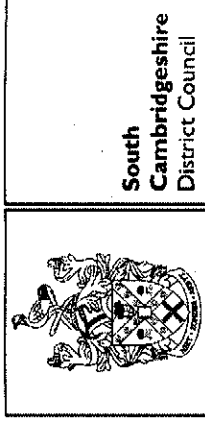


Appendix 2 – Consultee responses

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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

A handwritten signature in black ink that reads "E. J. Green".

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

NHSC – 25/08/11

Cambridgeshire County Council - 02/09/11

RSPB – 24/08/11

Natural England – 25/08/11

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 included 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.scamb.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 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*
Bar Hill Parish Council
British Horse Society
Buglife
Cambridgeshire County Council*
Cambridge Primary Care Trust

Arts Council East
Bedford Pilgrims Housing Association
BT
Cambridge Cycling Campaign
Cambridge Past Present and Future
Cambridge Water

Cambridgeshire Constabulary
Churches
Cambridgeshire Fire and Rescue
Cambridgeshire NHS*
Cottenham Parish Council*
County Councillor Jenkins (David)
County Councillor Read
County Councillor Reynolds (Kevin)
District Councillor Burling
District Councillor Chatfield
District Councillor de Lacey
District Councillor Ellington
District Councillor Harford
District Councillor Mason
District Councillor Smith
District Councillor Water
Dry Drayton Parish Council
EDF
Environment Agency*
Highways Agency*
Lolworth Parish Council
Longstanton Parish Council
National Planning Casework Unit
Network Rail
Old Western Drainage Board*
Rampton Drift Residents Society
RSPB*
Stagecoach*
Swavesey Internal Drainage Board*
Willingham Parish Council*

Cambridgeshire Ecumenical Council for
Cambridgeshire Horizons
Campaign for the Protection of Rural England
County Councillor Gymer
County Councillor Johnstone*
County Councillor Reynolds (John)
County Councillor Smith
District Councillor Bygott
District Councillor Corney
District Councillor Edwards
District Councillor Hall
District Councillor Manning
District Councillor Riley
District Councillor Stonham
District Councillor Wotherspoon
East of England Ambulance
English Heritage
Girton Parish Council*
Histon and Impington Parish Councils*
Longstanton District and Heritage Society*
National Farmers Union
Natural England*
Oakington and Westwick Parish Council
Ramblers Association
Rampton Parish Council
Sport England*
Sustrans*
Wildlife Trust

* Those who responded to scoping.

Cambridgeshire County Council Officer Comments

- i Set out below are Cambridgeshire County Council informal officer comments on the Northstowe Phase 1 EIA Scoping Report, dated July 2011.
- ii The response attached is provided on a without prejudice basis and represents an informal officer view on the issues raised.
- iii A response to the planning application consultation (of which the EIA will form part of the submission) will be endorsed by Members at Cabinet. As such, none of the informal officer information presented below (and in the future) will bind the County Council in any way to the Member endorsed response on the planning application and the information below should not be interpreted as a decision of Cambridgeshire County Council.
- iv The 'likely mitigation' measures stated should not be taken as exhaustive and the Council reserves its position in this respect as the Phase 1 discussions progress.
- v In over-all conclusion, the mitigation package to support the application needs to be comprehensive and allow maximum flexibility for the provision of important public services.

1 Transport

- 1.1 It is noted that a TA Scoping report will be agreed with the County Council and that the EIA 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.
- 1.2 The report does not offer sufficient scope for mitigation. It does not mention bus revenue support for new (or extended) bus services, for example.
- 1.3 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.

2 Public Rights of Way

- 2.1 County Officers welcome the inclusion of RoW consideration in the transport section both in terms of effect on the existing network and the need for enhancement to reflect increased population.
- 2.2 RoWs need to be considered as receptors for noise, air quality etc, remembering the build phase as well as final design. PRow do appear in the document (which is welcomed) but not always in the right places. The assessment will also need to consider where RoW 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 RoW network.
- 2.3 It is understand that the "Promoters are informally seeking stakeholder views on 4 alternative master plan layouts, including alternative provision for secondary school". County Officers have not yet seen these layouts to assess their impacts but there are concerns on how previous commitments impact on a perimeter bridleway and retention of the Longstanton-to-Rampton byway (and other PRow landscape features) and how they are reflected as a green corridor in the new layout.

