. Available at: [https://www.cambridgeshire.gov.uk/asset-library/imported-assets/The_Local_Transport_Plan_3%20\(1\).pdf](https://www.cambridgeshire.gov.uk/asset-library/imported-assets/The_Local_Transport_Plan_3%20(1).pdf) [Date accessed: 01/07/25]

¹⁴ Cambridgeshire County Council (2015) Huntingdonshire Transport Strategy: Action Plan. Available at: <https://www.cambridgeshire.gov.uk/asset-library/huntingdonshire-transport-strategy-action-plan-march-2024.pdf> [Date accessed: 01/07/25]

¹⁵ Cambridgeshire County Council and Peterborough City Council (2021) Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036. Available at: <https://www.cambridgeshire.gov.uk/business/planning-and-development/planning-policy/adopted-minerals-and-waste-plan> [Date accessed: 23/07/25]

¹⁶ North Northamptonshire Council (2016) North Northamptonshire Joint Core Strategy 2011-2031. Available at: <https://www.northnorthants.gov.uk/planning-strategies-and-plans/north-northamptonshire-local-plan> [Date accessed: 03/07/25]

¹⁷ Peterborough City Council (2019) Peterborough Local Plan 2016 to 2036. Available at: <https://www.peterborough.gov.uk/council/planning-and-development/planning-policies/local-development-plan> [Date accessed: 23/07/25]

¹⁸ Fenland District Council (2014) Fenland Local Plan (Adopted May 2014). Available at: https://www.fenland.gov.uk/media/12064/Fenland-Local-Plan-Adopted-2014/pdf/Fenland_Local_Plan-Adopted_2014.pdf?m=1591111057500 [Date accessed: 01/07/25]

- East Cambridgeshire District Local Plan¹⁹;
- South Cambridgeshire District Local Plan²⁰;
- Central Bedfordshire Local Plan²¹; and,
- Bedford Borough Local Plan²².

2.2.7 The approach taken to the consideration of in-combination effects will be compliant with the Wealden Judgement²³, which requires an in-combination approach that considers the development of neighbouring and nearby authorities when assessing LSEs.

2.3 Stage 2: Appropriate Assessment and Integrity Test

2.3.1 Stage 2 of the HRA process comprises the AA and Integrity Test. The purpose of the AA is to undertake an assessment of the implications of a plan for a European site in light of its conservation objectives²⁴.

2.3.2 As part of this process, plan makers should take account of the potential consequences of no action and the uncertainties inherent in scientific evaluation, and they should consult interested parties on the possible ways of managing the risk, for instance, through the adoption of mitigation measures. Mitigation measures should aim to avoid, minimise or reduce significant effects on European sites. Mitigation measures may take the form of policies within the Local Plan, or mitigation proposed through other plans or regulatory mechanisms. All mitigation measures must be deliverable and able to mitigate the adverse effects for which they are targeted.

2.3.3 The AA aims to present information regarding all aspects of the Local Plan and ways in which it could, either alone, or in-combination with other plans and projects, impact a European site. The plan-making body (as the Competent Authority) must then ascertain, based on the findings of the AA, whether the Local Plan will adversely affect the integrity of a European site, either alone, or in-combination with other plans and projects. This is referred to as the Integrity Test.

2.3.4 It is too early at this stage of the plan-making process to undertake an AA, as key pieces of the evidence base which will inform the Local Plan are in preparation. An AA, if required, will be undertaken to support the Local Plan as it develops.

¹⁹ East Cambridgeshire District Council (2023) East Cambridgeshire Local Plan 2015 (as amended 2023). Available at: <https://eastcambs.gov.uk/sites/default/files/2024-10/Local%20Plan%20adopted%2019%20October%202023%20-%20final%20with%20cover.pdf> [Date accessed: 01/07/25]

²⁰ South Cambridgeshire District Council (2018) South Cambridgeshire Local Plan (Adopted September 2018). Available at: <https://www.scambs.gov.uk/media/h0vjdxj/south-cambridgeshire-adopted-local-plan-2018-1.pdf> [Date accessed: 01/07/25]

²¹ Central Bedfordshire Council (2021) Central Bedfordshire Local Plan 2015-2035 (July 2021). Available at: https://www.centralbedfordshire.gov.uk/info/153/central_bedfordshire_local_plan_2015_to_2035/1034/adopted_local_plan [Date accessed: 23/07/25]

²² Bedford Borough Council (2022) Local Plan 2040: Plan for Submission (April 2022). Available at: <https://edrms.bedford.gov.uk/OpenDocument.aspx?id=xivh8bP%2bAJZXEaq26SnEFQ%3d%3d&name=PLAN%20FOR%20SUBMISSION.pdf> [Date accessed: 02/07/25]

²³ Wealden District Council & Lewes District Council before Mr Justice Jay. Available at: <http://SLP.bailii.org/ew/cases/EWHC/Admin/2017/351.html> [Date accessed: 01/07/25].

²⁴ MHCLG and DLHC (2019) Appropriate assessment: Guidance on use of Habitats Regulations Assessment. Available at: <https://www.gov.uk/guidance/appropriate-assessment> [Date accessed: 22/07/25]

2.4 Dealing with uncertainty

2.4.1 Uncertainty is an inherent characteristic of an HRA, and decisions can be made using currently available and relevant information. This concept is reinforced in the 7th September 2004 'Waddenzee' ruling²⁵:

2.4.2 *"However, the necessary certainty cannot be construed as meaning absolute certainty since that is almost impossible to attain. Instead, it is clear from the second sentence of Article 6(3) of the Habitats Directive that the competent authorities must take a decision having assessed all the relevant information which is set out in particular in the AA. The conclusion of this assessment is, of necessity, subjective in nature. Therefore, the competent authorities can, from their point of view, be certain that there will be no adverse effects even though, from an objective point of view, there is no absolute certainty."*

2.5 The Precautionary Principle

2.5.1 The HRA process is characterised by the Precautionary Principle. This is described by the European Commission: *"If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered"*. The Precautionary Principle is embedded in the Integrity Test.

²⁵ EUR-Lex (2004) Case C-127/02. Available at: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:62002CJ0127:EN:PDF>. [Date accessed: 01/07/25]

3 Scoping of threats and pressures at European sites

3.1 Introduction

- 3.1.1 An important initial stage of the screening process is gathering information on European sites which may be affected by the Local Plan. This is informally known as scoping and provides an understanding of potential impact pathways from the Local Plan and connections to European sites and their vulnerabilities. This information will be used to inform the high-level assessment of the four potential growth strategy options proposed by the Council (see **Chapter 4**).

3.2 Identification of an HRA study area

- 3.2.1 Each European site has its own intrinsic qualities, besides the habitats or species for which it has been designated, that enable the site to support its particular ecosystems. An important aspect of this is that the ecological integrity of each site can be vulnerable to change from natural and human-induced activities in the surrounding environment (known as pressures and threats). For example, sites can be affected by land use plans in a number of different ways, including the direct land take of new development; the type of use the land will be put to (for example, an extractive or noise-emitting use); or, the pressure/threat a development generates (air pollution, water pollution or increased recreational pressure) and the resources used (for example, water abstraction).
- 3.2.2 An intrinsic quality of any European site is its functionality at the landscape ecology scale. This refers to how the site interacts with its immediate surroundings, as well as the wider area. This is particularly the case where there is potential for development resulting from a plan to generate water or air-borne pollutants, use water resources, or otherwise affect water levels. Adverse effects may also occur via impacts to mobile species when located outside a designated site boundary, but which are qualifying features of the site. For example, there may be effects on protected birds, bats and fish which use land or waterbodies outside a designated site for foraging, feeding, spawning, roosting, breeding or other activities.
- 3.2.3 There is no guidance that defines the study area for inclusion in an HRA. Planning Practice Guidance (PPG) for AA indicates that: *“The scope and content of an appropriate assessment will depend on the nature, location, duration and scale of the proposed plan or project and the interest features of the relevant site. ‘Appropriate’ is not a technical term. It indicates that an assessment needs to be proportionate and sufficient to support the task of the competent authority in determining whether the plan or project will adversely affect the integrity of the site”*²⁶.

²⁶ MHCLG and DLHC (2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment. Available at: <https://www.gov.uk/guidance/appropriate-assessment>. [Date accessed: 01/07/25]

3.3 Scoping impact pathways

- 3.3.1 Threats and pressures to which European sites are vulnerable have been identified through reference to data held by the Joint Nature Conservation Committee (JNCC) and Natural England (NE), and through reference to Ramsar Information Sheets and Site Improvement Plans (SIPs). This information provides current and predicted issues at each European site and is summarised in **Appendix B**.
- 3.3.2 Supplementary Advice on Conservation Objectives prepared by NE often provides more recent information on threats and pressures upon European sites than SIPs and has, therefore, also been reviewed.
- 3.3.3 A number of threats and pressures are unlikely to be exacerbated by the Local Plan and have not been considered.
- 3.3.4 Sites of Special Scientific Interest (SSSIs) are protected areas in the United Kingdom (UK). SSSIs are the building blocks of site-based nature conservation in the UK. An SSSI will be designated based on the characteristics of its fauna, flora, geology and/or geomorphology. The conservation status of SSSI features that overlap with European sites offer a useful indicator of habitat/species health at a particular location.
- 3.3.5 NE conducts Whole Feature Assessments (WFAs) which measure the condition of each notified feature across the whole of a SSSI. The conservation status of each notified feature highlights any areas which are particularly vulnerable to threats/pressures. Conservation status is defined as below:
- Favourable;
 - Unfavourable – recovering;
 - Unfavourable – no change; or,
 - Unfavourable – declining.
- 3.3.6 SSSI features in either an 'Unfavourable – no change' or 'Unfavourable – declining' condition indicate that the European site may be particularly vulnerable to certain threats or pressures. It is important to remember that SSSI features may be in an unfavourable state due to the condition of features unrelated to its designation. However, it is considered that the conservation status of SSSI features that overlap with European sites offer a useful indicator of habitat/species health at a particular location.

3.3.7 NE defines zones around each SSSI which may be at risk from specific types of development; these are known as Impact Risk Zones (IRZs). These 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. The IRZs also cover the interest features and sensitivities of European sites, which are underpinned by the SSSI designation and ‘Compensation Site’, which have been secured as compensation for impacts on Natura 2000/Ramsar sites”²⁷. The location of IRZs has been taken into consideration in this assessment, as they provide a useful guide as to the location of functionally linked land and likely vulnerabilities to development proposed within the Local Plan.

3.3.8 Based on previous HRA work undertaken to support the adopted Local Plan (see **Section 1.4**), the following potential impact pathways are considered to be within the scope of influence of the Local Plan.

- **Air pollution:** Land use planning has the potential to increase atmospheric emissions of pollutants to the air. This can result in adverse effects at European sites, such as eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides)²⁸.
- **Water resources and water levels:** Development can change runoff rates from urbanised areas to European sites or watercourses which run through them. An increase in housing provision can also influence supply and demand for water within the region, which may impact water levels.
- **Water quality:** Surface water runoff from urban areas has the potential to reduce the quality of water entering a catchment. Water quality may also be reduced through point source effluent discharges from new development at Wastewater Treatment Works (WwTWs) and other controlled discharge sources.
- **Recreational pressure:** New housing development has the potential to increase recreational pressure upon European sites which are accessible to the public.
- **Urbanisation effects:** Development has the potential to result in disturbing activities (such as noise, lighting, cat predation and visual disturbance). Disturbance effects may impact upon European sites themselves, and their qualifying features, when outside a designated site boundary.

²⁷ Natural England (2019) Natural England’s Impact Risk Zones for Sites of Special Scientific Interest User Guidance. Available at: https://magic.defra.gov.uk/Metadata_for_magic/SSSI_IRZ_User_Guidance_MAGIC.pdf [Date accessed: 18/07/25]

²⁸ APIS. APIENs Home. Available at: <https://www.apis.ac.uk/APIENs>. [Date accessed: 01/07/25]

- 3.3.9 Land use planning also has the potential to result in impacts upon qualifying features of a European site when located outside a designation boundary, known as FLL. *“The term ‘functional linkage’ refers to the role or ‘function’ that land or sea beyond the boundary of a European site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified. Such land is therefore ‘linked’ to the European site in question because it provides an important role in maintaining or restoring the population of qualifying species at favourable conservation status”*²⁹. This HRA, therefore, also considers effects upon FLL or mobile species when located outside a designated site boundary within the above topic assessments.
- 3.3.10 The Local Plan will trigger development in the form of housing, employment and retail development. The exact location, scale and nature of this development is not known at this stage in the plan-making process.
- 3.3.11 European sites assessed in this HRA report were identified through consideration of a review of impact pathways and previous HRA work undertaken in support of the adopted Local Plan.

3.4 Air quality

- 3.4.1 The main mechanisms through which air pollution can have an adverse effect is through eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides). As highlighted through the review of threats and pressures at European sites (**Appendix B**), air pollution, and in particular atmospheric nitrogen deposition, has been identified as a threat or pressure for qualifying features of a number of European sites within the relevant SIPs and Supplementary Conservation Advice notes.
- 3.4.2 Excess atmospheric nitrogen deposition within an ecosystem or habitat can disrupt the delicate balance of ecological processes interacting with one another. As the availability of nitrogen increases in the local environment, some plants that are characteristic of that ecosystem may become competitively excluded in favour of more nitrophilic plants. It also upsets the ammonium and nitrate balance of the ecosystem, which disrupts the growth, structure and resilience of some plant species.
- 3.4.3 Excess nitrogen deposition often leads to the acidification of soils and a reduction in the soils’ buffering capacity (the ability of soil to resist pH changes). It can also render the ecosystem more susceptible to adverse effects of secondary stresses, such as frost or drought, and disturbance events, such as foraging by herbivores.

²⁹ Natural England (2016) Commissioned Report. NECR207. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects - a review of authoritative decisions. Available at: <https://publications.naturalengland.org.uk/publication/6087702630891520>. [Date accessed: 01/0725]

3.4.4 Natural England has developed a standard methodology for the assessment of traffic-related air quality impacts under the Habitats Regulations, which is relevant to the HRA of land use plans which may result in a change in traffic flows³⁰. In addition, the Institute of Air Quality Management (IAQM)³¹ and the Chartered Institute of Ecology and Environmental Management (CIEEM)³² have prepared advice on the assessment of air quality impacts at designated sites. This guidance sets thresholds for screening of air quality LSEs at the HRA screening stage (Stage 1 of the HRA process) and methodologies for further AA (Stage 2 of the HRA process) of air quality impacts where relevant.

3.4.5 NE's guidance (in the form of the questions below) has been applied to determine potential air quality impact pathways to European sites:

- Does the Local Plan give rise to emissions which are likely to reach a European site?
- Are the qualifying features of sites within 200m of a road sensitive to air pollution?
- Could the sensitive qualifying features of the site be exposed to emissions?
- Application of screening thresholds (alone and then, if necessary, in combination).

Does the Local Plan give rise to emissions which are likely to reach a European site?

3.4.6 The Local Plan will trigger housing and employment development and, therefore, increase traffic-related emissions. Air quality impacts have been shown to typically affect European sites within 10km of a Plan boundary³³. For the purpose of decision-making, unless local circumstances support a wider zone, JNCC guidance notes that plan HRA should take account of the potential effects of traffic emissions on European sites located within 10km of the plan boundary. This zone is based on professional judgment recognising that the effects of growth from development beyond 10km will have been accounted for in the Nitrogen Futures modelling work business as usual scenario³⁴.

3.4.7 This 10km distance threshold can be a useful guide to identify the broad areas that may be impacted by air quality. However, it is noted that consideration should also be given to larger residential or commercial allocations and their wider potential for air quality impacts, in the context of the local and regional road network, including key commuting areas.

³⁰ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001). Available at: <http://publications.naturalengland.org.uk/publication/4720542048845824>. [Date accessed: 01/07/25]

³¹ IAQM (2019) A guide to the assessment of air quality impacts on designated nature conservation sites – version 1.0. Available at: <https://iaqm.co.uk/text/guidance/air-quality-impacts-on-nature-sites-2019.pdf>. [Date accessed: 01/07/25]

³² CIEEM (2021) Advisory Note: Ecological Assessment of Air Quality Impacts. Available at: <https://cieem.net/wp-content/uploads/2020/12/Air-Quality-advice-note.pdf>. [Date accessed: 01/07/25]

³³ Chapman, C., and Kite, B. (2021) Guidance on Decision-making Thresholds for Air Pollution. Available at: <https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447>. [Date accessed: 09/05/25]

³⁴ Chapman, C., and Kite, B. (2021) Main Report Guidance on Decision-making Thresholds for Air Pollution. Available at: <https://data.jncc.gov.uk/data/6cce4f2e-e481-4ec2-b369-2b4026c88447/JNCC-Report-696-Main-FINAL-WEB.pdf>. [Date accessed: 28/08/25]

- 3.4.8 Data obtained from the Office for National Statistics (ONS) in 2021 highlights the most common destinations for journeys to work arising from, and finishing in, the Plan area³⁵. The most common commuting destinations/origins are Peterborough (which lies just north of the Plan area), Fenland (which is located northeast of the Plan area) and South Cambridgeshire (which is located southeast of the Plan area). Other common commuting destinations/origins include the neighbouring areas of Bedford and East Cambridgeshire. This commuting pattern is reflected in the Economic and Employment Needs Assessment prepared in support of the Local Plan³⁶.
- 3.4.9 European sites beyond 10km of the Plan area but within these key commuting areas which are sensitive to air quality effects are also considered within this HRA where they are linked to the Plan area via key strategic road links. These are roads which provide a clear route linking residential and employment areas within the Plan area.
- 3.4.10 Taking this information into consideration, a 10km buffer from the Plan area is considered precautionary, as it encompasses both the key commuting areas (**paragraph 3.4.7**) and strategic road links that connect to the Plan area.

Are the qualifying features of sites within 200m of a road sensitive to air pollution?

- 3.4.11 It is widely accepted that air quality impacts are greatest within 200m of a road source, decreasing with distance^{37,38,39}. Baseline mapping data has been used to determine the proximity of European sites, and their qualifying features, to roads (within 200m) which may result in an exceedance of NE's screening thresholds.
- 3.4.12 The UK Air Pollution Information System (APIS) provides information on all European sites and the sensitivity of their qualifying features (habitats and/or species) to air pollution. This data has been interrogated, alongside a desk-based review of site-based data (**Appendix B**), to determine whether there may be impact pathways from the Local Plan to any European site, through a change in atmospheric emissions.
- 3.4.13 The results (shown in **Table 3.1**) indicate that six European sites within 10km of the Plan area (which corresponds to the key commuting area) are sensitive to air quality impacts.

³⁵ ONS (2023) Visualising people flows. Available at: <https://www.ons.gov.uk/visualisations/censusorigindestination/#workplace> [Date accessed: 25/07/25]

³⁶ Volterra (2025) Economic and Employment Needs Assessment.

³⁷ The Highways Agency, Transport Scotland, Welsh Assembly Government, The Department for Regional Development Northern Ireland (2007) Design Manual for Roads and Bridges, Volume 11, Section 3, Part 1: Air Quality. Available at: <http://www.semmms.info/wp-content/uploads/2016/06/Design-Manual-for-Roads-and-Bridges-Volume-11-Section-3-Part-1.-PDF-981Kb.pdf>. [Date accessed: 01/07/25]

³⁸ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001). Available at: <http://publications.naturalengland.org.uk/publication/4720542048845824>. [Date accessed: 01/07/25]

³⁹ Bignal, K., Ashmore, M. & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No.580, Peterborough. Available at: <https://publications.naturalengland.org.uk/publication/133002>. [Date accessed: 01/07/25]

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- 3.4.14 Of the six European sites deemed sensitive to air quality impacts, Barnack Hills & Holes SAC, Eversden & Wimpole Woods SAC, Fenland SAC⁴⁰ and Woodwalton Fen Ramsar, are not located within 200m of a strategic road link. Therefore, these four sites can be scoped out of the HRA process in terms of air quality impacts. The remaining two European sites (Orton Pit SAC and Portholme SAC) are scoped into the HRA process based on air quality impact pathways.

⁴⁰ Fenland SAC is split across three components which lie 27 miles apart. The component of the SAC within 10km of the Plan area is underpinned by Woodwalton Fen SSSI.

Table 3.1: Assessment of air quality impact pathways for European sites within the influence of the Local Plan⁴¹

European sites within the influence of the Local Plan	Is the European site sensitive to air quality impacts (as per SIP – Appendix B)?	Is there a strategic road link (A and B road or motorway) located within 200m of the site?
Barnack Hills & Holes SAC	Yes	No (the closest strategic road link, the B1443, is located approximately 240m north of the site).
Eversden & Wimpole Woods SAC	Yes	No (the closest strategic road link, the A1198, is located approximately 650m from the site).
Fenland SAC	Yes	No (the closest strategic road link, the B660, is located approximately 1.9km to the north of the SAC).
Nene Washes SAC	No	N/A
Nene Washes SPA	No	N/A
Nene Washes Ramsar	No	N/A
Orton Pit SAC	Yes	Yes (the A1139 runs adjacent to the SAC's northern boundary and the A1260 runs adjacent to the eastern boundary of one of the SAC components).
Ouse Washes SAC	No	N/A
Ouse Washes SPA	No	N/A
Ouse Washes Ramsar	No	N/A
Portholme SAC	Yes	Yes (the A1307 is located approximately 40m from the SAC's northern boundary, the B1514 approximately 190m from this boundary, the B1044 approximately 150m from the eastern boundary, and the B1043 approximately 175m from the SAC's southern boundary).
Upper Nene Valley Gravel Pits SPA	No	N/A
Upper Nene Valley Gravel Pits Ramsar	No	N/A

⁴¹ Green shading in Chapter 3 scoping tables indicate threat / pressure at European site is scoped out. Red shading indicates threat / pressure at European site is scoped in for further consideration in the HRA process.

European sites within the influence of the Local Plan	Is the European site sensitive to air quality impacts (as per SIP – Appendix B)?	Is there a strategic road link (A and B road or motorway) located within 200m of the site?
Woodwalton Fen Ramsar	Yes	No (the closest strategic road link, the B660, is located approximately 1.9km to the north of the Ramsar).

Could the sensitive qualifying features of the site be exposed to emissions?

- 3.4.15 The Local Plan will trigger housing and employment development. Therefore, there is potential for an increase in traffic-related emissions within 10km of the Plan area and key commuting areas. As a consequence, there is potential for an increase in traffic-related emissions along road links located within 200m of four European sites that have been identified as sensitive to air quality impacts.

Application of screening thresholds (alone, and then if necessary, in-combination)

- 3.4.16 NE's advice on the assessment of air quality impacts under the Habitats Regulations states that consideration should be given to the risk of road traffic emissions associated with a local plan⁴². This advice states that an assessment of the risks from road traffic emissions can be expressed in terms of the average annual daily traffic flow (AADT, as a proxy for emissions). The use of the AADT screening threshold is advocated by Highways England in their Design Manual for Roads and Bridges (DMRB). This screening threshold is intended to be used as a guide to determine whether a more detailed assessment of the impact of emissions from road traffic is required. This non-statutory or guideline threshold is based on a predicted change of daily traffic flows of 1,000 AADT or more (or heavy-duty vehicle flows on motorways (HDV) change by 200 AADT or more).
- 3.4.17 The AADT thresholds do not themselves imply any intrinsic environmental effects and are used solely as a trigger for further investigation. Widely accepted environmental benchmarks for imperceptible impacts are set at 1% of the critical load or level, which is considered to be roughly equivalent to DMRB thresholds for changes in traffic flow of 1,000 AADT and for HDV of 200 AADT. This has been confirmed by modelling using the DMRB Screening Tool that used average traffic flow and speed figures from the Department for Transport (DfT) data to calculate whether the NO_x outputs could result in a change of >1% of critical load/level on different road types. A change of >1,000 AADT on a road was found to equate to a change in traffic flow which might increase emissions by 1% of the critical load or level and might consequentially result in an environmental effect nearby (e.g. within 10m of roadside).
- 3.4.18 The AADT thresholds and 1% of critical load/level are considered by NE to be suitably precautionary as any emissions below this level are widely considered to be imperceptible and, in the case of AADT, undetectable through the DMRB model. There can, therefore, be a high degree of confidence in its application to screen for risks of an effect.

⁴² Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001). Available at: <http://publications.naturalengland.org.uk/publication/4720542048845824> [Accessed: 22/07/25]

- 3.4.19 Given the Local Plan is currently at the preliminary stages of the plan-making process, traffic data was not available at the time of writing to allow application of the above screening thresholds. Taking a precautionary approach at this stage in the process, European sites identified in **Table 3.1** will, therefore, be scoped in for further consideration of air quality impacts in the HRA process.

3.5 Water quality and water quantity

- 3.5.1 Urban development coming forward through the Local Plan has the ability to affect water-dependent European sites through a number of impacts, as listed below. These impacts have the potential to change the water balance (levels) entering European sites and the quality of this water:

- Change in surface permeability and run off rates;
- Increased water demand to supply new homes and businesses;
- Reduced quality of surface water run off; and,
- Increased effluent discharge for treatment.

- 3.5.2 The Water Framework Directive (WFD) provides an indication of the health of the water environment and whether a water body is at 'good' status or potential. Surface water bodies can be classed as 'high', 'good', 'moderate', 'poor' or 'bad' status. This is determined through an assessment of a range of elements relating to the biology and chemical quality of surface waters and quantitative and chemical quality of groundwater. To achieve 'good' ecological status or potential, 'good' chemical status or 'good' groundwater status, every element assessed must be at 'good' status or better. If one element is below its threshold for 'good' status, then the status for the whole water body is classed below 'good'.

- 3.5.3 The WFD sets out areas which require special protection. These include areas designated for *"the protection of habitats or species where the maintenance or improvement of the status of water is an important factor in their protection including relevant Natura 2000 sites designated under Directive 92/43/EEC (the Habitats Directive) and Directive 79/409/EEC (the Birds Directive)"*⁴³.

- 3.5.4 The Local Plan may impact functionally linked watercourses and habitat through a deterioration in water quality, flows and loss, and/or deterioration of riparian and in-stream habitat. If this is the case, the Local Plan may have adverse effects on the achievement of the conservation objectives which aim to maintain and restore the condition of these features for relevant qualifying species. NE consider that 'good' ecological status under the WFD is an appropriate standard for functionally linked watercourse⁴⁴.

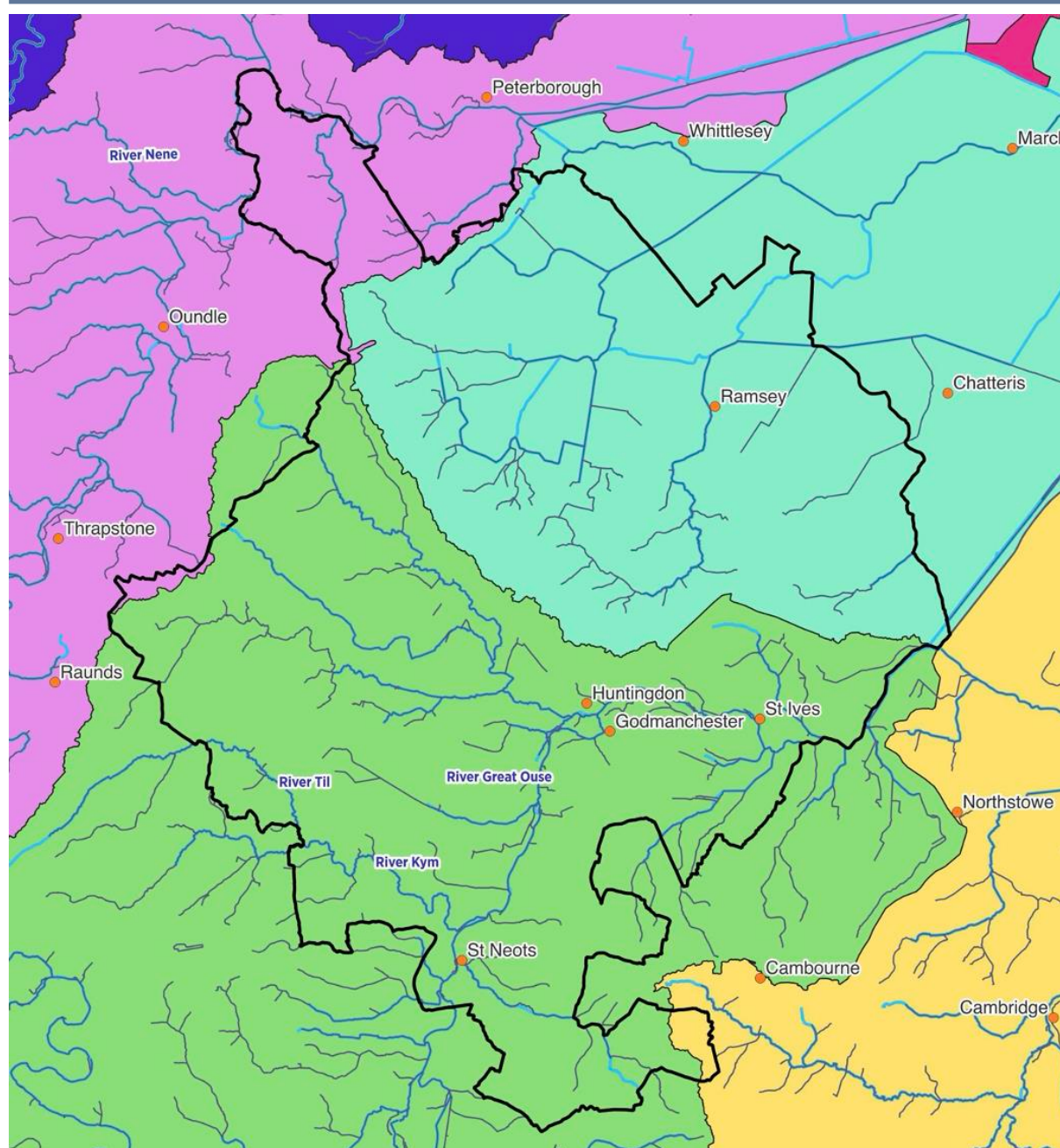
⁴³ Official Journal of the European Communities (2000) Directive 2000/60/EC of the European Parliament and of the Council of October 2000 establishing a framework for Community action in the field of water policy. Available at: https://eur-lex.europa.eu/resource.html?uri=cellar:5c835afb-2ec6-4577-bdf8-756d3d694eeb.0004.02/DOC_1&format=PDF. [Date accessed: 04/07/25]

⁴⁴ DEFRA (2014) Water Framework Directive implementation in England and Wales: new and updated standards to protect the water environment: May 2014. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/307788/river-basin-planning-standards.pdf [Date accessed: 01/07/25]

- 3.5.5 The main watercourse that flows through the Plan area is the River Great Ouse, with the River Nene also flowing along the northern Plan area boundary. The River Great Ouse and its tributaries, which include the River Kym and River Til, drain the southern section of the Plan area. These rivers form a network of watercourses that discharge at the Wash Estuary, through three European sites: The Wash SPA, The Wash Ramsar, and The Wash & North Norfolk Coast SAC. Several waterways that are part of the Middle Level Navigations waterway network are also located in the centre of the district, between the River Great Ouse and River Nene, and are largely used for land drainage. Numerous tributaries and smaller watercourses also flow through the Plan area, including Bury Brook, Cock Brook, Ellington Brook, Diddington Brook, West Brook, Marley Gap Brook, Billing Brook and Alconbury Brook.
- 3.5.6 The Plan area lies within the Anglian River Basin District. River Basin Districts are subdivided into surface water management catchments (SWMCs)⁴⁵. The majority of the northern half of the Plan area is located within the Old Bedford including the Middle Level SWMC and the majority of the southern part of the Plan area is located within the Ouse Upper and Bedford SWMC, with two small areas in the north and east falling into the Nene SWMC, and a very small portion of southeast Huntingdonshire falling within the Cam and Ely Ouse SWMC (see **Figure 3.1**).
- 3.5.7 River Basin Management Plans (RBMPs) provide a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resources are closely linked, they also inform decisions on land-use planning. **Appendix A** provides a summary of the Anglian RBMP⁴⁶.
- 3.5.8 Catchment Abstraction Management Strategies (CAMS) are six-year strategies developed by the Environment Agency (EA) for managing water resources at the local level, produced for every river catchment area in England and Wales. Through the CAMS process, the EA prepares an Abstraction Licensing Strategy (ALS) to manage water resources and contribute to implementation of the WFD, with strategies that feed into Water Resource Management Plans (WRMPs).

