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Planning and New Communities

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Our Ref: PRE/0300/11

Date 15 September 2011

Ms L Tinker
Terence O'Rourke Ltd
Everdene House
Deansleigh Road
Bournemouth
BH7 7DU

Dear Ms Tinker

RE: Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011: Proposed Phase 1 of the Northstowe development including infrastructure, land adjacent Hattons Road and land to the west of Longstanton in the parishes of to Longstanton and Oakington.

Further to your report and letters of 15th and 19th July, this letter and appendices form the Council's Scoping Opinion in respect of the proposed development. It is made in accordance with the revised regulations i.e. under Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011.

This first phase of development is proposed in order to bring forward the wider development of Northstowe, and will be considered in that context, as you identify in Section 17 of your report.

Generally the document is considered in terms of its headings, the issues and areas of information to provide a sound basis upon which to consider the potential environmental impacts of the development. Appendix 1 highlights the areas where further work is required as you prepare the Environmental Statement over the coming months.

Appendix 2 details the people and organisations that were consulted as part of the scoping process. In Edward Durrant's letters of 18th and 24th August you were provided with a number of responses. The final responses, which are enclosed for your information, are listed at the bottom of this letter.

In accordance with the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, a copy of this scoping opinion will be placed on Part 1 of the Planning Register. It should be noted that this opinion does not preclude the Council from requesting further information at a later stage by way of a Regulation 22 should it need to do so.

If you require any further information or assistance then please do not hesitate to contact me.

Yours sincerely



Jane Green
Head of New Communities – Planning and New Communities

Appendix 1: summary of further issues to be addressed

Appendix 2: List of consultees

Attached scoping responses from -

Archaeology (CCC) – 24/08/11

RSPB – 24/08/11

NHSC – 25/08/11

Natural England – 25/08/11

Cambridgeshire County Council - 02/09/11

Highways Agency - 14/09/11

Appendix 1: EIA Scoping Opinion Response – Northstowe Phase 1

Introduction:

Thank you for your scoping report of July 2011, which relates to the following development, comprising:

- Approximately 1500 dwellings at an average density of 40 dwellings per hectare, approximately 35% of which will be affordable housing
- At least one small mixed use local centre, including shops, dwellings and community facilities
- School
- Approximately 3.5ha of employment land
- A household recycling centre and foul pumping station
- Approximately 35ha of formal and informal public open space, including a sports hub

From the responses that have been received your initial scoping report is considered to have identified most of the potential impacts of the proposed development. Below is a list of what the Council considers to be the issues for you to consider in the preparation of your Environmental Statement (ES). You should also refer to the responses that are contained in Appendix 3, and attached to Edward Durrant's letters of 18th and 24th August 2011, which may contain more detail about each relevant aspect.

General point:

Your report makes reference to the 2007 outline application (S/7006/07/O) process. One of the problems that members of the public and officers had with the previous ES was the lack of cross-referencing and the duplication of information in other documents that were submitted. It is therefore requested that all of the documents submitted with the new application reference information contained within the ES, where appropriate, so as to avoid unnecessary duplication in the supporting documents.

Chapter 6 - Air quality

Para. 6.6

This paragraph acknowledges that the energy strategy for the site has not yet been determined, so the potential for emissions of NO² and PM¹⁰ from biomass boilers has been included within the scope of the ES on a precautionary principle. The delivery of the material to run such facilities should be included as part of the assessment.

Para. 6.9

Where possible, 2010 diffusion tube data or Bar Hill real-time data, which can be supplied by the Council, should be used for model validation and verification although if a baseline scenario for 2007 is provided, it would be accepted if it is accompanied by a 2010 / 2011 scenario and all necessary future scenario's.

Data capture for real-time Bar Hill NO_x in 2010 was poor and it will not be possible to validate against this. As mentioned within the paragraph, these points will need to be discussed and agreed prior to work being carried out.

Para. 6.13

In addition to the EPUK *Development Control: Planning for Air Quality (2010 Update)*, the assessment should also use and/or have regard to the information and procedures set out within LAQM TG(09).

Para. 6.14

Since the last scoping exercise in 2007, the Council has adopted a District Design Guide SPD. Chapter 10 of the SPD sets out our requirements for emissions and air quality

assessments. New to the Council is the requirement for a Low Emissions Strategy, which should encompass the whole development. "Travel Planning" needs to be defined i.e. will it encompass other modes of travel such as walking, cycling etc.

