

APPENDIX 2.2

SCOPING OPINION

**Town and Country Planning (Environmental Impact Assessment)
(England and Wales) Regulations 2017**

Scoping Opinion

Land Cambridge North Commercial Quarter, Cambridge

Hybrid Planning Application comprising:

Full Planning Application for c47,280sqm (GEA) of Class E floorspace comprising an office building (One Milton Avenue) and two lab buildings together with ground floor amenity uses, a Mobility Hub comprising of c1031 car parking spaces including 254sqm of Class E floorspace at ground floor level, a temporary car park of c379 spaces, a wildlife habitat area, Network Rail compound area, enabling works and associated infrastructure; and

Outline Planning Application for c41,940 sqm (GEA) of Class E floorspace comprising one lab building and one office building, together with ground floor amenity uses, enabling works and associated infrastructure.

**Scoping Response on behalf of
South Cambridgeshire District Council
Planning Reference 21/05178/SCOP**



09 February 2022

Introduction

1. Environmental Impact Assessment (EIA) is an iterative process that attempts to ensure that any significant effects on a range of environmental issues that might result from a particular development are fully understood and taken into account prior to any planning decision being taken.
2. 'Scoping' forms part of the overall EIA process, and attempts to identify all of the possible environmental impacts that a development project might cause, and then to subsequently determine which of those impacts are likely to be significant and which therefore require detailed investigation in the EIA.
3. The effects of the proposal on a range of environmental topics should be assessed in terms of their characteristic (adverse, beneficial, neutral, direct, indirect, cumulative), scale (international, national, regional, direct, local) and significance (long term, short term, irreversible, reversible, major, minor) together with their timing (pre-construction, construction, operation/occupation, decommissioning, restoration). Where the potential for significant environmental effects have been identified as part of a scoping exercise, the Environmental Statement (ES) comprising part of the EIA process should propose mitigation and monitoring measures.
4. The Town and Country Planning (Environmental Impact Assessment (England and Wales) Regulations 2017 ('the 2017 Regulations') form the basis for the scoping procedures, by allowing a 'person minded to make an EIA application' to ask the relevant planning authority to state in writing their opinion as to the scope and level of detail of the information to be provided in the Environmental Statement (ES), in the form of a Scoping Opinion.

Application 21/05178/SCOP

5. This Scoping Opinion is based on information provided to South Cambridgeshire District Council ('the Council') in the form of an Environmental Impact Assessment Scoping Report dated November 2021 from Bidwells ('the Scoping Report'), and covering letter dated 25 November 2021 ('the Covering Letter'), together with the comments and opinions resulting from consultation with other bodies.
6. The scoping exercise was initiated following the receipt of the above documents and constituting a formal request for a scoping opinion to the Council. This Scoping Opinion has been prepared and issued by the Council in response to the request as part of the EIA process.
7. In accordance with the 2017 Regulations, this Scoping Opinion shall not preclude the Council from subsequently requiring the developer to submit further information in connection with any application subsequently submitted to the Council.

Consultation

8. During the scoping process, formal consultation was undertaken with the relevant statutory agencies/authorities, and other relevant parties seen to have an interest in the proposal and/or having expertise in the environmental issues relevant to this site. A list of the parties consulted can be found in Appendix A of this document.
9. Representations received can be viewed online through the Council's planning search service, using the reference **21/05178/SCOP** via this link [View and comment on planning applications \(greatercambridgeplanning.org\)](https://www.greatercambridgeplanning.org)

Comments on Scoping Report

10. The Scoping Report comprises a request for a Scoping Opinion under Regulation 15 of the 2017 Regulations. The request includes the information required under Regulation 15 (2), in addition to additional information which sets out the proposed approach to the EIA and technical assessments and the intended structure of the ES.
11. It is an expectation that in submitting the ES, all necessary information is provided as identified in Part 4 of the 2017 Regulations.

Section 1.0 – Introduction

Environmental Impact Assessment

12. A formal request for an EIA Screening Opinion for the proposals as described has not been sought by the Applicant. The Council considers that the development proposals are Schedule 2 development as described in the EIA Regulations, being an urban development project, which exceeds the applicable thresholds/criteria (Category 10b, Urban Development Project).
13. Given the characteristics of the development, the location of the development, and the characteristics of the potential impact, it is the view of the Council that the proposed development constitutes EIA development. The Council notes that the Applicant does not dispute the need for EIA. An Environmental Statement is therefore formally required to be submitted as part of the planning application process.