⁴⁵ DEFRA. River basin districts, England. Available at: <https://environment.data.gov.uk/catchment-planning/> [Date accessed: 04/07/25]

⁴⁶ Environment Agency (2022) Anglian river basin district river basin management plan: updated 2022. Available at: <https://www.gov.uk/guidance/anglian-river-basin-district-river-basin-management-plan-updated-2022> [Date accessed: 01/07/25]



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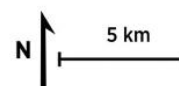
KEY

- Plan Area
- Major watercourses
- Watercourse links
- Place names

SWMCs

- Cam and Ely Ouse
- Nene
- North West Norfolk

- Old Bedford and Middle Level
- Ouse Upper and Bedford
- Welland



PROJECT	Huntingdonshire Local Plan, HRA	DRAWN	FA
CLIENT	Huntingdonshire District Council	CHECKED	SC
TITLE	Surface Water Management Catchments (SWMCs)	SCALE@A4	1:370500
VERSION	LC-1376_Huntingdonshire_HRA_SWMCs_1	DATE	18/07/2025



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Figure 3.1: Watercourses and Surface Water Management Catchments (SWMCs) in and around the Plan area

- 3.5.9 The Plan area is located predominantly within the Old Bedford including the Middle Level, and the Ouse Upper and Bedford ALS catchments. A small portion of the northern and eastern parts of the Plan area also falls within the Nene ALS catchment. A very small portion of southeast Huntingdonshire falls within the Cam and Ely Ouse ALS catchment. The ALSs outline the available water resources in each catchment area, alongside how these water resources are being used and the intention regarding management of further abstraction. European sites located within these catchment areas have the potential to be affected by water abstraction. The Old Bedford including the Middle Level ALS⁴⁷ lists the Ouse Washes SAC, SPA and Ramsar as vulnerable to the impacts of poor/unsustainable water abstraction practices. The Ouse Upper and Bedford ALS⁴⁸ lists Portholme SAC; the Ouse Washes SAC, SPA and Ramsar; The Wash & North Norfolk Coast SAC; and The Wash SPA, as able to be affected by abstraction practices within the ALS area. The Nene ALS⁴⁹ lists the Nene Washes SPA, Orton Pit SAC, the Upper Nene Valley Gravel Pits SPA and Ramsar, The Wash & North Norfolk Coast SAC, The Wash SPA and The Wash Ramsar as vulnerable to the impacts of poor/unsustainable water abstraction practices, due to the water-dependency of their qualifying features.
- 3.5.10 For the purposes of water resource planning and supply, the country is divided into Water Resource Zones (WRZs). WRZs are the largest possible zone for water resource management in which customers share the same risk of a resource shortfall. The Plan area is served by the Ruthamford North and Ruthamford South WRZs, as supplied by Anglian Water, and the Cambridge Water Company Wide WRZ, as supplied by Cambridge Water (see **Figure 3.2**). To increase resilience to drought, water trading with Affinity Water is discussed within the Anglian Water WRMP. Both Ruthamford North and South have been identified as being at risk of climate change impacts in the future; hence, Huntingdonshire's water supply is vulnerable to climate-related risks⁵⁰. The EA has designated the whole of the Anglian Water region as under serious water stress.
- 3.5.11 Decisions relating to water abstraction for supply and disposal of water are controlled through a number of licensing mechanisms and a high-level water planning framework which is subject to HRA. This ensures the protection of the water environment and compliance with the WFD. One element of this framework is the WRMP that each water service provider is obligated to produce and publish every five years. WRMPs articulate long term plans to accommodate the impacts of population growth, drought, environmental obligations and climate change uncertainty, in order to balance water supply and demand.

⁴⁷ Environment Agency (2017) Old Bedford including Middle Level abstraction licensing strategy. Available at: https://assets.publishing.service.gov.uk/media/5a82f227ed915d74e62386d3/ALS_2017_Old_Bedford.pdf [Date accessed: 04/07/25]

⁴⁸ Environment Agency (2017) Upper Ouse and Bedford Ouse abstraction licensing strategy. Available at: https://assets.publishing.service.gov.uk/media/5a820dd6e5274a2e87dc0e7f/ALS_2017_Upper_Ouse_and_Bedford_Ouse.pdf [Date accessed: 04/07/25]

⁴⁹ Environment Agency (2021) Nene Catchment Abstraction Licensing Strategy. Available at: <https://assets.publishing.service.gov.uk/media/606d91e28fa8f57359cf4346/CAMS-Nene-Catchment-Abstraction-Management-Strategy.pdf> [Date accessed: 04/07/25]

⁵⁰ Ibid.

3.5.12 The water service providers for the Plan area are Anglian Water and Cambridge Water. Anglian Water's 2024 WRMP⁵¹ highlights the potential for a shortfall of 571 megalitres of water a day by 2050, with a deficit anticipated across 25 of the 27 WRZs that Anglian Water supplies, if no action is taken. The WRMP outlines a number of measures that need to be taken to ensure the continuation of sustainable sources of supply, including smart metering, leakage reduction and progressing strategic resource options (such as making effective use of the Lincolnshire and Fens reservoirs). The Anglian Water WRMP was supported by an HRA⁵² which recommended mitigation measures that, if implemented, should help to avoid adverse impacts upon the integrity of any European sites either alone, or in-combination. Cambridge Water's WRMP⁵³ also demonstrates the potential for a growing supply/demand deficit in the absence of effective management planning. The WRMP also places emphasis on leakage reduction, in addition to reducing household and non-household water consumption, and enforcing universal metering by 2030. The Cambridge Water WRMP was supported by an HRA⁵⁴ which concluded that, alone, the WRMP would have LSEs upon the following European sites, if the recommended mitigation measures were not implemented:

- Ouse Washes SAC;
- Ouse Washes SPA;
- Ouse Washes Ramsar;
- Fenland SAC; and,
- Eversden & Wimpole Woods SAC.

3.5.13 WRMPs are linked to Drought Plans. Drought Plans outline the steps that water companies must take in a drought event to ensure that the population maintains access to sufficient water supplies, without detrimentally impacting rivers and the environment. The Anglian Water Drought Plan⁵⁵ and the Cambridge Water Drought Plan⁵⁶ both cover the period from 2022 to 2027 and set out a series of actions to address droughts, including actions to reduce customer demand for water and identification circumstances wherein drought orders and permits may be required.

⁵¹ Anglian Water (2023) Our Water Resources Management Plan 2024. Available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp/revised-draft-wrmp24-main-report-v2.pdf> [Date accessed: 01/07/25]

⁵² Mott MacDonald (2023) Anglian Water Revised Draft Water Resource Management Plan 2024 Environmental Report Sub-Report A: Habitats Regulations Assessment (HRA). Available at: <https://www.anglianwater.co.uk/SysSiteAssets/household/about-us/wrmp/revised-draft-wrmp24-environmental-report-sub-report-a---hra.pdf> [Accessed 20/05/25].

⁵³ Cambridge Water (2025) Final Water Resources Management Plan 2024. Available at: <https://www.cambridge-water.co.uk/media/zadnmcfe/cam-water-resources-management-plan-2024-final.pdf> [Date accessed: 01/07/25]

⁵⁴ Ricardo (2023) Habitats Regulations Assessment: Draft Water Resources Management Plan 2024. Available at: <https://www.cambridge-water.co.uk/media/twqh2ovj/cambridge-water-draft-wrmp24-hra-issue-3.pdf> [Date accessed: 01/07/25]

⁵⁵ Anglian Water (2022) Drought Plan 2022 Final Version. Available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/aws-drought-plan-2022.pdf> [Date accessed: 01/07/25]

⁵⁶ Cambridge Water (2022) Cambridge Water drought plan. Available at: <https://www.cambridge-water.co.uk/media/udchgvd1/cambridge-water-final-drought-plan-2022.pdf> [Date accessed: 01/07/25]

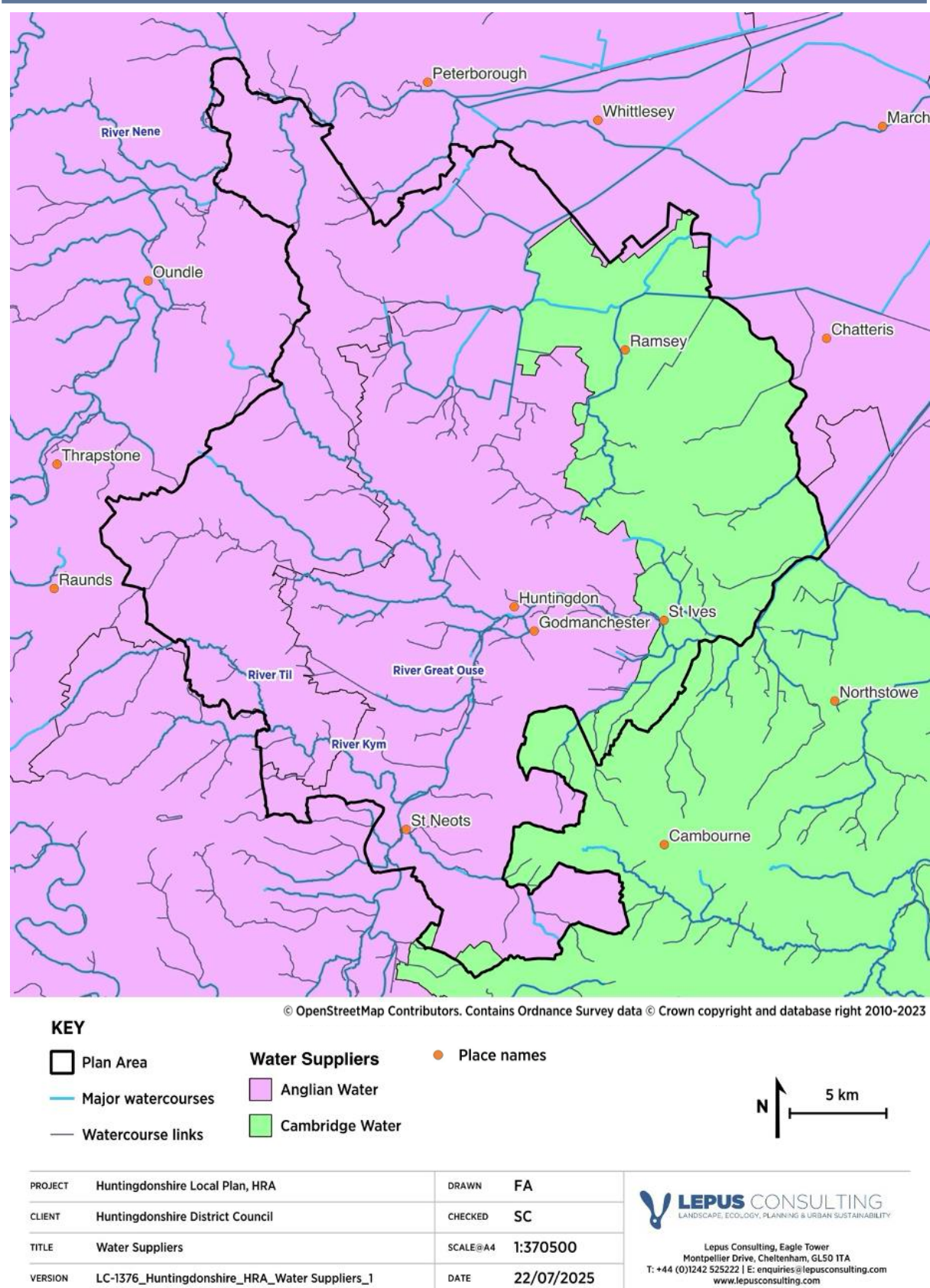


Figure 3.2: Watercourses and Water Suppliers in and around the Plan area

- 3.5.14 Anglian Water provide wastewater services for development in Huntingdonshire. Anglian Water use the term Water Recycling Centres (WRC) to refer to these services. There are 33 WRCs that are within or currently serving communities in Huntingdonshire. Twenty-nine of these are expected to serve growth from commitments or adopted plans⁵⁷. Sewerage Undertakers have a duty under Section 94 of the Water Industry Act 1991 to provide sewerage and treat wastewater arising from new domestic development⁵⁸. Environmental permits are used alongside water quality limits as a means of controlling the pollutant load discharged from a WRC to a receiving watercourse. In March 2024, Huntingdonshire District Council completed a Stage 1 Water Cycle Study⁵⁹, comprising the first stage of the Integrated Water Management Strategy (IWMS) for Huntingdonshire. This assessed headroom at WRCs serving Huntingdonshire and identified a requirement for an increase in flow permits and potential upgrades to treatment processes.
- 3.5.15 The IWMS sets out the anticipated growth of the study area up to 2046 and outlines a set of objectives for assessing future water management options. The report also highlights that, according to the latest WFD assessment data, *“all of the watercourses in the study area have moderate or poor overall status”*, largely due to *“the water industry (sewage dischargers) and agricultural and rural land management (livestock, arable and land drainage)”* and pollution from *“urban and highway runoff”*. It is stated that outputs of the EA’s SIMCAT water quality model indicate that *“watercourses within Huntingdonshire may be sensitive to increases in discharge of treated wastewater”*. A Stage 2 Water Cycle Study is currently being prepared in support of the Local Plan alongside plan preparation. Findings from the Phase 2 IWMS will inform later stages of the HRA and plan-making process.

⁵⁷ Huntingdonshire District Council (2024) Huntingdonshire Integrated Water Management Strategy: Stage 1 Water Cycle Study Final Report. Available at: <https://www.huntingdonshire.gov.uk/media/ht0h2ww5/huntingdonshire-integrated-water-management-strategy-stage-1-water-cycle-study.pdf> [Date accessed: 14/07/25]

⁵⁸ Water Industry Act – 1991. Available at: <https://www.legislation.gov.uk/ukpga/1991/56/section/94>. [Date accessed: 01/07/25]

⁵⁹ Huntingdonshire District Council (2024) Huntingdonshire Integrated Water Management Strategy: Stage 1 Water Cycle Study Final Report. Available at: <https://www.huntingdonshire.gov.uk/media/ht0h2ww5/huntingdonshire-integrated-water-management-strategy-stage-1-water-cycle-study.pdf> [Date accessed: 14/07/25]

- 3.5.16 As noted in paragraph 3.5.4, the main watercourses in the Plan area drain into The Wash Estuary, which comprises three European sites: The Wash & North Norfolk Coast SAC, The Wash SPA, and The Wash Ramsar. These sites encompass the largest embayment in the UK, as well as extensive intertidal sand and mudflats, subtidal sandbanks, biogenic and geogenic reef, saltmarsh, and a barrier beach system. These systems support populations of Common Seal (*Phoca vitulina*) and Otter (*Lutra lutra*), and provide rich foraging grounds and important roosting habitat for a number of bird species for which the SPA and Ramsar sites are designated^{60,61,62}. The species and habitats for which the three European sites are designated are sensitive to changes in water quality and quantity^{63,64,65}. As the River Great Ouse and Nene flow through and around the Plan area and discharge at The Wash, there is a possibility for activity in the Plan area to adversely affect the quality of water flowing to the three European sites. Furthermore, as the Plan area falls partly within the same ALS catchment area as the Wash (the Nene ALS catchment area), water use/extraction activity within the Plan area has the potential to adversely affect the quantity of water at the European sites. Consequently, despite their location being outside of the Plan area, it is necessary to scope The Wash & North Norfolk Coast SAC, The Wash SPA, and The Wash Ramsar into the HRA process based on hydrological impact pathways.
- 3.5.17 The northern central section of the Plan area comprises the Great Fen, which was once part of a natural fenland landscape, with a large area of open water called Whittlesey Mere dominating the north, and a mosaic of bogs, fens and wet woodland to the south⁶⁶. The Fenland SAC (where it is underpinned by Woodwalton Fen SSSI and also Woodwalton National Nature Reserve (NNR)) and Woodwalton Fen Ramsar are located within the Great Fen area (see **Figure 3.3**) and, alongside surrounding supporting habitat (see **Figure 3.4**), have significant ecological importance (**Figure 3.5**).
- 3.5.18 The Council has partnered with the EA, NE, and the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire, to carry out the Great Fen project⁶⁷. The aim of this project is to help restore the Great Fen and improve the connectivity of its habitats, ultimately aspiring to oversee the creation of a large-scale nature recovery network including the restoration of 14 square miles of wild fen over the next 50 to 100 years.

⁶⁰ Natural England (2018) European Site Conservation Objectives for The Wash & North Norfolk Coast SAC (UK0017075). Available at: <https://publications.naturalengland.org.uk/publication/5950176598425600> [Date accessed: 03/07/25]

⁶¹ JNCC (1988) Information Sheet on Ramsar Wetlands (RIS): The Wash. Available at: <https://jncc.gov.uk/jncc-assets/RIS/uk11072.pdf> [Date accessed: 03/07/25]

⁶² Natural England (2019) European Site Conservation Objectives for The Wash SPA (UK9008021). Available at: <https://publications.naturalengland.org.uk/publication/5747661105790976> [Date accessed: 03/07/25]

⁶³ Natural England (2014) Site Improvement Plan: The Wash and North Norfolk Coast (SIP245). Available at: <https://publications.naturalengland.org.uk/publication/5327498292232192> [Date accessed: 03/07/25]

⁶⁴ Natural England (2024) The Wash & North Norfolk Coast SAC, Supplementary Advice. Available at: <https://designatedsites.naturalengland.org.uk/ConservationAdvice/SupplementaryAdvice.aspx?SiteCode=UK0017075&SiteName=the+wash+&SiteNameDisplay=The+Wash+and+North+Norfolk+Coast+SAC&countyCode=29&responsiblePerson=&SeaArea=&IFCAArea=&NumMarineSeasonality=2> [Date accessed: 03/07/25]

⁶⁵ Natural England (2024) The Wash SPA, Supplementary Advice. Available at: <https://designatedsites.naturalengland.org.uk/ConservationAdvice/SupplementaryAdvice.aspx?SiteCode=UK9008021&SiteName=the%20wash%20&SiteNameDisplay=The+Wash+SPA&countyCode=29&responsiblePerson=&SeaArea=&IFCAArea=&NumMarineSeasonality=21> [Date accessed: 03/07/25]

⁶⁶ Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire, Environment Agency, Natural England, and Huntingdonshire District Council (2010) Great Fen Masterplan, March 2010. Available at: <https://www.greatfen.org.uk/sites/default/files/2019-10/env03-great-fen-masterplan-2010.pdf> [Date accessed: 16/07/25]

⁶⁷ Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire, Environment Agency, Natural England, and Huntingdonshire District Council (n.d.) About the Great Fen. Available at: <https://www.greatfen.org.uk/about-great-fen> [Date accessed: 16/07/25]

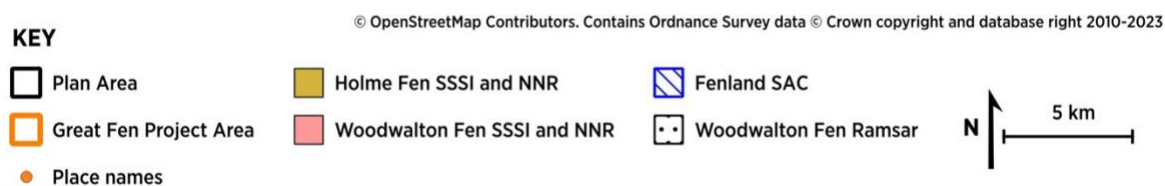
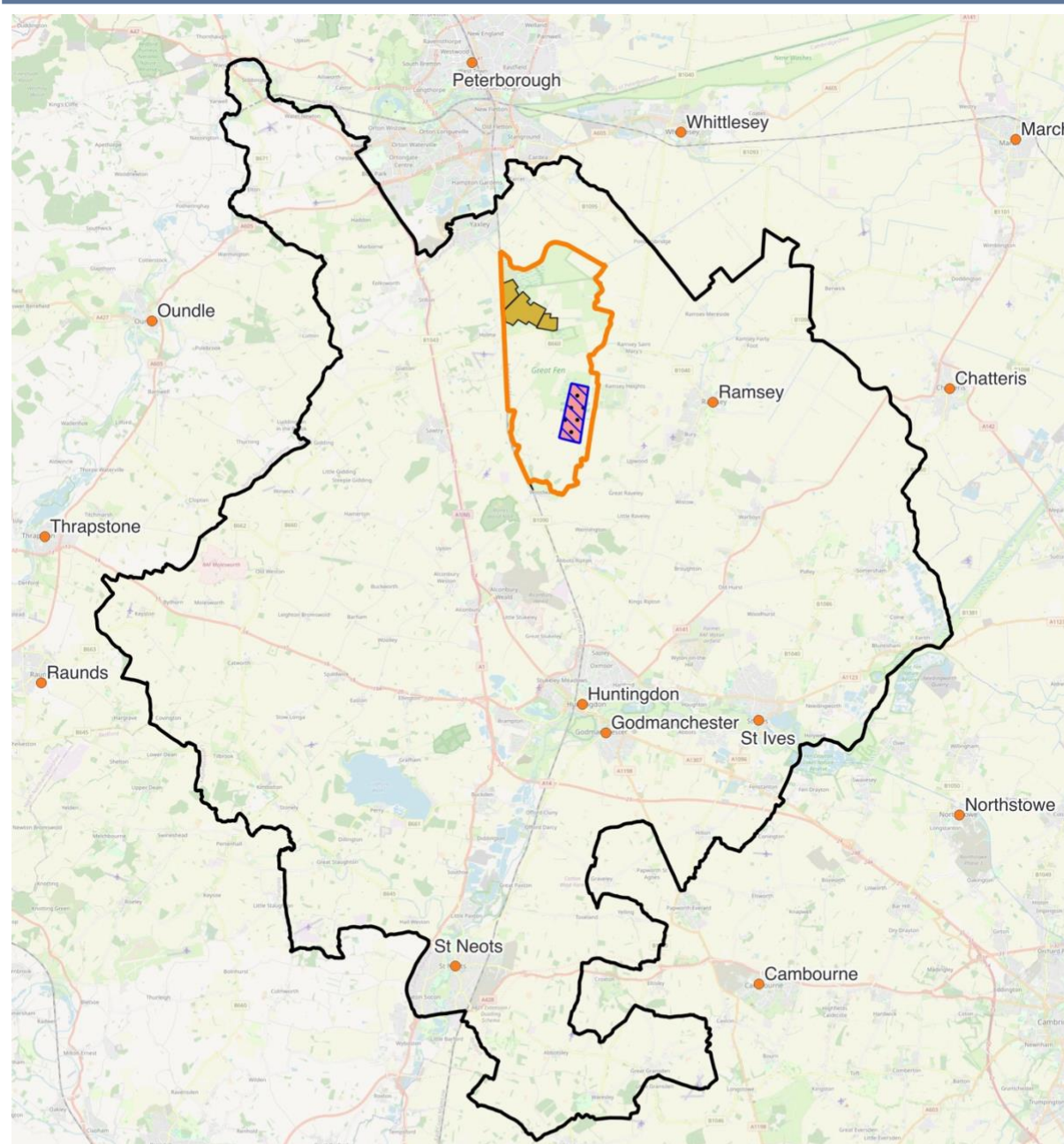
- 3.5.19 The Council has formulated the Great Fen Masterplan⁶⁸ to help achieve the aims of the Great Fen project. This masterplan advocates for the re-establishment of pastoral farming practices and promoting the occurrence of natural processes, which will benefit wildlife and locals alike. Good progress has been made to date⁶⁹ and the Local Plan should seek to facilitate further progress by aligning with the aims of the project. This will also require consideration of the SSSIs and National Nature Reserves (NNRs) that underpin the Woodwalton Fen European sites (Woodwalton Fen SSSI and Woodwalton Fen NNR) and other parts of the Great Fen area (Holme Fen SSSI and Holme Fen NNR). These national designations (see **Figure 3.3**) play a crucial role in the wider ecological landscape through provision of functional linkages and processes. Woodwalton Fen NNR supports many important species, including over 1,000 beetle species (of which over 200 are rare), over 900 species of moths and butterflies, over 400 species of wildflowers, and birds such as the Marsh Harrier (*Circus aeruginosus*)⁷⁰. Holme Fen NNR also supports numerous species of birds, including the Nightingale (*Luscinia megarhynchos*) and the Long-eared Owl (*Asio otus*), as well as Dragonflies (*Anisoptera*), around 450 species of fungi, and an extensive Birch (*Betula*) population⁷¹.
- 3.5.20 The features of the Great Fen, including the qualifying features of Fenland SAC (where it is underpinned by Woodwalton Fen SSSI) and Woodwalton Fen Ramsar (**Appendix B**) and surrounding areas of supporting habitat, are dependent on wetland habitats which are reliant on surface and/or groundwater. Therefore, maintaining the quality and quantity of water supply is critical to these designations. These European sites, and areas of surrounding functionally linked habitat across the Great Fen area, are, therefore, scoped into the HRA process in terms of water quality and water quantity impacts.

⁶⁸ Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire, Environment Agency, Natural England, and Huntingdonshire District Council (2010) Great Fen Masterplan, March 2010. Available at: <https://www.greatfen.org.uk/sites/default/files/2019-10/env03-great-fen-masterplan-2010.pdf> [Date accessed: 16/07/25]

⁶⁹ Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire, Environment Agency, Natural England, and Huntingdonshire District Council (n.d.) Progress towards the Great Fen vision. Available at: <https://www.greatfen.org.uk/about-great-fen/restoration-project-progress> [Date accessed: 16/07/25]

⁷⁰ Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire, Environment Agency, and Natural England, and Huntingdonshire District Council (n.d.) Sites to Visit – Nature Reserve, Woodwalton Fen. Available at: <https://www.greatfen.org.uk/woodwalton-fen> [Date accessed: 16/07/25]

⁷¹ Woodland Trust (n.d.) Holme Fen. Available at: <https://www.woodlandtrust.org.uk/visiting-woods/woods/holme-fen/> [Date accessed: 16/07/25]



PROJECT	Huntingdonshire Local Plan, HRA	DRAWN	FA
CLIENT	Huntingdonshire District Council	CHECKED	SC
TITLE	Great Fen Project Area	SCALE@A4	1:362100
VERSION	LC-1376_Huntingdonshire_HRA_Great Fen Area_3	DATE	30/07/2025

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Figure 3.3: Great Fen project area and relevant biodiversity designations

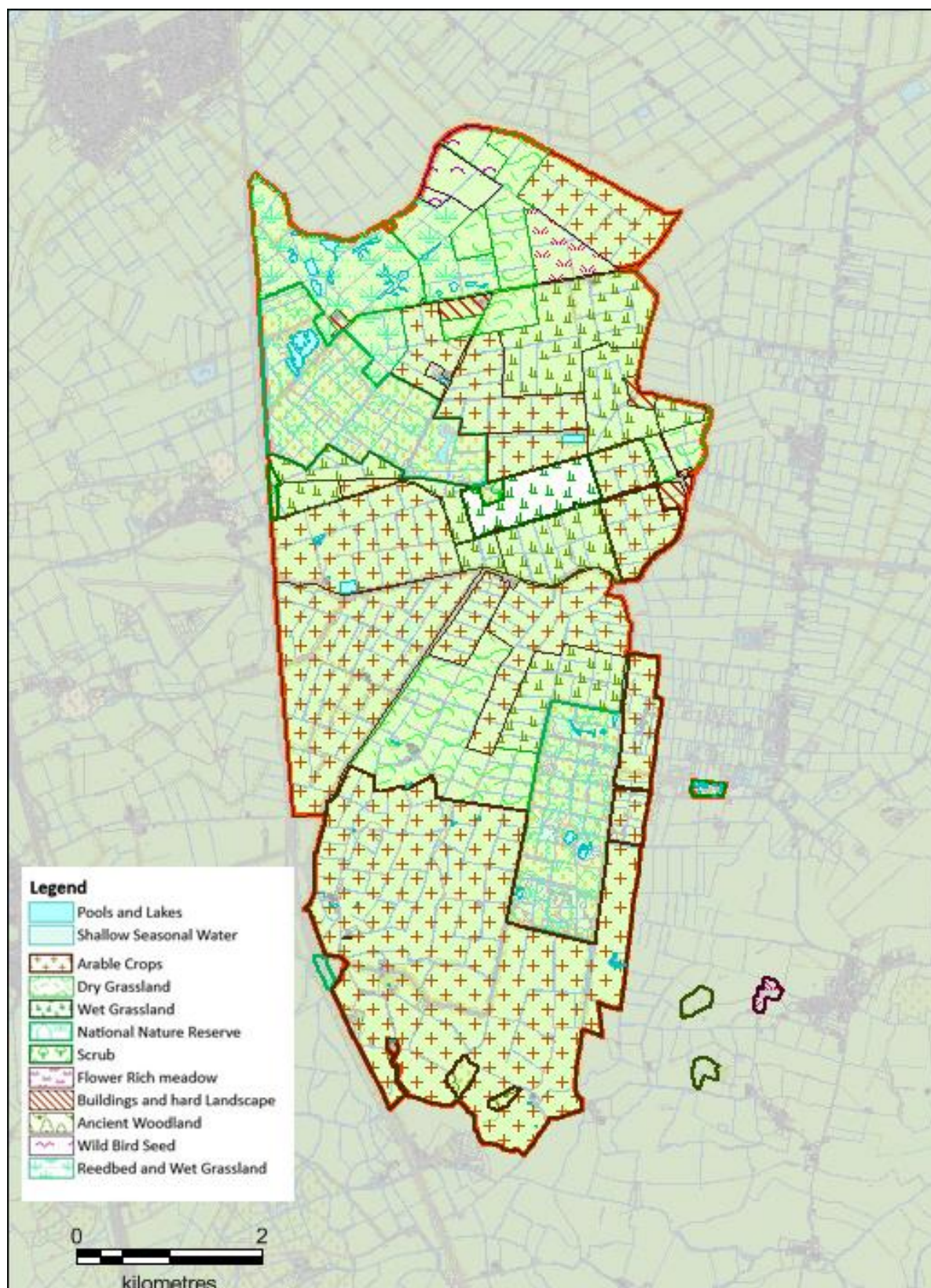


Figure 3.4: Habitats in the Great Fen area identified by Huntingdonshire District Council⁷²

⁷² Huntingdonshire District Council (n.d.) Great Fen Masterplan Maps, Habitats. Available at: <https://www.huntingdonshire.gov.uk/planning/planning-policy-documents/great-fen-masterplan-maps/> [Date accessed: 16/07/25]

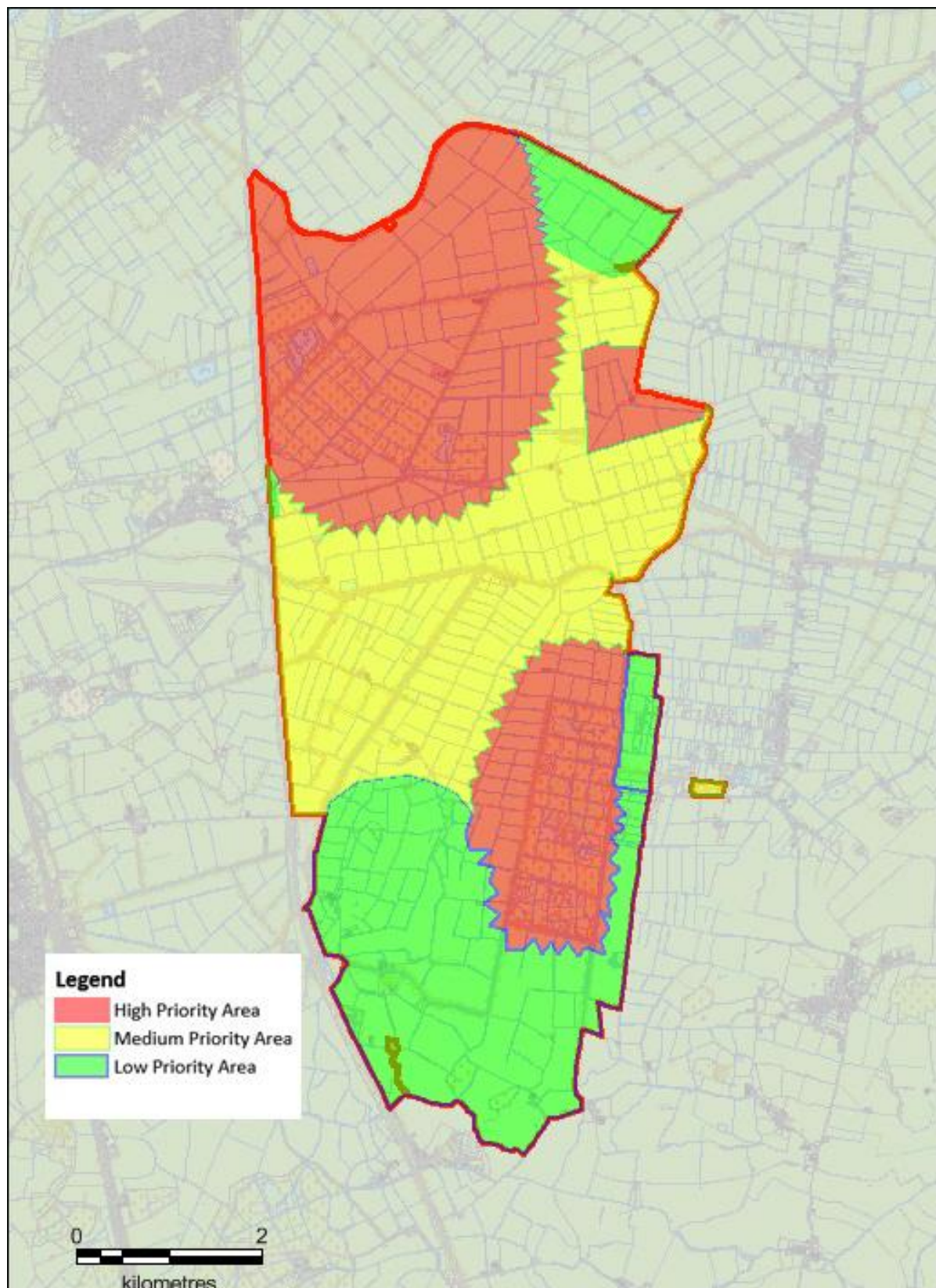


Figure 3.5: Ecological priority areas identified by Huntingdonshire District Council⁷³

⁷³ Huntingdonshire District Council (n.d.) Great Fen Masterplan Maps, Ecological Priorities. Available at: <https://www.huntingdonshire.gov.uk/planning/planning-policy-documents/great-fen-masterplan-maps/> [Date accessed: 16/07/25]

- 3.5.21 Taking into consideration potential changes in water supply (through abstraction for water supply) and water quality (through surface water run-off and discharges from WwTWs), European sites were screened for potential hydrological impact pathways. This review looked at European sites which are hydrologically linked to the Plan area and hydrologically sensitive, including impacts upon functionally linked watercourses. **Table 3.2** indicates those European sites that will be scoped into the screening assessment for further consideration in the HRA process based on hydrological impact pathways.

