NORTHSTOWE
PHASE 2 PLANNING APPLICATIONS

Environmental Statement (Volume II):
Appendix A Scoping

August 2014

Homes & Communities Agency

Appendix A1

Scoping Responses

A1 Scoping Responses

The table below lists the compiled responses that were received from SCDC and statutory consultees. How each of these comments has been addressed within the ES is also provided.

The formal scoping response received from SCDC compiled comments received from the following external consultees:

- Anglian Water
- Cambridgeshire Constabulary
- Cambridgeshire Fire and Rescue
- English Heritage
- Environment Agency
- Highways Agency
- Natural England
- Cambridgeshire and Peterborough Clinical Commissioning Group
- CATCH – the local Clinical Commissioning Group
- NHS Property Services
- Public Health which is part of Cambridgeshire County Council, and
- NHS England
- Cambridgeshire Travel for Work Partnership

Topic	Scoping comment	EIA response
Cumulative impacts assessment	The CIA should consider the following developments: 1) A14 Cambridge to Huntington Improvement Scheme 2) Home farm, Longstanton	These have been included within the environmental assessments.
Northstowe Phase I development	It is the view of the authority that the phase 1 consented development should be assessed as part of the future baseline.	Phase I has been included as part of the future baseline.
Mitigation measures (general)	The ES should make a hierarchical approach to mitigation measures clear and seek to avoid and/or design out impacts in the first instance. The ES should include climate change mitigation and adaptation and resilience; addressing both negative and positive impacts.	Where possible design mitigation has been incorporated and is discussed within each environmental topic chapter where appropriate.
Air quality	SCDC is generally satisfied with approach and proposed monitoring.	No response needed
	Other non-vehicular sources of emissions should be considered in assessment	Presumably refers to energy centre emissions and construction. Construction dust has been covered in assessment. Energy centre strategy has not yet been defined, a range of options are under consideration so would be abortive to model any single option.
	The ES should also consider the impact of the introduction of new receptors close to the A14 and the B1050, both of which generate air pollution	Included.
	The authority suggests that since the monitoring station at Bar Hill has now been decommissioned that this should be replaced by the Girton monitoring station for future validation requirements	We did not have traffic data available for those links near Girton Monitoring station. We did however use the Impington and Orchard park monitors for model verification. As verification base year was 2011 we also used historical Bar Hill data. Three continuous monitors and 17 diffusion tubes have been used to verify the model which we feel is robust.
	A Low Emissions Strategy should be provided as part of the application	Included.
Community, social and economic effects	The submission of the HIA as a separate document is acceptable. However, there will need to be clear cross-referencing between the two documents and you should avoid the duplication of information where possible.	The HIA is being submitted as a separate document and cross referencing has been made where relevant. Ian Green was consulted on the scope of the HIA.

Topic	Scoping comment	EIA response
	HIA scoping should be agreed with Ian Green	
	Rampton Drift should be identified separately as an area of existing residents which might be adversely or beneficially affected by Phase 2 and therefore should be classed as a separate geographic area for study and inclusion within the ES and the Health Impact Assessment (HIA)	Rampton Drift is considered in terms of effects that would be experienced as a result of Northstowe Phase 2.
	A plan showing distances from open space and sports provision to residential locations should also be provided in order to assess any links between car dependency and vehicle emissions and easy access to recreation. The amenity value and use of the cycle ways may be affected post construction and an assessment should be included with the ES and HIA.	This is included within the Transport assessment and shown in Figure 7.1 and Figure 7.2
Archaeology and Cultural Heritage	The baseline study should include any new archaeological investigation undertaken since the previously submitted planning application for Phase 1 of Northstowe.	No archaeological investigation has taken place within the study area since the submission of the Phase 1 application.
	The baseline should also acknowledge the progress of the phase 1 archaeological works which are likely to provide an enhanced understanding of archaeological patterns and may be directly linked to phase 2 development	The implications of the Phase 1 archaeological works are considered as part of the cumulative assessment.
	Officers recommend that the impact of the development on the historic environment should be considered as part of an ES for the site. The assessment should include non-intrusive (geophysical survey, field walking) and intrusive (trial trenching) techniques in those parts of the site which have not been assessed, in agreement with Cambridgeshire County Council's Heritage Service.	CHET indicated in the consultation meeting held in April 2014 that the surveys already undertaken are sufficient to allow an assessment of the impact of the proposed development to be made. This view was confirmed at a consultation meeting held in June 2014. Written clarification of original advice to be provided by CHET.
	The ES should include the results of these surveys and consider methodologies to mitigate the impact of the development on archaeological assets. This might include excavation in advance of development, assessment and publication of the results, or might include preservation in situ where this is merited by the significance of the assets	An outline Heritage Strategy which sets out the general approach to mitigation has been included in the Planning Statement.

Topic	Scoping comment	EIA response
	The layout of ditches may have some historic basis and this should form an additional area of study, as well as to inform the necessary retention and continuity of important drainage watercourses to avoid flooding on and beyond the site. Moreover, officers would expect the consideration of historic assets to be of the specific characteristics of each asset; and the observations to be updated by those actual findings, rather than to be based on a predicted matrix	Consultation with CCC in June 2014 established that this comment needed to be clarified as it does not on the face of it apply to the heritage topic. Clarification awaited.
	It is unlikely that a watching brief would be an acceptable form of mitigation on this site and investigation is likely to be required in advance of construction but prior communication with the County Council's Heritage Officer is required in order to agree what is acceptable.	An Historic Environment Management Plan will be developed through dialogue with the Heritage Officer at an appropriate point in the development programme.
	Outreach and education programmes should be considered as well as on site interpretation.	Outreach and Education programmes are considered in the outline Heritage Strategy.
Geology, Hydrogeology and soils	All contaminated land considerations should be assessed in accordance with best practice guidance nationally and locally including the South Cambridgeshire District Council's "District Design Guide: High Quality and Sustainable Development in South Cambridgeshire."	The assessment has been carried out in accordance with best practice guidance including Cambridgeshire District Council's "District Design Guide: High Quality and Sustainable Development in South Cambridgeshire."
Landscape and Visual	The ES should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. Natural England encourages the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2002.	A full assessment has been carried out on 12 local character areas in and around the site area taking into account the pertinent National Character Area (summarised within the baseline) and the GLVIA3.
	Natural England's Landscape Character Assessment for the area in and around Northstowe has been published and the proposed ES should include reference to this.	As above. The study area lies within the Natural England National Character Area 88: Bedfordshire and Cambridgeshire Claylands. Key features are described within the baseline and have informed the identification of the 12 local character areas.

Topic	Scoping comment	EIA response
	From a landscape perspective, the important issues to address within the ES are: • visual impact on views of the proposed development (including southern access roads) and how that will affect the setting of existing settlements; • Direct landscape impact on the existing and valuable vegetation (for screening and ecology) on the site (trees and hedge belts). This may be an immediate impact through removal of vegetation to allow construction as well as latent impact through constructing too close to existing vegetation; and • The impact of any noise mitigation measures e.g. noise barriers/bunding on landscape.	Addressed as follows: • 20 viewpoints have been selected for the assessment. Viewpoints 5, 15 and 19 address impacts from the Southern Access Road. • All significant vegetation on site has been identified in the baseline and in Figure 15.4 and all impacts on this vegetation in construction and operation have been assessed. Earth bunding on site will be limited to the attenuation pond areas within the Water Park in the east of the site. Impact of this mounding has been fully assessed in the LVIA
	The development will generate some waste from demolished buildings, hard-standings, subsoil, stripped topsoil etc. There will be opportunities for retaining this on site and the ES should consider the impacts of this.	As above. Earth bunding will be limited to the Water Park and will be carefully integrated into the surrounding landscape. There will also be scope to include subtle earth mounding around the pedestrian bridge to help integrate into the landscape. The LVIA considers the impacts of these topographical features.
	The effects of this lighting need to be considered in terms of obtrusive light spill / glare and sky glow and where significant effects are predicted, mitigation measures should be proposed and residual effects assessed.	A separate lighting assessment has been carried out and is included within the ES (Appendix J2).
Lighting	The impact of lighting may be of a wider interest to other specialisms such as ecology, community safety and highways. An assessment should be undertaken that considers the baseline lighting conditions and the potential artificial lighting impacts during site preparation, construction and operation in relation to surrounding sensitive receptors including local residents, the night time amenity including sky glow, sensitive landscape and ecological features, road users and pedestrians.	A separate lighting assessment has been carried out and is included within the ES (Appendix J2).
Wind effects	Whilst it is acknowledged that wind effects may not be significant at the	Wind effects were considered in the design proposals and brief

Topic	Scoping comment	EIA response
	lower levels, the nature of the landscape is particularly flat and therefore it is considered that reference should be paid to the impact of wind and opportunities to design out impacts at the early stages through appropriate orientation of buildings, landscaping, urban form, etc.	comment has been made on how this has been integrated into the design.
Ecology	Officers support the view presented in the Scoping Report that the proposed development will have a significant impact on the site's ecology and that appropriate surveys following IEEM standards are required to inform the ES.	Noted.
	With regards to further survey work a repeat reptile survey is required to account for potential changes following translocation of reptiles and considering their prevalence on the phase 1 application site.	This comment was discussed with Rob Mungovan during a meeting on 15th April and it was agreed that further reptile survey work was not necessary.
Noise & Vibration	The impact of the development on the receiving environment is key and if the "existence of the development" itself includes or introduces noise sensitive receptors itself such as residential premises or schools, then any significant noise effects / impacts associated with the development on sensitive receptors intrinsically as a whole should be at the very least considered.	Assessment has considered construction and operational noise impacts as a result of the proposed development on the existing environment.
	All residential properties are sensitive receptors and include both existing occupants of residential properties in adjoining residential areas and future residents of the proposed Phase 1 and Phase 2 development.	Assessment has considered construction and operational noise impacts as a result of the proposed development on the existing environment.
	In addition to the potential noise sources and activities detailed under construction, consideration should also be given to the location and siting of primary construction access junctions, haul roads / routes to and on the development site and or similar. These require careful consideration in terms of duration of use and impact on noise sensitive premises.	This level of detail is not available at this stage (outline planning) and will be dealt with at detailed design stage.
	Any cumulative impacts with Phase 1 should be included.	Phase 1 has been included in the traffic data on the existing road

Topic	Scoping comment	EIA response
		network and has therefore been included in prediction of future noise levels. The assessment has considered traffic data available at this stage.
	Subject to the level of information submitted within the outline planning application (or full planning applications in relation to the southern access roads) the impact of traffic noise from primary roads within phase 2 on future noise sensitive premises that form part of the development itself requires numerical noise modelling / contouring to various floor levels.	The assessment has considered traffic data available at this stage.
	With regard to the location of any Local Area for Play (LAP), Local Equipped Area for Play (LEAP) or Neighbourhood Equipped Area for Play (NEAP) or similar due regard should be given to the minimum distance Buffer Zones (the space between the facility and the nearest residential property, which is required to minimise disturbance) as detailed in SCDC's Local Development Framework, Open Space in New Developments, Supplementary Planning Document, Adopted January 2009.	Local play areas or similar will be assessed at detailed design stage when the location and size of existing buildings, road layout etc. can be accurately considered in predicting noise impacts on these areas.
	The final noise significance of impact assessment methodology / remit and actual updated / validation of baseline / background noise surveys including duration and monitoring locations should be fully agreed with SCDC's Health & Environmental Services in advance.	Baseline has been updated as agreed with EHO for SCDC.
	Particular regard should be given to incorporating the B1050 Longstanton western bypass, which was completed in 2008 and the CGB which commenced operation in August 2011 into the baseline survey data. In both cases they commenced operation after the undertaking of initial background baseline noise surveys at 23 receptors in 2003 and 2006	B1050 has been considered in baseline noise surveys, and more importantly in modelling of future noise impacts
	The approach proposed for construction traffic impact assessment is also acceptable. However any assessment should also acknowledge the	Assessment has considered acknowledge the advice given in 5228: 2009 +A1: 2014 Part 1 section E.4 (BS5228: 2009 updated

Topic	Scoping comment	EIA response
	advice given in 5228: 2009 Part 1 section E.4 'Example of criteria for the assessment of the significance of noise effects' on construction noise trigger level exceedance for certain periods / duration and the possible offer of a scheme for the installation of noise insulation or the reasonable costs thereof, or a scheme to facilitate temporary rehousing of occupants, as appropriate.	in 2014). Assessment of requirements for Noise Insulation and /or temporary re-housing can only be considered at detailed design stage when a contractor has been appointed and construction method/ plant to be used is finalised.
Traffic and Transport	The detailed scope of the TA will need to be agreed with the County Council.	The scope of the TA has been agreed in consultation with CCC
Waste	Although construction waste will be covered under the Site Waste Management Plan (SWMP) there will be "substantial amounts of waste" as a result of the development. It is therefore recommended that the impact of waste be considered by the ES.	A waste assessment has been included within the ES (Chapter 13)
	The routing of vehicles removing waste from site will also need to be assessed under the appropriate section	This has been considered as part of the transport assessment.
	The waste strategy and audit may sit outside the ES, but the information within it should inform the ES in terms of the nature and the impacts arising from the temporary inert waste recycling facility (capacity / duration / types and quantities of waste materials going through it etc.).	The waste strategy has informed the ES.
	There needs to be a clear distinction between the construction phase and the operational phase.	A distinction has been made between the two phases.
	It is stated that, as the quantities involved are likely to be insignificant in relation to existing waste generation and management in South Cambridgeshire, it is proposed that municipal waste is not scoped into the EIA and will not be considered in the ES. Officers agree that this issue should be examined qualitatively in the Sustainability Statement, rather than in the ES.	Noted.

Topic	Scoping comment	EIA response
Hydrology and Flooding	Officers do not agree with the magnitude or scale of effect that has been identified for impacts on potable water supply, although to some extent this will be dependent on the levels of water efficiency being utilised for the development. A Resources Management Plan and as such high levels of water efficiency in new development is required in order to ensure the long term sustainability and availability of water supply. The ES should investigate potable water supply and the impact of the inevitable increased discharge of treated sewage effluent upon the recipient watercourse in terms of quality and quantity, and the current legal consent constraints relating to the sewage treatment works.	These aspects have been considered within the ES.
	New developments should take economic advantage of water efficiency technologies and the EA's Water Demand Management Team can provide information and advice on any aspect of water conservation. Widespread use of these and other technologies that ensure efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area and should therefore be covered in the ES.	Water efficiency measures will be integrated into the detailed design stage.
	The ES should consider all potential pollution issues both during construction; i.e. bunding of fuel tanks, wheel wash, storage of construction materials etc., and post development including trapped road gullies, oil interception facilities etc., and demonstrate a strategy to minimise the risk of pollution to the water environment. You are advised to contact the EA to discuss local Active Radioactive Substance Authorisations (RSA) and / Pollution Prevention & Control Authorisations (PPC) authorisations.	These aspects have been considered within the assessment work.
	Should a sustainable drainage system form part of the drainage system for this development, the County Council will need to be consulted if the intention is that the County Council will be the adopting and/or	Sustainable drainage will be used within the development and relevant consultation will be carried out at the appropriate stage.