EIA Background

14. The original version of the proposal was the subject of a Screening Opinion dated 6 June 2017 (re. S/1714/17/E1), which confirmed that an Environmental Impact Assessment (EIA) would be required.
15. A second version of the proposal was brought forward in 2020 and progressed as far as the receipt of a Scoping Opinion from South Cambridgeshire District Council (October 2020) ref. 20/03464/SCOP issued on 8 October 2020.

16. Further review of the scheme has resulted in a number of changes, including removal of the residential element and amendments to the red line and have resulted in this current Scoping Opinion request.

Policy Background

17. There are no statutory requirements concerning the form of the ES, and the EIA Regulations do not require a discussion of planning policy. The Council considers that an overview of the Development Plan context would be a useful and helpful addition to the ES, given the scope and nature of the development proposals.

18. Policy considerations should include reference to the South Cambridgeshire Local Plan (2018) and other material planning considerations including (but not limited to) the following:

- Greater Cambridge Shared Planning Sustainable Design and Construction SPD (2020).
- Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) and Site-Specific Proposals Plan (2012).
- Cambridgeshire and Peterborough Waste Partnership (RECAP): Waste
- Proposed Submission North East Cambridge Area Action Plan Regulation 19 (AAP) (November 2021).

19. Regard should also be had to the Council's Development Management Guidance in relation to planning applications prepared ahead of the adoption of the North East Cambridge AAP. This relates to evidence to support applications, a Transport Position Statement, and a technical note relating to odour impact for the Cambridge Water Recycling Centre (WRC). These documents are material planning considerations. In addition, there are a number of documents that should be referenced as part of the ES which are included in the relevant sections below.

Section 2.0 – Site Context

20. The site and its surroundings, and the scope of the proposed development is noted, and has been assessed on this basis.

Cultural Heritage

21. Within a 1.5km radius of the development area there are up to 10 grade I and II* buildings, as well as the Chesterton Abbey scheduled monument and five conservation areas (Baits Bite Lock in South Cambridgeshire, Fen Ditton in South Cambridgeshire, Riverside and Stourbridge Common in Cambridge, Ferry Lane in Cambridge and Chesterton in Cambridge).

Section 3.0 – Proposed Development

Quantum and Mix of Uses

22. This Scoping Response has been prepared on the basis of the

description of development as provided in Section 3.2 of the Scoping Report.

23. The development proposals would provide the following:

- c92,960sqm (GEA) of Class E floorspace (offices, laboratories and associated amenity and retail uses (mainly at ground floor level));
- a multi-storey Mobility Hub (of c1,031 spaces);
- a temporary car park (of c379 spaces)
- an area of “wild habitat” to provide part of the biodiversity net gain;
- the re-provision of an existing Network Rail compound;
- roads, cycle ways and pedestrian routes;
- areas of public realm; and
- drainage and other supporting infrastructure

24. The local planning authority reserves the right to consider whether any changes to the description of the development are material for scoping purposes.

Section 4.0 – EIA Methodology and Scope

Scoping

25. The submitted Scoping Report is considered to satisfy the Scoping Opinion information requirements Regulation 15 of the 2017 Regulations.

26. The proposed content and structure of the ES and supporting documents is noted. Whilst the approach to the ES is considered acceptable in principle, it is the Council’s opinion that further work will be required to a number of the sections of the ES. Each section of the response covers issues scoped out that need to be scoped in, or sections that require further clarification or expansion.

27. Whilst the development is situated within the administrative boundary of South Cambridgeshire District Council, it is very close to premises (including sensitive residential properties) that are located within the administrative boundary of Cambridge City.

28. The ES should recognise the trans-boundary nature of environmental impacts (particularly during the construction phases), which could have the potential to adversely affect residents across the administrative boundary.

29. Whilst paragraph 4.3 correctly refers to the proposal being of a type and scale that falls within Schedule 2(10) 'Infrastructure Projects' - specifically 10(b) 'Urban Development Projects' it is not correct in stating that the “development exceeds the applicable threshold of 150 dwellings and therefore constitutes Schedule 2 development” as no residential use is proposed in the proposals current form.

30. Table 4.1 refers to the PRS dwellings and maths college which no longer form part of the proposals.

Section 5.0 – Cumulative Effects

Introduction

31. The Council welcomes the consideration of in-combination effects of a development as well as inter-project cumulative effects.
32. The Council notes that there is no single agreed industry standard method with regard to cumulative impact assessment. The approach, which should be agreed with the local planning authority, should be appropriately focused and proportionate, following that set out in Planning Inspectorate's Advice Note 17 'Cumulative Effects Assessment Relevant to Nationally Significant Infrastructure Projects' (2015).