3 Minerals and Waste

- 3.1 As part of this response, an update on the Cambridgeshire and Peterborough Minerals and Waste Plan is provided at the end of this report.
- 3.2 County Officers have the following comments / concerns:
 - We welcome the inclusion of a Household Recycling Centre and acknowledgement to complete the RECAP toolkit to examine the post-construction waste streams. More information on the construction and demolition waste streams are essential at this early stage, particularly to inform the EIA assessment as part of the construction phases;
 - Whilst we acknowledge the 'earthworks and cut and fill' aspirations 'to enable land raising and re-profiling of the site for drainage purposes' there is little information on the scale of these activities and the potential impact could be

understated. There appears to be no evidence at this stage that this 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;
- What is anticipated to fill these excavations? 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 6.6 acknowledges 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 EIA on a precautionary principle. The delivery of the material to run such facilities should be included as part of the assessment;
- 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?
- 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 EIA 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 EIA 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;

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

4 Biodiversity and Climate Change

- 4.1 Officers have no biodiversity or climate change comments to make other than to advise that the applicant (or their environmental consultants) should be aware the new Green Infrastructure Strategy which has just been published and where Northstowe has been designated as a target area. This document should be considered in the EIA.

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

5 Archaeology

- 5.1 County Archaeology Officers advise that 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 Environmental Impact Assessment for this proposal.

- 5.2 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). 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.
- 5.3 County Officers would also welcome 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.
- 5.4 With regard to the scoping report submitted by the promoters of the proposal, Officers have the following comments:

Currently known baseline

- 5.5 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.
- 5.6 Para 8.3 - I am not aware of an extant track on the eastern perimeter of the airfield.
- 5.7 Para 8.4 - Giant's Hill, Rampton (Scheduled Monument Number 20452) is located within 2km of the site.
- 5.8 Assessment Methodology - officers would support the methodology proposed in this section.
- 5.9 Likely Mitigation Measures - officers would recommend the production of an historic environment management plan 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. We would not consider archaeological watching briefs during the course of construction to be appropriate mitigation in relation to this project.

- 5.10 For information, County Archaeology Officers have already discussed these issues with Gallagher Estates and their archaeological advisor.

6 Community, Education and Health

- 6.1 Paragraph 3.1 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.
- 6.2 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/>

- 6.3 It is noted that SCDC expects a community centre with office space to be provided for 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.
- 6.4 A definition of local services would be helpful to set out what is being considered.
- 6.5 The effects on demand for local businesses is challenged as being 'clearly significant' rather than 'likely significant' given the amount of new residents in this first phase of development.

7 Water, Flooding and Drainage

- 7.1 Northstowe is intended to be an exemplar of sustainable development and therefore such measures should be included. Measures such as SUDS 'will be' appropriate as mitigation rather than 'may be' appropriate

2nd September 2011

SUPPORTING INFORMATION

Update on the Cambridgeshire and Peterborough Minerals and Waste Plan for consideration as part of the future planning application for Northstowe

The Cambridgeshire and Peterborough Minerals and Waste Plan comprises a Core Strategy Development Plan Document (DPD) and Site Specific Proposals DPD. The Core Strategy and Proposals Map C (Minerals Safeguarding Areas) were adopted on 19 July 2011. The Core Strategy supersedes many of the policies within the Cambridgeshire and Peterborough Waste Local Plan 2003 (i.e. those not site related) which will need to be considered as part of any future planning application. Proposals Map C shows the mineral safeguarding areas (which include Northstowe) and relate to policy CS26 in the Core Strategy. Please note Policy CS26 of the Core Strategy sets out the additional information required in relation to Mineral Safeguarding Areas as part of a planning application, and whilst the application area is already part of an allocation in an adopted local development plan document, in the interests of sustainable development additional information should be provided to show the best use of resources are being made in line with this policy.

Whilst not yet adopted, the Site Specific Proposals DPD (which includes allocations at Northstowe for a Household Recycling Centre (W1U) and inert waste processing facility / facilities (W1T)) is currently under Examination and is anticipated to be adopted late 2011/early 2012, so this will also need to be taken into account as part of any future application.

ENDS

Dear Ed

Thanks for the consultation on the scoping study for the Phase 1 application at Northstowe.

I would advise you that 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 an Environmental Impact Assessment for this proposal.

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). 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.

We would also welcome 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.

With regard to the scoping report submitted by the promoters of the proposal, I would make the following comments:

Currently known baseline

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.

8.3 - I am not aware of an extant track on the eastern perimeter of the airfield.

8.4 - Giant's Hill, Rampton (Scheduled Monument Number 20452) is located within 2km of the site.

Assessment Methodology - we would support the methodology proposed in this section.

Likely Mitigation Measures - we would recommend the production of an historic environment management plan 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. We would not consider archaeological watching briefs during the course of construction to be appropriate mitigation in relation to this project.