Topic	Scoping comment	EIA response
	maintenance authority.	
	Due to the number of watercourses on site it would also be an important part of further scoping to gather more information on the catchments for these watercourses and the interaction between these. Officers recommend that care and detail is taken over how the site presently drains, so that this is used as the baseline for the proposed development	Drainage patterns across the site have been investigated and taken account of within the assessment work.
Unexploded Ordnance	It should be noted that schedule 4 of the EIA regulations does not expressively use the terms 'safety' or 'risk', but clearly does require a description of the main characteristics of the production processes, including the nature and quantity of substances. Schedule 3, dealing with screening criteria, refers to 'the risk of accidents, having regard in particular to the substances or technologies used'. Therefore the risk of accidents or explosive risks and the possible direct and indirect effects / impacts including evacuation potential, together with proposed preventive and remedial measures, should be covered in the ES.	Zetica has produced a SiteSafe UXO Risk Mitigation Plan for the whole of the Northstowe development. Several potential sources of UXO hazard have been considered and there is the potential for ordnance to range in size from small arms ammunitions to large unexploded bombs (UXBs). Zetica's study suggested that any anticipated hazards are likely to be at shallow depth, resulting from munitions disposal during World War II and post war training. -Whilst the majority of the site is considered to be a low hazard level, there are specific areas which are given a moderate or a high hazard level rating. Zetica's UXO Risk Mitigation Plan is included in Appendix D of the Hyder Interpretative Report (Appendix G1 of ES).

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Rowena Ekermawi
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Dear Rowena,

RE: Town and Country Planning (Environmental Impact Assessment) Regulations 2011: Proposed residential development at land between Longstanton and the Cambirdgeshire Guided Busway, Including the former Oakington Barracks site and Surrounding (but not including) Rampton Drift.

Further to the EIA Scoping Report submitted with your letter of 6th March 2014. This letter and appendices form the Council's Scoping Opinion in respect of the proposed development.

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 weeks. Appendix 2 details the list of consultees and Appendix 3 includes all of the consultee responses. For your information all personal details have been redacted. Should officers provide additional commentary after the date of this letter it will be forwarded to you for your information.

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 request should it need to do so.

To prevent duplication of documentation the Environmental Impact Assessment could incorporate the Health Impact Assessment, in accordance with the Council's LDF Health Impact Assessment SPD. Should you wish to avail yourself of this preferred approach it should be addressed in the EIA Scoping Report and will help to ensure that the HIA is wide ranging and comprehensive.

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

Yours sincerely

E. J. Green

Jane Green
Head of New Communities – Planning and New Communities

Appendix 1: Summary of issues to be addressed
Appendix 2: List of consultees
Appendix 3: Consultee responses

Appendix 1: Summary of issues to be addressed

Introduction:

Thank you for your scoping report of 6th March 2014, which relates to the following proposed development, comprising:

Planning Application 1

- 3300 dwellings with appropriate, services, facilities and infrastructure
- Two Primary Schools
- One Secondary School
- A Town Centre
- Employment adjacent to the town centre
- Formal and Informal Recreational Space and Landscaped Areas
- The Eastern and Western Sports Hub
- Up to three primary roads to link the development to the southern access and the busway running to the south of the site
- Engineering and Infrastructure Works

Planning Application 2

- Full Planning Application for southern Access Road (West) and junction adjacent to the development area including landscaping and drainage

Planning Application 3

- Full Planning Application for the Southern Access Road (East) to link to the Dry Drayton Road including landscaping and drainage.

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 the Environmental Impact Assessment (EIA) that will be detailed in your Environmental Statement (ES). For ease of reference the comments below will refer to the preparation of the ES, though obviously they include the EIA that will underpin it. You should also refer to the responses that are contained in Appendix 3, which may contain more detail about each topic area.

Please confirm the maximum number of dwellings proposed since discussions have centred on the demographs and impacts consequent on 3,500 dwellings and not 3,300 indicated in the scoping report of 6th March 2014.

Stage 1: Cumulative Impacts and Effects

A number of the consultees have made comments that relate to specific sections of Table These comments have been included as appropriate in the sections relating to the relevant chapters of the ES.

Whether significant cumulative effects are, or are not, likely to arise from a particular development will vary from topic to topic. 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 form 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 modelling of the 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
- Socio economic considerations

The authority considers the general approach to the identification, prediction and significance of effects to be sound. It is considered however that the ES should make references to the endorsed Development Framework Document and the Adopted Northstowe Area Action Plan where appropriate, including the DFD Addendum – An Addendum for Sustainable Living.

Comments have been raised with regards the cumulative effects. Given that the proposed development will form the second phase of Northstowe, the first phase of which has received outline consent, these comments impact upon the proposed baselines, especially in relation to noise and air quality matters. It is the view of the authority that the phase 1 consented development should be assessed as part of the future baseline. Any changes to phase 1 consented development at a later stage would be subject to a screening opinion and potentially a revised ES where any changes considered are potentially significant.

Whilst the scale of the development may not necessitate detailed consideration of local climatic effects, the creation of, heat islands, windy areas, wind tunnel effects and the impact of wind on unprotected open areas, should be included in the ES. Furthermore climate does need to be considered in the Sustainability Statement in terms of standards of construction (i.e. Code for Sustainable Homes and BREEAM) that will be achieved in order to minimise carbon emissions and maximise resource efficiency. Given what is now being achieved with the other Cambridge Fringe Sites and the approved first phase at Northstowe (Code Level 4) officers would expect that this is being targeted as a minimum. How the design of this new development responds to the effects of climate change, such as higher temperatures, water scarcity and extreme weather events such as flooding should also be a theme running through the chapters of the ES.

With regards to the cumulative impacts of development, the EIA regulations require consideration of both direct and indirect impacts on the proposed development relating to the environmental effects of those impacts. The developments and considerations listed below are expected to be included within the ES:

- Northstowe Phase 1 (S/0388/12/OL)
- A14 Cambridge to Huntingdon Improvement Scheme
- Home Farm, Longstanton (S/0682/95/O)

Officers are not aware of other major developments in the immediate vicinity that should be considered but if any traffic assessment requires additional inputs for cumulative impact consideration, such as the Cambridge northern fringe growth areas, then any noise and air quality assessment should reflect this.

Mitigation Measures

The ES should make the hierarchical approach to mitigation measures clear and seek to avoid and/ or design out impacts in the first instance. The ES should include climate change mitigation and adaptation and resilience; addressing both negative and positive impacts.

Air quality

The authority is generally satisfied with the approach and the proposed monitoring regarding air quality. The Scoping Report identifies air quality as one of the main effects to be considered (dust during construction and vehicle emissions during construction and post-completion). The HIA would address this also. Other non-vehicular sources of emissions should also be considered. The ES should also consider the impact of the introduction of new receptors close to the A14 and the B1050, both of which generate air pollution. The authority suggests that since the monitoring station at Bar Hill has now been decommissioned that this should be replaced by the Girton monitoring station for future validation requirements.

This is a major development that has the potential for significant traffic generation impacts in the wider area outside the immediate District, in particular the B1050 and the A14. The potential impact on the Cambridge City Council's Air Quality Management Area should be included in any Air Quality Assessment and detailed modelling. The ES or a separate application document will also be required to provide the Council with a Low Emissions Strategy which should consider all aspects of transport-related emission reductions encompassing the whole development.

Although the carbon dioxide budget/emissions being covered in the Sustainability Strategy is supported, given the AAP requirements in relation to renewable energy provision, it is necessary that the emissions from biomass boilers and other renewable energy technologies, and any negative impact upon air quality they may have, are included in the ES. As noted in the Scoping Report, the ES may need to be revisited depending on the renewable energy strategy to be employed. It would therefore make sense for the scope of the ES to be as broad as possible in order to include potential renewable energy technologies that may be proposed. We note that substantial work has been commenced on this already.

Further details of the requirements to assess the impacts upon air quality and the relevant guidance are provided in the Environmental Health response in Appendix 3.

Community, social and economic effects

Although the preferred option is for the applicant to produce a combined HIA and ES, the submission of the HIA as a separate document is acceptable. However, there will need to be clear cross-referencing between the two documents and you should avoid the duplication of information where possible. It is requested that you agree the HIA scoping with Iain Green prior to submission. In preparing this chapter the relevant Joint Strategic Needs Assessment should be used. Details can be found at the following link (htp://cambridgeshireinsight.org/jsna/).

The data used for the existing settlements needs to be set in context and to be qualified. The ES should clearly identify the source and validity of the data used. There is concern about the inclusion of limited consultees. Consideration of arts, museums and libraries should form part of the development assessment of the site, including reference to the County Council service level policy for library provision and aspirations for community hubs.

Officers suggest that Rampton Drift should be identified separately as an area of existing residents which might be adversely or beneficially affected by Phase 2 and therefore should be classed as a separate geographic area for study and inclusion within the ES and the Health Impact Assessment (HIA). The assessment needs to build confidence that all the assessments are up to date and are using data updated since the surveys undertaken for the previous planning application, approximately 8 years ago. The methodology needs to make it clear which assessments need updating and which need to be started again and the rationale for each decision will need to be given. The agreement of the relevant professional officer must be obtained to ensure surveys and data form an appropriate base for the assessment of the planning applications.

Spatial planning and development has the potential to impact on human health and wellbeing. This is because a wide range of social and environmental factors affects the health of local communities within South Cambridgeshire. These are known as the "Wider Determinants of Health" and include:

- Individual lifestyle factors such as smoking habits, diet and physical activity.
- Interactions with friends, relatives and mutual support within a community.
- Wider influences on health including - living and working conditions (air quality and noise), unemployment, water and sanitation, health care service, housing, food supplies, education, and the work environment.

Ensuring these issues are considered at the planning and design stage can improve outcomes for both the physical and mental health of the population. These can encourage environments which increase people's sense of safety and wellbeing, their opportunities for social interaction and community connectivity, improve air quality and water conservation and promote active travel and physical activity.

It is important to consider the effects of the wider determinants of health not only on the physical environment (e.g. air pollution, noise, traffic generation / patterns, housing stock) but also the social environment, which refers broadly to the social norms and values shared by members of social groups, as well as the quality, content, and volume of interpersonal interactions within urban and rural and between urban and rural communities. It is also known that these wider determinants are not distributed equally among populations (e.g. those people living in areas of deprivation tend to have poorer health outcomes). Considering these effects and their distribution at an early stage can enhance the potential to influence health and wellbeing, and health inequalities holistically. Reference should be made to the Council's Local Development Framework in relation to Health Impact Assessments, especially, Policy DP/1 Sustainable Development and the Health Impact Assessment SPD.

The list of stakeholders referred to in paragraph 64 and 76 should be updated and/or needs to be expanded e.g. the Primary Care Trust have not existed since April 2013, and has been replaced by the following:

- Cambridgeshire and Peterborough Clinical Commissioning Group
- CATCH – the local Clinical Commissioning Group
- NHS Property Services
- Public Health which is part of Cambridgeshire County Council, and
- NHS England
- Cambridgeshire Travel for Work Partnership

A plan showing distances from open space and sports provision to residential locations should also be provided in order to assess any links between car dependency and vehicle emissions and easy access to recreation. The amenity value and use of the cycle ways may be affected post construction and an assessment should be included with the ES and HIA.

Archaeology & Cultural heritage

The site is located in a landscape of high archaeological potential and as such the baseline study should include any new archaeological investigation undertaken since the previously submitted planning application for Phase 1 of Northstowe. The information can be found by consulting the County Historical Environment Record. The baseline should also acknowledge the progress of the phase 1 archaeological works which are likely to provide an enhanced understanding of archaeological patterns and may be directly linked to phase 2 development.

Officers recommend that the impact of the development on the historic environment should be considered as part of an ES for the site. The assessment should include non-intrusive (geophysical survey, field walking) and intrusive (trial trenching) techniques in those parts of the site which have not been assessed, in agreement with Cambridgeshire County Council's Heritage Service. The ES should include the results of these surveys and consider methodologies to mitigate the impact of the development on archaeological assets. This might include excavation in advance of development, assessment and publication of the results, or might include preservation in situ where this is merited by the significance of the assets.

The layout of ditches may have some historic basis and this should form an additional area of study, as well as to inform the necessary retention and continuity of important drainage watercourses to avoid flooding on and beyond the site. Moreover, officers would expect the consideration of historic assets to be of the specific characteristics of each asset; and the

observations to be updated by those actual findings, rather than to be based on a predicted matrix. It is unlikely that a watching brief would be an acceptable form of mitigation on this site and investigation is likely to be required in advance of construction but prior communication with the County Council's Heritage Officer is required in order to agree what is acceptable. Outreach and education programmes should be considered as well as on site interpretation.

Geology, Hydrogeology and Soils

The site as a whole contains several areas which have the potential for contamination, including the area of the former Barracks. There is agreement that ground contamination has a potential significant effect and should be included in the ES. All contaminated land considerations should be assessed in accordance with best practice guidance nationally and locally including the South Cambridgeshire District Council's "District Design Guide: High Quality and Sustainable Development in South Cambridgeshire."

Landscape and Visual Effects

The European Landscape Convention places a duty on Local Planning Authorities to consider the impacts of landscape when exercising their functions. The ES should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. Natural England encourages the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2002. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England's Landscape Character Assessment for the area in and around Northstowe has been published and the proposed ES should include reference to this. The inclusion of and locations for photo montages and photographic images to support the ES and planning application has been agreed and key locations have been included within the Scoping Report. In a similar way to that mentioned in section 7, the mitigation measures need to be clearly hierarchical with prevention and avoidance as the first choice options.

From a landscape perspective, the important issues to address within the ES are:

- visual impact on views of the proposed development (including southern access roads) and how that will affect the setting of existing settlements;
- Direct landscape impact on the existing and valuable vegetation (for screening and ecology) on the site (trees and hedge belts). This may be an immediate impact through removal of vegetation to allow construction as well as latent impact through constructing too close to existing vegetation; and
- The impact of any noise mitigation measures e.g. noise barriers/bunding on landscape.

The development will generate some waste from demolished buildings, hard-standings, subsoil, stripped topsoil etc. There will be opportunities for retaining this on site and the ES should consider the impacts of this.

