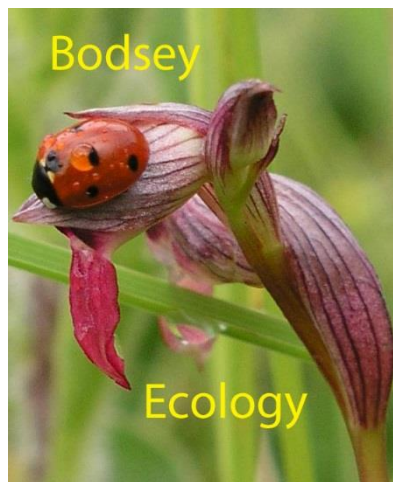


# Huntingdonshire's Local Plan to 2036 - Habitats Regulations Assessment 2017

**Bodsey Ecology Limited**

**Addendum to Final Report  
16<sup>th</sup> November 2017**

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## Disclaimer

Huntingdonshire 's Local Plan to 2036 – Habitats Regulations Assessment 2017

Addendum to Final Report

Prepared by: Pete Carey

Date: 16<sup>th</sup> November 2017

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A handwritten signature in black ink, appearing to read 'Pete Carey', consisting of several fluid, overlapping strokes.

Director: Bodsey Ecology Limited

## Executive Summary

1. Bodsey Ecology Limited was appointed by Huntingdonshire District Council in November 2016 to undertake an Appropriate Assessment (AA) of “Huntingdonshire’s Local Plan to 2036: towards submission (HLP2036)”.
2. Appropriate Assessment (AA) is required under the EU Habitats Directive (92/43/EEC), as transposed into the Habitats Regulations 2010, for any proposed plan or project which may have a significant effect on one or more European sites and which is not necessary for the management of those sites. Within the UK the process is typically known as HRA. The purpose of HRA is to determine whether or not significant effects are likely and to suggest ways in which they could be avoided.
3. Following the addition of an extra 962 dwellings in 13 allocations to the HLP2036 in late 2017 this addendum to the HRA was required. The purpose of the document is to revisit the conclusions from the HRA, following the addition of the new allocations to the analysis undertaken for the HRA.
4. The extra dwellings from the new allocations represent an increase of 4.7% on the number evaluated in the original HRA.
5. There are two new allocations where further investigation will be required if they are to proceed. The proximity of one of the new allocations in Bluntisham to the Ouse Washes SAC/SPA/Ramsar will require further investigation, as it could account for 33% of the extra visitors to the site arising from HLP2036. The new allocation at Little Paxton is adjacent to typical foraging habitat of the Barbastelle Bats at Eversden and Wimpole Woods SAC and a survey should be carried out to confirm that the bats do not use this site.
6. This Addendum concludes that the increase in the number of dwellings does not affect the conclusions of the HRA (May 2017).

## 1 Introduction

### 1.1 Background

- 1.1.1 Bodsey Ecology Limited was appointed by Huntingdonshire District Council in November 2016 to undertake an Appropriate Assessment (AA) of “Huntingdonshire’s Local Plan 2036: towards submission” document issued on 21<sup>st</sup> November 2016.
- 1.1.2 ‘Appropriate Assessment (AA)’ is required under the EU Habitats Directive (92/43/EEC) for any proposed plan or project which is not for the management of European sites and which may have a significant effect upon them. Within the UK the process is usually known as HRA. The purpose of AA is to determine whether or not adverse effects on site integrity will occur and to propose ways in which they could be avoided.
- 1.1.3 The AA (Bodsey Ecology, 2017a) followed the need for Habitats Regulations Assessment (HRA) identified by a Screening Report of earlier drafts of the Huntingdonshire Local Plan (The Landscape Partnership, 2013) and a review of that Screening Report (Bodsey Ecology Limited, 2017b).
- 1.1.4 In late 2017 the number of dwellings included in the HLP2036 was increased with the addition of 13 new allocations that potentially add 962 dwellings to the number assessed in the HRA (Bodsey Ecology, 2017a) representing an increase of 4.7%. Both the impacts of the increase in the number of dwellings and their location required further assessment. That assessment is made in this addendum to the original AA.

### 1.2 This Report

- 1.2.1 This report does not repeat in detail the Habitat Regulations Assessment process or its legislative context both of which can be found in the Final Report (Bodsey Ecology, 2017a). The production of this addendum did however involve repeating the AA analyses presented in the HRA, but with the inclusion of the new allocations. The results of the new analyses are presented as tables in a series of appendices which can be used in conjunction with those in the HRA Final Report.
- 1.2.2 This report assesses how the new allocations for development could affect the overall conclusions presented in the HRA Final Report and whether any of the new allocations require particular attention before development takes place over and above the recommendations made therein.

## 2 Screening of the policies for HLP2036

### 2.1 Changes to HLP2036

- 2.1.1 Since the production of the HRA Final Report (Bodsey Ecology, 2017a) the HLP2036 has been altered to include, amongst other things, comments and recommendations on the version used for the HRA (21<sup>st</sup> November 2016). The policies within the latest version of the HLP2036 (2<sup>nd</sup> November 2017) are numbered differently, some have been added and some removed. To avoid possible misinterpretation of the conclusions of the previous reports (Bodsey Ecology, 2017a,b and The Landscape Partnership, 2013) and this Addendum, a cross-tabulation of the policy numbers is given as Appendix 1.

### 2.2 Screening the policies to include the new allocations

- 2.2.1 The AA identified eight policies that had negative likely significant effects (Appendix 2, Bodsey Ecology, 2017a). The new versions of these policies were screened including the 4.7% increase in

the number of dwellings. The order of the policies in the following section follows the order from the HRA Final Report (Bodsey Ecology, 2017a) but the numbering follows the HLP2036 (2<sup>nd</sup> November 2017 version). This makes cross-referencing simpler but does mean the numbering in this Addendum does not follow a numerical progression. The outcome of the screening is as follows:

#### LP1 Amount of Development and LP2 Strategy for Development

- 2.2.2 LP1 is a new policy that was previously included within LP2 (HLP 2036, 21<sup>st</sup> November 2016). The scale of the development of Huntingdonshire was previously identified as a likely significant effect in the AA and this remains true. The 4.7% increase in the number of dwellings will exacerbate this.

#### LP6 Spatial Planning Areas

- 2.2.3 This policy is still identifiable as having a likely significant effect but the increase in the number of dwellings from the allocations added in the 2<sup>nd</sup> November 2017 version of HLP2036 has no impact, as the policy refers to development that is within existing settlements and not the new allocations.

#### LP3 Green Infrastructure

- 2.2.4 There is an inherent risk to biodiversity and the condition status of vegetation from an increase in the use of sites by the public. There is therefore a conflict between the goals of the Green infrastructure policy (and the plans it refers to) and biodiversity goals. This is unavoidable in the current policy environment. The increase of visitors to the European sites from the allocations added to the HLP2036 between November 2016 and November 2017 will not increase the likely significant effect on them. The exception could be a new site in Bluntisham (see Section 2.32 below) that is close to the Ouse Washes.

#### LP16 Surface Water

- 2.2.5 This policy in the latest version of the HLP2036 (2<sup>nd</sup> November 2017) addresses the potential impact of surface water on the European sites identified in the AA (Bodsey Ecology, 2017a). The new version of the policy removes the likely significant effect on the assumption that the policy is followed. The additional dwellings in the new allocations will not, therefore, have a likely significant effect on the European sites.
- 2.2.6 Since the AA (Bodsey Ecology, 2017a) the authors of that report have been made aware that floodwater on Portholme SAC rarely originates from the River Great Ouse or the Alconbury Brook but from the surrounding land as groundwater (Pat Doody pers comm.). This lowers the threat from development upstream of Portholme (e.g. Bedfordshire, St Neots or Alconbury).

#### LP5 Waste Water Management

- 2.2.7 This policy in the latest version of the HLP2036 (2<sup>nd</sup> November 2017) addresses the potential impact of waste water management on the European sites identified in the AA (Bodsey Ecology, 2017a) and the likely significant effect has been removed if the policy is followed. The additional dwellings in the new allocations will not, therefore, have a likely significant effect on the European sites.

#### LP18 Parking Provision

- 2.2.8 This policy in the latest version of the HLP2036 (2<sup>nd</sup> November 2017) addresses the potential impact of surface water run-off from parking areas on the European sites identified in the AA (Bodsey Ecology, 2017a) and the likely significant effect has been removed if the policy is followed. The additional dwellings in the new allocations will not, therefore, have a likely significant effect on the European sites.

#### LP19 Established Employment Areas

- 2.2.9 This policy in the latest version of the HLP2036 (2<sup>nd</sup> November 2017) addresses the potential impact of development in established employment areas on the European sites identified in the AA (Bodsey Ecology, 2017a) and the likely significant effect has been removed if the policy is followed. The additional dwellings in the new allocations will not, therefore, have a likely significant effect on the European sites.

### LP37 Renewable and Low Carbon Energy

2.2.10 This policy in the latest version of the HLP2036 (2<sup>nd</sup> November 2017) addresses the potential impact of renewable and low carbon energy projects on the European sites identified in the HRA (Bodsey Ecology, 2017a) and the likely significant effect has been removed if the policy is followed. The additional dwellings in the new allocations will not, therefore, have a likely significant effect on the European sites.

