

Appendix C – Internal Consultations

Cambridgeshire County Council (CCC)

The County Council's formal response was approved by the Economy and Environment Committee at meetings on 5 February 2015 and 10 March 2015, and by the Chair and Vice Chair under delegated authority regarding certain matters.

TRANSPORT COMMENTS

The overall approach that the developer has taken to developing the transport strategy in terms of the proposed location and types of land use to minimise travel, the provisions for walking and cycling, public transport measures, and travel planning, followed by highway engineering measures that seek to mitigate residual traffic impacts, is welcomed. In particular it is important that the development brings forward attractive walking and cycling routes on-site, and provides attractive walking and cycling facilities to external destinations.

As with any significant development, there are a large number of transport matters that require further exploration. The current key matters identified by officers are set out below.

Transport Modelling

Overall it is considered that the applicant has applied a thorough approach to considering the transport impacts of the Phase 2 development in terms of modelling. This has included undertaking a benchmarking exercise to compare base year Cambridge Sub-Regional model (CSRM) predictions with observations, and some adjustments to further improve the model.

Although the approach to modelling is considered thorough, it does require further verification and cross referencing to give comfort that the outputs are reasonable and correlate with other models and approaches including some 'first principles' checks.

In addition, further review of modelling undertaken by the Highways Agency (HA) in connection with the A14 Huntingdon to Cambridge scheme, is required to ensure a consistent understanding of the two sets of proposals.

The modelling has been undertaken to give an indication of the predicted traffic flows, and use of other transport modes, associated with the development and hence provides a basis for determining what mitigation measures are required.

Highway Access Strategy

Modelling shows that development of Phase 2 can only happen with delivery of the HA's A14 Huntingdon to Cambridge scheme.

The modelling also suggests that, for Northstowe Phase 2, suitable highway access capacity can be provided via a combination of:

the northern signalised access on the B1050 proposed for Northstowe Phase 1; and a new single carriageway southern access road connecting to a new roundabout on the B1050, together with a dual carriageway connection from that roundabout to an improved A14 Bar Hill Interchange (as proposed by the HA).

It is proposed that in Phase 3 that the southern access road west would be upgraded to dual carriageway, and that a southern access road east linking to Dry Drayton Road, would be provided.

The suitability of this proposed highway access strategy can only be confirmed when officers have fully reviewed all of the model outputs submitted by the applicants within their Transport Assessment, including potential additional sensitivity tests to further demonstrate the robustness of the analysis.

In addition to the above analysis, there will also be a need for a detailed engineering review of all of the proposals, including road safety audits, before any highway access strategy can be confirmed as technically acceptable.

Unguided bus only road through the site

In addition to new highways, the applicant is also proposing to construct a new length of unguided bus only road which would pass through the site. This is in line with the Area Action Plan (AAP) proposals and is therefore welcomed. However one key matter for further discussion is that there are interim proposals for around 700m of this route to be shared by buses and general traffic. This would then revert to dedicated use once Phase 3 is delivered.

Further consideration needs to be given to this proposal as the AAP aspires to provide a dedicated busway for the end-state Northstowe and, as a result, this needs to be discussed further with the applicant. Whilst it might be possible to introduce this as an interim measure, it could potentially be difficult to remove it, and return the road to buses only if required at a later date. Buses could also be subject to delays. Measures will be required to ensure that buses are not delayed. Further consultation and work with the applicant has resolved this issue to agree that monitoring and a back stop date can be agreed to ensure temporary provision for dual use and to ensure no delays ensue to public transport. No access to a neighboring plots to be accessed directly from busway, secured through condition.

Parking Provision

Car and cycle parking provision is another area for further discussion. Officers' initial reaction is that residential car parking levels as currently proposed may be too low overall although it is recognised that a balance needs to be struck between over-providing (and potentially encouraging car use) and providing adequate provision whilst seeking to encourage use of other modes. Prior to amendment the application proposed an average of 1.5 car parking spaces per household, this was considered insufficient with an average of 2 spaces per household perhaps more suitable and in line with the emerging policy. Given the issues and problems that have been experienced in sites elsewhere in the County there was Member support for seeking higher levels of residential parking spaces in Northstowe Phase 2. In addition, there needs to be careful consideration of the design of residential car parking, including the ability of residents to park cars within the curtilage of dwellings and garages of a size that cars can be parked in them. Particular consideration needs to be given to residential car parking in the town centre and that sufficient and accessible parking spaces are provided. Further work with the applicant has now agreed an average of 1.75 spaces per dwelling over phase 2 and the applicant has provided a detailed evidence base to support this being appropriate provision. The applicant has also agreed that the use of car parking courts will not be a design feature. This has enabled the county to withdraw its holding objection to the application.

In addition, a detailed strategy with supporting analysis is required for the town centre parking allocation to ensure that a balanced provision is made that both encourages non-car access, but also ensures the town centre remains viable through adequate car parking being provided.

Initial reviews also suggest that the proposed levels of cycle parking may be inadequate, particularly for households. This is also below emerging policy and is a key element in enabling residents to own and use a bicycle.

Other Measures

The Transport Assessment sets out a range of proposed highway and non-highway measures including some local highway schemes, public transport provision including enhanced bus services, and new and improved walking and cycling routes that would accompany the full development. These all require further detailed assessment by County officers.

Cycling Provision

Cycling provision is essential in order to encourage people to use sustainable modes of transport rather than cars. It is important that cycling provision is considered and designed in from the start in order to maximise the opportunities and that Phase 2 adopts or exceeds the exemplar standards in phase 1.

Summary of Key Issues

- A number of general modelling clarifications relating to further analysis of the CSRM model outputs including the performance of the model after benchmarking, consideration of impacts on the B1050 corridor, reassurance on the consistency of traffic flow forecasts prepared by the HA for the A14 scheme and outputs from the Northstowe modelling, together with some further comparing of model outputs with other data and comparison with a basic first principle's approach.
- Reassurance on the approach to highway design, and the implementation and co-ordination of improvements to the B1050 to be delivered by the HA at the A14 Bar Hill interchange, and the proposed dual carriageway up to and including the roundabout at the western end of the proposed Southern Access Road (West).
- Further discussion on the detailed modelling and design of the Southern Access Road (West) junctions to ensure that they accommodate expected traffic flows and provisions for cyclists.
- The potential need for sensitivity tests to be undertaken for key junctions, particularly including those on the B1050 where there is an early traffic peak, and at other locations if required.
- Bus-related matters including the proposed interim shared use treatment of the busway. Further discussion is also required regarding the level of CGB bus service, and other local bus services, that would need to accompany the development together with the location of bus stops.
- Concern that the provision of car parking for residential uses may be insufficient, and that provision in the town centre needs to be appropriate. Further detail is needed about the demand for, and the amount and location of, residential and town centre car and cycle parking.
- Further discussion is required regarding the amount and location of cycle parking for dwellings, the width and design of cycle routes along all roads and the busway, and east west links particularly to the town centre.

- Further details are required of the cross section and layout of the link road (west) as well as the busway, primary streets and secondary streets.
- Further discussion is required over the use of swales, particularly their profile, depth, restraint for vehicles, pedestrian crossing places, access to dwellings and street layout for parking, pedestrians and cyclists.
- Concern that the target for car trips in the Travel Plan may be too high, and that not enough prominence has been given to the role of alternative modes of travel to and from Northstowe. The travel plan targets could be more ambitious, and its implementation and monitoring would need to be linked to the travel plan for Phase 1. Details on the location of car club bays and operator, and the need to provide for a higher proportion of internal cycle trips particularly to schools and the town centre will need further discussion.
- Details of the committed improvements to the Public Rights Of Way network are limited and it is considered need to include more measures. These need to be discussed further, particularly with a view to establishing that the correct destinations and route types are proposed for improvement. This is likely to result in a request for additional connections or provision for users to be provided, and is the subject of ongoing discussion with other stakeholders.
- Further details are required on the future Airfield Road, its method and timing of closure, enforcement of its use, and design of its junction with the access road into Northstowe.
- Further discussion is also required with regards to agreeing the proposed off-site transport mitigation measures. These range from levels of bus service required and associated financial support, to the adequacy of the highway access strategy discussed above. In terms of local impacts and how potential local increases in traffic flows might be mitigated, these include proposals for Willingham crossroads, potential traffic calming of Ramper Road between Longstanton and Swavesey, and proposals for Rampton Road between Willingham and Rampton. In terms of cycle network enhancements, further discussion is also required on improvements to cycle access to Northstowe from Swavesey, Over, Cottenham, Rampton and Girton.

In summary there has been significant progress on the application and following submission of formal amendments and discussion with the applicant the County Council is now in a position to withdraw the holding objection on Phase 2. There are still areas of detail to be worked upon but consider that this can be dealt with through condition or legal agreement.

Sustainable Drainage Systems (SuDS)

The Lead Local Flood Authority have a watching brief regarding SuDS at this moment in time. The Environmental Statement and FRA/Drainage Strategy predominantly focus on flood risk and pollution control there is little emphasis on how this is to be integrated into the outdoor space. Access to SuDS features and an understanding on their purpose are important across the site as well as good integration into the urban landscape. Additionally there did not appear to be an indicative SuDS layout with estimated storage at each location other than waterpark, further detail should be worked up early on to demonstrate that these elements can be brought into the overall design of the development without being lost amongst other site requirements.

The section on future maintenance and adoption is unclear at the moment, this should be clearly set out particularly due to the interlinking with the first phase of the water

park. Anglian Water should be approached as soon as possible to establish whether they will consider adopting the second phase of the strategic SuDS infrastructure. Overall there is a need to ensure that run off from new developments is carefully managed so that surface water flood risk is not increased in surrounding areas or water quality reduced to nearby water bodies.

Informative

Please note any ordinary watercourses including those with award status within the site which require certain works (e.g. diversions and/ or culverting) will require prior written consent from Cambridgeshire County Council under the Land Drainage Act 1991. This is irrespective of any planning permission given. Failure to obtain such consents may result in Enforcement action.

MINERALS AND WASTE & STRATEGIC WASTE COMMENTS

Planning Statement

The policy review in the Planning Statement omits any mention of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy (July 2011) and Site Specific Proposals Plan (Feb 2012). Both have policies, allocations and designations which are directly relevant to Northstowe Phase 2, and which need to be reflected in the development's Construction Environmental Management Plan (CEMP) and the Waste Strategy.

Environmental Statement, Waste Strategy and CEMP

Although the Waste Strategy acknowledges the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy (July 2011), unlike the planning statement, it is worth noting that both waste planning policy (including supplementary planning documents) and waste disposal (including the provision of household recycling centres) is the responsibility of Cambridgeshire County Council (CCC). At present CCC provides 9 household recycling centres (HRCs) rather than the 10 referred to within Paragraph 4.2.1.7. South Cambridgeshire District Council is responsible for the waste collection within Cambridgeshire which includes Bring Sites. At present the Waste Strategy does not appear to make this distinction.

The preparation of a Soil Resources Survey and Plan, the latter of which will be linked to the CEMP is welcomed. It is also noted that a Materials Management Plan detailing the strategy for the re-use of soils will be prepared.

Construction, Demolition & Excavation (CD&E) Waste Arising – an accurate estimation of construction waste has not been given at this stage, pending the decision on what types of construction methods will be used. Benchmarking has therefore been done. Similarly a pre-demolition audit of the existing buildings to be demolished has not been completed, so it has not been possible to accurately estimate demolition waste arising from these sources. This means that figures in the Environmental Statement, Waste Strategy etc. are based on general assumptions rather than detailed forecasts related to this development. Firm arising figures for the different inert waste streams are necessary for the waste audit and strategy, CEMP, and Site Waste Management Plan (SWMP) to be effective. It is noted that the latter will be a living document and will also contain waste forecasts. The Waste Strategy states that it includes a preliminary SWMP (Appendix b). However, this is an outline of what might be included in a SWMP rather than a detailed SWMP. The forecasts of

inert waste arisings should be refined as soon as possible, and be reflected in the detailed CEMP and SWMP's that are proposed for each separate phase of the development. This should be secured by planning condition.

Inert Waste Management Measures – the application and detailed proposals do not mention or include the provision of the temporary waste management facility required by Policy CS28 of the Cambridgeshire and Peterborough Core Strategy (adopted July 2011). Policy CS28 identifies the need to maximise the re-use, recycling and recovery of inert waste streams from construction and demolition and requires all strategic development (and it specifies Northstowe) to have temporary inert waste recycling facilities in place throughout their construction phases. A corresponding allocation is made in the Cambridgeshire and Peterborough Site Specific Proposals Plan (adopted February 2012) for an Area of Search for this facility (SSP Policy W1T). This needs to be taken forward, and secured by a planning condition. The temporary inert waste recycling facility will be key in facilitating the delivery of sustainable construction waste management for the development, and any associated aspirations which will be set out in the supporting SWMP, Waste Strategy and CEMP (site wide and for the following phases) for Northstowe Phase 2.