For information, I have already discussed these issues with Gallagher Estates and their archaeological advisor.

Please let me know if you need any additional information.

Regards

Andy

Andy Thomas
Senior Archaeologist
Historic Environment Team
Direct Dial: 01223 728566

Box CC1008, Shire Hall, Castle Hill, Cambridge CB3 0AP

From: Durrant Edward [mailto:Edward.Durrant@scams.gov.uk]

Sent: 25 July 2011 17:53

To: Whelan Joseph; Adams Linda; Corrance Gerry; Atkinson David; Thomas Andy; Lawson Dearbhla; Duthie Peter

Subject: RE: Scoping study for the Phase 1 application at Northstowe

Importance: High

Dear All

Please see the attached letter and associated documents that detail the request for a scoping opinion that has been received from the Joint Promoters for Northstowe.

Joseph Whelan has agreed to coordinate the County Council's response. Joseph, could you take a look at who I have sent this e-mail to and forward it onto anyone I have missed off, who you would also like to be consulted.

If you have any questions please contact me on 01954 713266 or by responding to this e-mail.

Regards

Ed

Edward Durrant - Senior Planning Officer
South Cambridgeshire District Council

.....
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Visit www.cambridgeshire.gov.uk

25 August 2011

Our ref: 29562

Your ref: PRE/0300/11



Edward Durrant
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Mr Durrant

Planning consultation: Scoping Opinion Consultation

Location: 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

Thank you for your consultation dated 25 August 2011.

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

Designated Conservation Sites

The site is not located in close proximity to any statutory nature conservation sites such as Sites of Special Scientific Interest (SSSI) and as such these statutory sites are unlikely to be directly affected by the development. However some statutory sites are also nature reserves which are open to the public and the possible impacts of increased visitor pressure to publicly accessible sites is discussed further below. There may also be indirect impacts to statutory conservation sites associated with the development of Northstowe through increases in discharges of waste water and pollutants from local sewerage works.

There are a number of important publicly accessible nature reserves within the surrounding area, some of which are designated as SSSIs and others as County Wildlife Sites, which should be considered as part of the EIA. These include the RSPB reserve at Fen Drayton, the Cambridgeshire Past, Present and Future Farming and Wildlife Reserve at Coton, the National Trust Wicken Fen Vision Area and several Wildlife Trust reserves. Such sites could be subject to increased visitor pressure from a significant increase in the local population resulting in damage to sensitive habitats and disturbance to wildlife. These impacts will need to be fully considered in the EIA including the cumulative impact of later stages of the Northstowe development. The need for mitigation through provision of on-site opportunities for informal recreation and provision of improved visitor management facilities for local wildlife sites should also be addressed.

Biodiversity

The biodiversity of the site and its surroundings should be fully identified through appropriate and up to date desk study and field survey information. The desk study should utilise records from the Cambridgeshire and Peterborough Environmental Records Centre and other relevant local groups. Field surveys should aim to fully describe biodiversity receptors which are likely to be of significant value. In addition to the surveys identified for updating in section 12.10 of the Scoping Report we would recommend that the need for detailed and up to date botanical and terrestrial invertebrate surveys is also considered. The scoping report does not provide a detailed description of the habitats

within the site but features such as semi-improved grassland, hedgerows and ditches may be of value to these groups.

We generally support the proposed scope of the assessment with regard to Natural Heritage although as discussed above we would advise that off-site receptors including nature reserves in the surrounding area are also considered. With regards to gains and losses of habitats within the site Natural England would strongly recommend that the principles of avoiding harm to existing habitat wherever possible, achieving no net loss of biodiversity and enhancing the biodiversity value of the site above its existing baseline wherever possible are pursued as required by national planning policy in PPS9. To aid working to these principles we would advise that a balance sheet approach to losses and gains of habitats is undertaken as has been adopted previously at the site. This will allow the suitability of site design, on-site mitigation and the need for further off-site compensatory habitat creation to be assessed with clarity.