Artificial lighting has the potential to have a wider significant environmental impact on the amenity of future and existing residential premises. It is likely that floodlighting will be provided to the sporting / recreational areas and there will also be additional lighting along access roads, within car park areas, public areas and external building lighting. The effects of this lighting need to be considered in terms of obtrusive light spill / glare and sky glow and where significant effects are predicted, mitigation measures should be proposed and residual effects assessed. The impact of lighting may also be of a wider interest to other specialisms such as ecology, community safety and highways. An assessment should be undertaken that considers the baseline lighting conditions and the potential artificial lighting impacts during site preparation, construction and operation in relation to surrounding sensitive receptors

including local residents, the night time amenity including sky glow, sensitive landscape and ecological features, road users and pedestrians.

Whilst it is acknowledged that wind effects may not be significant at the lower levels, the nature of the landscape is particularly flat and therefore it is considered that reference should be paid to the impact of wind and opportunities to design out impacts at the early stages through appropriate orientation of buildings, landscaping, urban form, etc.

Ecology

Officers support the view presented in the Scoping Report that the proposed development will have a significant impact on the site's ecology and that appropriate surveys following IEEM standards are required to inform the ES.

With regards to further survey work a repeat reptile survey is required to account for potential changes following translocation of reptiles and considering their prevalence on the phase 1 application site.

Noise and vibration

The scoping report includes reference to the following potential noise/ vibration impacts:

- Construction noise and vibration from the Site received at nearby sensitive receptors;
- The change in road traffic noise as a result of the proposed development; and
- Noise from the proposed industrial / commercial premises and similar including fixed plant and potentially noisy activities.

Officers would welcome further detail in regards these potential impacts within the ES. It is generally accepted that the EIA directive and regulations should be interpreted widely, that is they have a wide scope and broad purpose. The impact of the development on the receiving environment is key and if the *"existence of the development"* itself includes or introduces noise sensitive receptors itself such as residential premises or schools, then any significant noise effects / impacts associated with the development on sensitive receptors intrinsically as a whole should be at the very least considered. All residential properties are sensitive receptors and include both existing occupants of residential properties in adjoining residential areas and future residents of the proposed Phase 1 and Phase 2 development.

In addition to the potential noise sources and activities detailed under construction, consideration should also be given to the location and siting of primary construction access junctions, haul roads / routes to and on the development site and or similar. These require careful consideration in terms of duration of use and impact on noise sensitive premises. Any cumulative impacts with Phase 1 should be included.

- road traffic noise from internal circulation on roads within the proposed development;
- changes in road traffic noise due to changes in traffic flow or composition on existing surrounding roads;

Subject to the level of information submitted within the outline planning application (or full planning applications in relation to the southern access roads) the impact of traffic noise from primary roads within phase 2 on future noise sensitive premises that form part of the development itself requires numerical noise modelling / contouring to various floor levels. This will assist in the determination of noise mitigation measures as appropriate to achieve acceptable living conditions in terms of internal and external residential noise levels.

It may not be possible to assess the potential impact of all industrial, commercial activities (i.e. noise and vibration from the proposed employment areas) and any recreational uses / open spaces on existing and proposed sensitive premises in detail and in particular any outdoor Multi Use Games Areas (MUGA) with perimeter fencing or similar 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) may not be known at this early stage. However, the ES should state the assumptions that it is based on, which should draw on known information in relation to other existing comparable facilities.

With regard to the location of any Local Area for Play (LAP), Local Equipped Area for Play (LEAP) or Neighbourhood Equipped Area for Play (NEAP) or similar due regard should be given to the minimum distance Buffer Zones (the space between the facility and the nearest residential property, which is required to minimise disturbance) as detailed in SCDC's Local Development Framework, Open Space in New Developments**,** Supplementary Planning Document, Adopted January 2009.

The study area proposed for existing surrounding receptors is acceptable. However as stated the location of any noise sensitive receptors on the development Phase 2 site itself, Phase 1 and proximity to noise sources / activities requires consideration and assessment. Assessment by comparison of future noise levels with existing baseline noise measurements is acceptable providing it is comprehensive and representative. However the final noise significance of impact assessment methodology / remit and actual updated / validation of baseline / background noise surveys including duration and monitoring locations should be fully agreed with SCDC's Health & Environmental Services in advance.

Particular regard should be given to incorporating the B1050 Longstanton western bypass, which was completed in 2008 and the CGB which commenced operation in August 2011 into the baseline survey data. In both cases they commenced operation after the undertaking of initial background baseline noise surveys at 23 receptors in 2003 and 2006.

Little information is provided on assessment significance criteria to be used. It should be noted that no single noise significance of impact assessment exists as different noise sources have different impact on health and quality of life and indeed may result in the occurrence of noise nuisances if not appropriately assessed etc.

The approach proposed for construction traffic impact assessment is also acceptable. However any assessment should also acknowledge the advice given in 5228: 2009 Part 1 section E.4 '*Example of criteria for the assessment of the significance of noise effects'* on construction noise trigger level exceedance for certain periods / duration and the possible offer of a scheme for the installation of noise insulation or the reasonable costs thereof, or a scheme to facilitate temporary rehousing of occupants, as appropriate.

In terms of construction impacts / effects the implementation of a construction environmental management plan to include a range of best practice measures to minimise the generation of noise is welcomed.

As there are numerous and interrelated noise and vibration effects and various national and local policies, standards and guidance it is recommended that a "Summary of Likely Significant Effects Table for Noise and Vibration" type table is provided to collate impacts / effects.

Traffic and transport

From a transport policy point of view the main issues are covered for what is required in the Scoping Report. The more technical transport and traffic movement impacts will need to be addressed in due course as part of the Transport Assessment (TA) that will be required to accompany any application. The detailed scope of this will need to be agreed with the County Council.

Waste

As a result of the development there will be significant demolition and construction, all of which will give rise to inert and construction waste. Although construction waste will be covered under the Site Waste Management Plan (SWMP) there will be "substantial amounts of waste" as a result of the development. It is therefore recommended that the impact of waste be considered by the ES. The likelihood of contamination on site from site preparation and construction processes remains to be assessed by the ES. The routing of vehicles removing waste from site will also need to be assessed under the appropriate section.

Policy CS28 requires a waste management strategy and audit to be put in place (in addition to a SWMP), which as a minimum will provide information on:

- anticipated nature and volumes of waste arising
- the steps that will be taken to minimise the amount of waste arising
- the steps that will be taken to ensure segregation of waste at source;
- and its sorting, storage, recovery and recycling
- steps taken to ensure the re-use of waste arising in the development e.g. soils and recycled aggregate any other steps taken to manage the waste cannot be incorporated within the development or that arises once the development is complete

The waste strategy and audit may sit outside the ES, but the information within it should inform the ES in terms of the nature and the impacts arising from the temporary inert waste recycling facility (capacity / duration / types and quantities of waste materials going through it etc.).

There needs to be a clear distinction between the construction phase and the operational phase. The baseline section of the Scoping Report relates only to the management of municipal waste, and not construction, demolition or excavation waste, which should also be included. Reference to the County Council's Minerals and Waste Core Strategy would be appropriate here as it addresses, for example, recycled aggregates (Policies CS7 / CS28).

When considering the operational phase, you should address the provision of new waste management facilities which will arise though the requirements of the adopted RECAP Waste Management Guide (February 2012). This requires the applicant to address the provision of bring sites / contributions to Household Recycling Centres through the completion of the RECAP Toolkit (which must be submitted with the planning application).

It is acknowledged that the proposed development will result in the generation of increased amounts of municipal and commercial waste post-construction. It is also requested that local data for recycling within South Cambridgeshire should be used as well as the county wide data. It is stated that, as the quantities involved are likely to be insignificant in relation to existing waste generation and management in South Cambridgeshire, it is proposed that municipal waste is not scoped into the EIA and will not be considered in the ES. Officers agree that this issue should be examined qualitatively in the Sustainability Statement, rather than in the ES.

The entire development needs coordinated long term waste and recycling arrangements and infrastructure that is workable from the outset. This should be considered quantitatively in a separate accompanying submission such as Sustainability Statement or dedicated waste strategy.

Hydrology and Flooding

Officers do not agree with the magnitude or scale of effect that has been identified for impacts on potable water supply, although to some extent this will be dependent on the levels of water efficiency being utilised for the development. A Resources Management Plan and as such high levels of water efficiency in new development is required in order to ensure the long term sustainability and availability of water supply. The ES should investigate potable water supply and the impact of the inevitable increased discharge of treated sewage effluent upon the recipient watercourse in terms of quality and quantity, and the current legal consent constraints relating to the sewage treatment works.

New developments should take economic advantage of water efficiency technologies and the EA's Water Demand Management Team can provide information and advice on any aspect of water conservation. Widespread use of these and other technologies that ensure efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area and should therefore be covered in the ES.

The ES should consider all potential pollution issues both during construction; i.e. bunding of fuel tanks, wheel wash, storage of construction materials etc., and post development including trapped road gullies, oil interception facilities etc., and demonstrate a strategy to minimise the risk of pollution to the water environment. You are advised to contact the EA to discuss local Active Radioactive Substance Authorisations (RSA) and / Pollution Prevention & Control Authorisations (PPC) authorisations. Further advice from the EA can be found in Appendix 3.

Should a sustainable drainage system form part of the drainage system for this development, the County Council will need to be consulted if the intention is that the County Council will be the adopting and/or maintenance authority. Officers agree that where there is good recharge to the ground water this should continue though SuDS techniques using the appropriate Management Train in accordance with The SuDs Manual (Ciria C697 or later versions) to minimise the risk of pollution, where practicable. Further information on the use of SuDs and consent for works to watercourses are included in the County Council's response in Appendix 3.

Due to the number of watercourses on site it would also be an important part of further scoping to gather more information on the catchments for these watercourses and the interaction between these. Officers recommend that care and detail is taken over how the site presently drains, so that this is used as the baseline for the proposed development. For example, if part of the site presently drains to a watercourse then that part of the site should continue to drain, at an agreed controlled rate offering betterment, to that relevant watercourse; compounded catchments are not recommended. Officers do not recommend these watercourses are culverted but become a feature of the site and are considered early on in the master planning. Long distances of culverting are not permitted by the County Council, as the consenting Authority. Small lengths of access crossings can be considered.

Other

Unexploded Ordnance:
The consideration of unexploded ordnance is limited and does not give full consideration to additional indirect impacts, cumulative impacts or mitigation as necessary associated with UXO. This matter was also a matter of concern and detailed consideration at the phase 1 outline application stages.

It is understood that the entire Northstowe site has been subject to previous UXO detailed desk top surveys and electromagnetic geophysical (high performance magnetometer surveys) site surveys undertaken by Bactec (Bomb Disposal Specialists). These surveys have identified numerous "high" risk UXO targets within an Explosive Ordnance Threat Assessment on both the South West corner of the Phase 1 application site, where it abuts Brookfield farm and on future Phases of land and in particular on the previous land used during World War II as an airbase.

It should be noted that certain high risk viable UXO targets were identified and subsequently cleared in 2007/08 by controlled explosion (RAF Bomb Disposal) which necessitated the implementation of evacuation zones ranging from 500m to 1.5km radius, the latter encompassing most of Longstanton, Rampton Drift and half of Oakington.

It is understood that the final intrusive investigations to identify the viability and actual risk of any of the identified high risk target have not been undertaken to date. It is therefore not

possible to confirm if controlled explosive clearance will be required that would result in the need to carry out further evacuation plans.

This introduces serious uncertainty and has important implications for any phasing plan for the Northstowe site. There may be repercussions in terms of health and safety concerns and inconvenience to existing and potentially new residents of Phase 1, 2 and future phases, should the evacuation of homes be necessary, depending on the nature of any UXO risk.

It should be noted that schedule 4 of the EIA regulations does not expressively use the terms 'safety' or 'risk', but clearly does require a description of the main characteristics of the production processes, including the nature and quantity of substances. Schedule 3, dealing with screening criteria, refers to *'the risk of accidents, having regard in particular to the substances or technologies used'.*

Therefore the risk of accidents or explosive risks and the possible direct and indirect effects / impacts including evacuation potential, together with proposed preventive and remedial measures, should be covered in the ES.

Conclusion

The above points, when read in conjunction with the scoping 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 contact the Northstowe Team or the relevant consultee directly for clarity or confirmation.

Appendix 2: List of consultees

Internal consultees
Iain Green (Environmental Health Officer - Public Health Specialist)
David Hamilton (Landscape Design Officer)
Greg Kearney (Environmental Health Officer - Planning Specialist)
Pat Matthews (Drainage Manager)
Rob Mungovan (Ecology Officer)
Ian Howes (Principal Urban Design Officer)
Clare Sproats (Scientific Officer – Contaminated Land)
Tam Parry (Principal Transport Officer)
Andy Thomas (Senior Archaeologist)
Kenny Abere, (Scientific Officer (Air Quality))
Helen Bord, (Scientific Officer, (Contaminated Land))

External consultees
Anglian Water
Cambridgeshire Constabulary
Cambridgeshire Fire and Rescue
English Heritage
Environment Agency
Highways Agency
Natural England
Cambridgeshire and Peterborough Clinical Commissioning Group
CATCH – the local Clinical Commissioning Group
NHS Property Services
Public Health which is part of Cambridgeshire County Council, and
NHS England
Cambridgeshire Travel for Work Partnership

A number of consultees responded saying they had no comment to make on the Scoping Report, or that they had read the comments from bodies that had already responded and that they had nothing else to add.

From: Hamilton David
Sent: 28 March 2014 16:04
To: Harvey Emily
Cc: Mungovan Rob
Subject: Northstowe Scoping

Hello Emily

Here are some Landscape Comments on the Northstowe Scoping Document

Arup Document

Northstowe Phase 2 Development

Environmental Impacr Assessment Scoping Report

March 6 2014

3.2 General EIA Methodology

Page 8

3.3.4 The Criteria used seem blunt – from 'Major' effects which are 'of concern to (viability of?) the project' and environmental resources which cannot be replaced, directly to 'Moderate effects which are 'not likely to be key decision making issues'

It probably needs an extra grade of effect between these two, as effects other than 'Major' will play their part in decisions to 'Maximise environmental and beneficial effects and take account of Landscape and Visual considerations'. (page 61)

3.3.6 Mitigation. Mitigation should sit in a series of measures to combat potential harm to environmental resources…

a) Prevention or Avoidance of harm

b) Reduction of Harm

c) Mitigation of Harm (fully or partial)

d) Compensation of Harm

e) Off-Setting of Harm.

5.10 Landscape and Visual Effects

Page 58

275 – The Nature of the Effect should also be stated here – Beneficial, Adverse or Neutral. Also the Magnitude of the change should be considered.

The type of effect should also be considered here – Direct, indirect, short, medium and long term, permanent or temporary etc.

279 – The Oak Parkland to the south is an important area which should be highlighted. It will be affected by the main application area to some extent, with potentially more significant impacts caused by the road applications.

Page 60

288 – Also include information from Landscape East

289 – Will ZTV's produced for 'Peak construction Time' and 'Year One' appear pretty similar? Especially if the build out is relatively short (4-5 years?)