### 2.3 Screening of the new allocations for development of HLP2036

- 2.3.1 The 13 new allocations for development (Figure 1) were added to those screened in the HLP2036 (21<sup>st</sup> November 2016 version). These were screened against the 7 policies identified in Section 2 above and were split into the same two groups for analysis used in the AA (Bodsey Ecology, 2017a). The first group concerned recreation and the second concerned human induced changes to hydraulic conditions, groundwater pollution and reduction in water quality. The results of screening for the impacts of recreation on the European sites are given in Appendix 2 and for water related impacts in Appendix 3. Analyses followed the same methodology used for the AA (Bodsey Ecology, 2017a).
- 2.3.2 The number of additional visitors to the European sites will not have a likely significant effect over and above those identified in the AA (Bodsey Ecology, 2017a). This is because the number of extra visitors will be very small. The one exception is a site for up to 150 dwellings in Bluntisham (157 - west of Longacres) that potentially increases the number of visitors to the Ouse Washes caused by HLP2036 by 33% on its own. However, the impacts of these visitors on the qualifying features of this European Site are likely to be minimal. This is because the wintering and breeding birds tend to congregate further north in the washes than the parking area in Earith where visitors would begin their walks. Any extra birdwatchers are likely to visit sites managed by RSPB or the WWT and will therefore be encouraged not to have an impact. The second smaller site for 29 dwellings in Bluntisham will also have an impact on visitor numbers but its small size makes the effects negligible.
- 2.3.3 The new allocations in the HLP2036 (2<sup>nd</sup> November 2017 version) will not have any additional likely significant effects on the European sites (Appendices 4-10) because of the additions to the policies within the document that have been added since November 2016. The 4.7% (maximum) value of the increase in the number of dwellings increases the likely significant effects of the whole of HLP2036 by a similar amount ie 4.7%.
- 2.3.4 The lack of headroom at Oldhurst, Ramsey and Somersham Wastewater Treatment Works (WwTW) will constrain any development of the allocations that would feed into these WwTW. A side-effect of this will be to protect the Ouse Washes SAC/SPA/Ramsar and, in the case of Ramsey, Woodwalton Fen SAC. Once the headroom of the WwTW is increased the likely significant effects that could be attributed to pollution from an increase in the number of dwellings will be mitigated against.
- 2.3.5 The impacts on the qualifying features of European Sites resulting from the likely significant effects from HLP2036 including the new allocations in combination with the likely significant effects from all other local area plans were assessed following the same methodology as the AA (Bodsey Ecology, 2017a). In the tables in Appendices 4-9 the column headings have changed from the binary “y/n” used in the HRA Final Report (Bodsey Ecology, 2017a) to “y/n/no extra” so that the lack of effect and impact from the new allocations can be seen easily. It was not necessary to include a category of “extra” in any of the tables as there were no additional effects or impacts.
- 2.3.6 The extra dwellings from the new allocations will have no extra impacts on qualifying features of European Sites resulting from: recreational use (Appendix 4); human induced changes in hydraulic conditions (drought) (Appendix 5); human induced changes in hydraulic conditions (flooding) (Appendix 6); invasive non-native species (Appendix 7); pollution to groundwater (Appendix 8) and reduction in water quality (Appendix 9).

- 2.3.7 The distance of the new allocations to the Eversden and Wimpole Woods SAC was calculated to assess the possible impacts on the qualifying feature, the Barbastelle Bat (Appendix 10). Any site within 20km of the SAC could potentially be used by the bats although a previous study (South Cambridgeshire District Council 2009) produced a map that shows the area of interest where the distance from the SAC is considerably less than 20km. We assume the 2009 study takes precedence. Nevertheless, analysis was carried out for two of the sites, Godmanchester (19km) and Little Paxton (17km) that are within the 20km radius. They are very small and the chances of the bats visiting is considered negligible especially when the published map is taken into consideration. However, the site at Little Paxton has a long woodland edge and is close to freshwater which is the foraging habitat of this species of bat. It would be prudent for a bat survey to be undertaken before this allocation progresses further.

### 3 Conclusion

- 3.1.1 The new allocations added to HLP 2036 between November 2016 and November 2017 do not affect the conclusions of the HRA Final Report (Bodsey Ecology 2017a).



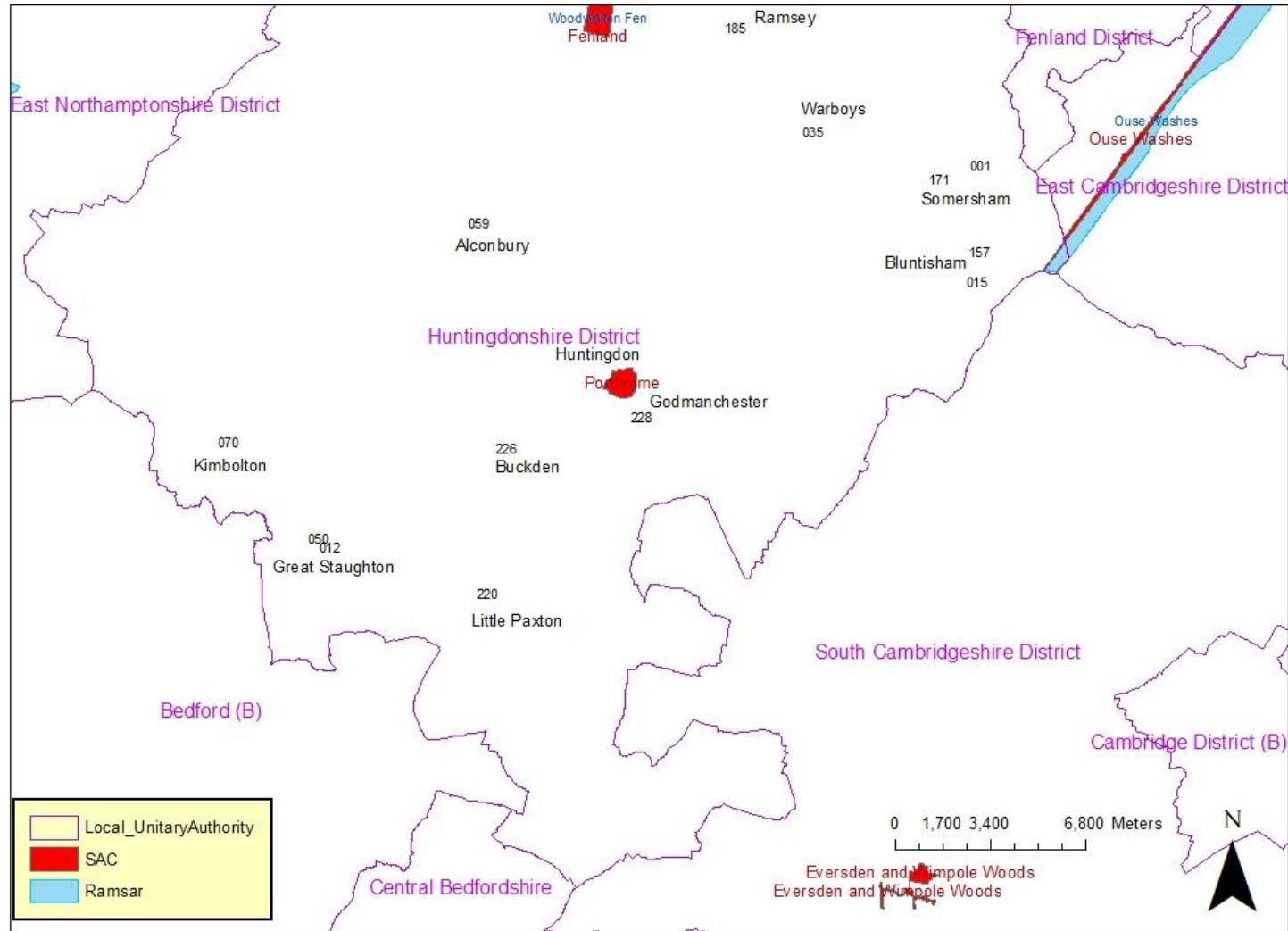


Figure 1. Allocations added to HLP2036 in November 2017

## Glossary

<b>Appropriate Assessment (AA)</b>	An assessment of the effect of a plan or project on the Natura 2000 network. The network comprises Special Protection Areas under the Birds Directive and Special Areas of Conservation under the Habitats Directive (collectively referred to as European sites).
<b>Avoidance</b>	Prevents impacts on European sites from happening in the first place.
<b>Catchment Flood Management Plan</b>	Catchment flood management plans (CFMPs) consider all types of inland flooding, from rivers, groundwater, surface water and tidal flooding. Shoreline management plans consider flooding from the sea. CFMPs also include: the likely impacts of climate change; the effects of how we use and manage the land; and how areas could be developed to meet our present day needs without compromising the ability of future generations to meet their own needs.
<b>Compensation</b>	Off-site offsetting put in place where a significant impact will occur, where there is no alternative, and where the plan is deemed necessary.
<b>Competent authority</b>	The plan-making/decision making authority.
<b>Conservation objectives</b>	A statement of the nature conservation aspirations for a site, expressed in terms of the favourable condition required for the habitats and/or species for which the site was selected.
<b>Environment Agency</b>	An executive non-departmental body sponsored by Defra. It has responsibilities in England for: regulating industry and major waste; treatment of contaminated land; water quality and resources; fisheries; inland river estuary and harbour navigations; conservation and ecology; and managing the risk of flooding from main rivers and estuaries.
<b>European sites</b>	Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). Includes Ramsar sites in this report.
<b>Favourable condition</b>	Designated land is adequately conserved and is meeting its 'conservation objectives', however, there is scope for enhancement.
<b>Habitats Directive</b>	Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna.
<b>Habitats Regulations</b>	Formally known as the Conservation of Habitats and Species Regulations 2010 (Statutory Instrument 2010 No 490). These transpose the requirements of the Habitats Directive into domestic legislation.
<b>Imperative reasons of overriding public interest (IROPI)</b>	The Habitats Regulations require competent authorities to establish that there are no alternative solutions before a plan or project can be considered for imperative reasons of overriding public interest. Judgements involve an assessment of the importance of the proposal and whether it is sufficient to override the nature conservation importance of the site.
<b>In-combination</b>	The cumulative effects caused by the project or plan that is currently under consideration, together with the effects of any existing or proposed projects or plans.
<b>Integrity</b>	The integrity of a site is the coherence of its ecological structure and function, across its whole area that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified.
<b>JNCC</b>	Is the advisor to UK government on conservation
<b>Member State</b>	Nation state member of the EU
<b>Middle Level</b>	The Middle Level of the Fens is, as its name suggests, the middle division of the Bedford Level, which occupies the southern half of the great Fenland, and which includes the Isle of Ely and portions of Cambridgeshire, Northamptonshire, Norfolk, and Lincolnshire, as well as several thousand acres in the north-east of Huntingdonshire.