Operational Waste – although it is the strategic service that CCC will be considering when assessing this Phase 2 application, the continued commitment to the delivery of the Northstowe HRC is welcomed. However, whilst the acknowledgement of the HRC service is welcomed, we are concerned that although Paragraph 6.2.3.1 of the Waste Strategy acknowledges that 'phase 2 will be expected to make a financial contribution to this facility' the RECAP Contributions Assessment as part of the RECAP Tool Kit shown on pages 53 and 54 of the Waste Strategy states that it is not relevant and reference should be made to the S106 Heads of Terms for Phase 1 where land has already been provided. As early discussions have been in line with the statement made within Paragraph 6.2.3.1 we expect the toolkit to be updated as appropriate.

Suggested Conditions

Site Waste Management Plan and Waste Audit

Prior to the commencement of development a full Site Waste Management Plan and Waste Audit must be submitted in writing and approved by the Local Planning Authority. This shall include details of:

- a) Construction waste infrastructure including an inert waste management facility to be in place during all phases of construction;
- b) Anticipated nature and volumes of waste and measures to ensure the maximisation of the reuse of waste;
- c) Measures and protocols to ensure effective segregation of waste at source including waste sorting, storage, recovery and recycling facilities to ensure the maximisation of waste materials both for use within and outside the site;
- d) Any other steps to ensure the minimisation of waste during construction;
- e) The location and timing of provision of facilities pursuant to criteria a/b/c/d;

- f) Proposed monitoring and timing of submission of monitoring reports;
- g) The proposed timing of submission of a Waste Management Closure Report to demonstrate the effective implementation, management and monitoring of construction waste during the construction lifetime of the development;
- h) A RECAP Waste Management Guide toolkit, including a contributions assessment, shall be completed with supporting reference material;
- i) Proposals for the management of municipal waste generated during the occupation phase of the development, to include the design and provision of permanent facilities e.g. internal and external segregation and storage of recyclables, non-recyclables and compostable material; access to storage and collection points by users and waste collection vehicles is required.

The agreed Site Waste Management Plan shall be implemented.

Reason: To ensure that waste arising from the development is minimised and that which is produced is handled in such a way that maximises opportunities for re-use or recycling in accordance with Policy CS28 of the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) and Policy DP/6 of the South Cambridgeshire District Council Development Control Policies DPD (2007).

Phase Specific Construction Environmental Management Plans

A phase specific Construction Environmental Management Plan (CEMP) shall be submitted and approved for each phase of the development hereby permitted. Each phase specific CEMP shall accord with and give effect to the waste management principles set out in the adopted Cambridgeshire & Peterborough Minerals and Waste Core Strategy (2011) and Waste Hierarchy.

Each shall address the following aspects of construction:

- a) A construction and phasing programme;
- b) Contractors' access arrangements for vehicles, plant and personnel including the location of construction traffic routes to, from and within the site, details of their signing, monitoring and enforcement measures, along with location of parking for contractors and construction workers;
- c) Construction hours;
- d) Delivery times for construction purposes;
- e) Soil Management Strategy including a method statement for the stripping of top soil for re-use; the raising of land levels (if required); and arrangements (including height and location of stockpiles) for temporary topsoil and subsoil storage to BS3883:2007;
- f) Noise monitoring method including location, duration, frequency and reporting of results to the LPA in accordance with the provisions of BS 5228 (1997);
- g) Maximum noise mitigation levels for construction equipment, plant and vehicles;
- h) Vibration monitoring method including location, duration, frequency and reporting of results to the LPA in accordance with the provisions of BS 5228 (1997);
- i) Setting maximum vibration levels at sensitive receptors;
- j) Dust management and wheel washing measures to prevent the deposition of debris on the highway;
- k) Site lighting;
- l) Drainage control measures including the use of settling tanks, oil interceptors and

- bunds;
 - m) Screening and hoarding details;
 - n) Access and protection arrangements around the site for pedestrians, cyclists and other road users;
 - o) Procedures for interference with public highways, (including public rights of way), permanent and temporary realignment, diversions and road closures;
 - p) External safety and information signing and notices;
 - q) Liaison, consultation and publicity arrangements including dedicated points of contact;
 - r) Consideration of sensitive receptors;
 - s) Prior notice and agreement procedures for works outside agreed limits;
 - t) Complaints procedures, including complaints response procedures
- Membership of the Considerate Contractors Scheme;
- u) Location of Contractors compound and method of moving materials, plant and equipment around the site.

The Construction Environmental Management Plan shall be implemented in accordance with the agreed details, unless otherwise agreed in writing by the Local Planning Authority.

Reason: *To ensure the environmental impact of the construction of the development is adequately mitigated and in the interests of the amenity of nearby residents/occupiers and to comply with Guidance for Local Planning Authorities on Implementing Planning Requirements of the European Union Waste Framework Directive (2008/98/EC), Department for Communities and Local Government, December 2012.*

Children, Families & Adults Comments

Housing

Planning statement 6.6.5 – lifetime homes, clarification that 25% of all homes in phase 2 will be of lifetime home specification (all affordable housing ~20% and 5% of market homes). This is a low figure and we would like to see it increased. Considering the Homes and Communities Agency aspiration is that by 2013 all new homes will be being built to Lifetime Homes standards it is felt a high proportion is warranted. The County Council considers it important that Northstowe includes sufficient affordable housing, so that key workers, including teaching assistants and care workers, can afford to live and work in the area. The 20% figure in the application is well below the 40% in the emerging South Cambridgeshire policy and should be tested further as part of the ongoing viability and S106 discussions with robust justification provided if a higher % cannot be achieved.

Housing Strategy page 2 – welcome the opportunity to review the housing strategy after a period of 2 years, as this will enable emerging extra care, and supported living strategies from CCC to be incorporated. However, clarification will be required on when the 2 year period begins and how much influence a updated/amended housing strategy will hold on the detailed plans. This has particular reference to the last line of the 3rd para under ‘objective: Public Sector Working Together’ (page 3) where early determination of requirements is requested.

Housing Strategy page 7 - Extra Care provision welcome the statement regarding provision for older people. Consideration should be giving to the timing of this requirement (likely to be much later in the life of the development) and therefore how land can be secured for this purpose.

Housing strategy page 11 'Objective : Support the early establishment of a new community' - this is a critical area for CFA and the approach suggested is welcomed. However insufficient ownership has been placed on the applicant and subsequent developers to contribute to this process. An example could be a commitment that non developed land could be handed to the community on a temporary basis for community uses (maintenance issues would have to be discussed)

Employment

Planning statement 6.7 – Consideration has not been given to the employment opportunities during the build out of Northstowe phase 2. It is requested that the application reflects that employment opportunities will be made available to local Cambridgeshire residents, in particular through making available apprentices and other training opportunities for young people in the surrounding area

Town Centre

Town Centre Strategy - Overall there seems to be a lack of focus on the town centre providing quality community services and facilities (which is a policy on page 33) and detailed in principle 7 page 10 (where the benefits of co-location is touched upon). There is a lot more focus on health services; it would be good if this could be extended for all public and community service.

Town Centre Strategy - Although it is mentioned there is little detail regarding the use of temporary provision and how this would align with the planned phasing of the town centre. More clarification is required.

Town Centre Strategy - Principles pg 6-13. It is disappointing that there are no principles relating to inclusivity, accessibility and the town centre being a focus for the community and a place for community development.

Town Centre Strategy – page 17. Difficult to comment on this table without space allocation (mentioned in comments under land use). It would be beneficial to specify the type of civic use expected in the town centre and the provision of civic hub (shared building providing library, access to local authority services & support including Children's centre outreach services etc). There is also concern that this table does not reflect the desire to have buildings with flexible shared use which may require a combination of D1 and D2 use classification.

Town Centre Strategy -6.2 anchors Pg 18. Welcome the opportunity that the secondary school will offer temporary community facilities but this would need to be explored in much greater detail, does this mean informal meeting space and drop in facilities? Would expect that a form (even if it is temporary) of a community Hub should be included as an early anchor. It is restrictive to only include health facilities. Also a community hub could provide additional education facilities (as they mention) and may include health facilities (such as in the Southern Fringe).

Town Centre Strategy – 8.1 need clarification on how community, health and childcare facilities (both temporary and permanent) are aligned with the town centre phasing.

Town Centre Strategy – page 30 welcome the power of 10 concept for the town centre.

Town centre Strategy – general comment would look for the link between the learning campus and the community facilities to be protected. For example for Consent Streets so that the type and nature of shops is managed e.g. to avoid betting/ fast food establishments.

Sustainability

Sustainability statement – general comment – sustainability statement fails to place sufficient focus on sustainable communities. National strategy for delivery of sustainable development discusses the importance of sustainable communities through improving people's lives through improving service delivery to new developments.

It is disappointing that the Community Development strategy was not attached in more detail to this document rather than as a mention in the housing strategy (appendix to the Planning Statement).

Sustainability Statement – Section 5.2 does not reflect the importance of room sizes in the well-being of the community's residents. Public health are currently identifying evidence to show the impact of small room sizes on wellbeing. Also we would like to see more cross referencing to flexible community space, and meeting the needs of existing and future generations. For example, adaptable housing; not just lifetime homes but also for extended families to live together, use of land mark sign posting around the town in order to ease navigating around the town for older people and the need for informal meeting spaces where people can get to know their neighbours and feel safe.

Sustainability Statement – section 11. To create a sustainable community there must be a combination of social inclusion, appropriate homes, appropriate jobs, services and community infrastructure. In order to facilitate community engagement and inclusion it is crucial that services and facilities are delivered at the right time and in the right location. Edgar definition defines sustainable communities as: active, inclusive, safe, well run, environmentally sensitive, well connected & well served. Targets & dialogue should be included in the document to reflect these elements.

Sustainability Statement - Health and wellbeing – comments in Health Impact Assessment (HIA) comments.

Sustainability Statement - Social infrastructure, disappointing that comments around the benefit provided by co-locating services and greater emphasis has not been captured. This is in terms of providing early support and promotes easy access to a range of services.

Sustainability Statement – Inclusivity, welcome the comment on the presence of community facilities enabling people to interact and establish relationships. However, the formation of these social networks requires support beyond just providing the infrastructure. Much of the research into new towns and community emphasise the importance of community development work beyond simple welcome events to help form these links. It is also well documented that despite good community development work, some residents will still struggle with loneliness and isolation following moving to Northstowe. Left unsupported these feelings can rapidly escalate to poor mental health; therefore it is seen as important that preventative specialist support is available in Northstowe in conjunction with the community development work.

Health

Health Impact Assessment - 5.2. Consideration should be given to the Local authority services that contribute to the health and wellbeing of residents particularly the role of the Locality Team and specialist mental health community workers. This should be understood in terms of capacity to deliver services to Northstowe. The benefits to financially supporting the local authority to provide sufficient preventative and early support should be explored. NB: this goes beyond providing the infrastructure to meet the discussed need by providing the actual support required to avoid the need escalating.

Health Impact Assessment - 5.9. Whilst the role and benefit of a Community development worker is appreciated there is a need for an additional resource to mitigate for the impact expected in Northstowe.

Health Impact Assessment - 5.9. Concerned that this section does not provide sufficient assurances that the need to support the community to form social networks has been reflected and addressed. 5.9.4 Emphasises the need for community integration with neighbouring villages but not community development within Northstowe itself.

In addition we would require more clarification on bullet one of the recommendation/monitoring. Using the number of complaints as a measure of disruption of community facilities is not acceptable.

Health impact assessment – B1.4.10 clarification required. When assessing the existing health profile has the finding of the Joint Strategic Needs Assessment (JSNA) for new communities been taken into consideration? This is particularly relevant in terms of the Mental wellbeing when looking at the existing population. The residents of Northstowe are more likely to follow the trends documented in the JSNA than the surrounding area.

Health impact assessment – C2. Welcome the recognition on page C3 that capacity of existing services affect the accessibility of services. This should be considered in terms of social (local authority) support services too.

Mothers of young children are also a vulnerable group in terms of mental wellbeing (JSNA).

Health impact assessment – HUDU Matrix. We do not feel the text in evidence, impact & recommendations columns relate to the more detailed discussion and evidence base documented in appendix B & C. More cross referencing is required recognising there is a health impact and developing a plan for how the developer will work with the relevant agencies to mitigate it.

Land Use

Planning Statement 4.1.3 - Greater clarification is required on the 'Health, Community & fitness' category. Concern that 6,000sqm will be insufficient for health and community facilities appropriate to the size of Northstowe. The Town Centre facilities should be sufficient to cover the whole of Northstowe (including phase 3) although we appreciate that these may be delivered when Phase 3 comes forward. Will require a better understanding of how this allocation will be split between each category.

Planning Statement 4.1.3 - greater clarification is required on the 'Youth Facility'

category. Does this category reflect indoor and/or outdoor facilities? Does this category include LEAP/NEAP provision if so 2,000 sqm will not be sufficient. If not how much has been allocated to local play areas?

Planning Statement 6.10 – clarification requested between children play space and informal outdoor space and the space provided by the Town square

PUBLIC HEALTH COMMENTS

Introduction to response from Public Health

The Health Impact Assessment (HIA) as submitted as part of the above application has been reviewed along with the other documents which are specifically mentioned in the HIA. The inclusion of an HIA for this application is welcome. Generally the HIA is a comprehensive account of the potential health impacts which could affect existing nearby residents or the future residents of Northstowe Phase 2. Appropriate health facilities (including opportunity for an NHS dental practice) need to be provided as part of Phase 2.