Page 61

296 – As discussed above verified photomontages for 'Construction' and 'Year One' may be similar – Photomontages for 'year 5' or 'Year 10' should be considered.

298 and 299 - Support the objectives to let landscape and mitigation to influence the Layout, height and density of buildings and to 'Maximise environmental and beneficial effects and take account of Landscape and Visual considerations'.

The type of effect should also be considered here – Direct, indirect, short, medium and long term, permanent or temporary etc.

5.11.2 Wind effects

Page 63

302 – The document states that as the buildings are only to be between 2 and 6 stories, and significant wind effects are usually only associated with buildings of 10-12 stories upwards, Wind Effects are therefore regarded as 'insignificant'.

Further work will be required here – it is proposed that the layout of the building grain is to respect the 'Runway Heritage' of the site, facing the prevailing wind. The site is open and flat. Wind Effects could have significant impacts on the micro climates and amenity of Northstowe.

David

David Hamilton BA Dip LA (hons) | Landscape Design Officer

South Cambridgeshire District Council

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South Cambridgeshire District Council

Internal Memo

To:	**Emily Harvey** **Principal Planning Officer**	**Dept:**	**Northstowe Principal Planner** **Northstowe Joint Projects Team** **Major Developments** **Planning & New Communities**
From:	**Greg Kearney** **Environmental** **Health Officer**	**Dept:**	**Health & Environmental Services**
Phone:	**X3145**		
Date:	**25th March 2014**		
Subject:	**Northstowe Phase 2 - Environmental Impact Assessment Scoping Report / Opinion Request** **Phase 2 of the Northstowe Development on land to the East of Longstanton, Cambridgeshire in the parishes of Longstanton and Oakington.** **Town and Country Planning (Environmental Impact Assessment) Regulations 2011 request for an EIA Scoping Opinion under Regulation 13**		
Our Ref:	**Job No: WK240198**		
Your Ref	**Northstowe Phase 2 - Environmental Scoping Report**		

We refer to the ARUP *"Northstowe Phase 2 Development, Environmental Impact Assessment Scoping Report, Issue 6 March 2014"* prepared on behalf of the Homes and Communities Agency with the applicant's covering letter which has been submitted for consideration.

The proposals are considered "EIA Development" under the EIA regulations and the submitted Scoping Report sets out the framework within which an Environmental Statement (ES) will be produced, the topic areas (including assessment methodologies to be used) and information that will be contained within the document.

It is understood the Phase 2 of the proposed Northstowe town development will comprise a minimum of three separate planning applications as follows:

Planning Application 1 - An outline planning application for Northstowe Phase 2 covering a total of approximately 162 hectares and comprising:

- Residential – approximately 3,300 dwellings;
- The town centres, including shops, dwellings and community facilities;
- Two Primary Schools;
- A Secondary School;
- Employment adjacent to the town centre;
- Formal and informal recreation space;
- Landscaped areas;
- Eastern sports hub;
- The remainder of the of the western sports hub (to complete the provision delivered at Phase 1);
- Up to three primary roads to link to the southern access and the busway running to the south of the site;
- Engineering and infrastructure works.

Planning Application 2 - a full planning application for the Southern Access Road (West) and the associated junction adjacent to the development area including landscaping and drainage;

Planning Application 3 - a full planning application for the Southern Access Road (East) to link to the Dry Drayton Road, including landscaping and drainage.

Summary

The purposes of the EIA Regulations is to ensure that the environmental effects of a proposed development are fully considered (together with the economic and social benefits of the development), as part of the decision making process before the planning permission is determined.

Officers with various remits / responsibilities within Health and Environmental Services have reviewed the ARUP scoping report and we have made detailed comments on the scope and impact assessment approach / methodology proposed for the following topics chapters to be included in the ES:

- **General Comments on proposed ARUP EIA Scoping Report Approach**
- **Approach to EIA including Cumulative Effects Assessment**
- **Noise and Vibration Health Impact Assessment (HIA) / Socio-Economic Issues:**
- **Air Quality (AQ)**
- **Hydrology and Flooding**
- **Geology, Hydrogeology and Soils**
- **Health Impact Assessment (HIA) / Socio-Economic Issues**

However for the reasons detailed unless otherwise fully justified, additional chapters / sections should be provided on the following topics:

- **Artificial Lighting Impact**
- **Waste Generation and Management / Waste and Recycling**
- **Risk of Unexploded Ordnance and Impacts**

General Comments on proposed ARUP EIA Scoping Report Approach

Northsowe as part of SCDC's Core Strategy

It is understood that in terms of overall SCDC strategic planning policy, plans and programmes, Northstowe is a proposed new town, north of Cambridge specifically relating to Objective ST/d of SCDC's Core Strategy (adopted January 2007), which is to:

'To create a sustainable small new town close to but separate from the villages of Longstanton and Oakington connected to Cambridge by a high quality rapid transit system along the route of the disused St Ives railway. The new town will make best use of previously developed land.'

The Core Strategy also states that Northstowe will consist of up to 10,000 new homes with a town centre to serve the town and nearby villages. In addition, it will be a site for new employment, allowing for continuing growth in the high technology research and development sector.

There are many references to Northstowe throughout various policies in the Core Strategy and a Northstowe Area Action Plan was formally adopted in July 2007. The AAP makes it clear that Northstowe will need to be in accordance with the government's national strategy that has sustainability as its cornerstone, which are social, environmental, economic sustainability and the prudent use of natural resources in its widest meaning.

Although not earmarked as one of the government's new eco-towns, it was announced that Northsowe would be an exemplar of sustainability in the use of renewable energy sources, the minimisation of carbon emissions and the implementation of environmental best practice on waste and water management.

It is therefore surprising that there is no reference at all to the Northstowe Area Action Plan and the *'Northstowe Development Framework Document, August 2012 (DFD)'* which was endorsed by Northstowe Joint Development Control Committee on the 20th July 2012 during the consideration of Phase 1 outline planning approval.

The DFD confirms that Northstowe is promoted jointly by Gallagher and the Homes and Communities Agency (HCA) and it is understood that the DFD is a joint document. A separate *'Phasing and delivery strategy, October 2012'* DFD addendum contains information about the phasing of Northstowe beyond Phase 1 and there is an addendum tilted '*An exemplar of sustainable living'.*

It should be noted that these documents contain commitments relevant to the future phase Environmental Impact Assessments. For example in the '*DFD Addendum - Phasing and delivery strategy',* under Environmental assessment it is stated that:

"A detailed environmental assessment will be undertaken to support the outline planning applications submitted for each phase of development. The Phase 2 assessment will take into consideration the impacts and mitigation associated with Phase 1 and the qualitative cumulative impacts of later phases of Northstowe. The principle of benchmarking the impacts of earlier phases and taking these fully into consideration will be adopted for the preparation of environmental impact assessments for each future phase of development."

In the '*DFD Addendum* - ***An exemplar of sustainable living 'Phasing and delivery strategy',*** under Environmental it is stated that***:***

"The development of a low emission strategy (LES) relating primarily to a package of measures to help mitigate transport impact on local air quality and public health that applies both through the construction and occupation stages together with air quality monitoring in and around the development. Promote technology and / or infrastructure to mitigate impacts on local air quality, reduce carbon emissions by encouraging lowemission / non-fossil fuelled transport and promote a modal shift away from car travel. The LES would complement other

design and mitigation options such as travel planning and provision of public transport infrastructure".

The DFD and associated documents should be fully referenced as relevant material planning considerations in relevant topic chapters / sections and used to inform the ES as appropriate.

How do or will the proposals actually accord with the endorsed DFD and associated documents etc?

3 Approach to EIA

3.2 General EIA Methodology

Para 28: details the likely key environmental issues that the EIA will consider.

The last bullet point refers to *'noise and air quality 'nuisance' effects, particularly resulting from the construction phase'.*

It is our view that it is not just noise and air quality 'nuisance' effects that require consideration.

Nuisance is a legal construct with various types / levels of nuisance subject to various legal interpretations / understanding and definitions. There is an uncertain line between what is considered a tolerable annoyance and actionable nuisance.

Nuisance is not an appropriate standard of protection under planning. For example for statutory nuisances, the test is not fixed but relies upon consideration of a range of factors including the character of the locality. Nuisance does not equate to loss of amenity. Significant loss of amenity will often occur at lower levels of emission than would constitute a statutory nuisance. It is therefore important to consider properly, loss of amenity from emissions in the planning process in its wider context and not just from the narrow perspective of statutory nuisance.

For noise impacts, in accordance with the NPPF the aim is to avoid noise from giving rise to significant adverse impact on health and quality of life (amenity) as a result of new development both during construction and operation.

In general, the effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be considered and taken into account.

3.3.1 Spatial and temporal scope

Para. 32: In accordance with EIA regulations, in terms of temporal scope some consideration should be given to and agreement should be reached on what is to be considered short, medium and long term effects timescales.

This is particularly important in terms of agreeing assessment baselines and assessing against / comparing with future year impacts / effects? It is often common practice to compare a baseline year with future predicted year or years 'with' and 'without' development?

It is paramount that this is agreed as this is core to undertaking an acceptable impact assessment.

However it is noted that section *5.3 Traffic and Transport* states that the traffic assessment will be undertaken consistent with the future assessment years for the CSRM, which will have a model year of 2031 and various assessment scenarios are proposed. The assessment scenarios appear acceptable in principle but the noise and air quality assessments which are informed by the traffic modelling should assess the impact of Northstowe as whole that is all phases built out.

Para. 34: states that *'should planning permission be granted, construction of Northstowe Phase 2 is unlikely to commence before 2017. In this respect, the EIA will need to consider how the baseline environmental conditions identified by 2014 data may change up to 2017, when predicted effects are likely to commence'.*

The exact meaning of this paragraph is unclear and agreement on what baselines should be used should be clarified with applicant / agent and agreed. It is also linked to spatial and temporal scope above.

This matter is paramount. As stated the baselines will influence the final outcomes of the significance of impacts assessment for certain topics such as air quality and noise and is linked to the concept of short, medium and long term effects mentioned with regard to paragraph 32 above.

In the spirit of cumulative impact assessment for Northstowe impacts as a whole and to comply with the EIA regulations, it is our view that for air quality and noise impact assessments, the baseline to be used should not be influenced by or include any development that falls within the definition of Northstowe. Therefore any air quality and noise baselines should not be adjusted for any future baseline changes associated with or attributable to Gallagher's Phase 1 development that may occur prior to commencement of Phase 2. The baselines to be used should be without any of Northstowe development at all.

This matter is also related to cumulative effects / impacts which is discussed in more detail below.

3.3.5 Cumulative effects

It is proposed that the following developments will be considered within the cumulative assessment, where relevant:

- Phase 1 Northstowe; and
- A14 Cambridge to Huntingdon improvement scheme.

In terms of air quality and noise impact assessment and possibly traffic (County to confirm) we do not agree with this limited approach.

The whole concept of and approach to the cumulative impact assessment of Northstowe as a whole has been subject to previous detailed debate / discussions at the Phase 1 application stage and during consideration of the Northstowe DFD.

As stated previously it has always been our position that any development phase EIA and certainly for Phase 2 and any subsequent future phases (3, 4 and beyond as detailed in the DFD), should be considered collectively and cumulatively and reported in the ES.

It is also not clear if the cumulative impacts will include consideration of approved application S/0682/95/O and various related phased reserved matters applications (partially completed) for development of Home Farm to the North West of Longstanton which includes up to approximately 500 residential units.

Cumulative impact is particularly relevant to potential operational air quality and noise significant impacts.

A genuine cumulative impact assessment should be undertaken for Northstowe as a whole and it remains our view that failure to do so would be not in accordance with EIA Regulations and there is risk of possible successful judicial review on the grounds of deficient cumulative impacts, if pursued.

This is particularly important for Phase 2 and beyond as it is understood that the HCA will be the promoter and applicant for all future remaining phases.

The environmental effects of the Northstowe need to be adequately assessed as a whole development project in accordance with the EIA Regulations and not in a piecemeal manner.

The EIA Directive requires consideration of the direct impacts and of any indirect, secondary and cumulative effects of a project or in combination with other reasonably foreseeable projects. It also requires consideration of the interactions between the environmental effects listed. For example the noise and air quality assessment will rely on robust traffic assessments and predicted changes in traffic flows, volume and vehicle composition.

Such a piecemeal 'wait and see' approach as proposed is in our view unacceptable. It is not coordinated or integrated and has the potential to underestimate the magnitude of likely significant environmental effects. This is likely to result in development that is fragmentary and unsystematic. The effects of the proposals detailed will have a degree of environmental effect / impact but as a whole such impacts may be greater and the interactions more complex.

There is a danger that this may result in development whose effects have not been effectively anticipated at an early stage and is poor in terms of overall physical quality design and layout and long-term social, environmental and economic sustainability objectives and goals. There may also be considerable unforeseen build-out and operational problems that may be difficult to resolve retrospectively for SCDC.

Avoiding and or mitigating measures to minimize or remedy adverse effects and enhancing any beneficial effects of any development as a whole is paramount. Such measures are an integral part of the initial design process and subsequent phases provide invaluable opportunities to intrinsically 'design out' effects e.g.

- appropriate integrated highway, drainage and waste / recycling infrastructure
- traffic, air and noise assessments that are robust with mitigation as necessary
- adequate health and community facilities
- an overall workable masterplan in all respects

It is acknowledged that some the environmental effects of Northstowe as a whole may not be identifiable or difficult to quantify from the outset. However it would be preferable to assess those that can be established as a whole and then take a multi-staged reserved matter approach that requires a iterative ES process as necessary in a coordinated manner.

Exactly which developments should be considered within or as part of any the cumulative assessment should be agreed in advance with the LPA.

3.3.6 Mitigation measures

There is only reference to measures to reduce any adverse effects to acceptable levels. Reduction is only one form of remedy available. In accordance with EIA regs the aim is consider / describe

measures envisaged to **prevent, reduce and where possible offset / remedy** significant adverse effects. The designing out of any adverse effects should be considered first in any hierarchy of adverse impact remedial measures.

Again failure to consider cumulative effect with all phases would in our view be deficient and may result in inadequate consideration and implementation of mitigation measures and poorer quality development.

3.3.7 Residual effects

Again in accordance with EIA Regs an estimate by type and quantity of expected residues and emissions should be provided.

5.4 Noise and Vibration

The following comments have been provided by Greg Kearney, Environmental Health Officer, Health & Environmental Services:

General Comments on Noise and Vibration Assessment Approach

It is stated that an assessment of potential noise and vibration related impacts affecting the surrounding area during both the construction and operational phases of the proposed development will be undertaken and will include consideration of the following potential impacts:

- Construction noise and vibration from the Site received at nearby sensitive receptors;
- The change in road traffic noise as a result of the proposed development; and
- Noise from the proposed industrial / commercial premises and similar including fixed plant and potentially noisy activities.