Section 12.13 of the Scoping Report correctly identified that the detailed mitigation cannot be devised ahead of completing the prior stages of the EIA. However we would suggest some further measures that are likely to be important within the mitigation strategy. Firstly the principle of creating a functional ecological network within the site should be identified. This will be necessary to avoid harmful effects of habitat fragmentation whereby development results in small areas of habitat becoming isolated and wildlife therefore becoming unable to survive. The development masterplan will need to be designed to ensure that retained and newly created habitat areas should be connected by appropriately designed wildlife corridors. A further consideration within the mitigation for biodiversity will be ensuring that a sufficient quantity of natural habitats are retained and created within the site to avoid them becoming subject to excessive recreational pressure such as trampling and disturbance. Similarly the capacity of the site to provide opportunities for informal recreation will need to be sufficient to avoid excessive pressure on other sites in the surrounding area. In terms of habitat creation off-site compensation is likely to be needed for the loss of farmland habitat. This is because arable farmland supports a range of Biodiversity Action Plan priority species such as brown hare, skylark, corn bunting and yellowhammer which are unlikely to be readily accommodated within the site. Finally provision will need to be made for the long term care and management of the network of natural habitats to be created within the site both through the development of a Biodiversity Management Plan and provision of resources to carry out the management included.

Landscape

Natural England is satisfied with the proposed scope of the landscape assessment. We note that whilst the site falls within the Bedfordshire and Cambridgeshire Claylands National Character Area it is also close to neighbouring character area of The Fens. The landscape may well therefore be transitional and contain features characteristic of a fen edge landscape. The likely mitigation measures identified include a high quality and sensitively designed masterplan. To achieve this we would suggest the design will need to focus on including features which will augment local landscape character to help ensure the development proposals are distinctive.

Green Infrastructure

Due to its multi-functional nature green infrastructure does not fall neatly into any of the proposed chapters of the Environmental Statement but never the less it does make a vital contribution to many aspects of sustainable development. For example the greenspace network within a new development must contribute significantly towards achieving sustainable travel, opportunities for informal recreation, healthy lifestyles, flood attenuation and climate change adaptation.

The proposed Environmental Statement structure includes a chapter on Community, Economic and Social Effects. We note the key issues of this chapter do not include evaluating the impact of the development design on the health and well being of the future residents. Should your authority deem this to be a relevant consideration for the EIA then provision of greenspace should certainly feature as it is thought to influence life expectancy, obesity related health problems and incidents of mental illness. Further details are provided in this Faculty of Public Health / Natural England publication:

http://www.fph.org.uk/uploads/r_great_outdoors.pdf

The themes of climate change minimisation and adaptation do not feature significantly in the proposed Environmental Statement. Clearly the roles of green infrastructure in providing attractive options for sustainable transport and in mitigating the urban heat island effect are significant in this context and, again, should your authority require the issue of climate change to be addressed by the EIA we would recommend that its relationship with green infrastructure is taken into account.

As a more general comment of green infrastructure provision we would like to draw your attention to the Accessible Natural Greenspace Standard (ANGSt) ([available in full here](#)) which recommends that everyone should have access to the following levels of natural greenspace:

An accessible natural greenspace of between 2 and 20 hectares in size, no more than 300 metres (5 minutes walk) from home;

One accessible 20-100 hectare site within 2 kilometres of home;

One accessible 100-500 hectare site within 5 kilometres of home;

One accessible >500 hectare site within 10 kilometre of home;

One hectare of statutory Local Nature Reserve per thousand population.

Our analysis of ANGSt across Cambridgeshire has identified that the area where development is planned currently falls within the recommended catchment of a 500 ha site but is deficient at the level of smaller more local sites, in particular the 2ha and 20ha elements of the standard. The provision of a suitable level and distribution of on-site informal greenspaces will therefore be vital in providing the new community with ready access to this resource.

As you may be aware Natural England has previously offered to provide South Cambridgeshire District Council with expertise and resources to assist you in assessing the design proposals for this site with regard to green infrastructure. We would still be willing to contribute to this and in particular to help you to evaluate how the greenspace network within the Northstowe masterplan fulfils the functions of green infrastructure. The following recent guidance could form the basis for such an assessment: Green Infrastructure by Design – Adding Value to Development ([which can be downloaded here](#)).

I hope that this response is helpful to you, however please do not hesitate to contact me if you wish to discuss any of the points raised further.

Yours sincerely



Ross Holdgate
Land Use Operations

Tel: 0300 060 4657

Fax: 0300 060 2115

ross.holdgate@naturalengland.org.uk

Durrant Edward

From: Waddams, Tony [tony.waddams@environment-agency.gov.uk]
Sent: 22 August 2011 10:28
To: Durrant Edward
Subject: Phase 1, Northstowe.
Attachments: image001.png

Hi Ed

Sorry for delay, just back from leave.