The outcome is that the Health Impact Assessment as submitted has been assessed as grade B. Grade B meets the required standard of the HIA SPD policy (only HIA's graded A or B are acceptable). Generally the HIA is a comprehensive account.

General comments on the HIA

General comments on the HIA:

- There is no mention of any provision for Gypsies or Travellers.
- There is not much detail about housing design e.g.
 - provision of Cycle Storage areas within each property,
 - provision of specific housing for older people
- There is no HIA of the connectivity of Northstowe to the other surrounding villages
- The Cambridgeshire “Building Communities that are healthy and well” document has not been used – This is a requirement of the South Cambridgeshire District Council HIA SPD
- The Local Policy included in Appendix A included Public Art – this has not been addressed within the main HIA
- There are concerns that the mix of employment is not balanced in that it may not be sustainable to concentrate on higher paid research and development type jobs at the expense of lower skilled/paid jobs.

Specific Comments on Section 5 of the HIA

Housing Quality and Design:

- **Existing Conditions**
The appropriate reports have been used. There should have more details on the affordable housing proposals broken down by tenure.
- **Impact Assessment – Construction Phase**
The impacts considered include air quality, noise and visual intrusion linking to

mental health. The assessment has also considered affordability on the local rental market due to renting by contractors for their workers.

- **Impact Assessment – Early Occupation**
Same as construction phase. The benefits include access to a range of housing types and tenures.
- **Impact Assessment – Full build out**
There is an aim to achieve a minimum of code for sustainable homes level 4 for some market homes but this figure is not defined and needs to be confirmed as part of subsequent negotiations.
- **Health Effects**
There are potential negative effects on Mental Health due to construction – particularly to occupants of Rampton Drift including vulnerable groups of older people and children living nearby. The HIA states that these are to be controlled through the CEMP although the precise effects which can be controlled and by how is not clear. Minimum space standards are mentioned in relation to density but it is not clear that the minimum space standards will be met for all dwellings.
- **Recommendations and Monitoring**
The proposed recommendations and monitoring suggestions are fine and these should be conditioned as part of any consent.

Access to healthcare services and other social infrastructure:

- **Existing Conditions**
The assessment of the existing services is fine.
- **Impact Assessment – Construction and Early Occupation Phases**
The assessment that there are likely to be increased demand on existing healthcare services during both the construction and early occupation periods is fine, and mitigation is therefore required.
- **Impact Assessment – Full build out**
The assessment for the full build out period is fine
- **Health Effects**
There are concerns that there is likely to be a significant gap in terms of healthcare facilities provided in the town centre due to the projected phase build out of the town centre. The facilities in Longstanton, which are being expanded to cope with phase one and the existing communities of Longstanton, will reach capacity before the healthcare facility in the town centre is built. Therefore the town centre facility will need to be brought forward in the phasing schedule or an alternative temporary capacity will need to be provided.
- **Recommendations and Monitoring**
The proposed recommendations and monitoring suggestions are fine and these should be conditioned as part of any consent. There is a recommendation on provision of transport, but this has not been mentioned in the assessment so it's unclear as to why it needs any mitigation measures. The recommendation on the use of school facilities will need community access agreements and it is suggested this forms part of the planning consent otherwise there could be limited community facilities if the school options are not available.

Access to Open Space and Nature:

- **Existing Conditions**
The assessment of the existing conditions is fine although the loss of the existing golf course as part of phases one and two should have been included.
- **Impact Assessment – Construction Phase**
The assessment of the impacts during construction are fine. There may be impacts on the open space in phase one during the construction of phase two, in addition the phasing and build out will need to ensure that the open space remains

accessible.

- **Impact Assessment – Early Occupation**

No comments

- **Impact Assessment – Full build out**

No comments

- **Health Effects**

There is no assessment of the distance to open space from phase two residential dwellings which should form part of the access to open space assessment. There is little detail on the provision and location of open space. This will need to be included as part of any reserved matters applications.

- **Recommendations and Monitoring**

The proposed recommendations and monitoring suggestions are fine and these should be conditioned as part of any consent. For the second recommendation “*Reinstatement of areas of existing open spaces or footways required for construction should be to the same standard as prior to construction*” this should be amended to read “...*same standard or better as prior...*”

Air Quality, Noise and Neighbourhood Amenity:

- **Existing Conditions**

This section is factually incorrect, an Air Quality Management Area (AQMA) has NOT been declared for the site, however, an AQMA has been declared for certain lengths of the A14 north of Cambridge and may include the A14 close to the proposed southern access road.

- **Impact Assessment – Construction Phase**

The assessment that dust is not normally associated with negative health effects is disputed, dust may exacerbate existing preconditions such as asthma and respiratory conditions. Reference is made to the CEMP with regards to contaminated waste, these references need to be expanded to include UXO as well as contaminated land. The Travel Plan will need to include both construction and construction worker traffic due to the length of the build out to reduce emissions and noise.

- **Impact Assessment – Early Occupation**

The assessment is fine

- **Impact Assessment – Full build out**

The assessment is fine but advice should be sought from the Environmental Health Officer at South Cambridgeshire District Council with regards to the significance of concentrations of airborne pollutants from traffic.

- **Health Effects**

The assessment of the health effects is fine but it is worth noting that the duration could be for a number of years and may be considered long term rather than short term.

- **Recommendations and Monitoring**

The proposed recommendations and monitoring suggestions are fine and these should be conditioned as part of any consent. Conditions should also be attached which control the location and design of any haul roads in order to protect existing residential properties and the occupants of the early phases of phase 1 and 2. There is also likely to be noise from the commercial uses in the town centre which may need to be conditioned at reserved matters stage.

Accessibility and active travel:

- **Existing Conditions**

The assessment of the existing conditions is fine but the assessment would benefit from assessing the usage patterns of the Cambridgeshire Guided Bus cycle path as this is not illuminated and during the early evenings. In winter this

may cause a usage drop leading to a more seasonal pattern of use, and an increase on road traffic during the winter months and therefore additional pressure on the local road network.

- **Impact Assessment – Construction Phase**
The assessment is fine but should mention the need to separate haul roads from traffic and pedestrians where feasible as part of a road safety strategy.
- **Impact Assessment – Early Occupation**
No comments
- **Impact Assessment – Full build out**
Safer routes to schools should be one of the guiding principles and seems absent from the HIA. The principles of this section are fine but the “how” is missing and there are no specific references to other plans which may help achieve the aims.
- **Health Effects**
The assessment of health effects is fine but there needs to be careful phasing and mitigation to ensure that as much open space remains accessible during the 15+ year build out.
- **Recommendations and Monitoring**
The proposed recommendations and monitoring suggestions are fine and these should be conditioned as part of any consent.

Crime Reduction and community safety:

- **Existing Conditions**
The assessment of the existing conditions is fine
- **Impact Assessment – Construction Phase**
The assessment of the construction site being a possible target for crime is correct and as such a security strategy should be agreed with the Police and South Cambridgeshire District Council prior to the commencement of construction on site.
- **Impact Assessment – Early Occupation**
As above in addition the presence of occupied dwellings intermixed with construction activity may give rise to feelings of insecurity of the early occupiers of phase two, therefore a community development approach is recommended to alleviate any insecurity prior to occupation and to continue until, if not after, final full build out is complete.
- **Impact Assessment – Full build out**
The assessment is fine but the final paragraph mentions potential negative impacts due to the night time economy and there appears to be no mitigation measures proposed to control this.
- **Health Effects**
The assessment of the health effects is fine.
- **Recommendations and Monitoring**
The proposed recommendations and monitoring suggestions are fine and these should be conditioned as part of any consent but clarification is needed as to what is meant by “early occupation” in the second bullet about providing support services for young people. An appropriate trigger level to provide services for young people needs to be set as part of any consent.

Access to healthy Food:

- **Existing Conditions**
No comments
- **Impact Assessment – Construction Phase, Early Occupation, Full build out**
The assessment of the impacts during the various phases of the development is fine.
- **Health Effects**

The assessment of the health effects is fine.

- **Recommendations and Monitoring**

The proposed recommendations and monitoring suggestions are fine and these should be conditioned as part of any consent. There needs to be a strategy to prevent the possible proliferation and location of fast food outlets in the town centre and the wider phase two development to control:

- Outlets near schools or on routes to schools
- Outlets near or in open green space
- The numbers of outlets

This could involve declaring Northstowe a consent street area prior to commencement of construction, and early discussions with Public Health and the South Cambridgeshire District Council would be beneficial.

Access to work and training:

- **Existing Conditions**

No comments

- **Impact Assessment – Construction Phase, Early Occupation, Full build out**

The assessment of the impacts during the various phases of the development are fine, although an assessment of the potential of Northstowe becoming a “learning” centre could have been assessed, including the location of the library and education in terms of bringing positive health benefits to residents and those from further afield.

- **Health Effects**

The assessment of the health effects is fine.

- **Recommendations and Monitoring**

The proposed recommendations and monitoring suggestions are fine and these should be conditioned as part of any consent. In addition a strategy to promote local job opportunities both during and post construction would be beneficial, these may include linking with local construction colleges. There is an opportunity to see education as an opportunity throughout the life course as a continuum of learning rather than focusing on specific age groups if Northstowe is to become an “exemplar of education”.

Social Cohesion:

- **Existing Conditions**

The assessment is fine but there is likely to be issues with integrating the existing communities of Oakington, Longstanton and Rampton Drift.

- **Impact Assessment – Construction Phase**

No comments

- **Impact Assessment – Early Occupation**

The assessment is fine but there will be the need for additional community development work/workers to build on the work on the phase 1 development and to work on phase 2 before the first occupation of phase 2.

- **Impact Assessment – Full build out**

The assessment is fine.

- **Health Effects**

The assessment of the health effects is fine.

- **Recommendations and Monitoring**

The proposed recommendations and monitoring suggestions are fine and these should be conditioned as part of any consent, and would suggest a facility is made available prior to commencement of works on phase two for community development to have a base, this may be a temporary facility and could be based in phase one during the early period prior to construction of phase 2.

Minimising the use of resources:

- **Existing Conditions**
There is some confusion regarding the terminology of Waste recycling centres which should be clarified, there is a difference between Household Waste Recycling Centres and “Bring Sites”.
- **Impact Assessment – Construction Phase, Early Occupation, Full build out,**
No comments
- **Health Effects**
The assessment of the health effects is fine.
- **Recommendations and Monitoring**
The proposed recommendations and monitoring suggestions are fine and these should be conditioned as part of any consent. The issue of litter can also be controlled by good design as well as by monitoring.

Climate Change:

- **Existing Conditions**
No comments
- **Impact Assessment – Construction Phase, Early Occupation, Full build out**
No comments
- **Health Effects**
The main findings of the assessment are fine, however an assessment of building design (cooling and heating technology) would have been beneficial, Surface water flooding both during construction and full build out could also have been included.
- **Recommendations and Monitoring**
The proposed recommendations and monitoring suggestions are fine and these should be conditioned as part of any consent, in addition there could be innovative solutions to flooding and runoff through permeable hard standing areas and pavements.

Summary of comments on the HIA

In summary the main concern relates to the likely significant gap in terms of healthcare facilities provided in the town centre due to the projected phase build out of the town centre. The facilities in Longstanton which are being expanded to cope with phase one and the existing communities of Longstanton will reach capacity before the healthcare facility in the town centre is built. Therefore the town centre facility will need to be brought forward in the phasing schedule or an alternative temporary capacity will need to be provided.

In addition the following conditions should be imposed on any consent:

- Community access agreement(s) for the school(s) to provide access to both community building space and open green space
- A condition to control the location and design of any haul roads in order to protect existing residential properties and the occupants of the early phases of phase 1 and 2.
- Trigger levels are set which clearly define what is meant “early occupation” particularly in regards to the provision of support services for young people.
- A strategy is needed to prevent the possible location and proliferation of fast food outlets in the town centre and the wider phase two development to control, a strategy or planning restrictions should consider:
 - Outlets near schools or on routes to schools
 - Outlets near or in open green space
 - The numbers of outlets

This could involve declaring Northstowe a consent street area prior to commencement of construction, and early discussions with Public Health and the South Cambridgeshire District Council would be beneficial.

- a strategy to promote local job opportunities both during and post construction, these may include linking with local construction colleges and include consideration of apprenticeships.
- A facility/building is made available prior to commencement of works on phase two for community development to have a base.
- A condition to require a “Safer Routes to Schools” concept is included in any school travel plan.
- A security strategy is agreed with the Police and South Cambridgeshire District Council prior to the commencement of construction on site, and a community development approach is taken to alleviate any insecurity prior to occupation and to continue until, if not after, final full build out is complete.
- The mitigation measures proposed in the CEMP should be conditioned.

In addition the applicant should consider the following issues as part of any reserved matters applications.

- There is also likely to be noise from the commercial uses in the town centre
- More precise detail on the location of smaller areas of open space.

Comments on other documents submitted as part of the Application

Construction Environmental Management Plan (CEMP):

- Section 6.2.4 mentions the need to avoid bonfires – this should be conditioned that no bonfires are allowed on site during the construction period.

