Greater Cambridge Partnership
Cambourne to Cambridge
Scoping Opinion Response Tracker

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C2C scoping response

Scoping opinion comment	WSP Discipline	WSP owner	WSP response	Action	Status
Department for Transport					
Point 8: The ES should provide full details of the scheme, to include how many vehicles and passengers are expected to use the public transport, and the hours and days of operation initially and in the future.	Traffic and Transport	Gerry Corrance	These comments are reasonable. Note that passenger transport arrangements are not the responsibility of the Transport Planning team and that bus services frequencies, routes and passenger numbers will be expected from GCP.	PT information to be provided by others.	Noted
Point 9: Consideration should be given to the following points when undertaking your assessment: • the cumulative impact of all planned development within the local area; • the risks of air pollution and how these can be managed or reduced; • any strategic solutions which may be being developed or implemented to mitigate the impacts on air quality.	Air Quality	Carol Chan	Noted	- Cumulative impacts of all planned development within the local area will be considered in the assessment. - the risk of air pollution and mitigation will be assessed as detailed in the methodology. - Strategic solutions will be reviewed in the assessment.	Agreed and adopted
Point 10: A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant planning permission. Table 6-1 within the EIA Scoping Report should be kept up to date with the relevant survey guidance. The age of ecological survey work should accord with CIEEM advice note on the Lifespan of Ecological Reports & Surveys.	Ecology	Sam Mardell	Noted. The 2022 survey scope has been designed to ensure a robust and up-to-date baseline is completed to inform the ES.	No immediate action required	Noted
Point 11: Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area.	Ecology	Sam Mardell	Noted. Updated biological records obtained from CPERC in 2022.	No immediate action required	Noted
Point 12: Eversden and Wimpole Woods Special Area of Conservation (SAC) is designated for the presence of barbastelle bats. There are also records of a barbastelle maternity colony at Madingley Woods SSSI. The SAC is located within 7km of the project and therefore a Habitat Regulations Assessment (HRA) will be required. Impacts will need to be considered alone and in combination with other plans and projects.	Ecology	Sam Mardell	Noted. As above, effects on Eversden and Wimpole Woods SAC will be assessed in the HRA	No immediate action required	Noted
Point 13: Barbastelle bats are known to forage up to 20km from their main roosting sites and habitat within this range may be important to the maintenance of the local barbastelle bat population. The EIA Scoping Report acknowledges that the Proposed Scheme is located within the potential foraging range of the SAC barbastelle population. Natural England welcomes confirmation that the potential effects of the Scheme on SAC barbastelle foraging and commuting habitat, which may be functionally linked to the SAC, will be addressed through the ES and HRA. In addition to the Bourn Airfield development, this will need to consider the findings of bat survey work undertaken for other relevant projects such as the A428 Black Cat Roundabout to Caxton Gibbet Improvement Scheme and the East West Rail project. Reference should be made to the Greater Cambridge Biodiversity Supplementary Planning Document (SPD) which provides guidance on protecting bats, including Eversden and Wimpole Woods SAC barbastelles, through development.	Ecology	Sam Mardell	Noted. The HRA will consider the findings of bat survey work undertaken as part of other relevant projects in the area, including Bourn airfield, A428 Black Cat and EWR.	No immediate action required	Noted