<b>Middle Level Commissioners</b>	The Middle Level Commissioners are a statutory corporation created under the Middle Level Acts 1810-74 and operating also under the Land Drainage Act 1991, the Flood and Water Management Act 2010 and the Nene Navigation Act 1753. The Commissioners' primary functions comprise the provision of flood defence and water level management to the Middle Level area, and as navigation authority for the navigable waters of the Middle Level system. The Commissioners have also certain conservation duties to fulfil when undertaking their functions.
<b>Mitigation</b>	Reduces the impact of the site integrity to the point where it no longer has adverse effects.
<b>Natura 2000</b>	A Europe-wide network of sites of international importance for nature conservation established under the European Community Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC; 'Habitats Directive').
<b>Natural England (NE)</b>	Natural England works for people, places and nature, to enhance biodiversity, landscape and wildlife in rural, urban, coastal and marine areas; promote access, recreation and public well-being. Natural England was formed by bringing together English Nature, the landscape, access and recreation elements of the Countryside Agency and the environmental land management functions of the Rural Development Service.
<b>Precautionary Principle</b>	Prudent action which avoids the possibility of irreversible environmental damage in situations where the scientific evidence is inconclusive but the potential damage could be significant.
<b>Qualifying (Interest) Feature</b>	The reasons why the European site has been recommended for designation (e.g. the endangered species that occupy a SAC; the rare habitats that occur there; or threatened birds that breed or over-winter in an SPA).
<b>Ramsar sites</b>	Sites designated as internationally important wetland habitats under the International Convention on Wetlands of International Importance (1976) (Ramsar Commission).
<b>River Basin Management Plan</b>	The WFD calls for a management plan to be developed for each river basin district. In England the Environment Agency is the competent authority for the WFD and it published the first river basin management plans in December 2009. Updates were produced in 2015.
<b>Screening</b>	The process of deciding whether or not a plan or project requires an Appropriate Assessment.
<b>Special Area of Conservation (SAC)</b>	Site of European Importance for nature conservation designated under the Conservation of Natural Habitats and Wild Flora and Fauna Directive (92/43/EEC)
<b>Special Protection Area (SPA)</b>	Site of European importance for nature conservation designated under the Conservation of Wild Birds Directive (70/409/EEC)
<b>Water Cycle Study</b>	A voluntary study that helps organisations work together to plan for sustainable growth. It uses water and planning evidence and the expertise of partners to understand environmental and infrastructure capacity. The study provides evidence for Local Plans and sustainability appraisals.

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## HRAs and HRA screening

Appendix C: Habitats Regulations Assessment Screening Report for the Draft Cambridge Local Plan 2014 (May 2013).

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## Appendix 1 – Cross tabulation between policies of HLP2036 versions 2017, 2016 and 2013

2017 Code	2017 Name	2016 code	2013 code
LP1	Amount of Development	in LP1	in LP1
LP2	Strategy for Development	LP1	LP1
LP3	Green infrastructure	LP7	LP7
LP4	Contributing to infrastructure delivery	LP16	LP2
LP5	Waste Water Management	LP19	LP6
LP6	Spatial Planning Areas	LP3	LP8
LP7	Key Service Centres	LP4	LP9
LP8	Local Service Centres	LP4	LP9
LP9	Small Settlements	LP5	LP10
LP10	The Countryside	LP6	LP11
LP11	Flood Risk	LP17	LP6
LP12	Design Context	LP9	
LP13	Design Implementation	LP9	
LP14	Placemaking		
LP15	Amenity	LP22	LP15
LP16	Surface Water	LP18	LP6
LP17	Sustainable Travel	LP25	LP17
LP18	Parking Provision	LP26	LP18
LP19	Established employment areas	LP27	LP19
LP20	Rural economy	LP28	LP21
LP21	Homes for rural workers	LP29	LP26?
LP22	Town centre vitality and viability	LP30	LP20
LP23	Local services and facilities	LP31	LP23
LP24	Tourism and recreation	LP32	LP22
LP25	Affordable housing provision	LP12	LP25
LP26	Housing mix	LP23	LP24
LP27	Specialist housing	LP24	
LP28	Gypsies, travellers and travelling showpeople	LP14	
LP29	Community Planning Proposals	LP10	
LP30	Rural Exceptions Housing	LP13	LP4
LP31	Health Impact Assessment	LP11	
LP32	Biodiversity and geodiversity	LP33	LP28
LP33	Trees, woodland, hedges and hedgerows	LP34	LP29
LP34	Protection of open spaces	LP35	LP30
LP35	Rural buildings	LP36	LP26?
LP36	Heritage assets and their settings	LP37	LP31
LP37	Renewable and low carbon energy	LP38	LP5,LP14
LP38	Air Quality		
LP39	Ground contamination and groundwater pollution	LP39	LP6
LP40	Water related development	LP40	LP6

## Appendix 2 – Screening Allocations for Recreational Threats

For this screening it was possible to use the ORVAL visitor estimates to gauge the size of the issue facing some of the European Sites, although some are not included in ORVAL. At the beginning of the entries for each European Site in the tables below the figures obtained from ORVAL are given (shaded grey).

Orton Pits has almost no access as the public are excluded. Woodwalton Fen is not easily accessible and tends to be visited only by naturalists with their families (sometimes). The Ouse washes have visitor centres but most of the area is fairly inaccessible and the same is true of the Nene Washes. Paths along the banks of both sites do exist. Rutland Water has a large tourist economy and the number of extra visitors from Huntingdonshire will not be a high percentage of the total. Although there may be more visitors to the Eversden and Wimpole Woods they will not affect the Qualifying Feature. Barnack Hills and Holes is too far away from any allocations for regular visits, there are likely to be a small number of new visits from naturalists but these will not have a significant impact.

A very simplistic metric was developed by Bodsey Ecology in the absence of visitor surveys from other sources. The metric divides the number of dwellings by the square of the distance from the nearest edge of the European site to the nearest edge of the development. Hence very close, large sites will have a large effect and very small distant sites will have almost no effect. This metric emphasises distance (possibly over emphasises it) as it is known that most visitors will not travel long distances for casual recreational activity such as walking the dog. As dogs cause more disturbance to animals than non-motorised humans this is particularly pertinent. The metric was applied to Portholme SAC, Ouse Washes SAC/SPA/Ramsar, and Woodwalton Fen SAC as these are the three sites within Huntingdonshire. The “% visitor metric” (Column 6) for Portholme, Woodwalton Fen and Ouse Washes tables was calculated by dividing the metric for an allocation by the sum of the metric for all allocations and multiplying by 100. In Column 7 of the table for Portholme SAC the impact on the site is given in terms of the % of visits from the allocation. An allocation providing less than 1% of visits will have no measurable impact, an allocation providing between 1 and 10% of the visitors was deemed to have minimal impact. Allocations providing higher percentages of the visitors are highlighted.

### Reference

<http://leep.exeter.ac.uk/orval/>

Allocation code	Allocation Name	Number of dwellings	Proportion of dwellings	Distance to Portholme (km)	% visitor metric	Impact on Portholme (SAC)
<b>ORVAL annual visitor estimate</b>					<b>not available</b>	
228	Godmanchester North of Clyde Farm	39	0.00	0.87	0.14	<1% of visitors: no impact
185	Bury, East of Valiant Square	88	0.00	12.5	0.00	<1% of visitors: no impact
220	Little Paxton, north of St James Road to north of High Street	34	0.00	8.5	0.00	<1% of visitors: no impact
226	Buckden, East of Silver Street	247	0.01	3.8	0.05	<1% of visitors: no impact
70	Kimbolton, north of Station Road/ Stowe Road	66	0.00	13.5	0.00	<1% of visitors: no impact
1	Somersham, east of Robert Avenue	74	0.00	14.4	0.00	<1% of visitors: no impact
171	Somersham, College Farm, west of Newlands Industrial Estate	57	0.00	12.9	0.00	<1% of visitors: no impact
35	Warboys, South of Stirling Close	49	0.00	10.6	0.00	<1% of visitors: no impact
59	Alconbury, north of School Lane	95	0.00	7	0.01	<1% of visitors: no impact
15	Bluntisham, north of 10 Station Road	29	0.00	12.7	0.00	<1% of visitors: no impact
157	Bluntisham, west of Longacres	150	0.01	12.9	0.00	<1% of visitors: no impact
12	Great Staughton, between 20 Cage Hill and Averyhill	14	0.00	11.3	0.00	<1% of visitors: no impact
50	Great Staughton, south of 29 Perry Road	20	0.00	11.5	0.00	<1% of visitors: no impact



Allocation code	Allocation Name	Number of dwellings	Proportion of dwellings	Distance to Ouse Washes	% visitor metric	Impact on Ouse Washes (SPA, Ramsar)
<b>ORVAL annual visitor estimate</b>					not available	
228	Godmanchester North of Clyde Farm	39	0.00	15.5	0.11	<1% of visitors: no impact
185	Bury, East of Valiant Square	88	0.00	13.8	0.31	<1% of visitors: no impact
220	Little Paxton, north of St James Road to north of High Street	34	0.00	23	0.04	<1% of visitors: no impact
226	Buckden, East of Silver Street	247	0.01	20.2	0.41	<1% of visitors: no impact
70	Kimbolton, north of Station Road/ Stowe Road	66	0.00	30	0.05	<1% of visitors: no impact
1	Somersham, east of Robert Avenue	74	0.00	3.8	3.46	Some impact possible but distance to area used by qualifying features is large so minimal
171	Somersham, College Farm, west of Newlands Industrial Estate	57	0.00	4.7	1.74	<1% of visitors: no impact
35	Warboys, South of Stirling Close	49	0.00	9.6	0.36	<1% of visitors: no impact
59	Alconbury, north of School Lane	95	0.00	20	0.16	<1% of visitors: no impact
15	Bluntisham, north of 10 Station Road	29	0.00	2.3	3.70	Some impact possible but distance from access point to area used by qualifying features is large so minimal
157	Bluntisham, west of Longacres	150	0.01	2	25.32	Impact on qualifying features (birds) is possible if banks of Ouse washes used for walking. Access point is a long distance from main areas used by qualifying features (birds)
12	Great Staughton, between 20 Cage Hill and Averyhill	14	0.00	27.5	0.01	<1% of visitors: no impact
50	Great Staughton, south of 29 Perry Road	20	0.00	28	0.02	<1% of visitors: no impact