This is noted but the identified scope of the likely significant noise effects as detailed are in our view limited in scope or are not fully explained in the scoping report.

In particular, there does not appear to be any proposed assessment of the suitability of the site for residential development in terms of the impact of existing noise sources such as the Cambridge Guided Bus way (CGB) traffic noise on the health and quality of life (amenity) of future residents including the use of any country parks or public open spaces and noise mitigation measures that may be required.

It may be the view that that these issues are principally related to design and the suitability of the proposals in terms of land use planning and are therefore should not considered be EIA issues (EIA deals with the effects of the proposal on the environment, and not the effects of the environment on the proposal?).

Whilst there is a degree of land use planning, that is the effects of the environment on the proposal and suitability for housing, we disagree with this approach and it is generally accepted that the EIA directive and regulations should be interpreted widely, that is they have a wide scope and broad purpose.

The impact of the development on the receiving environment is key and if the *"existence of the development"* itself includes or introduces noise sensitive receptors itself such as residential premises or schools, then any significant noise effects / impacts associated with the development on sensitive receptors intrinsically as a whole should be at the very least considered.

All residential properties are sensitive receptors and include both existing occupants of residential properties in adjoining residential areas and **future residents of the proposed Phase 2 development**.

Noise from existing noise sources such as the CGB on the proposed dwellings may well be considered land use planning issues but it is our view that to comply with the EIA regulations, these receptors require noise and vibration assessment and in any case it would be sensible to include under one chapter.

Our comments regarding cumulative impacts above are also relevant.

5.4.3 Key Issues

For all construction and operational noise and vibration it is paramount that **in addition to any impacts / effects on existing noise sensitive premises the impact on future premises of Phase 1 and Phase 2 development should be considered**.

Paragraph 115:

- **construction of the proposed development and infrastructure**

In addition to the potential noise sources and activities detailed under construction, consideration should also be given to the location and siting of primary construction access junctions, haul roads / routes to and on the development site and or similar. These require careful consideration in terms of duration of use and impact on noise sensitive premises. Any cumulative impacts with Phase 1 should be included.

- **road traffic noise from internal circulation on roads within the proposed development;**
- **changes in road traffic noise due to changes in traffic flow or composition on existing surrounding roads;**

The impact on existing and future residents of Phase 1 including the various stages of the Phase 2 development itself as appropriate should be considered. The phasing plans for phase 1 and 2 also require careful consideration and coordination to minimise noise impacts.

The effects of noise as a result of development generated traffic on existing residential, together with the proposed junction providing access to the Site, should be assessed in general accordance with the principles of the Design Manual for Roads and Bridges (DMRB).

The impact of traffic noise from primary internal roads within phase 2 on future noise sensitive premises that form part of the development itself requires numerical noise modelling / contouring to various floor levels. This will assist in the determination of noise mitigation measures as appropriate to achieve acceptable living conditions in terms of internal and external residential noise levels. Regard shall be given to the recommended internal and external noise levels in *BS 8233: 2014- Guidance on sound insulation and noise reduction for building.*

Due regard should be given to the '*Northstowe Development Framework Document Addendum Phasing and delivery strategy October 2012'* which was endorsed by Northstowe Joint Development Control Committee on the 4th October 2012. Again any cumulative impacts with Phase 1 should be included.

- **plant machinery noise associated with commercial and residential buildings, offices, leisure facilities; and**
- **loading/unloading associated with delivery vehicles**

Noise impacts / effects at the operational stages of the development and affecting both existing and proposed noise sensitive development and in particular residential, should include as follows:

- 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 including leisure / recreational on the site including deliveries, car parking etc as detailed

- Impacts associated with the specific road improvement works during construction
- Impacts associated with the specific road improvement works during operation

Where residential properties share a party wall or floor with retail / commercial properties, the dividing/separating partitions or structures will need to provide sufficient attenuation for the intended uses of the commercial properties, to provide the required internal noise levels to the residential properties. However, further detailed design information will be required for approval.

It is also possible that the Community uses may also hold events such as the hiring of hall / rooms for music events such as exercise class and celebratory events such as birthdays and anniversaries. Such uses should be of suitable construction to minimise impact and noise breakout having regard to ventilation requirements but it is noted that such events may require a premises license under the Licensing Act 2003. The possible the noise sources / issues associated with any community use aspect including the school may require further consideration. Particular regard should be given to community rooms for recreational and entertainment uses such as exercise classes and or private hire for celebrations / parties and amplified music. To control the noise from the community uses mitigation measures / noise insulation scheme are likely to be required which may have an impact on design such as acoustic door lobbies and special glazing design specification. It should also be noted that the proposed natural stack ventilation design may be inappropriate for the community hall / rooms. The use of any external community area may also require restriction.

It is likely that fixed plant and equipment can be designed, attenuated and operated to have a negligible impact on existing and proposed premises within environmental noise criterion, agreed with the LPA.

It may not be possible to assess the potential impact of all industrial, commercial activities (i.e. noise and vibration from the proposed employment areas) and any recreational uses / open spaces on existing and proposed sensitive premises in detail and in particular any outdoor Multi Use Games Areas (MUGA) with perimeter fencing or similar 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) may not be known at this early stage.

With regard to the location of any Local Area for Play (LAP), Local Equipped Area for Play (LEAP) or Neighbourhood Equipped Area for Play (NEAP) or similar due regard should be given to the minimum distance Buffer Zones (the space between the facility and the nearest residential property, which is required to minimise disturbance) as detailed in SCDC's Local Development Framework, Open Space in New Developments**,** Supplementary Planning Document, Adopted January 2009.

However, the ES should specify environmental noise emission limits criteria and vibration standards that must be achieved to minimise any potential impact from industrial and/or commercial activities including mitigation measure consideration.

Additional considerations

Acoustic Environment and Proposed Schools or other educational Premises

In terms of the influence of existing or future ambient environmental noise on the suitability of the site for any proposed schools or other educational uses the proposals will need to meet the minimum acoustic standards for schools as set out in section E4 of Building Regulations AD- E, Resistance to the passage of sound, that is compliance with Building Bulletin 93 (BB93) - Acoustic Design of Schools.

BB93 also gives the following guidance on outdoor areas:

- Noise levels in outdoor areas (unoccupied) should not exceed 55dB LAeq, 30min
- There should be at least one area used for outdoor teaching at a level below 55dB LAeq, 30min
- 60 dB LAeq, 30min should be regarded as the upper limit for new schools at the boundary of external premises used for formal and informal teaching.

In addition and if applicable there may a requirement to comply with the Department for Education publication *"Acoustic Performance Standards for the Priority Schools Building Programme, September 2012"*.

It appears that these design requirements will be met in accordance with BB 93 and these will require building control approval. However the ES should consider and acknowledge that this is a potential significant effect.

5.4.4 Scope of Assessment

119. The noise and vibration assessment will be undertaken with reference to the following standards and guidance: Assessment Methodology

This section details the relevant government / industry assessment methodologies, standards and best practice guidance documents that will be considered / used in undertaking the various noise and vibration assessments for the construction and operational stages of the development

The methodologies etc detailed are generally comprehensive and acceptable.

However please see comments above regarding suitability of site for residential and the noise impacts of any proposed industrial / commercial noise affecting noise sensitive premises that form part of the development itself.

Any noise significance of impact assessment may also require assessment against the Institute of Environmental Management Assessment (IEMA)/Institute of Acoustics (IOA) Working Party Consultation *Draft Guidelines for Noise Impact Assessment* (IEMA/IOA, 2002).

The acoustic consultant should already be aware but for clarity, it is noted that that '*BS 8233:1999- Sound insulation and noise reduction for buildings, Code of practice'* referred to was revised / withdrawn and replaced in February 2014 by '*BS 8233: 2014- Guidance on sound insulation and noise reduction for building'.* This current BS 8233 should be used.

In addition the following should also be referenced and considered:

South Cambridgeshire District Council's Supplementary Planning Document - "District Design Guide: High Quality and Sustainable Development in South Cambridgeshire", Adopted March 2010: Chapter 10 - Environmental Health & in particular Appendix 6: Noise" downloadable from:

http://www.scambs.gov.uk/sites/www.scambs.gov.uk/files/documents/Adopted%20Design%20Guide%20SPD%20FINAL%20%28Appendices%29.pdf

- Institute of Acoustics / Institute of Environmental Management and Assessment 'Guidelines on Noise Impact Assessment'
- BS 7445: 2003 Part 1 'Description and measurement of environmental noise'.
- 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
- The Building Regulations 2000. 'The Building Regulations. Resistance to the passage of sound'. Approved Document E.
- Department for Education and Science, '*Building Bulletin* (BB) *93'*.

5.4.5 Study area

5.4.6 Assessment Methodology

The study area proposed for existing surrounding receptors is acceptable. However as stated the location of any noise sensitive receptors on the development Phase 2 site itself, Phase 1 and proximity to noise sources / activities requires consideration and assessment.

Assessment by comparison of future noise levels with existing baseline noise measurements is acceptable providing it is comprehensive and representative. However the final noise significance of impact assessment methodology / remit and actual updated / validation of baseline / background noise surveys including duration and monitoring locations should be fully agreed with SCDC's Health & Environmental Services in advance.

Particular regard should be given to the B1050 Longstanton western bypass, which was completed in 2008 and the CGB which commenced operation in August 2011. In both cases they commenced operation after the undertaking of initial background baseline noise surveys at 23 receptors in 2003 and 2006.

The future year or years that will be used for any noise predictions and assessment should be agreed in advance including agreement on specific noise sensitive properties that should be included.

As stated above it remains our view that to fulfil EIA cumulative impact requirements the collective impacts of Phase 1, 2 and any future phases compared with baselines in the absence of any Northstowe development is required.

Environmental Noise- Assessment Significance Criteria

Little information is provided on assessment significance criteria to be used.

It should be noted that no single noise significance of impact assessment exists as different noise sources have different impact on health and quality of life and indeed may result in the occurrence of noise nuisances if not appropriately assessed etc.

Significance criteria for environmental noise affecting new dwellings - suitability of site for residential

In the absence of any current government advice on Planning and Noise we would recommend the use of the PPG 24 categories or other examples of typical qualitative descriptors that have been used

for the purposes of noise impacts on residential properties for example as detailed in the Scottish Technical Advice Note (TAN, 2011) - Assessment of Noise, in the table below:

Example of Assigning Descriptors for Qualitative Impacts from Noise on Residential Properties:

Category (PPG24 – NEC)	Perception	Criteria of Descriptor for residential dwellings	Descriptor for EIA qualitative impact	Action
0	Not noticeable	None	No Impact	No mitigation measures required
1 (A)	Just Noticeable (Non intrusive)	Noise can be heard, but does not cause any change in behaviour or attitude, e.g. increasing volume of television; speaking more loudly; closing windows. Can slightly affect the character of the area but not such that there is a perceived change in the quality of life.	Negligible-Slight - Minor Adverse	No mitigation measures required
2 (B)	Noticeable (Mildly intrusive)	Noise can be heard and may cause small changes in behaviour and/or attitude, e.g. turning up volume of television; speaking more loudly; closing windows more often. Potential for non-awakening sleep disturbance. Can slightly affect the character of the area but not such that there is a perceived change in the quality of life.	Minor-Moderate Adverse	Mitigation required and reduce impact to a minimum
3 (C)	Noticeable (Disruptive)	Causes an important change in behaviour and/or attitude, e.g. avoiding certain activities during periods of intrusion. Potential for sleep disturbance resulting in difficulty in getting to sleep, premature awakening and difficulty in getting back to sleep. Quality of life diminished due to change in character of the area.	Moderate-Substantial - Large Adverse	Avoid Dev but if justified High mitigation required and reduce to a minimum
4 (D)	Noticeable (Very disruptive)	Significant changes in behaviour and/or an inability to mitigate effect of noise leading to psychological stress or physiological effects, e.g. regular sleep deprivation/awakening; loss of appetite, significant, medically definable harm.	Large / Major / Severe Adverse	Avoid Dev Prevent

Alternatively the NPPF's Planning Practice Guidance and **Noise Exposure Hierarchy** table and proposed sematic scales for the likely average human responses to noise could be considered.

An important limitation to the advice in PPG 24 is that it concentrated on the consideration of acceptable internal noise levels as it stated that *"it should be remembered that the sound level within a residential building is not the only consideration: most residents will also expect a reasonable degree of peaceful enjoyment of their gardens and adjacent amenity areas."*

PPG 24 did / does not offer advice on external noise levels but it does refer to BS 8233: 1987, Sound insulation and noise reduction for buildings. As part of any significance of impact assessment for the suitability of the site for residential consideration should also be given to predicted noise in external private amenity areas such as gardens and or balconies or similar and consideration of mitigation as necessary. Advice given in '*BS 8233: 2014- Guidance on sound insulation and noise reduction for building'* should be considered.

It should be noted that similar advice is also given in SCDC's SPD - "District Design Guide: High Quality and Sustainable Development in South Cambridgeshire", Adopted March 2010.

Industrial Noise- Assessment Significance Criteria

We agree with the use of BS 4142: 1997 '*Method for Rating Industrial Noise Affecting Mixed Residential and Industrial Areas'* for the assessment impact of industrial type noise sources.

Whilst PPG 24 recommended the use of BS 4142 for the assessment of dominant industrial type noise sources it offered no planning guidance or test of acceptability in terms of the suitability of a site for noise sensitive development based on rating levels ascertained under BS 4142.

Consideration should be given to *SCDC's SPD - "District Design Guide: High Quality and Sustainable Development in South Cambridgeshire", Adopted March 2010:* Chapter 10 - Environmental Health & in particular Appendix 6: Noise - section 6.0: Noise sensitive residential development on a site dominated by an existing industrial type noise source only: BS 4142 assessment of acceptability, downloadable from:

http://www.scambs.gov.uk/sites/www.scambs.gov.uk/files/documents/Adopted%20Design%20Guide%20SPD%20FINAL%20%28Appendices%29.pdf

Alternatively, the use of the Institute of Environmental Management and Assessment (IEMA) and the Institute of Acoustics (IOA) [IEMA IOA], *'Draft Guidelines for Noise Impact Assessment, 2002'* could be considered.

Prediction Methodology: The uncertainly and assumptions associated with any of the sound prediction methodologies and models that may be used should be detailed and an appendix, detailing and explaining the model / standards used e.g. ISO 9613-2 "Acoustics – Attenuation of sound during propagation outdoors – Part 2: General method of calculation" dated 1996 and CRTN calculations should be included.