Planning Statement:

- There is no provision for Gypsies or Travellers mentioned in the Planning Statement
- In section 4.1.3 table 4.3 gives an allocation for town centre floorspace for “health, Community, Fitness Centre” this needs to be split down by each use to give a precise allocation for the “Health” use.
- Section 6.13.2 mentions a short section of the busway route will temporarily be shared with traffic – there needs to be a health impact assessment of this proposal.

Town Centre Strategy:

- There is no mention of public toilet facilities in the town centre
- There needs to be a “community space” early on in the phasing of the town centre
- The Health facility will need its own parking provision for those with mobility issues who may not be able to walk from a central car park. In addition it will need access and parking for ambulance vehicles.

LIBRARIES, ARCHIVES AND INFORMATION COMMENTS

There is no specific date or phase given for the construction of the library (or shared community building which the library is part of) The town centre construction is from 2019 – 2031 and in the Town Centre Strategy (pg 18) it states that the library could be an early anchor for the Town Square but this is a suggestion and not definite.

Nowhere does it suggest the library will be in a shared building or a standalone

building . We would want to co-locate library, learning and information services as part of multi-service / multi-agency provision / one stop shop provision if at all possible.

SPORTS COMMENTS (combined with SCDC Sports and Leisure comments)

Comments on whole Northstowe site

The Sports Principles paper developed along with South Cambs DC should be used to underpin all of the sports facility provision at Northstowe.

We should "*Continue to develop and invest in a network of high quality, fit for purpose sports facilities that facilitate increased participation, improve health and well being and enhance the quality of life for existing and new communities*".¹

The development of sports clubs, whether social or competitive, assists with community cohesion and the general health of the population. The provision of formal and informal open space allows people to relax and enjoy their leisure time.

Modern sports facilities should be:

- Integrated into the overall design of a new development through the planning and consultation process
- Positioned in accessible locations with the potential for users to arrive by foot, bike, car or bus.
- Fully accessible to everyone with well-designed sports and ancillary facilities e.g. car parking, reception area and changing rooms
- Where appropriate, clustered with other sport facilities to provide a multi sports hub
- Designed and built following consultation with users, and national and local sports organisations and to technical standards and guidelines drawn up by *Sport England* and/or the Sports Governing Bodies.

New provision could be provided through:

- Upgrading and enhancing existing facilities
- Co-locating with other community facilities e.g. a school, if evidence shows that this is the best place to position them and if a mutually acceptable dual use agreement is in place for a minimum of 21 years.

Space

Standards should be established regarding accessibility, quantity and quality of sports facilities, taking into account local demographic forecasts and the existing and projected rates of participation. These are locally determined by:

- Local Authority demand analysis and planning documents²
- A Playing Pitch Strategy (for outdoor sports)
- A Sports Facilities Strategy (for indoor sports).

Modelling of local supply and demand is supported by a range of documents, including Local Authority Sports and Leisure Strategies, local sports clubs

¹ Cambridgeshire Sports Facilities Strategy 2008-2021. Strategic Leisure.

² Examples : Fenland Sports Facilities Demand Analysis 2026 and South Cambs : Sport Play and Open Space Supplementary Planning Document, Jan 2009

assessment of demand and *Sport England* publications³

Service Standard

High quality services which are:

- Within a 20 minute walk of quality provision in urban areas⁴
- Within a 20 minute drive of quality provision in rural areas
- Delivered through an extensive range of public and commercial sports facilities
- Monitored regularly to assess performance against recognised standards⁵

Core services

- Access to local facilities and a supportive infrastructure to aid participation in sport by all members of the community
- A wide range of sports facilities that encourage participation, competition and excellence
- Opening hours and a pricing structure that reflects the needs and capabilities of the local population to participate in sport
- Well-designed facilities to guarantee equality of access for all and a quality experience for everyone participating in sport

Enabling provision

- Locally based sport development worker(s), building links within and between new and existing communities.

Comments on Phase 2 application

- Policy NS/19 of the Northstowe AAP states:
"The requirements of the strategy for formal sports provision which are directly related to the needs of the future residents of Northstowe and its implementation will be met in full by the development in terms of the quality, quantity and location of facilities provided"
- The proposal within the paper still does not provide enough open space for outdoor sport as required within the N'stowe AAP. The accepted requirement is for 14.39 hectares not 10.66 as outlined

The original 'Sports Facilities Strategy for Northstowe' was produced in 2008. It is a concern that this strategy has not been reviewed and fine tuned. It is very important to review the strategic vision for sport in Northstowe so that the development of indoor and outdoor sports facilities in the town meet the required standards.

³ Sport England key documents:

- *Sport England's* Active Places database and Active Places Power strategic planning tools.
- *Sport England's* Facilities Planning Model.
- *Sport England's* Active People and Market Segmentation tools.
- *Sport England's* Sports Facilities Calculator
- Sport England's Playing Pitch Strategy guidance

⁴ Sport England key documents:

- *Sport England's* Active Places database and Active Places Power strategic planning tools.
- *Sport England's* Facilities Planning Model.
- *Sport England's* Active People and Market Segmentation tools.
- *Sport England's* Sports Facilities Calculator
- Sport England's Playing Pitch Strategy guidance

⁵ 'Quest Accreditation' Quality Assurance Scheme.

Para.6.10 states that a strategy for formal sports and play provision will be prepared following the granting of outline consent. This should be produced earlier than this to assist design and specification and also to inform Members and the general public when they are considering applications for Phase 2 and 3.

The overall requirement for outdoor sport in 2008 was calculated at 38.2ha, adjusted to 34.6ha to take account of the proposed provision of two full-size Artificial Grass Pitches (AGP's). However, there is no reference to overall outdoor sport provision for Northstowe in the current application. Again, a revised strategy is essential to confirm the new requirements for outdoor sport.

With regard to Phase 2, it is stated that provision for outdoor sport will equate to 10.66 hectares, however the policy requirement for phase 2 is calculated at 14.4 hectares, a shortfall of 3.74 hectares.

This phase includes the Eastern Sports Hub and the remainder of the Northern Sports Hub (most of which was included within Phase 1 of the development).

There is a lack of detail with regards to the full range of sports facilities to be provided within each sports hub e.g. grass pitches, artificial grass pitches, tennis courts, athletics tracks, multi-use games areas etc. It is difficult to make an informed comment if the facility mix and proposed location and layout has not been include.

The 2008 strategy for delivering indoor community sports facilities for Northstowe is via shared use facilities on the proposed secondary school site with detailed management arrangements to be agreed at a later date.

The original 2008 strategy highlighted the need for the following facilities to meet demand from the new population, with these provided in phase 2:

- 8 court sports hall
- 6 lane 25m swimming pool plus learner pool
- Health and fitness suite
- 2 Squash courts

It was proposed that the main indoor community sports facilities for the whole of Northstowe would be provided as a 'dual use' facility at the proposed secondary school.

The current application does not contain detailed plans for the proposed secondary school, in particular the community sports facilities. Again it would assist the process to review and revise the sports strategy with regard to indoor sports provision.

Other issues/questions:

- How useable will the school sports pitches be if they are on the flood plain? Has the 'Institute of Groundsmen' been consulted on the suitability of the surface/sub surface?
- ATPs that have water on them and then freeze will be very expensive to maintain and repair.
- To meet South Cambs and Sport England standards formal water space (swimming) is required in Northstowe. The sport stakeholder group had outlined the secondary school as the optimum provider but I do not see a pool and adjoining learner pool identified in this application?
- There seems to be a super-sized AGP suggested in the text to provide for

different sports to be played. This is not a practical or logical solution and cannot be supported. Ideally phase 2 should provide one full sized, floodlit, sand filled AGP at the school site and one floodlit, 3G rubber crumb surface full size pitch within the adjoining sports hub.

- Given that the density of housing is greater than phase 1 there need to be opportunities for people to access sport and leisure.
- This proposed reduction in provision will reduce the potential usage for the local population and increase the carbon footprint as people have to travel away from Northstowe to play sport. A lose- lose scenario from the off in an 'exemplar' development.
- Social inclusion, community engagement /cohesion , volunteering opportunities (25% of all volunteers are in sport) and the health and fitness of the community are also compromised just when the nation has a health crisis and the Governments main focus is to prevent obesity and diabetes.
- You cannot count school pitches as community pitches.
- Whilst many of the school sports facilities are provided for community use (acknowledged as very good practice) they cannot and never were regarded as community sports facilities or counted against SCDC sports standards .
- Community standards for pitches and buildings are higher than school standards. We need to ensure the pitches are properly drained especially given their location on the floodplain.
- Will there be a learner pool at the SEN unit?
- The school talk about dual use but what is the fall back position if over time the school decides it cant afford the upkeep of those facilities. What access can be secured for the community to sports provision in perpetuity?
- This is for a range of reasons for concern if the school manages all the sports provision including the following:
 - They will not be operated, maintained or owned by SCDC, or a community organisation ,so there is no guarantee of a long term sports provision for the community at the school site.
 - The school cannot use its budget to support the upkeep and maintenance of 'community ' sports facilities. If they are making a loss, the school cannot assist with a ' survival' payment.
 - The school will always have priority use. For example the school may want a pitch for a school match and consequently will not want the community to be using the pitch at that time.
 - The wear and tear on school pitches in particular by over use by the community can cause frustration/cancellation.
 - The four court multi use netball/tennis area within the school is a curricular space provided for the school. It cannot be part of the pitch replacement calculation for N'stowe.
 - The full size sand dressed pitch at the school is essentially provided for hockey. Hockey is not played on grass pitches so a sand dressed pitch does not replace 3 grass pitches. It is one pitch and should be counted as one pitch.
- There doesn't appear to be any detail on what type of public changing facility there is
- What indoor sport is being provided?
- There seems to be a mega ATP being suggested at the school combining different surfaces (hockey/football). This is not practically possible.
- There are lots of LAPs being suggested but it would be better to discuss combining some of these to become Leaps/Neaps with the required buffer zones in order to give children better access to activity.
- There appears to be no green areas in the town centre

- Open space has to be useable. The land designated as of significant archaeological interest therefore should not count towards that provision.

ARTS COMMENTS

*'Spaces for the creation, production, performance and showcasing of arts are an essential component of sustainable and successful communities; the arts are able to bring people together, create links between different communities, and encourage people to feel a sense of pride and belonging in their local area.'*⁶

*'Arts leaders and organisations occupy a major place in the 'Big Society': as civic leaders they contribute to the cohesion of their local communities, civic pride and quality of life.'*⁷

Arts activities create opportunities for community interaction and build a sense of place. They can inspire learning and support skills and personal development as well as health and mental well-being and are an essential component of positive activities for young people. High quality, sustainable and well-located arts facilities need to be taken fully into account in the planning of new development and in regeneration, they sit within the category of social and community needs. The arts play a vital part in social and economic regeneration.

Modern arts provision should be:

- Flexible to meet the needs of diverse audiences
- Flexible to meet the demands of different and new art forms
- Integrated into the overall design of a new development
- Fully accessible to everyone with well-designed facilities
- Positioned in accessible locations

New provision will facilitate an ongoing and meaningful experience of the arts and may best be provided through:

- A specifically designed and built arts facility
- An enhancement of existing facilities and venues
- Co-location with other cultural and community facilities

Space / Premises:

- 45 square metres per 1,000 population⁸

(NOTE: The benchmark outlined above should be seen as a starting point for negotiation. It should be translated into local benchmarks by local authorities, supported by local evidence of need, and the derivation of local costs. This will include an assessment of:

- The location, size, and services offered by arts venues.
- Quantitative and qualitative assessments of their current adequacy
- An assessment of needs and opportunities taking account of the estimated population increases or changes in the distribution of population in growth areas⁹)

⁶ Arts, Museums and New Development, A standard Charge Approach, March 2008.

⁷ Arts Council England – Why the Arts Matter 2010

⁸ Arts, Museums and New Development, A standard Charge Approach, March 2008.

⁹ TCPA Culture and Sport Planning Toolkit, May 2013.

Service Standards

- Opportunities to participate in a wide range of arts activity
- Opportunities to access high quality arts practice
- Equitable and inclusive access across the County

Core Services:

- Access to and local opportunities to participate
- Galleries housing permanent collections and temporary exhibitions;
- Multi-use arts venues and theatres;
- Production, rehearsal and education space for arts.
- Opportunities for participation available from birth to old age
- Access to a range of high quality arts provision

Enabling provision

- Locally based arts development worker (s), building links within and between new and existing communities.

We see no mention of the above in the phase 2 planning application. We would like to see an arts strategy developed for the whole site to include phase two. The town centre is a major provision in phase 2. As such consideration for arts provision, which could include a performance space, display areas, public art or a myriad of other options should be explored and provided to meet a local need. This is the advice given in the Town and Country Planning Toolkit, 2013. There is no mention of resources, particularly in the early years of the phase two development, of an arts development post. This would assist with establishing arts groups, performances, displays etc. in Northstowe. The County Council considers that overarching strategies on culture and public art should be produced in order to provide guidance on these important elements. These could be conditioned to ensure that they are produced prior to submission of the Reserved Matters applications.

MUSEUMS COMMENTS

“Museums enrich the lives of individuals, contribute to strong and resilient communities, and help create a fair and just society. Museums in turn are immensely enriched by the skills and creativity of their public”¹⁰

Application of the Association of Independent Museum’s 2010 *Economic Assessment Toolkit* suggests that the value of visitors to museums in Cambridgeshire in 2012-2013 approached £4m¹¹.

