



Greater Cambridge Local Plan

SA Addendum

Sustainability Commentary on Emerging
Alternative Development Strategy Options

**Cambridge City Council and South
Cambridgeshire District Council**

Prepared by LUC
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Greater Cambridge Local Plan SA Addendum

Introduction

1.1 This SA Addendum has been prepared and published alongside the Councils' Development Strategy Update Report. The Development Strategy Update Report sets out new objectively assessed needs, summarises ongoing changes in regional water resources planning and outlines their associated housing delivery implications. The issues are influencing options and decisions on the Greater Cambridge Draft Local Plan's development strategy.

1.2 There is ongoing uncertainty with regards to water supply and associated housing delivery in Greater Cambridge. Consequently, it is not possible to be sure which new options for growth are likely to be deliverable and hence which can be considered reasonable alternatives for the purposes of the SA. The purpose of this SA addendum is therefore to start to consider the sustainability implications of the potential reasonable alternatives for growth. This will help to inform the definition of new reasonable growth options for Greater Cambridge once evidence on matters affecting deliverability (such as water resource availability and achievable housing delivery rates) becomes more certain.

1.3 This SA addendum and the Development Strategy Update Report therefore represent an interim stage in the preparation of the Greater Cambridge Draft Local Plan and its SA. As an interim stage in the Local Plan preparation process, it is not proposed to carry out public consultation, including in respect of this addendum. Once there is greater certainty on the quantum of water supply, associated infrastructure and housing delivery over the new Greater Cambridge plan period the Council will be in a better position to define the realistic choices available to it regarding growth in the plan period. These will then be subject to SA, with the results helping to inform the development strategy to be proposed in the Draft Local Plan and accompanying SA Report that will be subject to public consultation in 2023.

1.4 This SA addendum has been prepared by LUC on behalf of Cambridge City Council and South Cambridgeshire District Council (the Councils) as part of the Sustainability Appraisal (SA) of the Greater Cambridge Local Plan. The SA

addendum builds on the Greater Cambridge Local Plan: First Proposals Sustainability Appraisal consulted on in November and December 2021 and should be read in conjunction with that document as well as the First Proposals document. Further stages of the SA, and further public consultation, will follow as the Local Plan preparation progresses.

Changes in Local Plan evidence

Objectively assessed needs update

1.5 The Councils updated the Local Plan employment evidence and housing and employment relationships evidence in 2022 to consider the latest employment and demographic data and the effects of the COVID-19 pandemic. This included identifying an updated minimum homes requirement calculated by the government's Standard Method and the number of jobs that these homes would support, alongside exploring the most likely future jobs forecasts and the homes these would require.

1.6 Reviewing the latest data identified that the COVID-19 pandemic led to a fall in employment in the construction, retail, food and accommodation, and the arts and recreation sectors, but investment-led, knowledge intensive sectors such as life science and ICT have generally remained resilient or seen growth.

1.7 In addition, the 2021 Census showed that population growth in Cambridge has been significantly higher than previously estimated.

1.8 Having considered this evidence and having regard to the obligation in the NPPF paragraph 81 to support economic growth and productivity, the most likely need for jobs in Greater Cambridge in the plan period (2020-2041) is an additional 66,600 jobs. The Standard Method minimum housing number falls well short of supplying housing to support this higher job forecast. Consequently, the objectively assessed need for housing for the plan period has been amended to support the most likely future level of jobs. This is a figure of 2,463 homes per year, which would translate to 51,723 homes in the plan

period (2020-41). Table 1 shows the difference between the identified growth included in the Greater Cambridge Local Plan: First Proposals, subjected to SA in 2021, and the new growth figures informed by several years of additional data.

Table 1: Updated objectively assessed needs for jobs and homes

	2021 Jobs	2022 Jobs	Change	2021 Homes	2022 Homes	Change
Total in Greater Cambridge 2020-2041	58,500	66,600	+8,100	44,400 (rounded up)	51,723	+7,323
Annual Change	2,781	3,171	+390	2,111	2,463	+352

1.9 The 2021 annual change homes figure of 2,111 multiplied by 21 years within the plan period equals 44,331. For the First Proposals consultation this 21-year figure was rounded up to 44,400. Sustainability Appraisal of the medium+ growth option tested a rounded down 21-year plan period homes figure of 44,300. In this Addendum report, subsequent references to differences between 2021 figures and 2022 figures refer to the 44,300 medium+ growth option which was subject to SA testing.

