



**Draft Cambridge Biomedical Campus Supplementary
Planning Document**

Habitats Regulation Assessment Screening Report

November 2024

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1. Introduction

- 1.1 The Greater Cambridge Shared Planning Service has drafted the Cambridge Biomedical Campus Supplementary Planning Document (SPD), in order to provide technical guidance to assist with the implementation of policies related to the Cambridge Biomedical Campus contained within the 2018 Cambridge and South Cambridgeshire Local Plans. The draft SPD was made available for public consultation between 28 November 2024 and 24 January 2025.
- 1.2 The SPD provides technical guidance for developers on the information that needs to be submitted with planning applications to demonstrate compliance with adopted planning policies related to the Cambridge Biomedical Campus.
- 1.3 It supports the implementation of the following policies:

Cambridge Local Plan (2018):

Section Two: The Spatial Strategy

- Policy 1: The Presumption in Favour of Sustainable Development;
- Policy 2: Spatial Strategy for the Location of Employment Development;
- Policy 3: Spatial Strategy for the Location of Residential Development;
- Policy 4: The Cambridge Green Belt;
- Policy 5: Sustainable Transport and Infrastructure;
- Policy 6: Hierarchy of Centres and Retail Capacity;
- Policy 8: Setting of the City.

Section Three: City Centre, Areas of Major Change, Opportunity Areas and Site-Specific Proposals

- Policy 10: The City Centre;
- Policy 14: Areas of Major Change and Opportunity Area – General Principles.

Section Four: Responding to Climate Change and Managing Resources

- Policy 28: Carbon Reduction, Community Energy Networks, Sustainable Design and Construction, and Water Use;
- Policy 29: Renewable and Low Carbon Energy Generation;
- Policy 31: Integrated Water Management and the Water Cycle;
- Policy 34: Light Pollution Control;
- Policy 35: Protection of Human Health and Quality of Life from Noise and Vibration;

- Policy 36: Air Quality, Odour and Dust;
- Policy 37: Cambridge Airport Public Safety Zone and Air Safeguarding Zones.

Section Five: Supporting the Cambridge Economy

- Policy 40: Development and Expansion of Business Space;
- Policy 41: Protection of Business Space;
- Policy 42: Connecting New Developments to Digital Infrastructure;
- Policy 43: University Development.

Section Seven: Protecting and Enhancing the Character of Cambridge

- Policy 55: Responding to Context;
- Policy 56: Creating Successful Places;
- Policy 57: Designing New Buildings;
- Policy 58: Altering and Extending Existing Buildings;
- Policy 59: Designing Landscape and the Public Realm;
- Policy 60: Tall Buildings and the Skyline in Cambridge;
- Policy 61: Conservation and Enhancement of Cambridge's Historic Environment;
- Policy 62: Local Heritage Assets;
- Policy 68: Open Space and Recreation Provision through New Development;
- Policy 69: Protection of Sites of Biodiversity and Geodiversity Importance;
- Policy 70: Protection of Priority Species and Habitats.

Section Eight: Services and Local Facilities

- Policy 73: Community, Sports and Leisure Facilities;
- Policy 75: Healthcare Facilities;
- Policy 77: Development and Expansion of Visitor Accommodation.

Section Nine: Providing the Infrastructure to Support Development

- Policy 80: Supporting Sustainable Access to Development;
- Policy 81: Mitigating the Transport Impact of Development;
- Policy 82: Parking Management;
- Policy 85: Infrastructure Delivery, Planning Obligation and the Community Infrastructure Levy.

South Cambridgeshire Local Plan (2018):

Chapter 2: Spatial Strategy

- Policy S/3: Presumption in Favour of Sustainable Development;
- Policy S/4 Cambridge Green Belt.

Chapter 4: Climate Change

- Policy CC/1: Mitigation and Adaption to Climate Change;
- Policy CC/3 Renewable and Low Carbon Energy in New Development;
- Policy CC/4: Water Efficiency;
- Policy CC/6 Construction Methods;
- Policy CC/7: Water Quality.

Chapter 5: Delivering High Quality Places

- Policy HQ/1: Design Principles;
- Policy HQ/2: Public Art and New Development.