Unlike in 2007, the Joint Promoters will now be required to submit a Low Emissions Strategy, which should consider all aspects of transport-related emissions reductions for the development.

The Low Emissions Strategy Guidance was agreed by Defra and published in January 2010. The Guidance document can be downloaded at the following link:

http://www.lowemissionstrategies.org/downloads/LES_Good_Practice_Guide_2010.pdf

Details of the Councils' Low Emissions and air quality expectations can be viewed in Chapter 10 and Appendix 4 of the District Design Guide SPD at the following link:

<http://www.scams.gov.uk/environment/planning/districtplanning/localdevelopmentframework/spds/districtdesignguidespd.htm>

Whilst the two mitigation measures mentioned in the Paragraph are submitted as "likely", there are many other measures that can possibly be introduced and the Low Emissions Strategy must consider and incorporate them where possible and appropriate.

Chapter 7 - Community, economic and social effects

An evaluation of the impact of the development design, and use of green infrastructure, on health and well being of future residents needs to be considered in this chapter. This chapter should also cover the potential impacts on existing rights of way, and how any losses can be mitigated by facilities within the new development.

Para. 3.1

This paragraph includes proposals for a 'school', however, it would be helpful to include a clearer definition of what is being proposed e.g. site and provision for 2FE primary school.

The potential for new residents to feel excluded or not part of a community in early days exists and should not be excluded from the assessment. Reference to the Joint Strategic Needs Assessment (JSNA) on New Communities is advised and further information can be found at the below link:-

<http://www.cambridgeshirejsna.org.uk/>

A community centre with office space is expected as part of this first phase development, which should form part of the likely mitigation measures. Likewise, it is expected that health provision be delivered locally and that services be planned for the first residents – which should be reflected in the temporal considerations of the EIA. A definition of local services would also be helpful to set out what is being considered.

We would like to discuss further with you the effects on demand for local businesses and whether this could be 'clearly significant' rather than 'likely significant', given the amount of new residents in this first phase of development.

It is recommended that the Health Impact Assessment (HIA) be integrated with the ES to provide a more holistic approach, rather than being submitted as a separate document. Moreover special attention should be given to social infrastructure and the importance of the social environment in contributing to good health needs to be highlighted. The scoping report should acknowledge that the ES and HIA both inextricably linked and that the ES will assist with and provide useful information for any HIA that needs to be undertaken.

Lifestyle issues need to be included in the scoping study and clearly identified mitigation measures needed if there is a gap between the completion of the first phase and the rest of Northstowe. Careful consideration of what indicators are used to make baseline indicators is needed.

The potential noise effects from the household recycling centre do need to be assessed. Such centres have the potential to cause substantial noise impact to existing and proposed residential premises in terms of traffic movements, delivery and collections, impact noises, plant noise and overall hours of use.

Chapter 8 - Cultural heritage

The geographical range of impacts needs reconsideration as it appears to have been too narrowly drawn. Moreover, features such as Giant's Hill Rampton (Scheduled Monument Number 20452), which is within 2km of the site, have not been identified.

There is no mention of which assets and effects have been considered before the likely significant environmental effects were defined and no identification of undesignated heritage assets, including those in the Historic Environment Record.

It is suggested that an analysis of historic character and structures in the landscape be carried out and that a further justification of the rationale for the evaluation of effects be provided.

There needs to be consideration of the importance of landscape features and their relationship with cultural heritage as well as the social impact of loss of rural environment and historic rights of way.

Given the importance of public art in helping to define new communities it is suggested that public art be embedded in the rationale of the development from the onset. The use of public art as a form of mitigation should therefore be incorporated into the Cultural Heritage section.

The site is located in a landscape of high archaeological potential and that the impact of the development on the historic environment should be considered as part of the ES. This assessment should include reference to relevant fieldwork undertaken to inform the previous Northstowe planning applications, and other fieldwork of relevance, such as the archaeological evaluation undertaken in advance of the construction of the golf course (Historic Environment Record Number ECB1089) and the assessment of parts of the site by English Heritage (EH). EH are currently considering an application to schedule part of the Longstanton All Saints Conservation Area. Additional fieldwork may be appropriate where new areas of land take are proposed which were not included in the previous applications. This information should be used to inform appropriate mitigation, which may include excavation, recording and publication of results, or preservation in situ where this is merited by the significance of the archaeology, or considered desirable in the context of the development.