Table 3.2: Assessment of hydrological impact pathways for European sites within the influence of the Local Plan

European sites with hydrological links to the Plan area	Potential water quality LSEs	Potential water quantity LSEs	Will the European site be scoped in for further assessment in the HRA process?
Fenland SAC ⁷⁴	Fenland SAC is designated for its calcareous fen and meadow habitats, which support populations of Spined Loach (<i>Cobitis taenia</i>) and Great Crested Newt (<i>Triturus cristatus</i>). Fenlands are notably sensitive to changes in water quality, with changes to nutrient levels and water chemistry easily able to offset the balance of the ecosystem ⁷⁵ . The SAC is located within the Plan area; therefore, development under the Local Plan has the potential to adversely affect the SAC through changes to water quality. As such, the site is scoped in for further consideration in the HRA process based upon water quality impact pathways.	Fenland SAC (and the northern half of the Plan area) is located within the Old Bedford including the Middle Level ALS catchment area. The ALS ⁷⁶ concluded that <i>“licensed abstraction has such a small influence on water levels in Woodwalton Fen that they can be shown not to have an adverse effect on the integrity of the site”</i> . However, the Great Fen area (specifically the Woodwalton Fen area) has been identified as vulnerable to changes to water levels via flooding ⁷⁷ , which may become more prevalent as a result of decreased permeability of land associated with development under the Local Plan. Fenlands are highly sensitive to changes in water quantity ⁷⁸ ; hence, activity within the Plan area has the potential to threaten the status of the fenland habitats and supported species. Therefore, the SAC is scoped into the HRA process for water quantity impact pathways.	Yes

⁷⁴ Fenland SAC is split across three components which lie 27 miles apart. The component of the SAC within 10km of the Plan area is underpinned by Woodwalton Fen SSSI.

⁷⁵ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Fenland (SAC) Site Code: UK0014782. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0014782.pdf> [Date accessed: 03/07/25]

⁷⁶ Environment Agency (2017) Old Bedford including Middle Level abstraction licensing strategy. Available at: https://assets.publishing.service.gov.uk/media/5a82f227ed915d74e62386d3/ALS_2017_Old_Bedford.pdf [Date accessed: 04/07/25]

⁷⁷ Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire, Environment Agency, Natural England, and Huntingdonshire District Council. Big Ideas: Flood Protection. Available at: <https://www.greatfen.org.uk/big-ideas/flood-protection#:~:text=Flooding%20is%20a%20particular%20risk,areas%20are%20below%20sea%20level.> [Date accessed: 22/07/25]

⁷⁸ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Fenland (SAC) Site Code: UK0014782. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0014782.pdf> [Date accessed: 03/07/25]

European sites with hydrological links to the Plan area	Potential water quality LSEs	Potential water quantity LSEs	Will the European site be scoped in for further assessment in the HRA process?
Nene Washes SAC	Nene Washes SAC ⁷⁹ is designated for supporting the Spined Loach, which is sensitive to changes in water quality. The site is located approximately 2.1km north of the Plan area and is hydrologically connected to the Plan area via the River Nene and its tributaries. As such, the site is scoped in for further consideration in the HRA process based upon water quality impact pathways.	Nene Washes SAC is located within the Nene ALS catchment area. Whilst northern and eastern parts of the Plan area do also fall within the Nene ALS catchment area, the SAC was not identified as vulnerable to changes in water levels as a result of abstraction in the Nene ALS ⁸⁰ . Therefore, the site is scoped out of the HRA process for water quantity impact pathways.	Yes
Nene Washes SPA	Nene Washes SPA ⁸¹ is designated for supporting numerous breeding and non-breeding bird species, such as the Northern Shoveler (<i>Anas clypeata</i>), which are sensitive to changes in water quality. The site is located approximately 2.1km north of the Plan area and is hydrologically connected to the Plan area via the River Nene and its tributaries. As such, the site is scoped in for further consideration in the HRA process based upon water quality impact pathways.	Nene Washes SPA is located within the Nene ALS catchment area and identified as vulnerable to changes in water levels as a result of abstraction in the Nene ALS. The Nene ALS catchment area covers some of the northern and eastern parts of the Plan area; hence, increased abstraction rates to serve development within the Plan area may adversely affect the water levels of the supporting habitat upon which bird species, such as the Northern Shoveler for which the site is designated, rely. As such, the site is scoped into the HRA process for water quantity impact pathways.	Yes

⁷⁹ Natural England (2018) European Site Conservation Objectives for Ouse Washes SAC (UK0013011). Available at: <https://publications.naturalengland.org.uk/publication/4894882430713856> [Date accessed: 02/07/25]

⁸⁰ Environment Agency (2021) Nene Catchment Abstraction Licensing Strategy. Available at: <https://assets.publishing.service.gov.uk/media/606d91e28fa8f57359cf4346/CAMS-Nene-Catchment-Abstraction-Management-Strategy.pdf> [Date accessed: 04/07/25]

⁸¹ Natural England (2019) European Site Conservation Objectives for Nene Washes SPA (UK9008031). Available at: <https://publications.naturalengland.org.uk/publication/4894064390438912> [Date accessed: 02/07/25]

European sites with hydrological links to the Plan area	Potential water quality LSEs	Potential water quantity LSEs	Will the European site be scoped in for further assessment in the HRA process?
Nene Washes Ramsar	Nene Washes Ramsar ⁸² is designated for supporting “ <i>an assemblage of nationally rare breeding birds</i> ”, “ <i>a wide range of raptors</i> ”, “ <i>several nationally scarce plants</i> ”, “ <i>two vulnerable and two rare British Red Data Book invertebrate species</i> ” and the Tundra Swan (<i>Cygnus columbianus bewickii</i>). Many of these qualifying species are sensitive to changes in water quality. The site is located approximately 2.1km north of the Plan area and is hydrologically connected to the Plan area via the River Nene and its tributaries. As such, the Ramsar is scoped in for further consideration in the HRA process based upon water quality impact pathways.	Nene Washes Ramsar is located within the Nene ALS catchment area, which covers some of the northern and eastern parts of the Plan area. As the Nene Washes SPA is identified as vulnerable to changes in water levels as a result of abstraction in the Nene ALS, it can be assumed that the Nene Washes Ramsar site is similarly vulnerable given the similarity in qualifying features. Increased abstraction rates to serve development within the Plan area may adversely affect the water levels of the supporting habitat upon which qualifying bird species rely. As such, the Ramsar is scoped into the HRA process for water quantity impact pathways.	Yes
Orton Pit SAC	Orton Pit SAC ⁸³ is designated for its calcium-rich, nutrient-poor waters and Great Crested Newt. The site is located within 600m of the Plan area’s northern boundary; however, the only waterbody proximate to the site (Stanground Lode) has its source downstream of the Plan area. As such, the SAC can be scoped out of the HRA process for water quality impact pathways.	The Nene ALS lists Orton Pit SAC as one of the water-dependent European sites located within the catchment area with the potential to be affected by abstraction practices. As the Plan area is partially located within the Nene ALS catchment area, additional abstraction to serve development within the area may result in changes to the water levels at Orton Pit, which could adversely affect both the habitat and species for which it is designated. Therefore, the SAC is scoped into the HRA process for water quantity impact pathways.	Yes

⁸² JNCC (1993) Information Sheet on Ramsar Wetlands (RIS): Nene Washes. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11046.pdf> [Date accessed: 03/07/25]

⁸³ Natural England (2018) European Site Conservation Objectives for Orton Pit SAC (UK0030053). Available at: <https://publications.naturalengland.org.uk/publication/5289941760212992> [Date accessed: 02/07/25]

European sites with hydrological links to the Plan area	Potential water quality LSEs	Potential water quantity LSEs	Will the European site be scoped in for further assessment in the HRA process?
Ouse Washes SAC	Ouse Washes SAC ⁸⁴ is designated for supporting the Spined Loach, which is sensitive to changes in water quality. The southern portion of the site coincides with the eastern part of the Plan area. The site is downstream of, and hydrologically connected to, the Plan area via the River Great Ouse and its tributaries. As such, the SAC is scoped in for further consideration in the HRA process based upon water quality impact pathways.	Ouse Washes SAC is located within The Old Bedford including the Middle Level ALS catchment area, adjacent to the Ouse Upper and Bedford ALS ⁸⁵ catchment area. Both ALSs consider the Ouse Washes SAC as a proximate, water-dependent site that may be affected by abstraction practices within the area. Increased abstraction rates to serve development within the Plan area (also partly located within the two ALS catchment areas) may have an impact upon the supporting habitat for the Spined Loach for which the site is designated. As such, the SAC is scoped into the HRA process for water quantity impact pathways.	Yes
Ouse Washes SPA	Ouse Washes SPA ⁸⁶ is designated for supporting numerous breeding and non-breeding bird species, such as the Northern Shoveler, which are sensitive to changes in water quality. The southern portion of the site coincides with the eastern part of the Plan area. The site is downstream of, and hydrologically connected to, the Plan area via the River Great Ouse and its tributaries. As such, the site is scoped in for further consideration in the HRA process based upon water quality impact pathways.	Ouse Washes SPA is located within The Old Bedford including the Middle Level ALS catchment area, adjacent to the Ouse Upper and Bedford ALS catchment area. Both ALSs consider the Ouse Washes SPA as a proximate, water-dependent site that may be affected by abstraction practices within the area. Increased abstraction rates to serve development within the Plan area (also partly located within the two ALS catchment areas) may have an impact upon the supporting habitat for the Northern Shoveler and other species of breeding and non-breeding birds for which the site is designated. As such, the SPA is scoped into the HRA process for water quantity impact pathways.	Yes

⁸⁴ Natural England (2018) European Site Conservation Objectives for Ouse Washes SAC (UK0013011). Available at: <https://publications.naturalengland.org.uk/publication/4894882430713856> [Date accessed: 02/07/25]

⁸⁵ Environment Agency (2017) Upper Ouse and Bedford Ouse abstraction licensing strategy. Available at: https://assets.publishing.service.gov.uk/media/5a820dd6e5274a2e87dc0e7f/ALS_2017_Upper_Ouse_and_Bedford_Ouse.pdf [Date accessed: 04/07/25]

⁸⁶ Natural England (2019) European Site Conservation Objectives for Ouse Washes SPA (UK9008041). Available at: <https://publications.naturalengland.org.uk/publication/6636062256398336> [Date accessed: 02/07/25]

European sites with hydrological links to the Plan area	Potential water quality LSEs	Potential water quantity LSEs	Will the European site be scoped in for further assessment in the HRA process?
Ouse Washes Ramsar	Ouse Washes Ramsar ⁸⁷ is designated for supporting a number of bird species, as well as relict fenland fauna and “ <i>several nationally scarce plants</i> ”, such as the Small Water Pepper (<i>Polygonum minus</i>) that is sensitive to changes in water quality. The southern portion of the site coincides with the eastern part of the Plan area. The site is downstream of, and hydrologically connected to, the Plan area via the River Great Ouse and its tributaries. As such, the site is scoped in for further consideration in the HRA process based upon water quality impact pathways.	Ouse Washes Ramsar is located within The Old Bedford including the Middle Level ALS catchment area, adjacent to the Ouse Upper and Bedford ALS catchment. Both ALSs consider the Ouse Washes Ramsar as a proximate, water-dependent site that may be affected by abstraction practices within the area. Increased abstraction rates to serve development within the Plan area (also partly located within the two ALS catchment areas) may have an impact upon the supporting habitat for the Small Water Pepper and other aquatic species for which the site is designated. As such, the Ramsar is scoped into the HRA process for water quantity impact pathways.	Yes
Portholme SAC	Portholme SAC ⁸⁸ , designated for its lowland hay meadows, is located within the centre of the Plan area, surrounded by numerous tributaries of the River Great Ouse. The site is identified in NE’s SIP ⁸⁹ and Supplementary Advice ⁹⁰ documents as vulnerable to changes in water quality from the floodwaters arising from the River Great Ouse, which may be impacted by development occurring through the Local Plan. As such, the SAC is scoped in for further consideration in the HRA process based upon water quality impact pathways.	Portholme SAC is located within the Ouse Upper and Bedford ALS catchment area and is identified in the associated ALS as vulnerable to changes in water levels as a result of abstraction activity in the area. Approximately half of the Plan area falls within this ALS catchment area. Therefore, the SAC is scoped into the HRA process based upon water quantity impact pathways as the meadows may be adversely affected by changes to water levels due to increased abstraction to serve development allocated under the Local Plan.	Yes

⁸⁷ JNCC (1976) Information Sheet on Ramsar Wetlands (RIS): Ouse Washes. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11051.pdf> [Date accessed: 03/07/25]

⁸⁸ Natural England (2018) European Site Conservation Objectives for Portholme SAC (UK0030054). Available at: <https://publications.naturalengland.org.uk/publication/4802651548024832> [Date accessed: 02/07/25]

⁸⁹ Natural England (2014) Site Improvement Plan: Portholme SAC (SIP177). Available at: <https://publications.naturalengland.org.uk/publication/6533964571344896> [Date accessed: 02/07/25]

⁹⁰ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Portholme Special Area of Conservation (SAC) Site Code: UK0030054. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030054.pdf> [Date accessed: 02/07/25]

European sites with hydrological links to the Plan area	Potential water quality LSEs	Potential water quantity LSEs	Will the European site be scoped in for further assessment in the HRA process?
The Wash & North Norfolk SAC	Two of the main waterbodies in and around the Plan area (the River Great Ouse and River Nene) discharge at The Wash Estuary, where The Wash & North Norfolk SAC is located. The SAC ⁹¹ is designated for numerous habitats (such as intertidal sandbanks and mudflats) and species (such as the Common Seal (<i>Phoca vitulina</i>) and Otter (<i>Lutra lutra</i>)) that are noted as sensitive to changes in water quality ^{92,93} . As such, the site is scoped in for further consideration in the HRA process based upon water quality impact pathways.	The Wash & North Norfolk Coast SAC lies partly within the Nene ALS catchment area. The site is identified as vulnerable to changing water levels due to abstraction practices within the area ⁹⁴ . Increased abstraction rates to serve development within the Plan area (also partly located within this ALS catchment) has potential to alter water levels at the site, adversely affecting the status of the water-dependent habitats and supporting species for which it is designated. The Ouse Upper and Bedford ALS also identified vulnerability to changing water levels due to abstraction practices within this catchment area (which covers approximately half of the Plan area). Therefore, the SAC is scoped into the HRA process based upon water quantity impact pathways.	Yes

⁹¹ Natural England (2018) European Site Conservation Objectives for The Wash & North Norfolk Coast SAC (UK0017075). Available at: <https://publications.naturalengland.org.uk/publication/5950176598425600> [Date accessed: 03/07/25]

⁹² Natural England (2014) Site Improvement Plan: The Wash and North Norfolk Coast (SIP245). Available at: <https://publications.naturalengland.org.uk/publication/5327498292232192> [Date accessed: 03/07/25]

⁹³ Natural England (2024) The Wash & North Norfolk Coast SAC, Supplementary Advice. Available at: <https://tinyurl.com/3kzmvxch> [Date accessed: 03/07/25]

⁹⁴ Environment Agency (2021) Nene Catchment Abstraction Licensing Strategy. Available at: <https://assets.publishing.service.gov.uk/media/606d91e28fa8f57359cf4346/CAMS-Nene-Catchment-Abstraction-Management-Strategy.pdf> [Date accessed: 04/07/25]

European sites with hydrological links to the Plan area	Potential water quality LSEs	Potential water quantity LSEs	Will the European site be scoped in for further assessment in the HRA process?
The Wash SPA	Two of the main waterbodies in and around the Plan area (the River Great Ouse and River Nene) discharge at The Wash Estuary, where The Wash SPA is located. The SPA ⁹⁵ is designated for numerous breeding and non-breeding bird species (such as the Grey Plover, <i>Pluvialis squatarola</i>) that are noted as sensitive to changes in water quality ^{96,97} . As such, the site is scoped in for further consideration in the HRA process based upon water quality impact pathways.	The Wash & North Norfolk Coast SAC lies partly within the Nene ALS catchment area. The site is identified in the Nene ALS as vulnerable to changing water levels as a result of abstraction practices within the area. Increased abstraction rates to serve development within the Plan area (also partly located within this ALS catchment area) has the potential to alter water levels at the site, adversely affecting habitats of the bird species for which it is designated. The site is also identified in the Ouse Upper and Bedford ALS as vulnerable to changing water levels as a result of abstraction practices within this nearby catchment area (which covers approximately half of the Plan area). Therefore, the SPA is scoped into the HRA process based upon water quantity impact pathways.	Yes
The Wash Ramsar	Two of the main waterbodies in and around the Plan area (the River Great Ouse and River Nene) discharge at The Wash Estuary, where The Wash Ramsar is located. The Ramsar ⁹⁸ is designated for numerous breeding and non-breeding bird species (such as the Grey Plover, <i>Pluvialis squatarola</i>) that are noted as sensitive to changes in water quality ⁹⁹ . As such, the site is scoped in for further consideration in the HRA process based upon water quality impact pathways.	The Wash & North Norfolk Coast SAC lies partly within the Nene ALS catchment and is vulnerable to changing water levels as a result of abstraction practices within the area. Increased abstraction rates to serve development within the Plan area (also partly located within this ALS catchment) has potential to alter water levels at the site, adversely affecting supporting habitats for the bird species for which it is designated. The site is also identified in the Ouse Upper and Bedford ALS as vulnerable to changing water levels due to abstraction practices within this catchment area (which covers approximately half of the Plan area). Therefore, the Ramsar is scoped into the HRA process based upon water quantity impact pathways.	Yes

⁹⁵ Natural England (2018) European Site Conservation Objectives for The Wash & North Norfolk Coast SAC (UK0017075). Available at: <https://publications.naturalengland.org.uk/publication/5950176598425600> [Date accessed: 03/07/25]

⁹⁶ Natural England (2024) The Wash & North Norfolk Coast SAC, Supplementary Advice. Available at: <https://tinyurl.com/3kzmvxch> [Date accessed: 03/07/25]

⁹⁷ Natural England (2014) Site Improvement Plan: The Wash and North Norfolk Coast (SIP245). Available at: <https://publications.naturalengland.org.uk/publication/5327498292232192> [Date accessed: 03/07/25]

⁹⁸ Natural England (2018) European Site Conservation Objectives for The Wash & North Norfolk Coast SAC (UK0017075). Available at: <https://publications.naturalengland.org.uk/publication/5950176598425600> [Date accessed: 03/07/25]

⁹⁹ Natural England (2024) The Wash & North Norfolk Coast SAC, Supplementary Advice. Available at: <https://tinyurl.com/3kzmvxch> [Date accessed: 03/07/25]

European sites with hydrological links to the Plan area	Potential water quality LSEs	Potential water quantity LSEs	Will the European site be scoped in for further assessment in the HRA process?
Woodwalton Fen Ramsar	Woodwalton Fen Ramsar is designated for its fenland habitat, which supports two species of British Red Data Book plants (Fen Violet (<i>Viola persicifolia</i>) and Fen Wood-rush (<i>Luzula pallidula</i>)), as well as many wetland invertebrates, aquatic beetles, flies and moths. Fenlands are notably sensitive to changes in water quality, with changes to nutrient levels and water chemistry easily able to offset the balance of the ecosystem ^{100,101} . The site is located within the Plan area; therefore, development under the Local Plan has the potential to adversely affect the Ramsar through changes to water quality. As such, the site is scoped in for further consideration in the HRA process based upon water quality impact pathways.	Woodwalton Fen Ramsar (and the northern half of the Plan area) lies in the Old Bedford including the Middle Level ALS catchment area. Increased abstraction rates to serve development within the Plan area may cause a decline in water levels, affecting the fenland habitat and supporting species for which the site is designated. Furthermore, the Woodwalton Fen area is vulnerable to changes to water levels via flooding ¹⁰² , which may become more prevalent due to decreased permeability of land associated with development under the Local Plan. Fenlands are highly sensitive to changes in water quantity ¹⁰³ ; hence, activity within the Plan area has the potential to threaten the status of the fenland habitats and supported species. Therefore, the Ramsar is scoped into the HRA process for water quantity impact pathways.	Yes
Upper Nene Valley Gravel Pits SPA	Upper Nene Valley Gravel Pits SPA is designated for the Great Bittern, Gadwall, and European Golden Plover. The closest part of the European site to the Plan area is located approximately 3.5km from the eastern boundary. The SPA is positioned along the River Nene; however, it lies upstream of the Plan area. As such, LSEs upon water quality at the SPA are not anticipated to arise through development occurring under the Local Plan. Therefore, the SPA is scoped out of the HRA process for water quality impact pathways.	Upper Nene Valley Gravel Pits SPA is located within the Nene ALS catchment area. The site is noted as vulnerable to changing water levels due to abstraction within the Nene ALS. The Nene ALS catchment covers some of the northern and eastern parts of the Plan area. Increased abstraction rates to serve development within the Plan area may adversely affect the water levels of the habitats supporting qualifying bird species. As such, the site is scoped into the HRA process for water quantity impact pathways.	Yes

¹⁰⁰ Natural England (2014) Site Improvement Plan: Fenland SAC (SIP084). Available at: <https://publications.naturalengland.org.uk/publication/6024783481274368> [Date accessed: 03/07/25]

¹⁰¹ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Fenland (SAC) Site Code: UK0014782. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0014782.pdf> [Date accessed: 03/07/25]

¹⁰² Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire, Environment Agency, Natural England, and Huntingdonshire District Council. Big Ideas: Flood Protection. Available at: <https://www.greatfen.org.uk/big-ideas/flood-protection#:~:text=Flooding%20is%20a%20particular%20risk,areas%20are%20below%20sea%20level>. [Date accessed: 22/07/25]

¹⁰³ Ibid.

European sites with hydrological links to the Plan area	Potential water quality LSEs	Potential water quantity LSEs	Will the European site be scoped in for further assessment in the HRA process?
Upper Nene Valley Gravel Pits Ramsar	Upper Nene Valley Gravel Pits Ramsar is designated for a waterbird assemblage, including Mute Swans and Gadwall. The closest part of the European site to the Plan area is located approximately 3.5km from the eastern boundary. The Ramsar is positioned along the River Nene; however, it lies upstream of the Plan area. As such, LSEs upon water quality at the SPA are not anticipated to arise through development occurring under the Local Plan. Therefore, the SPA is scoped out of the HRA process for water quality impact pathways.	Upper Nene Valley Gravel Pits Ramsar is located within the Nene ALS catchment area. The site is noted as vulnerable to changing water levels as a result of abstraction within the Nene ALS. The Nene ALS catchment area covers some of the northern and eastern parts of the Plan area. Increased abstraction rates to serve development within the Plan area may adversely affect the water levels of the habitats supporting the qualifying bird species. As such, the site is scoped into the HRA process for water quantity impact pathways.	Yes

3.6 Recreational pressure

- 3.6.1 Increased recreational pressure at European sites can result in damage to habitats in a number of ways, including through erosion and compaction; troubling of grazing stock; causing changes in behaviour to animals such as birds at nesting and feeding sites; spreading invasive species; dog fouling; and tree climbing.
- 3.6.2 A common approach taken across the UK to address recreational impacts at European sites is to establish a buffer zone or Zone of Influence (Zol) based on detailed visitor survey data. The Zol is the area within which there are likely to be significant effects arising from recreational activities undertaken by additional residents due to growth. This is often calculated by taking the distance travelled to reach a particular site by 75% of the respondents to visitor surveys. Where available, buffer distances have been applied to determine potential pathways of recreational impacts from the Local Plan.
- 3.6.3 The broad principle of buffer zones is one component of the HRA screening process for recreational pressures. The recreational draw of a European site depends on a number of factors. These factors include the extent and range of facilities provided (in particular parking); accessibility, both within the European site and in terms of linkages to the wider area beyond the site; incorporation of a European site as part of a wider designation, such as a National Park; and promotion of the site. A review of Recreational Impact Assessments (RIAs) undertaken for other European sites across the UK indicates that visitors typically live within 4.2 km (overall median value) of nature conservation sites and that the majority (75%) live within 12.6 km¹⁰⁴. However, this review recognises that some visitors are prepared to travel longer distances to visit particular sites, for instance coastal and wetland sites.

¹⁰⁴ Weitowitz, D, C. Panter, C. Hoskin, R. and Liley, D. (2019) The effect of urban development on visitor numbers to nearby protected nature conservation sites. *Journal of Urban Ecology*, 5(1). Available at: <https://academic.oup.com/jue/article/5/1/juz019/5602629>. [Date accessed: 01/07/25]

3.6.4 As such, a precautionary distance of 15km has been applied to the scoping of European sites which may be sensitive to potential recreational impact pathways. This scoping exercise draws on a review of NE data which identifies vulnerabilities at each of the European sites located within 15km of the Plan area (**Appendix B**).

3.6.5 The following 14 European sites are located within 15km of the Plan area:

- Barnack Hills & Holes SAC;
- Eversden & Wimpole Woods SAC;
- Fenland SAC¹⁰⁵;
- Nene Washes SAC,
- Nene Washes SPA;
- Nene Washes Ramsar;
- Orton Pit SAC;
- Ouse Washes SAC,
- Ouse Washes SPA;
- Ouse Washes Ramsar;
- Portholme SAC;
- Upper Nene Valley Gravel Pits SPA;
- Upper Nene Valley Gravel Pits Ramsar; and,
- Woodwalton Fen Ramsar.

3.6.6 Barnack Hills & Holes SAC¹⁰⁶ comprises semi-natural dry grassland and scrubland habitat on calcareous substrates within a disused medieval quarry and is an important orchid site. The SAC is also designated as an NNR. The features of the SAC have been identified as vulnerable to public access and disturbance, particularly from dog walkers which are compacting the grassland and increasing nitrogen loading and the spread of negative indicator species¹⁰⁷. The HRA of the adopted Local Plan highlighted the risk of increased visitor pressure from the nearby village of Barnack¹⁰⁸. Whilst Barnack does not lie within Huntingdonshire, as the European site is located just under 5km from the Plan area's northern boundary, it is possible that residential development concentrated in the north of the district could result in an increasing number of dog walkers visiting the SAC. Therefore, Barnack Hills & Holes SAC is scoped into the HRA process for further consideration of recreational pressures.

¹⁰⁵ Fenland SAC is split across three components which lie 27 miles apart. The component of the SAC within 10km of the Plan area is underpinned by Woodwalton Fen SSSI.