Chapter 6: Protecting and Enhancing the Natural and Historic Environment

- Policy NH/4: Biodiversity;
- Policy NH/6: Green Infrastructure.

Chapter 8: Building a Strong and Competitive Economy

- Policy E/2: Cambridge Biomedical Campus Extension;
- Policy E/9: Promotion of Clusters;
- Policy E/10: Shared Social Spaces in Employment Areas.

Chapter 9: Promoting Successful Communities

- Policy SC/4: Meeting Community Needs;
- Policy SC/6 Indoor Community Facilities;
- Policy SC/9: Lighting Proposals;
- Policy SC/10: Noise Pollution;
- Policy SC/12 Air Quality.

Chapter 10: Promoting and Delivering Sustainable Transport and Infrastructure

- Policy TI/2: Planning for Sustainable Travel;
- Policy TI/3: Parking Provisions;
- Policy TI/6: Cambridge Airport Public Safety Zone;
- Policy TI/8: Infrastructure and New Developments;
- Policy TI/10: Broadband

1.4 Habitats Regulations Assessment is an assessment of the potential effects of proposed plan or project, both alone and in combination with other plans and projects, on one or more Natura 2000 or Ramsar sites. This report summarises stage 1 of this process providing a summary of the [Habitats Regulations Assessment Screening Report](#) carried out for the Cambridge Local Plan 2018 and [Habitats Regulations Assessment Screening Report](#) for the South Cambridgeshire Local Plan 2018, for which the Planning Obligations SPD provides further guidance.

1.5 The conclusion drawn as a result of this screening assessment is that the Cambridge Biomedical Campus SPD is not likely to have any significant effects on the Natura 2000 or Ramsar sites identified. The Councils therefore consider that it is not necessary to proceed to further stages of appropriate assessment.

2. Habitats Regulation Assessment

The Habitats Directive

- 2.1 Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora (the 'Habitats Directive') provides the legal protection for habitats and species of European Importance. Article 6(3) establishes the requirement for Habitats Regulations Assessment and states:

“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”

Article 6(4) goes on to discuss alternative solutions, the test of ‘imperative reasons of overriding public interest’ (IROPI) and compensatory measures:

“If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, the Member State shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.

Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission to other imperative reasons of overriding public interest.”

- 2.2 The sites covered by Habitats Regulations Assessment form what are known as Natura 2000 sites. These are a European network of special areas of conservation (SACs) and special protection areas (SPAs) under the old Wild Birds Directive (79/409/EEC) and the new Wild Birds Directive (2009/147/EC), provided for by Article 3(1) of the Habitats Directive.

These sites of international importance for nature conservation were established under the Habitats Directive, which was transposed into UK law as the [Conservation \(Natural Habitats, &C\) Regulations 1994](#). On 1 April 2010 this was replaced by [The Conservation of Habitats and Species Regulations 2010](#), which was consequently amended by [The Conservation of Habitats and Species \(Amendment\) Regulations 2011 and 2012](#).

2.3 Also of relevance to Habitats Regulations Assessment is paragraph 176 of the National Planning Policy Framework (February 2019), which states that:

“the following should be given the same protection as habitats sites:

- Potential Special Protection Areas and possible Special Areas of Conservation;
- Listed or proposed Ramsar sites; and
- Sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.”

Therefore, these sites have also been assessed as part of the Screening Reports for the Cambridge Local Plan 2018 and the South Cambridgeshire Local Plan 2018, which are summarised in this report.

What is Habitats Regulations Assessment?

2.4 Habitats Regulations Assessment is an assessment of the potential effects of a proposed plan in combination with other plans and projects on one or more European sites, Natura 2000 sites and Ramsar sites. The Habitats Directive promotes a hierarchy of avoidance, mitigation and compensatory measures. First, the plans should aim to **avoid** any negative impacts on European sites by identifying potential impacts early on in the plan-making process and writing these impacts out of the plan. Where adverse impacts remain, **mitigation measures** should be applied to the point that no adverse impacts remain. If the plan is still likely to result in adverse impacts that cannot be mitigated it should not be taken forward in its current form. In this situation, the plans may have to undergo an assessment of alternative solutions.