Tony



**ENVIRONMENT
AGENCY**

Edward Durrant
South Cambridgeshire
District Council
Development Control
South Cambridgeshire Hall
(6010) Cambourne Business
Park
Cambourne
Cambridge
CB3 6EA

Our ref: AC/2011/115001/01-L01
Your ref: PRE/0300/11
Date: 22 August 2011

Dear Sir

**PROPOSED PHASE 1 OF NORTHSTOWE DEVELOPMENT INCLUDING INFRASTRUCTURE,
LAND ADJACENT HATTONS ROAD AND WEST OF LONGSTANTON - REQUEST FOR
SCOPING OPINION.**

Thank you for consulting the Environment Agency with regard to a Scoping Opinion for the Proposed Phase 1 of the Northstowe development.

We have the following comments to make.

Development & Floodrisk:
Section 16 – Water, flooding and drainage.

In view of the development of Northstowe now potentially being delivered in stages over an extended time period, a clear understanding of what must be delivered prior to any phased development must be agreed at an early stage with the local authority as part of associated planning conditions.

It would be prudent, therefore, for any revised EIA to identify the various phases of the development and what will be delivered when. This will also reduce the need to go through the whole process again when any Phase 2 applications are potentially progressed.

The principles for the surface water drainage of the whole development of Northstowe were previously agreed. However, they were always subject to detailed design identifying the phased implementation. As the area is politically sensitive, particularly with regard to flood risk issues, any revised drainage strategies will need to be agreed prior to submission as part of any planning application.

You will be aware, however, that the Environment Agency currently holds an Objection to the previous application, planning reference S/7006/07, owing in particular to insufficient details regarding surface and foul water drainage issues.

I attach a copy of our previous letter to the local authority reference AC/2008/104753/01-L01 dated 26 March 2008 for your consideration. You may wish to address some of these issues within any revised EIA.

Groundwater & Contaminated Land:

The western section of the Primary development area is located on a Secondary A Aquifer - River Terrace Deposits of Sand and Gravel. Secondary A Aquifers are permeable geological strata capable of supporting water supplies at a local scale and in some cases form an important source of base flow to rivers.

The overlying soils at the site are classified as having an intermediate leaching potential, meaning they can moderately transmit a wide variety of pollutants to the groundwater. The local use of groundwater in this area makes the site highly vulnerable to pollution.

Section 9 of the EIA Scoping Report lists potential sources of contamination to include the golf course and its car park, the former railway line to the east of the site, a farm and the former Oakington Barracks and airfield to the south. These land uses are identified in Table 2.1 of Planning Policy Statement 23 (PPS23) as uses that may be affected by contamination. The Department of the Environment Industry Profiles for these land uses indicate that potential contaminants include hydrocarbons, metals and polycyclic aromatic hydrocarbons. These substances have the potential to move from the soil into the groundwater.

The Environmental Statement must therefore include a scheme to deal with the risks associated with contamination. Without this information, we will consider the risk posed to groundwater's and inland fresh waters to be unacceptable and will object to the development in accordance with Planning Policy Statement 23 and Policy P9-6 of our Groundwater Protection: Policy and Practice document.

The Environmental Statement should include at least a comprehensive preliminary risk assessment (PRA), with associated conceptual site model. The PRA should include historical plans of the site at original scales and an understanding of the sites environmental setting including geology, hydrogeology (including the interaction between all relevant shallow and deep groundwater's and how they flow to potential receptors), location and status of relevant surface water and groundwater receptors, identification of potential contaminants of concern, source areas and information on pollutant pathways. Pictorial representations, preferably scaled plans and cross sections, will help support the understanding of the site as represented in the conceptual site model.

We recommend that developers:

- 1) Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
- 2) Refer to the Environment Agency Guiding Principles for Land Contamination for the type of information required in order to assess risks to controlled waters from the site. The Local Authority

can advise on risk to other receptors, e.g. human health.

3) Refer to our website at www.environment-agency.gov.uk for more information.

Fisheries, Recreation & Biodiversity: Natural Heritage.

As with any development the protection of wildlife and supporting habitat should be ensured and opportunities secured for the enhancement of the nature conservation value of the site in line with national planning policy.

Planning Policy Statement 9 (PPS9) requires that planning decisions should prevent harm to biodiversity interests (PPS9: Key Principles) and should also seek to enhance and expand biodiversity interests where possible.

Ecological survey requirement.

An ecological survey is required prior to the development of detailed plans, to enable an assessment of the level of risk posed by the development. Without such information, it is not possible to judge whether the proposals would meet the requirements of Planning Policy Statement 9 (key principles 1i) requiring planning decisions to be "based on up to date information about the environmental characteristics of their areas". The detailed design, construction, mitigation and compensation measures should be based on the results of a survey carried out at an appropriate time of year by a suitably experienced surveyor using recognised survey methodology.