Approach

33. The schedule of projects to be considered within the cumulative assessment is agreed.
34. In addition, in accordance with established practice, the cumulative assessment should consider major development and infrastructure projects within at least a 2km radius of the application site, which have a reasonable prospect of coming forward before or at the same time as the proposed development.
35. Projects to be considered in the site search should include:
- Major developments with planning consent which are either under construction or have not yet commenced on site.
 - Major developments where a planning application has been submitted and information is in the public domain but the application has not yet been determined.
 - Major development proposals currently at Scoping stage.
36. The Council advises that the definition for major development should be that used within the Town and Country Planning (Development Management Procedure) (England) Order 2015, namely:
- “major development” means development involving any one or more of the following:
- (a) the winning and working of minerals or the use of land for mineral-working deposits;
 - (b) waste development;
 - (c) the provision of dwellinghouses where—
 - (i) the number of dwellinghouses to be provided is 10 or more; or
 - (ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);

(d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or

(e) development carried out on a site having an area of 1 hectare or more;

Methodology for Assessing Cumulative Effects

37. The Council welcomes the opportunity to further discuss the cumulative effects methodology (including the methodology for in-combination assessment).

38. The projects to be included within the EIA cumulative assessment, Stage 1 long list of 'other development and/or approved development' and Stage 2 short list of 'other existing development and/or approved development; should be agreed with the local planning authority in advance of application submission, as part of the pre-application discussions.

Section 6.0 – Air Quality

39. Whilst the site is not in an air quality management area with existing poor air quality, the Council agrees that the consideration of air quality impacts should be scoped into the ES for both construction impacts and operational impacts and welcomes the undertaking of an Air Quality Assessment (AQA).

Baseline Conditions

40. The Council agrees the general baseline conditions for inclusion however further details are set out below.

Potential Impacts

41. The construction and operational impacts are agreed.

Approach and Method

42. The scope of the assessment and the methodology should be agreed with the local planning authority as part of the pre-application discussions.

43. It is recommended that the air quality assessment is carried out in accordance with the following requirements:

- The AQA should include dispersion modelling for the current scenario (baseline) as well as future scenarios, with and without development inside and outside the development.
- The AQA should include a detailed assessment for the operational phase in response to the increased vehicle movements.
- Traffic data should be provided for the AQA. The data will be AADT with a breakdown by hour, day and vehicle type.

- The modelling should consider worst case future scenario.
 - As per IAQM Section 6.22.f we would encourage some monitoring prior to the AQA being undertaken at the earliest opportunity. This could be in the form of diffusion tubes located at roadside and key sensitive receptors. This can then be used to verify the modelling.
 - We would expect the roads to be included in the modelling to be agreed prior to the work being undertaken.
 - The AQA should take into account the cumulative impact of all planned development within the local area if applicable.
 - Results and finding of the assessment are subject to vehicle movements associated with the proposed development being approved by the Cambridgeshire County Council Transport Assessment Team.
 - The detailed methodology should be in accordance with the IAQM ‘Land Use Planning and Development Control: Planning for Air Quality (2017) or as superseded and the Greater Cambridge Sustainable Design and Construction SPD (2019).
44. More specific information on what we expect in terms of air quality assessment is included within the Greater Cambridge “Sustainable Design and Construction” SPD, (January 2020) and in particular ‘Section 3.6 – Pollution’. The document is available to view at the following link:
- <https://www.cambridge.gov.uk/greater-cambridge-sustainable-design-and-construction-spd>
45. In addition to an air quality assessment, a Low Emission Strategy should be submitted as part of the planning application in line with the requirements of the Greater Cambridge Sustainable Design and Construction SPD 2020. The LES should include sustainable transport measures to reduce transport related emissions.
46. It is noted that the list of references does not include the NEC AAP Environmental Health Topic Paper.