Where adverse impacts remain, **compensatory measures** may be required, but these will only be permitted if (a) no alternative solutions exist and (b) the plan is required for imperative reasons of overriding public interest (the ‘IROPI’ test).

2.5 There are 4 stages to the Habitats Regulations Assessment process as outlined below:

- **Stage 1 (Screening)** – the process which identifies the likely impacts upon a Natura 2000 or Ramsar site(s), either alone or in combination with other projects or plans and considers whether these impacts are likely to be significant;
- **Stage 2 (Appropriate Assessment)** – the consideration of the impact on the integrity of the site(s), either alone or in combination with other projects or plans, with respect to the site's structure and function and its conservation objectives.

Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts should be provided.

- **Stage 3 (Assessment of alternative solutions)** – the process which examines alternative ways of achieving the objectives or the project or plan that avoid adverse impacts on the integrity of the Natura 2000 and Ramsar site(s); and
- **Stage 4 (Compensatory measures)** – an assessment of the compensatory measures where, in light of an assessment of imperative reasons of overriding public interest, it is deemed that the plan should proceed.

2.6 If the screening stage concludes that are likely to be no significant impacts on European sites, then there is no need to progress onto the stage of Appropriate Assessment.

2.7 Judgement of the significance of effects should be undertaken in relation to the designated interest features and conservation objectives of the site in question, using sound judgement and with a clear scientific basis where available. Where insufficient information is available to make a clear judgement, it should be assumed that a significant effect is possible in line with the precautionary principle:

The Precautionary Principle - Prudent action that avoids the possibility of irreversible environmental damage in situations where the scientific evidence is inconclusive, but the potential damage could be significant

Structure of this report

2.8 The structure of this report is as follows:

- Section 3 - Description of the Cambridge Biomedical Campus SPD and relationship to the Cambridge Local Plan 2018 and the South Cambridgeshire Local Plan 2018;
- Section 4 - Description of the Habitats Regulations Assessment Screening Report for the Cambridge Local Plan 2018 and the South Cambridgeshire Local Plan 2018 and relevance to the Cambridge Biomedical Campus SPD, including:
 - Description of the relevant plans and projects considered ‘in combination’;
 - Screening Methodology;
 - Natura 2000 and Ramsar Sites considered as part of the Screening Assessment;
 - Conclusions of the Screening Assessment and relevance to the Cambridge Biomedical Campus SPD.
- Section 5 – Consultations.

3. Planning Obligations SPD and relationship to the Cambridge Local Plan 2018 and the South Cambridgeshire Local Plan 2018

- 3.1 The Cambridge Biomedical Campus SPD supplements policies within the adopted development plans. The draft SPD provides technical guidance for developers on the principles that should be considered when preparing and submitting planning applications to guide future development proposals at the Cambridge Biomedical Campus and provides a planning framework for consideration when determining planning applications.
- 3.2 The Cambridge Local Plan, adopted in 2018, sets out the aims of future development. The Vision for Cambridge is to build on the city's reputation for design excellence, promoting innovative and sustainable development. The Local Plan promotes the continued vision to further expand the knowledge-based economy with world leading research and education, whilst facilitating growth and infrastructure to support development.
- 3.3 The Local Plan contains a range of policies that are relevant to the SPD and should be considered when determining planning applications for Cambridge Biomedical Campus. Policy 17: Cambridge Biomedical Campus (including Addenbrooke's Hospital) Area of Major Change sets out specific policy requirements for the Cambridge Biomedical Campus site. Additionally, the Local Plan sets out support for the continuing development of the Cambridge Biomedical Campus as a high quality, legible, and sustainable campus and its expansion to meet the health needs of the expanding city.
- 3.4 The South Cambridgeshire Local Plan, adopted in September 2018, identifies Cambridge Biomedical Campus as an international center of excellence for patient care, biomedical research and healthcare education. Contained within the Local Plan, Policy E/2: Cambridge Biomedical Campus Extension establishes that the extension to the Biomedical Campus will be supported for biomedical and biotechnology research and development within class use B1(b) and related higher education and sui-generis medical research institutes, subject to satisfying a number of policy requirements.
- 3.5 The SPD will inform developers and infrastructure providers for the key principles to consider when bringing forward proposals within the Campus, to ensure that they are individually and cumulatively making a positive contribution to the longer-term vision of the Campus. The SPD ensures high quality development through a number of high-level principles, obligations and mitigation of potential impacts from new development with a checklist that developers can consider in the preparation of a planning application.