5.4.6.1 Construction Noise

5.4.6.2 Construction Vibration

5.4.6.3 Construction Road Traffic Noise

The assessment of construction noise and vibration in accordance with the methodology in BS 5228: 2009 Part 1 - Code of practice for noise and vibration control on construction and open sites -Noise and separately BS 5228, Part 2 – Vibration and as detailed in Appendix B is acceptable providing any cumulative impacts with Phase 1 are considered.

The approach proposed for construction traffic impact assessment is also acceptable.

However any assessment should also acknowledge the advice given in 5228: 2009 Part 1 section E.4 '*Example of criteria for the assessment of the significance of noise effects'* on construction noise trigger level exceedances for certain periods / duration and the possible offer of a scheme for the installation of noise insulation or the reasonable costs thereof, or a scheme to facilitate temporary rehousing of occupants, as appropriate.

5.4.6.4 Operational Road Traffic Noise

The approach detailed for any impacts on existing local roads is acceptable. However the impact of any new primary roads on noise sensitive premises of phase 1 and 2 require consideration.

5.4.8 Potential mitigation measures

In terms of construction impacts / effects the implementation of a construction environmental management plan to include a range of best practice measures to minimise the generation of noise is welcomed. Final requirements should be subject to approval by planning condition.

The careful design of buildings to minimise external plant noise is noted but the overall mitigation measures proposed are very limited.

Any significant adverse impacts should preferably, be designed out in the first instance, if practicable.

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 / less sensitive 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 including purge / rapid 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.

Specific Requirements for Noise Sensitive Premises

For those proposed residential façades and habitable rooms that are predicted to be most affected by transport noise / traffic noise or internal road traffic noise, it is likely that an acoustically treated purge / rapid ventilation system (mechanical or passive in wall to achieve 2 to 3 air changes per hour) will be required such that in no dwelling habitable room would the *BS 8233* "reasonable indoor / internal level" (eg 40 dB LAeq,T for living/dining rooms during the day and 35 dB LAeq,T in bedrooms at night) be exceeded with a partially open external window. Achieving a BS 8233 good level with window closed would be acceptable.

These internal levels equate to external free-field noise levels of 52 to 53 dB day (However this can exceed 50dB levels external during day) and 47 to 48 dB night respectively (assuming a 12 or 13dB reduction across open window).

In some house types, some rooms that are identified as requiring acoustically treated ventilation (whether passive or purge) may have a dual aspect. If this is the case, it is assumed that ventilation would be provided through the window that is the least affected by noise and, in this circumstance, the ventilation requirements would be driven by the predicted noise level at this window.

An integrated design mitigation approach to "design out" traffic noise impact to negate the need to have a noise insulation scheme is recommend in the first instance

In addition, external amenity areas should not be provided where noise modeling predicts noise levels above 50dB LAeq (free field) in any part of an external private amenity area e.g. private / communal garden, balconies between 0700hrs and 2300hrs.

Consideration should also be given to the impact of traffic noise from the proposed development affecting new dwellings on site in the core areas and in particular those alongside and overlooking primary traffic / highway routes

Development should not be permitted in areas which are, or are expected to become, subject to unacceptably high levels of noise in the foreseeable future unless adequate levels of protection can be secured as part of the master planning, integrally designed into the development and or acceptable and sufficient mitigation off site can be secured eg relocation of engine testing bay or upgrade in noise attenuation to testing facility.

Engineering mitigation measures to residential internal and external areas should be the last resort and to ensure a high quality design from the outset, environmental pollution constraints should be considered at the earliest opportunity in the EIA planning process as this may result in abortive works further in design process.

Additional Noise Comments

As there are numerous and interrelated noise and vibration effects and various national and local policies, standards and guidance it is recommended that a "Summary of Likely Significant Effects Table for Noise and Vibration" type table is provided to collate impacts / effects

Further advice can be obtained from Greg Kearney, Environmental Health Officer, Health & Environmental Services- Telephone No: 01954 713145 or email greg.kearney@scambs.gov.uk

5.5 Air Quality

The following comments have been provided by Kenny Abere, Scientific Officer (Air Quality), Health & Environmental Services:

1. We are satisfied with the level of the proposed monitoring subject to agreed methodology.

2. However, compared to the time of the phase 1 scoping report, the council monitoring station at Bar Hill has since been decommissioned and I'll like to suggest that our Girton monitoring site which seems closer than the rest should be used for any modelling validation.

3. In that case, as the development site seems further away to our nearest diffusion tube, effort must be made by the developer to install some tubes within and around the proposed development area in other to have a reasonable/accurate report of the quality of air around the area.

4. I observe in item 148 of the Air Quality section of the report that the energy strategy for the site is yet to be determined? We will like to advise that proper assessment of this must be made and should the proposed energy source be biomass boiler, we will also need to know the details of such boiler.

5. Whilst I understand the developer will be contacting us on the appropriate methodology, albeit, 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).

6. Whilst, we take note of the proposed potential mitigation suggested in item 155 of the AQ section, the developer is also advised to be aware of our Low Emissions Strategy requirements etc., details of which can be found in the Chapter 10 and Appendix 4 of the District Design Guide SPD via the following link:
http://www.scambs.gov.uk/sites/www.scambs.gov.uk/files/documents/Design%20Guide%20(Appendices).pdf

Further advice can be obtained from Kenny Abere, Scientific Officer (Air Quality), Health & Environmental Services- Telephone No: 01954 713070 or email kenny.abere@scambs.gov.uk

5.6 Hydrology and Flooding

(Comments provided by Pat Matthews, Drainage Manager, Health & Environmental Services- Telephone No: 01954 713472).

The on-site award drains that are the responsibility of SCDC have not been mentioned in the scoping report. Technical dialogue with the engineering consultants and the client is required as there will be important legal issues to consider if there are proposals to alter the award drains. They need to fully understand these legal issues. Additionally, the Council's Byelaws will also apply – particularly

regarding maintenance and access. No mention in the report of the Oakington attenuation ponds that are required as part of the outline application.

The proposals and scope appear acceptable in principle but should also be to the satisfaction of the Environment Agency.

The impact of any proposals on the Council's Award Drain system for the area should also be outlined in the EIA in order to avoid conflict with existing legislation - i.e. original primary legislation and the Council's Land Drainage Byelaws.

The impact of excavation and the generation of silts in downstream watercourses from the proposed areas of excavation and infrastructure works should be considered in order to comply with Land Drainage Byelaws.

Under the terms of the Council's Land Drainage Byelaws, no fencing, hedging, planting, or any other obstructions will be allowed within 5-metres of the top of the bank of the watercourse. Additionally, no increase in the rate or volume of flow will be allowed without the prior consent of the Council.

Any proposed design for the site must incorporate sustainable drainage systems that should demonstrate improvements to the downstream watercourses.

Finally, a development of the nature proposed may increase the necessary levels of maintenance along the award drain and the developers will be expected to make a small contribution towards the upkeep of the award drain by s106.

The new consultants and HCA should be involved as soon as possible with the Technical Liaison Group (TLG) so that the various on-going issues can be discussed.

Further advice can be obtained from Pat Matthews, Drainage Manager, Health & Environmental Services, Telephone No: 01954 713472 or email Pat.matthews@scambs.gov.uk

5.7 Geology, Hydrogeology and Soils

The following comments have been provided by Helen Bord, Scientific Officer, Contaminated Land Specialist, Health & Environmental Services:

I have reviewed section 5.7 **Geology, Hydrogeology and soils** of the Environmental Scoping report for Northstowe Phase 2. Generally I am satisfied that all of the appropriate issues in relation to contaminated land will be covered. I would also like to make reference to the relevant section / paragraphs of the NPPF for information, as the applicant should be aware that we will be looking for compliance with the below:

Achieving Sustainable Development

Section 11. Conserving and enhancing the natural environment

109. The planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils;
- recognising the wider benefits of ecosystem services;

- minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- **preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water** or noise pollution or land instability; and
- **remediating and mitigating despoiled, degraded, derelict, contaminated** and unstable land, where appropriate.

120. To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effect (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account. **Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner**.

121. Planning policies and decisions should also ensure that:

- **the site is suitable for its new use taking account of ground conditions** and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation;
- **after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990**; and
- **adequate site investigation information, prepared by a competent person, is presented**.

In terms of local policy, contaminated land should be considered and assessed in accordance with government / industry standards, best practice and technical guidance and South Cambridgeshire District Council's Supplementary Planning Document **- *"District Design Guide: High Quality and Sustainable Development in South Cambridgeshire"*,** Adopted March 2010: Chapter 10- Environmental Health & *Appendix 5: Development of Potentially Contaminated Sites*, downloadable from:

http://www.scambs.gov.uk/content/district-design-guide-spd

Further advice can be obtained from Helen Bord, Scientific Officer, Contaminated Land Specialist, Health & Environmental Services- Telephone No: 01954 713444 or email helen.bord@scambs.gov.uk

Health Impact Assessment (HIA) / Socio-Economic Issues

Iain Green, Public Health Specialist, Health & Environmental Services has already provided the following comments:

Approach to EIA

I agree that the key environmental issues listed in paragraph 28 are the right ones, but the areas deemed less relevant in paragraph 29 need to be listed and justified to why they are less relevant.

The list of projects which are deemed to be cumulative in paragraph 41 should not be exhaustive and the methodology will need to be flexible to adapt to changing circumstances as the whole of Northstowe develops. It is likely that Phase 3 may commence before Phase 2 is complete therefore Phase 3 needs to be added to the list of possible cumulative effects.

I am concerned that Rampton Drift has not been identified separately as an area of existing residents which might be adversely or beneficially effected by Phase 2 and therefore should be classed a separate geographic area for study and inclusion within the EIA and the Health Impact Assessment (HIA).

The assessment needs to build confidence that all the assessments are up to date and not relying on surveys/data which is 8 years old, the methodology needs to make it clear which assessments need updating and which need to be started again and the rationale for each decision will need to be given.

I am concerned that neither "waste" or "energy" has not been included as an area for assessment within the scope of the EIA/ES and there is no mention of the 10% onsite renewables requirement which will applies to the whole of Northstowe and each phase.

Health Impact Assessment

Whist there may be no statutory requirement to provide an HIA, SCDC's LDF requires a HIA to be submitted with major developments. The EIA should at the very least acknowledge that the EIA and HIA are both inextricably linked and that the ES will assist with and provide useful information for any HIA that needs to be undertaken.

SCDC's LDF adopted July 2007 includes POLICY DP/1 Sustainable Development, which states that:

"3. For major developments, applicants must submit a Sustainability Statement and a Health Impact Assessment, to demonstrate that principles of sustainable development have been applied."

Paragraph 2.5 states that major development is defined as "Residential development: the erection of 20 or more dwellings, or, if this is not known, where the site area is 0.5 hectares or more;"

It should also be noted that SCDC also adopted in March 2011 a "Local Development Framework , Health Impact Assessment, Supplementary Planning Document".

In paragraph 2.10 of the HIA SPD under 'Relationship to other assessments (Environmental Impact Assessment' it is acknowledged that:

"For those development proposals that are already required to submit an Environmental Impact Assessment (EIA) it may make sense to integrate health impacts into the EIA rather than duplicate the assessments as the methodology is very similar and there is a large overlap in the evidence gathered and used in both assessments. The Council's preferred approach is for Health Impact Assessments to be integrated with other similar assessments to ensure the HIA is wide ranging and has adequately examined all the potential health impacts of a development. It also makes it easier to cross reference the impacts helping to ensure the HIA is comprehensive".

HIA General

New communities and developments should be planned and designed at the beginning of the process, to take full advantage of the opportunities to improve the health of local people and to reduce health inequalities in an holistic manner.

Spatial planning and development has the potential to impact on human health and wellbeing. This is because a wide range of social and environmental factors affects the health of local communities within South Cambridgeshire. These are known as the "Wider Determinants of health" and include:

- Individual lifestyle factors such as smoking habits, diet and physical activity.
- Interactions with friends, relatives and mutual support within a community.
- Wider influences on health including - living and working conditions (air quality and noise), unemployment, water and sanitation, health care service, housing, food supplies, education, and the work environment.

Ensuring these issues are considered at the planning and design stage can improve both the physical and mental health of the population. These can encourage environments which: increase people's sense of safety and wellbeing, their opportunities for social interaction and community connectivity, improve air quality and water conservation and promote active travel and physical activity.

It is important to consider the effects of the wider determinants of health on not only the physical environment (e.g. air pollution, noise, traffic generation / patterns, housing stock) but also the social environment, which refers broadly to the social norms and values shared by members of social groups, as well as the quality, content, and volume of interpersonal interactions within urban and rural and between urban and rural communities. It is also known that these wider determinants are not distributed equally among populations (e.g. those people living in areas of deprivation tend to have

poorer health outcomes). By considering these effects and their distribution at an early stage can enhance the potential to influence health and wellbeing, and health inequalities holistically.

The approach taken by not integrating the EIA and HIA may result in many issues being examined and submitted as part of other documents, which may be submitted, for example:

- Energy Strategy
- Construction Environmental Management Plan
- Remediation Strategy for areas of Contaminated land and/or groundwater
- Earthworks Strategy
- Night time visual assessment
- Operational Waste Management and Minimisation Strategy
- Traffic and Transport Assessment
- Soil Management Plan
- Planning Supporting Statement
- Design and Access Statement
- Travel Planning Measures
- Transport Assessment (TA)
- TA Scoping Report
- Site Waste Management Plans (SWMP)
- Waste Management Strategy
- Waste Design Toolkit
- Low Emissions Strategy
- Flood Risk Assessment
- Water Conservation Strategy

I am concerned that their non-inclusion as part of the ES may weaken their statutory footing? It also makes it harder to pull together all the environmental issues in one place. The EIA/ES should pull together the significant issues from these other strategies/plans that will be submitted as part of any planning application – it is unclear from the scoping document that this will happen.

Socioeconomic

I agree that the development will likely cause a range of socioeconomic impacts consistent with those listed in paragraph 60 and it is important that these are also considered within the Health Impact Assessment (HIA) and as such there will need to be good links and cross referencing between the Environmental Assessment and the HIA.

There needs to be a robust methodology for updating the baseline data particular as it is likely to change when Phase 1 becomes occupied.

I am concerned that the scope of the socioeconomic is limited to the “wards immediately adjoining the site” and the “district of South Cambridgeshire” due the scale and nature of the development it may be prudent to look at other geographic areas such as Cambridge City particularly in relation to the impact on and by the Cambridgeshire Guided Busway (CGB). If Cambridge City or other areas are not to be included the assessment needs to make clear as to why not.

The first bullet point under paragraph 63 relating to crime and deprivation using IMD data needs to separate these out and look at all the relevant IMD domains relevant to the area not just crime and/or deprivation.