¹⁰⁶ Natural England (2018) European Site Conservation Objectives for Barnack Hills & Holes SAC (UK0030031). Available at: <https://publications.naturalengland.org.uk/publication/5111783597539328> [Date accessed: 02/07/25]

¹⁰⁷ Natural England (2014) Site Improvement Plan: Barnack Hills & Holes SAC (SIP009). Available at: <https://publications.naturalengland.org.uk/publication/4529218465562624> [Date accessed: 02/07/25]

¹⁰⁸ Bodsey Ecology Limited (2017) Huntingdonshire's Local Plan to 2036 – Habitats Regulations Assessment 2017. Available at: <https://www.huntingdonshire.gov.uk/media/2684/habitats-regulations-assessment-2017.pdf> [Date accessed: 01/07/25]

- 3.6.7 The qualifying species of Eversden & Wimpole Woods SAC¹⁰⁹ is the Barbastelle Bat (*Barbastella barbastellus*). This SAC is situated approximately 4km to the west of the Plan area. Public disturbance has been identified as a threat to the SAC in the SIP^{110,111}. Public access is permitted through the woods¹¹² and it is possible that increased residential development in the Plan area will result in greater recreational pressure upon the site. As such, Eversden & Wimpole Woods SAC is scoped into the HRA process for further consideration of recreational pressures.
- 3.6.8 Nene Washes SAC¹¹³ and Ramsar¹¹⁴ are designated for supporting the Spined Loach (**Appendix B**). The Spined Loach is restricted to five east-flowing rivers in eastern England. This species appears to have limited means of dispersal; therefore, distribution records are patchy¹¹⁵. The Nene Washes SAC and Ramsar contain the highest recorded density of Spined Loach. Recreation is, however, not identified as a threat to the SAC or Ramsar for this species due to a lack of angling interest^{116,117} and, therefore, recreational impacts upon the Nene Washes SAC can be scoped out of any further assessment.
- 3.6.9 The qualifying species of the Nene Washes SPA¹¹⁸ include a number internationally important species of birds which are reliant on the Washes seasonally flooded habitat for providing breeding and wintering habitat. The Nene Washes Ramsar is also designated for Tundra Swan and a number of breeding birds, raptors and nationally scarce plants and invertebrates (**Appendix B**). The Nene Way long distance path runs along the northern bank of the River Nene, providing public access from Peterborough eastwards past Wittlesey to Ring's End. The SPA and Ramsar designations have been identified as vulnerable to disturbance caused by human activity upon bird populations, specifically through visitors engaging in recreational activities such as angling, wildfowling, bird watching and skating at the site¹¹⁹. As the SPA and Ramsar are located approximately 2km from the northern boundary of the Plan area, residential development allocated in the Plan has the potential to increase recreational pressure upon the designation; therefore, both sites are scoped into the HRA process for further consideration of this impact pathway.

¹⁰⁹ Natural England (2018) European Site Conservation Objectives for Eversden and Wimpole Woods SAC (UK0030331). Available at: <https://publications.naturalengland.org.uk/publication/6736081810620416> [Date accessed: 02/07/25]

¹¹⁰ Natural England (2015) Site Improvement Plan: Eversden and Wimpole Woods SAC (SIP078). Available at: <https://publications.naturalengland.org.uk/publication/5757354431741952> [Date accessed: 02/07/25]

¹¹¹ Natural England (2018) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features, Eversden and Wimpole Woods Special Area of Conservation (SAC) Site Code: UK0030331. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030331.pdf> [Date accessed: 02/07/25]

¹¹² Bodsey Ecology Limited (2017) Huntingdonshire's Local Plan to 2036 – Habitats Regulations Assessment 2017. Available at: <https://www.huntingdonshire.gov.uk/media/2684/habitats-regulations-assessment-2017.pdf> [Date accessed: 01/07/25]

¹¹³ Natural England (2018) European Site Conservation Objectives for Nene Washes SAC (UK0030222). Available at: <https://publications.naturalengland.org.uk/publication/5559224163631104> [Date accessed: 02/07/25]

¹¹⁴ JNCC (1993) Information Sheet on Ramsar Wetlands (RIS): Nene Washes. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11046.pdf> [Date accessed: 03/07/25]

¹¹⁵ JNCC. 1149 Spined loach *Cobitis taenia*. Available at: <https://sac.jncc.gov.uk/species/S1149/> [Date accessed: 22/07/25]

¹¹⁶ Natural England (2014) Site Improvement Plan: Nene Washes (SIP146). Available at: <https://publications.naturalengland.org.uk/publication/5376938197647360> [Date accessed: 02/07/25]

¹¹⁷ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features, Nene Washes (SAC) Site Code: UK0030222. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030222.pdf> [Date accessed: 02/07/25]

¹¹⁸ Natural England (2019) European Site Conservation Objectives for Nene Washes SPA (UK9008031). Available at: <https://publications.naturalengland.org.uk/publication/4894064390438912> [Date accessed: 02/07/25]

¹¹⁹ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features, Nene Washes (SPA) Site Code: UK9008031. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK9008031.pdf> [Date accessed: 02/07/25]

- 3.6.10 Orton Pit SAC¹²⁰ is designated for its calcium-rich, nutrient-poor waters and the Great Crested Newt. The site is privately owned with no public access; therefore, recreational impact pathways can be scoped out of the HRA process¹²¹.
- 3.6.11 The Ouse Washes SAC¹²² is designated for the Spined Loach. As set out in **paragraph 3.6.8** for the Nene Washes SAC, recreational impacts upon the Spined Loach are unlikely and this SAC can, therefore, be scoped out of the HRA process in terms of this impact pathway. The Ouse Washes SPA¹²³ is designated for supporting numerous breeding and non-breeding bird species. The Ouse Washes Ramsar¹²⁴ is also designated for supporting a number of bird species, as well as relict fenland fauna and “*several nationally scarce plants*”, such as the Small Water Pepper. The conservation of habitats at the Ouse Washes SPA is noted to be dependent on control of access and recreational activities¹²⁵. The Ouse Washes SPA and Ramsar designations extend into the eastern section of the Plan area. The Ouse Washes encompasses two canalised main river channels of the River Great Ouse that run along each side of its length, with an extensive area of wet grassland and field drains in between¹²⁶. Public access is possible along both the main river channels and the open access land in the fields between. Given the location of these designations within the Plan area, the SPA and Ramsar will be scoped into the HRA process for further consideration of recreational impacts.
- 3.6.12 Portholme SAC¹²⁷, designated for its lowland hay meadows, is located within the centre of the Plan area. The meadows have not been identified as vulnerable to recreational pressure^{128,129} in the SIP or Supplementary Advice documents provided by NE; however, in their comments on the HRA for the adopted Local Plan, NE expressed concern surrounding the sensitivity of meadow flora communities to existing recreational activities such as walking and dog walking. The SAC is open access land with three Public Rights of Way, including the Ouse Valley Way, passing through the SAC with parking provided to its immediate north. Development under the Local Plan that is concentrated within walkable and drivable distance from the SAC has the potential to increase the extent of recreational pressure. Therefore, Portholme SAC is scoped into the HRA process based upon the recreational pressure impact pathway.

¹²⁰ Natural England (2018) European Site Conservation Objectives for Orton Pit SAC (UK0030053). Available at: <https://publications.naturalengland.org.uk/publication/5289941760212992> [Date accessed: 02/07/25]

¹²¹ Froglife. Hampton Nature Reserve (Private Site). Available at: <https://www.froglife.org/what-we-do/improving-habitats/froglife-reserves/hampton-nature-reserve/> [Date accessed: 22/07/25]

¹²² Natural England (2018) European Site Conservation Objectives for Ouse Washes SAC (UK0013011). Available at: <https://publications.naturalengland.org.uk/publication/4894882430713856> [Date accessed: 02/07/25]

¹²³ Natural England (2019) European Site Conservation Objectives for Ouse Washes SPA (UK9008041). Available at: <https://publications.naturalengland.org.uk/publication/6636062256398336> [Date accessed: 02/07/25]

¹²⁴ JNCC (1976) Information Sheet on Ramsar Wetlands (RIS): Ouse Washes. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11051.pdf> [Date accessed: 03/07/25]

¹²⁵ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features, Ouse Washes (SPA) Site Code: UK9008041. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK9008041.pdf> [Date accessed: 02/07/25]

¹²⁶ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features, Ouse Washes (SPA) Site Code: UK9008041. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK9008041.pdf> [Date accessed: 02/07/25]

¹²⁷ Natural England (2018) European Site Conservation Objectives for Portholme SAC (UK0030054). Available at: <https://publications.naturalengland.org.uk/publication/4802651548024832> [Date accessed: 02/07/25]

¹²⁸ Natural England (2014) Site Improvement Plan: Portholme SAC (SIP177). Available at: <https://publications.naturalengland.org.uk/publication/6533964571344896> [Date accessed: 02/07/25]

¹²⁹ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Portholme Special Area of Conservation (SAC) Site Code: UK0030054. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030054.pdf> [Date accessed: 02/07/25]

- 3.6.13 Upper Nene Valley Gravel Pits SPA¹³⁰ and Ramsar¹³¹ comprise a series of disused sand and gravel pits along the River Nene valley which provide valuable nesting and feeding conditions for major inland concentrations of wintering water birds. Disturbance from recreation (particularly walkers and dogs) affects wintering birds at these designations by reducing the time available for feeding and increasing energy expenditure when birds take flight to avoid sources of recreational disturbance¹³². North Northamptonshire Council, West Northamptonshire Council and Bedford Borough Council jointly commissioned a study on the recreational impacts at the Upper Nene Valley Gravel Pits designations to inform the HRAs of their respective Local Plans. This project consisted of two surveys:
- Visitor Access Survey¹³³; and,
 - Bird Disturbance Survey¹³⁴.
- 3.6.14 These surveys identified bird disturbance from walkers with dogs, walkers, watersports activities, wildfowling and anglers. Visitor survey results showed that 75% of visitors on a short visit, directly from home, during the winter, lived within a 5.9km Zol of the SPA. This distance has informed a recommended zone within which new development is likely to have an adverse in-combination recreational effect upon the SPA. As the SPA and Ramsar sites are located approximately 3.5km from Huntingdonshire, the Plan area falls within this Zol. Therefore, both designations are scoped into the HRA process for further consideration of recreational impacts. Whilst none of the spatial attributes of the four Strategy Options proposed by the Council fall within 5.9km from the Upper Nene Valley Gravel Pits SPA and Ramsar, consideration will need to be given to windfall development that may come forward within this Zol over the Plan period.
- 3.6.15 Fenland SAC (where it is underpinned by Woodwalton SSSI and Woodwalton NNR)¹³⁵ and Woodwalton Ramsar¹³⁶ are located near the centre of the Plan area. The SAC is designated for its meadow and fen habitats, as well as Great Crested Newt and Spined Loach. The Ramsar is designated for Fen Violet and Fen Wood-rush, as well as numerous wetland invertebrates, aquatic beetles, flies and moths. The conservation of meadow habitats at Fenland SAC are noted to be dependent on recreation/visitor management¹³⁷. Given the location of the SAC and Ramsar within the Plan area, these designations will be scoped into the HRA process for further consideration of recreational impacts.

¹³⁰ Natural England (2019) European Site Conservation Objectives for Upper Nene Valley Gravel Pits SPA (UK9020296). Available at: <https://publications.naturalengland.org.uk/publication/5495529882517504> [Date accessed: 02/07/25]

¹³¹ JNCC (2011) Information Sheet on Ramsar Wetlands (RIS): Upper Nene Valley Gravel Pits. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11083.pdf> [Date accessed: 03/07/25]

¹³² Natural England (2014) Site Improvement Plan: Upper Nene Valley Gravel Pits SPA (SIP254). Available at: <https://publications.naturalengland.org.uk/publication/6732225261338624> [Date accessed: 02/07/25]

¹³³ Panter, C., Bishop, E. & Liley, D. (2023) Upper Nene Valley Gravel Pits Visitor Access Study. Report by Footprint Ecology for West Northamptonshire, North Northamptonshire, and Bedford Borough Council. Available at: <https://northnorthants.moderngov.co.uk/documents/s24657/Appendix%20C%20-%20Upper%20Nene%20Valley%20Gravel%20Pits%20Visitor%20Access%20Study.pdf> [Date accessed: 15/07/25]

¹³⁴ Wild Frontier Ecology (2023) Upper Nene Valley Gravel Pits SPA Bird Disturbance Study, March 2023. Available at: <https://www.wildlifebcn.org/sites/default/files/2024-03/Upper%20Nene%20Valley%20Gravel%20Pits%20Special%20Protection%20Area%20%E2%80%93%20Bird%20Disturbance%20Study%20%E2%80%93%20March%202023.pdf> [Date accessed: 17/07/25]

¹³⁵ Natural England (2018) European Site Conservation Objectives for Fenland SAC (UK0014782). Available at: <https://publications.naturalengland.org.uk/publication/6712672527581184> [Date accessed: 03/07/25]

¹³⁶ JNCC (1995) Information Sheet on Ramsar Wetlands (RIS): Woodwalton Fen. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11078.pdf> [Date accessed: 03/07/25]

¹³⁷ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Fenland (SAC) Site Code: UK0014782. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0014782.pdf> [Date accessed: 03/07/25]

- 3.6.16 Rutland Water SPA¹³⁸ and Ramsar¹³⁹ are designated for numerous breeding and non-breeding bird species. These designations lie just over 15km from the Plan area. However, advertising itself as the “*playground of the East Midlands*”¹⁴⁰, Rutland Water has a notable recreational draw and has been identified as vulnerable to associated recreational threats and pressures¹⁴¹ from a range of activities, including watersports, dog walking, cycling, golfing, fishing, and bird watching¹⁴². Given the extent of recreational draw to this European site, it has also been included for assessment in this scoping assessment. However, the HRA¹⁴³ completed to inform the Rutland Local Plan established a recreational Zol of 6-7km within which recreational impacts from new development were considered likely at Rutland Water SPA and Ramsar. The Huntingdonshire Plan area does not fall within 7km of Rutland Water, being located 15.1km to its southeast. It can, therefore, be concluded that development under the Local Plan will not increase recreational pressure upon the SPA or Ramsar site. As such, these designations have been scoped out of the HRA process based upon this impact pathway.
- 3.6.17 **Tabel 3.3** summarises European sites where recreational effects associated with the Local Plan will be considered further in the HRA process.

¹³⁸ Natural England (2023) European Site Conservation Objectives for Rutland Water SPA (UK9008051). Available at: <https://publications.naturalengland.org.uk/publication/4978639963684864> [Date accessed: 02/07/25]

¹³⁹ JNCC (1991) Information Sheet on Ramsar Wetlands (RIS): Rutland Water. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11062.pdf> [Date accessed: 03/07/25]

¹⁴⁰ Discover Rutland (n.d.) Rutland Water. Available at: <https://discover-rutland.co.uk/listing/rutland-water/> [Date accessed: 14/07/25]

¹⁴¹ Natural England (2014) Site Improvement Plan: Rutland Water SPA (SIP208). Available at: <https://publications.naturalengland.org.uk/publication/5985520903520256> [Date accessed: 02/07/25]

¹⁴² Discover Rutland (n.d.) Rutland Water. Available at: <https://discover-rutland.co.uk/listing/rutland-water/> [Date accessed: 14/07/25]

¹⁴³ Rutland County Council (2023) Local Plan 2021-2041 Habitats Regulations Assessment, Preferred Options (regulation 18) Consultation – HRA Review. Available at: <https://www.rutland.gov.uk/sites/default/files/2023-11/Preferred%20Options%20HRA%20November%202023.pdf> [Date accessed: 15/07/25]

Table 3.3: Summary of recreational impact pathways for European sites within the influence of the Local Plan

European sites within the influence of the Local Plan	Potential recreation LSEs	Will the European site be scoped in for further assessment in the HRA process?
Barnack Hills & Holes SAC	Barnack Hills & Holes SAC is also designated as a NNR and has been identified as being vulnerable to public access and disturbance. Recreation LSEs from the Local Plan are possible and will therefore be considered further in the HRA process.	Yes
Eversden & Wimpole Woods SAC	The Plan area is located within the 4km Zol of Eversden & Wimpole Woods SAC and is publicly accessible. Recreation LSEs are therefore possible and will be considered further in the HRA process.	Yes
Fenland SAC	Given the location of Fenland SAC within the Plan area, the vulnerability of its meadow and fen habitats and access at the SAC, it will be scoped into the HRA process.	Yes
Nene Washes SAC	The qualifying features of the Nene Washes SAC are not sensitive to recreational impacts. Recreational LSEs will therefore be scoped out of the HRA process.	No
Nene Washes SPA	The qualifying features of the Nene Washes SPA are sensitive to recreational impacts associated with public access. Recreation LSEs are possible and will therefore be considered further in the HRA process.	Yes
Nene Washes Ramsar	The qualifying features of the Nene Washes Ramsar are sensitive to recreational impacts associated with public access. Recreation LSEs are therefore possible and will be considered further in the HRA process.	Yes
Orton Pit SAC	There is no public access to Orton Pit SAC and therefore recreational LSEs will be scoped out of the HRA process.	No
Ouse Washes SAC	The qualifying features of the Ouse Washes SAC are not sensitive to recreational impacts. Recreational LSEs will therefore be scoped out of the HRA process.	No
Ouse Washes SPA	The qualifying features of the Ouse Washes SPA are sensitive to recreational impacts associated with public access. Recreation LSEs are possible and will therefore be considered further in the HRA process.	Yes
Ouse Washes Ramsar	The qualifying features of the Ouse Washes Ramsar are sensitive to recreational impacts associated with public access. Recreation LSEs are possible and will therefore be considered further in the HRA process.	Yes
Portholme SAC	Given the location of Portholme SAC within the Plan area, the vulnerability of its features to recreational impacts and public access at the site, this SAC will be scoped into the HRA process.	Yes
Rutland Water SPA	Given the Plan area is located outside the recreational Zol for Rutland Water, the SPA will be scoped out of the HRA process as recreational LSEs are considered unlikely.	No
Rutland Water Ramsar	Given the Plan area is outside the recreational Zol for Rutland Water, this Ramsar will be scoped out of the HRA process as recreational LSEs are considered unlikely.	No

European sites within the influence of the Local Plan	Potential recreation LSEs	Will the European site be scoped in for further assessment in the HRA process?
Upper Nene Valley Gravel Pits SPA	Given the location of the Plan area within the recreational pressure ZOI for the SPA this site will be scoped into the HRA process.	Yes
Upper Nene Valley Gravel Pits Ramsar	Given the location of the Plan area within the recreational pressure ZOI for the Ramsar this site will be scoped into the HRA process.	Yes
Woodwalton Fen Ramsar	Given the location of Woodwalton Ramsar within the Plan area, the vulnerability of its meadow and fen habitats and access at the Ramsar, it will be scoped into the HRA process.	Yes

3.7 Urbanisation effects

- 3.7.1 Urbanisation effects typically occur when development is located close to a European site boundary. Impacts may include noise disturbance, lighting effects, cat predation, fly-tipping, wildfire, littering and vandalism. Strategic mitigation schemes elsewhere in the UK have set out to limit development (i.e. avoid a net increase in residential dwellings) on the basis of site-specific evidence on how to safeguard against these impacts.
- 3.7.2 As with recreational impacts, it is common practice for urbanisation mitigation strategies in the UK to involve the implementation of a buffer zone. Typically, these zones extend around 400m from the edge of a designation. This accounts for likely impacts from pets (e.g. cat predation) and the distance from which people tend to access a site on foot. However, urbanisation effects may also take place at FLL (see definition in **paragraph 3.3.9**), which is especially relevant for European sites which are designated for species which rely on the wider landscape for activities such as feeding, commuting and foraging. For instance, certain species of birds use a variety of habitats outside the designation boundary of a European site as feeding or roosting habitat and bats may use the wider landscape for foraging and commuting. These habitats may be functionally linked where they play an important role in maintaining or restoring the population of a qualifying species at a favourable conservation status. The tests set out in the Habitats Regulations need to be applied to plans which may significantly affect FLL. This scoping exercise focuses upon European sites falling within 400m of the Plan area, but also takes FLL into consideration.
- 3.7.3 Portholme SAC is located within the Plan area, immediately south of Huntingdon and north west of Godmanchester, two of the district's towns, and also in close proximity to key roads and public transport routes. As outlined in **paragraph 3.6.12**, the grasslands for which Portholme SAC is designated are sensitive to recreational impacts, such as trampling by walkers and dog walkers. Whilst urbanisation effects, such as noise and light pollution, are unlikely to affect the conservation status of the grasslands, impacts such as fly tipping, anti-social behaviour and littering may have an impact. Given the location of Portholme SAC within the Plan area, it will be scoped into the HRA process for further consideration of urbanisation effects.

- 3.7.4 The three Ouse Washes designations are all located within 400m of the Plan area, with a small portion of each site falling within the Plan area, to the east. The Spined Loach for which Ouse Washes SAC is designated is unlikely to be adversely impacted by urbanisation effects; therefore, the SAC will be scoped out of the HRA process in terms of urbanisation effects. Many birds are particularly sensitive to urbanisation effects, such as noise and light pollution which can disrupt breeding and nesting habits¹⁴⁴. As such, the Ouse Washes SPA and Ramsar will be scoped into the HRA process based upon the urbanisation effects impact pathway.
- 3.7.5 Orton Pit SAC is located approximately 550m from the Plan area's northern boundary. Great Crested Newts for which the SAC is designated have been known to travel approximately 500m from their breeding pond habitat during the terrestrial phase of their lifecycle¹⁴⁵. Newts forage, disperse and rest on land. Depending on the location of the ponds within the SAC, the terrestrial habitat of this species may include land outside the SAC boundary. Therefore, any development within 500m of this SAC has the potential for urbanisation effects. Whilst the SAC is not accessible to the public (see **paragraph 3.6.10**), it is vulnerable to illegal activities including off-roading, vandalism, arson and disturbance from dogs jumping into ponds¹⁴⁶. Given the proximity of the SAC to the Plan area, it will be scoped into the HRA process based upon the urbanisation effects impact pathway.
- 3.7.6 Fenland SAC is designated for its meadows and fen habitats, and species including the Spined Loach and Great Crested Newt. With the exception of the Spined Loach, these qualifying features, and functionally linked habitat which supports them, has the potential to be affected by urbanisation effects due to its location in the Plan area. Great Crested Newts may be vulnerable to urbanisation effects where habitat within 500m of a breeding pond is affected (as described above in **paragraph 3.7.5**). The meadow and fen qualifying habitats may be vulnerable to impacts such as fly-tipping, anti-social behaviour and littering. Fenland SAC is, therefore, scoped into the HRA process for further consideration of urbanisation effects.

¹⁴⁴ U.S. National Science Foundation (2020) Noise and light pollution affect breeding habits in birds. Available at: <https://www.nsf.gov/news/noise-light-pollution-affect-breeding-habits-birds> [Date accessed: 15/07/25]

¹⁴⁵ Langton, T.E.S.; Beckett, C. L.; Foster, J. P. (2001) Great Crested Newt Conservation Handbook, Froglife, Halesworth. Available at: https://www.froglife.org/wp-content/uploads/2013/06/GCN-Conservation-Handbook_compressed.pdf [Date accessed: 15/07/25].

¹⁴⁶ Natural England (2014) Site Improvement Plan: Orton Pit SAC (SIP159). Available at: <https://publications.naturalengland.org.uk/publication/5570370673311744> [Date accessed: 02/07/25]

- 3.7.7 Woodwalton Fen Ramsar, which has the same geographical location as Fenland SAC (where it is underpinned by Woodwalton SSSI and Woodwalton NNR), is designated for fen habitat, invertebrates and nationally scarce plants. Research by Ganguly and Candolin (2023)¹⁴⁷ highlights the potential for artificial light at night (ALAN) to affect ecologically important invertebrates which are themselves responsible for providing key ecosystem functions. The invertebrates for which Woodwalton Fen Ramsar is designated may be adversely affected by illumination and fen habitat and plants affected by fly-tipping and littering as a result of development under the Local Plan. As such, Woodwalton Fen Ramsar is scoped into the HRA process based upon urbanisation effects. As set out in **Section 3.5**, consideration of the wider context of the Fenland SAC and Woodwalton Fen Ramsar will be of great importance during the next stages of the HRA process. These designations lie within the Great Fen area, which provides a range of habitats of significant ecological importance, and for which there are aspirations to restore and reconnect the wider landscape thorough the Great Fen Project¹⁴⁸. It is important that urbanisation effects from the Local Plan do not compromise the aims of this project and maximise restoration to ensure functionally linked and supporting habitat plays a role in their long-term conservation.
- 3.7.8 The Upper Nene Valley Gravel Pits SPA and Ramsar are not located within 400m of the Plan area; however, these designations must be considered on the basis of FLL. The SPA and Ramsar are designated for a breeding bird assemblage of lowland open waters and their margins, wintering waterbird species and an assemblage of over 20,000 waterbirds in the non-breeding season¹⁴⁹. Qualifying bird species of the Upper Nene Valley Gravel Pits SPA and Ramsar designations use a variety of habitats outside the SPA and Ramsar boundary for nocturnal and diurnal foraging and roosting. These areas of habitat are considered to be FLL. Golden Plover and Lapwing (*Vanellus vanellus*)¹⁵⁰ are qualifying features of the Upper Nene Valley Gravel Pits SPA and Ramsar designations. These species often spend time feeding or roosting on grassland, wetland and arable land outside the designation boundaries. The British Trust for Ornithology (BTO) Wetland Bird Survey (WeBS) Alert for the Upper Nene Valley Gravel Pits SPA¹⁵¹ reports that Golden Plover have shown a 76% decline since baseline analysis, (high alert, red). Lapwing, which are part of the waterbird assemblage, have shown a 45% decline since baseline analysis, and the waterbird assemblage a 26% decline (medium alert, amber).
- 3.7.9 There is limited information regarding the use of FLL by Golden Plover and Lapwing within surrounding area to the SPA. However, due to the continued decline in Golden Plover and Lapwing populations, NE has been involved in a partnership project with the Wildlife Trust in surveying and analysing potential FLL within 10km of the SPA. The mapping is based on field criteria for Golden Plover and Lapwing and historic biological records and will be progressively enhanced by additional records obtained from Golden Plover and Lapwing records in an ongoing manner¹⁵².

¹⁴⁷ Ganguly, A., Candolin, U. (2023) 'Impact of light pollution on aquatic invertebrates: Behavioural responses and ecological consequences', Behavioural Ecology and Sociobiology, 77(104), <https://doi.org/10.1007/s00265-023-03381-z>

¹⁴⁸ Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire, Environment Agency, Natural England, and Huntingdonshire District Council (n.d.) About the Great Fen. Available at: <https://www.greatfen.org.uk/about-great-fen> [Date accessed: 16/07/25]

¹⁴⁹ Natural England (2019) European Site Conservation Objectives for Upper Nene Valley Gravel Pits SPA (UK9020296). Available at: <https://publications.naturalengland.org.uk/publication/5495529882517504> [Date accessed: 02/07/25]

¹⁵⁰ Lapwing are part of the waterbird assemblage

¹⁵¹ WeBS Report Online. Available at: <https://app.bto.org/webs-reporting/alerts.jsp> [Date accessed: 28/07/25]

¹⁵² Natural England (2025) E-mail to Lepus Consulting, 25 July

- 3.7.10 The Plan area falls within 10km of the Upper Nene Valley Gravel Pits SPA and Ramsar sites. Therefore, both designated sites will be scoped into the HRA process due to potential urbanisation effects upon areas of FLL. A review of the four Strategy Options proposed by the Council reveals that spatial attributes of Strategy Options 1 and 3 fall within 10km of the Upper Nene Valley Gravel Pits SPA and Ramsar; hence, particular consideration will need to be given to urbanisation effects from development coming forward under these Options.
- 3.7.11 Whilst Eversden & Wimpole Woods SAC is not located within 400m of the Plan area, urbanisation effects upon its qualifying species, the Barbastelle Bat, have been taken into consideration. Barbastelle bats are rare within the UK, with few breeding sites currently known¹⁵³. Maternity colonies use cracks and crevices within woodlands or buildings for breeding, with caves and underground structures used for hibernation. The majority of Barbastelles tend to forage up to 7km from their woodland roosts¹⁵⁴, however, they will travel up to 20km from roost sites to reach productive hunting grounds¹⁵⁵. South Cambridgeshire District Council has published a Biodiversity Supplementary Planning Document (SPD) which identifies a key conservation area around the SAC of 5km and a 10km sustenance or wider conservation area. It is noted that the SSSI IRZs for this SAC are currently under review by NE¹⁵⁶.
- 3.7.12 Development set out in the Local Plan has the potential to disrupt FLL upon which bats rely for foraging or commuting. Potential impacts from development on FLL can include:
- Loss of / damage to roost sites;
 - Loss of flyways used for commuting/foraging;
 - Strategic loss or disruption of key flyways between different roosts;
 - Loss of/degradation to foraging habitat; and,
 - Artificial lighting and noise.
- 3.7.13 In addition to direct loss or degradation of habitat (designated or FLL), development has the potential to result in the fragmentation of connecting wildlife corridors which would hinder bat movements. Diverse habitat corridors of wetland, grassland, scrub, hedgerow and woodland habitats are also likely to provide an abundance of insects and prey upon which bats may feed. As well as being sensitive to development, bats are also vulnerable to impacts associated with renewable energy projects.

¹⁵³ Bat Conservation Trust. Barbastelle Bat. Available at: <https://www.bats.org.uk/about-bats/what-are-bats/uk-bats/barbastelle> [Date accessed: 22/07/25]

¹⁵⁴ Cambridge Approaches (2020) Barbastelle bat. Available at: <https://cambridgeapproaches.org/barbastelle-bats-are-they-important-when-considering-ewr-route/#:~:text=Barbastelles%20forage%20on%20average%20up,afield%20within%20the%20surrounding%20countryside> [Date accessed: 22/07/25]

¹⁵⁵ Natural England (2024) Definition of Favourable Conservation Status for barbastelle bat Defining Favourable Conservation Status Project. Available at: <https://publications.naturalengland.org.uk/file/5434520078385152#:~:text=Foraging%20requirements,and%20others%20009%2C%202012> [Date accessed: 23/07/25]

¹⁵⁶ Greater Cambridge Shared Planning (2022) Biodiversity Supplementary Planning Document Adopted Final February 2022. Available at: <https://www.greatercambridgeplanning.org/media/2504/qcsp-biodiversity-spd-final-copy-march-2022-1.pdf> [Date accessed: 23/07/25]

- 3.7.14 Core Sustenance Zones (CSZ), or core areas, are the defined areas surrounding bat roosts which link to connecting flightlines and foraging zones for bats¹⁵⁷. The CSZ for Barbastelle Bats is 7km. Given the Plan area lies approximately 4km from Eversden & Wimpole Woods SAC, urbanisation effects upon the SAC will be scoped in for further consideration in the HRA process. A review of the Council's four Strategy Options reveals that spatial attributes of Strategy Option 3 fall within 7km of the SAC; hence, particular consideration will need to be given to development coming forward under this Option.
- 3.7.15 **Table 3.4** summarises European sites where urbanisation effects associated with the Local Plan, either at European sites or upon areas of FLL, will be considered further in the HRA process.