The survey and risk assessment should:

- § identify any rare, declining, protected or otherwise important flora, fauna or habitats within or likely to be affected by the site, including the potential areas of excavation;
- § assess the importance of the above features at a local, regional and national level;
- § identify the impacts of the scheme on those features,
- § demonstrate how the development will avoid adverse impacts;
- § demonstrate how the development will retain and protect existing ecological features;
- § propose mitigation for any adverse ecological impacts or compensation for loss;
- § propose wildlife/ habitat enhancement measures;
- § propose post-project appraisal, management plans and management responsibilities with details of how biodiversity enhancement will be incorporated into the development and maintained over the long term.

With reference to the Northstowe Phase 1 EIA scoping report of July 2011, section 12 Natural Heritage, the status of the Over Railway Cutting CWS should be checked following construction of the guided busway.

Area Environment Planning Teams.

Waste.

The applicant shows a positive approach to waste management at the construction and post construction phases and has addressed many of the issues with regard to waste. The site will adhere to the Site Waste Management Plan Regulations and by doing so minimise and recycle waste using permitted waste sites and carriers.

The use of recycled materials in the construction phase should consider the Code for Sustainable Homes and non-residential development of roads and houses.

The design of the development should incorporate waste storage containers and safe collections of waste.

Water Quality/wastewater comments.

The Environmental Statement should include "a description of the likely significant effects of the

development on the environment, which should cover ... any indirect, secondary ... effects of the development ..." as directed by Part 1 of Schedule 4 of the 1999 EIA Regulations.

From a water quality perspective, it is important to recognise that the greatest impact of the proposed development is more likely to be manifest on the Swavesey Drain as a result of an increase in discharge rate from Utton's Drove sewage treatment works (STW).

Sections 16.12 and 16.13 do acknowledge this (kind of), but the table in Appendix B also needs to reflect this risk. At present it merely highlights a potential impact on ponds and ditches in the immediate environs of the site during construction.

Much of the assessment proposed by this Scoping Opinion has already been carried out in the guise of a Detailed WCS for the Cambridge Area. The WCS identifies potential water services infrastructure and water quality issues associated with planned growth at Northstowe and other large developments in the wider District, and recommends measures to address them. As such, the evidence required by this Environmental Statement is already in the public domain.

The Environmental Statement for this proposed development should reference the WCS and only need provide additional information and assessment for any scenarios not already covered.

Similarly, the findings and recommendations of the WCS should ultimately be incorporated into this development proposal and I would expect to see a statement incorporated into the Environmental Statement to confirm this.

Water Resource Comments.

The Environmental Statement should consider the provision of mains water to the proposed development.

The development lies within the area traditionally supplied by Cambridge Water Company (although the developer may choose to take supply from another company, and the Agency would encourage consideration of minimising the environmental impact of providing a water supply). It is assumed that water will be supplied using existing sources and under existing abstraction licence permissions. The developers/planners should seek advice from the water company to find out whether this is the case, or whether a new source needs to be developed or a new abstraction licence is sought. The Environment Agency may not be able to recommend a new or increased abstraction licence where water resources are fully committed to existing abstraction and the environment.

Any proposed methods of water efficiency in the new homes is encouraged and should be discussed in the Environmental Statement

The Agency would encourage the developer to explore the issue of efficient use of water in the home with Cambridge Water. It is assumed that new houses will be constructed with water meters fitted. Other water saving features that we wish to see incorporated include low flush toilets, low flow showerheads, water butts for gardens etc.

The Environmental Statement should consider impact to water features and licensed and unlicensed abstractions.

IT IS THE RESPONSIBILITY OF THE DEVELOPER TO ENSURE THAT THE DEVELOPMENT WILL NOT AFFECT ANY WATER FEATURES (i.e. WELLS, BOREHOLES, SPRINGS, STREAMS

OR PONDS) IN THE AREA, INCLUDING LICENSED AND UNLICENSED ABSTRACTIONS. There are 2 licensed abstractions within a 2km radius of the site, one of these held by Cambridge City Golf Course and within the proposed development site.

Certain private water supplies do not require a licence; therefore the Environment Agency is not necessarily aware of their existence. The locations of private domestic sources may be held by the local District Council on the register required by the Private Water Supplies Regulations 1992.