Section 7.0 – Climate Change

47. The inclusion of Climate Change, both in terms of construction and operation impacts for both greenhouse gas emissions and resilience, within the ES is welcomed.
48. Paragraph 7.16 makes reference to Cambridge City Council’s Climate Change Strategy and pulls out key element of the 2016-2021 strategy. This version of the strategy was replaced earlier in 2021 with the [2021-2026 Climate Change Strategy](#), which shares a vision for Cambridge to be net zero carbon by 2030, subject to Government, industry and regulators implementing the necessary changes to enable the city and the rest of the UK to achieve this. As such, paragraph 7.16 and other references to the Strategy in this section of the report

should be updated to reflect this new Strategy. It is also recommended that references to the City Council's Carbon Management Plan be removed as this document applies to Cambridge City Council assets only (for example at paragraph 7.21). Reference should also be included to South Cambridgeshire District Council's (SCDC) [Zero Carbon Strategy and Action Plan](#), which outlines how SCDC are supporting the district to halve emissions by 2030 and reduce them to zero by 2050, along with the outputs from the Cambridgeshire and Peterborough Independent Commission on Climate.

49. Under paragraph 7.17 it is recommended that a specific reference is included to the UK's Carbon Budgets, which are legally binding. Elsewhere in the document, notably at paragraph 7.61, reference is made to contextualising carbon emissions against local carbon budgets, an approach that would be welcomed. Use of the local authority carbon budgets provided by the Tyndall Centre, with carbon budgets available for both Cambridge City Council and South Cambridgeshire District Council is recommended.
50. Paragraph 7.18 makes reference to the Draft North East Cambridge Area Action Plan (2020) with reference to policy 2. It should be noted that this policy has now been amended in light of the Councils' Net Zero Carbon Evidence and includes specific policy requirements to ensure that development at NEC achieves net zero carbon, from an operational emissions perspective. As such, references to the Area Action Plan should be updated throughout the document to take account of the updated Proposed Submission version of the Area Action Plan published in 2021, which is now available on the Shared Planning Services [website](#).
51. Paragraph 7.21 should also make reference to the Cambridge Local Plan (2018) and the Proposed Submission version of the North East Cambridge Area Action Plan.
52. Table 7.1 provides historic weather data from the Met Office Weather Station at the NIAB site. Given the built-up nature of the Cambridge North Site, it may be more appropriate for weather data from the Met Office Weather Station at Cambridge Botanic Garden to be used, which would be more reflective of the conditions that the site is likely to experience. At the very least, a comparison between the data from the two stations should be undertaken.
53. Table 7.2 outlines the potential greenhouse gas impacts to be scoped into the assessment. On the whole, the elements scoped in are welcomed. However, the example included in this table references carbon emissions associated with regulated energy. The assessment must also include carbon emissions associated with unregulated energy as part of the operational emissions, a critical element of achieving net zero carbon, and it would be helpful to have confirmation that this will be included in the scope.
54. Table 4.2 states that utilities and water resources will be scoped out of the assessment. The Greater Cambridge area is now classified as being in severe water stress, and updated evidence that the Planning Service now has on water resources as part of the Integrated Water Management Strategy for the Greater Cambridge Local Plan highlights the need for the highest levels of water

efficiency in all new developments to help ensure long terms sustainable water supplies. Given the scale of the proposed development the issue of water resources should be scoped into the assessment.

55. The list of references does not include the NEC AAP Climate Change, Energy, Water and Sustainable Design and Construction Topic Paper which are pertinent to this issue.

Section 8.0 – Cultural Heritage

56. The Council agrees that Cultural Heritage should be scoped into the ES as per our advice in the previous scoping opinion response. The scope of the cultural heritage assessment is confined to the potential effects on the setting of designated heritage assets in the surrounding area. The impact of the proposal on archaeology has been scoped out.
57. The ES should consider the potential impacts on any grade I, II* and II listed buildings, Scheduled Monuments and Registered historic parks as well as non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place given the scale height and massing of the proposal further thought should be given to the recent advice and guidance on tall buildings. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) and relevant local authority staff.
58. Due to the nature of the proposed use and the surrounding townscape character the proposed development could be visible across a large area and could, as a result, affect the significance of heritage assets at some distance from this site itself. Of primary concern is the impact of the development upon the significance of the designated heritage asset within the area surrounding the development. Within a 1.5km radius of the development area there are up to 10 grade I and II* buildings, as well as the Chesterton Abbey scheduled monument and five conservation areas (Baits Bite Lock in South Cambridgeshire, Fen Ditton in South Cambridgeshire, Riverside and Stourbridge Common in Cambridge, Ferry Lane in Cambridge and Chesterton in Cambridge). It is expected that the assessment will clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed. It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this.
59. The baseline LVIA is supplemented with heritage specific viewpoints (both photographs and photomontages) that illustrate the ES and support the results of the heritage assessment. If these are to be presented in the Landscape and Visual chapter, then the assessment needs to be clearly set out and cross referenced with the heritage chapter. The setting of heritage assets is not however just restricted to visual impacts and other factors should also be considered in particular noise, light, traffic and assessments. Where relevant, the