The list of stakeholders referred to in paragraph 64 and 76 is out of date and/or needs to be expanded, the Primary Care Trust have not existed for the last 12 months, and has been replaced by the following:

- Cambridgeshire and Peterborough Clinical Commissioning Group
- CATCH – the local Clinical Commissioning Group
- NHS Property services
- Public Health which is now part of Cambridgeshire County Council, and
- NHS England
- Cambridgeshire Travel for Work Partnership

All of the above need to be consulted as major stakeholders. In addition the consultants employed to carry out the assessment need to recognise that Northstowe will be located in a two tier Local Authority area which means gaining an understanding that the two councils South Cambridgeshire District Council (SCDC) and Cambridgeshire County Council (CCC) both provide different services, for example paragraph 64 mentions leisure services which is an SCDC function and education which is a CCC function. I would also not be specific about which departments within each organisation needs to be consulted but allow each organisation to consult internally themselves as there is a danger that departments may get missed if not requested specifically.

I agree that Phase 2 will impact on local job creation and there needs to be an acknowledgement and an assessment of the capacity of local housing provision to house people employed in relation to the additional jobs related to construction. I would also like to see an assessment on the feasibility on requiring a proportion of construction and associated employment to be sourced locally as part of the socioeconomic assessment.

The socioeconomic assessment should be linked to a "Health Needs Assessment".

Traffic and Transport

I agree that the significant effects identified in paragraph 90 are probably the right ones

The topics identified in paragraph 96 should also be included within the HIA and therefore need to crossed referenced between the HIA and EIA.

The Figure 2 on page 22 would benefit from including the location of Phase 2 and the main boundary of Northstowe to help locate development in the landscape. This should be applied to all maps within the ES/EIA when submitted.

In addition to the consultees identified with paragraph 103 relating to transport I would also include the Cambridgeshire Travel for Work Partnership.

Noise and Vibration

Paragraph 112 references receptors used to calculate the baseline for noise and vibration. In the final submitted ES/EIA these need to be defined in terms of location and measurement position as noise can vary depending on the precise location the measurements are taken e.g. at boundaries/façades/gardens etc. all of which have a bearing on the use and enjoyment of that location in relation to noise levels i.e. the scope should include areas used both inside and outside of a dwelling when assessing noise levels and suitable mitigation measures.

As indicated in paragraph 139 the noise assessment will need to be flexible enough to be updated as and when necessary in order to cope with a layout which at present is not fixed.

In addition to the consultees identified in paragraph 141 I would also include Cambridgeshire County Council Education department as noise can have a detrimental effect on learning.

Hydrology and Flooding

The assessment needs to assess and come to a view on "future proofing" for flooding events both due to ground and surface water. The baseline should be updated particularly in light of recent national flooding events.

An assessment should include an examination and prediction of the use of the open space which is included within the "swales" and flood mitigation measure to give both a best and worst case scenario of the amount of time this open green space will or will not be available for recreational purposes due to flooding therefore fulfilling its function as a flood mitigation measure.

The assessment should include an assessment of any effects due to flooding on CGB cycleway which already floods particularly relating to transport and the socioeconomic assessment.

Geology, Hydrogeology and Soils

The methodology indicated at paragraph 208 for qualitative assessment may not fit with the buried munitions/ordnance i.e. the source-pathway-receptor model and the ES should either show how it does fit and is therefore the appropriate model or use another methodology/strategy.

The assessment would benefit from an assessment of the loss of agricultural land linked to local food production.

Landscape and Visual Effects

The assessment should reference and use the Cambridgeshire Green Infrastructure Strategy. (https://www.scambs.gov.uk/sites/www.scambs.gov.uk/files/documents/Cambridgeshire%20Green%20Infrastructure%20Strategy%202011.pdf)

There is potential for light pollution from a development this size particularly taking the whole of Northstowe into account e.g. from industrial, MUGAs etc that have not been adequately reflected in the scoping document and as such any mitigation measures should include a lighting strategy/plan as well as landscape and visual effects assessment mitigation measures

A link needs to be made on the importance of landscape and visual amenity with health and sense of place, this might be outside the scope of an EIA and ES but needs to be covered somewhere within the planning document preferably with the HIA.

In preparing any HIA or similar due regard should be given to South Cambridgeshire District Council's Local Development Framework, Supplementary Planning Document- *"Health Impact Assessment", Adopted March 2011*-downloadable via:

http://www.scambs.gov.uk/content/health-impact-assessment-spd

Further advice can be obtained from Iain Green, Public Health Specialist, Health & Environmental Services- Telephone No: 01954 713209 or email Iain.Green@scambs.gov.uk

ES Scope Additional Issues / Possible Omissions

Risk of Unexploded Ordnance (UXO)

Para 219 of section 5.7 Geology, Hydrogeology and Soils simply sates that mitigation that relates to any buried ordnance and munitions will be determined by a specialist subcontractor and stated as part of the earthworks strategy to be produced for the site.

This is our view is limited and does not give full consideration to additional indirect impacts, cumulative impacts or mitigation as necessary associated with UXO. This matter was also a matter of concern and detailed consideration at the phase 1 outline application stages.

From circa 1939 / 40 a Royal Air Force base, RAF Oakington was constructed on the development site at Oakington covering 540 acres (220 ha) serving as a base for bomber forces and reconnaissance planes. After the war it was transferred to the army and used as a training ground for explosive ordnance training, storage and testing. The airbase was converted to Oakington barracks in 1975, which in turn closed in 1999.

It is understood that the entire Northstowe site has been subject to previous UXO detailed desk top surveys and electromagnetic geophysical (high performance magnetometer surveys) site surveys undertaken by Bactec (Bomb Disposal Specialists). These surveys have identified numerous "high" risk UXO targets within an Explosive Ordnance Threat Assessment on both the South West corner of the Phase 1 application site, where it abuts Brookfield farm and on future Phases of land and in particular on the previous land used during World War II as an airbase.

It should be noted that certain high risk viable UXO targets were identified and subsequently cleared in 2007/08 by controlled explosion (RAF Bomb Disposal) which necessitated the implementation of evacuation zones ranging from 500m to 1.5km radius, the latter encompassing most of Longstanton, Rampton and half of Oakington.

The Phase 1 application ES did not identify UXO as a specific potential significant environmental effect / impact and similarly this ES scope fails to mention all the potential impacts associated with UXO.

It is understood that more recently Zetica (engineering and environmental geophysics consultants - jointly appointed by Gallaghers and the HCA) have reviewed previous UXO studies etc for the entire site and have produced an additional UXO risk management and mitigation programme / plan including draft mitigation plans for consideration and implementation.

However to date the results of the reviews, surveys etc and UXO risk management and mitigation programme / plan have yet to be published or provided to this service for detailed consideration.

It is the “high” risk targets that require careful consideration in terms of an acceptable UXO remediation / clearance certification strategy.

It is understood that the final intrusive investigations to identify the viability and actual risk of any of the identified high risk target have not been undertaken to date. It is therefore not possible to confirm if controlled explosive clearance will be required that would result in the need to carry out further evacuation plans.

This introduces serious uncertainty and has important implications for any phasing plan for the Northstowe site. There may be repercussions in terms of health and safety concerns and inconvenience to existing and potentially new residents of Phase 1, 2 and future phases, should the evacuation of homes be necessary, depending on the nature of any UXO risk.

In addition there may imputed costs associated with the potential evacuation of homes and if the construction of Phase 1 has commenced and depending on how advanced the development is, there may the additional costs if there is structural and other building damage to any new development (including liability issues), which will be considerably closer to the airbase when compared with existing residents.

It is our view that a strategy / plan for certifying that the site is free from UXO this is a material consideration and the most sensible and preferable approach would be to clear the whole of the affected site on and around the airfield, as a single operation.

Clearly, if UXO clearance certification is undertaken on a phase-by-phase basis then it may involve several evacuations of homes over a potentially wide area (depending on the level of danger and location of UXO) that covers Longstanton, Oakington and parts of Rampton / Willingham including any phase 1, 2 residents.

A clear strategy / plan needs to be agreed and implemented to adequately mitigate / remove the risk of UXO and associated impacts.

It should be noted that schedule 4 of the EIA regulations do not expressively use the terms 'safety' or 'risk', but clearly does require a description of the main characteristics of the production processes, including the nature and quantity of substances. Schedule 3, dealing with screening criteria, refers to *'the risk of accidents, having regard in particular to the substances or technologies used'.*

Therefore the risk of accidents or explosive risks and the possible direct and indirect effects / impacts including evacuation potential, together with proposed preventive and remedial measures, should be covered in the ES.

Artificial Lighting Impact

The only reference to the impact of artificial lighting is in section 5.8 Ecology and Nature Conservation paragraph 258 under mitigation and reference to the inclusion of measures to minimise the impacts of lighting on bats and other wildlife, including the use of directional lighting and reducing light levels. The appended *URS, Northstowe, Protected Species Report, July 2013* and *ARUP, Northstowe Phase 2, Ecology Report, January 2104* make similar references to bat impacts.

Other than reference to impact on bats artificial lighting appears to have been entirely scoped out of the ES or otherwise overlooked.

It is our view that this is unacceptable as by virtue of the nature, size and location of the proposals, obtrusive artificial lighting has the potential to have wider significant environmental impacts. These can vary in significance depending on the type and sensitivity of the receptors both existing and proposed, but can include:

- ecological: fauna (large & small) & flora,
- residential / human,
- highway,
- landscape and visual .

It is possible that floodlighting will be provided to the sporting / recreational areas and general lighting along highways / access roads, within car park areas, public areas and external building lighting.

Environmental Health consider the impact of artificial light on residential premises as it can affect health and quality of life and can be determined a statutory nuisance.

Poorly designed, controlled and distributed artificial light can result in adverse impacts to the surrounding environment. Obtrusive light impacts can include:

- **Sky glow**: the upward spill of light into the sky, which can cause a glowing effect. This is often seen above cities when viewed from a dark area.
- **Light spill**: the unwanted spillage of light onto adjacent areas, which may affect sensitive receptors, particularly residential properties and ecological sites.
- **Glare**: the uncomfortable brightness of the light source against a dark background, which dazzles the observer. This may cause nuisance to residents and a hazard to road users.
- **Light trespass**: the spilling of light beyond the boundary of a property, which may cause nuisance to others.

To comply with EIA regulations an assessment should be undertaken that considers the existing baseline lighting conditions and the potential artificial lighting impacts during site preparation, construction and operation in relation to surrounding sensitive receptors including local residents, the night time amenity including sky glow, sensitive landscape and ecological features, road users and pedestrians and consideration of mitigation measures.

It should be noted that the NPPF encourages good design, with planning policies and decisions limiting the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

South Cambridgeshire Development Control Policies DPD, July 2007 also includes specific policies on lighting as follows:

POLICY DP/3 Development Criteria

2. Planning permission will not be granted where the proposed development would have an unacceptable adverse impact:

n. From undue environmental disturbance such as noise, lighting, vibration, odour, noxious emissions or dust;

LIGHTING POLICY NE/14 Lighting Proposals

1. Development proposals which include external lighting should ensure that:

a. The proposed lighting scheme is the minimum required for reasons of public safety and security;
b. There is no light spillage above the horizontal;
c. There is no unacceptable adverse impact on neighbouring or nearby properties or on the surrounding countryside;
d. There is no dazzling or distraction to road users including cyclists, equestrians and pedestrians;
e. Road and footway lighting meets the District and County Councils' adopted standards.

It is therefore our view that instead of having the impact of artificial lighting in various separate chapters such as Landscape & Visual Impact, Ecology and something separate for human impact a dedicated artificial lighting impact separate topic chapter for all receptors should be included in the ES. A lighting chapter was included in previous ESs undertaken for the original application in 2007/8 and Phase 1 ES. The 2007 ES had a separate chapter 6 on Lighting, which was robust and comprehensive with adequate mitigation measures outline. It is likely that this assessment in the main remains valid subject to some validation of night time baseline lighting levels.

Such an artificial lighting impact assessment should be carried out in accordance with current government / industry standards or best practice guidance on undertaking environmental assessment of lighting and similar, such as:

- *Guidance on undertaking environmental lighting impact assessments* (PLG04: 2013) by the *Institute of Lighting Professionals (IPL)*. The aim of this document is to outline good practice in lighting design and provide practical guidance on production and assessment of lighting impacts within new developments.

- *Guidance notes for the reduction of obtrusive light* (GN01: 2011) produced by the ILP. GN01:2011 is the piece of guidance most commonly referred to in government policies, scoping opinions and condition clauses. Consideration of existing baseline environmental lighting zones in the area and any impacts on these. It provides a list of lighting dos and don'ts, as well as design guidance limits to ascertain the acceptability of obtrusive light levels at night.

- *Guide on the limitation of the effects of obtrusive light from outdoor lighting installations* (CIE 150) produced by the International Commission on Illumination (CIE) and *Guidelines for minimising sky glow* (CIE 126). These documents provide guidelines for assessing the impacts of outdoor lighting.

- *Guide to limiting obtrusive light* by the Chartered Institution of Building Services Engineers. This document contains guidance for planners and lighting designers regarding limiting obtrusive light and improving quality.

- *Clean Neighbourhoods and Environment Act 2005*

- *Code of practice for the design of road lighting Part 1: Lighting of roads and public amenity areas (BS 5489-1:2013)*

- *Bats and Lighting in the UK. This guidance from the ILP and the Bat Conservation Trust is intended to raise awareness of the impact of lighting on bats and suggests mitigation for various scenarios.*

- *Guidelines for Landscape and Visual Impact Assessment, 3rd Edition* (GLVIA3 – April 2013) by Landscape Institute and the Institute of Environmental Management and Assessment (IEMA).

- *A Review of the Impact of Artificial Light on Invertebrates: March 2011produced by* Buglife – The Invertebrate Conservation Trust.

Please note that Environmental Health only consider in detail the effects of artificial lighting on humans such as residential receptors. These comments do not consider in detail potential impacts / effects on other environs / receptors such as businesses, landscape / visual, ecological (fauna behaviour & breeding), drivers on public highway or secured by design requirements or other interested organisations such as Astronomy Organisations (sky glow). These effects should be considered by respective specialists in those areas.

Further advice can be obtained from Greg Kearney, Environmental Health Officer, Health & Environmental Services- Telephone No: 01954 713145 or email greg.kearney@scambs.gov.uk

Waste Generation and Management / Waste and Recycling

The following comments have been provided by Andrew Hinge, Contracts Manager, Environment Operations, Growth Areas & Planning Team, Health & Environmental Services:

The scoping report has failed to include any commentary, reference to or specific detail on waste generation and or management, either during the construction phase or after occupation or the waste requirements of the SPD design guide.

As a scoping report for such a major development it is our view that waste management needs to be considered in a specific chapter topic within any ES in accordance with the requirements of Regulation 13 of the EIA regulations, as defined and referenced in points 1.8, 1.9 and 1.10 of the report and Schedule 4 of the EIA regulations.

The regulations do clearly mention "waste" as one of the key factors that need to be considered in the criteria when assessing a Schedule 2 development, as detailed in Schedules 3 and 4.