I hope this is of assistance to you

Yours faithfully

Mr. T.G. Waddams
Planning Liaison Officer

Direct e-mail planning_liaison.anglian_central@environment-agency.gov.uk

Enc: AC/2008/104753/01

Development Control
South Cambridgeshire District Council
South Cambridgeshire Hall
(6010) Cambourne Business Park
Cambourne
Cambridge
CB3 6EA

Our ref: AC/2008/104753/01-L01

Your ref: S/7006/07

Date: 26 March 2008

Dear Sir/Madam

CREATION OF NORTHSTOWE NEWTOWN COMPRISING OF 9500 DWELLINGS AND ASSOCIATED COMMUNITY AND HIGHWAY INFRASTRUCTURE, LAND INCLUDING THE FORMER OAKINGTON BARRACKS.

Thank you for forwarding the above application

A copy of the decision notice would be appreciated

For your information this application falls within Cell G7 (floodzone 1/ > 1ha) of the Environment Agency's PPS25 Flood Zone Standing Advice Matrix (March 2007). In line with current government guidance on Standing Advice, it will not be necessary, in this instance, for your Council to respond on behalf of the Agency, in respect of land drainage /flood defence issues using the matrix, which can be found at; <http://www.pipenetworking.com/floodrisk/>.

The Environment Agency has no Objection in Principle to the proposed development and associated link roads; however, we have a number of concerns that require additional information before the proposals could be considered conditionally viable.

We therefore **OBJECT in detail** to the planning applications as presented, on the grounds that the following issues are fundamental and must be resolved prior to determination of the application(s).

Surface and foul water drainage issues are fundamental to a sustainable major development; we do not consider that they have been adequately addressed at this stage.

Delivery.

How will the drainage proposals be delivered and by whom?

Phasing.

How can the development be effectively phased to ensure nothing is built prior to adequate mitigation and infrastructure being in place?

Ownership.

Who will own the component parts of the strategic drainage systems?

Responsibilities.

Where will the responsibilities lie for continued upkeep for maintenance, repair and potential rebuild, and how are these responsibilities protected in perpetuity?

Funding.

How will the proposed facilities be adequately funded in perpetuity?

Effectiveness.

It has not been adequately demonstrated that the proposals would function satisfactorily, as presented.

S.106.

No specific mention of a S.106 Agreement and drainage issues has been made. The Agency would wish to be part of any discussion in this particular respect.

Surface Water Drainage.

Application 1 - Core site.

As you are aware, the Environment Agency has been involved in discussions regarding the surface

water drainage from the core site for a number of years and we believe the proposals exceed the requirements of PPS25. We have been working with all interested parties in a Northstowe Technical Liaison Group (TLG) to ensure any future development is considered safe and sustainable.

We believe the core site demonstrates that it is not at risk from flooding and will not cause nor exacerbate flooding elsewhere to a minimum level of a 1 in 200 year event plus the foreseeable climate change allowance for the next 100 years.

However, once in place, the Drainage Strategy must be continuously maintained. The ownership and/or adoption of these facilities will need continuous funding to ensure effective drainage in perpetuity with the new Town. This has not been adequately addressed at this stage.

Whilst Section 9.1.8 of the Sustainable Water Management Strategy (SWMS) states that a significant part of the earthworks will be undertaken during Phase 1 of the development, there is no clear indication of what is proposed to be in place when development begins.

Current discharge from Reynold's Drain to Cottenham Lode is via a flapped outfall, which only allows outflow when the Lode is not at high levels. An overspill weir then enables water to pass into the Old West IDB system. This will mean eventual pumped discharge from the lakes will need careful consideration and sensitive telemetry control or there will be significantly more loading on the pumped discharge to the Lode to drop lake levels. It will therefore be important to have inter-lake connections to prevent an imbalance of water levels.

Section 12 of the SWMS indicates possible future responsibilities and funding mechanisms but unless these can be agreed **prior to determination** the Strategy will fail. New development can be considered to have a lifetime of 100 years for residential properties but a new town is forever! House sites may be rebuilt but the overall Drainage Strategy needs to be maintained in perpetuity.

Application 2 – Longstanton Link Road.

The calculations for road drainage attenuation volumes are theoretically appropriate and conservative. The drainage appears to use the Longstanton Brook flood mitigation facilities, with the Highways Agency providing the roadside ditches to these ponds. However, Cross-Section Drawings Ap2/LS002 & LS003 do not incorporate any such ditches.

We do not currently fully understand the mechanisms for the proposed flood mitigation ponds and how they also attenuate runoff from the roads with associated discharge rates.

Section 5.3.20 of the Flood Risk Assessment (FRA) state that flood mitigation control will be via an adjustable side inlet weir, which implies water will only enter the ponds when a certain level is achieved within the channel. However, Drawings 1768/FLD/04 & 05 imply an in-channel flow-splitter reducing base flows as well as high flows.