cultural heritage should also be cross-referenced to other relevant chapters, and as above we advise that all supporting technical heritage information is included as appendices. The Heritage Impact Assessment Study Area should also include assets that could be affected by development, such as Horningsea Conservation Area, Baits Bite Lock and assets in Cambridge City Centre. The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits and can also lead to subsidence of buildings and monuments.

60. The assessment will need to be carried out in accordance with established policy and guidance, including the National Planning Policy Framework, the Planning Practice Guidance and Historic England's Good Practice Advice. Whilst standardised EIA matrices are considered in some planning practices to be useful tools, it is considered the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems. It is recommended that these should be in an appendix and seen only as material to support a clearly expressed and non-technical narrative argument within the cultural heritage chapter. The EIA should use the ideas of benefit, harm and loss (as described in NPPF) to set out 'what matters and why' in terms of the heritage assets' significance and setting, together with the effects of the development upon them.
61. It is noted that the reference list does not include the Heritage Impact Assessment (includes Archaeology), Townscape Assessment, Townscape Spatial Framework Review, and Townscape Strategy

Section 9.0 - Ecology

62. The Council agrees that ecology should be scoped into the ES due to the scale of habitat loss and density of the proposed development.

Baseline Conditions

63. The Council is satisfied that 'open mosaic habitat' (OMH) has been appropriately identified, providing planning weight as both a UKBAP habitat and habitat of principle importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.
64. In terms of the ongoing survey effort on site, some of the habitat and protected species surveys cited are over 2 years old and will require updating to inform the EIA.

Potential Impacts

65. The potential impacts and topics to be scoped into the Ecology Chapters of the EIA are agreed.

66. The topics identified as likely not to have significant effects and therefore to be scoped out of the Ecology Chapters of the EIA are agreed.

Approach and Method

67. The proposed approach and method is generally supported. The Applicant is reminded that all specialist species surveys should be undertaken by a suitably qualified ecologist within the appropriate survey season.

68. The term 'wild habitat' used in the Scoping Opinion report requires further definition to enable a full understanding of the proposed habitat types, long term management and status.

69. The 'wild habitat' identification as a sensitive lighting receptor is supported and it is requested that Bramblefield's LNR be considered in this category.

70. The proposed 10+ % BNG ambition for the site is supported. The proposed use of extensive biodiverse roof is supported, however, their suitability for many invertebrate groups associated with OMH requires consideration and may dictate the ultimate habitat condition scores within the BNG metric. This should be explored further with officers in pre-application consultation.

71. Cumulative ecological effects of wider proposed AAP should be considered, particularly with regard habitat connectivity.

Section 10.0 – Flood Risk and Drainage

72. The Council agrees that the consideration of flood risk and drainage impacts should be scoped into the ES.

Flood Risk Assessment (FRA)

73. The approach and method of the FRA is supported.

Surface Water Drainage Strategy (SWDS)

74. Water quality requirements for development would need to be in accordance with CIRIA SuDS Manual and adequate water quality treatment would need to be provided through the use of SuDS for all areas of new hardstanding relative to their type and use. Appropriate pre-treatment would need to be applied to any incoming flows. Interception storage would be required for the impermeable surfaces. This would need to be provided close to where the rain falls at plot level in features such as green/brown roofs, raingardens, permeable paving, and other vegetated features.

75. The general principles of surface water drainage as outlined within the Scoping Report are acceptable.

76. The SWDS should include the following:

- How the proposed surface water drainage scheme has been determined following the drainage hierarchy.
- Pre-development run off rates.
- Post development run off rates with associated storm water calculations.
- Discharge location (s).
- Drainage calculations to support the design of the system.
- Drawings of the proposed surface water drainage scheme including sub catchment breakdowns where applicable.
- Maintenance and management plan of the surface water drainage system (for the lifetime of the development) including details of future adoption.

77. It should be demonstrated as part of the SWDS that the requirements of any local surface water drainage planning policies have been met, and the recommendations of the relevant Strategic FRA and Surface Water Management Plan have been considered.