1.10 The Councils are committed to plan positively to accommodate the updated employment and housing needs unless evidence identifies an insurmountable problem with achieving that in a sustainable way. The Councils have therefore started to re-evaluate how many jobs and homes can be reasonably delivered and accommodated in Greater Cambridge in the plan period, taking into account economic, social and environmental impacts, infrastructure constraints and Duty to Cooperate considerations.

Water supply update

1.11 A Draft Regional Water Resources Plan was published by Water Resources East in November 2022. The plan is clear that “Unless urgent action is taken by all sectors, the region will face severe water shortages. This will constrain agricultural production and curtail economic growth, affecting the region’s prosperity and endangering the east’s iconic chalk rivers, peatlands and wetlands.”

1.12 The main proposals in the Draft Regional Water Resources Plan are set in the context of a considerable reduction in abstraction licenses by the Environment Agency in Greater Cambridge, first to prevent further deterioration and then to restore the water environment, focusing first on protected sites. Further demand management measures and considerable expansion in supply capacity are also needed. The Regional Plan proposes a water transfer arrangement from Anglian Water to Cambridge Water in the medium term (from around 2030) and the delivery of a new Fens Reservoir in the long term (expected to be operational from around 2035-37 but not yet progressed to planning permission stage).

1.13 The draft Regional Plan advises that it is possible that water companies could look to seek a delay to licence cap reductions until later in the 2030s due to an overriding public interest case in providing secure water supplies. This is allowable under Regulation 19 of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017. However, at this point in time, it is not clear whether Cambridge Water will need to go down the route of seeking such a delay in reduction of abstraction, and even if they did, whether it would be successful.

1.14 Details on the quantum of water supply and how it relates to housing and employment growth needs will be provided by Cambridge Water’s emerging new Water Resources Management Plan. Until this Water Resources Management Plan is published, it is not clear whether water supply will be a constraint to growth in the short, medium or long term, and what the effect will be on supplying current growth commitments, the proposed growth levels in the

Greater Cambridge Local Plan: First Proposals (2021) and the now higher objectively assessed needs (2022).

1.15 Once Cambridge Water's Water Resource Management Plan is published, an update to the Councils' Water Cycle Strategy will be prepared to inform preparation of the Greater Cambridge Draft Local Plan.

Housing delivery update

1.16 The increase in housing need and the influence of potential water supply constraints and solutions on various stages of the plan period have implications for housing delivery. The Councils therefore commissioned their consultants to consider the housing delivery implications of the increased housing need, and this has been published as an Addendum (2022) to the earlier Housing Delivery Study (2021) and Interim Findings (2020).

1.17 The Housing Delivery Study (2021) found that the 2021 medium+ growth level that was included in the Greater Cambridge Local Plan: First Proposals as the objectively assessed need was deliverable. The assessment of the increased housing need (2022 medium growth level) is included in the Addendum (2022). It concludes that this new increased housing need would result in a material increase in annual housing completions from the First Proposals objectively assessed need and that it will require significant new sources of supply over and above the additional allocations proposed in the First Proposals. It therefore recommends that additional testing of spatial options (baskets of sites) is required to estimate at what level the housing requirement becomes unachievable. It also advises that a stepped housing requirement would be needed to allow time for:

- additional sites to be allocated, permitted and delivered through the new Greater Cambridge Local Plan, and
- necessary infrastructure to be developed, not least new water supply solutions in the medium to long term.

1.18 These two factors are likely to increase the annual level of housing completions that can be achieved in the middle and latter stages of the plan period. However, the assessment also highlights that:

- a diverse housing supply that is flexible to changing circumstances and less reliant on a smaller, more concentrated basket of sites is required to maximise market absorption, and
- a housing land supply that is more geographically spread would help to reduce competition, thus better matching the housing supply with demand, but that this brings its own challenges in terms of infrastructure delivery and sustainability, including climate change.