C2C scoping response

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Point 14: The development site is within or may impact on Madingley Wood Site of Special Scientific Interest (SSSI); Caldecote Meadows SSSI; Hardwick Wood SSSI; Eversden and Wimpole Woods Site of Special Scientific Interest (SSSI). The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSIs (either individually or in combination with other developments), and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are interest features of the SSSI, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a site, for example by being linked hydrologically or geomorphologically.	Ecology	Sam Mardell	Noted. Effects on designated sites will be considered in the ES and HRA (covering Eversden and Wimpole Wood SAC/SSSI) taking into account functionally linked land.	No immediate action required	Noted
Point 15: Natural England note from the ES Scoping Report that eleven non-statutory nature conservation sites are located within 1km of the Proposed Scheme. The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves.	Ecology	Sam Mardell	Noted. Impacts on local wildlife sites will be considered in the ES.	No immediate action required	Noted
Point 16: Natural England recommend that the ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains such as the Nature Recovery Network and the Cambridge Nature Network. Reference should also be made to guidance set out in the Greater Cambridge Biodiversity SPD and the objectives and targets of the Cambridgeshire Green Infrastructure Strategy, as outlined in the consultation response from Natural England.	Ecology	Sam Mardell	Noted	The ES will make reference to these wider strategic initiatives in reflecting on opportunities for environmental and biodiversity net gain	Agreed and adopted
Point 17: Natural England advise that the ES should also identify how the development impacts the natural environment s ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment s contribution to achieving net zero by 2050. Natural England s Carbon Storage and Sequestration by Habitat report (2021) and the British Ecological Society s nature-based solutions report (2021) provide further information.	GHG	Bethan Hill	Noted	WSP will include land use change in the assessment of the operation phase (PAS2080 B8) for GHG.	Agreed and adopted
Point 18: Consideration should be given for the study area to include the population profile of people who will be affected during the construction and operational phases.	Community and Human Health Land Use and Take	Correne Murray	To be addressed in the Population and Human Health assessment.	No immediate action required	Noted
Point 19: The Secretary of State notes that the development could have an impact on both designated and undesignated heritage assets and their settings, and your attention is drawn to the specific detailed comments and advice from Historic England on historic environment matters in its response. In preparation of the ES consideration should be given to advice from Local Authority Conservation Officers and Archaeological advisers.	Heritage	Janette Platt	We confirm our intention to liaise (email and/or phone), where necessary, with the local planning authority (LPA) Archaeological Advisor and Conservation Officer. These discussions have already commenced.	WSP Cultural Heritage & Archaeology team to liaise, where necessary, with the local planning authority (LPA) Archaeological Advisor and Conservation Officer.	Noted

C2C scoping response

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Point 20: The EIA Scoping report highlights five grade II* listed buildings within the study area (10.5.6) although only lists 4. Historic England advise that the ES should include an assessment of the Grade II* listed chapel (LEN 1376611) at the American cemetery and the other Registered Parks and Gardens of colleges that sit adjacent to the Clare College, and the West Cambridge Conservation Area.	Heritage	Janette Platt	The Grade II* memorial chapel (NHLE: 1376611), the American cemetery registered park & garden and the Clare College registered park & garden are already included in the assessment, since all are within the 250m study area. The West Cambridge Conservation Area is also included in the assessment and will be covered by a separate Heritage Statement, which will form an appendix to the ES, since there will be a physical impact on the conservation area as a result of the scheme. We can see the logic in including the Kings College registered park and garden, given its location in relation to the scheme, but are not convinced of the merits of including the other registered parks & gardens associated with the university colleges in this area since we are not sure that the scheme will impact their significance (indeed it is doubtful that it will impacts the significance of the Clare College and Kings College registered park & gardens either since their key relationships will be with the colleges (i.e. inward looking) rather than the looking outwards towards the scheme.	Kings College registered park & garden (adjacent to Clare College RPG) to be included in the assessment, though likely to be scoped out of the ES on the basis of significance of effect.	Agreed and adopted
Point 21: Historic England recommend that the applicant seek a wider scope for the assessment then 250m in the first instance, and then focuses down on those assets where there is likely to be a significant effect identified.	Heritage	Janette Platt	Based on our professional judgement a 250m study area is sufficient to determine the likely nature, extent, preservation and significance of any known or possible buried heritage assets (archaeology) that may be present within or adjacent to the site, since there have been a large number of past archaeological investigations in such a study area. Where it is deemed helpful to the understanding of the archaeological potential of the site, however, reference will be made to heritage assets and past investigations outside this study area. With regard to built heritage/designated assets a 250m study area has been chosen as a guideline but we have also considered heritage assets outside the study area and will include them in the ES where a significant effect is anticipated.	We propose to continue to use a 250m study area, but will also consider heritage assets outside the study area, where relevant. Additional information with regard to our assessment of the impact of the scheme on these assets will be included in the Historic Environment Desk Based Assessment included as an appendix.	Noted
Point 22: Historic England note the applicant intends to produce an LVIA (see Chapter 11) and recommend the LVIA is supplemented with heritage specific viewpoints (both photographs and photomontages) that illustrate the ES and support the results of the heritage assessment. If these are to be presented in the Landscape and Visual chapter, then the assessment needs to be clearly set out and cross referenced with the heritage chapter.	Landscape	Chris Carolan	Viewpoints currently include heritage assets and will be agreed in consultation. The GCP Landscape, Ecology and Heritage working group has been advised of the proposed viewpoints and have been invited to comment. This group includes relevant heritage consultees at the city, county and national scale.	LVIA to include heritage specific viewpoints	Agreed and adopted
Point 23: The Environment Agency advise that the Bin Brook is identified as a Water Framework Directive ("WFD") waterbody. The Environment Agency advise that a proposed new bridge structure over Bin Brook could increase shading and potential damage and deterioration of aquatic habitats. The Environment Agency recommends that the Water Framework Direction information is used to assess the impact on its current WFD status alongside biodiversity impacts as part of the Environmental Assessment.	Water	Steph Harberfield	A WFD Screening and scoping assessment is proposed and will identify the need for any further assessment.	No immediate action required	Noted