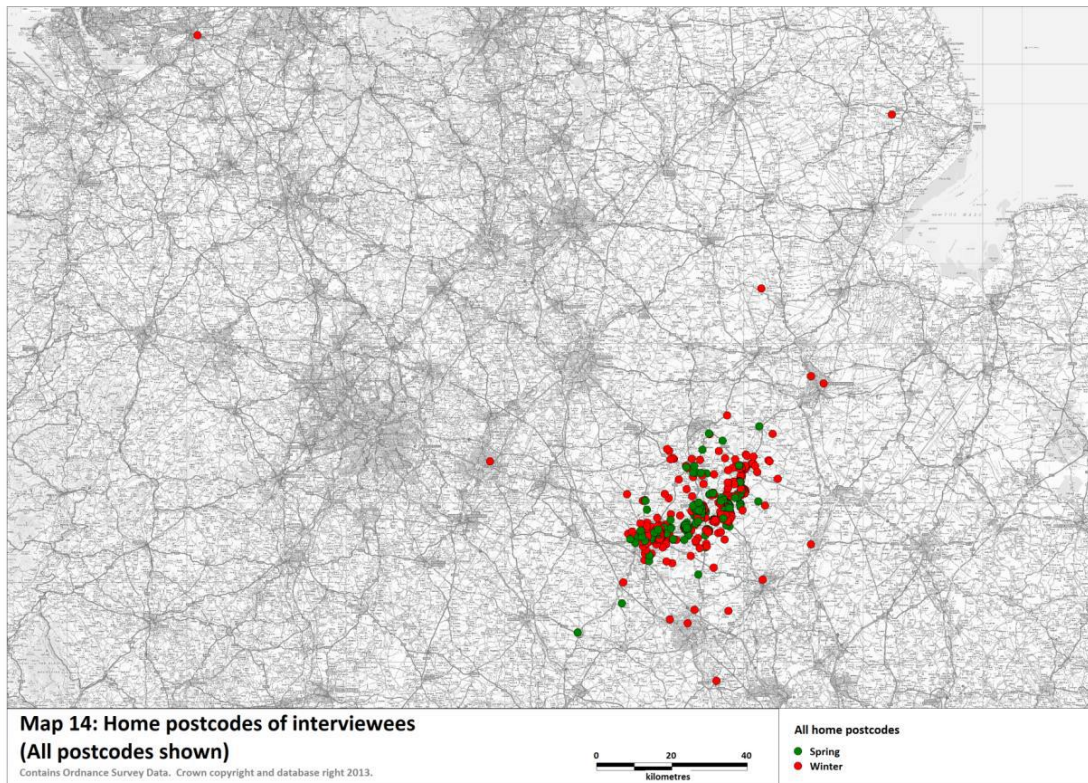
Allocation code	Allocation Name	Number of dwellings	Proportion of dwellings	Distance to Woodwalton Fen	% visitor metric	Impact on Woodwalton Fen (Ramsar, SAC (part))
<b>ORVAL annual visitor estimate</b>					56238 visitors per year	
228	Godmanchester North of Clyde Farm	39	228	13.8	0.06	
185	Bury, East of Valiant Square	88	185	4.4	1.24	
220	Little Paxton, north of St James Road to north of High Street	34	220	20	0.02	
226	Buckden, East of Silver Street	247	226	15.3	0.29	
70	Kimbolton, north of Station Road/ Stowe Road	66	70	20	0.04	no dog walking rule will make number of extra visitors small
1	Somersham, east of Robert Avenue	74	1	14.1	0.10	
171	Somersham, College Farm, west of Newlands Industrial Estate	57	171	12.9	0.09	
35	Warboys, South of Stirling Close	49	35	8.1	0.20	
59	Alconbury, north of School Lane	95	59	7.7	0.44	
15	Bluntisham, north of 10 Station Road	29	15	15.8	0.03	
157	Bluntisham, west of Longacres	150	157	15.4	0.17	
12	Great Staughton, between 20 Cage Hill and Averyhill	14	12	21	0.01	
50	Great Staughton, south of 29 Perry Road	20	50	20.6	0.01	

Allocation code	Allocation Name	Number of dwellings	Distance to Barnack	Barnack Hills and Holes (SAC)	Orton Pits (SAC)	Nene Washes (SAC,SPA, Ramsar)	Rutland Water (SPA, Ramsar)	Eversden and Wimpole Woods (SAC)	The Wash (SPA, Ramsar)
<b>ORVAL annual visitor estimate</b>				21176 = low number of visitors per year	not relevant	not available	196291 = minimum number as from only one part of tourist centre	not relevant	see visitor study from Kings Lynn and West Norfolk
228	Godmanchester North of Clyde Farm	39	40		no access	no impact	no impact on tourist site	no impact on interest feature	no impact
185	Bury, East of Valiant Square	88	29		no access	no impact	no impact on tourist site	no impact on interest feature	no impact
220	Little Paxton, north of St James Road to north of High Street	34	43		no access	no impact	no impact on tourist site	no impact on interest feature	no impact
226	Buckden, East of Silver Street	247	38	long distance makes likely number of extra visitors very small	no access	no impact	no impact on tourist site	no impact on interest feature	no impact
70	Kimbolton, north of Station Road/ Stowe Road	66	36		no access	no impact	no impact on tourist site	no impact on interest feature	no impact
1	Somersham, east of Robert Avenue	74	39		no access	no impact	no impact on tourist site	no impact on interest feature	no impact
171	Somersham, College Farm, west of Newlands Industrial Estate	57	38		no access	no impact	no impact on tourist site	no impact on interest feature	no impact
35	Warboys, South of Stirling Close	49	34		no access	no impact	no impact on tourist site	no impact on interest feature	no impact
59	Alconbury, north of School Lane	95	30		no access	no impact	no impact on tourist site	no impact on interest feature	no impact

Allocation code	Allocation Name	Number of dwellings	Distance to Barnack	Barnack Hills and Holes (SAC)	Orton Pits (SAC)	Nene Washes (SAC,SPA, Ramsar)	Rutland Water (SPA, Ramsar)	Eversden and Wimpole Woods (SAC)	The Wash (SPA, Ramsar)
15	Bluntisham, north of 10 Station Road	29	42	long distance makes likely number of extra visitors very small	no access	no impact	no impact on tourist site	no impact on interest feature	no impact
157	Bluntisham, west of Longacres	150	41		no access	no impact	no impact on tourist site	no impact on interest feature	no impact
12	Great Staughton, between 20 Cage Hill and Averyhill	14	40		no access	no impact	no impact on tourist site	no impact on interest feature	no impact
50	Great Staughton, south of 29 Perry Road	20	40		no access	no impact	no impact on tourist site	no impact on interest feature	no impact

## Appendix 2.2 – Recreational impacts on the Upper Nene Valley Gravel Pits

To inform this priority issue Natural England commissioned a detailed survey of visitor access to the SPA through 2012-2013, conducted through face-to-face interview with visitors at several locations.. The interviews included a question on the postcode of the home origin of visitors; these were mapped at Map 14 of the report, as reproduced below. Statistical analysis of the distance travelled to reach the SPA is included in the report text.



*Figure 1 Distribution of home origins of visitors to the Upper Nene Valley Gravel Pits SPA, 2012-13 survey (Footprint Ecology, 2014)*

The survey results clearly show that almost all visitors to the SPA live within 20km of the site, and that very few of these visitors live in Huntingdonshire. The nearest new housing development allocation in the Huntingdonshire Local Plan (November 2017 version) lies 12.4 km from the nearest point of the Upper Nene Valley Gravel Pits SPA and this is the small development at Kimbolton. Since there is no known reason why the new residents of the proposed housing will show any behaviours different from those of current Huntingdonshire and Northamptonshire residents, it can be concluded that few of them will visit the SPA to add to the recreational pressures on the site.

## Appendix 3 – Screening for Development Allocations in HLP2036 for Water Related Threats

Allocation code	Allocation Name	Number of dwellings	Wastewater Treatment Works	Comment from Development Guidance in HLP2036 dated 21/11/2016	Amendment required to protect Ouse Washes and/or Portholme
228	Godmanchester North of Clyde Farm	39	Huntingdon	The policy requires agreement with the Environment Agency and Anglian Water Services that the waste water flows from proposed development can be accommodated and that meeting the requirements of the Water Framework Directive would not be compromised. It is expected that the Huntingdon Waste water Treatment Works (WwTW) will serve this Strategic Expansion Location, although alternative solutions may be available. The WwTW has available flow headroom in its existing discharge consent and can accept proposed growth in its catchment up until approximately 2021/22 or 5,100 homes, based on estimated growth trajectories from 2013. After this unless additional headroom becomes available an increased discharge consent and process upgrades at the WwTW will be necessary. Interim treatment solutions may be necessary until a permanent treatment solution is put in place.	.None
185	Bury, East of Valiant Square	88	Ramsey	Ramsey WWTW currently has no headroom. The detailed WCS recommends limiting development, site specific investigation and/or other interim solutions until such time as more headroom is available	None
220	Little Paxton, north of St James Road to north of High Street	34	St Neots	St Neots WWTW currently has no headroom. The detailed WCS recommends limiting development, site specific investigation and/or other interim solutions until such time as more headroom is available	None
226	Buckden, East of Silver Street	247	Buckden	Buckden WWTW currently has no headroom. The detailed WCS recommends limiting development, site specific investigation and/or other interim solutions until such time as more headroom is available	None
070	Kimbolton, north of Station Road/ Stowe Road	66	Kimbolton		None
001	Somersham, east of Robert Avenue	74	Somersham		
171	Somersham, College Farm, west of Newlands Industrial Estate	57	Somersham	Somersham WWTW currently has no headroom. The detailed WCS recommends limiting development, site specific investigation and/or other interim solutions until such time as more headroom is available	None
035	Warboys, South of Stirling Close	49	Oldhurst	Oldhurst WWTW currently has no headroom. The detailed WCS recommends limiting development, site specific investigation and/or other interim solutions until such time as more headroom is available	None

Allocation code	Allocation Name	Number of dwellings	Wastewater Treatment Works	Comment from Development Guidance in HLP2036 dated 21/11/2016	Amendment required to protect Ouse Washes and/or Portholme
059	Alconbury, north of School Lane	95			
015	Bluntisham, north of 10 Station Road	29			
157	Bluntisham, west of Longacres	150		This land was not assessed in the Detailed WCS. Taking a cautious approach it is assumed that some work may be necessary to ensure there would be no adverse impacts on the water supply and foul sewerage networks. A preplanning enquiry with Anglian Water Services will be required to confirm that these networks have capacity to accommodate development proposals at this site.	None
012	Great Staughton, between 20 Cage Hill and Averyhill	14			
050	Great Staughton, south of 29 Perry Road	20			