78. In addition to the requirements of the Cambridgeshire Flood & Water Supplementary Planning Document (SPD) the assessment should also consider the following specific guidance on the preparation of SWDS:

<https://www.cambridgeshire.gov.uk/asset-library/Surface-Water-Planning-Guidance-June-2021.pdf>

79. Constructions or alterations within an ordinary watercourse (temporary or permanent) require consent from the Lead Local Flood Authority under the Land Drainage Act 1991. Ordinary watercourses include every river, drain, stream, ditch, dyke, sewer (other than public sewer) and passage through which water flows that do not form part of Main Rivers (Main Rivers are regulated by the Environment Agency).

80. The Applicant should refer to Cambridgeshire County Council's Culvert Policy for further guidance:

<https://www.cambridgeshire.gov.uk/business/planning-and-development/water-minerals-and-waste/watercourse-management/>

81. Surface water and groundwater bodies are highly vulnerable to pollution and the impact of construction activities. The risk of pollution (particularly during the construction phase) should be considered and mitigated appropriately. Flow within the watercourse is likely to vary by season and it could be dry at certain times throughout the year. Dry watercourses should not be overlooked as these watercourses may flow or even flood following heavy rainfall.

82. It is noted that this section does not include a reference list and therefore does not reference the Integrated Water Management Study – Strategic Flood Risk Assessment, NEC AAP Area Flood Risk Assessment, Surface Water Attenuation Report, Surface Water Drainage Core Principles and Phase 1 Geo-Environmental Desk Study. These documents should be considered as part of the assessment.

Section 11.0 – Human Health

83. The Council welcomes the commitment to undertaking a combined Health and Environmental Impact Assessment (HEIA).

Baseline Conditions

84. The Council supports the breadth of baseline conditions for inclusion.

Potential Health Impacts and Approach

85. The Council agrees that it would be advantageous for the report to explore the impacts on health and wellbeing of the wider determinants, both individually and together as stated in Paragraph 11.2. The scope listed in Table 11.1 is agreed.

Methodology

86. Para 11.5 of the Scoping Opinion Report includes, at bullet point 3, a number of wider health determinants, but the following NEC AAP evidence documents relating to them have not been referenced in para 11.7 including: Health and Wellbeing Topic Paper; Open Space and Recreation Topic Paper; Environmental Health Topic Paper, Anti-Poverty and Inequality Topic Paper; Skills, Training and Local Employment Opportunities Topic Paper; Community Safety Topic Paper and Transport Topic Paper.

87. It is noted at para 11.34 efforts were made to try to contact the Cambridgeshire and Peterborough Clinical Care Group. It is recommended that contact is made with the NEC AAP Health Sub-Group.

Section 12.0 – Landscape and Visual, including Appendix 2 Landscape and Visual Impact Assessment (LVIA) Baseline

88. The Council confirms that a LVIA is required as part of the application and should be included in the Environmental Statement.

89. The Council welcomes the opportunity for further discussion on the final viewpoints as part of the pre-application discussions. This will provide an opportunity to refine the exact location of the proposed viewpoints, as well as discuss the potential inclusion of additional viewpoints to broaden the understand of the impact of the development on the approach to and setting and identity of the City.

90. The LVIA should consider both landscape and townscape effects, including important historic assets and their settings. Due to the edge of city site location, this should include the Cambridge skyline.

91. The LVIA should be supplemented with heritage specific viewpoints (both photographs and photomontages) that illustrate the ES and supports the results

of the heritage assessment. The assessment should be clearly set out and cross referenced with the heritage chapter.

Section 13.0 Lighting

92. When comparing the existing site and its lighting environment against the proposed development's associated lighting requirements, by virtue of the nature, size and location of the proposals there will be an increase in the lighting levels witnessed on site, resulting in a change in the existing lighting environment.
93. It is accepted the assessment of artificial lighting that will be required for the development cannot be completed at this time due to lack of final details. It is welcomed that an assessment will however be undertaken when detailed design information becomes available.
94. It is accepted that temporary lighting used during the construction phase be scoped out of the assessment due to the transient nature of construction lighting requirements. Construction lighting levels etc will be determined by health and safety requirements, but should unnecessary obtrusive light be encountered, there remains potential statutory nuisance action that can be taken by the local authority(s) if necessary to provide adequate protection to existing residents.