C2C scoping response

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Point 24: The Environment Agency highlight that while the proposed C2C Scheme does not include areas within a groundwater Source Protection Zone, it does include areas designated to have high , medium – high and 'medium' groundwater vulnerability associated with underlying Principal and Secondary Aquifers. The proposed C2C Scheme route is therefore vulnerable to pollution, since contaminants from the development may enter and pollute underlying aquifers and in turn impact surface water bodies. Due consideration should be given to the impacts that the C2C Scheme may have upon controlled waters receptors during both construction and operational phases.	Water	Steph Harberfield	Noted. The surface water drainage strategy will be designed in accordance with the SUDS Manual and SUDS Indices approach will be undertaken to demonstrate sufficient pollution control measures are in place.	Surface water drainage team to consider and address	Agreed and adopted
Point 25: The Environment Agency highlight that a number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels.	Water	Steph Harberfield	• The C2C scheme will have very low traffic rates, with hybrid vehicles assumed (and electric vehicles likely) and as such will not have a significant impact on the local air and water quality as a result of the scheme. • Natural England s neutrality requirements are in relation to schemes including overnight accommodation and as such not deemed to be relevant to the C2C scheme. • The surface water drainage system will be designed in accordance with best practice and will incorporate SUDS which will help to treat and disperse any pollutants from the surface water drainage system. • The water dependant conservation sites (assumed to be the SSSIs) are not hydraulically connected to the surface water receptors within the study area	No immediate action required	Noted
Point 26: The Secretary of State notes that the Environment Agency set out that due consideration should be given to the impacts that the C2C Scheme may have upon controlled waters receptors during both construction and operational phases.	Water	Steph Harberfield	Noted. This is part of the scope. It should be noted that project will commit to use of all necessary best practice measures to minimise this risk such that a significant effect will not occur. For example, see Point 24 above.	To be considered in the CoCP and surface water drainage strategy.	Noted
Environment Agency					
While the proposed C2C Scheme does not include areas within a groundwater Source Protection Zone, it does include areas designated to have high , medium – high and 'medium' groundwater vulnerability associated with underlying Principal and Secondary Aquifers. Principal aquifers are geological strata that exhibit high permeability and provide a high level of water storage. They support water supply and river base flow on a strategic scale. Secondary aquifers are often capable of supporting water supplies at a local scale and normally provide an important source of flow to some rivers. The areas of higher groundwater vulnerability are where principal bedrock is at or near the surface. Sensitive surface water features in the vicinity of the C2C Scheme (including Bin Brook and various land drains) are likely to be in continuity with groundwater. A series of springs are noted within Coton, feeding into Bin Brook, associated with an outcropping of the chalk bedrock Principal Aquifer. The proposed C2C Scheme route is therefore vulnerable to pollution, since contaminants from the development may enter and pollute underlying aquifers and in turn impact surface water bodies.	Water	Steph Harberfield	The surface water drainage strategy will be designed in accordance with the SUDS Manual and SUDS Indices approach will be undertaken to demonstrate sufficient pollution control measures are in place.	Surface water drainage team to consider.	Noted
Due consideration should be given to the impacts that the C2C Scheme may have upon controlled waters receptors during both construction and operational phases.	Water	Steph Harberfield	Noted. This is part of the scope. It should be noted that project will commit to use of all necessary best practice measures to minimise this risk such that a significant effect will not occur. For example, see Point 24 above.	To be considered in the CoCP and surface water drainage strategy.	Noted