3.6 The Cambridge Biomedical Campus SPD has been developed with input from officers from across both South Cambridgeshire District Council and Cambridge City Council.

3.7 Both the 2018 Cambridge and South Cambridgeshire Local Plans were subject to a Habitats Regulations Assessment Screening Report during their preparation and can be accessed from the following links:

- [Cambridge City Council Habitats Regulations Assessment Screening Report Part 1](#)
- [Update February 2016](#);
- [Cambridge City Council Habitats Regulations Assessment Screening Report Part 2](#)
- [Update February 2016](#);
- [South Cambridgeshire Local Plan Submission Sustainability Appraisal Report and Habitats Regulations Screening Assessment \(March 2014\)](#).
- [South Cambridgeshire Sustainability Appraisal Addendum Report incorporating Habitats Regulations Assessment Screening Assessment \(2015, revised March 2016\)](#).

3.8 The focus of the draft SPD is to provide additional guidance on the implementation of policies in the adopted Local Plans. It does not set new policy requirements or allocate any land for development. In light of this, this report provides a summary of the Screening Reports of the Cambridge Local Plan 2018 and the South Cambridgeshire Local Plan 2018.

4. Description of the Habitats Regulations Assessment Screening Report for the Cambridge Local Plan 2018 and the South Cambridgeshire Local Plan 2018 and relevance to the Cambridge Biomedical Campus SPD

Description of relevant plans and strategies to be considered ‘in combination’

- 4.1 Section 3 and Appendix 1 of the Screening Report for the Cambridge Local Plan 2018 provided a description of the relevant plans and strategies to be considered ‘in combination’ with the Cambridge Local Plan. This included plans and strategies of other nearby authorities and minerals and waste plans produced by County Councils. It should be noted that all relevant plans considered will be subject to the requirements of the Habitats Directive, which will be carried out by the relevant authority producing that plan or strategy. The identification of these other plans and strategies allowed for the consideration of in combination effects as part of the screening assessment of the Cambridge Local Plan.
- 4.2 South Cambridgeshire’s draft final Sustainability Appraisal and HRA Screening Update include a similar description of relevant plans and strategies to be considered ‘in combination’ at appendix 11 of that document.

Screening methodology

- 4.3 The Screening Assessments of the Cambridge Local Plan 2018 and the South Cambridgeshire Local Plan were undertaken in accordance with the European Commission’s guidance on the ‘Assessment of Plans and Projects significantly affecting Natura 2000 sites’. The tasks undertaken as part of this process are outlined below.
- 4.4 **Task 1: Identification of Natura 2000 and Ramsar sites and the factors contributing to and defining the integrity of those sites** – The assessments for Cambridge and South Cambridgeshire identify the same Natura 2000 and Ramsar sites. Full details of each site considered and the attributes that contribute to and define the integrity of these sites is included in Appendix 2 of the Screening Report for the Cambridge Local Plan and Appendix 13 of the Scoping Report for the South Cambridgeshire Local Plan. The main aim of the screening assessment process is to ensure that the plan in question, either alone or in combination with other plans will not have an impact on the conservation objectives of these sites.