You should consider proposals for public presentation and engagement as part of the application, to ensure that the results of fieldwork are appropriately disseminated and to contribute to the character and distinctiveness of the emerging new community.

Currently known baseline

Para. 8.2

Some trenching was undertaken on the golf course, which has been examined in conjunction with the results of previous programmes of work in this area and the results of the extensive geophysical survey.

Para. 8.3

There are no records of an extant track on the eastern perimeter of the airfield.

Assessment Methodology - the methodology proposed in this section is supported.

It is recommended that an historic environment management plan be produced to support the mitigation of the impact of this development. This would include details of sites/areas to be subject to excavation in advance of development (including infrastructure), details of measures to protect any areas identified for preservation in situ and measures to protect significant structures relating to the military use of the site. It would not be appropriate to propose archaeological watching briefs during the course of construction as mitigation in relation to this project. County Archaeology Officers have already discussed these issues with Gallagher Estates and their archaeological advisor.

Chapter 9 - Geology, hydrogeology and contamination

More information on the scale of the earthwork and cut and fill activities and reprofiling is required to understand whether the excavated material is fit for purpose.

Demonstrable consideration should be given to the geology of the potential excavation areas and whether digging of the areas would involve the removal of sand and gravel and potential pumping which could have an impact on dewatering in the wider area.

All of the appropriate issues in relation to contaminated land will be covered appear to be covered by this chapter.

Chapter 10 - Landscape and visual effects

There are a few significant trees within the site that must be retained and their management considered. In addition to these the benefits of incorporating character areas of trees into the built up areas green seams needs to be considered. The retention of existing trees, and the planting of new trees, needs special consideration at the design stage of road infrastructure. The environmental benefits of incorporating trees within the street design, and the management of these trees needs to be considered.

The potential for land contaminated by any munitions needs to be considered in a Remediation Strategy and the Earthworks Strategy. The removal of ordnance, if present, has the potential to have a significant impact of the visual character of parts of the site for a number of years. The ES should therefore consider how the impact of this process could best be mitigated.

Lighting impact can be wide and there can be significant adverse effects on ecology and possible statutory nuisance or detriment to the amenity of residential premises both during the construction and operational phases. The effects / impacts of construction and operational artificial lighting on existing and proposed sensitive residential premises should be considered within the ES.

The 2007 ES had a separate chapter 6 on Lighting, which was robust and comprehensive with adequate mitigation measures. It is likely that this assessment in the main remains valid subject to some validation of baseline lighting levels. It is recommended that the potential impact associated with any artificial lighting should be considered as a separate topic or at the very least the ES should make it clear in the contents that artificial lighting impact has been assessed to include the impact on existing and proposed residential premises.

Chapter 11 - Land use and agriculture

The contents of this chapter are considered acceptable.

Chapter 12 - Natural heritage

The 2km boundary for assessing impacts on internationally or nationally designated sites is a matter that may require further discussion. Sufficient green space should be integrated into the development to minimise the impact on designated sites and local wildlife sites.

In addition to this the recreational impacts from the proposed development on designated sites and nature reserves should be assessed in the natural Heritage chapter.

The impact of increased surface water run-off and on the quality of water resources should be assessed, particularly with regard to designated sites.

An assessment of the impact on farmland birds should be made, with a possible mitigation measure of offsite compensatory habitat being provided. The impacts on protected species should be assessed for both the construction and operational phases, with particular reference to the rare white spotted pinion moth, which is associated with elm trees and is known to be in Longstanton, and an assessment of the impact upon the common toad and mitigation measures are also needed.

Desk study and field survey of biodiversity information of the site needed, utilising records of relevant local groups as well as up to date botanical and terrestrial invertebrate surveys. A balance sheet approach to losses and gains of habitats should be adopted.

Your attention is also drawn to the Green Infrastructure Strategy that has just been published, which designates Northstowe as a target area. This document can be accessed by way of the link below.

http://www.cambridgeshirehorizons.co.uk/our_challenge/GIS.aspx

Chapter 13 - Noise and vibration

Noise from existing noise sources such as the Cambridge Guided Bus on the proposed dwellings will require noise and vibration assessment in any case and it would be sensible to include under one chapter.