### Appendix 4- Impacts of increased recreation on the qualifying features of the European sites

Designated Site	Designation	Qualifying Feature Code	likely significant effect	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
			HLP2036 including new allocations y/n/no extra				
Portholme	SAC	H6510	y	n	y	y	Increased public use of Portholme could lead to added nutrients and ground disturbance and issues with the management of livestock on the site. Increased flytipping could cause chances of non-native species establishing
Ouse Washes	SPA	A037, A038, A050, A051 (Non-breeding), A051 (Breeding), A052, A053, A054, A055, A056 (Non-breeding), A056 (Breeding), A059, A082, A119, A151 (Non-breeding), A151 (Breeding), A156a (Non-breeding), A156a (Breeding)	y	n	n	n	The new allocations at Bluntisham and Somersham will increase the recreational use of the banks of the Ouse Washes near Earith but this area is a large distance from the area predominantly used these features and no impact is predicted.
		Waterbird Assemblage	y	n	n	n	



Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
		Breeding bird Assemblage	y	n	n	n	The new allocations at Bluntisham and Somersham will increase the recreational use of the banks of the Ouse Washes near Earith but this area is a large distance from the area predominantly used these features and no impact is predicted.
Ouse Washes	SAC	S1149	y	n	n	n	The new allocations at Bluntisham and Somersham will increase the recreational use of the banks of the Ouse Washes near Earith but this should not affect the qualifying feature. There are no data on river traffic
Woodwalton Fen	part of Fenland SAC	H6410	n	n	n	n	Although access to the Great Fen will be encouraged , dogs will still not be permitted in Woodwalton Fen and pollution from this source will not occur. Management of paths will ensure no lasting erosion damage takes place.
		H7210	n	n	n	n	Although access to the Great Fen will be encouraged , dogs will still not be permitted in Woodwalton Fen and pollution from this source will not occur. Management of paths will ensure no lasting erosion damage takes place.
		S1149	n	n	n	n	Although access to the Great Fen will be encouraged it should have no effect on this species.

Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
Woodwalton Fen		S1166	n	n	n	n	Although access to the Great Fen will be encouraged it should have no effect on this species.
Rutland Water	SPA	A005, A036, A050, A051, A052, A056, A061, A067, A070, A125	n	n	n	n	Although it is possible there will be more visitors to Rutland Water the numbers will not have a significant impact
		Waterbird Assemblage	n	n	n	n	Although it is possible there will be more visitors to Rutland Water the numbers will not have a significant impact
Orton Pit	SAC	H3140	n	n	n	n	No public access
		S1166	n	n	n	n	No public access
Nene Washes	SPA	A037, A050, A051 (Non-breeding), A051 (Breeding), A052, A054, A055, A056 (Non-breeding), A056 (Breeding), A119, A151 (Non-Breeding), A151 (Breeding), A156a Waterbird assemblage	n n	n n	n n	n n	It is unlikely that there will be noticeable increased recreational use of the Nene Washes from HLP2036. There are no data on river traffic

Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
Nene Washes	SAC	S1149	n	n	n	n	It is unlikely that there will be noticeable increased recreational use of the Nene Washes from HLP2036. There are no data on river traffic
Eversden and Wimpole Woods	SAC	S1308	y	y	y	n	Although there may be increased numbers of people that will have a negative impact on the site it will not affect the bats
Barnack Hills and Holes	SAC	H6210	n	n	n	n	The number of visitors to Barnack is not likely to increase due to HLP2036
The Wash	SPA	A054, A050, A051, A040, A169, A675, A067, A144, A672, A143, A037, A130, A157, A616, A065, A160, A141, A195, A193, A048, A162	n	n	n	n	It is unlikely that there will be noticeable increased recreational use of the The Wash from HLP2036. There are no data on river traffic
		Waterfowl assemblage	n	n	n	n	It is unlikely that there will be noticeable increased recreational use of the The Wash from HLP2036. There are no data on river traffic
Upper Nene Valley Gravel Pits	SPA/Ramsar	A056,A050,A053,A051,A059, A061,A021,A125,A017,A140, A005,A142	n	y	n	n	Although there may be some extra visitors. A study has shown very few current visitors venture here from Huntingdonshire and no reason to think they might in future

Appendix 5 – Impacts of human induced changes in hydraulic conditions (drought)

Designated Site	Designation	Qualifying Feature Code	likely significant effect of new allocations to HLP2036 y/n/no extra	Cumulative HLP2036 and other LPs y/n/no extra	Impact on site possible?	Impact on habitat or qualifying feature? y/n/no extra	rationale for verdict
Portholme	SAC	H6510	n	n	n	n	water supplies are to come from reservoirs not River Ouse. Climate change is a bigger driver
Ouse Washes	SPA	A037, A038, A050, A051 (Non-breeding), A051 (Breeding), A052, A053, A054, A055, A056 (Non-breeding), A056 (Breeding), A059, A082, A119, A151 (Non-breeding), A151 (Breeding), A156a (Non-breeding), A156a (Breeding)	n	n	n	n	water supplies are to come from reservoirs not River Ouse. Climate change is a bigger driver
		Waterbird Assemblage	n	n	n	n	water supplies are to come from reservoirs not River Ouse. Climate change is a bigger driver
		Breeding bird Assemblage	n	n	n	n	water supplies are to come from reservoirs not River Ouse. Climate change is a bigger driver

Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
Ouse Washes	SAC	S1149	n	n	n	n	water supplies are to come from reservoirs not River Ouse. Climate change is a bigger driver
Woodwalton Fen	part of Fenland SAC	H6410	n	n	n	n	water supplies are to come from reservoirs not River Ouse or Nene. Climate change is a bigger driver
		H7210	n	n	n	n	water supplies are to come from reservoirs not River Ouse or Nene. Climate change is a bigger driver
		S1149	n	n	n	n	water supplies are to come from reservoirs not River Ouse or Nene. Climate change is a bigger driver
		S1166	n	n	n	n	water supplies are to come from reservoirs not River Ouse or Nene. Climate change is a bigger driver
Rutland Water	SPA	A005, A036, A050, A051, A052, A056, A061, A067, A070, A125	n	n	n	n	water supplies are to come from reservoirs not River Ouse. Climate change is a bigger driver. It is not clear what the impacts of long-term drought would be on the reservoir.

Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
Rutland Water		Waterbird Assemblage	n	n	n	n	water supplies are to come from reservoirs not River Ouse. Climate change is a bigger driver. It is not clear what the impacts of long-term drought would be on the reservoir.
Orton Pit	SAC	H3140	n	n	n	n	water supplies are to come from reservoirs not River Nene. Climate change is a bigger driver
		S1166	n	n	n	n	water supplies are to come from reservoirs not River Nene. Climate change is a bigger driver
Nene Washes	SPA	A037, A050, A051 (Non-breeding), A051 (Breeding), A052, A054, A055, A056 (Non-breeding), A056 (Breeding), A119, A151 (Non-Breeding), A151 (Breeding), A156a	n	n	n	n	water supplies are to come from reservoirs not River Nene. Climate change is a bigger driver
		Waterbird assemblage	n	n	n	n	water supplies are to come from reservoirs not River Nene. Climate change is a bigger driver

Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
Nene Washes	SAC	S1149	n	n	n	n	water supplies are to come from reservoirs not River Nene. Climate change is a bigger driver
Eversden and Wimpole Woods	SAC	S1308	n	n	n	n	Not connected to systems affected by water abstraction
Barnack Hills and Holes	SAC	H6210	n	n	n	n	Not connected to systems affected by water abstraction
The Wash	SPA	A054, A050, A051, A040, A169, A675, A067, A144, A672, A143, A037, A130, A157, A616, A065, A160, A141, A195, A193, A048, A162	n	n	n	n	water supplies are to come from reservoirs not River Ouse or Nene. Climate change is a bigger driver. Sea-level rise of most relevance
		Waterfowl assemblage	n	n	n	n	water supplies are to come from reservoirs not River Ouse or Nene. Climate change is a bigger driver. Sea-level rise of most relevance
Upper Nene Valley Gravel Pits	SPA/Ramsar	A056,A050,A053,A051,A059, A061,A021,A125,A017,A140, A005,A142	n	n	n	n	Huntingdonshire will not affect water supplies in this catchment.

Appendix 6 – Impacts of human induced changes in hydraulic conditions (flooding)

Designated Site	Designation	Qualifying Feature Code	likely significant effect of new allocations to 4 HLP2036 y/n/ no extra	Cumulative HLP2036 and other LPs y/n/no extra	Impact on site possible? y/n	Impact on habitat or qualifying feature? y/n/no extra	rationale for verdict
Portholme	SAC	H6510	y/no extra	y/no extra	n	n	Occasional extreme flooding predicted by climate change (much bigger driver than urban development) scenarios, where SuDS are overwhelmed could affect flooding of Portholme. The quantity of water from extra flooding every 5 to 10 years would not be detrimental to the meadow as long as <i>Rumex</i> species can be controlled. Water quality is a more important driver for this plant community.
Ouse Washes	SPA	A037, A038, A050, A051 (Non-breeding), A052, A053, A054, A055, A056 (Non-breeding), A059, A119, A156a (Non-breeding)	y/no extra	y/no extra	y/no extra	n	Extra depth of winter flooding not considered a threat to these species.
		A051 (Breeding), A055 (Breeding), A119 (Breeding), A156a (Breeding)	y/no extra	y/no extra	y/no extra	y/no extra	Great Ouse CFMP acknowledges possibility of flooding in late spring into late summer because the Ouse Washes are used as part of the flood defence for property and agricultural land. This could negatively affect breeding. Some of the flooding could be attributable to development but most is due to climate change.