Modern and attractive museum facilities should be:

- In accessible locations with good transport links
- Located in a significant local building or co-located with community facilities thus enhancing the community landscape
- Accessible to the whole community and users across the age ranges and people with a disability
- An inspiring, safe, local space for both local community and visiting audiences
- Interpreting the collections in ways which support users’ learning and enjoyment¹²

¹⁰ <http://www.museumsassociation.org/museums-change-lives. Museums Association 2013>

¹¹ *East of England Museums Benchmarking* <http://sharemuseumseast.org.uk/wp-content/uploads/2014/03/Benchmarking-2012-13-All-museums-FOR-PUBLICATION-ONLINE.xls>

New provision may best be provided through:

- Upgrading of existing facilities through redisplay, refurbishment and extension to provide better access and interpretation.
- Co- location with other cultural or community facilities
- Utilisation of a redundant historic building, for which it provides a viable use.

Space / Premises:

- 28 square metres per 1000 population¹³.
- Public space should include, reception area, public exhibition area (permanent) and preferably also temporary exhibition space. Non public space should include collection and archive/library storage areas.

Service standard:

Accredited museums must obtain or exceed published minimum standards in collection care and documentation, both in how they are managed and governed and on the information and services they offer to their users.¹⁴

Core Services:

- Access to collections, either on-line or in person
- Visit available from birth to old age.
- Access to a range of excellent quality interpretation material within the collections
- Flexible opening hours

Enabling provision:

- Locally based museum development worker(s), building links within and between new and existing communities.

¹² *Arts, museums and new development: a standard charge approach. MLA 2008.*

¹³ <http://www.museumsassociation.org/museums-change-lives>. *Museums Association 2013*

¹⁴ *Arts Council England (ACE) Accreditation Scheme*

EDUCATION COMMENTS

General – relate to Illustrative Masterplan; Design and Access Statement; Parameter Plans and Planning Statement:

Following detailed pre-application discussion with the developer, a number of assumptions have been made about Northstowe Phase 2. Understanding these is critical for providing a context for the comments made in relation to the 0-19 year old educational provision required as being necessary to mitigate the impact of the development proposals.

Northstowe phase 2 is proposed as being for development of up to 3,500 homes. The Council has assumed a standard housing mix, but based on information provided by the developer, and in consultation with Council officers, has assumed only 20% of these homes will be classed as affordable housing. This is a significant assumption, as the percentage of social housing is one of the main factors in determining the overall pupil yield forecast from a development. The long term pupil forecast for the phase 2 proposals are outlined in table 1 below.

Table 1: Long-term forecast for 3,500 homes in Northstowe Phase 2, assuming 20% affordable homes

Age range	Total forecast child yield	Forecast pupils per year group	Forms of Entry ¹⁵ (FE)
0 to 3	746	187	n/a
4 to 10	1089	156	5.2
11 to 15	778	156	5.2
16 to 18	467	156	n/a

It is critical that these comments are read only as a comment on the proposals set out in the Phase 2 outline planning application. Any changes to the number of homes, housing mix and specifically tenure mix will lead to changes in the forecast pupil yield for the development. Revised assessment of the demands of the development will be required should this key assumption change.

The Council had a significant objection to the Land-use Parameter Plan, which indicated that part of the eastern education site may be used for residential development. . The overall site area of the eastern education site at 16.74 hectares was 2 hectares smaller than the County Council would typically require for the range of education provision which will be located on this site; this will include all phases of education (Early years, Primary, Secondary, Post-16 and Special Education Needs). Following formal amendments the land allocated for education use has been increased to meet the councils minimum requirements and the objection is now withdrawn.

Early Years and Childcare:

The County Council has a statutory duty to facilitate the market to secure sufficient early years and childcare provision. Although its role is as a commissioner of provision rather than as a provider. A key part of this role is to ensure that there are sufficient places to enable eligible 2 year olds (currently approximately 40% of 2 year

¹⁵ A single form of entry is 30 places x the numbers of years in the school. Thus, for primary school 1 FE is equal to 30 places x 7 Year Groups and for secondary school 1 Fe is equal to 30 places x 5 Year Groups

olds) and all 3 and 4 year olds, to access 15 hours free provision each week.

There is also a duty to secure a range of different types and patterns of provision to support families in returning to work. This will include the promotion and development of the childminder market as well as full day-care for 0-4 year olds.

The planning application includes the provision of two new primary schools, which will provide some mitigation towards the impact of the proposed development.

In line with the Council's established policy, these schools will include accommodation to facilitate pre-school provision. Each school would typically be expected to provide a class base for each form of entry, thus a 2 FE primary school will provide 2 class bases. Each class base can provide up to 52 sessional places for 3 and 4 year olds or 48 sessional places for funded 2 year olds. Across the two schools, it is anticipated that there five class bases, which equates to places for up to 260 3 and 4 year olds, or 240 funded 2 year olds.

Against a likely overall demand of around 480 places for funded 2's, 3 and 4 year olds it is clear that this is insufficient to allow the Council to fulfil its statutory duties. It is important to note that eligible children will also be expected to access their free entitlement through a range of different types of provision. This includes other Private, Voluntary and Independent pre-school settings, full day-care and childminders.

It is also important to highlight that this level of demand assumes that these children only take their 15 hour statutory entitlement. Evidence clearly demonstrates that provision of additional hours is needed to meet the needs of families. Therefore, additional early years settings will be needed throughout Phase 2 of Northstowe to ensure that the demand for provision can be met.

In addition to these sessional places, there will also be a need to secure appropriate provision to enable other pre-school and day-care providers to open. The County Council would not seek to have these sites secured through the outline planning application, but would request that sufficient plots of land are given a D1 planning allocation, to facilitate the delivery of private providers, to establish provision as the development progresses. This may include exploring opportunities which may arise in relation to other service provision, for example, co-location of a pre-school with Community Facilities. Provision should be in accessible locations, and should reflect different patterns of accessing provision. This includes families opting for a setting close to their employment and not just homes. To reflect this, opportunities to secure sites within the town centre, local centres and employment hubs should be encouraged. In addition, there should be consideration as to how private pre-school and early years provision can be encouraged and maximised through and within the S106. The County Council has recently incorporated this approach into the S106 at Alconbury Weald.

Primary education provision:

The phase 2 application provides for 2 primary schools (one 2 FE and one 3FE) to be delivered as part of the delivery of phase 2. Between them, these schools will provide 1,050 primary school places. When considered alongside the longer forecast demand of Northstowe phase 1, this is sufficient demand to mitigate the impact of the development proposals.

There will be a need to carefully consider the timing of delivery of these schools to ensure that there is sufficient capacity in Reception and Key Stage 1 year groups to

meet the demand of the new community.

The timing of these schools, PS1 in Sub Phase C (2019-21) and PS2 in Sub Phase E (2023-2026) will be critical to ensuring that the Council can commission sufficient primary education provision. It is considered that the proposed phasing is appropriate, to allow development of the schools alongside the corresponding residential development.

It will however, be critical, that:

- the S106 agreement provides sufficient assurance that free-serviced sites, as defined by the County Council's policy (Cabinet 2014), are provided in a timely manner;
- in the planning and delivery of subsequent phases of delivery sufficient consideration is given to securing safe walking and cycling routes to schools. It is noted that once travel patterns are established in the early stages of a school being open it can be more challenging to change these. It is therefore, critical, that throughout the delivery of each sub-phase, every effort is made to promote sustainable modes of travel.

It is stated that the eastern schools would be up to 12m in height while the western school would be up to 9m. It is requested that flexibility is maintained on these heights to meet the requirements for a primary school that may be up to two storeys and a higher secondary school. Maximum of heights would be of **15m** and **12m** respectively may more suitable. It is positive that no minimum heights for the schools have been set.

The schools are overlooked by residential development that is stated to be up to 3 storeys high in some locations. This is appropriate and should ensure that the school buildings are not unduly overlooked.

Primary School 1 site:

The first primary school is proposed as being delivered adjacent to the secondary school, to the west of the site. The final location of the primary school within the site is yet to be determined. The developable areas established through the parameter plans are considered to provide sufficient flexibility for the County Council and other stakeholders to finalise the site area outside the Outline Planning Application process.

The relationship between the primary school and the primary road will be crucial. Specifically, the Council is concerned that there is the potential that the location and design of the primary road, adjacent to the primary school, will not allow for a free ease of movement for parents and pupils to and from the school. To address this, the Council requires the layout of the primary road to be carefully managed with clear crossing points to allow for ease of access to both the primary and secondary schools, with priority given to pedestrians and cyclists.

Primary School 2 site:

The second primary school site is located to the east of the centre of the Phase 2 development, surrounded by residential land uses with a secondary access route from the western primary access road. The location of this primary school is supported, being located centrally to the site and community it will serve, and with good access to the school from the surrounding road network. It is also set back from the primary road network, which allows for ease of movement to the school.

The Council has previously raised concerns about the proposal for the school to be delivered through the re-use of the Officer's Mess building. Evidence was requested to demonstrate that this approach will not undermine the ability to deliver a high quality and sustainable environment for the delivery of education, and the Council objected to this proposal in the absence of such information, and the expectations for use of this site for education purposes raised through the planning application. Evidence has now been received that gives the County assurance that the site and partial use of built form can be used to provide modern high quality education whilst retaining the heritage and character of the site. Therefore the objection is now lifted in this regard subject to the applicant providing additional resource to fully fund the development of the school and the reuse of the building as far as it practicable. The reuse of this site for the second primary school is supported subject to appropriate funding and detailed site specific and technical surveys.

Paragraph 72 of the National Planning Policy Framework (NPPF) sets out that the government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. It also sets out that the authority should give great weight to the need to create, expand or alter schools. In this regard it is imperative that the education authority have the ability to build a purpose built school that meets the stringent Building Bulletin requirements. It is highly unlikely that the officer's mess building will be of an appropriate size, scale, height and layout to meet the educational requirements for the school, even with significant amendments. It will significantly constraint any school development on the site and is not supported by paragraph 72 of the NPPF.

The reuse of the officer mess building is supported following submission of feasibility studies. Further technical studies will need to be carried out and the applicant will need to mitigate financial risk to the county council. However as the school will be required later in the phase 2 implementation, the council would support an interim community or business use of the site and buildings.

Secondary education provision:

Secondary education for Northstowe phase 2 will be provided by the expansion of the secondary school from the 4 FE delivered in response to Phase 1 to 8FE.

The site set aside in the Northstowe Phase 2 indicative masterplan is closely aligned to the site identified in the Northstowe DFD and Phase 1 S106 agreement. The amendments which have been made have been in consultation with the County Council and are supported. It is considered that the modified approach and flexibility within the site provide the opportunity to better generate linkages between the secondary school, Post-16 provision and the town centre than would have been possible previously. This will further support the development and delivery of the Northstowe Economic Development Strategy and may help create better links to community facilities by enabling the school's design to better relate to the wider community.

The relationship between the secondary school and the primary road will be crucial. Specifically, the Council is concerned that there is the potential that the location and design of the primary road, adjacent to the primary school, will not allow for a free ease of movement for parents and pupils to and from the school. To address this, the Council requires the layout of the primary road to be carefully managed with clear crossing points to allow for ease of access to both the primary and secondary schools, with priority given to pedestrians and cyclists.

A further consideration is the relationship between the secondary school and indoor and outdoor community sports provision. This is especially true in relation to the potential for shared use and management of these facilities. It is noted that the overall site area for formal outdoor space is significantly below the SCDC policy requirements. The outline planning application suggests that this will be offset, in part, through the provision of All Weather Pitches. The County Council would suggest that if this approach is to be accepted, that these should, where possible and appropriate, be located on, or as close to the secondary school site as possible. This will promote greater security for these facilities, as well as allowing their use by as many people as possible, which could further enhance the sports curriculum delivered at the secondary school.

There is a need to clarify the approach for delivering community sports provision in Northstowe, specifically for defining the long-term governance arrangements to ensure that the facilities which are provided remain viable and of high quality. Discussions between the Councils and Cambridge Meridian Academy Trust have begun. It is important to understand SCDC's long-term aspirations for management and governance of public assets in Northstowe at an early stage, and to ensure that there is political support for arrangements which are put in place.

Post-16 and Special Educational Needs provision:

The approach outlined in the Phase 2 planning application for securing Post-16 and Special Education Needs provision are supported.

Specific Comments:

Environment Statement - Noise

Noise levels are predicted to be below 55dB across most of the site. Although the 2031 Do-Something noise contours across the site indicate that the criteria in BB93 are likely to be met, it must be asserted that further assessment will be required to ensure that these standards will be met. CCC Education have no objection to the location of the schools on noise grounds, however further information is required to give certainty regarding noise emissions to the school sites to demonstrate noise will not be a constraint to development. This particularly relates to the Secondary School and Primary School site PS1, which are more likely to be affected by noise from the guided busway and the primary road.

In the event that planning permission is granted for the proposals a pre-commencement condition should be imposed requiring more detailed noise surveys to determine noise levels to the school sites, with mitigation measures/attenuation to be provided as appropriate. Any mitigation/attenuation as required should be provided by the applicant for the wider development.