The same noise impacts / effects at both the construction and operational stages of the development and affecting both existing and proposed noise sensitive development and in particular residential, as detailed in Chapter 9 (Noise and Vibration) of the scoping report for the 2007 ES remain applicable, as follows:

- Impacts of construction noise and vibration (including traffic) during the site preparation and construction phase affecting existing and proposed Noise-Sensitive Receptors
- Impacts during the operational phase on both existing and proposed Noise Sensitive Receptors
 - Traffic noise and vibration
 - Noise and vibration impact from existing employment and/or commercial development
 - Noise and vibration impact from proposed employment, commercial and mixed-use development on the site
 - Noise and vibration impact from proposed household waste recycling facility and sewage pumping station.
- Impacts associated with the specific road improvement works during construction and operation

The final remit should be agreed with the Council.

It is agreed that it is not necessary to assess the potential impact of all industrial and/or commercial activities (i.e. noise and vibration from the proposed employment areas) and any recreational uses / open spaces on proposed sensitive premises and in particular any outdoor Multi Use Games Areas (MUGA) with perimeter fencing or similar and or skateboard facilities as the precise details that are needed for such detailed assessments (i.e. the nature of the activities and the detailed plot layout and position of buildings) are not known at this early stage. However, the ES should specify noise design criteria noise emission limits and vibration standards that must be achieved to minimise any potential impact from industrial and/or commercial activities including mitigation measures.

Assessment Methodology

Para. 13.7

An updated validation of the 2003 baseline noise measurements is acceptable providing the remit is agreed with SCDC's Health & Environmental Services. Particular regard should be given to the B1050 Longstanton western bypass, which was completed in 2008.

Para. 13.8

The assessment of construction noise and vibration in accordance with the methodology in BS 5228: 2009 - Code of practice for noise and vibration control on construction and open sites -Noise and separately BS 5228 Vibration is acceptable.

The operational and post construction impacts assessment methodology, significance criteria to quantify effects / impacts in accordance with appropriate and relevant guidance / standards requires agreement. For example the following should be considered:

- Local Planning Policy: South Cambridgeshire District Council's (SCDC's)-"Local Development Framework, Development Control Policies, Development Plan Document", Adopted July 2007- Policy NE/15: Noise Pollution and SCDC's Supplementary Planning Document - "District Design Guide: High Quality and Sustainable Development in South Cambridgeshire", Adopted March 2010: Chapter 10- Environmental Health & Appendix 6: Noise":<http://www.scams.gov.uk/Environment/Planning/DistrictPlanning/LocalDevelopmentFramework/SPDs/DistrictDesignGuideSPD.htm>
- National Planning Policy: PPG 24- Planning and Noise
- Institute of Acoustics / Institute of Environmental Management and Assessment (2005) 'Guidelines on Noise Impact Assessment'
- The Design Manual for Roads and Bridges (DMRB) Volume 11, Environmental Assessment, Section 3, Environmental Assessment Techniques, Part 7, HD 213/11- Noise and Vibration Volume 11
- Calculation of Road Traffic Noise: 1988 (CRTN)
- DEFRA's "Noise Policy Statement for England", March 2010
- Environmental Noise (England) Regulations 2006
- BS 4142: 1997 'Method for rating industrial noise affecting mixed residential and industrial areas'
- BS 7445: 2003 Part 1 'Description and measurement of environmental noise'
- BS 8233: 1999 'Sound insulation and noise reduction for buildings – Code of practice'
- World Health Organisation (2000) 'Guidelines for Community Noise'
- World Health Organisation (2009) 'Night noise Guidelines for Europe'
- 'Environmental Noise and Health in the UK', A report by the Ad Hoc Expert Group on Noise and Health- Health Protection Agency 2010

Para. 13.10

The proposed construction environmental management plan is welcomed but the overall mitigation measures proposed are very limited.

A number of measures can be used to control the source of or limit exposure to construction and operational noise. Such measures should be proportionate and reasonable. Possible measures include:

- i. control at the source (measures to reduce noise emissions at source such as a quiet plant, noise insulation of buildings, plant enclosures or quiet road surfaces and or noise barriers/ earth bunds);
 - ii. control of the transmission path (adequate distance separation, building location, form and orientation, screening / noise barriers);
 - iii. control of noise at receiver (internal planning such as non habitable rooms providing a buffer, orientation of noise sensitive rooms and balconies and gardens way from noise by barrier dwelling blocks, single aspect courtyards schemes and staggered terraces, careful fenestration, noise insulation scheme for the building envelope of noise sensitive buildings and also buildings generating noise, reduced external amenity, acoustic ventilation)
 - iv. by controls over the operations that generate the noise (such as controls over the hours of operation, deliveries / collections, reduced traffic speeds).
- **Engineering** - reduction of noise at point of generation (e.g. by using quiet machines and/or quiet methods of working); containment of noise generated (e.g. by insulating buildings which house machinery and/or providing purpose built barriers around the site); and protection of surrounding noise-sensitive buildings (e.g. by improving sound insulation in these buildings with adequate ventilation and/or screening them by purpose-built barriers);
 - **Lay-out** - adequate distance between source and noise-sensitive buildings or areas; screening by natural barriers, other buildings, careful internal configuration of noise sensitive habitable rooms or non-critical rooms in a building;
 - **Administrative / Operational** - limiting operating time of source / construction activities / deliveries ; restricting activities allowed on the site and specifying an acceptable and reasonable noise limit.
 - **Work sequencing** - programming and phasing construction or extraction activities to limit noise impact; use of acoustic screens around plant; limiting vehicle noise through speed control, road surfacing and driving style;
 - **Baffle mounds** – particularly relevant to temporary construction where they can be constructed from the top soil, sub-soil and over-burden which need to be removed and stored;
 - **Acoustic fencing** - an alternative to baffle mounds or used on top of a mound to increase acoustic protection;
 - **Alternatives to vehicle reversing alarms** - include flashing lights during the night (but these may also cause a nuisance if not operated with care), radar-operated safety devices, audible “warble” devices, TV camera systems, and reduced level audible warnings for night time use;
 - **Off-site road traffic noise** – restriction of lorry movements to particular times or particular routes; low-noise road surfaces and road surface maintenance;
 - **Equipment selection** – setting noise limits for specific items of plant and equipment, e.g. those with certain tonal noise characteristics;

Acoustic double-glazing and secondary glazing for existing noise sensitive development - this is unlikely to be considered as appropriate long-term mitigation as a response to noise caused by a new development. The use of double-glazing and secondary glazing is not an alternative to other measures to control noise emissions or a means of legitimising higher noise limits.

Chapter 14 - Traffic and transport

The scoping report identifies that a Transport Assessment (TA) will be conducted and a scoping report will be agreed with the County Council. Therefore the ES will summarise the key findings of the TA focusing on the environmental issues and taking account of PPG 13

and IEMA Guidelines on Environmental Assessment of Road Traffic. It should also take into account the County Council's informal guidance on Transport Assessments.

A clear indication of the scale of construction aggregates need is required, as is an understanding of the amount of lorries coming in to and out of the site on a daily basis, at what access points, their routes to the primary road network and over what period of time – including if certain time restrictions are being assumed and temporary holding areas being considered during the construction phase.

There is significant concern amongst the surrounding communities about the impact of traffic in particular. The comments of the Parish Councils should be taken into consideration when considering means of mitigation. The traffic and transport effects will need to be informed by the associated transport assessment work and A14 transport work, which may affect their significance to that stated in the scoping report.

Mitigation measures will need further consideration and discussion. The scoping report does not mention bus revenue support for new (or extended) bus services, for example.

Public Rights of Way (PRoWs)

The inclusion of PRoW consideration in the transport section, both in terms of effect on the existing network and the need for enhancement to reflect increased population, is welcomed.

PRoWs do not always appear in the right places in the scoping report. PRoWs need to be considered as receptors for noise, air quality etc, remembering the build phase as well as final design. The assessment will also need to consider where PRoWs are adjacent to land - e.g. Wilsons Road bridleway by the southern excavation area. A concern will be how any new access roads will affect the PRoW network.

There are concerns that the alternative masterplan layouts may impact upon previous commitments to a perimeter bridleway and the retention of the Longstanton-to-Rampton byway (and other PRoW landscape features). Further comments will be provided once officers have had the opportunity to assess the proposed changes to the masterplan.

Chapter 15 - Waste

As part of this response, an update on the Cambridgeshire and Peterborough Minerals and Waste Plan is provided at the end of the County Council's report.

The inclusion of a Household Recycling Centre, and acknowledgement to complete the RECAP toolkit to examine the post-construction waste streams, are both welcomed. More information on the construction and demolition waste streams is essential at this early stage, particularly to inform the ES assessment as part of the construction phases.