It should be noted here that Consent of the Environment Agency under the Land Drainage Act 1991 will be required for any works to the watercourse(s). Any adjustable structure will need to be set by our agreement and any future alteration will require a revised Consent.

Owing to the existing channel and culvert restrictions within the village of Longstanton, natural attenuation occurs to the downstream Swavesey Drain system, which can be tide-locked when

Webb's Hole is shut, owing to high levels in the River Great Ouse. However, there are currently local arguments that local heavy rainfall should be encouraged to reach Webb's Hole as soon as possible before the slower-reacting Great Ouse rises. The reduction in peak flows as proposed will reduce flooding in Longstanton but more information should be provided to demonstrate this will not increase overall retained volumes in the Swavesey Drain system owing to the potential slower release of the upstream catchment runoff.

It is noted that the proposals potentially reduce flows in Longstanton Brook by approximately 25% across the modelled flow ranges, which means as catchment flows increase owing to climate change, the remaining 75% base flow through Longstanton for set return periods will also potentially increase over time.

Future ownerships, maintenance responsibilities and funding mechanisms will need to be agreed prior to determination.

Application 3 – Oakington Link Road.

Again, we have similar concerns that the Cross-Section Drawing Ap3/LS002 does not incorporate any road ditches.

We currently do not fully understand the mechanisms for the proposed bifurcated channel and flood mitigation ponds and how they also attenuate highway runoff to its required conservative discharge rates. We also need clarification of the modelling as we believe a major flow input may have been misrepresented.

Oakington Brook from downstream of the A14 is a designated main river and Consent of the Environment Agency under the Water Resources Act 1991 will be required for any works to the watercourse. We are currently investigating how we can increase the Standard of Protection from statutory Main River flooding through Oakington and will need to understand how the upstream attenuation is proposed to operate so that we work with the resultant flows. To this end, our consultants in this instance, Halcrow, will be examining the modelling on our behalf with preliminary results already passed to WSP for comment.

As with Application 2, future ownerships, maintenance responsibilities and funding mechanisms will need to be agreed prior to determination.

Application 4 – A14 Access Corridor.

Similar concerns to Applications 2 & 3, in that we do not currently understand how highway runoff is controlled.

Foul Water Drainage.

There are currently significant concerns regarding any proposed material increase in discharge from the Utton's Drove Sewage Treatment Works (STW). It discharges to Utton's Drove Drain and thence to the Swavesey Drain limited-capacity embanked system, which becomes tide-locked during high levels in the River Great Ouse.

Existing discharge rates are already causing erosion problems in Utton's Drove Drain and may also reduce the capacity within the embanked Swavesey Drain system. There would be a potential increased flood risk for Swavesey and surrounding land with any further increase in discharge from the STW without suitable mitigation.

Within the Northstowe TLG we have considered foul water drainage as equally important as surface water drainage and flood risk, with regard to its quantitative aspect. The Options presented in Section 5.5 of the FRA are two of a number discussed.

Option 1A is the most cost-beneficial (<£1m) both in implementation and running costs but it will require additional mitigation to prevent increased erosion and potential increased channel maintenance to avoid reduced conveyance capacity owing to increased siltation problems.

Option 1B is costly (>£6m) and can not be implemented for a number of years, leaving an interim period with inadequate facilities.

Any solution to the utilisation of Utton's Drove STW for future development needs to be found strategically, as it is not just the problem for Northstowe but for any new connection to the STW, including single-house proposals! However, funding would be different for each option.

Future ownership of any new pump proposed in Option 1A must be established prior to determination of the current Applications, however, along with any maintenance responsibilities and funding mechanisms, which should not rest entirely on Northstowe. Costs and funding may need to be found on a proportional basis from all new development connecting to the STW. This may need to include to any required channel mitigation.

If Option 1B is adopted, then interim measures must be proposed before the pipework can be brought on line. Costs in this instance would need to be found by Anglian Water through their appropriate funding mechanism (therefore costs likely to be passed on as a general increase to foul drainage rates).

Please see comments for Water Quality, particularly regarding Option 1A above.

The Agency has made additional comments in respect other environmental issues in the attached Addendum 1 document.

Yours faithfully

MR T G WADDAMS
Planning Liaison

Direct e-mail planning_liaison.anglian_central@environment-agency.gov.uk

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24/08/2011

The proposed project is located in an area that is currently zoned for residential use. The project would consist of a new building and associated parking spaces. The project would be subject to the same zoning requirements as other residential projects in the area.

The project would not be implemented for a number of years, leaving an opportunity for the community to provide input on the project.

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Environmental Impact Statement

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