Table 3.4: Summary of urbanisation impact pathways for European sites within the influence of the Local Plan (approx 400m)

European sites within the influence of the Local Plan	Potential urbanisation LSEs	Will the European site be scoped in for further assessment in the HRA process?
Eversden & Wimpole Woods SAC	Development set out in the Local Plan has the potential to have urbanisation effects upon areas of FLL associated with this SAC and it will therefore be scoped into the HRA process.	Yes
Fenland SAC	Given the location of this SAC within the Plan area urbanisation LSEs are possible, and it will therefore be scoped into the HRA process.	Yes
Orton Pit SAC	Whilst this SAC is not located within 400m of the Plan area, given its susceptibility to illicit activities it will be scoped into the HRA process.	Yes
Ouse Washes SAC	The qualifying features associated with the SAC are not vulnerable to urbanisation LSEs and this SAC will therefore be scoped out of the HRA process.	No
Ouse Washes SPA	The qualifying features of the SPA are vulnerable to urbanisation LSEs. Given its location within 400m of the Plan area this SPA will therefore be scoped into the HRA process.	Yes
Ouse Washes Ramsar	The qualifying features of the Ramsar are vulnerable to urbanisation LSEs. Given its location within 400m of the Plan area this Ramsar will therefore be scoped into the HRA process.	Yes
Portholme SAC	Given the location of Portholme SAC within the Plan area and the vulnerability of its features to urbanization impacts, this SAC will be scoped into the HRA process.	Yes
Upper Nene Valley Gravel Pits SPA	There is potential for FLL associated with this SPA designation to be present within the Plan area and therefore it will be scoped in for further consideration in the HRA process.	Yes
Upper Nene Valley Gravel Pits Ramsar	There is potential for FLL associated with this Ramsar designation to be present within the Plan area and therefore it will be scoped in for further consideration in the HRA process.	Yes
Woodwalton Fen Ramsar	Given the location of this Ramsar within the Plan area urbanisation LSEs are possible, and it will therefore be scoped into the HRA process.	Yes

¹⁵⁷ Bat Conservation Trust. Core Sustenance Zones. Available at: <https://www.bats.org.uk/our-work/landscapes-for-bats/core-sustenance-zones> [Date accessed: 22/07/25]

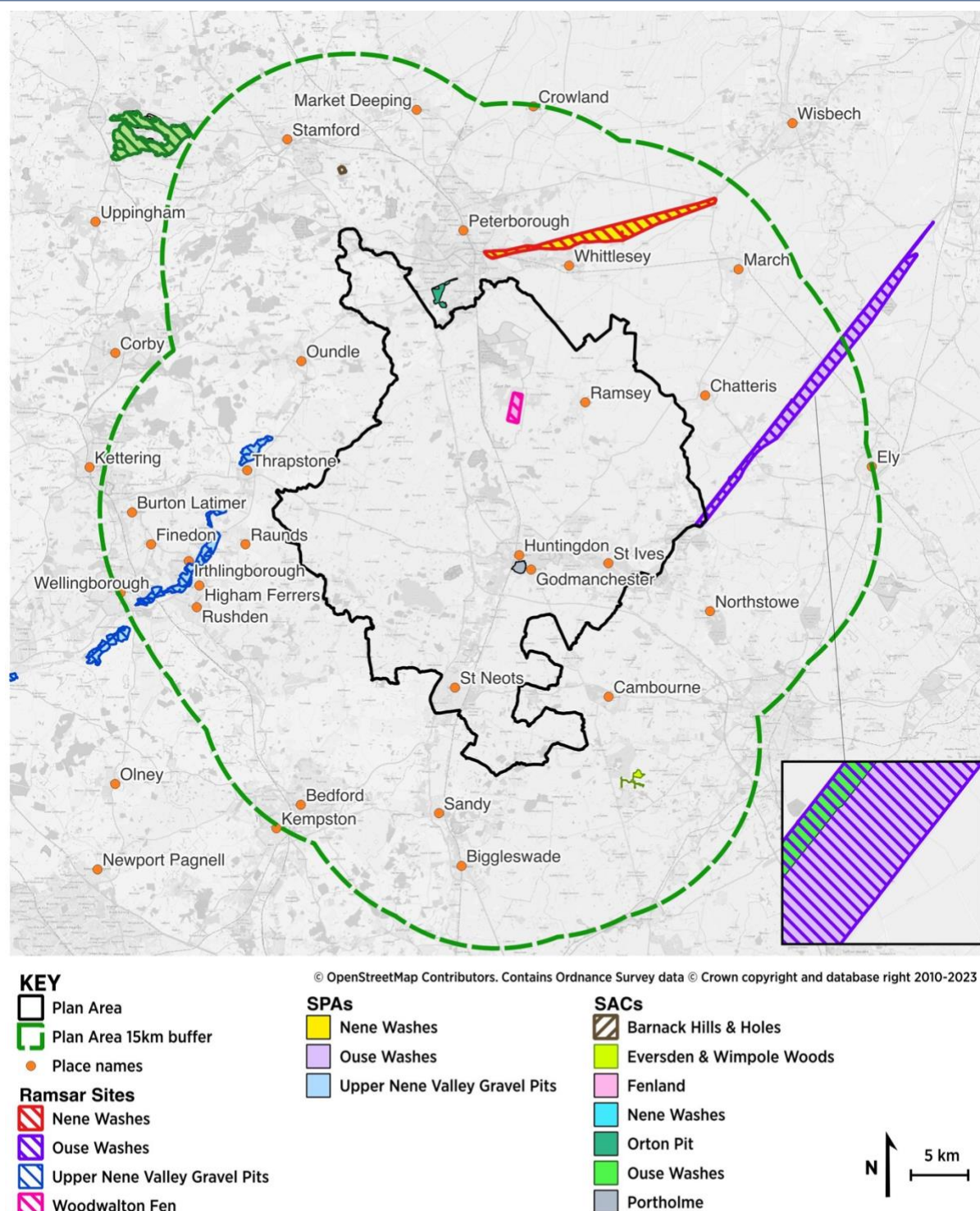
3.8 European sites threats and pressures

3.8.1 The impact pathways with potential to affect European sites are summarised in **Table 3.5**. European sites identified as vulnerable to threats and pressures will form the basis of the HRA screening process and are mapped in **Figures 3.6** and **3.7**.

Table 3.5: Summary of impact pathways to European sites which may be associated with the Local Plan

European site name	Air Pollution Impact Pathway?	Water Quality and/or Quantity Impact Pathway?	Recreational Pressure Impact Pathway?	Urbanisation Effects Impact Pathway?
Barnack Hills & Holes SAC	No	No	Yes	No
Eversden & Wimpole Woods SAC	No	No	Yes	Yes
Fenland SAC	No	Yes	Yes	Yes
Nene Washes SAC	No	Yes	No	No
Nene Washes SPA	No	Yes	Yes	No
Nene Washes Ramsar	No	Yes	Yes	No
Orton Pit SAC	Yes	Yes	No	Yes
Ouse Washes SAC	No	Yes	No	No
Ouse Washes SPA	No	Yes	Yes	Yes
Ouse Washes Ramsar	No	Yes	Yes	Yes
Portholme SAC	Yes	Yes	Yes	Yes
Rutland Water SPA	No	No	No	No
Rutland Water Ramsar	No	No	No	No
The Wash & North Norfolk Coast SAC	No	Yes	No	No
The Wash SPA	No	Yes	No	No
The Wash Ramsar	No	Yes	No	No
Upper Nene Valley Gravel Pits SPA	No	Yes	Yes	Yes
Upper Nene Valley Gravel Pits Ramsar	No	Yes	Yes	Yes

European site name	Air Pollution Impact Pathway?	Water Quality and/or Quantity Impact Pathway?	Recreational Pressure Impact Pathway?	Urbanisation Effects Impact Pathway?
Woodwalton Fen Ramsar	No	Yes	Yes	Yes

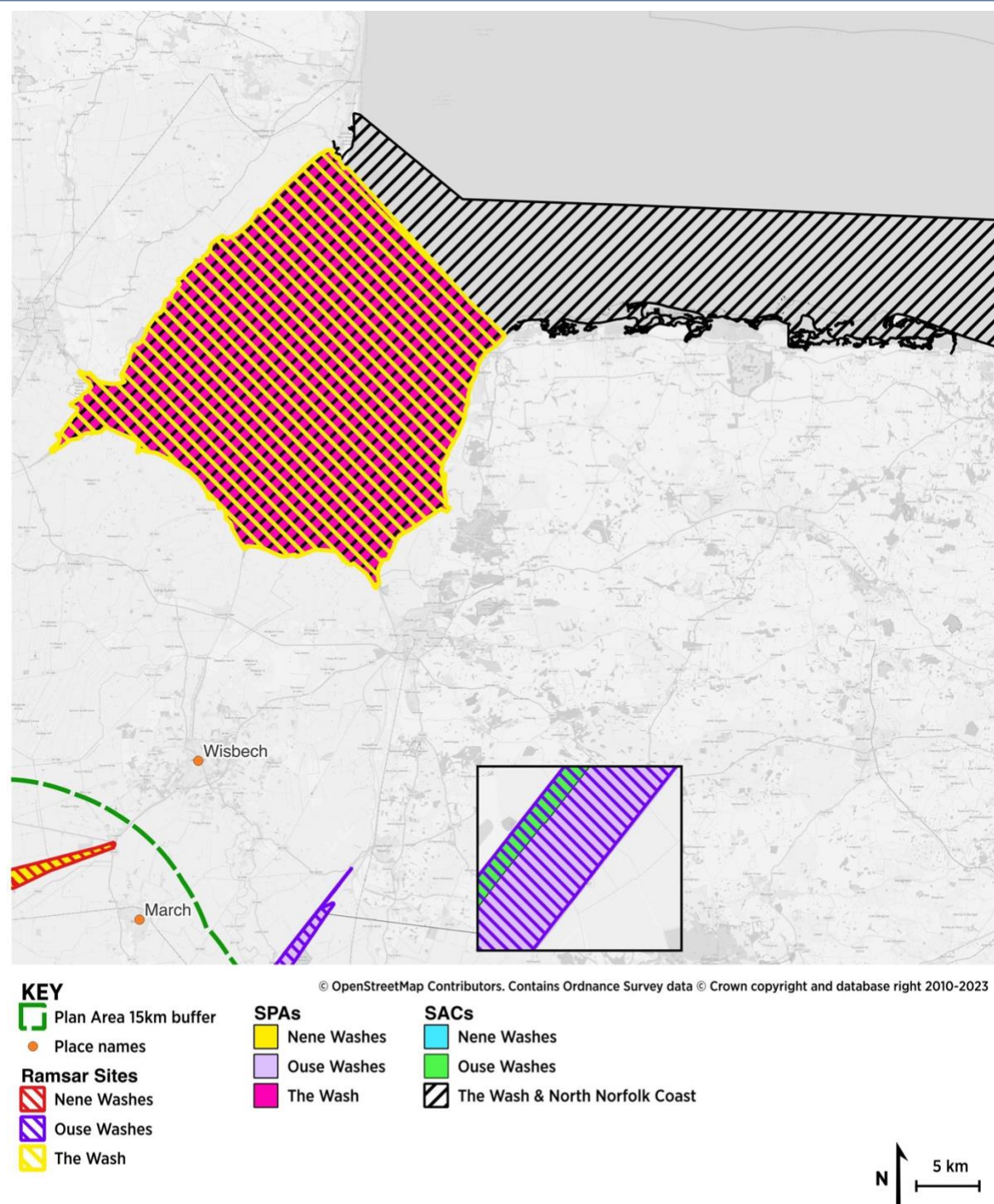


PROJECT	Huntingdonshire Local Plan, HRA	DRAWN	FA
CLIENT	Huntingdonshire District Council	CHECKED	SC
TITLE	European sites	SCALE@A4	1:664800
VERSION	LC-1376_Huntingdonshire_HRA_Biodiversity_1of2_3	DATE	25/07/2025

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Figure 3.6: European sites scoped into the HRA process (1)



PROJECT	Huntingdonshire Local Plan, HRA	DRAWN	FA
CLIENT	Huntingdonshire District Council	CHECKED	SC
TITLE	European sites	SCALE@A4	1:617100
VERSION	LC-1376_Huntingdonshire_HRA_Biodiversity_2of2_2	DATE	25/07/2025

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Figure 3.7: European sites scoped into the HRA process (2) to illustrate the location of The Wash SPA, The Wash Ramsar and The Wash & North Norfolk Coast SAC.

4 Assessment of growth strategy options

4.1 Introduction

- 4.1.1 This section of the HRA comprises a high-level assessment and comparison of the four growth strategy options being considered by the Council for the Local Plan in terms of their potential for adverse effects upon European sites. The assessment draws on information regarding threats and pressures at European sites scoped into the HRA process in **Chapter 3** of this report.

4.2 Growth strategy options

- 4.2.1 The Council is currently considering four growth strategy options to guide the allocation of sites in their emerging Local Plan. Each option is summarised below, in **Box 4.1 – 4.4**, with the sites associated with each shown in **Figures 4.1 – 4.4**.

Box 4.1: Strategy Option 1 – Strong focus on towns and cities

Strategy Option 1 – Strong focus on towns and cities

Summary of strategy

“Focusing on market towns in Huntingdonshire and proximity to Peterborough, includes Godmanchester which is close to Huntingdon, Farcet, Yaxley and Alwalton due to proximity to Peterborough and strategic sites and large-scale commercial near Peterborough. Includes Service Centres that fit with the strategy (Godmanchester and Yaxley), and also ‘Large Village’ & Village sites completely in FZ1 to satisfy the sequential test. Strategic sites include Lodge Farm, Chesterton Garden Village, Chesterton land west of the A1 option A (commercial), Nook Farm, Sibson Garden Community, East of St Neots and Brampton Cross (commercial)”

“Note there are no sites in market towns 100% FZ1 with no SWFR”

“There is a strong focus on finding sites as a priority in FZ1, then FZ 1 with minimal SWFR, then FZ1 with more substantial SWFR, then 80% FZ1 with minimal SWFR.”

Categories

1. Market Towns that fit with the strategy – Ramsey/Bury, St Ives, Huntingdon, St Neots.
 - Market Towns FZ1 SWFR minimal
 - Market Towns 80% FZ1 minimal SWFR
 - Market Town – High Flood Risk (Open Space/BNG)
 - Market Towns – High Flood Risk (Commercial)
2. Service Centres that fit with the strategy – Godmanchester, Yaxley
 - Service Centres – FZ1 minimal SWFR
 - Service Centres – 80% FZ1 minimal SWFR
3. Large Villages that fit with the strategy – Farcet, Alwalton
 - Large Village – FZ1 minimal SWFR
 - Large Village – 80% FZ1 minimal flood risk
 - High Flood risk for Open Space/BNG
4. Strategic sites that fit with the strategy - Lodge Farm, Chesterton Garden Village, Chesterton land west of the A1 option A (commercial), Nook Farm, Sibson Garden Community, Brampton Cross (commercial)
 - Strategic – 100% FZ1 minimal SWFR
 - Strategic – 80% FZ1 minimal SWFR

Strategy Option 1 – Strong focus on towns and cities

- Market Towns (Strategic) 80% FZ1 minimal SWFR
- Strategic – 74% flood zone 1
- Village – FZ1 minimal SWFR
- Village – 80% FZ1 minimal SWFR

5. Sequentially preferable sites

- Large Village – FZ1
- Village – FZ1 no SWFR

Potential plan capacity

Residential (homes): 16,084

Commercial (ha): 69.2

Commercial (sqm): 1,534,126.6

BNG/Open Space (ha): 11.54

Renewables (ha): 7.1

Care Home (ha): 0.5

Retail (sqm): 15,995

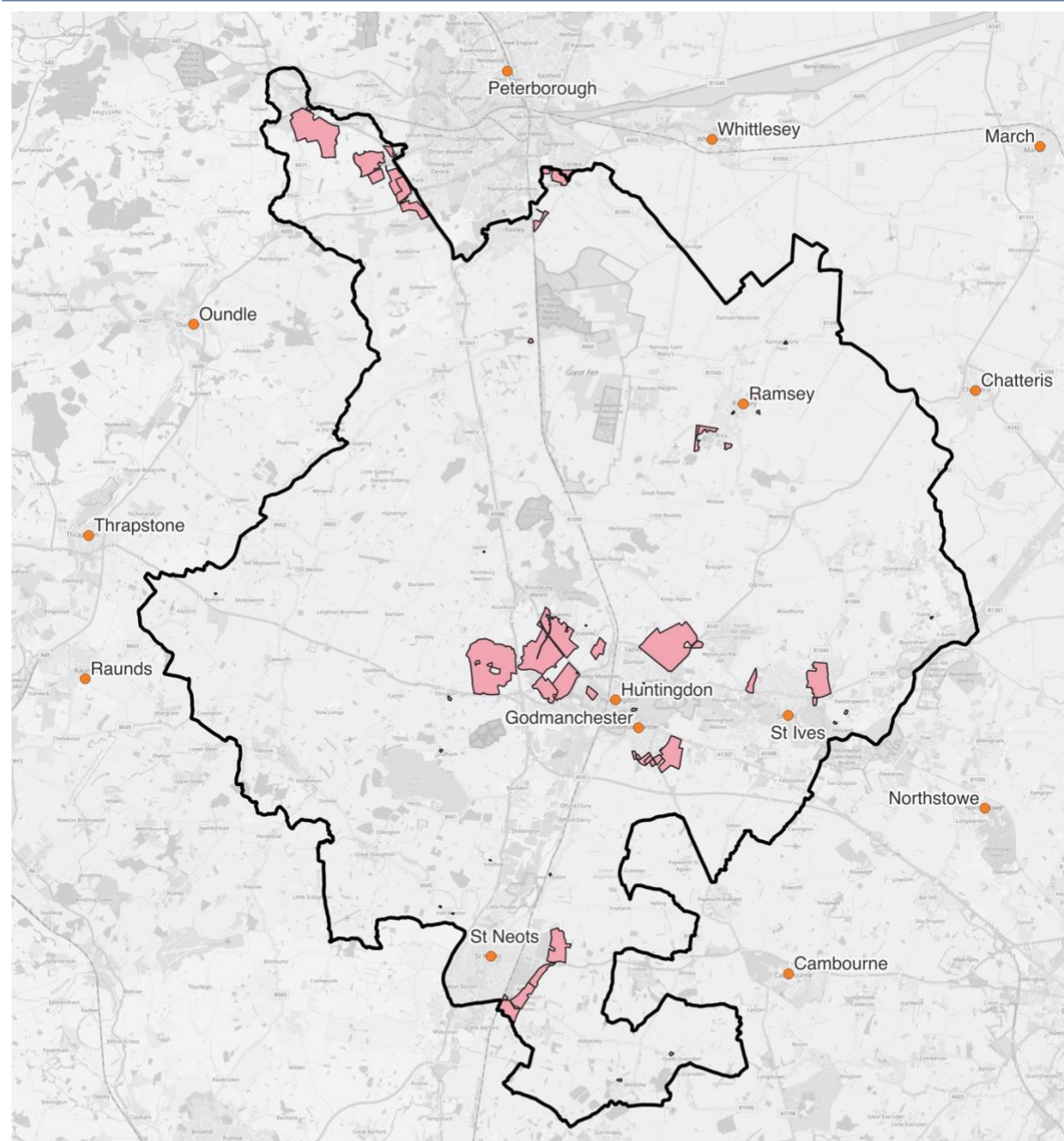
Infrastructure (ha): 2.15

Sites 1 ha or less (no.): 11

Difference from 10% buffer – 14,681

1,403

Notes: Employment numbers are provisional for the purposes of this HRA assessment. Numbers will be updated to reflect the outputs of the Economic and Employment Needs Assessment.



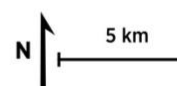
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 Plan Area

 Spatial attributes of Strategy Option 1

 Place names



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VERSION	LC-1376_Huntingdonshire_HRA_Strategy 1_1	DATE	30/07/2025

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Figure 4.1: Spatial attributes of Strategy Option 1

Box 4.2: Strategy Option 2 – Sustainable locations served by public transport, employment and infrastructure

**Strategy Option 2 – Sustainable locations served by public transport employment and infrastructure
i.e. market towns and service centres**

Summary of strategy

“Focusing on market towns in Huntingdonshire and Service Centres. Includes sites in the Service Centres of Alconbury, Bluntisham, Brampton, Godmanchester, Kimbolton, Little Paxton, Sawtry, Somersham, Stilton, Yaxley and also 'Large Village' & Village sites completely in FZ1 to satisfy the sequential test. Strategic sites include Lodge Farm, Wyton Airfield and East of St Neots.”

“Note there are no sites in market towns 100% FZ1 with no SWFR”. “There is a strong focus on finding sites as a priority in FZ1, then FZ 1 with minimal SWFR, then FZ1 with more substantial SWFR, then 80% FZ1 with minimal SWFR.”

Categories

1. Market Towns that fit with the strategy – Ramsey/Bury, St Ives, Huntingdon, St Neots.
 - Market Towns FZ1 SWFR minimal
 - Market Towns 80% FZ1 minimal SWFR
 - Market Town – High Flood Risk (Open Space/BNG)
 - Market Towns – High Flood Risk (commercial)
2. Service Centres that fit with the strategy – Alconbury, Bluntisham, Brampton, Godmanchester, Kimbolton, Little Paxton, Sawtry, Somersham, Stilton, Yaxley
 - Service Centres – FZ1 minimal SWFR
 - Service Centre – 100 FZ1 more substantial SWFR
 - Service Centres – 80% FZ1 minimal SWFR
 - Service Centres – High Flood Risk (Open Space/BNG)
 - Service Centres – High Flood Risk (existing allocations)
3. Large Villages that fit with the strategy – Farcet, Alwalton
 - Large Village – FZ1 minimal SWFR
 - Large Village – 80% FZ1 minimal flood risk
 - High Flood risk for Open Space/BNG
4. Strategic sites that fit with the strategy - Lodge Farm, Wyton Airfield
 - Strategic – 80% FZ1 minimal SWFR
 - Market Towns (Strategic) 80% FZ1 minimal SWFR
5. Sequentially preferable sites
 - Large Village – FZ1
 - Village – FZ1 no SWFR

Potential plan capacity

Residential (homes): 14,919

Commercial (ha): 38.5

Commercial (sqm): 429,155.8

BNG/Open Space (ha): 76.68

Renewables (ha): 15.836

Care Home (ha): 0.5

Retail (sqm): 15,995

Infrastructure (ha): 12.386

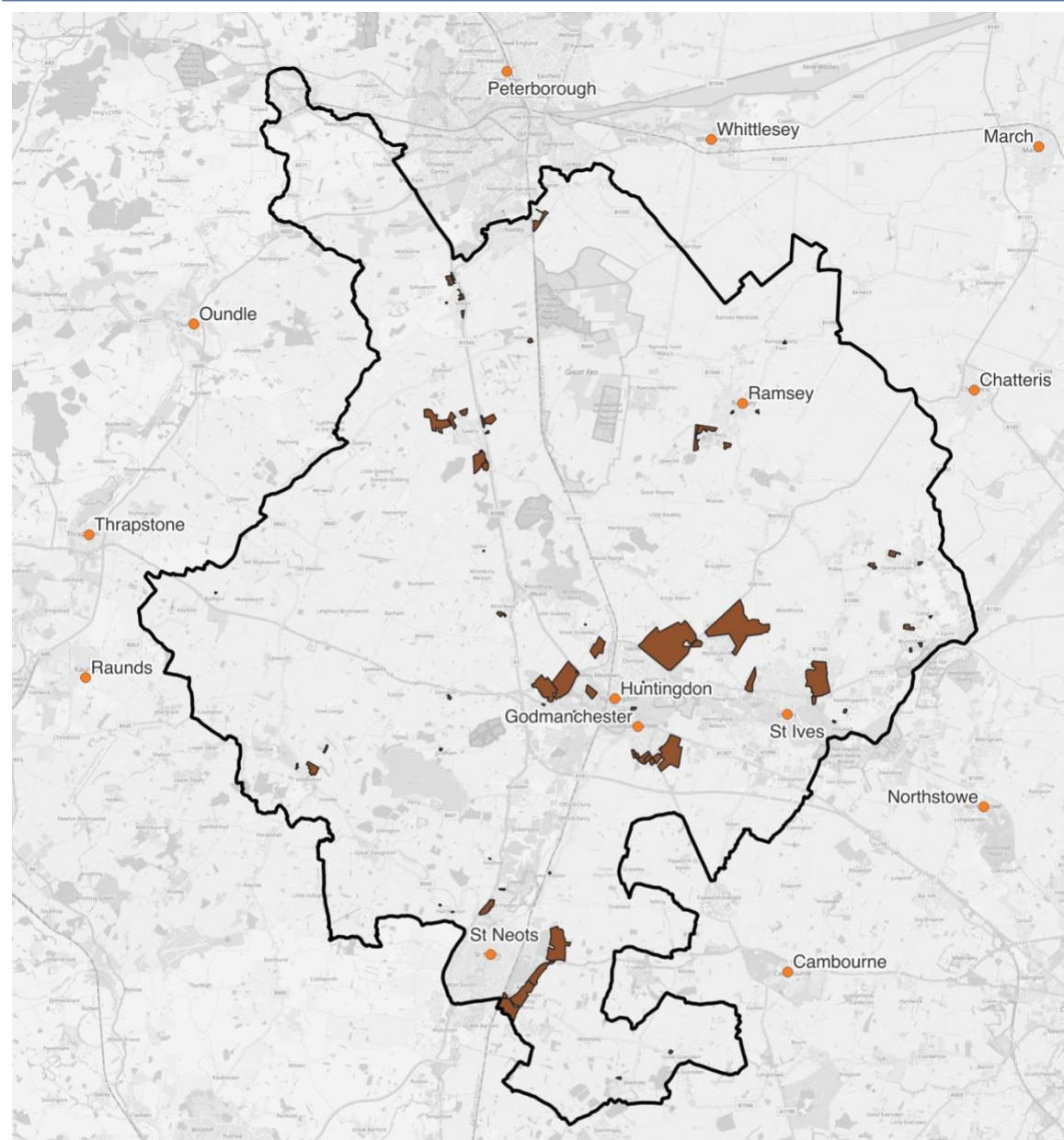
Sites 1 ha or less (no.): 15

Difference from 10% buffer – 14,681

238

**Strategy Option 2 – Sustainable locations served by public transport employment and infrastructure
i.e. market towns and service centres**

Notes: Employment numbers are provisional for the purposes of this HRA assessment. Numbers will be updated to reflect the outputs of the Economic and Employment Needs Assessment.



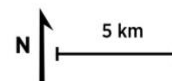
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□ Plan Area

■ Spatial attributes of Strategy Option 2

● Place names

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VERSION	LC-1376_Huntingdonshire_HRA_Strategy 2_1	DATE	30/07/2025

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Figure 4.2: Spatial attributes of Strategy Option 2

Box 4.3: Strategy Option 3 – Dispersed growth to support existing settlements

Strategy Option 3 – Dispersed growth to support existing settlements – some market town growth, but focus on service centres, large villages and villages

Summary of strategy

“Dispersed growth with some market town development in Huntingdonshire, but with more focus on the Service Centres, Large Villages and Villages. Service Centres include Alconbury, Bluntisham, Brampton, Godmanchester, Kimbolton, Little Paxton, Sawtry, Somersham, Stilton, Yaxley. Large Villages include Alwalton, Earith, Ellington, Elton, Farcet, Great Gransden, Great Paxton, Great Staughton, Hemingford Grey, Hilton, Needingworth, Pidley, Spaldwick and The Offords. Strategic sites include, Chesterton land west of the A1 option A (commercial), Lodge Farm and Wyton Airfield and East of St Neots. Sites are also identified within 23 villages. Also includes 'Large Village' & Village sites completely in FZ1 to satisfy the sequential test.”

“Note there are no sites in market towns 100% FZ1 with no SWFR”

“There is a strong focus on finding sites as a priority in FZ1, then FZ 1 with minimal SWFR, then FZ1 with more substantial SWFR, then 80% FZ1 with minimal SWFR.”

Categories

1. Market Towns that fit with the strategy – Ramsey/Bury, St Ives, Huntingdon, St Neots.
 - Market Towns FZ1 SWFR minimal
 - Market Towns 80% FZ1 minimal SWFR
2. Service Centres that fit with the strategy – Alconbury, Bluntisham, Brampton, Godmanchester, Kimbolton, Little Paxton, Sawtry, Somersham, Stilton, Yaxley
 - Service Centres – FZ1 minimal SWFR
 - Service Centre – 100 FZ1 more substantial SWFR
 - Service Centres – 80% FZ1 minimal SWFR
 - Service Centre – High Flood Risk (open space/BNG)
3. Large Villages that fit with the strategy – Alwalton, Earith, Ellington, Elton, Farcet, Great Gransden, Great Paxton, Great Staughton, Hemingford Grey, Hilton, Needingworth, Pidley, Spaldwick, The Offords
 - Large Village – FZ1
 - Large Village – FZ1 minimal SWFR
 - Large Village – FZ1 minimal SWFR
 - Large Village – 80% FZ1 minimal flood risk
 - Large Village – High Flood Risk (commercial)
 - Large Village – High Flood Risk (open space/BNG)
4. Strategic sites that fit with the strategy - Lodge Farm, Chesterton land west of the A1 option A (commercial), Wyton Airfield
 - Strategic – 100% FZ1 minimal SWFR
 - Market Towns (Strategic) 80% FZ1 minimal SWFR
 - Strategic – 80% FZ1 minimal SWFR
5. Villages that fit with the strategy (23 villages)
 - Village – FZ1 no SWFR
 - Village – FZ1 minimal SWFR
 - Village – FZ1 high SWFR >ha
 - Village – FZ1 high SWFR <ha
 - Village – 80% FZ1 minimal SWFR
 - Village – High flood risk (moorings)

Potential plan capacity

Residential (homes): 14,644

Commercial (ha): 33.94

BNG/Open Space (ha): 102.93

Strategy Option 3 – Dispersed growth to support existing settlements – some market town growth, but focus on service centres, large villages and villages

Renewables (ha): 32.636

Care Home (ha): 0.7

Retail (sqm): 0.6

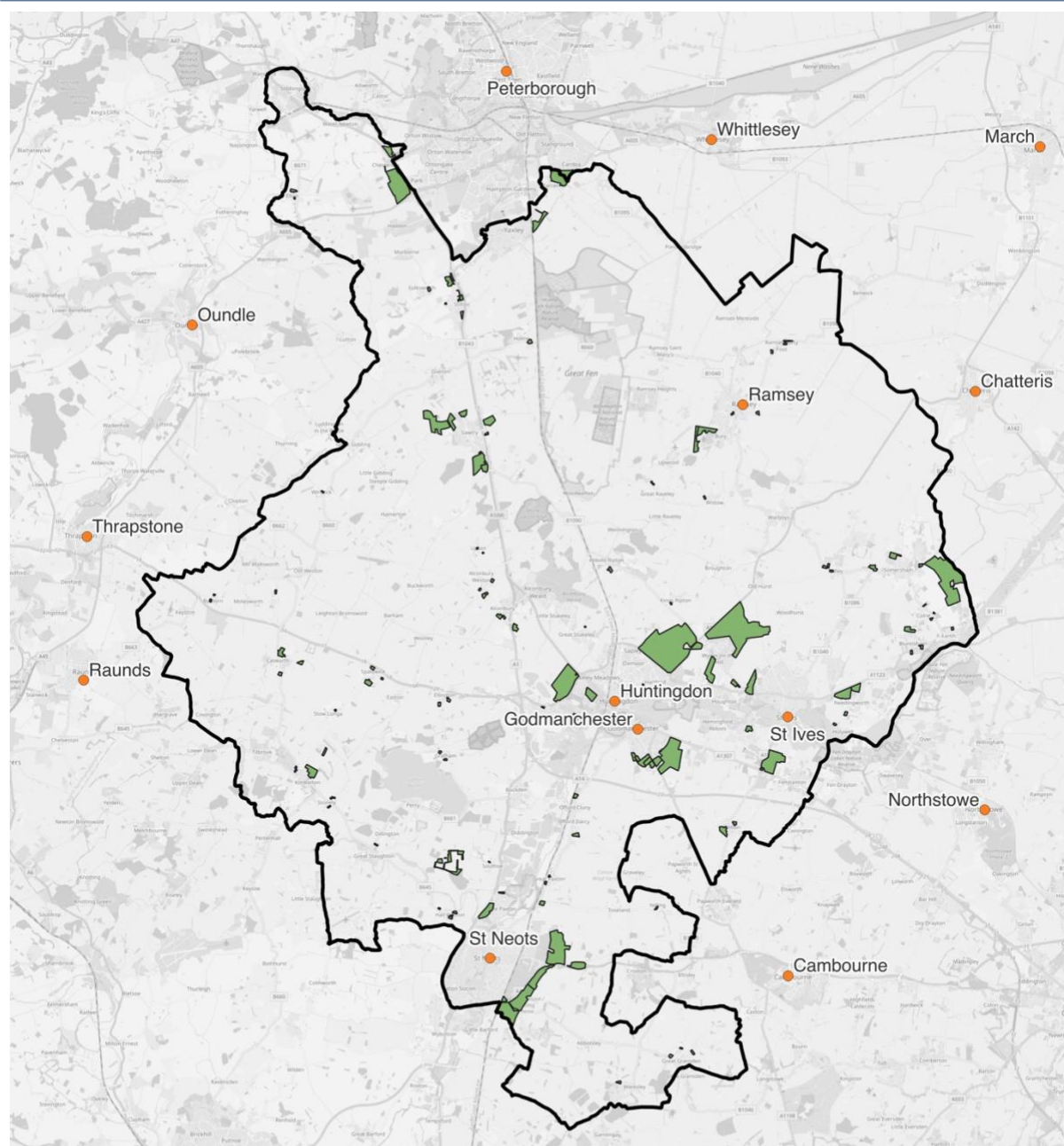
Infrastructure (ha): 10.886

Sites 1 ha or less (no.): 35

Difference from 10% buffer – 14,681

-37

Notes: Employment numbers are provisional for the purposes of this HRA assessment. Numbers will be updated to reflect the outputs of the Economic and Employment Needs Assessment.