As mentioned previously further information of the anticipated fill for the excavations will be required. If waste is likely to be placed into the holes the landform and afteruse should be considered as part of this assessment, and more information on how they will be backfilled, stabilised and restored all needs to be clarified and taken into account. There is potential for significant impacts and potential contamination of any major aquifers located within the vicinity of the proposed excavations and containment engineering may be necessary to enable waste disposal.

Paragraph 15.2 needs to be updated to state the mechanical biological treatment plant at Waterbeach is now operational and is no longer 'currently under development'. In addition it would be useful to make it clear it is South Cambridgeshire's 'municipal' waste that is largely managed at the Waterbeach Waste Management Park. As an aside a Materials Recovery Facility planning permission has been granted for the Waterbeach site, so once it is built the recyclables currently being sent away are likely to be dealt with onsite.

When looking at the key issues for waste within the ES scoping report it would appear that the recycling of former airfield runways / hardstandings and the idea of a temporary inert waste processing facility(s) during the construction phases has not been identified. In addition with the limited information for the cut and fill aspirations it is difficult to tell if any of the waste needs to be moved offsite. Such omissions could lead to implications not only in relation to the waste section of the ES report, but also to noise / vibration and potentially air quality and landscape implications that need to be considered. The relevant sections should take account of these potential omissions and the related summary tables updated to take account of these additional uses – which could in effect change the outcome of the associated tables. It should also be noted that the reuse of aggregates would significantly reduce the projects traffic impacts, particularly at the early stages of development (where lorry movements associated with concrete / aggregate for road construction could be reduced), albeit such recycling activities and storage would be best placed as far from residents as possible – it should be clear what assumptions have been made and what impacts assessed in these cases.

Due to the potential impacts associated with temporary inert waste recycling (crushing of concrete from former runways etc) the ES should include a section on Waste, which would update the information contained within Paragraph 18.2.

Chapter 16 - Water flooding and drainage

A clear understanding of what must be delivered prior to any phased development must be agreed with the Council, and the ES should identify the various phases of the development and what will be delivered when. The local use of groundwater in the area makes the site highly vulnerable to pollution, and the ES must include a scheme to deal with the risks associated with contamination. The ES should include a comprehensive preliminary risk assessment with associated conceptual site model.

Consideration of flood risk should extend to the impacts of treated effluent discharge through Uttons Drove Sewage Treatment Works (STW), as well as the capacity of the Swavesey Drain to accept flows, and the effect of discharge at times of high flows within the River Great Ouse. Provision for when Webbs Hole Sluice is ‘tide locked’ also needs to be adequately considered.

The hydraulic capacity of the Swavesey Drain system and the implications of the run-off of water from the site, are matters of concern for local communities due to the limited residual capacity in the receiving systems. Moreover, the impact of nearby receiving systems being used up by the flows from Uttons Drove STW, and the potential impact upon nearby villages, needs to be adequately considered.

The ES should include a description of any indirect or secondary effects of the development on the environment. From a water quality perspective the greatest impact is more likely to be manifest on the Swavesey Drain as a result of an increase discharge rate from Utton’s Drove STW.

The ES should reference the WCS and the findings should be incorporated into the development proposal. The status of the Over Railway Cutting CWS should be checked following the construction of the guided busway.

The ES should consider the impact on water features and licensed and unlicensed abstractions, as well as the provision of mains water to the proposed development.

Northstowe is intended to be an exemplar of sustainability and therefore measures such as SUDS ‘will be’ appropriate as mitigation rather than ‘may be’ appropriate. Within the hard landscaped areas serious consideration must be given to incorporate tree pit design as part of the storm water management of these areas.

Utton's Drove has been shown to have reached capacity due to the inability of the downstream watercourse to receive additional flows of treated effluent from the works. The ES should demonstrate that none of the receiving watercourses in the locality would be adversely affected by treated effluent (volume and quality) as a result of the proposed development. The means of conveyance of raw sewage from the development should be outlined and protection measures for pipework (from ingress of surface water) should be outlined to avoid a repetition of the flooding problems experienced on the Cambourne development.

The costs associated with the construction of the new balancing ponds in the southern area of excavation, involving the Council's award drains, will need to be assessed. These costs will need to be spread over the whole Northstowe site and it will not be possible to create the new ponds in a phased manner. The ES should therefore assess water flooding and drainage impact / mitigation for the entire envisaged development as a whole.

Chapter 17 - Cumulative effects

The approach to cumulative effects is accepted.