Emerging alternative development strategy options

1.19 Considering the evidence updates outlined above there is potential that the preparation and SA of the Greater Cambridge Draft Local Plan in 2023 will require consideration and appraisal of additional alternative growth options not previously subjected to SA, specifically development strategy options that:

1. Fully provide for the new objectively assessed job and housing needs: 66,600 jobs and 51,723 homes, equating to an uplift in growth of 8,200 jobs and 7,423 homes respectively over and above the preferred 'medium+' (First Proposals) growth spatial options appraised in 2021.
2. Only provide for a proportion of the new objectively assessed job and housing needs (which may or may not include meeting all of the previous First Proposals' needs) due to water supply and associated environmental constraints and housing deliverability constraints, particularly in the short to medium term.

Likely effects of emerging alternative development strategy options

1.20 There is currently too much uncertainty to determine whether the two emerging alternative development strategy options constitute reasonable alternatives requiring appraisal to the same level of detail as the development strategy options previously appraised through the SA, including identification of whether effects are likely to be significant. Considering this uncertainty, this SA addendum instead provides a short commentary on the likely direction of economic, social and environmental effects of the two emerging options.

1.21 The effects of the previously appraised Spatial Option 9 (the Greater Cambridge Local Plan: First Proposals preferred spatial strategy) have been set out below for reference only. At this point in time, Spatial Option 9 represents the most recent preferred spatial development strategy and therefore the most relevant point of comparison for considering the likely direction of effects for the two new emerging options.

1.22 Changes to the spatial distribution of growth set out under Spatial Option 9 would result in changes in identified effects, as shown by the differing effects identified for the other spatial options appraised in the SA Report accompanying the Greater Cambridge Local Plan: First Proposals. However, until such time as the Councils can determine that the emerging alternative options and their spatial implications are reasonable, judgements on the likely sustainability effects of the emerging alternative options are limited to the influence of their respective scales of growth on the effects recorded for the previously preferred spatial strategy (Spatial Option 9).

Effects of Spatial Option 9 identified in 2021 SA

1.23 Spatial Option 9 would deliver the previously preferred ‘medium+’ growth scenario of 58,500 jobs and 44,300 homes. This option would deliver a substantial amount of housing development within Cambridge city, particularly at North East Cambridge and densification of consented development at North West Cambridge and the Cambridge urban area. It also includes a substantial amount of housing development at Cambridge Airport and around Cambourne, with additional development within the ‘southern cluster’ and villages. This option also includes faster delivery rates at Northstowe and Waterbeach. This option focuses employment development at North East Cambridge, Cambridge Airport, Cambridge Biomedical Campus and Cambourne, although the majority of this is expected to come forward beyond the plan period. Additional rural employment locations are identified at Babraham and on the A14 corridor in vicinity of Swavesey Junction, as well as in the southern cluster and villages.

1.24 For ease of reference, Table 2 sets out the previously appraised effects of Spatial Option 9 that were included in the 2021 SA Report that accompanied the Greater Cambridge Local Plan: First Proposals consultation. The SA has sought to distinguish between short to medium term effects occurring within the plan period (referred to as ‘2020-2041’) and longer term/permanent effects that would occur when sites are fully built out (referred to as the ‘all time’ scenario or ‘fully built out’).

Table 2: Short to medium and long-term effects of Spatial Option 9

SA objectives	2020-2041	All time
SA objective 1: Housing	++?	++
SA objective 2: Access to services and facilities	+/-?	++/-?

SA objectives	2020-2041	All time
SA objective 3: Social inclusion and equalities	+/-	++/-
SA objective 4: Health	--/+	++/-
SA objective 5: Biodiversity and geodiversity	--/+?	--/+?
SA objective 6: Landscape and townscape	--/+?	--/+?
SA objective 7: Historic environment	-?	-?
SA objective 8: Efficient use of land	--/+?	--/+?
SA objective 9: Minerals	--?	--?
SA objective 10: Water	--/+?	++/--?
SA objective 11: Adaptation to climate change	+/-?	++/-?
SA objective 12: Climate change mitigation	++/--?	++/--
SA objective 13: Air pollution	++/--?	++/--
SA objective 14: Economy	+/-	++/-
SA objective 15: Employment	+/-	++/-

Likely effects of delivering 66,600 jobs and 51,723 homes in Greater Cambridge

1.25 The new objectively assessed needs represent an uplift in growth of 8,200 jobs and 7,423 homes over and above the preferred ‘medium +’ growth spatial option appraised in 2021.