Designated Site	Designation	Qualifying Feature Code	likely significant effect		Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
			HLP2036 including new allocations	Cumulative HLP2036 and other LPs			
Ouse Washes		A082	y/no extra	y/no extra	y/no extra	y/no extra	extra flooding could lead to a reduction in prey Extra flooding not seen as problem for this species as it uses lagoons outside of the Ouse Washes.
		A151 (Breeding)	y/no extra	y/no extra	y/no extra	n	
		A156a	y/no extra	y/no extra	y/no extra	y/ no extra	Great Ouse CFMP acknowledges possibility of flooding in late spring into late summer because the Ouse Washes are used as part of the flood defence for property and agricultural land. This could negatively affect breeding. Some of the flooding could be attributable to development but most is due to climate change. Flooding in late spring into late summer could negatively affect breeding
		Waterbird Assemblage	y/no extra	y/no extra	y/no extra	y/no extra	Overriding effect will come from climate change but any extra flooding in summer will affect species assemblage of waterbirds
		Breeding Bird Assemblage	y/no extra	y/no extra	y/no extra	y/no extra	Overriding effect will come from climate change but any extra flooding in summer will affect species assemblage of breeding birds It is unlikely that any additional flooding on top of that caused by climate change will affect this species
	SAC	S1149	n	n	n	n	
Woodwalton Fen	part of Fenland SAC	H6410	n	n	n	n	Woodwalton Fen will not be noticeably affected by HLP2036 as it is in the Nene catchment/Middle Level Commission. Any increased flow from development in Ramsey as identified in the WCS (Dec, 2014) will be away from Woodwalton Fen.

Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
Woodwalton Fen		H7210	n	n	n	n	Woodwalton Fen will not be noticeably affected by HLP2036 as it is in the Nene catchment/Middle Level Commission. Note that this community is not found at Woodwalton Fen.
		S1149	n	n	n	n	Woodwalton Fen will not be noticeably affected by HLP2036 as it is in the Nene catchment/Middle Level Commission. Any increased flow from development in Ramsey as identified in the WCS (Dec, 2014) will be away from Woodwalton Fen.
		S1166	n	n	n	n	Woodwalton Fen will not be noticeably affected by HLP2036 as it is in the Nene catchment/Middle Level Commission. Any increased flow from development in Ramsey as identified in the WCS (Dec, 2014) will be away from Woodwalton Fen.
Rutland Water	SPA	A005, A036, A050, A051, A052, A056, A061, A067, A070, A125	n	n	n	n	Rutland Water will not be affected by HLP2036 as it is not in the same catchment as the developments
		Waterbird Assemblage	n	n	n	n	Rutland Water will not be affected by HLP2036 as it is not in the same catchment as the developments
Orton Pit	SAC	H3140	n	n	n	n	Orton Pits will not be affected by HLP2036 as it is not in the same catchment as the developments

Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
Orton Pit		S1166	n	n	n	n	Orton Pits will not be affected by HLP2036 as it is not in the same catchment as the developments
Nene Washes	SPA	A037, A050, A051 (Non-breeding), A051 (Breeding), A052, A054, A055, A056 (Non-breeding), A056 (Breeding), A119, A151 (Non-Breeding), A151 (Breeding), A156a	n	n	n	n	The Nene Washes will not be affected by any extra flooding caused by HLP2036 as they are in a different catchment. This assumes any waste water from Alconbury Hill and Wyton on the Hill is directed towards the Ouse
		Waterbird Assemblage	n	n	n	n	The Nene Washes will not be affected by any extra flooding caused by HLP2036 as they are in a different catchment. This assumes any waste water from Alconbury Hill and Wyton on the Hill is directed towards the Ouse
	SAC	S1149	n	n	n	n	The Nene Washes will not be affected by any extra flooding caused by HLP2036 as they are in a different catchment. This assumes any waste water from Alconbury Hill and Wyton on the Hill is directed towards the Ouse
Eversden and Wimpole Woods	SAC	S1308	n	n	n	n	These woods will not be affected by flooding

Designated Site	Designation	Qualifying Feature Code	likely significant effect	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
			HLP2036 including new allocations				
Barnack Hills and Holes	SAC	H6210	n	n	n	n	These grasslands will not be affected by flooding
The Wash	SPA	A054, A050, A051, A040, A169, A675, A067, A144, A672, A143, A037, A130, A157, A616, A065, A160, A141, A195, A193, A048, A162	n	n	n	n	The Wash will not be affected by any greater flooding caused by HLP2036. Any serious flooding will be climate change/weather driven
		Wildfowl Assemblage	n	n	n	n	The Wash will not be affected by any greater flooding caused by HLP2036. Any serious flooding will be climate change/weather driven
Upper Nene Valley Gravel Pits	SPA/Ramsar	A056,A050,A053,A051,A059, A061,A021,A125,A017,A140, A005,A142	n	n	n	n	This area is upstream and in a different catchment to Huntingdonshire

Appendix 7 – Impacts of invasive non-native species on the qualifying features of the European sites

Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations y/n/no extra	Cumulative HLP2036 and other LPs y/n/ no extra	Impact on site possible? y/n/no extra	Impact on habitat or qualifying feature? y/n/no extra	rationale for verdict
Portholme	SAC	H6510	y/no extra	n	y/no extra	y/no extra	waterborne seeds could establish on the meadow but this would not be due to HLP2036 or other plans. Fly-tipping covered in recreation section (Appendix 3) could cause an effect.
Ouse Washes	SPA	A037, A038, A050, A051 (Non-breeding), A051 (Breeding), A052, A053, A054, A055, A056 (Non-breeding), A056 (Breeding), A059, A082, A119, A151 (Non-breeding), A151 (Breeding), A156a (Non-breeding), A156a (Breeding)	n	n	n	n	No non-native species likely to be due to development could have an effect
		Waterbird Assemblage	n	n	n	n	No non-native species likely to be due to development could have an effect

Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
		Breeding bird Assemblage	n	n	n	n	No non-native species likely to be due to development could have an effect
Ouse Washes	SAC	S1149	n	n	n	n	No non-native species likely to be due to development could have an effect
Woodwalton Fen	part of Fenland SAC	H6410	n	n	n	n	Waterborne seeds could establish here but this would not be due to HLP2036 or other plans.
		H7210	n	n	n	n	NB - this community is not at Woodwalton Fen.
		S1149	n	n	n	n	No non-native species likely to be due to development could have an effect
		S1166	n	n	n	n	No non-native species likely to be due to development could have an effect
Rutland Water	SPA	A005, A036, A050, A051, A052, A056, A061, A067, A070, A125	n	n	n	n	No non-native species likely to be due to development could have an effect

Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
Rutland Water		Waterbird Assemblage	n	n	n	n	No non-native species likely to be due to development could have an effect
Orton Pit	SAC	H3140	n	n	n	n	No non-native species likely to be due to development could have an effect
		S1166	n	n	n	n	No non-native species likely to be due to development could have an effect
Nene Washes	SPA	A037, A050, A051 (Non-breeding), A051 (Breeding), A052, A054, A055, A056 (Non-breeding), A056 (Breeding), A119, A151 (Non-Breeding), A151 (Breeding), A156a	n	n	n	n	No non-native species likely to be due to development could have an effect
		Waterbird assemblage	n	n	n	n	No non-native species likely to be due to development could have an effect
	SAC	S1149	n	n	n	n	No non-native species likely to be due to development could have an effect
Eversden and Wimpole Woods	SAC	S1308	n	n	n	n	No non-native species likely to be due to development could have an effect

Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
Barnack Hills and Holes	SAC	H6210	n	n	n	n	No non-native species likely to be due to development could have an effect
The Wash	SPA	A054, A050, A051, A040, A169, A675, A067, A144, A672, A143, A037, A130, A157, A616, A065, A160, A141, A195, A193, A048, A162	n	n	n	n	No non-native species likely to be due to development could have an effect
		Wildfowl Assemblage	n	n	n	n	No non-native species likely to be due to development could have an effect
Upper Nene Valley Gravel Pits	SPA/Ramsar	A056,A050,A053,A051,A059, A061,A021,A125,A017,A140, A005,A142	n	n	n	n	No non-native species likely to be due to development could have an effect



Appendix 8 – Impacts of pollution to groundwater on qualifying features of the European sites

Designated Site	Designation	Qualifying Feature Code	likely significant effect	Cumulative	Impact	Impact	rationale for verdict
			HLP2036 including new allocations y/n/no extra	HLP2036 and other LPs y/n/no extra	on site possible? y/n/no extra	on habitat or qualifying feature? y/n/no extra	
Portholme	SAC	H6510	n	n	n	n	Although there is a possibility of groundwater pollution from large developments or road accidents it is highly unlikely that this could affect Portholme.
Ouse Washes	SPA	A037, A038, A050, A051 (Non-breeding), A051 (Breeding), A052, A053, A054, A055, A056 (Non-breeding), A056 (Breeding), A059, A082, A119, A151 (Non-breeding), A151 (Breeding), A156a (Non-breeding), A156a (Breeding)	n	n	n	n	Although there is a possibility of groundwater pollution from large developments or road accidents it is highly unlikely that this could affect this species in the long-term.

Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
		Waterbird Assemblage	n	n	n	n	Although there is a possibility of groundwater pollution from large developments or road accidents it is highly unlikely that this could affect this species in the long-term.
		Breeding Bird Assemblage	n	n	n	n	Although there is a possibility of groundwater pollution from large developments or road accidents it is highly unlikely that this could affect this species in the long-term.
Ouse Washes	SAC	S1149	n	n	n	n	Although there is a possibility of groundwater pollution from large developments or road accidents which could cause large scale mortality it is considered highly unlikely.
Woodwalton Fen	part of Fenland SAC	H6410	n	n	n	n	Although there is a possibility of groundwater pollution from large developments (Alconbury Airfield) or road accidents it is highly unlikely that this could affect this habitat in the long-term.
		H7210	n	n	n	n	Although there is a possibility of groundwater pollution from large developments (Alconbury Airfield) or road accidents it is highly unlikely that this could affect this species in the long-term. NB this community is not found at Woodwalton Fen.

Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
		S1149	n	n	n	n	Although there is a possibility of groundwater pollution from large developments (Alconbury Airfield) or road accidents it is highly unlikely that this could affect this habitat in the long-term.
Woodwalton Fen		S1166	n	n	n	n	Although there is a possibility of groundwater pollution from large developments (Alconbury Airfield) or road accidents it is highly unlikely that this could affect this habitat in the long-term.
Rutland Water	SPA	A005, A036, A050, A051, A052, A056, A061, A067, A070, A125	n	n	n	n	This site is too remote from HLP2036 to be affected
		Waterbird Assemblage	n	n	n	n	This site is too remote from HLP2036 to be affected
Orton Pit	SAC	H3140	n	n	n	n	This site is too remote from HLP2036 to be affected

Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
Orton Pit		S1166	n	n	n	n	This site is too remote from HLP2036 to be affected
Nene Washes	SPA	A037, A050, A051 (Non-breeding), A051 (Breeding), A052, A054, A055, A056 (Non-breeding), A056 (Breeding), A119, A151 (Non-Breeding), A151 (Breeding), A156a	n	n	n	n	Although there is a possibility of groundwater pollution from large developments (Alconbury Airfield or Wyton on the Hill could flow to the Nene Washes eventually) or road accidents it is highly unlikely that this could affect this species in the long-term.
		Waterbird Assemblage	n	n	n	n	Although there is a possibility of groundwater pollution from large developments (Alconbury Airfield or Wyton on the Hill could flow to the Nene Washes eventually) or road accidents it is highly unlikely that this could affect this assemblage in the long-term.
	SAC	S1149	n	n	n	n	Although there is a possibility of groundwater pollution from large developments (Alconbury Airfield or Wyton on the Hill could flow to the Nene Washes eventually) or road accidents it is highly unlikely that this could affect this assemblage in the long-term.

Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
Eversden and Wimpole Woods	SAC	S1308	n	n	n	n	This site could not be affected
Barnack Hills and Holes	SAC	H6210	n	n	n	n	This site could not be affected
The Wash	SPA	A054, A050, A051, A040, A169, A675, A067, A144, A672, A143, A037, A130, A157, A616, A065, A160, A141, A195, A193, A048, A162	n	n	n	n	Although there is a possibility of groundwater pollution from large developments or road accidents it is highly unlikely that this could affect this species in the long-term because of dilution before it reaches the Wash.
		Wildfowl Assemblage	n	n	n	n	Although there is a possibility of groundwater pollution from large developments or road accidents it is highly unlikely that this could affect this species in the long-term.
Upper Nene Valley Gravel Pits	SPA/Ramsar	A056,A050,A053,A051,A059, A061,A021,A125,A017,A140, A005,A142	n	n	n	n	Not possible as there is no connection between Huntingdon developments and the groundwater of this site.

Appendix 9 – Impacts of the reduction in water quality on the qualifying features of the European sites

Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations y/n/no extra	Cumulative HLP2036 and other LPs y/n/no extra	Impact on site possible? y/n/no extra	Impact on habitat or qualifying feature? y/n/no extra	rationale for verdict
Portholme	SAC	H6510	y/no extra	y/no extra	y/no extra	y/no extra	<i>Increased pollution from floodwater when SuDS upstream of Huntingdon (including St Neots) are overtopped could be detrimental to this site. The capacity of WwTWs along the River Great Ouse needs to be addressed. If exceeded levels of phosphates could increase in water flooding Portholme threatening the qualifying plant community. The Great Ouse CFMP (2010 Table B10) does not discount the possibility that pollution may increase due to development. The WCS for Huntingdonshire (URS 2014) notes that there is a threat from wastewater to the European sites. It must be assumed that the consenting authority will work with Anglian Water Services to ensure that increased pollution from WwTWs does not occur upstream of Portholme. Use of SUDS will reduce the likelihood of pollutants reaching the WwTWs in the first place. This is linked to flooding and so climate change is a major driver too. Currently floodwater to the site seldom comes from the river channel but from run-off from the land.</i>

Designated Site	Designation	Qualifying Feature Code	likely significant effect		Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
			HLP2036 including new allocations	Cumulative HLP2036 and other LPs			
Ouse Washes	SPA	A037, A038, A050, A051 (Non-breeding), A051 (Breeding), A052, A053, A054, A055, A056 (Non-breeding), A056 (Breeding), A059, A082, A119, A151 (Non-breeding), A151 (Breeding), A156a (Non-breeding), A156a (Breeding)	y/no extra	y/no extra	y/no extra	n	<i>Increased pollution from floodwater when SuDS upstream of Huntingdon (including St Neots) are overtopped could be detrimental to this site. The capacity of WwTWs along the River Great Ouse needs to be addressed (see WCS for Huntingdon, URS, 2014) if they are likely to be exceeded. However, phosphate and nitrates not likely to affect these bird species directly. Impacts on the supporting vegetation (Ramsar objectives) may be negative. We must assume consenting authority will work with Anglia Water Services to ensure WwTWs are sufficient.</i>
		Waterbird assemblage	y/no extra	y/no extra	y/no extra	n	<i>Increased pollution from floodwater when SUDS or WwTWs are overtopped could be detrimental to this site.</i>
		Breeding bird assemblage	y/no extra	y/no extra	y/no extra	n	<i>Increased pollution from floodwater when SUDS or WwTWs are overtopped could be detrimental to this site.</i>

Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
Ouse Washes	SAC	S1149	y/no extra	y/no extra	y/no extra	y/no extra	<i>Increased pollution from floodwater when SUDS upstream of Huntingdon (including St Neots) are overtopped could be detrimental to this site. The capacity of WwTWs along the River Great Ouse needs to be addressed (see WCS for Huntingdon, URS, 2014) if they are likely to be exceeded. Assume consenting authority will ensure WwTWs are adequate. However, phosphate and nitrates not likely to affect these bird species directly. Impacts on the supporting vegetation (Ramsar objectives) and macrophytes may be negative.</i>
Woodwalton Fen	part of Fenland SAC	H6410	n	n	n	n	Not directly linked to development sites
		H7210	n	n	n	n	Not directly linked to development sites
		S1149	n	n	n	n	Not directly linked to development sites
		S1166	n	n	n	n	Not directly linked to development sites
Rutland Water	SPA	A005, A036, A050, A051, A052, A056, A061, A067, A070, A125	n	n	n	n	Not directly linked to development sites
		Waterbird assemblage	n	n	n	n	Not directly linked to development sites



Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
Orton Pit	SAC	H3140	n	n	n	n	Not directly linked to development sites
		S1166	n	n	n	n	Not directly linked to development sites
Nene Washes	SPA	A037, A050, A051 (Non-breeding), A051 (Breeding), A052, A054, A055, A056 (Non-breeding), A056 (Breeding), A119, A151 (Non-Breeding), A151 (Breeding), A156a	n	n	n	n	Not directly linked to development sites. Assumes developments at Alcobury Airfield and Wyton on the Hill drain into Ouse
		Waterbird assemblage	n	n	n	n	Not directly linked to development sites. Assumes developments at Alcobury Airfield and Wyton on the Hill drain into Ouse
		S1149	n	n	n	n	Not directly linked to development sites. Assumes developments at Alcobury Airfield and Wyton on the Hill drain into Ouse
Eversden and Wimpole Woods	SAC	S1308	n	n	n	n	Not directly linked to development sites
Barnack Hills and Holes	SAC	H6210	n	n	n	n	Not directly linked to development sites

Designated Site	Designation	Qualifying Feature Code	likely significant effect HLP2036 including new allocations	Cumulative HLP2036 and other LPs	Impact on site possible?	Impact on habitat or qualifying feature?	rationale for verdict
The Wash	SPA	A054, A050, A051, A040, A169, A675, A067, A144, A672, A143, A037, A130, A157, A616, A065, A160, A141, A195, A193, A048, A162	y	y	y	y	very remote chance of pollution surge affecting the Wash
		Wildfowl Assemblage	y	y	y	y	very remote chance of pollution surge affecting the Wash
Upper Nene Valley Gravel Pits	SPA/Ramsar	A056,A050,A053,A051,A059, A061,A021,A125,A017,A140, A005,A142	n	n	n	n	No connection between the developments of Huntingdonshire and this European site as it is in another catchment and also upstream.

## Appendix 10 – Distances of Allocations to Eversden and Wimpole Woods SAC

Barbastelle Bats can forage up to 20km from the roosting sites. Natural England requested that this aspect be investigated for HLP2036. There is a published 'Area of Principal Importance' drawn for this species around the Eversden and Wimpole Woods SAC (South Cambridgeshire Biodiversity SPD, adopted 2009). None of this area is within Huntingdonshire. The new allocations at Godmanchester and Little Paxton are within 20km. It might be prudent to survey the large site at Buckden to ensure this field is not used by the Barbastelle Bats. However, the published study takes precedence over these figures and it is considered there will be no likely significant effects on the foraging grounds of the Barbastelle Bats from HLP2036.

Allocation Number	Allocation Name	Distance (km)
228	Godmanchester North of Clyde Farm	19
185	Bury, East of Valiant Square	30
220	Little Paxton, north of St James Road to north of High Street	17
226	Buckden, East of Silver Street	20
070	Kimbolton, north of Station Road/ Stowe Road	28
001	Somersham, east of Robert Avenue	25
171	Somersham, College Farm, west of Newlands Industrial Estate	25
035	Warboys, South of Stirling Close	26
059	Alconbury, north of School Lane	28
015	Bluntisham, north of 10 Station Road	21
157	Bluntisham, west of Longacres	22
012	Great Staughton, between 20 Cage Hill and Averyhill	23
050	Great Staughton, south of 29 Perry Road	24



Clare Bond  
Huntingdonshire District Council  
Planning Policy  
Pathfinder House  
St Mary's Street  
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PE29 3TN

**Our ref:** AC/2008/107417/SE-  
01/DS2-L01

**Your ref:**

**Date:** 30 November 2017

Dear Ms Bond

**HUNTINGDONSHIRE LOCAL PLAN TO 2036 DRAFT HABITATS REGULATIONS  
ASSESSMENT 2017, ADDENDUM**

Thank you for your e-mail dated 20 November 2017 and attached Habitats Regulations Assessments (HRA) addendum.

The addendum has concluded that the extra allocations added to the proposed submission of Local Plan and does not alter the outcomes on the previous report. As such we are happy with the outcomes of the addendum report and that our previous comments are reflected within it.

We hope this is of assistance to you.

Yours sincerely

**Mrs Dawn Porter**  
**Sustainable Places Planning Advisor**

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Date: 01 December 2017  
Our ref: 232636  
Your ref: [Click here to enter text.](#)



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**BY EMAIL ONLY**

Dear Ms Bond

**Huntingdonshire Local Plan to 2036 - Habitats Regulations Assessment 2017 a**

Thank you for seeking Natural England's views on the above in your email of 20 November 2017. Having been requested to provide feedback before 4 December we have not been given sufficient time to review the document in detail hence our comments below are limited to key points only.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England raised a number of issues on the draft Habitats Regulations Assessment (HRA) in our letter dated 2 March 2017 (ref. 207125). Natural England made further comments on matters needing to be addressed through the HRA in our recent responses to the draft Local Plan consultations. We trust that our advice / comments have been addressed in the main report.