Section 14.0 – Noise and Vibration

95. The Council agrees that the consideration of noise and vibration impacts should be scoped into the ES.
96. Appropriate assessment methodologies should be selected for the various types of noise experienced from existing industrial premises including BS4142:2014 + A1:2019, World Health Organisation (WHO) Community Noise Guidelines and WHO "night noise guidelines for Europe".
97. Impacts from the Cambridge North Station on the proposed development will need careful consideration. Rail noise will also be an important consideration at this location. The noise impacts of the Cambridge Guided Busway on sensitive premises on the new development (e.g. laboratory buildings) will need careful assessment.
98. The references to statutory, government and industry best practice / guidance, technical standards, codes of practice and the national planning policy framework (NPPF) relating to noise are noted and detailed reference to important European / National Legislation, regulations and guidance should be included with summaries of their aims, principles, scope and purpose.
99. The use of the standards included in the scoping report for the prediction and assessment of all construction and operational noise and vibration impacts from all noise and vibration sources are appropriate and we welcome the submission of a full noise report/assessment to be submitted with the ES.

100. It is recommended that all noise sources are considered e.g. general anonymous environmental noise sources - road traffic, compared to commercial, industrial trade and businesses (that are not anonymous noise sources).
101. It will need to be demonstrated that adverse impacts have been sufficiently minimised. This may include the consideration of environmental noise barriers in the form of acoustic fence / barrier running continuously along the entire development site boundary possibly between any adjacent existing industrial areas or transport routes. The final height and length of such environmental noise barriers could only be finalised by detailed noise modelling but to be effective it would have to be of such a height to block the direct line of sight to proposed sensitive properties. However, in considering such barriers, constraints such as existing access roads / tracks and the presence of surface water attenuation ponds / drainage features would need consideration. Additionally, care should be taken when considering such mitigation to ensure the envisaged measures do not make for an unsatisfactory development in other planning respects in terms of urban design or visual impact requirements or loss of open space provision etc.
102. Care should be taken when considering noise mitigation measures to ensure the envisaged measures do not make for an unsatisfactory development in other planning respects in terms of urban design or visual impact requirements etc.
103. The references to statutory, government and industry best practice / guidance, technical standards, codes of practice and the national planning policy framework (NPPF) relating to noise are noted. Detailed reference to relevant European/National Legislation, regulations and guidance should be included with summaries of their aims, principles, scope and purpose. Reference should be made to the NEC AAP Noise Model and Mitigation Assessment, Technical Note on examples of noise mitigation or the Environmental Health Topic Paper.

Section 15.0 – Odour

104. As there are no sources of odour associated with the proposed development and based on the technical note produced by Cambridge City Council (CCC) for the Cambridge Water Recycling Centre (CWRC), located adjacent to the proposed development, it is proposed that an odour assessment is scoped out of the EIA. The Council agrees that odour is scoped out of the ES. However, in line with the CCC technical note an odour statement should be produced to accompany the application. The odour statement should outline the suitability of the site for the proposed uses in relation to odour emissions from the CWRC. Although there is some concern that odour has been scoped out, it is acknowledged that the CCC Technical Note indicates development of the type proposed would likely be acceptable and on this basis the scoping out of odour is agreed.
105. Notwithstanding this, the Technical Note provides the necessary detail to inform any decision taker as to acceptability of development in this area due to

predicted odour impacts from the CWRC. Due to the distance and orientation to the CWRC, from initial information available, odour impacts are predicted to be low for this development phase and the suggested provision of an odour note justifying the application with regard to odour would be welcomed.

106. It is noted that the majority of the main site is outside of the area where odour constraints are conferred by the CCC Technical Note. However, it is still within the 400m safeguarding area around the CWRC and some of the proposed development does fall within the 3 and 5 odour unit contours, but only for proposed medium and low sensitivity uses. It is agreed that planning guidance contained in the latest version of the Technical note on interpretation of 'Odour Impact Assessment for Cambridge Water Recycling Centre' Report / Study (Odournet, October 2018 – ref. CACC17A_08_final) as a material consideration in determining Planning Applications in the vicinity of Cambridge Water Recycling Centre (CWRC) indicates this type of development is likely to be acceptable.

Section 16.0 – Socio Economics

107. The Council agrees that the consideration of socio-economic impacts should be scoped into the ES. The Baseline Conditions mentions the North East Cambridge Area Action Plan and its evidence base, but does not specify what evidence. Many of the evidence documents in Section 11.0 above will also be relevant to this section. In addition, the Employment Topic Paper will be relevant as well as Mixed Use development: Overcoming barriers to delivery, Cultural Place Making Strategy and Community & Cultural Facilities Audit Provision, and Retail Town Centre Evidence Study.