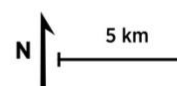
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 Plan Area

 Spatial attributes of Strategy Option 3

 Place names



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VERSION	LC-1376_Huntingdonshire_HRA_Strategy 3_1	DATE	30/07/2025

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Figure 4.3: Spatial attributes of Strategy Option 3

Box 4.4: Strategy Option 4 – Freestanding strategic developments and limited dispersed growth

Strategy Option 4 – Freestanding strategic developments and limited dispersed growth – some market town growth, but focus on freestanding strategic sites, some small freestanding sites and service centres and large villages

Summary of strategy

“Focus on freestanding strategic sites including Sapley Park Garden Village, Brampton Cross (commercial), Chesterton Garden Village & Bottom Lodge Farm (Chesterton), The Lattenbury's, Wyton Airfield and Hungary Hall Farm. Remaining development distributed in Service Centres and Large Villages with no village development. To support the freestanding strategy Colne Fen was identified for commercial leisure, Galley Hill in Fenstanton for commercial use and Midloe Grange for BNG uses.”

“Note there are no sites in market towns 100% FZ1 with no SWFR”

“There is a strong focus on finding sites as a priority in FZ1, then FZ 1 with minimal SWFR, then FZ1 with more substantial SWFR, then 80% FZ1 with minimal SWFR.”

Categories

1. Market Towns that fit with the strategy – Ramsey/Bury, St Ives, Huntingdon, St Neots.
 - Market Towns FZ1 SWFR minimal
 - Market Towns 80% FZ1 minimal SWFR
2. Service Centres that fit with the strategy – Alconbury, Bluntisham, Brampton, Godmanchester, Kimbolton, Sawtry, Somersham, Stilton
 - Service Centres – FZ1 minimal SWFR
 - Service Centre – 100 FZ1 more substantial SWFR
 - Service Centres – 80% FZ1 minimal SWFR
 - Service Centre – High Flood Risk (open space/BNG)
3. Large Villages that fit with the strategy – Earith, Ellington, Elton, Farcet, Great Gransden, Great Paxton, Hemingford Grey, Needingworth, Spaldwick, The Offords
 - Large Village – FZ1
 - Large Village – FZ1 minimal SWFR
 - Large Village – FZ1 high SWFR
 - Large Village – High Flood Risk (commercial)
 - Large Village – High Flood Risk (open space/BNG)
4. Strategic sites that fit with the strategy – Sapley Park Garden Village, Brampton Cross (commercial), Chesterton Garden Village & Bottom Lodge Farm (Chesterton), The Lattenbury's, Wyton Airfield and Hungary Hall Farm.
 - Village – FZ1 minimal SWFR
 - Strategic – 80% FZ1 minimal SWFR
 - Market Towns (Strategic) – 80% FZ1 minimal SWFR
 - Service Centres (Strategic) – 80% FZ1 minimal SWFR
5. Freestanding smaller sites - Colne Fen (commercial leisure), Galley Hill Fenstanton (commercial) and Midloe Grange (BNG).
 - Countryside – 80% FZ1 minimal SWFR
 - Countryside – High flood risk

Potential plan capacity

Residential (homes): 14,865

Commercial (ha): 66.37

Commercial (sqm): 1,211,023.6

BNG/Open Space (ha): 17.04

Renewables (ha): 8.736

Care Home (ha): 0

Strategy Option 4 – Freestanding strategic developments and limited dispersed growth – some market town growth, but focus on freestanding strategic sites, some small freestanding sites and service centres and large villages

Retail (sqm): 0.6

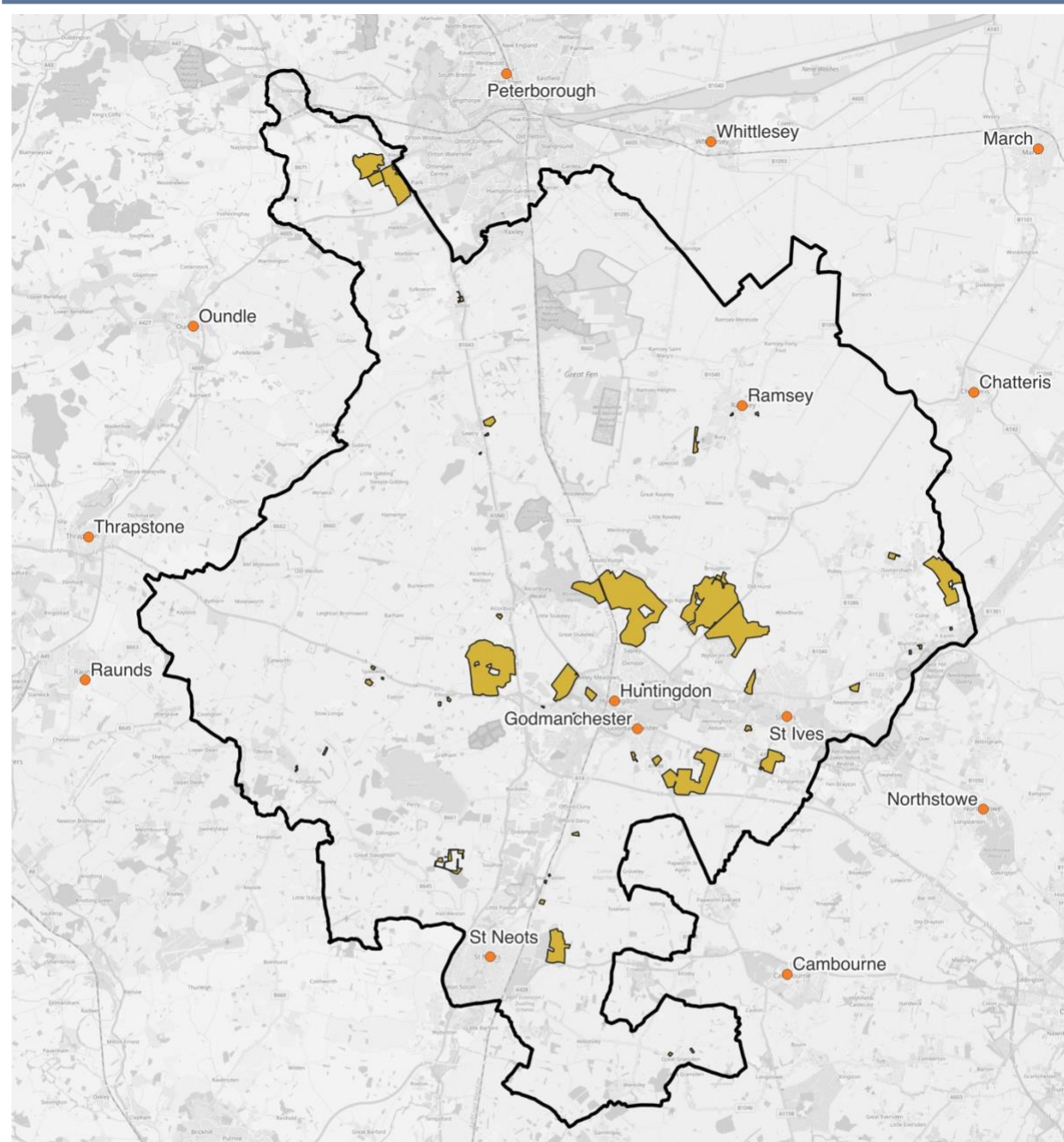
Infrastructure (ha): 10.386

Sites 1 ha or less (no.): 7

Difference from 10% buffer – 14,681

184

Notes: Employment numbers are provisional for the purposes of this HRA assessment. Numbers will be updated to reflect the outputs of the Economic and Employment Needs Assessment.



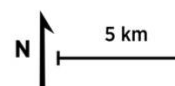
KEY

□ Plan Area

■ Spatial attributes of Strategy Option 4

● Place names

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Figure 4.4: Spatial attributes of Strategy Option 4

4.3 High-level screening exercise

Introduction

- 4.3.1 All four of the growth strategy options currently being considered by the Council (as outlined in **Section 4.2**) were subject to a high-level assessment of adverse effects upon the European sites that were scoped into the HRA process in **Chapter 3** of this report. This involved the assessment of each growth strategy as a whole, rather than assessing significant effects associated with individual sites which comprise each overall growth strategy option.

Air quality

- 4.3.2 Each of the four growth strategy options will involve the allocation of development within the Plan area for a combination of residential, commercial/industrial and mixed-use purposes. Development of this nature will result in the generation of traffic related air pollution and potential industrial point sources of air pollution during the construction and operational stages of development. Notably, development under each of the site strategy options is likely to increase the volume of traffic moving within the Plan area and along Huntingdonshire's key commuting corridors (outlined in **paragraph 3.4.7**).
- 4.3.3 Air pollution has been known to adversely affect European sites through processes such as eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides)¹⁵⁸. As such, air pollution produced as a result of the development proposed under each of the four growth strategy options has the potential to negatively affect one or more of the following two European sites identified as vulnerable to air quality impact pathways from future development within the Plan area in **Section 3.4**:
- Orton Pit SAC; and,
 - Portholme SAC.
- 4.3.4 Minimising private vehicle use, and maximising use of sustainable public transport options and active travel, can help to reduce the extent to which new development generates air pollution. As such, Strategy 2 (concentrating development around “*sustainable locations served by public transport employment and infrastructure*”) may be the best option to pursue when attempting to minimise air quality impact pathways to European sites from development. Strategy 1 (concentrating development around towns and cities) may also be a well performing option, as development around Huntingdonshire's built-up areas will maximise the number of new developments served by existing public transport infrastructure. The dispersed growth promoted under Strategies 3 and 4 is likely to result in the emission of greater quantities of air pollution during the operation stage, as sites developed under these options are less likely to be served by existing public transport networks, increasing the likelihood that new residents will rely upon private modes of transport. It is noted that Strategy 4 is predominately directing growth to freestanding strategic developments, and therefore in the early stages of development this option may perform poorly in terms of air quality, but once established and public transport links have been development it may perform more favourably than Strategy 3.

¹⁵⁸ APIS. APIENs Home. Available at: <https://www.apis.ac.uk/APIENs>. [Date accessed: 01/07/25]

4.3.5 **Box 4.5** sets out recommendations in terms of air quality

Box 4.5: Air quality recommendations

Air quality recommendations

It is recommended that the use of sustainable transport options, such as public transport and active travel, are maximised through site selection and policy requirements and adequate facilities are installed to encourage a shift to electric vehicles.

Policies which discourage commuting, such as working from home policies, are likely to further reduce air quality impacts upon European sites.

Air quality policy wording which secures air quality assessments for new development should require consideration to be given to adverse air quality impacts upon biodiversity and in particular designated sites.

It is recommended that policy wording reflects NE's guidance on assessing the implications of road traffic on European Sites¹⁵⁹ and includes reference to the Air Quality PPG as appropriate¹⁶⁰.

Water quality and water quantity

4.3.6 The residential, commercial/industrial and mixed-use development proposed under each of the four growth strategy options also has the potential to inflect upon the quality and quantity of water within the Plan area's waterbodies. Development has the potential to reduce the quality of water entering a catchment through processes such as sedimentation, accidental spillage of chemicals and materials, and operational surface water runoff. Water quality may also be reduced through effluent discharges at WWTWs; this can increase nutrient inputs into a catchment which can lead to algal blooms, reduce dissolved oxygen and increase turbidity. The overall condition of the receiving waterbody can be affected, including any hydrologically sensitive and connected European sites and their qualifying features. Development also has the potential to alter the quantity of water reaching European sites, which will impact water levels at these sites. Runoff rates can be affected through urbanisation, which reduces the permeability of surfaces and may involve changes to drains and sewerage systems. Increased water demand associated with new development also has the potential to affect water balances at hydrologically sensitive European sites which are situated within, or hydrologically connected to, the Plan area. As such, development proposed under each of the four site strategy options has the potential to negatively affect the following 15 European sites identified in **Section 3.5** as hydrologically sensitive to changes in water quality and/or quantity as a result of development within the Plan area:

- Fenland SAC;
- Nene Washes SAC;
- Nene Washes SPA;
- Nene Washes Ramsar;

¹⁵⁹ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. Available at: <https://publications.naturalengland.org.uk/file/5431868963160064> [Date accessed: 22/07/25]

¹⁶⁰ MHLG, MHCLG (2018 to 2021) and DLHC. Air quality. Available at: <https://www.gov.uk/guidance/air-quality--3> [Date accessed: 22/07/25]

- Orton Pit SAC;
- Ouse Washes SAC;
- Ouse Washes SPA;
- Ouse Washes Ramsar;
- Portholme SAC;
- The Wash & North Norfolk SAC;
- The Wash SPA;
- The Wash Ramsar;
- Upper Nene Valley Gravel Pits SPA;
- Upper Nene Valley Gravel Pits Ramsar; and,
- Woodwalton Fen Ramsar.

4.3.7 Each of the four growth strategy options prioritise concentrating sites in locations of low flood risk, which generally coincides with the areas of Huntingdonshire that lie further from watercourses and waterbodies. Without considering further site-specific details, none of the four options can be identified as less likely to result in adverse effects upon the quality and quantity of water at the European sites within, and hydrologically linked to, the Plan area.

4.3.8 **Box 4.6** sets out recommendations in terms of water quality and quantity.

Box 4.6: Water quality and quantity recommendations

Water quality and quantity recommendations

It is recommended that strong water policies be included in the Local Plan which protect the quality of waterbodies through the incorporation of measures such as Sustainable Urban Drainage Systems (SuDS) and natural flood management solutions.

The policies should promote high standards of water efficiency in new development.

Larger residential and commercial developments should consider the incorporation of greywater recycling and / or rainwater harvesting into their design to reduce water demand

Recreational pressure

4.3.9 Recreational pressures may be increased as a result of residential and mixed-use development proposed under each of the four site strategy options. Development can result in the emergence of numerous recreational pressures, as outlined in **paragraph 3.6.1**. The impacts of these pressures include:

- Habitat loss;
- Habitat fragmentation;
- Habitat damage through trampling and erosion;
- Disturbance to plants and animals from increased numbers of people undertaking a range of different open air recreational activities;
- Disturbance to plants and animals from dogs; and,

- Pollution and contamination caused by dog fouling (eutrophication).

4.3.10 The scale and magnitude of recreational impacts will depend upon the location and scale of development. Increased recreational pressure can cause the loss of, or damage to, the features for which a European site is designated¹⁶¹. As such, development proposed under each of the four strategy options has the potential to negatively affect the following 11 European sites identified in **Section 3.6** as vulnerable to increased recreational pressure as a result of development within the Plan area:

- Barnack Hills & Holes SAC;
- Eversden & Wimpole Woods SAC;
- Fenland SAC;
- Nene Washes SPA;
- Nene Washes Ramsar;
- Ouse Washes SPA;
- Ouse Washes Ramsar;
- Portholme SAC;
- Upper Nene Valley Gravel Pits SPA;
- Upper Nene Valley Gravel Pits Ramsar; and,
- Woodwalton Fen Ramsar.

4.3.11 Each of the four growth strategy options propose a similar quantum of residential development and, without the consideration of further site-specific details, it is difficult to conclude which of the options are less likely to result in significant effects upon the 12 vulnerable European sites. All growth options propose sites within close proximity to Portholme SAC. Strategies 3 and 4 propose development closest to Fenlands SAC and Woodwalton Fen Ramsar; therefore, these strategies may be the most impactful upon these two European sites. Strategies 2, 3 and 4 all propose development close to the Ouse Washes SPA, SAC, Ramsar. Growth strategy options which avoid development in close proximity to these European sites are likely to limit recreational pressures upon these designations.

4.3.12 **Box 4.7** sets out recommendations in terms of recreational impacts.

Box 4.7: Recreational impact recommendations

Recreational impact recommendations

It is recommended that the Local Plan include policies which protect and promote natural green space across the Plan area for the purposes of recreation, in order to reduce recreational pressure upon European sites.

New development should also seek to incorporate adequate levels of greenspace within their footprint.

The requirements for additional greenspace and mitigation specifically related to recreational impacts from the Local Plan at European sites will be explored further at subsequent stages of the HRA process when details on site selection are better understood.

¹⁶¹ Natural England (2015) Public Access and Disturbance Theme Plan (IPENSTP022). Available at: <https://publications.naturalengland.org.uk/publication/6621454219083776> [Date accessed: 17/07/25]

Urbanisation effects

4.3.13 Urbanisation effects may be increased as a result of the residential, mixed-use and commercial development proposed under each of the four growth strategy options depending on the location and scale of development in relation to European sites. As outlined in **paragraph 3.7.1**, effects associated with urbanisation include noise disturbance, lighting effects, cat predation, fly-tipping, wildfire, littering and vandalism, among other threats. Through increasing the occurrence and extent of these effects, each of the four growth strategy options have the potential to negatively affect the following nine European sites identified in **Section 3.7** as vulnerable to increased urbanisation effects as a result of development within the Plan area:

- Eversden & Wimpole Woods SAC;
- Fenland SAC;
- Orton Pit SAC;
- Ouse Washes SPA;
- Ouse Washes Ramsar;
- Portholme SAC;
- Upper Nene Valley Gravel Pits SPA;
- Upper Nene Valley Gravel Pits Ramsar; and,
- Woodwalton Fen Ramsar.

4.3.14 Concentrating future development in and around existing, built-up settlements within the Plan area will help to reduce the creation of new sources of urbanisation effects. For instance, by concentrating development in and around urban areas that are already sources of noise and light pollution, the creation of new sources of illumination and noise-related disturbance will be avoided. As such, Strategies 1 and 2, which propose the concentration of development around existing settlements, are likely to result in fewer adverse effects upon the seven vulnerable European sites when compared to Strategies 3 and 4.

4.3.15 Only Strategy 2 proposes new development within 400m of a European site (Portholme SAC – site reference Cfs 275). Strategy 4 is the only option which proposes new development within 7km of Eversden and Wimpole Woods SAC, where impacts on bats are possible. Strategies 3 and 4 propose a large commercial development approximately 900m to the north of the Ouse Washes SPA and Ouse Washes Ramsar which, whilst over 400m from the designated sites, may have potential to have noise and visual impacts depending on the source and frequency of disturbance and the nature of development at this site. Strategies 1, 3 and 4 propose development in close proximity to Orton Pit SAC, which is vulnerable to the effects of illegal activities.

4.3.16 **Box 4.8** sets out recommendations in terms of urbanisation impacts.

Box 4.8: Urbanisation impact recommendations

Urbanisation impact recommendations

It is recommended that development be avoided within 400m of any European site.

Urbanisation impact recommendations

Where appropriate, policies should require new development to comply with lighting¹⁶² and noise¹⁶³ standards, quiet construction techniques, and timing work to avoid sensitive seasons.

The requirement for such mitigation will be explored further at subsequent stages of the HRA process when details on site selection and location are better understood.

¹⁶² Guidance Note 08/18 '*Bats and artificial lighting*' by the Bat Conservation Trust and the Institution of Lighting Professionals (2018)

¹⁶³ BS 5228-1:2009+A1:2014: "Code of practice for noise and vibration control on construction and open sites. Noise

5 Next steps

5.1 Conclusions

5.1.1 The purpose of this HRA Scoping Report is to ensure that the HRA forms an integral element of the plan-making process and that best practice is followed throughout.

5.1.2 Scoping has been completed to identify key threats and pressures at European sites due to development coming forward through the Local Plan. The scoping exercise concluded that the following European sites and potential impacts associated with the Local Plan will be scoped into the HRA process:

- **Air quality:** Orton Pit SAC; and Portholme SAC.
- **Water quality and quantity:** Fenland SAC; Nene Washes SAC; Nene Washes SPA; Nene Washes Ramsar; Orton Pit SAC; Ouse Washes SAC; Ouse Washes SPA; Ouse Washes Ramsar; Portholme SAC; The Wash & North Norfolk Coast SAC; The Wash SPA; The Wash Ramsar; Upper Nene Valley Gravel Pits SPA; Upper Nene Valley Gravel Pits Ramsar; and, Woodwalton Fen Ramsar.
- **Recreational pressure:** Barnack Hills & Holes SAC; Eversden & Wimpole Woods SAC; Fenland SAC; Nene Washes SPA; Nene Washes Ramsar; Ouse Washes SPA; Ouse Washes Ramsar; Portholme SAC; Upper Nene Valley Gravel Pits SPA; Upper Nene Valley Gravel Pits Ramsar; and Woodwalton Fen Ramsar.
- **Urbanisation effects:** Eversden & Wimpole Woods SAC; Fenland SAC; Orton Pit SAC; Ouse Washes SPA; Ouse Washes Ramsar; Portholme SAC; Upper Nene Valley Gravel Pits SPA; Upper Nene Valley Gravel Pits Ramsar; and Woodwalton Fen Ramsar.

5.1.3 In addition, an initial, high-level assessment has been undertaken to determine adverse effects of four growth strategy options being considered by the Council. Preliminary recommendations have been made to avoid and minimise adverse effects at European sites. The high-level assessment concluded that, whilst adverse effects upon European sites are anticipated under each of the four strategy options, Strategies 1 and 2 are the least likely to result in adverse effects from impact pathways associated with air quality and urbanisation effects. No best performing option could be identified for impact pathways associated with water quality and quantity, and recreational pressure, at this stage. The outputs and recommendations from this process are intended to help inform the Council's selection of preferred options.

5.2 Next steps

- 5.2.1 The next stage of the HRA process will comprise a formal HRA screening assessment (Stage 1 of the HRA process) of all policies and allocations which will form the Local Plan, to accompany the Preferred Options consultation (at Regulation 18). Screening will take into consideration case law and best practice and outcomes will ensure the HRA influences the plan-making process and site selections in an iterative manner.
- 5.2.2 The outputs of the screening stage will identify LSEs of the Local Plan on European sites which have been scoped into the HRA process in this report and identify whether an AA will be required. If so, it will also detail methods for AA and provide additional recommendations intended to help ensure that the Local Plan does not affect the integrity of any European site.

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Appendix A: In-Combination Assessment

Plans and policies	Plan status	Summary of housing/employment – key elements of the Local Plan that could cause in-combination effects	Summary of HRA findings	Potential in-combination LSE
North Northamptonshire Local Plan ¹	The North Northamptonshire Local Plan (Joint Core Strategy) was adopted in July 2016. Work on a new Local Plan (which will cover the period up to 2045) is currently underway, with plans for the publication of the draft Regulation 18 plan for public consultation in early 2026.	The adopted Local Plan allows for the provision of 1,750 (rounded up to 2,000 when including a buffer as required by national policy) homes per annum from 2011-2031. The adopted Local Plan states that North Northamptonshire has an “ <i>over-supply of committed employment land</i> ”; hence, no further employment land was allocated, but a selection of new strategic sites were identified.	An HRA of the Local Plan was not available at the time of writing.	Yes. This plan will trigger change or development close to the Plan area. There is potential for in-combination air quality, hydrology, recreation and urbanisation LSEs on European sites and areas of functionally linked land (FLL). The HRA will take these in-combination impacts into consideration.
Peterborough Local Plan ²	The Peterborough Local Plan was adopted in July 2019. Work on a new Local Plan (which will cover the period up to 2044) is currently underway, with a Proposed Submission version of the Draft Local Plan intended to be published in autumn 2025 for public consultation.	The adopted Local Plan allows for the provision of 942 homes per annum from 2016 to 2021 (the first five years of the plan period), which then increases to 982 homes per annum from 2021 to 2036 (the remainder of the plan period), in line with the updated Standard Method. The adopted Plan allows for the provision of the 76ha of employment land from April 2015 to March 2036 “ <i>including land already committed with planning permission</i> ”. Further employment land is allocated under this Plan (amounting to	The screening stage of the HRA ⁴ process completed to inform the new, emerging Peterborough Local Plan (for the period up to 2044) concluded that LSEs are possible for Barnack Hills & Holes SAC; Nene Washes SAC, SPA and Ramsar; Orton Pit SAC; and Rutland Water SPA and Ramsar. Hence, an Appropriate Assessment (AA) is recommended.	Yes. This plan will trigger change or development close to the Plan area. There is potential for in-combination air quality, hydrology, recreation and urbanisation LSEs on European sites and areas of FLL. The HRA will take these in-combination impacts into consideration.

¹ North Northamptonshire Council (2016) North Northamptonshire Joint Core Strategy 2011-2031. Available at: <https://www.northnorthants.gov.uk/planning-strategies-and-plans/north-northamptonshire-local-plan> [Date accessed: 03/07/25]

² Peterborough City Council (2019) Peterborough Local Plan 2016 to 2036. Available at: <https://www.peterborough.gov.uk/council/planning-and-development/planning-policies/local-development-plan> [Date accessed: 15/07/25]

⁴ Peterborough City Council (2025) Draft Peterborough Local Plan Habitats Regulations Assessment: Stage 1 Screening, Main Report (March 2025). Available at: <https://cccandpcc.sharepoint.com/sites/PCCPlanningPolicyPublicData/Shared%20Documents/Forms/AllItems.aspx?id=%2Fsites%2FPCCPlanningPolicyPublicData%2FShared%20Documents%2FPlanning%20Policy%2FLocal%20Plan%20Evidence%2FSecondary%20Evidence&p=true&ga=1> [Date accessed: 23/07/25]

Plans and policies	Plan status	Summary of housing/employment – key elements of the Local Plan that could cause in-combination effects	Summary of HRA findings	Potential in-combination LSE
		“around 160ha”) to allow for losses, flexibility and job choice. The draft Local Plan review will allocate approximately 22,130 new dwellings over the plan period and 90ha of employment land³.		
Fenland Local Plan ⁵	The Fenland Local Plan was adopted in May 2014. Work on a new Fenland Local Plan (which will cover the period up to 2040) is currently underway and informal/focused consultations are ongoing from July-September 2025.	The adopted Local Plan allows for the provision of 11,000 new homes over the plan period 2011-2031, at a delivery rate of approximately 550 new homes per annum. The adopted Plan also allows for the provision of 85 ha of employment land (B1/B2/B8 land for employment uses) during 2011 to 2031. The Local Plan review aims to allocate approximately 10,525 new dwellings over the Plan period and 215ha of employment land⁶.	The HRA⁷ completed to inform the new, emerging Fenland Local Plan (for the period up to 2040) concluded no LSEs upon any European sites are anticipated as a result of the new plan.	Yes. This plan will trigger change or development close to the Plan area. There is potential for in-combination air quality, hydrology, recreation and urbanisation LSEs on European sites and areas of FLL. The HRA will take these in-combination impacts into consideration.
East Cambridgeshire District Local Plan 2015 (as amended 2023) ⁸	The East Cambridgeshire Local Plan was adopted in April 2015, with some minor changes then adopted in October 2023.	Over the plan period (2011 to 2031) the Local Plan will allow for the provision of 5,400 new homes and at least 179 ha of employment land for B1/B2/B8 uses. The Local Plan will also allow for the provision of at least an additional	The HRA of the adopted Local Plan set out wording to strengthen policy wording to ensure no adverse impacts on European sites. It reached a	Yes. This plan will trigger change or development close to the Plan area. There is potential for in-combination air quality, hydrology, recreation and

³ Peterborough City Council (2025) Local Plan Review. Available at: <https://www.peterborough.gov.uk/council/planning-and-development/planning-policies/local-plan-review> [Date accessed: 23/07/25]

⁵ Fenland District Council (2014) Fenland Local Plan (Adopted May 2014). Available at: https://www.fenland.gov.uk/media/12064/Fenland-Local-Plan-Adopted-2014/pdf/Fenland_Local_Plan-Adopted_2014.pdf?m=1591111057500 [Date accessed: 01/07/25]

⁶ Fenland District Council (2022) Fenland Local Plan 2021-2040, Draft Local Plan Consultation, August 2022. Available at: https://www.fenland.gov.uk/media/18814/Draft-Local-Plan-August-2022/pdf/Draft_Local_Plan_for_Consultation_Aug_2022.pdf?m=1661177156537 [Date accessed: 23/07/25]

⁷ Fenland District Council (2022) Habitats Regulations Assessment of the Fenland Local Plan Consultation Draft (Regulation 18): Main Report. Available at: https://www.fenland.gov.uk/media/18819/CD07-1-Habitats-Regulation-Assessment-Screening-Main-Report/pdf/CD07-1a_Draft_Local_Plan_HRA_Main_Report_August_2022.pdf?m=1661248724390 [Date accessed: 01/07/25]

⁸ East Cambridgeshire District Council (2023) East Cambridgeshire Local Plan 2015 (as amended 2023). Available at: <https://eastcambs.gov.uk/sites/default/files/2024-10/Local%20Plan%20adopted%2019%20October%202023%20-%20final%20with%20cover.pdf> [Date accessed: 01/07/25]

Plans and policies	Plan status	Summary of housing/employment – key elements of the Local Plan that could cause in-combination effects	Summary of HRA findings	Potential in-combination LSE
	The plan is now referred to as the East Cambridgeshire Local Plan 2015 (as amended 2023). The preparation of the emerging Cambridgeshire Local Plan has been put on hold ⁹ .	3,000m ² (net) of convenience and 10,000m ² (net) of comparison retail floorspace in the district from 2012 to 2031.	conclusion of no adverse impacts on site integrity at any European site ¹⁰ .	urbanisation LSEs on European sites and areas of FLL. The HRA will take these in-combination impacts into consideration.
South Cambridgeshire District Local Plan ¹¹	The South Cambridgeshire Local Plan was adopted in September 2018. Work on the new joint Greater Cambridge Local Plan is currently underway.	Over the plan period (2011 to 2031) the adopted Local Plan will allow for the provision of 19,500 new homes, with an average delivery of 975 homes per annum. The Local Plan will also allow for the provision of at least the 143,000m ² of additional floorspaces or 43 ha of 'B' use employment land required over the plan period. The new joint Greater Cambridge Local Plan proposes approximately 58,500 jobs and 44,400 new homes over the Plan period ¹² .	An HRA ¹³ was completed to inform the adopted Local Plan, which concluded no LSEs upon any European sites alone, or in-combination, as a result of the plan. An HRA ¹⁴ has also been recently completed to inform the emerging new joint Greater Cambridge Local Plan. This HRA also concluded no LSEs	Yes. This plan will trigger change or development close to the Plan area. There is potential for in-combination air quality, hydrology, recreation and urbanisation LSEs on European sites and areas of FLL. The HRA will take these in-combination impacts into consideration.