We note that the 'Addendum to Final Report' (Bodsey Ecology, 16 November 2017) (the Addendum) primarily assesses whether delivery of an additional 962 dwellings (13 allocations) through the Local Plan changes the 'no likely significant effect' conclusion of the HRA with regard to potential impacts to European sites.

We welcome consideration of the potential impacts of allocations/development on Eversden and Wimpole Woods SAC supporting habitat for barbastelle bats, in accordance with Natural England advice. We agree with the findings of the assessment that allocations are unlikely to have any adverse impact on suitable barbastelle bat foraging habitat (which can be located up to ~ 20km from the SAC) except for the Little Paxton allocation which has a long woodland edge and is close to freshwater. We agree with the HRA recommendation that it would be prudent for a bat survey to be undertaken before this allocation progresses further, to determine likely impact to bats and in particular barbastelles associated with the Eversden and Wimpole Woods SAC. Natural England therefore advises that bat surveys are undertaken prior to this site being allocated to ensure that any adverse impacts can be adequately mitigated, to meet your authority's requirements under the Conservation (of Habitats and Species) Regulations 2010 (as amended).

From the detail provided we assume that the impacts of all allocations have now been considered, and not just those with >200 dwellings. However, it is not clear that the combined/cumulative effects of the allocations have been considered, particularly with regard to increased recreational pressure, as discussed below.

We welcome reference to the [Site Improvement Plans \(SIPs\)](#) for European sites in accordance with our previous advice.

### Recreational pressure

Section 2.3.2 of the Addendum states that the number of additional visitors to the European sites will not have a likely significant effect over and above those identified in the HRA because the number of extra visitors will be very small, given that the new allocations represent an increase of 4.7% on the number evaluated in the original HRA. Natural England's view is that this appears to be a considerable increase: whether it is significant or not requires detailed assessment and consideration of a range of criteria. The screening of allocations for recreational pressure is presented in Appendix 2. This uses a metric devised by Bodsey Ecology. This is a simplistic method based on size of proposed allocation and distance to European site, used to predict visitor numbers to the site. Whilst these factors are relevant, a whole range of additional criteria needed to inform an objective assessment have been omitted. It is claimed to be known that people will not travel long distances for casual recreation such as dog-walking; however, recent visitor studies (e.g. several undertaken by Footprint Ecology) to inform Local Plan preparation elsewhere, have indicated a minimum 8km catchment (in many cases, significantly greater) for regular visitors to honeypot destinations such as natures reserves and other designated sites. A detailed visitor study would need to be undertaken to identify the specific catchment area (zone of influence) for the European sites likely to be affected by the Huntingdonshire Local Plan. Criteria such as ease of access (by car, on foot), availability of parking, dog-walking facilities, accessibility, attractiveness, availability of alternative open access closer to the development, and range of additional factors, will all influence the extent of the catchment area for regular visitors to that site.

Related to the last point above, the draft Local Plan recognises recreational pressure as a risk to designated sites and proposes mitigation, through GI provision (including extension to Hinchingsbrooke Country Park) to address this. The HRA doesn't mention this. The HRA should assess the effects of all proposed development within the zone of influence for the European site and identify appropriate measures to adequately mitigate adverse effects. The application of the metric in Appendix 2, to individual allocations, has resulted in most of these allocations falling below the subjective 1% threshold. The combined effects of these developments are not considered. Our advice is that, in the absence of detailed visitor survey / assessment, the precautionary principle should be applied to the assessment of effects and identification of appropriate mitigation – in accordance with the requirements of the Habitats Regulations. As indicated in our response to the draft Local Plan, the HRA should assess whether mitigation currently proposed in the draft Local Plan is sufficient to absorb the additional pressure and demonstrate no adverse effect on the integrity of European sites or whether additional measures, such as developer contributions to fund additional green infrastructure provision and / or designated site management measures is required.

Notwithstanding the above, we appreciate Bodsey Ecology's efforts to assess the effects of recreational pressure in more detail, including consideration of visitor estimates through the ORVAL tool. We generally agree that recreational pressure impacts to the Ouse Washes, Woodwalton Fen, Nene Washes, Barnack Hills and Holes and Eversden and Wimpole Woods European sites can be screened as not significant, for the reasons described, and taking into consideration mitigation proposed through the draft Local Plan, which is not really considered.

Our outstanding concern therefore relates to Portholme SAC, a European site supporting sensitive floodplain meadow plant communities. There is already evidence that existing visitor levels are having an adverse effect on these features through trampling/damage to vegetation, conflicts between dogs and essential livestock grazing of the site, nutrient enrichment etc. The proposed level of development within the zone of influence for this popular recreation / dog-walking site, i.e. within easy car / walking distance will almost certainly contribute additional pressure and this has the potential to have an adverse impact to the qualifying / notified features of the SAC. The table in Appendix 2 indicates that the new allocations include ~ 300 additional dwellings within just 4km of Portholme SAC. This is equivalent to almost 1000 people / potential additional visitors. The other allocations in the Local Plan, within just 4km of the SAC, will result in substantially more potential additional visitors. We advise that further consideration of this should be included within the HRA: this should assess whether mitigation currently proposed in the draft Local Plan is sufficient to absorb the additional pressure and demonstrate no adverse effect on the integrity Portholme SAC or whether residual effects remains and therefore additional measures are needed - such as

developer contributions to fund additional green infrastructure provision and / or SAC management measures are required.

Section 2.2.4 of the Addendum indicates a conflict between the goals of the Green infrastructure policy and biodiversity goals, due to recreational pressures, and suggests that this is unavoidable. Natural England's advice is that any conflict should be avoidable if the impacts are thoroughly assessed through the HRA and SA, and any mitigation measures are secured through the relevant allocation policies in the Local Plan. The HRA and SA should inform Local Plan policies to ensure that sensitive habitats are adequately protected, buffered and enhanced to improve their resilience and sufficient additional / enhanced green infrastructure is provided to meet the recreational needs of the additional population. The Addendum states that the increase of visitors to the European sites from the allocations added to the HLP2036 between November 2016 and November 2017 will not increase the likely significant effect on them, with the exception of a new site in Bluntisham close to the Ouse Washes.

We agree with the recommendation that allocation(s) in Bluntisham should be subject to further investigation to assess impacts through increased recreational pressure on the Ouse Washes SAC/SPA/Ramsar site. Natural England advises that the assessment should consider impacts to Berry Fen Site of Special Scientific Interest (SSSI). Berry Fen provides functional land for overwintering wildfowl associated with the Ouse Washes, including Bewick's swans, which is particularly important when the Washes are too deeply flooded for them. The ornithological features of this site, including ground nesting birds and wintering waders and waterfowl, are particularly sensitive to disturbance by people and dogs. The site is popular with local dog-walkers and a public footpath heads along the floodbanks around and adjacent to the SSSI. Breeding and wintering birds are especially disturbed by people and dogs straying away from the footpath and through the site. Uncontrolled access into the SSSI can also have an adverse effect on the notified grassland features through trampling of vegetation and nutrient enrichment from dog-fouling. People and dogs can also conflict with the essential livestock grazing of the site, posing a risk to the long-term management of the site. The HRA should indicate that any allocation in this area will need to deliver sufficient mitigation to demonstrate no adverse effect to the Ouse Washes including the supporting habitat of Berry Fen. Appropriate mitigation is likely to require a combination of alternative accessible green infrastructure, particularly attractive to dog walkers, and implementation/ contribution towards implementation of designated site management measures.

We note that consideration of the effects of the Plan on the Upper Nene Valley Gravel Pits Special Protection Area (SPA) and Ramsar site has been included in the addendum, in line with our previous advice. Based on this information the HRA concludes that Local Plan development within the visitor catchment for the SPA will not generate significant levels of additional pressure at this site. Natural England accepts this conclusion.

#### Water quality

If we interpret section 2.3.4 correctly development in Somersham, Oldhurst and Ramsey will not be taken forward until sufficient waste water treatment capacity to adequately serve it can be demonstrated. We note that policies *LP5 – Waste Water* and *LP18 – Surface Water* have been amended, in accordance with our previous advice, to ensure delivery of such measures. We are satisfied that this will offer sufficient protection to the Ouse Washes SAC/SPA/Ramsar and Woodwalton Fen SAC.

Section 2.2.6 suggests that floodwater on Portholme SAC rarely originates from the River Great Ouse or the Alconbury Brook, but comes from the surrounding land as groundwater. It would be helpful to have confirmation from the Environment Agency that this is correct and that this minimises risk to the SAC from development upstream.

#### Air quality

In our previous response we advised that a requirement should be included in the relevant Local Plan policies to ensure proposals for major new developments are accompanied by transport assessments and that transport impacts close to designated sites will require an air quality assessment to demonstrate no adverse effect on sensitive features. Email correspondence from

Bodsey Ecology (22 March 2017) indicated 'we have added some text to ensure that whilst the transport strategy is not available then airborne pollution is considered'. It is still not clear from this how potential air quality impacts associated with major development will be assessed. Further clarification would be welcome.

We welcome that policy LP37 – Renewable and Low Carbon Energy has been amended in accordance with our previous advice to ensure proposals will not have any adverse effect on European sites.

We trust that the Environment Agency, Wildlife Trust and RSPB have been consulted for their views on relevant aspects of this assessment.

To summarise, our advice is that the HRA should be amended to provide further consideration of the recreational impacts of Plan allocations on Portholme SAC and mitigation measures to address adverse effects. The HRA should also address our advice above regarding the Bluntisham allocation and potential impacts to the Ouse Washes supporting habitat of Berry Fen SSSI. This is required in order to conclude that the Local Plan will not have an adverse effect on the integrity of European sites in accordance with the requirements of the Conservation (of Habitats and Species) Regulations 2010 (as amended). We will be pleased to comment on the further revised HRA.

We hope the above comments are helpful. For any queries relating to the specific advice in this letter only please contact Janet Nuttall on 020 802 65894. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

**Janet Nuttall**  
**Sustainable Land Use Adviser**