On Northstowe Phase 1 application the Environmental Health Officer has recommended a number of conditions with regard to noise and concern regarding noise from the school to the neighbouring residential uses. Whilst CCC do not consider schools buildings to be of noise disturbance to neighbouring residents, it is important that the Environmental Health Officer is happy with the land use arrangements, to avoid any need for mitigation and conditions on the school application at detailed application stage. Officers should discuss this matter with the Environmental Health Officer, prior to determination of the application.

Environment Statement – Ecology

It is stated that the edges of the school fields would be left to grow long, to widen the buffer zones wherever possible and provide cover for wildlife. It is not considered appropriate to set out requirements for internal use of the school site at this stage. Ecological enhancements will be planned at detailed applications stage, along with a number of other educational requirements for the school.

CEMP

The CEMP submitted with the application states that haul routes and operating plants will be sited away from potential receptors such as schools to help control vehicle and plant emissions. This is supported.

Framework Travel Plan

The Framework Travel Plan states that residential parcels of Phase 2 are within an 800m/10 minute walking distance of the secondary school and the majority of homes would be within a 400 metres/five minute walking distance of a primary school. This approach is reasonable and is supported.

Movement and Access Masterplan

The movement and access masterplan continues to show a foot/cycle path through the larger school site. The County Council strongly object to this as it is a major constraint on the effective masterplanning and development of the site for education purposes – especially as it splits the developable area in two. It poses significant challenges in terms of safe-guarding, with an open access path running through the centre of the school site.

HERITAGE COMMENTS:

There are several elements to the heritage of Northstowe: the mitigation (fieldwork) required in advance of development, public engagement with archaeological fieldwork, the presence of designated and non-designated historic assets in and around the development area that will become part of the new town, and the presence of several existing heritage groups and interests in the area.

To begin, the mitigation of each phase of Northstowe will continue to be defined by the Historic Environment Team in discussion with each developer and their agents (D9/a of the NAAP). The delivery of these phases of work is a stipulation of the NPPF, and is to a great extent independent of other heritage activities at or around Northstowe. Nevertheless, the outcomes of these fieldwork phases will provide a great deal of information about the landscape that should be made available to new residents, existing populations and researchers alike (also in line with the NPPF) and D9/d of the NAAP.

The area in and around Northstowe is itself an asset that presents a great opportunity to enrich the new town, and make it more than another housing development. The historic station of RAF Oakington has stories and connections to tell, and it is fantastic that the HCA are looking to keep three non-designated structures alongside the listed pill boxes; finding a sustainable future for all of these is important (D9/c of the NAAP). These are the Guardroom, the Officers' Mess and the Admin Block. Outside the airfield, there are the village cores and the area of Longstanton Paddocks.

There is already a significant and active heritage presence around Northstowe in the surrounding villages. This includes the Longstanton & District Heritage Society, the Oakington & Westwick History Society, and the Churches Conservation Trust at St

Michaels Longstanton, plus there is a new network of aviation museums and interests across Cambridgeshire being created.

Therefore the heritage 'offer' at Northstowe has to achieve the following:

- Tell the story of RAF Oakington
- Provide a forum for the findings of the development – led archaeological work
- Find a use for the designated and non-designated historic assets
- Protect the integrity of the surrounding designated assets (D9/b of the NAAP)
- Engage with new residents and existing populations
- Provide a “sense of place” for Northstowe

This is a broad vision for Northstowe's heritage, and would benefit from a proactive programme of delivery consistent across current and future phases. We would suggest the establishment of a 'heritage vision and master plan' for the new town that can be supported by all parties. This would contain objectives for the heritage assets in and around the development area, proposals for exhibition spaces and the roles of the various local societies. This master plan would be 'owned' by a heritage panel that in turn could give way to a Heritage Trust that ultimately could fundraise, manage and advise the new town.

This approach has several advantages:

- It provides for a joined up approach by all parties with a unified goal and direction for the conservation of heritage assets
- Each member is part of the whole yet keeps their own identity
- It allows heritage to be embedded in the new development at the outset
- It gives a local voice to conservation matters
- Heritage is a good news story: this provides a PR platform
- Ultimately it offers a basis for a Heritage Trust to look after its own interests and fundraise accordingly.
- It can also provide better return for core funding.
- It allows the town to document its own originals: how many places can say that?

There are main heritage and archaeology elements as follows:

- 1) Long term storage of archive: we envisage that the main 'bulk' archive will be lodged with the County Council, for which appropriate costs will be payable; however this archive would also form the basis for displays in the Guardhouse, although the storage requirements are better met elsewhere. This storage cost can be included in the developer funded archaeology costs.
- 2) Public Archaeology: displaying materials, exhibits and presentation/interpretation assuming a suitable venue is available and suitably equipped.
- 3) Display areas: providing the venue for (2) above. This is an unknown at present.
- 4) Management of pillboxes: as designated heritage assets these will need to be looked after.
- 5) Longstanton Paddocks is a non-designated heritage asset that lies between the old and new settlements. It too needs to be managed.

These sites and objectives will require someone on the grounds to deliver, oversee and guide the outcomes, plus to liaise with other stakeholders and views. Obviously there are also the other structures on site to consider.

For these and all the reasons above, we would suggest the creation of a heritage panel with membership from local communities and societies, local authorities and developers. We can then drive the heritage of the area forwards as an integral part of the development.

BROADBAND COMMENTS:

Broadband is now considered the fourth utility and has become a major consideration in the purchase of a new house, as well as being essential to attracting businesses. Its importance is set to grow as more things within the home become connected and as consumers access more services via the internet.

Early provision to new communities is crucial to ensure that developments are attractive places to live and that residents can access the services they need via the internet as well as being able to work from home reducing the impacts of new developments on the local transport network. It also supports the local economy as Businesses are unlikely to be drawn to setting up and operating from a new development that has no access to broadband, limiting the economic growth of the new town. Retrofitting this infrastructure can be costly and also disruptive to the street scene. Failure to have appropriate broadband provision can also lead to a digital divide and issues of social isolation and exclusion for the new residents.

The County Council expects that Northstowe will from the outset have the open access infrastructure needed to enable Broadband providers to connect fibre to homes and businesses. We would also expect the developer to demonstrate that a commercial agreement is in place for Internet Service Provider(s) to connect all premises on the site to the fibre network. This will ensure that residents and business have the connectivity they need and support Northstowe in becoming a thriving community. The County Council expects that this will be secured through the following planning condition:

Superfast Broadband

With the exception of any enabling or infrastructure works, no development shall commence on each reserved matters area of the development until a strategy for the provision or facilitation of broadband to future occupants of that reserved matters area has been submitted to and approved in writing by the Local Planning Authority in consultation with Cambridgeshire County Council. The strategy shall ensure that upon occupation of each dwelling or commercial premises in that reserved matters area, the infrastructure to facilitate fibre optic cables from a site wide network to each dwelling or commercial premises contained within that reserved matters area has been provided in accordance with the approved details. Unless evidence is put forward and agreed in writing by the Local Planning Authority that technological advances for the provision of a superfast broadband service for the majority of potential customers will no longer necessitate below ground infrastructure, the development of the site shall be carried out in accordance with the approved strategy. Other forms of infrastructure, such as facilities supporting mobile broadband and Wi-Fi, should be included where possible and viable. Major infrastructure development must also provide ducting that is available for strategic fibre deployment. The approved strategy shall thereafter be implemented in accordance with its terms.

Reason: *To provide high speed technology and communications in the interests of sustainability to reduce reliance and car-based travel, and to ensure that the needs of future residents to connect to the internet does not necessarily entail engineering works to an otherwise finished and high quality living environment.*

SECTION 106 REQUIREMENTS:

Appropriate Section 106 funding is required to mitigate the impacts arising from Northstowe Phase 2. The County Council would require contributions, in the form of financial contributions and free-serviced land, for a number of services and infrastructure provision. Details of these requirements will be worked through with SCDC as part of the S106 and viability negotiations. As part of the viability discussions it is important that the HCA behaves transparently with the two local authorities on its viability modelling

South Cambridgeshire District Council

Building Control

- Rainwater disposal. Flooding appears to have been adequately addressed.
- Water usage. The proposal to limit use to 110 l/per person per day is welcomed and is well above current regulatory requirements of 125l/per person.
- Energy consumption and carbon reduction initiatives are welcomed and will go some way to arriving at the near zero carbon requirements of the proposed 2016 regulations. The 2016 regulations are not yet available.

Historic Buildings

- Concur with English Heritage's views.
- The current Longstanton Conservation Area Appraisal was adopted in September 2005 so is relatively recent and may not therefore be a high priority for reassessment.

Ecology

This development proposal impacts upon a wide range of habitats and species by virtue of its sheer extent over land which has been allowed to semi-naturalise following cessation. The Environmental Statement (ES) address this point through the standard approach of Ecological Impact Assessment (EclA) developed by the CIEEM.

Bats

Buildings 2, 55 and 56 were found to support roosting bats. Building 5 has the potential to support roosting bats - require further consideration and discussion with the applicant to ascertain the level of information to be provided in the EMP.

One bat tree roost was identified for common pipirelle bat at tree 158. The tree was not considered to be directly affected by any construction work but could be indirectly affected if wooded areas are not properly protected during construction.

Overall the site was not considered to be of any greater importance to bat populations beyond parish to county level. This assessment is accepted.

Lighting and habitat loss associated with the construction of the development has the potential to disturb foraging and commuting bats. A significant effect has been

assigned due to the diversity of bat species that use Long Lane but this impact is only affected at the parish level.

Clearance of trees and other vegetation is also likely to have a short term effect upon bat foraging and commuting routes but is not considered to be significant given that extensive new planting is to be delivered.

Lighting along the greenways and around the waterpark has the potential to significantly reduce the value of these areas to feeding bats. It is very important that careful consideration is given to the type and standard of lighting around.

European Protected Species licences will need to be secured by the applicant from Natural England prior to any activity taking place that could disturb bats or damage their roosts. Compensation will be required and this could take the form of bat boxes and /or features within the proposed buildings. Reference is made in paragraph 10.6.82 to a bat house, this type of species specific habitat enhancement is welcomed. The applicant's ecologist shall be providing further information that will be included in the EMP.

Paragraph 10.6.83 states that further work would need to be undertaken on tree 158 and buildings 2, 22, 55 and 56 to confirm the roost status and to inform the EPS licence. This information should have been collated in order to inform the decision making process that this ES supports. Discussion is needed with the applicant as to why this further survey work is still required. The same discussion is required with regard to the lack of detailed surveys on the scattered trees and potential for light disturbance to a number of waterbodies along the route of the haul road if lighting is required. These discussions are underway and the provision of bat mitigation and update surveys will be in the EMP.

Paragraph 10.6.98 states that pillboxes B11, B12 and B13 would be enhanced as bat roosts. Full details of the means of achieving this are required so that there is a balance between the need to conserve listed structures and to provide for bat conservation.

Badgers

One main badger sett was recorded within the development area and is associated with the grey badger clan. Four distinct badger clans were identified for the Phase 2 area. Whilst this impact is not desirable, with suitable mitigation and the provision of new grassland habitat to provide new foraging, the lasting impact has been considered as only parish level given that badgers are not a rare animal. This is accepted. Repeat surveys will be required prior to developing parcels of land to ensure that badgers have not colonised new sites.

A significant adverse effect on badgers (mainly the grey clan) is likely at the parish level due to the loss of permanent foraging habitat.

A badger licence would be required prior to undertaking any potentially disturbing works. It is also stated that the licence would also cover the creation of an artificial set to compensate for the closure of a main sett (sett 22). Whilst this approach is welcomed, further details are requested on the exact form of the proposed sett and its final location, this should be addressed in the EMP.

A number of badger tunnels would be provided under the proposed busway. However, it is then stated that guide fencing would be provided. This integration of

the guide fencing needs careful consideration if it is not to prevent persons from crossing road. Further discussion/clarification is required as to how the badger mitigation is to properly work.

Water vole and otter

It is considered that otters probably only utilise the site occasionally.

Water voles were not recorded in the development site. They were recorded from the Longstanton Brook. It is not thought that there is a potential for this species to be disturbed by the development works.

Breeding bird survey

A total of 73 species of bird were recorded of which 62 were either confirmed as breeding or were considered as probable breeding on the site. Of particular interest is the probable breeding of 3 Schedule 1 species; quail, barn owl and hobby. The site provides a diverse range of habitats.

Paragraph 10.4.79 states that kingfisher has not been observed in the local area and is not considered relevant to the site. This statement is clearly wrong as they breed on the lake (being called the Kingfisher Lake) adjacent to the golf course in Phase1. However, the breeding presence of kingfisher is not considered to be directly affected by development of Phase2. The provision of new ponds may provide new feeding grounds and artificial nest sites are being provided.

The removal of vegetation during the nesting season poses a real threat to nesting birds. This will be addressed through timing of work (including building demolition). Where active nests are found suitable buffer zones will be put in place. The Ecological Clerk of Works will be responsible for overseeing this mitigation should it be required. This approach is acceptable.

The ES states that white-throat can occur in built-up areas, that statement is not accepted in the context of the new town that Northstowe will present.

Paragraph 10.6.79 makes reference to a barn owl tower. Further details have recently been provided by the applicant and will be taken forward in the EMP.