⁹ East Cambridgeshire District Council (2025) Emerging Local Plan. Available at: <https://eastcambs.gov.uk/planning-and-building-control/planning-policy-and-guidance/emerging-local-plan> [Date accessed: 23/07/25]

¹⁰ East Cambridgeshire District Council (2018) Habitats Regulations Assessment. Available at: <https://eastcambs.gov.uk/sites/default/files/2024-10/HRA%20Appropriate%20Assessment%20Post%20Submission%20Local%20Plan%20-%20published%2015.6.18.pdf> [Date accessed: 28/08/25].

¹¹ South Cambridgeshire District Council (2018) South Cambridgeshire Local Plan (Adopted September 2018). Available at: <https://www.scambs.gov.uk/media/h0vjdqxj/south-cambridgeshire-adopted-local-plan-2018-1.pdf> [Date accessed: 01/07/25]

¹² Greater Cambridge Shared Planning (2021) First Proposals, Greater Cambridge Local Plan, Preferred Options (Regulation 18: Preferred Options 2021). Available at: <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-10/First%20Proposals%20-%20FINAL%20FURTHER%20REVISED%2028.10.21-red.pdf> [Date accessed: 23/07/25]

¹³ ENVIRON (2014) South Cambridgeshire Local Plan Submission Habitats Regulations Assessment: Screening Report. Available at: https://www.scambs.gov.uk/media/214d5ryv/hra-screening_0.pdf [Date accessed: 01/07/25]

¹⁴ Greater Cambridge Shared Planning (2024) Draft Planning Obligations Supplementary Planning Document: Habitats Regulations Assessment Screening Report (November 2024). Available at: https://oc2.greatercambridgeplanning.org/docfiles/1313/Habitats_Regulations_Assessment_Screening_Report_Planning_Obligations_2024.pdf [Date accessed: 02/07/25]

Plans and policies	Plan status	Summary of housing/employment – key elements of the Local Plan that could cause in-combination effects	Summary of HRA findings	Potential in-combination LSE
			upon European sites alone, or in-combination.	
Central Bedfordshire Local Plan ¹⁵	The Central Bedfordshire Local Plan was adopted in July 2021. Work on a new Local Plan (to be adopted by December 2028) is currently underway and publication of a first draft (issues and options) for public consultation is scheduled for early 2026.	Over the plan period (2015 to 2035), the adopted Local Plan will allow for the provision of 44,756, delivered at a varying rate (with most homes expected to be delivered between 2017 and 2029). The Local Plan will also allow for the provision of 118 ha of employment land over the plan period.	An HRA ¹⁶ was completed to inform the adopted Local Plan. This HRA concluded that, due to mitigation provided through the comprehensive policies in the Local Plan, no LSEs were anticipated from the plan alone. Due to neighbouring authorities' mitigative efforts and proposed development locations, in-combination LSEs were also deemed unlikely.	Yes. This plan will trigger change or development close to the Plan area. There is potential for in-combination air quality, hydrology, recreation and urbanisation LSEs on European sites and areas of FLL. The HRA will take these in-combination impacts into consideration.
Bedford Borough Local Plan ¹⁷	The Bedford Local Plan for the period up to 2040 is currently at Examination Stage.	Over the plan period (2020 to 2040) the Local Plan will allow for the provision of 27,100 new homes. The delivery of these homes will be stepped as follows:	An HRA ¹⁸ has been completed to inform the emerging Local Plan. This HRA concluded that the emerging Plan is anticipated to have no LSEs	Yes. This plan will trigger change or development close to the Plan area. There is potential for in-combination air quality, hydrology, recreation and

¹⁵ Central Bedfordshire Council (2021) Central Bedfordshire Local Plan 2015-2035 (July 2021). Available at: <https://centralbedfordshirecouncil.sharepoint.com/sites/Communications/Website%20and%20intranet/Forms/AllItems.aspx?id=%2Fsites%2FCommunications%2FWebsite%20and%20intranet%2FWebsite%20Documents%2FPlanning%2FLocal%20Plan%2FLocal%20Plan%20Documents%2F15%5F%20Adoption%20documents%2F2%5F%20Central%20Bedfordshire%20Local%20Plan%202015%20E2%80%93%202035%2FCentral%20Bedfordshire%20Local%20Plan%202015%20E2%80%93%202035%2Epdf&parent=%2Fsites%2FCommunications%2FWebsite%20and%20intranet%2FWebsite%20Documents%2FPlanning%2FLocal%20Plan%2FLocal%20Plan%20Documents%2F15%5F%20Adoption%20documents%2F2%5F%20Central%20Bedfordshire%20Local%20Plan%202015%20E2%80%93%202035&p=true&q=1> [Date accessed: 02/07/25]

¹⁶ Enfusion (2017) Central Bedfordshire Council Draft Central Bedfordshire Local Plan: Pre-Submission Regulation 19 Consultation, Habitats Regulations Assessment (HRA) Screening Report (December 2017). Available at: <https://centralbedfordshirecouncil.sharepoint.com/sites/Communications/Website%20and%20intranet/Website%20Documents/Planning/Local%20Plan/Local%20Plan%20Web%20update%20180502/Technical%20Reports/C33%20Habitats%20Regulation%20Assessment.pdf?CT=1751450510164&OR=ItemsView> [Date accessed: 02/07/25]

¹⁷ Bedford Borough Council (2022) Local Plan 2040: Plan for Submission (April 2022). Available at: <https://edrms.bedford.gov.uk/OpenDocument.aspx?id=xivh8bP%2bAJZXEaq26SnEFQ%3d%3d&name=PLAN%20FOR%20SUBMISSION.pdf> [Date accessed: 02/07/25]

¹⁸ AECOM (2024) Bedford Borough Local Plan 2040: Habitats Regulations Assessment (April 2022). Available at: <https://edrms.bedford.gov.uk/OpenDocument.aspx?id=No1L4FLZTYpNCVf5ithsPQ%3d%3d&name=Bedford%20Local%20Plan%20HRA%20April%202022.pdf> [Date accessed: 02/07/25]

Plans and policies	Plan status	Summary of housing/employment – key elements of the Local Plan that could cause in-combination effects	Summary of HRA findings	Potential in-combination LSE
		- For the period 2020/21 to 2024/25: 970 homes to be delivered per annum. - For the period 2025/26 to 2029/30: 1,050 homes to be delivered per annum - For the period 2030/31 to 2039/40: 1,700 homes to be delivered per annum. The Local Plan also allows for the provision of between 118 and 142 ha of employment land over the plan period.	upon any European sites, either alone, or in-combination with other plans or projects.	urbanisation LSEs on European sites and areas of FLL. The HRA will take these in-combination impacts into consideration.
Cambridgeshire Local Transport Plan 2011-2031: Policies and Strategy ¹⁹	Published July 2015	Identifies eight key transport-related challenges that the county faces from 2011-2031 and sets out strategies for tackling each of these challenges. This document is complemented by the Long Term Transport Strategy ²⁰ (which outlines the changes required in relation to the county's services and transport infrastructure) and Transport Delivery Plans ²¹ (which outline the transport schemes the county intends to deliver over two-to-three year periods).	The Local Transport Plan was supported by an HRA ²² , which concluded that the Plan was anticipated to have no LSEs on European sites.	No. Policies set out in the Local Transport Plan are likely to encourage a modal shift from the private car and positive impacts upon air quality.
Cambridgeshire and Peterborough Minerals and	Adopted July 2021	Outlines 12 objectives for mineral and waste management in the Cambridgeshire and Peterborough areas, for the period up to 2036. These objectives intend to guide sustainable waste management and the delivery of a	An HRA was not available at the time of writing.	Yes. This plan has the potential to trigger in-combination air, water and urbanisation effects at European sites and upon areas of FLL. The

¹⁹ Cambridgeshire County Council (2015) Third Cambridgeshire Local Transport Plan 2011-2031: Policies and Strategy. Available at: [https://www.cambridgeshire.gov.uk/asset-library/imported-assets/The_Local_Transport_Plan_3%20\(1\).pdf](https://www.cambridgeshire.gov.uk/asset-library/imported-assets/The_Local_Transport_Plan_3%20(1).pdf) [Date accessed: 01/07/25]

²⁰ Cambridgeshire County Council (2015) Third Cambridgeshire Local Transport Plan 2011-2031: Long Term Transport Strategy. Available at: https://www.cambridgeshire.gov.uk/asset-library/imported-assets/R-TP-The_Long_Term_Transport_Strategy.pdf [Date accessed: 01/07/25]

²¹ Cambridgeshire County Council (2015) Transport Delivery Plan. Available at: <https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/transport-delivery-plan> [Date accessed: 01/07/25]

²² Cambridgeshire County Council (2015) HRA Screening: Cambridgeshire LTP2 Refresh (October 2014). Available at: [https://www.cambridgeshire.gov.uk/asset-library/imported-assets/Final_HRA_Report%20\(1\).pdf](https://www.cambridgeshire.gov.uk/asset-library/imported-assets/Final_HRA_Report%20(1).pdf) [Date accessed: 01/07/25]

Plans and policies	Plan status	Summary of housing/employment – key elements of the Local Plan that could cause in-combination effects	Summary of HRA findings	Potential in-combination LSE
Waste Local Plan 2036 ²³		<i>“steady, adequate but sustainable supply of minerals to meet current and projected future need”.</i>		HRA will take these in-combination impacts into consideration.
Anglian River Basin Management Plan (RBMP) ²⁴	The Anglian RBMP was updated in December 2022	The RBMP provides an overview of river basin planning in England for the Anglian River Basin District. It includes an assessment of the status of waterbodies in the River Basin District, objectives for these waterbodies and a summary of the measures necessary to reach these objectives.	The RBMP was supported by an HRA ²⁵ . This concluded that, at the strategic plan level, the RBMP is not likely to have any significant effects on any European sites, alone or in combination with other plans or projects.	The RBMP actions are focused on water bodies and the improvement of European sites that are water dependent. The achievement of these aims will be considered in the HRA process. Whilst development activities arising from Local Plans may inhibit the ability of the RBMP to achieve objectives relating to European sites, the overall effect of the RBMP is to promote management towards Good Ecological Status (GES).
Anglian Water's Water Resource Management Plan (WRMP) 2024 ²⁶	Published August 2023	The WRMP24 sets out how Anglian Water will maintain a sustainable and secure supply of safe drinking water over the plan period.	The WRMP was supported by an HRA ²⁷ . It concluded no adverse impacts on the integrity of any European sites either alone, or in-combination, so long as adjustments are made to the application of	This plan aims to protect the water environment and takes account for future water demand. The achievement of these aims will be considered in the HRA process. It is unlikely that the WRMP will have

²³ Cambridgeshire County Council and Peterborough City Council (2021) Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036. Available at: <https://www.cambridgeshire.gov.uk/business/planning-and-development/planning-policy/adopted-minerals-and-waste-plan> [Date accessed: 24/07/25]

²⁴ Environment Agency (2022) Anglian river basin district river basin management plan: updated 2022. Available at: <https://www.gov.uk/guidance/anglian-river-basin-district-river-basin-management-plan-updated-2022> [Date accessed: 01/07/25]

²⁵ Environment Agency (2022) River basin management plan for the Anglian River Basin District: Habitats Regulations Assessment (September 2022). Available at: https://assets.publishing.service.gov.uk/media/635242f8e90e07768c1a73a0/Anglian_river_basin_management_plan_2022_HRA.pdf [Date accessed: 01/07/25]

²⁶ Anglian Water (2023) Our Water Resources Management Plan 2024. Available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp/revised-draft-wrmp24-main-report-v2.pdf> [Date accessed: 01/07/25]

²⁷ Mott MacDonald (2023) Anglian Water Revised Draft Water Resource Management Plan 2024 Environmental Report Sub-Report A: Habitats Regulations Assessment (HRA). Available at: <https://www.anglianwater.co.uk/SysSiteAssets/household/about-us/wrmp/revised-draft-wrmp24-environmental-report-sub-report-a---hra.pdf> [Date accessed: 17/07/25].

Plans and policies	Plan status	Summary of housing/employment – key elements of the Local Plan that could cause in-combination effects	Summary of HRA findings	Potential in-combination LSE
			measures described in the individual assessments.	alone or in-combination effects on the water environment.
Anglian Water Drought Plan ²⁸	Published April 2022	The Drought Plan outlines the operational steps that will be conducted if a drought occurs in the five-year period from 2022 to 2027. It describes how supplies will be enhanced, demands managed and environmental impacts minimised. It proposes ongoing leakage reduction measures, water efficiency, and monitoring and metering activities.	An HRA ²⁹ was prepared in support of the Drought Plan. It concluded no adverse impacts on the integrity of any European sites, either alone, or in-combination.	This plan aims to protect the water environment in times of drought. The achievement of these aims will be considered in the HRA process. It is unlikely that the Drought Plan will have alone, or in-combination, effects on the water environment.
Affinity Water (AW) Water Resource Management Plan (WRMP) 2024 ³⁰	Published October 2024	Whilst the Plan area is not located within the AW WRMP area, to increase resilience to drought, water trading with AW is discussed within the Anglian WRMP. Within AW's WRMP there is a focus on climate change resilience, the implementation of smart meters and working towards better pipe connections to increase water availability.	An HRA ³¹ was undertaken in support of the WRMP, which set out a series of mitigation measures. The HRA concluded that, provided the mitigation measures are included in the WRMP, it would not result in an adverse effect on any European sites.	This plan aims to protect the water environment and takes account for future water demand. The achievement of these aims will be considered in the HRA process. It is unlikely that the WRMP will have alone or in-combination effects on the water environment.
Cambridge Water's Water Resources	Published March 2025	The WRMP outlines how Cambridge Water will maintain a sustainable and secure supply of safe drinking water over the plan period.	An HRA ³³ was prepared in support of the WRMP. It concluded that the WRMP will,	Yes. The HRA concluded that the plan would have LSEs upon three European sites: Ouse Washes SAC,

²⁸ Anglian Water (2022) Drought Plan 2022 Final Version. Available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/aws-drought-plan-2022.pdf> [Date accessed: 01/07/25]

²⁹ Ricardo (2022) Anglian Water Drought Plan 2022: Habitat Regulations Assessment – Stage 1 Screening and Stage 2 Appropriate Assessment Report. Available at: <https://www.anglianwater.co.uk/SysSiteAssets/household/about-us/aws-drought-plan-2022---hra.pdf> [Date accessed: 01/07/25]

³⁰ Affinity Water (2024) Water Resource Management Plan 2024. Available at: <https://affinitywater.uk/engagement/hq.com/wrmp> [Date accessed: 23/07/25]

³¹ AECOM (2020) Technical Report: 4.12 Habitats Regulations Assessment Revised Draft Water Resources Management Plan 2020-2080. Available at: https://www.affinitywater.co.uk/docs/Water_Resources/Archives/4.12_Habitat_Regulations_Assessment_Final_WRMP19.pdf [Date accessed: 23/07/25]

³³ Ricardo (2023) Habitats Regulations Assessment: Draft Water Resources Management Plan 2024. Available at: <https://www.cambridge-water.co.uk/media/twqh2ovj/cambridge-water-draft-wrmp24-hra-issue-3.pdf> [Date accessed: 01/07/25]

Plans and policies	Plan status	Summary of housing/employment – key elements of the Local Plan that could cause in-combination effects	Summary of HRA findings	Potential in-combination LSE
Management Plan (WRMP) 2024 ³²			alone, have LSEs upon the following three European sites: • Ouse Washes SAC, SPA and Ramsar; • Fenland SAC; and, • Eversden & Wimpole Woods SAC.	SPA and Ramsar; Fenland SAC; and Eversden & Wimpole Woods SAC.
Cambridge Water Drought Plan ³⁴	Published April 2022	The Drought Plan outlines the intended actions of Cambridge Water before, during and after drought events, to ensure water demand needs and the needs of the environment both continue to be met.	An HRA ³⁵ was prepared in support of the Drought Plan. It concluded no adverse impacts on the integrity of any European sites, either alone, or in-combination.	This plan aims to protect the water environment in times of drought. The achievement of these aims will be considered in the HRA process. It is unlikely that the Drought Plan will have alone, or in-combination, effects on the water environment.

³² Cambridge Water (2025) Final Water Resources Management Plan 2024. Available at: <https://www.cambridge-water.co.uk/media/zadnmcfe/cam-water-resources-management-plan-2024-final.pdf> [Date accessed: 01/07/25]

³⁴ Cambridge Water (2022) Cambridge Water drought plan. Available at: <https://www.cambridge-water.co.uk/media/udchgvd1/cambridge-water-final-drought-plan-2022.pdf> [Date accessed: 01/07/25]

³⁵ APEM (2021) Habitats Regulations Assessment Screening Report: Cambridge Water's Draft Drought Plan 2022 (September 2021). Available at: <https://www.cambridge-water.co.uk/media/5yljwncu/appendix-f-habitats-regulation-asessment-screening-report-v1.pdf> [Date accessed: 01/07/25]

Appendix B: European Site Conservation Objectives and Threats and Pressures

Barnack Hills & Holes SAC¹

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats;
- The structure and function (including typical species) of qualifying natural habitats; and,
- The supporting processes on which qualifying natural habitats rely.

Qualifying features:

H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco brometalia*) (important orchid sites); Dry grasslands and scrublands on chalk or limestone (important Orchid sites – priority habitat)

Threats and Pressures at European site which may be affected by the Local Plan^{2,3}:

- Loss of/disconnection from supporting off-site habitat – impact of loss of, or disconnection from, nearby habitats that support or are functionally linked to the site;
- Air pollution – impact of changes to air quality, including atmospheric nitrogen deposition and acidification; and,
- Public access/disturbance.

Eversden & Wimpole Woods SAC⁴

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats;
- The structure and function (including typical species) of qualifying natural habitats;
- The supporting processes on which qualifying natural habitats rely;
- The populations of qualifying species; and,
- The distribution of qualifying species within the site.

Qualifying features:

S1308. *Barbastella barbastellus*; Barbastelle Bat

Threats and Pressures at European site which may be affected by the Local Plan^{5,6}

- Loss of/disconnection from supporting off-site habitat – impact of loss of, or disconnection from, nearby habitats that support or are functionally linked to the site;
- Landscape-altering development – impact of development altering the landscape and causing the loss of/disruption to flight lines to and from the site;

¹ Natural England (2018) European Site Conservation Objectives for Barnack Hills & Holes SAC (UK0030031). Available at: <https://publications.naturalengland.org.uk/publication/5111783597539328> [Date accessed: 02/07/25]

² Natural England (2014) Site Improvement Plan: Barnack Hills & Holes SAC (SIP009). Available at: <https://publications.naturalengland.org.uk/publication/4529218465562624> [Date accessed: 02/07/25]

³ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features, Barnack Hills & Holes Special Area of Conservation (SAC) Site Code: UK0030031. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030031.pdf> [Date accessed: 02/07/25]

⁴ Natural England (2018) European Site Conservation Objectives for Eversden and Wimpole Woods SAC (UK0030331). Available at: <https://publications.naturalengland.org.uk/publication/6736081810620416> [Date accessed: 02/07/25]

⁵ Natural England (2015) Site Improvement Plan: Eversden and Wimpole Woods SAC (SIP078). Available at: <https://publications.naturalengland.org.uk/publication/5757354431741952> [Date accessed: 02/07/25]

⁶ Natural England (2018) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features, Eversden and Wimpole Woods Special Area of Conservation (SAC) Site Code: UK0030331. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030331.pdf> [Date accessed: 02/07/25]

Eversden & Wimpole Woods SAC⁴

- Disturbance from human activity – impact of tree management practices and nighttime light pollution;
- Air pollution – impact of changes to air quality, including atmospheric nitrogen deposition and acidification;
- Water pollution/water quality – impact of pollutants entering supporting water habitats (specifically nearby lakes and ponds); and,
- Hydrology/water quantity – impact of inappropriate water levels of supporting water habitats (specifically nearby lakes and ponds).

Fenland SAC (where it is underpinned by Woodwalton Fen SSSI)⁷

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The population of qualifying species; and,
- The distribution of qualifying species within the site.

Qualifying features:

H6410. *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*); Purple moor-grass meadows

H7210. Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*; Calcium-rich fen dominated by Great Fen-sedge (Saw-sedge) (priority habitat/species)

S1149. *Cobitis taenia*; Spined Loach

S1166. *Triturus cristatus*; Great Crested Newt

Threats and Pressures at European site which may be affected by the Local Plan^{8,9}

- Loss of/disconnection from supporting off-site habitat – impact of loss of, or disconnection from, nearby habitats that support or are functionally linked to the site;
- Air pollution – impact of changes to air quality, including atmospheric nitrogen deposition and acidification;
- Water pollution/water quality – impact of high nutrient levels, changes to water chemistry and other changes to water quality; and,
- Hydrology/water quantity – impact of disturbed water regimes (including the source, depth, duration, frequency, magnitude and timing of water supply), disturbed flooding regimes, changes to water levels, changes to water table height and other hydrological changes.

⁷ Natural England (2018) European Site Conservation Objectives for Fenland SAC (UK0014782). Available at: <https://publications.naturalengland.org.uk/publication/6712672527581184> [Date accessed: 03/07/25]

⁸ Natural England (2014) Site Improvement Plan: Fenland SAC (SIP084). Available at: <https://publications.naturalengland.org.uk/publication/6024783481274368> [Date accessed: 03/07/25]

⁹ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Fenland (SAC) Site Code: UK0014782. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0014782.pdf> [Date accessed: 03/07/25]

Nene Washes SAC¹⁰.

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of the habitats of qualifying species;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which the habitats of qualifying species rely.
- The populations of qualifying species; and,
- The distribution of qualifying species within the site.

Qualifying features:

S1149. *Cobitis taenia*; Spined Loach

Threats and Pressures at the European site which may be affected by the Local Plan^{11,12}.

- Loss of/disconnection from supporting off-site habitat – impact of loss of, or disconnection from, nearby habitats that support or are functionally linked to the site;
- Water pollution/water quality – impacts of high nutrient levels (including high levels of phosphorous) and other changes to water quality; and,
- Hydrology/water quantity – impacts of disturbed flow regimes, changes to water quantity and other hydrological changes.

¹⁰ Natural England (2018) European Site Conservation Objectives for Nene Washes SAC (UK0030222). Available at: <https://publications.naturalengland.org.uk/publication/5559224163631104> [Date accessed: 02/07/25]

¹¹ Natural England (2014) Site Improvement Plan: Nene Washes (SIP146). Available at: <https://publications.naturalengland.org.uk/publication/5376938197647360> [Date accessed: 02/07/25]

¹² Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features, Nene Washes (SAC) Site Code: UK0030222. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030222.pdf> [Date accessed: 02/07/25]

Nene Washes SPA¹³,

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely.
- The populations of each of the qualifying features; and,
- The distribution of the qualifying species within the site.

Qualifying features:

A037. *Cygnus columbianus bewickii*; Bewick's Swan (Non-breeding)

A050. *Anas penelope*; Eurasian Wigeon (Non-breeding)

A051. *Anas strepera*; Gadwall (Breeding)

A051. *Anas strepera*; Gadwall (Non-breeding)

A052. *Anas crecca*; Eurasian Teal (Non-breeding)

A054. *Anas acuta*; Northern Pintail (Non-breeding)

A055. *Anas querquedula*; Garganey (Breeding)

A056. *Anas clypeata*; Northern Shoveler (Non-breeding)

A056. *Anas clypeata*; Northern Shoveler (Breeding)

A156a. *Limosa limosa limosa*; Black-tailed Godwit (Breeding)

Threats and Pressures at the European site which may be affected by the Local Plan^{14, 15}

- Disturbance caused by human activity – disturbance of visitors (including those visiting the site to engage in angling, wildfowling, bird watching and skating);
- Landscape-altering development – impact of development altering the landscape and causing the loss of unobstructed lines of sight within feeding or roosting habitat, which can limit the ability of birds to detect predators;
- Loss of/disconnection from supporting off-site habitat – impact of loss of, or disconnection from, nearby habitats that support or are functionally linked to the site;
- Water pollution/water quality – impacts of high nutrient levels (including high levels of phosphorous) and other changes to water quality; and,
- Hydrology/water quantity – impacts of disturbed flow regimes, changes to water supply, changes to water depth, changes to the area of waterbodies, changes to overall water quantity and other hydrological changes.

¹³ Natural England (2019) European Site Conservation Objectives for Nene Washes SPA (UK9008031). Available at: <https://publications.naturalengland.org.uk/publication/4894064390438912> [Date accessed: 02/07/25]

¹⁴ Natural England (2014) Site Improvement Plan: Nene Washes (SIP146). Available at: <https://publications.naturalengland.org.uk/publication/5376938197647360> [Date accessed: 02/07/25]

¹⁵ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features, Nene Washes (SPA) Site Code: UK9008031. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK9008031.pdf> [Date accessed: 02/07/25]

Nene Washes Ramsar¹⁶

Conservation objectives:

Ramsar sites do not have Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
2	The site supports an important assemblage of nationally rare breeding birds. In addition, a wide range of raptors occur through the year. The site also supports several nationally scarce plants, and two vulnerable and two rare British Red Data Book invertebrate species have been recorded.
6	Qualifying Species/populations (as identified at designation): Species with peak counts in winter: Tundra Swan, <i>Cygnus columbianus bewickii</i>, Northwest Europe 694 individuals, representing an average of 2.3% of the population (five year peak mean 1998/9- 2002/3) Contemporary data and information on waterbird trends at this site and their regional (sub-national) and national contexts can be found in the annual Wetland Bird Survey report.

Threats and Pressures at European site which may be affected by the Local Plan¹⁷:

N/A

Orton Pit SAC¹⁸

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats;
- The structure and function (including typical species) of qualifying natural habitats;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely.
- The populations of qualifying species; and,
- The distribution of qualifying species within the site.

Qualifying features:

H3140. Hard oligo-mesotrophic waters with benthic vegetation of Chara spp.; Calcium-rich nutrient-poor lakes, lochs and pools

S1166. *Triturus cristatus*; Great Crested Newt

¹⁶ JNCC (1993) Information Sheet on Ramsar Wetlands (RIS): Nene Washes. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11046.pdf> [Date accessed: 03/07/25]

¹⁷ Ibid.

¹⁸ Natural England (2018) European Site Conservation Objectives for Orton Pit SAC (UK0030053). Available at: <https://publications.naturalengland.org.uk/publication/5289941760212992> [Date accessed: 02/07/25]

Orton Pit SAC¹⁸

Threats and Pressures at European site which may be affected by the Local Plan^{19,20}

- Loss of/disconnection from supporting off-site habitat – impact of loss of, or disconnection from, nearby habitats that support or are functionally linked to the site;
- Direct impact from third party – impact of illegal activities including off-roading, vandalism, arson and disturbance from dogs jumping into ponds;
- Air pollution – impact of changes to air quality, including atmospheric nitrogen deposition and acidification;
- Water pollution/water quality – impact of acidification; and inappropriate levels of chlorophyll, dissolved oxygen, nitrogen, phosphate and other pollutants; and,
- Hydrology/water quantity – impact of disturbed water regimes, inappropriate water levels, and insufficient water transparency.

Ouse Washes SAC²¹

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of the habitats of qualifying species;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which the habitats of qualifying species rely.
- The populations of qualifying species; and,
- The distribution of qualifying species within the site.

Qualifying features:

S1149. *Cobitis taenia*; Spined Loach

Threats and Pressures at European site which may be affected by the Local Plan^{22,23}

- Loss of/disconnection from supporting off-site habitat – impact of loss of, or disconnection from, nearby habitats that support or are functionally linked to the site;
- Water pollution/water quality – impacts of inappropriate levels of nutrients, organic pollutants and other pollutants (particularly pollution of groundwater); and,
- Hydrology/water quantity – impacts of inappropriate water levels and disturbed flow regimes.

¹⁹ Natural England (2014) Site Improvement Plan: Orton Pit SAC (SIP159). Available at: <https://publications.naturalengland.org.uk/publication/5570370673311744> [Date accessed: 02/07/25]

²⁰ Natural England (2018) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features, Orton Pit Special Area of Conservation (SAC) Site Code: UK0030053. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030053.pdf> [Date accessed: 02/07/25]

²¹ Natural England (2018) European Site Conservation Objectives for Ouse Washes SAC (UK0013011). Available at: <https://publications.naturalengland.org.uk/publication/4894882430713856> [Date accessed: 02/07/25]

²² Natural England (2014) Site Improvement Plan: Ouse Washes (SIP160). Available at: <https://publications.naturalengland.org.uk/publication/5354106084392960> [Date accessed: 02/07/25]

²³ Natural England (2015) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features, Ouse Washes (SAC) Site Code: UK0013011. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0013011.pdf> [Date accessed: 02/07/25]

Ouse Washes SPA²⁴

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely.
- The populations of each of the qualifying features; and,
- The distribution of the qualifying species within the site.

Qualifying features:

A037. *Cygnus columbianus bewickii*; Bewick's Swan (Non-breeding)

A038. *Cygnus cygnus*; Whooper Swan (Non-breeding)

A050. *Anas penelope*; Eurasian Wigeon (Non-breeding)

A051. *Anas strepera*; Gadwall (Breeding)

A052. *Anas crecca*; Eurasian Teal (Non-breeding)

A053. *Anas platyrhynchos*; Mallard (Breeding)

A054. *Anas acuta*; Northern Pintail (Non-breeding)

A055. *Anas querquedula*; Garganey (Breeding)

A056. *Anas clypeata*; Northern Shoveler (Non-breeding)

A056. *Anas clypeata*; Northern Shoveler (Breeding)

A082. *Circus cyaneus*; Hen Harrier (Non-breeding)

A151. *Philomachus pugnax*; Ruff (Breeding)

A156a. *Limosa limosa limosa*; Black-tailed Godwit (Breeding)

Waterbird assemblage

Breeding bird assemblage

Threats and Pressures at European site which may be affected by the Local Plan^{25,26}

- Loss of/disconnection from supporting off-site habitat – impact of loss of, or disconnection from, nearby habitats that support or are functionally linked to the site;
- Disturbance caused by human activity – impact of human activity in and around the site, including angling, wildfowling and walking/dog walking;
- Landscape- and landform-altering development – impact of development altering the landscape/nearby landforms and causing the loss of unobstructed lines of sight within feeding or roosting habitat, which can limit the ability of birds to detect predators;
- Water pollution/water quality – impact of inappropriate levels of nutrients, organic pollutants and other pollutants (particularly pollution of groundwater); and,
- Hydrology/water quantity – impact of disturbed flow regimes, changes to water supply, changes to water area/depth, and other changes to water quantity.