C2C scoping response

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We refer the applicant to our groundwater position statements in The Environment Agency s approach to groundwater protection available from gov.uk. This publication sets out our position for a wide range of activities and developments, including: infrastructure, land contamination, discharges to ground, groundwater resources and waste management. We have provided below some general comments on various aspects of the proposals as they affect controlled waters receptors. Further generic advice is provided within Appendix 1.	Water	Steph Harberfield	Noted		Noted
We are pleased to note that the scoping report lists potential sources of contamination identified to date and acknowledges a requirement for ground investigation (along with groundwater monitoring as appropriate) across the C2C Scheme to confirm ground conditions and any contamination within the soils or groundwater (if present). The proposed C2C Scheme route should be assessed to identify all potentially contaminative land uses. We would draw your attention to the potential for mobilising contaminated groundwater from contaminated sites. Where the C2C Scheme route impinges upon land that may have been affected by contamination as a result of its previous uses, or the uses of surrounding land, sufficient information should be provided with any planning application, in the form of a Preliminary Risk Assessment (PRA), to provide assurances that the risks to controlled waters are fully understood and can be addressed through appropriate measures. Where potentially viable pollutant linkages are identified, further investigation/assessment and remediation works may be required. The potential impacts on groundwater quality and water abstractions (private and public) within the study area should be considered.	Soil, Geology and Land Contamination	Alex Mann	Noted. This is part of the scope	Contaminated land team are involved with the scoping of the ground investigation and will schedule samples dependent on historic land use. Motts have previously completed contaminated land risk assessment.	Noted
Where applicable the risks associated with piling/ground improvement and infiltration drainage should be included within this scheme. Piling, other ground improvement methods and infiltration drainage could have an adverse impact on the groundwater quality within the aquifers beneath the scheme site or provide preferential pathways for contaminant migration to the aquifers during construction and after the completion of the development.	Water	Steph Harberfield	Piling works will be limited, though we acknowledge will be required in some locations	Should it be required , a piling works risk assessment will undertaken by the contaminated land team	Agreed and adopted
We support the use of sustainable drainage systems (SuDS) for surface water management where they do not present a risk to controlled waters. Infiltration SuDS need to meet the criteria in our Groundwater Protection Position Statements G1 and G9 to G13, however, and must not be constructed in contaminated ground where they could cause the remobilisation of contaminants into controlled waters receptors. We would expect any SuDS to have mitigation measures in place to allow for treatment of and reduction in contaminant levels in the surface water run-off. SuDS should be constructed in line with good practice and guidance documents which include the SuDS Manual (CIRIA C753) and the Susdrain website.	Water	Steph Harberfield	Noted. The surface water drainage strategy will be designed in accordance with the SUDS Manual and SUDS Indices approach will be undertaken to demonstrate sufficient pollution control measures are in place.	Surface water drainage team to consider.	Noted
Advice from the Lead Local Flood Authority (LLFA) should be sought for comments on other aspects of the surface water drainage scheme.	Water	Steph Harberfield	Noted. Consultation with the LLFA will be undertaken as part of our scope	No immediate action required	Noted