The intention to provide a range of specialist nest sites for birds is welcomed. The final form of this type of provision should be addressed through the site's design code and Ecological Management Plan.

Some regard has been given to the securement of off-site habitat compensation through the conversion of arable fields to rough grassland at the reserved matter stage. This is not suitable as by that stage development will be commencing and is unlikely to be able to wait whilst any land purchasing/leasing arrangements are resolved. It had been requested that a greater degree of effort was made to secure off-site habitat creation. The failure of that mitigation leaves a significant impact upon farmland species.

Great crested newt

The number of survey visits have now been undertaken in accordance with English Nature's "great crested newt mitigation guidelines".

The GCN peak count was 13, recorded from pond 4 in May 2012. This equates to a medium population. It is believed that GCN are mainly breeding off-site with wandering individuals being recorded away from their main population. The site (or at least part of it) should be considered as providing terrestrial GCN habitat. GCN are assigned district value for the site which is accepted.

The construction of the access road in the southern part of the Main Phase 2 development. This could present a significant adverse effect at the parish level due to habitat fragmentation.

A significant beneficial effect on GCN at the parish level is likely to arise due to the creation of suitable breeding ponds.

Paragraph 10.6.91 contains a confused statement; it appears to have muddled reptiles with amphibians.

Amphibian tunnels will be used in the vicinity of the southern part of the site. Suitable fencing will be used to guide animals to the tunnels. Can the amphibian tunnels be combined with badgers tunnels so that one, or more, tunnels can provide for several different species? Full details of the locations and exact form of the amphibian tunnels is required so that this issue can be properly addressed through landscape design and the EMP.

Common toad survey

The population recorded with an assessment of “low population” being applied to the site. However, paragraph 10.6.138 states that the population estimate maybe an under estimate due to the timing of the survey. The nearby belts of woodland and grassland would be providing important terrestrial habitat for toads and as that habitat is lost to development the population will face even more pressure.

Fish

Fish species, particularly the protected European eel, can be harmed by pumped systems, what measures will be put in place to ensure that eels do not come to harm as a result of pumped systems? More details on this matter are required so that harm caused by pumped systems can be designed out at this stage. The applicant’s ecologist has stated that any dewatering systems will be fully compliant with the Eel Regulations 2009.

Reptile surveys

A suitable number of reptile survey visits have been undertaken. A peak count of 6 lizards was recorded indicating a good population on site. However, lizards were recorded in a patchy distribution across the site. Thus the population associated with the Southern Access Road could be considered as low.

Only 1 grass snake was recorded from the site.

Paragraph 10.6.140 states that reptile refugia were placed down at approximately 3 per hectare, this is a very low survey effort (it is acknowledged current guidelines recommend 5 to 10 refugia per hectare). Given that low numbers of reptiles were being recorded, which strangely contrasts with high numbers in Phase1. Further discussions have been had with the applicant’s ecologist to understand how the

reptile habitat of Phase 2 differs from Phase 1 resulting in markedly different results. The EMP will detail reptile mitigation.

Invertebrate surveys

The ES states "5 species of note were recorded within the disturbed ground and it is considered likely that the value of these habitats is greater than these records indicate." This is effectively acknowledging that further invertebrate surveys would present more notable records; this information should be contained with the ES for analysis. To try to address this, the status of county value has been attributed to the site's invertebrate assemblage. Paragraph 10.6.96 states that further invertebrate surveys will be undertaken at the reserved matters application stage. The EMP is expected to provide the means for agreeing the scope of any further invertebrate surveys.

"The likely effect on the invertebrates is therefore adverse significant at a district level" This statement raises concern, their assessment of the potential invertebrate value of these habitats appears to have been incomplete and it is simply incorrect to think that the informal greenways will provide similar habitats to those that are being lost (with or without added herbivore dung to the new greenways). Commitment to the creation of specialist invertebrate habitats will be secured through landscape design and the EMP. This will provide a degree of mitigation.

The ES acknowledges that invertebrate surveys are inadequate. To simply raise the value assigned to invertebrates to county level is not the right approach as the assemblage of invertebrates may be one of national standing. Greater commitment to invertebrate conservation and habitat creation is required and must be an issue taken forward in landscape design and the EMP.

Hedgerow Regulations surveys were undertaken in June 2013 to repeat the initial assessment of 2004.

Improved grassland

All of the improved grassland would be lost to facilitate the proposed development. Considering the effects on badger and farmland birds the ES considers the impact to be "significant adverse" at the parish level. This is questionable as it has previously been stated that invertebrates utilise the pasture, and invertebrates were considered to be of "county" value. Thus the loss of the improved grassland will have a greater magnitude of impact that is presented in the ES.

Neutral semi-improved grassland

The loss of the relatively small patches of this grassland type are considered to be re-creatable through the creation of species rich grassland in the informal greenways. This view is accepted. However, paragraph 10.6.4 makes a reference to grazing, I cannot envisage that any grazing will take place at Northstowe. However, the applicant's ecologist feels that this is an issue that will be addressed through final landscape design and the EMP.

Arable

The loss of the arable fields. The ES considers this impact to be "significant adverse" at the parish level only. This statement is accepted given the extent of arable land remaining in the parish and beyond. However, the loss of quality arable habitat that

currently provides for important farmland species has not been adequately mitigated for and remains an outstanding issue.

Broad-leaved plantation

The works are not considered to be significant given the remaining tree stock on the site and the potential woodland planting that will result following the development.

Broad leaved scattered trees

In paragraph 10.6.9 it is stated that 5 pedunculate oaks would be transplanted, where to? What preparation work has been undertaken to facilitate this? The planting of new copses and extensive street trees is considered to off-set the loss of trees to facilitate development and the assessment of “not significant” for the magnitude of impact is accepted.

Hedgerows

Landscaping requirements will necessitate new hedgerow planting which will provide compensatory habitat of greater species diversity in the long term.

Paragraph 10.6.132 states that surveys have not been carried out at Larksfield Farm as access was not permitted. The applicant’s ecologist has supplied further information regarding bat surveys at the site. The additional survey is still to be reviewed. It may be appropriate to address any further requirement for ongoing bat survey work through the EMP.

Landscape

Sports Hub and Water Park

- In order to reduce levels from 7.5m (Sports Pitches) down to 4.0m (average water level) and back up to the busway, slopes of 1:3 to 1:4 will be needed – (too steep to walk up). This will form a steep sided engineered gully between the Sports Hub and the Busway – not good for recreation. A similar problem will occur adjacent to the School sports pitches.
- The flow of the landscape between the built edge across the pitches and water park to the wider landscape will be severed by the security fencing likely to be required and other infrastructure associated with the pitches, e.g. floodlights.
- To achieve any kind of gentle, transitional landscape as described in the D&AS the sports areas will need to be lowered or terraced, and/or the all-weather areas moved (probably back into the built area).
- The separate, smaller area of sports pitches to the south east are too close to the proposed housing. How will these relate to the adjacent Phase 1 pitches to the north which are raised by up to 2.5m? Will these need to be raised?

Greenways – Formal Greenways

- The Formal greenways described in section are approximately 23-25m wide. Those shown on the plan are 12-15m wide. Far more space for Greenways is needed than shown on the plans

Greenways – Informal Greenways

- Example 2 of Informal Greenways shown on page 114 does not seem to exist on the plan.
- Where is the open Parkland? Greenways 1 and 3 show 'Open Parkland' 3-6m wide. This is verge, not a park.
- How will the southern informal greenway (connecting to the water park at 4.0m) relate to the adjacent housing (approximately 7.8m)? Again this will produce a deep gully with 1:2 – 1:3 slopes and the proposed landscape shown and described will be impossible to achieve.

Green Separation

- The example on page 115 appears to extend formal landscape uses some-way into the ridge and furrow/archaeology area. This space should remain undisturbed.

Playspace

- There does not seem to be enough space for the proposed NEAP and LEAPs. In a built area a NEAP will require about 70 x 110m or 50 x 90m if facing open countryside.
- A LEAP will require about 37 x 50m in a built area. These will not fit where they are shown in the drawings on page 112.

Green Spaces

- There is no medium to large Public Park or green space associated with the town centre.
- Appears to be no medium or small sized areas of public space within the built areas
- The secondary school (fenced?) and sports hub visually and physically cut off the built areas from the water park and the wider landscape.
- The examples of informal greenway show spaces far larger than that available at Northstowe. Example 5 describes a 'Greenway' of between 12 – 19m wide, containing a road and parking, with 'open parkland' 3-6m wide.

Layout and Roads

- The grid looks too uniform and ridged across the whole phase. This does not relate well to a Fenland Edge.
- There seem to be no destination points at road intersections
- The main access roads from the south join the development at difficult angles. The main boulevard misses the town square.
- Some of the roads look far too wide
- The town square itself is not dominant or different enough. The spaces formed around it do not look pleasant.
- There are no circulation, gathering or other human scale spaces around the schools.
- The built edge facing the Longstanton Conservation area looks very regular. This edge should be more permeable.

Drainage

- The drainage routes look complicated - 5 or more turns.
- Perhaps smaller attenuation areas could form features within the built areas.
- Swales can make a contribution to both the rural and urban areas – however crossings and drainage infrastructure. Chopping the swale into short sections) should be carefully designed and controlled.

Trees

- Generally agree with the findings and recommendations in the arboricultural report of Lockhart Garratt Ltd in respect of the treatment of existing trees and their protection for the duration of the development. An amendment to the report is required, namely that the Hears 151 Steadfast System for the tree protective fencing must be used with soil pins to ensure that they are not easy to reposition for convenience.

Environmental Health

No objection subject to conditions and S106.

Summary

The application documents and Environmental Impact Assessment (EIA) with associated Environment Statement (ES) / Appendices are complex and detailed in many respects.

Following our initial comments dated the 8th December 2010⁴ which should be read in conjunction with this memo, ARUP and Hyder Consulting have responded to our request for further assessment, information and or clarifications for certain environmental health topics and in particular artificial lighting, air quality and noise impact / effects.

On balance we have no objection in principle to the development proposed providing the following environmental health issues are controlled and details approved by condition as recommended to avoid significant adverse impact on existing and future local residents, the wider community / living environment to protect the quality of life / amenity and health. They are also paramount in facilitating a sustainable high quality development and to ensure there is proper service provision:

- Air Quality
- Noise / Vibration effects on both existing and proposed noise sensitive receptors
- Contaminated Land
- Surface Water and Flood Risk including SCDC Awarded Drains
- Operational Waste / Recycling Provision
- Artificial Lighting
- Health Impact Assessment
- Risk of and from Unexploded Ordnance (UXO)
- S106 Planning Obligations

We have the following detailed comments to make and where appropriate officers have recommended draft conditions / informatives for topic assessments that are found to be acceptable in principle, subject to final agreement.

As stated previously as any unacceptable off site traffic impacts related to the increase on traffic levels on local roads as a result of the development, can only be mitigated by off site measures (that cannot be controlled by planning condition attached to the development site), a s106 obligation requiring the applicant under further detailed noise assessment to consider the need for and to implement as appropriate off-site noise mitigation measures to protect or reduce the impact of traffic noise and vibration (e.g. such as noise barriers and sound insulation or improved acoustic glazing / ventilation of residential properties) and other noise

sensitive receivers should be required to ensure the development does not give rise to significant adverse impact.

Chapter 5 - Air Quality

Following a request for further information Hyder Consulting in their email dated the 11/03/2015 have provided additional information in relation to potential air quality impacts / effects.

The additional information is acceptable and providing our recommended air quality related conditions are imposed and s106 contribution for air quality monitoring are included no unacceptable impacts on local or national quality objective are envisaged.

In conclusion the development is unlikely to contribute to or will not result in an unacceptable risk to health or quality of life from either operational or construction related air pollution.

See ARUP draft condition (tracked changes):

- *32. Electric Vehicle charging*

Additional conditions –

- *43. Air Quality Construction Condition &*
- *44. Renewable Energy*

Chapter 6 - Noise and Vibration

This chapter includes a noise assessment that considers:

- the construction and operational noise and vibration impacts emanating from and associated with the proposed main Phase 2 development, on existing residential and other noise sensitive premises. It considers noise and vibration effects on existing receptors / people who are likely to be exposed to changes in noise levels arising from construction and operation of the scheme.
- the suitability of the site for the proposed Northstowe Phase 2 development by assessing existing noise impacts on the site from nearby noise sources including any impact on any future residents and other noise sensitive premises such as schools and recreational spaces that form part of the development itself
- the noise and vibration impacts generated by and inherent to the development and impact on future noise sensitive premises that form part of the development itself
- construction and operational noise effects on existing noise sensitive premises of the Southern Access Road (West) full planning application, which links the proposed Main Phase 2 development area with the B1050 Hatton's Road north of the A14 Bar Hill junction. The traffic noise assessment considers the changes in traffic associated with the new road link.

Following a request for further information Hyder Consulting in their email dated the 02 March 2015 have provided additional information in relation to potential noise impacts / effects.