²⁴ Natural England (2019) European Site Conservation Objectives for Ouse Washes SPA (UK9008041). Available at: <https://publications.naturalengland.org.uk/publication/6636062256398336> [Date accessed: 02/07/25]

²⁵ Natural England (2014) Site Improvement Plan: Ouse Washes (SIP160). Available at: <https://publications.naturalengland.org.uk/publication/5354106084392960> [Date accessed: 02/07/25]

²⁶ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features, Ouse Washes (SPA) Site Code: UK9008041. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK9008041.pdf> [Date accessed: 02/07/25]

Ouse Washes Ramsar²⁷

Conservation objectives:

Ramsar sites do not have Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
1	The site is one of the most extensive areas of seasonally-flooding washland of its type in Britain.
2	The site supports several nationally scarce plants, including Small Water Pepper <i>Polygonum minus</i>, Whorled Water-Milfoil <i>Myriophyllum verticillatum</i>, Greater Water Parsnip <i>Sium latifolium</i>, River Waterdropwort <i>Oenanthe fluviatilis</i>, Fringed Water-lily <i>Nymphoides peltata</i>, Long-stalked Pondweed <i>Potamogeton praelongus</i>, Hair-like Pondweed <i>Potamogeton trichoides</i>, Grass-wrack Pondweed <i>Potamogeton compressus</i>, Tasteless Water-pepper <i>Polygonum mite</i> and Marsh Dock <i>Rumex palustris</i>. Invertebrate records indicate that the site holds relict fenland fauna, including the British Red Data Book species Large Darter Dragonfly <i>Libellula fulva</i> and the Rifle Beetle <i>Oulimnius major</i>. The site also supports a diverse assemblage of nationally rare breeding waterfowl associated with seasonally-flooding wet grassland.
5	Assemblages of international importance: Species with peak counts in winter: 59133 Waterfowl (five year peak mean 1998/99-2002/2003)
6	Qualifying Species/populations (as identified at designation): Species with peak counts in winter: - Tundra Swan, <i>Cygnus columbianus bewickii</i>, Northwest Europe 1140 individuals, representing an average of 3.9% of the population (five year peak mean 1998/9- 2002/3) - Whooper Swan, <i>Cygnus cygnus</i>, Iceland/UK/Ireland 653 individuals, representing an average of 3.1% of the population (five year peak mean 1998/9- 2002/3) - Eurasian Wigeon, <i>Anas penelope</i>, Northwest Europe 22630 individuals, representing an average of 1.5% of the population (five year peak mean 1998/9-2002/3) - Gadwall, <i>Anas strepera strepera</i>, Northwest Europe 438 individuals, representing an average of 2.5% of the GB population (five year peak mean 1998/9- 2002/3) - Eurasian Teal, <i>Anas crecca</i>, Northwest Europe 3384 individuals, representing an average of 1.7% of the GB population (five year peak mean 1998/9-2002/3) - Northern Pintail, <i>Anas acuta</i>, Northwest Europe 2108 individuals, representing an average of 3.5% of the population (five year peak mean 1998/9-2002/3) - Northern Shoveler, <i>Anas clypeata</i>, Northwest and central & Europe 627 individuals, representing an average of 1.5% of the population (five year peak mean 1998/9- 2002/3) Contemporary data and information on waterbird trends at this site and their regional (sub-national) and national contexts can be found in the annual Wetland Bird Survey report.

²⁷ JNCC (1976) Information Sheet on Ramsar Wetlands (RIS): Ouse Washes. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11051.pdf> [Date accessed: 03/07/25]

Threats and Pressures at European site which may be affected by the Local Plan²⁸:

- Eutrophication – impact of high nutrient levels caused by sewage treatment works and agricultural runoff; and,
- Reservoir/barrage/dam impact: flooding – recent decades have seen an increase in occurrence of spring flooding and winter flood depths. These two factors have had an adverse impact on vegetation and bird features of the site.

Portholme SAC²⁹

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats;
- The structure and function (including typical species) of qualifying natural habitats; and,
- The supporting processes on which qualifying natural habitats rely.

Qualifying features:

H6510. Lowland hay meadows (*Alopecurus pratensis*, *Sanguisorba officinalis*)

Threats and Pressures at European site which may be affected by the Local Plan^{30,31}

- Disturbance caused by recreation/visitors to the site – impact of unmanaged levels of site visitation and use of the site for recreation;
- Loss of/disconnection from supporting off-site habitat – impact of loss of, or disconnection from, nearby habitats that support or are functionally linked to the site;
- Air pollution – impact of changes to air quality, including atmospheric nitrogen deposition and acidification;
- Water pollution/water quality – impact of high nutrient levels arising from floodwaters from the River Ouse; and,
- Hydrology/water quantity – impact of disturbed water regimes, disturbed flooding regimes, and inappropriate water table levels.

²⁸ Ibid.

²⁹ Natural England (2018) European Site Conservation Objectives for Portholme SAC (UK0030054). Available at: <https://publications.naturalengland.org.uk/publication/4802651548024832> [Date accessed: 02/07/25]

³⁰ Natural England (2014) Site Improvement Plan: Portholme SAC (SIP177). Available at: <https://publications.naturalengland.org.uk/publication/6533964571344896> [Date accessed: 02/07/25]

³¹ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Portholme Special Area of Conservation (SAC) Site Code: UK0030054. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030054.pdf> [Date accessed: 02/07/25]

Rutland Water SPA³²

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and,
- The distribution of the qualifying features within the site.

Qualifying features:

A005. *Podiceps cristatus*; Great Crested Grebe (Non-breeding)

A036. *Cygnus olor*; Mute Swan (Non-breeding)

A050. *Anas penelope*; Eurasian Wigeon (Non-breeding)

A051. *Anas strepera*; Gadwall (Non-breeding)

A052. *Anas crecca*; Eurasian Teal (Non-breeding)

A056. *Anas clypeata*; Northern Shoveler (Non-breeding)

A061. *Aythya fuligula*; Tufted Duck (Non-breeding)

A067. *Bucephala clangula*; Common Goldeneye (Non-breeding)

A070. *Mergus merganser*; Goosander (Non-breeding)

A125. *Fulica atra*; Common Coot (Non-breeding)

Waterbird assemblage

Threats and Pressures at European site which may be affected by the Local Plan³³

- Public access/disturbance – impacts of recreational activities in and around the SPA, including regular activities such as water sports, fishing, cycling, birdwatching and walking, and infrequent large events held on the banks of the reservoir annually;
- Direct impact from third party – impact of activities such as private firework displays in adjacent properties, hot air balloon flights and private aircraft flights;
- Planning permission – impacts of increasing development around the SPA (including development of windfarms), directly harming waterfowl species as well as resulting in habitat loss and fragmentation;
- Water pollution/water quality – impact of inappropriate nutrient levels (from diffuse sources, such as agriculture, and point sources, such as regulated treated and unregulated untreated sewage discharge into the SPA) and other pollutants; and,
- Hydrology/water quantity – impacts of inappropriate water levels, through human-induced changes to hydraulic conditions, including deliberate water abstraction practices.

Rutland Water Ramsar³⁴

Conservation objectives:

Ramsar sites do not have Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

³² Natural England (2023) European Site Conservation Objectives for Rutland Water SPA (UK9008051). Available at: <https://publications.naturalengland.org.uk/publication/4978639963684864> [Date accessed: 02/07/25]

³³ Natural England (2014) Site Improvement Plan: Rutland Water SPA (SIP208). Available at: <https://publications.naturalengland.org.uk/publication/5985520903520256> [Date accessed: 02/07/25]

³⁴ JNCC (1991) Information Sheet on Ramsar Wetlands (RIS): Rutland Water. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11062.pdf> [Date accessed: 03/07/25]

Ramsar Criterion	Justification for the application of each criterion
5	Assemblages of international importance: Species with peak counts in winter: 19274 Waterfowl (five year peak mean 1998/99-2002/2003)
6	Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn: - Gadwall, <i>Anas strepera strepera</i>, Northwest Europe 1014 individuals, representing an average of 1.6% of the population (five year peak mean 1998/9- 2002/3) - Northern Shoveler, <i>Anas clypeata</i>, Northwest and central & Europe 619 individuals, representing an average of 1.5% of the population (five year peak mean 1998/9- 2002/3) Contemporary data and information on waterbird trends at this site and their regional (sub-national) and national contexts can be found in the annual Wetland Bird Survey report.

Threats and Pressures at European site which may be affected by the Local Plan³⁵:

N/A

The Wash & Norfolk Coast SAC³⁶

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of the habitats of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats;
- The structure and function of the habitats of qualifying species;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The populations of qualifying species; and,
- The distribution of qualifying species within the site.

Qualifying features:

H1110. Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks

H1140. Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats

H1150. Coastal lagoons (priority habitat)

H1160. Large shallow inlets and bays

H1170. Reefs

H1310. *Salicornia* and other annuals colonising mud and sand; Glasswort and other annuals colonising mud and sand

H1330. Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)

H1420. Mediterranean and thermo-Atlantic halophilous scrubs (*Sarcocornetea fruticosi*); Mediterranean

³⁵ Ibid.

³⁶ Natural England (2018) European Site Conservation Objectives for The Wash & North Norfolk Coast SAC (UK0017075). Available at: <https://publications.naturalengland.org.uk/publication/5950176598425600> [Date accessed: 03/07/25]

The Wash & Norfolk Coast SAC³⁶

saltmarsh scrub

S1355. *Lutra lutra*; Otter

S1365. *Phoca vitulina*; Common Seal

Threats and Pressures at European site which may be affected by the Local Plan^{37,38}

- Public access/disturbance – impact of disturbance by visitors and recreational activity (including, but not limited to, boating, low altitude aircraft use, wildlife tours/watching, kiting, motorised vehicle use, biking, walking/dog walking, littering and barbecuing on the beach);
- Coastal squeeze – impact of sea level rise and coastal development (including erection and maintenance of coastal defences), which result in the loss of intertidal and coastal habitats;
- Loss of/disconnection from supporting off-site habitat – impact of loss of, or disconnection from, nearby habitats that support or are functionally linked to the site;
- Air pollution – impact of changes to air quality, including atmospheric nitrogen deposition and acidification;
- Water pollution/water quality – impacts (including increased turbidity) of inappropriate levels of nutrients, dissolved oxygen, toxic chemicals, and other pollutants and contaminants; and,
- Hydrology/water quantity – impacts of inappropriate water levels/depth, changes to water area, changes to water density, and changes to the source, depth, duration, frequency, magnitude and timing of water supply or flow, through human-induced changes to hydraulic conditions.

The Wash SPA³⁹

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely.
- The populations of each of the qualifying features; and,
- The distribution of the qualifying species within the site.

Qualifying features:

A037. *Cygnus columbianus bewickii*; Bewick's Swan (Non-breeding)

A040. *Anser brachyrhynchus*; Pink-footed Goose (Non-breeding)

A046a. *Branta bernicla bernicla*; Dark-bellied Brent Goose (Non-breeding)

A048. *Tadorna tadorna*; Common Shelduck (Non-breeding)

A050. *Anas penelope*; Eurasian Wigeon (Non-breeding)

A051. *Anas strepera*; Gadwall (Non-breeding)

A054. *Anas acuta*; Northern Pintail (Non-breeding)

A065. *Melanitta nigra*; Black (Common) Scoter (Non-breeding)

A067. *Bucephala clangula*; Common Goldeneye (Non-breeding)

A130. *Haematopus ostralegus*; Eurasian Oystercatcher (Non-breeding)

³⁷ Natural England (2014) Site Improvement Plan: The Wash and North Norfolk Coast (SIP245). Available at: <https://publications.naturalengland.org.uk/publication/5327498292232192> [Date accessed: 03/07/25]

³⁸ Natural England (2024) The Wash & North Norfolk Coast SAC, Supplementary Advice. Available at: <https://designatedsites.naturalengland.org.uk/ConservationAdvice/SupplementaryAdvice.aspx?SiteCode=UK0017075&SiteName=the+wash+&SiteNameDisplay=The+Wash+and+North+Norfolk+Coast+SAC&countyCode=29&responsiblePerson=&SeaArea=&IFCAArea=&NumMarineSeasonality=2> [Date accessed: 03/07/25]

³⁹ Natural England (2019) European Site Conservation Objectives for The Wash SPA (UK9008021). Available at: <https://publications.naturalengland.org.uk/publication/5747661105790976> [Date accessed: 03/07/25]

The Wash SPA³⁹

- A141. *Pluvialis squatarola*; Grey Plover (Non-breeding)
A143. *Calidris canutus*; Red Knot (Non-breeding)
A144. *Calidris alba*; Sanderling (Non-breeding)
A149. *Calidris alpina alpina*; Dunlin (Non-breeding)
A156. *Limosa limosa islandica*; Black-tailed Godwit (Non-breeding)
A157. *Limosa lapponica*; Bar-tailed Godwit (Non-breeding)
A160. *Numenius arquata*; Eurasian Curlew (Non-breeding)
A162. *Tringa totanus*; Common Redshank (Non-breeding)
A169. *Arenaria interpres*; Ruddy Turnstone (Non-breeding)
A193. *Sterna hirundo*; Common Tern (Breeding)
A195. *Sterna albifrons*; Little Tern (Breeding)

Waterbird assemblage

Breeding bird assemblage

Threats and Pressures at European site which may be affected by the Local Plan^{40,41}

- Public access/disturbance – impact of disturbance by visitors and recreational activity (including, but not limited to, boating, low altitude aircraft use, wildlife tours/watching, kiting, motorised vehicle use, biking, walking/dog walking, littering and barbecuing on the beach);
- Coastal squeeze – impact of sea level rise and coastal development (including erection and maintenance of coastal defences), which result in the loss of intertidal and coastal habitats;
- Landscape-altering development – impact of development altering the landscape and causing the loss of unobstructed lines of sight within feeding or roosting habitat, which can reduce predation detection by birds and fragment habitats;
- Loss of/disconnection from supporting off-site habitat – impact of loss of, or disconnection from, nearby habitats that support or are functionally linked to the site;
- Air pollution – impact of changes to air quality, including atmospheric nitrogen deposition and acidification;
- Water pollution/water quality – impacts (including increased turbidity) of inappropriate levels of nutrients, dissolved oxygen, toxic chemicals, and other pollutants and contaminants; and,
- Hydrology/water quantity – impacts of inappropriate water levels/depth, changes to water area, changes to water density, and changes to the source, depth, duration, frequency, magnitude and timing of water supply or flow, through human-induced changes to hydraulic conditions.

The Wash Ramsar⁴²

Conservation objectives:

Ramsar sites do not have Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

⁴⁰ Natural England (2014) Site Improvement Plan: The Wash and North Norfolk Coast (SIP245). Available at: <https://publications.naturalengland.org.uk/publication/5327498292232192> [Date accessed: 03/07/25]

⁴¹ Natural England (2024) The Wash SPA, Supplementary Advice. Available at: <https://designatedsites.naturalengland.org.uk/ConservationAdvice/SupplementaryAdvice.aspx?SiteCode=UK9008021&SiteName=the%20wash%20&SiteNameDisplay=The+Wash+SPA&countyCode=29&responsiblePerson=&SeaArea=&IFCAArea=&NumMarineSeasonality=21> [Date accessed: 03/07/25]

⁴² JNCC (1988) Information Sheet on Ramsar Wetlands (RIS): The Wash. Available at: <https://jncc.gov.uk/jncc-assets/RIS/uk11072.pdf> [Date accessed: 03/07/25]

Ramsar Criterion	Justification for the application of each criterion
1	The Wash is a large shallow bay comprising very extensive saltmarshes, major intertidal banks of sand and mud, shallow water and deep channels.
3	Qualifies because of the inter-relationship between its various components including saltmarshes, intertidal sand and mud flats and the estuarine waters. The saltmarshes and the plankton in the estuarine water provide a primary source of organic material which, together with other organic matter, forms the basis for the high productivity of the estuary.
5	Assemblages of international importance: Species with peak counts in winter: 292541 Waterfowl (five year peak mean 1998/99-2002/2003)
6	Qualifying Species/populations (as identified at designation): Species with peak counts in spring/autumn: - Eurasian Oystercatcher, <i>Haematopus ostralegus ostralegus</i>, Europe and northwest Africa (wintering) 15616 individuals, representing an average of 1.5% of the population (five year peak mean 1998/9-2002/3) - Grey Plover, <i>Pluvialis squatarola</i>, Eastern Atlantic/western Africa (wintering) 13129 individuals, representing an average of 5.3% of the population (five year peak mean 1998/9-2002/3 - spring peak) - Red Knot, <i>Calidris canutus islandica</i>, Western and southern Africa (wintering) 68987 individuals, representing an average of 15.3% of the population (five year peak mean 1998/9-2002/3) - Sanderling, <i>Calidris alba</i>, Eastern Atlantic 3505 individuals, representing an average of 2.8% of the population (five year peak mean 1998/9-2002/3) - Eurasian Curlew, <i>Numenius arquata arquata</i>, N. a. <i>arquata</i> Europe (breeding) 9438 individuals, representing an average of 2.2% of the population (five year peak mean 1998/9-2002/3) - Common Redshank, <i>Tringa totanus totanus</i>, 6373 individuals, representing an average of 2.5% of the population (five year peak mean 1998/9-2002/3) - Ruddy Turnstone, <i>Arenaria interpres interpres</i>, Northeastern Canada, Greenland/western Europe and northwest Africa 888 individuals, representing an average of 1.7% of the GB population (five year peak mean 1998/9- 2002/3) Species with peak counts in winter: - Pink-footed Goose, <i>Anser brachyrhynchus</i>, Greenland, Iceland/UK 29099 individuals, representing an average of 12.1% of the population (five year peak mean 1998/9-2002/3) - Dark-bellied Brent Goose, <i>Branta bernicla bernicla</i>, 20861 individuals, representing an average of 9.7% of the population (five year peak mean 1998/9-2002/3) - Common Shelduck, <i>Tadorna tadorna</i>, Northwest Europe 9746 individuals, representing an average of 3.2% of the population (five year peak mean 1998/9-2002/3) - Northern Pintail, <i>Anas acuta</i>, Northwest Europe 2108 individuals, representing an average of 3.5% of the population (five year peak mean 1998/9-2002/3) - Dunlin, <i>Calidris alpina alpina</i>, Western Siberia/western Europe 36600 individuals, representing an average of 2.7% of the population (five year peak mean 1998/9-2002/3) - Bar-tailed Godwit, <i>Limosa lapponica lapponica</i>, Western Palearctic 16546 individuals, representing an average of 13.7% of the population (five year peak mean 1998/9-2002/3) Contemporary data and information on waterbird trends at this site and their regional (sub-national) and national contexts can be found in the annual Wetland Bird Survey report.

Threats and Pressures at European site which may be affected by the Local Plan⁴³:

N/A

Upper Nene Valley Gravel Pits SPA⁴⁴

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features;
- The structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and,
- The distribution of the qualifying features within the site.

Qualifying features:

A021. *Botaurus stellaris*; Great Bittern (Non-breeding)

A051. *Anas strepera*; Gadwall (Non-breeding)

A140. *Pluvialis apricaria*; European Golden Plover (Non-breeding)

Waterbird assemblage

Threats and Pressures at European site which may be affected by the Local Plan^{45,46}

- Public access/disturbance – disturbance from recreation (particularly walkers and dog owners) and outdoor sports and leisure activities;
- Planning permission – impact of increasing built and recreational development within and around the SPA, resulting in habitat loss and fragmentation, and increased disturbance;
- Loss of/disconnection from supporting off-site habitat – impact of loss of, or disconnection from, nearby habitats that support or are functionally linked to the site;
- Landscape-altering development – impact of development altering the landscape and causing the loss of unobstructed lines of sight within feeding or roosting habitat, which can reduce predation detection by birds and fragment habitats;
- Water pollution/water quality – impacts of changes to water quality; and,
- Hydrology/water quantity – impacts of inappropriate water levels/depth, changes to water area, and other changes to water quantity.

Upper Nene Valley Gravel Pits Ramsar⁴⁷

Conservation objectives:

Ramsar sites do not have Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

⁴³ Ibid.

⁴⁴ Natural England (2019) European Site Conservation Objectives for Upper Nene Valley Gravel Pits SPA (UK9020296). Available at: <https://publications.naturalengland.org.uk/publication/5495529882517504> [Date accessed: 02/07/25]

⁴⁵ Natural England (2014) Site Improvement Plan: Upper Nene Valley Gravel Pits SPA (SIP254). Available at: <https://publications.naturalengland.org.uk/publication/6732225261338624> [Date accessed: 02/07/25]

⁴⁶ Natural England (2017) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Upper Nene Valley Gravel Pits Special Protection Area (SPA) Site Code: UK9020296 Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK9020296.pdf> [Date accessed: 04/07/25]

⁴⁷ JNCC (2011) Information Sheet on Ramsar Wetlands (RIS): Upper Nene Valley Gravel Pits. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11083.pdf> [Date accessed: 03/07/25]

Ramsar Criterion	Justification for the application of each criterion
5	The site regularly supports 20,000 or more waterbirds: In the non-breeding season, the site regularly supports 23,821 individual waterbirds (5 year peak mean 1999/2000 – 2003/04).
6	Qualifying Species/populations (as identified at designation): Species with peak counts in winter: • Mute Swan, <i>Cygnus olor</i>, 629 individuals, representing an average of 1.7% GB population (five year peak mean 1999/2000- 2003/4) • Gadwall, <i>Anas strepera strepera</i>, Northwest Europe 773 individuals, representing an average of 2.0% of the population (five year peak mean 1999/2000- 2003/4) Contemporary data and information on waterbird trends at this site and their regional (sub-national) and national contexts can be found in the annual Wetland Bird Survey report.

Threats and Pressures at European site which may be affected by the Local Plan⁴⁸:

- Unspecified development: urban use – activities connected with ongoing urban development can cause significant disturbance to wintering birds if unmanaged; and,
- Recreation/tourism disturbance – access by people and dogs both on and off of public rights of way is a significant cause of disturbance in some areas. The site is also subject to a variety of recreational activities including fishing and water sports. Demand for access and formal/informal recreational activities within the Nene Valley are increasing; development of facilities/opportunities is often in an uncoordinated manner.

⁴⁸ Ibid.

Woodwalton Fen Ramsar⁴⁹

Conservation objectives:

Ramsar sites do not have Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

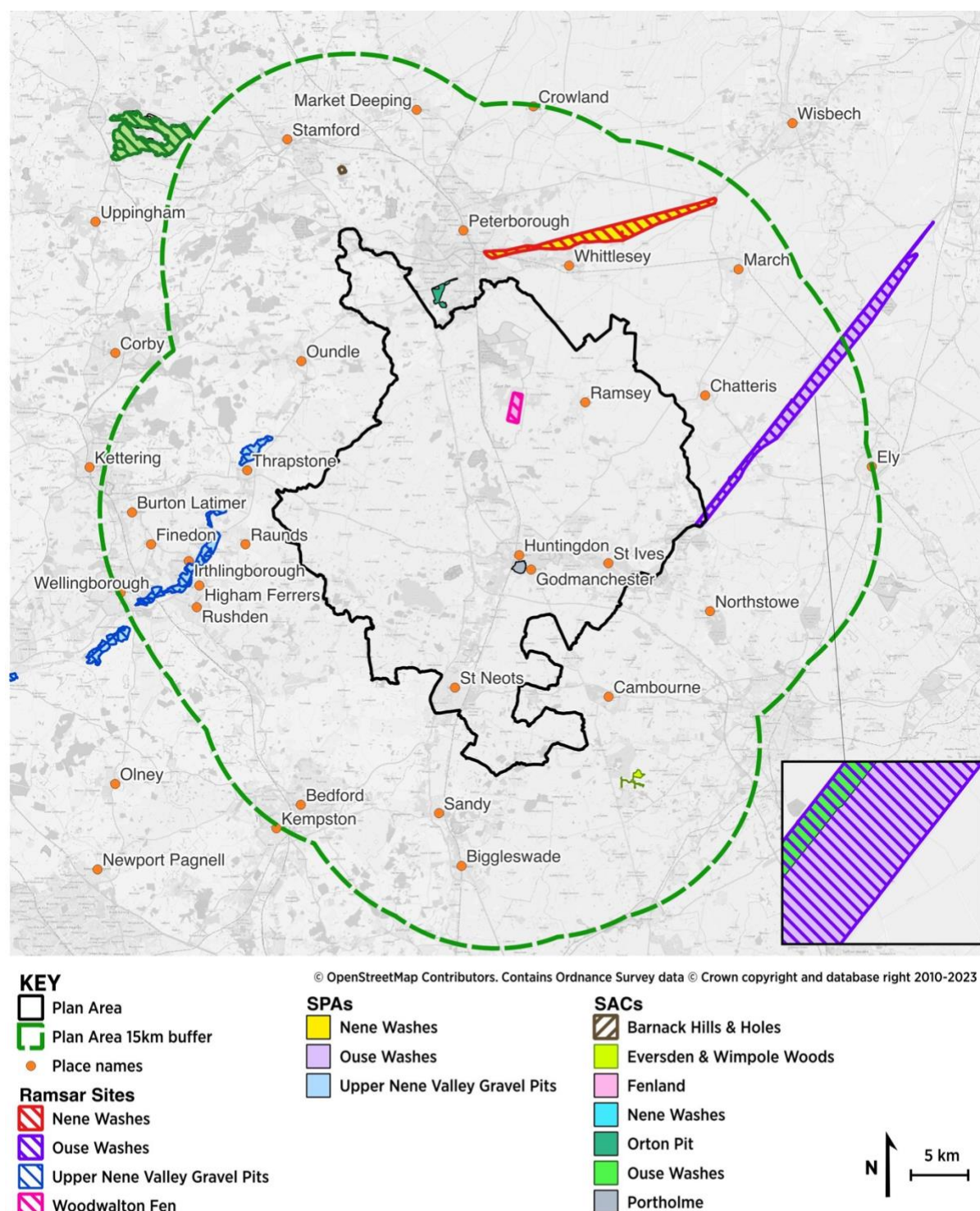
Ramsar Criterion	Justification for the application of each criterion
1	The site is within an area that is one of the remaining parts of East Anglia which has not been drained. The fen is near natural and has developed where peat-digging took place in the 19th century. The site has several types of open fen and swamp communities.
2	The site supports two species of British Red Data Book plants, Fen Violet (<i>Viola persicifolia</i>) and Fen Wood-rush (<i>Luzula pallidula</i>). Woodwalton also supports a large number of wetland invertebrates including 20 British Red Data Book species. Aquatic beetles, flies and moths are particularly well represented.

Threats and Pressures at European site which may be affected by the Local Plan⁵⁰:

- Eutrophication; and,
- Drainage/land-claim for agriculture.

⁴⁹ JNCC (1995) Information Sheet on Ramsar Wetlands (RIS): Woodwalton Fen. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11078.pdf> [Date accessed: 03/07/25]

⁵⁰ Ibid.

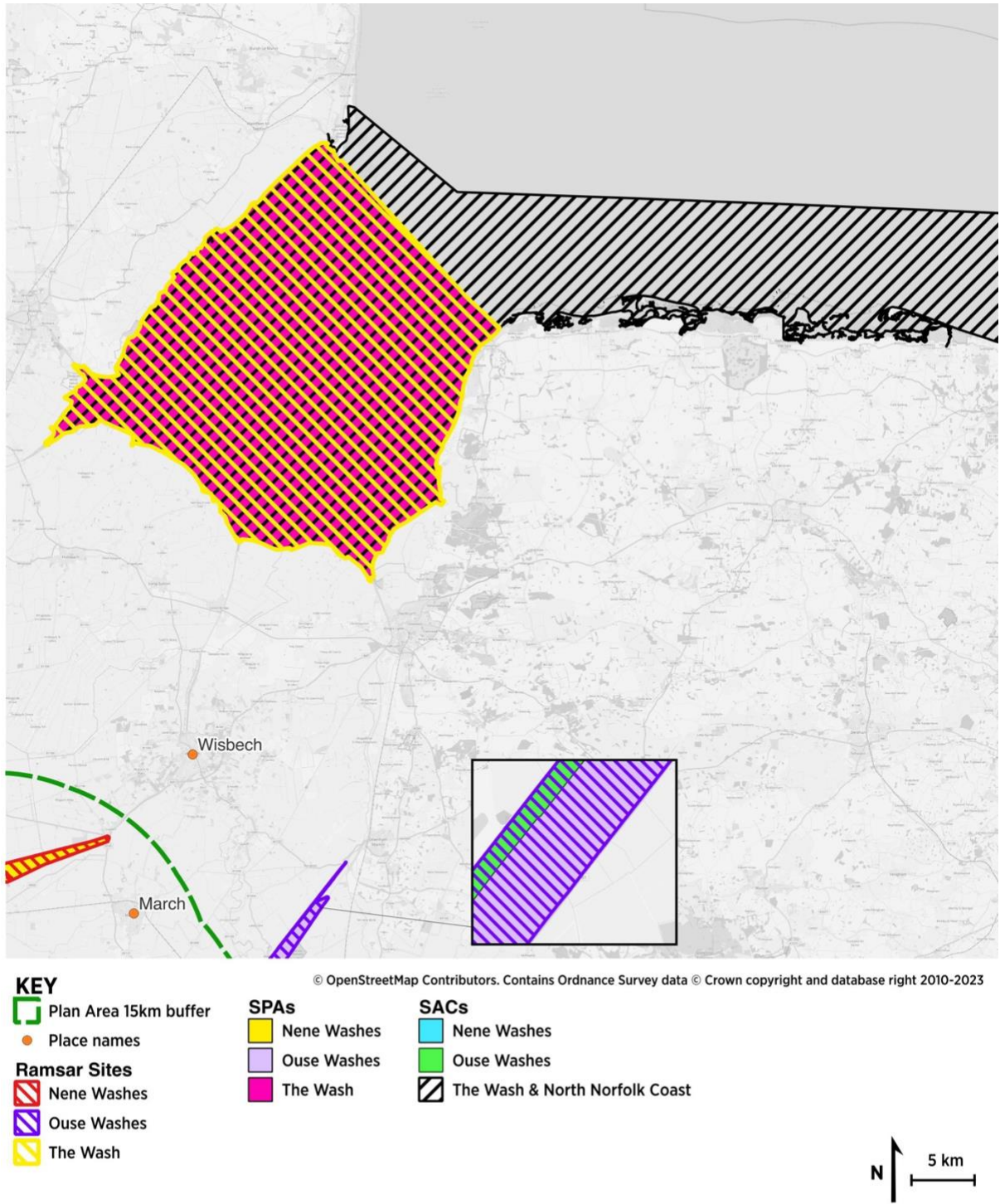


PROJECT	Huntingdonshire Local Plan, HRA	DRAWN	FA
CLIENT	Huntingdonshire District Council	CHECKED	SC
TITLE	European sites	SCALE@A4	1:664800
VERSION	LC-1376_Huntingdonshire_HRA_Biodiversity_1of2_3	DATE	25/07/2025

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Figure B.1: European sites scoped into the HRA process (1)



PROJECT	Huntingdonshire Local Plan, HRA	DRAWN	FA	 LEPUS CONSULTING LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY Lepus Consulting, Eagle Tower Montpellier Drive, Cheltenham, GL50 1TA T: +44 (0)1242 525222 E: enquiries@lepusconsulting.com www.lepusconsulting.com
CLIENT	Huntingdonshire District Council	CHECKED	SC	
TITLE	European sites	SCALE@A4	1:617100	
VERSION	LC-1376_Huntingdonshire_HRA_Biodiversity_2of2_2	DATE	25/07/2025	

Figure B.2: European sites scoped into the HRA process (2) to illustrate the location of The Wash SPA, The Wash Ramsar and The Wash & North Norfolk Coast SAC.

Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys

Biodiversity Net Gain



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