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Aquifer dewatering is also not mentioned and should also be addressed if it is likely to be required. Early discussion of requirements is recommended for all potential groundwater abstraction permissions for dewatering. Due consideration should be given to the potential impacts of any aquifer dewatering of excavations during the construction phase of the development. There are requirements to identify at-risk water users and features, to assess the impact of dewatering upon these, and to determine any monitoring and/or compensation measures that might be required for their protection. The implications of dewatering in proximity to contaminated sites should also be considered. Please note that since 1 January 2018 most cases of new dewatering operations above 20 cubic metres a day will require a water abstraction licence from the Environment Agency prior to the commencement of dewatering activities. If applicable, these issues should be considered within the scope of a hydrogeological impact assessment. Relevant guidance is available at https://www.gov.uk/government/publications/temporary-dewatering-from-excavations-to-surface-water and https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence.	Water	Steph Harberfield	If required consultation with the EA will be undertaken.	Groundwater team to advise as design details are developed.	Agreed and adopted
Due consideration should be given to waste management during the construction phase of the development. Excavated material will need to be appropriately managed and its suitability for re-use will need to be demonstrated. If any materials are to be reused along the scheme route, we expect them to be appropriately characterised. Similarly, any soil material that will be disposed of off-site we also need to be appropriately characterised.	Materials Assets and Waste	Sara Claxton	Noted	The management of site arisings and waste will be assessed in the ES, based on information provided at the time of the assessment. Classification of materials for reuse and/or disposal would be carried out by the main contractor on the Scheme. This will be noted in the ES.	Agreed and adopted
If the CL:AIRE Definition of Waste: Development Industry Code of Practice (DoWCoP) is to be followed, a Materials Management Plan will be required to be produced specifying what information must be gathered and documented. The decision to use the DoWCoP is the responsibility of the holder of the materials. Materials illegally deposited or deposited at inappropriate sites may be subject to relevant landfill taxes, payable by all parties. Only robust due diligence is a defence against joint liability. Materials not used in accordance with the DoWCoP process in full may be deemed waste and will require a relevant permit for deposit. Soil re-use and import criteria should be set to be suitably protective of controlled waters. A declaration must be submitted by a Qualified Person (QP) registered with CL:AIRE before any use of materials on site or transfer is permitted. If the site meets the tests that materials are suitable for re-use, certain to be re-used, are not excessive in volume and pose no risk to the environment or harm to human health then the QP can make a declaration via CL:AIRE. A verification report is required to be completed at the end of the project and a copy submitted to CL:AIRE. Further details of the scheme are available on the CL:AIRE website.	Materials Assets and Waste	Sara Claxton	Noted	No immediate action required	Noted
We agree with paragraph 15.6.1 that a Flood Risk Assessment should accompany the scheme to assess the impact of the scheme on the flood zones associated with the Bin Brook. Flood data can be requested from enquires_eastanglia@environment- agency.gov.uk. You will need to ensure climate change is assessed as part of this following the advice at Flood risk assessments: climate change allowances - GOV.UK (www.gov.uk).	Water	Steph Harberfield	Noted. We note also that the EA has updated its climate change allowances since publication of the Scoping Opinion, which will be relevant to the assessment.		Noted
Historic England					