Cumulative impact should include any significant consented scheme together with any allocations for development or submitted applications of considerable scale. Whether significant cumulative effects are or are not likely to arise from a particular development will vary from topic to topic. For the purposes of the ES the following developments should be considered:

- Recent or other developments in Longstanton such as Home Farm
- North West Cambridge- University Site
- Orchard Park
- NIAB 1 and 2

It is unlikely that all disciplines will identify cumulative effects and indeed many of the environmental issues to be addressed will be site or study area specific only. Consideration of cumulative effects should be undertaken where significant cumulative effects are considered likely, for example where resulting from development within the wider Cambridge area, road networks and provision of facilities.

Particular examples of how cumulative effects might be considered are:

- Transport – the implications of relevant sites in combination on the road network should be tested within the modeling of the Transport Assessment (TA);
- Air/Noise – these disciplines assess and rely on inputs from traffic flow data and will therefore need to be assessed and related to the overall traffic generation on the network to determine a worst case scenario; and
- Socio-economic considerations.

Others considerations: Sustainability and climate change

The scoping report needs to reflect the environmental credentials of Northstowe, outlined in the Northstowe Area Action Plan, adopted 2007, and the aspirations of the Local Authority and local community. The ES should be explicitly developed to cover the effects of increased carbon dioxide emissions from a climate change perspective and should also include full assessment of measures that can be implemented in order to mitigate the impacts of climate change.

This matter should not be left to the energy statement, where it may not receive adequate consideration, as the ES needs to consider how the new development will respond to the effects of climate change. The themes of climate change minimisation and adaptation do not

feature significantly in the scoping report, and the relationship with building design, green infrastructure etc. will need to be adequately considered in the ES.

The impact of having a development designed for the primacy of sustainable transport needs to be included in all the chapters.

Code for Sustainable Homes: Sustainable Building Construction

The report does not refer to the Code for Sustainable Homes (CSH). There are numerous areas where the CSH requirements should be considered, such as the use of recycled materials in the construction phase, and non-residential development of roads and houses. Similarly, any proposed methods of water efficiency in the new homes, to comply with the CSH, is encouraged and should be discussed in the ES.

Conclusion

The above points when read in conjunction with your report represent the impacts and issues that the ES should address and identifies where more work is required. If you have any questions on any of the above comments please do not hesitate to contact either myself or the relevant consultee directly for clarity or confirmation.

APPENDIX 2: EIA SCOPING OPINION– NORTHSTOWE PHASE 1

Bodies Consulted.

Anglian Water*	Arts Council East
Bar Hill Parish Council	Bedford Pilgrims Housing Association
British Horse Society	BT
Buglife	Cambridge Cycling Campaign
Cambridgeshire County Council*	Cambridge Past Present and Future
Cambridge Primary Care Trust	Cambridge Water
Cambridgeshire Constabulary	Cambridgeshire Ecumenical Council for
Churches	
Cambridgeshire Fire and Rescue	Cambridgeshire Horizons
Cambridgeshire NHS*	Campaign for the Protection of Rural England
Cottenham Parish Council*	County Councillor Gymer
County Councillor Jenkins (David)	County Councillor Johnstone*
County Councillor Read	County Councillor Reynolds (John)
County Councillor Reynolds (Kevin)	County Councillor Smith
District Councillor Burling	District Councillor Bygott
District Councillor Chatfield	District Councillor Corney
District Councillor de Lacey	District Councillor Edwards
District Councillor Ellington	District Councillor Hall
District Councillor Harford	District Councillor Manning
District Councillor Mason	District Councillor Riley
District Councillor Smith	District Councillor Stonham
District Councillor Water	District Councillor Wotherspoon
Dry Drayton Parish Council	East of England Ambulance
EDF	English Heritage
Environment Agency*	Girton Parish Council*
Highways Agency*	Histon and Impington Parish Councils*
Lolworth Parish Council	Longstanton District and Heritage Society*
Longstanton Parish Council	National Farmers Union
National Planning Casework Unit	Natural England*
Network Rail	Oakington and Westwick Parish Council
Old Western Drainage Board*	Ramblers Association
Rampton Drift Residents Society	Rampton Parish Council
RSPB*	Sport England*
Stagecoach*	Sustrans*
Swavesey Internal Drainage Board*	Wildlife Trust
Willingham Parish Council*	

* Those who responded to scoping.