Section 17.0 – Soils and Groundwater

108. The Council agrees that the consideration of soil and groundwater impacts should be scoped into the ES. Due to the potentially contaminative previous uses on the site that could lead to ground contamination, a detailed assessment will be required. This is to be produced after consultation with SCDC.
109. Contaminated land should be considered and assessed in accordance with government / industry best practice and technical guidance and the 'Greater Cambridge Sustainable Design and Construction Supplementary Planning Document, Adopted January 2020'. However, this section does not include a Reference List and therefore does not reference the NEC AAP Phase 1 Geo-Environmental Desk Study, Surface Water Attenuation Report, and Surface Water Drainage Core Principles.
110. Due to the potentially contaminative previous uses across the development site, a detailed contaminated land investigation will need to be carried out. Any such assessment should be undertaken in a phased manner, beginning with a Phase 1 Desktop Study detailing the environmental settings and historical land uses of the development site and surroundings in order to construct a preliminary Conceptual Site Model and risk assessment upon which a Phase

(intrusive) site investigation can be designed and carried out.

Section 18.0 – Transport

111. The Council agrees that the consideration of traffic and transportation impacts should be scoped into the ES.
112. The ES should include a full Transport Assessment (TA) to understand the likely impacts of the development on the highway. Details of mitigation should be provided as part of these assessments. The TA will need to address the trip budget for the site as part of the transport mitigation.
113. The TA should demonstrate that the development would not compromise opportunities for the redevelopment of the wider North East Cambridge area.
114. Highways and transport officers at Cambridgeshire County Council have had discussions with the Applicant. It is an expectation that further discussions will take place as part of the pre-application planning process, and that the scope and content of the TA will be agreed by the local planning authority in consultation with the Highway Authority.
115. It is noted that the reference list for this section does not make reference to the NEC AAP Transport Evidence Base and High Level Transport Strategy.
116. Regard should be had to the scoping advice offered by Highways England dated 21 December 2021, and the concerns relating to potential impacts of the development upon the Strategic Road Network (SRN), especially the junction on A14/A10.
117. Generated traffic flows and their trip distribution to/from the development site to the A14 (which is part of the Strategic Road Network) should be provided, to ensure that there would be no adverse safety implications or material increase in queues and delays on the SRN during construction and operation.
118. Any Transport Assessment in relation to the SRN should be undertaken in accordance with the Department for Transport Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development. Reference should also be made to 'The Strategic Road Network: Planning for the future (A guide to working with Highways England on planning matters) and National Planning Practice Guidance.
119. It is noted that the cited Guidelines for the Environmental Assessment of Road Traffic, 1993 does not consider the impact on cyclists. Considering the high number of cyclists in Cambridge, cycling should be formally recognized as a significant mode of transport. Cyclist Severance, Cyclist Delay and Cyclist Amenity should be added to the list of relevant impacts to be assessed.
120. Cambridge North railway station should be included as a location containing "High" sensitivity receptors.

Section 19.0 - Wind

121. The Council agrees that the consideration of wind should be scoped into the ES. The potential impacts identified are agreed and the approach and method is acceptable.

Section 20.0 – Proposed Structure of ES

122. It is an expectation that EIA Monitoring Arrangements will be included within the ES, including any proposed monitoring arrangements (for example the preparation of a post-project analysis), which should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, for both the construction and operational phases

Appendix A

List of Consultees

In accordance with Regulation 15 of the 2017 Regulations, the following statutory consultees were notified of the Scoping Request:

- **Environment Agency**
- **Natural England**

In addition, consultations were also requested from the following:

- **Greater Cambridge Shared Planning Service:**
 - Conservation and Design
 - Landscape
 - Nature Conservation
 - Sustainable Drainage
 - Urban Design
 - Planning Policy
 - Sustainability
- **Greater Cambridge Shared Waste**
- **South Cambridgeshire District Council**
 - Environmental Health
 - Sustainable Drainage
 - Community Development
- **Cambridge City Council**
 - Environmental Health
- **Cambridgeshire County Council:**
 - Highways
 - Archaeology
 - Growth and Economy
 - Local Flood Authority
- **Cambridgeshire Wildlife Trust**
- **Anglian Water**
- **Cambridge Water**
- **Cambridge Past, Present and Future**

- **Highways England**
- **Historic England**
- **RSPB**
- **Milton Parish Council**
- **National Grid**