C2C scoping response

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This broadly concurs with our own analysis, although we would want to ensure the assessment is extended to include the Grade II* listed chapel (LEN 1376611) at the American cemetery and the other Registered Parks and Gardens of colleges that sit adjacent to the Clare College. These assets for example the gardens at Trinity and Kings Colleges form a consistent group of gardens associated with other significant and highly graded listed buildings at east end of the development area.	Heritage	Janette Platt	**See point 20 of the DfT comments**		
The assessment we feel should also pick up these assets and would also need to include the West Cambridge Conservation Area.	Heritage	Janette Platt			
We are also concerned by the use of a 250m study area for the assessment of impacts. Whilst we appreciate the assessment needs to be focused - the 250 m area is in our view an arbitrary one. We would rather the applicant seek a wider scope for the assessment, and then focus down on those assets where there is likely to be a significant effect. Additional information would be provided in appendices to support the ES.	Heritage	Janette Platt	**See point 21 of the DfT comments**		
Ideally, we would like to see the use of a Zone of Theoretical Visibility (ZTV) model to look at the scope for including wider designated heritage assets that have ether prominent views or dominate in a wider landscape. We've noted the colleges and their gardens above, but another example would be Cambridge Castle. This is a scheduled monument and highly significant designated heritage asset. It is currently outside the study zone but is close to the development and has both height and public accessibility.	Heritage	Janette Platt	A ZTV model is will be produced for the ES by the WSP Landscape team. It will include heritage assets including scheduled monuments and listed buildings.	WSP Cultural Heritage & Archaeology team to liaise with the WSP Landscape team to agree heritage viewpoints for the ZTV model, including Cambridge Castle.	Noted
We also note the statement in the scoping report (10.5.15) about the impact on non-designated heritage assets and another archaeological sites. We consider this is primarily a matter for the Planning Authority and their archaeological advisors, however we also recommend supporting documents such as survey or evaluation reports of the DBA should be included as appendices.	Heritage	Janette Platt	Noted. We were already intending to include supporting documents as appendices to the ES Chapter.	Supporting appendices will include the Historic Environment Desk Based Assessment (HEDBA), a Heritage Statement for the West Cambridge Conservation Area and reports of any archaeological fieldwork conducted to support the planning application.	Noted
We note the applicant intends to produce an LVIA (see Chapter 11) and we recommend the LVIA is supplemented with heritage specific viewpoints (both photographs and photomontages) that illustrate the ES and support the results of the heritage assessment. If these are to be presented in the Landscape and Visual chapter, then the assessment needs to be clearly set out and cross referenced with the heritage chapter. Ideally though a separate heritage viewpoints appendix should be produced	Heritage	Janette Platt	An LVIA will be produced by the WSP Landscape team.	WSP Cultural Heritage & Archaeology team to liaise with the WSP Landscape team to agree heritage viewpoints and use the resulting LVIA to illustrate the heritage assessment. This will be cross-referenced with the Landscape & Visual chapter.	Noted
	Landscape	Chris Carolan	As per point 22 above, viewpoints currently include heritage assets and will be agreed in consultation. The GCP Landscape, Ecology and Heritage working group has been advised of the proposed viewpoints and have been invited to comment. This group includes relevant heritage consultees at the city, county and national scale.	LVIA to include heritage specific viewpoints	Agreed and adopted
The setting of heritage assets is not however just restricted to visual impacts and other factors should also be considered in particular noise, light, traffic and assessments. Where relevant, the cultural heritage should also be cross-referenced to other relevant chapters, and as above we advise that all supporting technical heritage information is included as appendices.	Heritage	Janette Platt	It was our intention not to restrict the assessment of the setting impact to visual impacts and to consider noise, light and traffic assessments. Relevant chapters will be cross-referenced as appropriate.	Other relevant chapters to be cross-referenced as appropriate.	Noted
	Acoustics	Toby Lewis	If particular heritage assets are identified as noise sensitive, we can quantity the potential change in noise levels anticipated to result from the scheme.	Comment noted. No immediate action.	Agreed and adopted