1.26 More jobs and homes will generate similar positive effects against SA objectives 1 (Housing), 14 (Economy) and 15 (Employment) to those identified for Spatial Option 9 as they would still be delivering the scale of growth needed and no more, albeit that evidence now suggests that need is higher than was

thought when the First Proposals document was prepared. Supply would broadly meet demand in the long-term, delivering improvements in the affordability of homes and the same socio-economic effects previously recorded against SA objectives 3 (Social Inclusion and Equalities) and 4 (Health). However, the uplift in growth needs mean that Spatial Option 9 and any other spatial options delivering the previously preferred 'medium' or 'medium +' scale of growth no longer meet growth needs over the plan period and are therefore likely to perform less strongly against these same SA objectives, with fewer positive effects and potentially more negative effects.

1.27 Providing for more jobs and housing need will require more development, either through additional greenfield land take or the densification of existing and planned development (most likely a combination of the two). This increases the likelihood of negative effects against SA objectives 4 (Health), 11 (Adaptation to Climate Change), 12 (Climate Change Mitigation) and 13 (Air Pollution) as greater concentrations of people and development are likely to result in greater concentrations of air, noise and light pollution.

1.28 More development, particularly on more greenfield land, will also increase the likelihood of negative effects against SA objectives 5 (Biodiversity and Geodiversity), 6 (Landscape and Townscape), 7 (Historic Environment), 8 (Efficient Use of Land), 9 (Minerals) and 10 (Water). The greater the extent and scale of growth the greater the pressure on agricultural, mineral and water resources; all resources likely to be more in demand as the population rises. The greater the extent and scale of growth, the greater the potential for direct and indirect negative effects on the natural and historic environment, both at the local and landscape scale.

1.29 With regards to water supply, there is a significant risk that supply will not be able to meet demand in the short, medium and long term without causing further environmental harm, unless further demand management measures are employed, and additional sources of water secured as set out in the draft Regional Water Resources Plan. A new Fens Reservoir is planned, the delivery of which will meet long term water demands towards the end of the plan period and beyond; however, planning permission has yet to be secured for the reservoir, maintaining uncertainty on the effects for SA objectives 5 (Biodiversity

and Geodiversity), 6 (Landscape and Townscape), 7 (Historic Environment), 10 (Water) and 11 (Adaptation to Climate Change), particularly in the long term. A water transfer arrangement from Anglian Water to Cambridge Water has been proposed to meet demand in the medium term to accommodate reductions in abstraction licenses by the Environment Agency in Greater Cambridge first to prevent further deterioration of the water environment and then to restore the water environment, particularly protected sites.

1.30 If an overriding public interest case was made by the water company and approved by DEFRA, such that abstraction remained above the proposed reduced abstraction licences for longer, this would likely cause environmental harm and have negative effects against SA objectives 5 (Biodiversity and Geodiversity), 6 (Landscape and Townscape), 7 (Historic Environment), 10 (Water) and 11 (Adaptation to Climate Change). These negative effects could then have knock-on negative effects on SA objectives 3 (Social Inclusion and Equalities), 4 (Health) and 14 (Economy).

1.31 It is assumed that access to key services and facilities will be maintained, regardless of the scale of growth planned for, given access to existing centres will be prioritised. Larger scale growth would potentially put further pressure on the capacity of existing services and facilities, but it is assumed that additional provision would be required, commensurate with increased growth. In addition, greater growth would contribute to the economies of scale necessary to viably meet demand for new and improved services and facilities. Overall, effects in relation to SA objective 2 (Access to service and facilities) are likely to remain similar to those previously identified for Spatial Option 9.

1.32 It is noted, however, that housing delivery challenges associated with the new higher growth levels may require a spatial strategy that includes a wider range of sites and locations that could require more smaller sites in villages and a distribution of development less able to focus on locations with good access to services and facilities, including public transport. Such a spatial strategy would result in more development and road traffic in rural areas, likely generating negative effects against SA objectives 2 (Access to Services and Facilities), 3 (Social Inclusion and Equalities), 4 (Health), 5 (Biodiversity and Geodiversity), 6 (Landscape and Townscape), 7 (Historic Environment), 8

(Efficient Use of Land), 10 (Water), 11 (Adaptation to Climate Change), 12 (Climate Change Mitigation) and 13 (Air Pollution).