- 4.5 **Task 2: Completion of the Habitats Regulations Assessment Screening Matrix for the Cambridge Local Plan and the South Cambridgeshire Local Plan, including an Assessment of Significance of Effects** – A screening matrix was used to assess the Cambridge Local Plan, a methodology that had been used to assess previous plans and supplementary planning documents produced by Cambridge City Council in consultation with Natural England. As part of this assessment, the precautionary principle was applied to the assessment of whether or not the potential effects of the document could be considered to be ‘significant’. A screening matrix was used to assess each of the European sites identified and considered both the potential effects of the Cambridge and South Cambridgeshire Local Plans both on their own and in combination with the other relevant plans and projects identified in the Screening Reports. The impacts considered by the screening matrix included:
- Consideration of land take by development;
 - Impact on protected species which travel outside the designated sites;
 - Increased disturbance from recreational use;
 - Impacts on water quantity and quality; and
 - Changes in levels of pollution.

Natura 2000 and Ramsar Sites considered as part of the Screening Assessment

- 4.6 An initial investigation was undertaken to identify Natura 2000 and Ramsar sites within and outside the plans’ area with potential to be affected by the Cambridge and South Cambridgeshire Local Plans. This involved the use of GIS data as well as consultation with the Natural England Four Counties team. In line with the precautionary approach, some sites at relatively significant distances from the district boundary were included in the study.
- 4.7 There is one Natura 2000 site within South Cambridgeshire District, which has been considered as part of this assessment:
- Eversden and Wimpole Woods SAC.
- 4.8 There are a number of other sites within the surrounding districts, which have also been considered as part of this Assessment, because of their proximity to South Cambridgeshire and / or the nature of their conservation interest:
- Ouse Washes SAC and SPA
 - Fenland SAC
 - Portholme SAC
 - Devil’s Dyke SAC

4.9 Two Ramsar sites are to be considered:

- Ouse Washes

Fenland (Woodwalton Fen, Chippenham Fen, Wicken Fen)

4.10 Natural England confirmed that this list was comprehensive for the purposes of Habitats Regulations Assessment (by letter 9.11.06). Breckland SAC has been now added to this list in order to ensure that a thorough assessment can be made of all the designated sites that may be impacted by proposals in the future. Other local planning authorities within Cambridgeshire have included the Breckland area into their HRA work and it was therefore considered as a precautionary principle to do likewise.

4.11 Further details of each of these sites along with their relevant conservation objectives are contained within Appendix 2 of the Screening Report for the Cambridge Local Plan, while maps of the sites are included within Appendix 3. Details of the European Sites being assessed, and their relevant conservation objectives, are provided in Appendix 11 of the South Cambridgeshire Draft Final Sustainability Appraisal.

Conclusions of the Screening Assessment and relevance to the Cambridge Biomedical Campus SPD

4.12 Appendix 4 of the Screening Report for the Cambridge Local Plan contains the full assessment of the potential impacts of the plan both alone, and in combination with other relevant plans. The overall conclusions of this screening assessment were that that the Cambridge Local Plan was unlikely to have any significant impacts on the conservation objectives of the Natura 2000 and Ramsar sites identified. As such it was considered that it was not necessary to proceed to Stage 2 of the Habitats Regulations Assessment process, i.e. the requirement for an Appropriate Assessment.

4.13 Annex C of the Screening Report for the South Cambridgeshire Local Plan contains the full assessment of the potential impacts of the plan both alone and in combination with other relevant plans. The overall conclusions of this screening assessment were that the South Cambridgeshire Local Plan was unlikely to have any significant impacts on the identified European sites as a consequence of the policies and allocations in the plan.

- 4.14 Further details of each of these sites along with their relevant conservation objectives are contained within Appendix 2 of the Screening Report for the Cambridge Local Plan, while maps of the sites are included within Appendix 3. Details of the European Sites being assessed, and their relevant conservation objectives, are provided in Appendix 11 of the South Cambridgeshire Draft Final Sustainability Appraisal.