In conclusion, the majority of construction and operational related impacts effects should not give rise adverse impacts on the health or quality of life of existing and future residential premises and other noise sensitive uses, subject to the following conditions:

See ARUP draft condition (tracked changes):

- 7: EIA Mitigation
- 14: Construction Environmental Management Plans – Site Wide
- 15: Construction Environmental Management Plans – Site Specific
- 16: Construction Working Hours
- 27: Operational Noise – Non Residential Use Classes
- 38: Operational Traffic Noise Mitigation Scheme On-Site
- 42: Operational Odour Control / Fumes:

However two remaining noise issues require further clarification:

1. Operational Traffic Noise Off Site at existing Noise Sensitive Premises from Development Highway Infrastructure etc e.g. Rampton Drift

Although a Major Adverse - Magnitude of Noise Change at Rampton Drift (existing residential premises), is reported in the ES, when this is considered in the context of background noise levels the impact is more likely to be minor to moderate but still requiring possible mitigation.

Hyder consulting confirm that there is also the intention to carry out further detailed and refined noise modelling at the detailed design stages to consider building layout and building heights on site and to consider specific land uses within the Development boundary. This is to include consideration of the overall noise impact from updated traffic data, which will include on-site traffic noise levels, the effects of screening and reflection from onsite buildings at site specific locations as well as at off-site locations. Such modelling with the full development in place, considering on-site traffic movements, will provide a more conclusive and comprehensive assessment of the noise levels at both on-site and off-site receptor locations and the consideration of mitigation as appropriate..

This approach is acceptable for impacts at Rampton Drift providing the draft 41 condition, previously proposed is agreeable to the applicant and is imposed as slightly amended below:

41. Operational Traffic Noise Assessment and Mitigation Scheme Off-Site from Development including Highway Infrastructure

No development of the Southern Access Road (west), the dedicated busway corridor, any proposed primary road corridor and shared busway / primary road corridor shall commence until a detailed traffic noise impact assessment and details of a **strategy or scheme of permanent noise attenuation measures or noise mitigation scheme as appropriate, to protect existing residential premises or other noise sensitive premises off site internally and externally, from traffic noise from the Southern Access Road (west), the dedicated busway corridor, any proposed primary road corridor and**

shared busway / primary road corridor have been submitted to and agreed in writing by the LPA.

The strategy / scheme as approved shall be fully implemented before the use of the Southern Access Road (west), the dedicated busway corridor, any proposed primary road corridor and shared busway / primary road corridor become fully operational and shall be retained thereafter.

REASON: To ensure that sufficient noise attenuation is provided to existing residential properties or other noise sensitive premises off site to protect them from the impact of traffic noise from the Southern Access Road (west), the dedicated busway corridor, any proposed primary road corridor and shared busway / primary road corridor and safeguard the quality of life / amenity and health of residents in accordance with National Planning Policy Framework (NPPF) paragraphs 109, 120, 123 and policy DP/3 Development Criteria and NE/15 of the adopted Local Development Framework 2007

2. Operation Traffic Noise Off Site at existing Noise Sensitive Premises due to an Increase in Traffic Volumes on Existing Local Roads e.g. Hazelwell Cottage

This may appear similar to above but it is different as it is more of an indirect cumulative impact with other phases on the existing local roads and adjacent noise sensitive receptors. The increase in traffic levels on local traffic roads are approaching a noise critical level threshold that is likely to result in a moderate to severe impact and mitigation is proposed e.g. for Hazelwell Cottage “Acoustic screening should be considered for the cottage immediately adjacent to the B1050 as overall noise levels are high. If installation of acoustic fencing is not possible, improved glazing would need to be considered.”

However the impact may be wider than for this single property but until detailed modelling is undertaken the final exact impacts including the degree and extent of impact on residential properties close to local roads cannot be confirmed.

In conclusion it is our view that such impacts / effects once the magnitude of impact is confirmed can be mitigated or addressed adequately by a planning condition or s106 works / mitigation accordingly (as works off site not within redline boundary).

I therefore suggest a variation to the above 41. condition:

Operational Traffic Noise Assessment and Mitigation Scheme Off-Site from Development Highway Infrastructure

No development of the Southern Access Road (west), the dedicated busway corridor, any proposed primary road corridor and shared busway / primary road corridor shall commence until a detailed traffic noise impact assessment and details of a **strategy or scheme of permanent noise attenuation measures or noise mitigation scheme as appropriate, to protect existing residential premises or other noise sensitive premises off site internally and externally, from traffic noise increases on local roads as a result of the cumulative impact of this permitted phase of the Northstowe Development with other phases, including but not exhaustively the Southern Access Road (west), the dedicated busway corridor, any proposed primary road corridor and shared busway / primary road corridor have been submitted to and agreed in writing by the LPA.**

The strategy / scheme as approved shall be fully implemented before the use of the Southern Access Road (west), the dedicated busway corridor, any proposed primary road corridor and shared busway / primary road corridor become fully operational and shall be retained thereafter.

REASON: To ensure that sufficient noise attenuation is provided to existing residential properties or other noise sensitive premises off site to protect them from the impact of traffic noise increases on local roads as a result of the cumulative impact of this permitted phase of the Northstowe Development with other phases, including the Southern Access Road (west), the dedicated busway corridor, any proposed primary road corridor and shared busway / primary road corridor and safeguard the quality of life / amenity and health of residents in accordance with National Planning Policy Framework (NPPF) paragraphs 109, 120, 123 and policy DP/3 Development Criteria and NE/15 of the adopted Local Development Framework 2007

As stated previously as any unacceptable off site traffic impacts related to the increase on traffic levels on local roads as a result of the development, can only be mitigated by off site measures (that cannot be controlled by planning condition attached to the development site), a s106 obligation requiring the applicant under further detailed noise assessment to consider the need for and to implement as appropriate off-site noise mitigation measures to protect or reduce the impact of traffic noise and vibration (e.g. such as noise barriers and sound insulation or improved acoustic glazing / ventilation of residential properties) and other noise sensitive receivers should be required to ensure the development does not give rise to significant adverse impact.

It assumed the HCA are aware than this may entail additional cost.

If the above condition/s in addition to those previously recommended are imposed and the s106 requirements we have requested are included, I confirm that we withdraw our holding objection on noise grounds and duly support this application.

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

Hydrology, Flooding and Drainage-

- During August 2014 close to 70 houses were flooded in Oakington and additional protection would be beneficial as part of the phase 2 works.
- Submitted documents refer to award drains that have been maintained by the MOD in the past (within the site). These watercourses will revert back to SCDC as there is no evidence of any award 'Variation' in the past. The developers will need to locate the awards on site (or confirm they no longer exist) and ensure they are brought up to a suitable standard. Condition requested.
- Under the terms of the Council's Land Drainage Byelaws, a 5-metre maintenance strip must be available at all times along both banks of all awards to allow access for maintenance works. Condition requested.

Drainage Consultant

Documents examined – Hyder's Flood Risk Assessment and Drainage Strategy - August 2014 and Hyder Memo UA006156 dated 10 March 2015.

Following the submission of a memo response to my original comments the inconsistencies and errors in the Flood Risk Assessment and Drainage Strategy have been addressed in the memo and I am content that the proposals, subject to detailed design, will not increase flood risk downstream. The proposals are still at quite a high level and the submission of further information at reserved matters stage should build on the strategy and provide information on how the features will be integrated into the landscape of the development, take advantage of infiltration where appropriate, provide source control and manage water quality.

Adoption remains a concern but it is encouraging that Anglian Water are open to the possibility of adopting the strategic features as in Phase 1, as stated in the memo.

The proposals for the drainage of the Southern Access Road (west) indicated on drawing P1100 show a series of swales/drainage ditches and ponds that intercept and control the flow to 1 litre per second per hectare for all events up to a 1 in 200 year + 30% for climate change. This accords with the requirements of the IDB requirements in terms of flow rate and is less than the greenfield runoff rate. The proposals are therefore adequate, subject to further detailed design.

Geology, Hydrogeology and Soils

The following comments have been provided Peter Ord, Scientific Officer, Contaminated Land, Growth Areas & Planning Team, Environmental Commissioning, Health & Environmental Services:

"The Environmental Statement contains a chapter entitled "Northstowe – Geo-environmental Assessment and Outline Remedial Strategy Report, August 2014 prepared by Hyder for HCA.

A draft version of this report was submitted to us for comment in July of this year and our comments are included in Appendix G. Our comments on the final version of the report are unchanged.

We have reviewed the report and generally agree with the findings. We do have the following observations to make, mostly in order to confirm proposals for additional works. Currently further works are described as:

1. Further gas monitoring is proposed to bring data up to date, and to re-investigate an area of potentially flawed readings
2. Zetica need to submit their report on UXO to be read in conjunction with this report
3. Site Specific Risk Assessment will be prepared for construction workers as they are not subject to long term exposure therefore didn't fall into this category
4. A Detailed Remedial Strategy taking into account the different zones and proposed development areas will be prepared.
5. Additional Investigation is proposed in previously restricted areas such as the former Oakington Immigration Centre in Zone C, and the former Bomb Storage area in Zone B
6. Additional groundwater monitoring is proposed

We agree with this scope of additional works.

Hyder have split the future proposals into areas of contaminants or Type: Inorganic, Organic, Asbestos, Radiological, Groundwater, Gas, Utilities, Watching Brief and Verification.

We agree with the proposals submitted surrounding these areas.

We agree with the proposal to prepare and submit a Waste Management Plan.

We agree with the conclusions and recommendations of the report.

We advise that a full Contaminated Land Condition is applied along these lines:

- a) The application site has been subject to a detailed scheme for the investigation and recording of contamination and remediation objectives have been determined through risk assessment and agreed in writing by the Local Planning Authority.
- b) Detailed proposals for the removal, containment or otherwise rendering harmless any contamination (the Remediation method statement) have been submitted to and approved in writing by the Local Planning Authority.
- c) The works specified in the remediation method statement have been completed, and a Verification report submitted to and approved in writing by the Local Planning Authority, in accordance with the approved scheme.
- d) If, during remediation works, any contamination is identified that has not been considered in the remediation method statement, then remediation proposals for this material should be agreed in writing by the Local Planning Authority.

Reason – To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy DP/1 of the adopted Local Development Framework 2007

It should also be noted that due to the range and extent of potential land contamination on site our service have requested a financial contribution to assist in the review of submitted contaminated land reports or similar.

The final precise wording of any contaminated land condition should be agreed with this service”.

Alternatively see ARUP draft condition (tracked changes):

11. Contaminated Land Investigation and/or Remediation

Waste Generation and Management / Waste and Recycling

We are still negotiating the waste collection solution for high density areas with HCA, but we have agreed a draft condition as amended in order to not preclude underground bank or alternative (non-default system) option at this stage.

It is concluded that an acceptable and a workable system can be approved when this matter is given further detailed design consideration and therefore control can be

retained by the imposition of an Operational Waste Generation and Management / Waste and Recycling Provision type condition is recommended:

See ARUP draft condition (tracked changes):

40. Waste Management Strategy

In conclusion we have no objection in principle subject to the recommended draft condition.

Artificial Lighting Impact

The additional information / response provided by ARUP by email dated the 12th February 2015 is acceptable.

We conclude that artificial lighting impact has been satisfactorily assessed in terms of potential significant impacts and effects on humans such as residential receptors. The typical mitigation measures outlined / detailed that that could be considered are in accordance with industry best practice and guidance.

However any artificial lighting that is to be installed will need to be approved at the detailed design and an artificial lighting impact assessment and scheme type condition is recommended to limit the impact of light pollution from artificial light on local amenity–

see ARUP draft condition (tracked changes) 26. External Artificial Lighting

Risk of and from Unexploded Ordnance (UXO)

Unexploded Ordnance (UXO)

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 during WWII. 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.

The Northstowe development site has been subject to previous UXO detailed desk top surveys and electromagnetic geophysical (high performance magnetometer surveys) site surveys including those undertaken by undertaken by Bactec (Bomb Disposal Specialists) and similar organisations such as the RAF, to identify any risk associated with any buried ordnance and munitions.

More recently, Zetica (engineering and environmental geophysics consultants - jointly appointed by Gallaghers and the HCA) comprehensively reviewed previous UXO studies and clearance history etc for the entire site. They also produced a recent up-to-date UXO risk management and mitigation programme / plan which have been approved for Phase 1.

This approach is acceptable and the same or similarly worded UXO clearance / mitigation condition to that imposed on the Phase 1 outline permission is likely to be required.

It is our view that a UXO condition is required – see ARUP draft condition (tracked changes) 13. Unexploded Ordnance (UXO)

S106 Planning Obligations

The Planning statement has a section on Planning Obligations which states that without prejudice to any negotiations that will take place during the determination process, an overview of the areas where obligations are considered to be required for Phase 2 are listed.

These are noted but in addition and as with phase 1 we are also likely to request a financial contribution related to the following:

- Provision of domestic waste and recycling receptacles
- Neighbourhood bring recycling sites
- Award drainage maintenance
- Noise and air quality monitoring
- Contaminated land review / watching brief

Strategic Housing

- The affordable housing requirement based on policy HG/3 (40%) would be 1400 dwellings subject to viability. The applicant is only offering 20% affordable housing and to date has provided no viability justification for the reduction in the affordable housing percentage.
- It is disappointing that the HCA cannot commit to setting its own size and environmental standards over and above local or national policy.
- Neither the planning statement nor the affordable housing strategy give any indication on how the affordable housing is to be delivered or by who.