Likely effects of not fully providing for the new objectively assessed job and housing needs in Greater Cambridge

1.33 This emerging option would not fully meet growth needs over the plan period due to water supply and associated environmental constraints and housing deliverability constraints and associated implications for the spatial strategy, particularly in the short to medium term. The more limited the extent and scale of growth, the less pressure on agricultural, mineral and water resources. There would also be more limited direct and indirect negative effects on the natural and historic environment, both at the local and landscape scale, helping to avoid unacceptable environmental harm to the chalk aquifer and chalk streams in Greater Cambridge. This option would therefore reduce negative effects against SA objectives 5 (Biodiversity and Geodiversity), 6 (Landscape and Townscape), 7 (Historic Environment), 8 (Efficient Use of Land), 9 (Minerals) and 10 (Water). It is unlikely, however, that all negative effects against these SA objectives would be avoided and some uncertainty is likely to remain, particularly until such time as sustainable alternative water supplies are secured.

1.34 Not meeting objectively assessed needs is likely to result in this option performing less strongly than the other emerging option and the effects previously identified for Spatial Option 9 against SA objectives 1 (Housing), 14 (Economy) and 15 (Employment), limiting positive effects and having more negative impacts. The significance of these effects will depend on the scale of the shortfall identified and whether any of this shortfall can be accommodated by willing neighbouring local authorities. Not meeting demand adversely affects the affordability of homes resulting in negative socio-economic effects against SA objectives 3 (Social Inclusion and Equalities) and 4 (Health).

1.35 The fewer new homes and jobs that are available in Greater Cambridge over the plan period, the less likely people will be able to live and work in Greater Cambridge. People are likely to have to travel greater distances to commute to and from workplaces and access local services and facilities, resulting in more negative effects against SA objectives 2 (Access to Services and Facilities), 12 (Climate Change Mitigation) and 13 (Air Pollution). These negative effects would be exacerbated if jobs continue to grow, given the strength of the economy and land supply, whilst new housing was limited.

1.36 If neighbouring authorities are willing and able to accommodate some or all Greater Cambridge's shortfall, particularly given some will experience water resource issues in their parts of the East of England, negative effects against SA Objectives 1 (Housing), 3 (Social Inclusion and Equalities) and 4 (Health), 14 (Economy) and 15 (Employment) would be reduced but not eliminated given housing affordability would likely still be an issue in Greater Cambridge. Similarly, ongoing in-commuting into Greater Cambridge would be increased, resulting in negative effects against SA objectives 2 (Access to Services and Facilities), 12 (Climate Change Mitigation) and 13 (Air Pollution). It is reasonable, however, to assume that contributing to a shortfall in accessible locations in neighbouring authorities is likely to have more limited negative effects against these objectives than not meeting the shortfall at all.

1.37 While this emerging option would provide for fewer homes than updated evidence indicates are needed, and potentially fewer jobs too (although as set out above there is less certainty whether jobs would be limited to the same extent), it is uncertain at this time whether the scale of provision would be less than the 'medium' or 'medium +' scale of growth previously appraised in the Greater Cambridge Local Plan: First Proposals SA Report. Growth at a scale similar to the 'medium' or 'medium +' scales previously tested would be likely to generate similar effects as the spatial options previously tested. However, if the scale of growth is lower, effects against SA objectives 5 (Biodiversity and Geodiversity), 6 (Landscape and Townscape), 7 (Historic Environment), 8 (Efficient Use of Land), 9 (Minerals) and 10 (Water) may be less negative than for previously tested spatial options. At the same time, effects against SA objectives 1 (Housing), 3 (Social Inclusion and Equalities), 4 (Health), 14

(Economy) and 15 (Employment) would be likely to be less positive and more negative.

Key Strategic Site Allocations

1.38 The Councils are not proposing a full development strategy at this point, and as such there are no alternatives identified in relation to this. However, under the safe assumption that some development beyond current commitments in the 2018 Local Plans will be deliverable within the confines of the water supply and housing delivery challenges outlined above, the following strategic sites have been considered as a priority for inclusion in any future spatial strategy as sustainable locations for development:

- North East Cambridge.
- Cambridge East (Airport).
- Cambridge Biomedical Campus (incorporating the existing Campus, and exploring whether an exceptional circumstances case can be made for the allocation of additional land to the south and its removal from the Green Belt).