Conclusions of the Screening Assessment and relevance to the Cambridge Biomedical Campus SPD

- 4.15 Appendix 4 of the Screening Report for the Cambridge Local Plan contains the full assessment of the potential impacts of the plan both alone, and in combination with other relevant plans. The overall conclusions of this screening assessment were that the Cambridge Local Plan was unlikely to have any significant impacts on the conservation objectives of the Natura 2000 and Ramsar sites identified. As such it was considered that it was not necessary to proceed to Stage 2 of the Habitats Regulations Assessment process, i.e. the requirement for an Appropriate Assessment.
- 4.16 Annex C of the Screening Report for the South Cambridgeshire Local Plan contains the full assessment of the potential impacts of the plan both alone and in combination with other relevant plans. The overall conclusions of this screening assessment were that the South Cambridgeshire Local Plan was unlikely to have any significant impacts on the identified European sites as a consequence of the policies and allocations in the plan.
- 4.17 The policies for which the Cambridge Biomedical Campus SPD provides guidance, were assessed as part of the Habitats Regulations Assessment Screening undertaken of the Cambridge and South Cambridgeshire Local Plans. As the SPD does not make any changes to these policies, or allocate any land for development, it is unlikely that it will have any significant impacts on the conservation objectives of the Natura 2000 and Ramsar sites identified. The reasons for this conclusion, set against the impacts considered by the screening matrix are as follows:
- **Land take by development** - The Cambridge Biomedical Campus SPD does not propose any development that would take land from any of the Natura 2000 and Ramsar sites identified.
 - **Impact on protected species outside the protected sites** - The Cambridge Biomedical Campus SPD sets out principles on open spaces and landscape through provision of high-quality multi-purpose spaces. The

principles address the need to provide for biodiversity and improve ecology on the campus through habitat retention, creation and enhancement. As such, it is considered that the Cambridge Biomedical Campus SPD will not have any significant adverse impacts on protected species outside of the protected sites and may have some positive effects.

- **Recreational pressure and disturbance** - The Cambridge Biomedical Campus SPD does not allocate land for development, the SPD provides further detail on policies contained within the local plan and as such the guidance that it contains will not result in an increase in recreational pressure and disturbance. As such, it is unlikely that the SPD will have significant impacts on recreational pressure and disturbance of the Natura 2000 and Ramsar sites.
- **Water quantity and quality** - The issue of water quality and quantity is of importance to a number of the Natura 2000 and Ramsar sites identified in the Habitats Regulations Assessment, notably Wicken Fen, Chippen Fen, Woodwalthon Fen and the Ouse Washes and Portholme. The Cambridge Biomedical Campus SPD provides high level guidance for developers to consider on managing flood risk and the water environment as part of new development proposals alongside principles for sustainability such as integrating principles of sustainable design and construction in all aspects of design including water demand, with applicants being encouraged to commit to post occupancy evaluation studies with measurable data on the building's performance including energy and water efficiency standards. Additionally, the Cambridge Biomedical Campus SPD contains guidance for non-clinical uses such as to seek efficiency targets by including non-potable water supply, harvested rainwater or re-used greywater and including urban drainage systems (SuDS). As such, it is unlikely that the SPD will have significant impacts on water quantity and quality of the Natura 2000 and Ramsar sites.
- **Changes in pollution levels** - The Cambridge Biomedical Campus SPD sets out principles for developers to consider impacts on air quality, noise and vibration, and contaminated land through the uses on the campus and through construction phases of development. Requirements for the promotion of sustainable transport and dedicated cycling and pedestrian routes to reduce car dependency improve air quality, alongside ensuring lighting of buildings and open spaces avoids adverse impact on the rural edge and Hobson's Brook, are also included within the SPD. As such, it is unlikely that the draft SPD will have significant impacts on pollution levels at Natura 2000 and Ramsar Sites.

- 4.18 There are considered to be no changes to the in-combination effects identified within the Screening Assessment of the Cambridge Local Plan 2018 and the South Cambridgeshire Local Plan 2018.
- 4.19 The overall conclusions of this screening assessment are that the Cambridge Biomedical Campus SPD is unlikely to have any significant impacts on the conservation objectives of Natura 2000 and Ramsar sites identified. As such, it is considered that it is not necessary to proceed to the next stage of the Habitats Regulations Assessment process, i.e. Stage 2 and the requirement for an Appropriate Assessment.

5. Consultations

- 5.1 A public consultation on the draft Planning Obligations SPD will be held between 28 November 2024 and 24 January 2025. As part of the consultation, Natural England the statutory nature conservation body for appropriate assessment will be consulted on this Screening Assessment at the same time as the consultation on the draft SPD.