Schedule 4- Information for inclusion in environmental statements of the EIA regulations and specifically paragraph 4 states:

4. A description of the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development, resulting from—

(a)the existence of the development;

(b)the use of natural resources;

(c)the emission of pollutants, the creation of nuisances and the elimination of waste,

and the description by the applicant or appellant of the forecasting methods used to assess the effects on the environment.

Whist this is a scoping opinion consultation it is also noted that ***Schedule 3 - Selection criteria for screening Schedule 2 development*** of the regulations also specifically refers to the production of waste in paragraph 1(c), as follows:

1. *The characteristics of development must be considered having regard, in particular, to—*

(a)the size of the development;

(b)the cumulation with other development;

(c)the use of natural resources;

(d)the production of waste;

In the absence of any justification for not including waste it is our view that construction and operation waste impacts require detailed consideration as a potential significant environmental impact / effect and warrant a specific topic chapter.

The potential effects associated with the management of waste during the construction and operation of the scheme should be considered.

The amount of waste generation is in our view is likely to be a significant environmental impact / effect either directly or indirectly off site and should be considered as a specific topic. They all have a bearing on the whole, whether its phase 1, 2 or the completed Northstowe, and we need to know the intentions for waste storage and collection and appreciate road layouts and other factors for example. We would also want to understand the SWMP for the initial assessment in order to know its impact and how it will fit in.

We also need to understand the bigger picture and not just phases 1 and 2. The entire development needs coordinated long term waste arrangements and infrastructure planning that is workable from the outset. For example Phase 1 and 2 may have a different refuse collection system to other phases or indeed the rest of the council's area. SCDC may be left paying for a bespoke system that only applies to a small area.

The impacts of a waste storage and collection system could have indirect significant environmental impacts, for instance the noise impact of an underground storage system compared to a conventional bin system, or the land take-up for different systems.

The environmental impact associated with site preparation and building prior to occupation as detailed need to be understood, in principle, within the ES sooner rather than later, when reality may be something unacceptable.

The assessment should identify the waste management objectives and targets to which the proposed development is required to comply with (Legislation and Planning Policy framework at the national and local levels); describe and define the main waste streams and systems; provide estimates of waste arisings for the main waste storage and separation streams/systems and consider the main waste issues within the demolition, construction and operational phases. It should also aim to demonstrate how the development will take into account sustainable methods for waste management at all stages having regard to Code for Sustainable Homes (CSH) 'level 4' and Building Research Establishment Environmental Assessment Method (BREEAM) waste credits. Key activities with regard to waste management should be set out and a description of the Site Waste Management Plan (SWMP) should be given.

It is also important to note that operation waste and recycling requirements can have indirect impacts that can influence street scene / highway design and layout, urban design, visual and can impact on amenities in terms of dust, litter, odour or pests.

Typical sources of guidance include:

- BS5906: 2005 Waste management in buildings — Code of practice
- CIBSE Guide G (2004) Part 4 – *Waste Management Systems*
- Institution of Civil Engineers: Resource Sustainable Communities Waste - Vol. 1: Waste Infrastructure & Management, A code of practice (operational document) & "Planning for resource sustainable communities: Waste Management and Infrastructure -Code of Practice - Main Document" that supports "Operational Document".
- and the Resource Sustainable Communities Waste
- Part H6 of the Building Regulations
- Cambridge & Peterborough RECAP Partnership *Waste Management Design Guide Supplementary Planning Document* (RECAP Design Guide) Adopted February 2012

The Cambridgeshire and Peterborough Minerals and Waste Core Strategy sets out a requirement for developments to make provision for waste storage, collection and recycling in accordance with the content of the RECAP Partnership Waste Management Design Guide Supplementary Planning Document (RECAP Design Guide).

Similarly developers are also required to financially contribute to the provision of waste management infrastructure including waste storage containers, Household Recycling Centres and Bring sites within Cambridgeshire and Peterborough. The RECAP Guide provides advice on the design and provision of waste management infrastructure as part of residential and commercial developments.

The RECAP guide also includes a toolkit to be used by developers to demonstrate how they have addressed the waste management infrastructure requirements as part of their proposals. **The toolkit applies to all developments and should be submitted as part of any application.**

All architects and developers need to fully consider all the information contained in the RECAP Design Guide at an early stage, to ensure compliance with and consideration of all the waste and recycling requirements for domestic and commercial development.

The RECAP Design Guide can be downloaded from the following links:

http://www.cambridgeshire.gov.uk/environment/planning/mineralswasteframework/recapwastemanagementdesignguidespd.htm

http://www.recap.co.uk/recap-partnership/further-work/waste-management-design-guide

Further advice can be obtained from Andrew Hinge, Contracts Manager, Environment Operations, Growth Areas & Planning Team, Health & Environmental Services- Telephone No: 01954 71346 or email Andrew.Hinge@scambs.gov.uk .

Code for Sustainable Homes / Sustainable Building Construction

The Code for Sustainable Homes which is a mark of sustainable house build quality / standards and operates a level rating system, based on a point system. Minimum standards have to be achieved for certain categories such as energy and drainage but addition credits / points can be given for categories such as Health & Well Being (Daylight, Sound Insulation, Lifetime Homes, and advanced Household Waste Facilities / Composting).

The ES should consider how a higher rating could be achieved by providing additional waste / recycling provision and a higher level of noise insulation at minimum extra cost as appropriate.

General Advice

The ES generally should reference and have due regard to South Cambridgeshire District Council's Supplementary Planning Document - *"District Design Guide: High Quality and Sustainable Development in South Cambridgeshire",* Adopted March 2010: Chapter 10- Environmental Health & various associated technical appendices and requirements for topic areas such as air quality, noise, contaminated land etc, downloadable from:

http://www.scambs.gov.uk/content/district-design-guide-spd

Thank you for the opportunity to comment. If there are any issues that require further explanation or information then please contact us and or the relevant person detailed under the specific topic / issue heading.

Greg Kearney

Environmental Health Officer

Health & Environmental Services

From: Mungovan Rob
Sent: 28 March 2014 17:14
To: Harvey Emily
Subject: RE: Northstowe Phase 2 - Environmental Scoping Report

Hallo Emily

I have read the scoping document that you provided (and the majority of the doc provided direct by the Arup Ecologist). I am generally satisfied with the scope of the surveys. The document has pulled together the extensive range of the surveys undertaken over nearly 10 years and presented it in a clear manner with direction as to what further surveys are required and when they are to take place.

Part 5.8.4.1 details the extent of further survey work, it does not include a repeat reptile survey. This is most certainly based on the conclusion that the previous surveys only found low numbers of common lizards, however the survey work on the golf course resulted in the translocation of ~650 common lizards and I found it hard to believe that the Phase 2 site is so much different in its reptile density to the Phase1 area (I do realise that Phase1 is largely a managed golf course but juvenile lizards were being found in rough grassland habitats. I belive that further survey effort should be direct to the boundary of Phase2 with the golf course area.

No further comment to make at this time.

Regards

Rob Mungovan CMIEEM | Ecology Officer

South Cambridgeshire District Council

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From: Parry Tam [mailto:Tam.Parry@cambridgeshire.gov.uk]
Sent: 04 April 2014 14:03
To: Harvey Emily
Subject: EIA comments

Hi Emily,

I am sure that I have sent these to you already but have no record of it so here are my comments again just in case you did not get them on Tuesday.

I have read the scoping report for traffic and transport and note that this work is largely based upon the work as set out in the Transport Assessment for Phase 2. I have a few comments / questions which are minor in nature.

Section 5.3.2 para 81 The development of Phase 2 could have an impact on the village of Oakington to the south of the site, either through the use of the Airfield Road, (Longstnton Road - until such a time that it is closed), or through use of Dry Drayton Road and other roads in the village due to the potential construction of the Dry Drayton Road link. The description of the base line should also consider this area.

Section 5.3.3 para 86 This approach is accepted although for other reasons the second access road may need to be considered ahead of its potential due date.

Section 5.3.4 para 90 New non motorised user infrastructure would apply to within the site and it is hoped outside of the site to surrounding villages. The provision of a new bus route may also be the extension of an existing bus route to serve the development.

Section 5.3.5 It is accepted that the Transport Assessment should form the basis for this work as this will assess the potential impact on the surrounding road network of the development.

Section 5.3.5 para 96 Should this section also consider pedestrian amenity? Are the details as outlined in para 97 pedestrians amenity criteria in terms of footway width and crossings? Are other factors also to be considered in terms of pedestrian amenity as I note that this be covered elsewhere in para 96?

Section 5.3.5 para 99 The scenarios to be tested could also include the CSRM model run of 2026 which is noted in para 100 as being potentially required. It is my understanding that this model run is to be completed. (2026 interim year of Phase 1+ partial 2 with A14 and Hatton's Road Link (highway results of interest for ES)

Section 5.3.7 The mitigation of the construction phase can be dealt with the CEMP as proposed and may also need to consider routes to avoid as many dwellings as possible whether in Longstanton or Oakington. For the completed phase should potential mitigation also be considered for the effects noted in para 96? Would severance be considered under pedestrian and cycling improvements, driver and pedestrian delay within junction improvements? (Do you look at non junctions and other areas of potential delay, potentially where there is on street parking or traffic calming measures?) Would accidents and safety also be considered under the above two items?

Regards

Tam

Tam Parry

Principal Transport Officer Northstowe

Growth & Economy

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http://www.cambridgeshire.gov.uk/environment/planning/new-communities.htm

From: Thomas Andy [mailto:Andy.Thomas@cambridgeshire.gov.uk]
Sent: 25 March 2014 08:14
To: Harvey Emily
Subject: RE: Northstowe Phase 2 - Environmental Scoping Report

Hi Emily

Thanks for forwarding the relevant sections.

I am broadly in agreement with the approach outlined, drawing as it does on the assessment undertaken for the previous application. I would however make the following comments.

The baseline study should include consideration of any new archaeological investigations undertaken in the vicinity since the previous application, to enable a comprehensive understanding of the archaeological landscape. The County Historic Environment Record should be consulted for this information.

The baseline should also acknowledge that substantial and significant archaeological works are likely to proceed at Northstowe Phase 1 before implementation of mitigation for Phase 2. These works are likely to make a major contribution to our understanding of the archaeological landscape and, in some instances, may be directly related to sites in Phase 2.

Trial trenching - we would not object to further trial trenching in the Phase 2 area. It should however be considered as a evaluation strategy and not mitigation. As such, it should be undertaken in support of the planning application. I would also advise you that the mitigation strategy for the previous application included methodologies for examining potential for additional, presently unidentified archaeological sites and that we agreed that additional trenching would not be required.

It is highly unlikely that we would consider a watching brief to be an acceptable form of mitigation on any part of this site. Archaeological works undertaken to date indicate that investigation in advance of construction is likely to be the most appropriate form of mitigation, to be undertaken in accordance with agreed written schemes of investigation. This would include site work, post excavation analysis and publication of the results. Outreach and education programmes would also need to be included, as well as on site interpretation to contribute to a greater awareness of the historic environment within the emerging new community.

Preservation in situ of identifiable archaeological assets may be appropriate where this can be achieved during the course of and post construction. Where this is agreed, safeguards will be required to ensure that no damage occurs to the asset.

Please let me know if you need any additional information.

Regards

Andy

Andy Thomas

Senior Archaeologist

Historic Environment Team

ENGLISH HERITAGE
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Your ref: S/0654/14/E2

4 April 2014

Dear Ms Harvey

PHASE 2 NORTHSTOWE, ENVIRONMENTAL IMPACT ASSESSMENT SCOPING REPORT
LPA Ref: S/0654/14/E2

Thank you for your electronic notification of 24th March 2014 inviting English Heritage to provide comments on the scoping report for the above development.

English Heritage is primarily concerned about how this development will impact on the historic environment; both designated assets (including scheduled monuments, listed buildings and conservation areas) and undesignated assets (including undesignated buried archaeology and buildings of local interest). The EIA will need to consider both direct impacts (ie on features and assets within the development site) and indirect impacts (ie on the setting of nearby heritage assets).

The Scoping Report submitted on behalf of the applicant includes a section on Archaeology and Cultural Heritage. In respect of archaeology, we note that a programme of work was undertaken across the whole Northstowe site between 2004 and 2007, but there may be a need to review and update those investigations to accommodate updated design and masterplanning. The need for any updating of the archaeological assessment should be discussed with the County Archaeologist.

Paragraph 262 identifies the key designated heritage assets that will need to be assessed within the Environmental Statement (ES), but no mention is made of undesignated heritage assets (such as unlisted structures associated with the WWII airfield).

Section 5.9.7 covers the Assessment Methodology to be adopted and paragraph 268 refers to a 'bespoke methodology proposed in the 2007 EIA' and a matrix approach to assign overall importance summarised in Table 4. English Heritage has some

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concerns over this proposed methodology. In 2007 we were still using PPG15 and PPG16 when assessing impact of development proposals on the historic environment. In March 2010 the Government replaced these documents with PPS5, and more recently in March 2012 the current Government introduced the National Planning Policy Framework (NPPF). English Heritage therefore considers that the assessment methodology is out of date and needs to reflect the criteria and language adopted in the NPPF. Furthermore we believe that assessment of impact is a matter for sound professional judgement and this can often be lost in an over-reliance on matrices and scoring systems.

Table 4 also makes no differentiation between designated and non-designated heritage assets and appears to include inconsistencies. By way of example the archaeological period for WWII is allocated *Medium* importance, but then the Oakington Pillboxes which date from this period are given *High* importance, while other WWII structures are only allocated *Low* importance. This may be a reflection of the listed status of the pillboxes, but that does not fully account for undesignated WWII structures being allocated *Low* importance if the archaeological period is regarded as being of *Medium* importance. We also note that the post-medieval period is again only allocated *Low* importance, but there are several listed buildings affected by this development which belong to this period and which we consider should be given *High* importance. The table further suggests that the conservation areas affected by the development will only be considered of *Low* importance, but again we would consider that they should be classed at least of *Medium* importance.

It is unclear from the assessment methodology how the issue of setting is to be assessed. Again it should be noted that since the original EIA in 2007 English Heritage has produced guidance on the assessment of developments on the setting of heritage assets (October 2011). We therefore recommend that the process outlined in our document is adopted for assessing the impact on setting of this development. Our guidance can be downloaded from the professional pages of our website.

Some aspects of impact on setting of heritage assets appear to spill over into Section 5.10 on Landscape and Visual Effects (as suggested by references in paragraphs 283 and 284). Setting is more than just a visual matter and English Heritage is concerned that separating out visual effects into a separate chapter may result in an inadequate consideration. In our opinion all matters affecting cultural heritage should be considered within a single section.

Please let me know if I can be of any further assistance in this matter.

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Yours sincerely

[redacted]

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