1.39 Table 3 outlines the likely effects of the three relevant strategic site allocation policies recorded in the Greater Cambridge Local Plan: First Proposals SA Report (2021). It should be noted that Policy S/CBC Cambridge Biomedical Campus assessed below included both the existing Campus and the additional land to the south.

Table 3: Likely effects of three strategic site allocation policies recorded in the latest SA Report

SA objectives	Policy S/NEC: North East Cambridge	Policy S/CE: Cambridge East	Policy S/CBC: Cambridge Biomedical Campus
SA objective 1: Housing	++	++	+

SA objectives	Policy S/NEC: North East Cambridge	Policy S/CE: Cambridge East	Policy S/CBC: Cambridge Biomedical Campus
SA objective 2: Access to services and facilities	++	++	+/-?
SA objective 3: Social inclusion and equalities	+	+	0
SA objective 4: Health	++	++	++?
SA objective 5: Biodiversity and geodiversity	--?	+/-?	+/-?
SA objective 6: Landscape and townscape	++	0?	--?/+
SA objective 7: Historic environment	0	-?	-?
SA objective 8: Efficient use of land	++	+	--
SA objective 9: Minerals	++	--?	--?
SA objective 10: Water	-?	0	0
SA objective 11: Adaptation to climate change	+?	+/-	+
SA objective 12: Climate change mitigation	++/-	++/-	++/-
SA objective 13: Air pollution	++/-	++/-	++/-
SA objective 14: Economy	++?	++	++
SA objective 15: Employment	++	++	++

1.40 To date, no new evidence has come to light that would change the likely effects of the strategic site allocation policies recorded in the Greater Cambridge Local Plan: First Proposals SA Report. Further details on the reasons of the effects recorded in Table 3 can be found in Chapter 5 of the Greater Cambridge Local Plan: First Proposals SA Report.

1.41 Table 4 summarises the representations received in relation to the SA of the three strategic sites contained within the Greater Cambridge Local Plan: First Proposals SA Report.

Table 4: Representations received in relation to the SA of the three strategic sites

Site	Summary of Representations
North East Cambridge	Various respondents have noted that the inclusion of the North East Cambridge AAP is premature as it is predicated on the relocation of the Cambridge Waste Water Treatment Plant. As such, the SA should assess the effects of the proposed relocation.
Cambridge East (Airport)	No representations mention the Cambridge East site.
Cambridge Biomedical Campus	A respondent noted that the appraisal of the Cambridge Biomedical Campus includes policy interventions within the assessment and therefore the site scores more favourably than other sites. This approach has not been undertaken for all sites therefore the assessments are inconsistent.

1.42 With regards to the representations on the preferred North East Cambridge site allocation, the North East Cambridge Area Action Plan (NECAAP) is predicated on the relocation of the Waste Water Treatment Plant (WWTP) having taken place. Waste provision is the responsibility of the County Council as Minerals and Waste Authority, however, the WWTP relocation project is being taken forward, led by Anglian Water, under the Development Control Order (DCO) process, which is subject to its own environmental assessment process. The WWTP relocation project process is therefore a separate process to the NECAAP being prepared by the City Council and South Cambridgeshire District Council as the local planning authorities. The DCO application is expected to be submitted to the planning inspectorate in early 2023. The outcome of the independent DCO process will inform the SAs of the in-

combination effects of the Local Plan and NECAAP with other plans and projects in the next iteration of the SA Reports when available.

1.43 With regards to the representation referencing the appraisal of Policy S/CBC: Cambridge Biomedical Campus, all site options were appraised consistently using the assumptions set out in Appendix D of the Greater Cambridge Local Plan: First Proposals SA Report prior to the appraisal of site allocation policy options. Further detail on how sites were identified and tested can be found at paragraph 2.20 and Appendix E of the same SA Report.

Next steps for the SA

1.44 Once Cambridge Water's Water Resource Management Plan is published and the Councils have drafted updates to other related evidence and considered the representations made to the First Proposals Plan, the Councils will determine what alternative approach(es) are reasonable and deliverable and carry out SA of these to inform the preparation of the Greater Cambridge Draft Local Plan.

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Report produced by LUC

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