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	Traffic and Transport	Gerry Corrance	Comment regarding traffic and setting of heritage assets noted. Transport Planning team needs to be advised which Heritage assets are to be considered within the ES Transport chapter.	Comment noted. No immediate action.	Agreed and adopted
We strongly recommend that the applicant involve the County Councils specialist advisers on archaeological matters and we recognise that they are best placed to provide advice on non-designated heritage assets and to give advice on how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; and of any required mitigation measures. Likewise the local Conservation Officer will need to be consulted in relation to the built environment.	Heritage	Janette Platt	We confirm our intention to liaise (email and/or phone), where necessary, with the local planning authority (LPA) Archaeological Advisor and Conservation Officer. Discussions with county have already commenced.	WSP Cultural Heritage & Archaeology team to liaise, where necessary, with the local planning authority (LPA) Archaeological Advisor and Conservation Officer.	Noted
Whilst standardised EIA matrices are considered in some planning practices to be useful tools, we consider the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems. Historic England therefore recommends that these should be in an appendix and seen only as material to support a clearly expressed and non-technical narrative argument within the cultural heritage chapter.	Heritage	Janette Platt	Noted	This will be covered in the HEDBA, which will be a supporting appendix.	Noted
	EAC	Ellie Simpson	WSP supports this position and acknowledges the importance of professional judgement in ascribing significance, and use of an evaluation matrix as one element only	Ensure that this more informed approach to significance is reflected in the ES	Agreed and adopted
The ES should also use the ideas of benefit, harm and loss (as described in NPPF to set out what matters and why in terms of the heritage assets significance and setting, together with the effects of the development upon them. Alongside appropriate mitigation to offset adverse effects on heritage assets we are also looking for explicit and demonstrable heritage enhancements and benefits from the scheme to be set out clearly in the application. This could include Interpretation, public engagement in the archaeological discoveries, heritage education and heritage focus in relation to design and placemaking.	Heritage	Janette Platt	Noted. It was already our intention to use the ideas of benefit, harm and loss (as described in NPPF to set out what matters and why in terms of the heritage assets significance and setting, together with the effects of the development upon them.	We will set out what heritage benefits and enhancements from the scheme in the ES.	Noted
	EAC	Ellie Simpson	Identification of benefits will be key. Mitigation is required to address significant effects, and is deemed effective where a significant effect is made non significant. However, this will not preclude measures to go further if they are available and practicable, and can be secured through the Order.	Identify and record commitments to deliver benefits	Agreed and adopted
Given the designated heritage asset within the area, we would welcome further discussions with the applicant in order to refine the approach to the scope of the ES, to the assessment, enhancements and mitigation.	Heritage	Janette Platt	Clarification on HE recommended scope will help focus on the issues of concern, recognising the EIA focus on likely significant effects. Where WSP can clearly demonstrate absence of such effects in advance of any detailed assessment, our recommendation will be to omit them from the assessment.	WSP to have further discussions with HE to hone scope of the assessment	Agreed and adopted
Natural England					
The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.	Ecology	Sam Mardell	These are part of the scope	No immediate action required	Noted
The development site is within or may impact on Eversden and Wimpole Woods Special Area of Conservation (SAC), located approximately 6.5km to the south of the Proposed Development, is designated for its maternity colony of barbastelle bats. Natural England welcomes confirmation that the potential effects of the Scheme on SAC barbastelle foraging and commuting habitat, which may be functionally linked to the SAC, will be addressed through the ES and HRA.	Ecology	Sam Mardell	Noted	No immediate action required	Noted

C2C scoping response

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In addition to the Bourn Airfield development, this will need to consider the findings of bat survey work undertaken for other relevant projects such as the A428 Black Cat Roundabout to Caxton Gibbet Improvement Scheme and the East West Rail project. Reference should be made to the Greater Cambridge Biodiversity Supplementary Planning Document (SPD) which provides guidance on protecting bats, including Eversden and Wimpole Woods SAC barbastelles, through development.	Ecology	Sam Mardell	See point 13 of the DfT comments		
Should a likely significant effect on a European/Internationally designated site be identified (either alone or in-combination) or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an appropriate assessment in addition to the consideration of impacts through the EIA process. Further guidance is set out in Planning Practice Guidance on appropriate assessment https://www.gov.uk/guidance/appropriate-assessment This should also take into account any agreed strategic mitigation solution that may be being developed or implemented in the area to address recreational disturbance, nutrients, or other impacts.	Ecology	Sam Mardell	Noted. An appropriate assessment will be undertaken as part of the HRA process.	No immediate action required	Noted
The development site is within or may impact on the following Sites of Special Scientific Interest: • Madingley Wood Site of Special Scientific Interest (SSSI) 0.3km to the north; • Caldecote Meadows SSSI 1.6km to the south; • Hardwick Wood SSSI 1.7km to the south; • Eversden and Wimpole Woods Site of Special Scientific Interest (SSSI) 6.5km to the south.	Ecology	Sam Mardell	Noted. These will be reflected in the ES	No action	Noted
The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are interest features of the SSSI, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a site, for example by being linked hydrologically or geomorphologically.	Ecology	Sam Mardell	Noted. Effects on designated sites will be considered in the ES and HRA (covering Eversden and Wimpole Wood SAC/SSSI) taking into account functionally linked land.	No immediate action required	Noted
We note from the EIA Scoping Report that eleven non-statutory nature conservation sites are located within 1km of the Proposed Scheme. The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 174 and 175). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the local wildlife trust, geo-conservation group or local sites body in this area for further information.	Ecology	Sam Mardell	Noted. Impacts on local wildlife sites will be considered in the ES with mitigation and compensation built in at the design stage.	No immediate action required	Noted
The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.	Ecology	Sam Mardell	Noted. Updated biological records obtained from CPERC in 2022.	No immediate action required	Noted

C2C scoping response

Scoping opinion comment	WSP Discipline	WSP owner	WSP response	Action	Status
The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.	Ecology	Sam Mardell	Noted. All surveys will be undertaken by competent and experienced ecologists following the relevant guidelines.	No immediate action required	Noted
Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.	Ecology	Sam Mardell	Noted	No immediate action required	Noted
District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A DLL scheme for GCN may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement.	Ecology	Sam Mardell	Noted. Approach to GCN mitigation including requirement for licencing to be determined following completion of update surveys in spring 2022.	No immediate action required	Noted
Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available here.	Ecology	Sam Mardell	Noted. Any OMH will be identified during botanic/habitat surveys undertaken in summer 2022.	No immediate action required	Noted
An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.	Ecology	Sam Mardell	Noted. Ornithological, botanical, and invertebrate surveys already scoped in as part of 2022 baseline surveys.	No immediate action required	Noted
The ES should assess the impacts of the proposal on any ancient woodland, ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.	Ecology	Sam Mardell	Noted. Arboricultural survey to be undertaken in 2022.	No immediate action required	Noted
Paragraph 174 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.	Ecology	Sam Mardell	Noted. This is the approach we are taking and that was presented in the scoping report	No immediate action required	Noted
The ES should use an appropriate biodiversity metric such as Biodiversity Metric 3.0 together with ecological advice to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain. The metric should be used to: • assess or audit the biodiversity unit value of land within the application area • calculate the losses and gains in biodiversity unit value resulting from proposed development • demonstrate that the required percentage biodiversity net gain will be achieved	Ecology	Sam Mardell	Noted.	BNG assessment will use Metric 3.0.	Agreed and adopted
BNG outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies. Opportunities for wider environmental gains should also be considered.	Ecology	Sam Mardell	Noted and will be considered throughout BNG assessment and design stages	No immediate action required	Noted

C2C scoping response

Scoping opinion comment	WSP Discipline	WSP owner	WSP response	Action	Status
The ES should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.	Landscape	Chris Carolan	Noted	LVIA to include landscape character assessment	Agreed and adopted
A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the special qualities of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.	Landscape	Chris Carolan	Noted	ES to include LVIA	Agreed and adopted
The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.	Landscape	Chris Carolan	Noted	LVIA to include cumulative effect	Agreed and adopted
To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.	Landscape	Chris Carolan	Noted	LVIA to include details of landscape design development, specifically around mitigation of impacts	Agreed and adopted
The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.	Heritage	Janette Platt	We have checked the list referred to in the comment and confirm that no such land is affected by the C2C scheme	No further action required	Noted
The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 100. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.	Landscape	Chris Carolan	Noted	LVIA to include PRoW, common land etc. in receptors. This is also an issue for assessment of effects on homes, jobs and amenity, as well as on transit and access	Agreed and adopted

C2C scoping response

Scoping opinion comment	WSP Discipline	WSP owner	WSP response	Action	Status
Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.	Landscape	Chris Carolan	C2C is fundamentally about provision on new active transport.	No further action required	Agreed and adopted
Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.	Landscape	Chris Carolan	Noted	To be considered in landscape design	Agreed and adopted
Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 174 and 175 of the NPPF. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.	Soil, Geology and Land Contamination	Alex Mann	Noted	Agricultural land classification assessment is likely required	Agreed and adopted
As set out in paragraph 211 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.	Soil, Geology and Land Contamination	Alex Mann	Noted. This is not relevant to C2C	No further action required	Noted
The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES): • The degree to which soils would be disturbed or damaged as part of the development • The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted. • This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk. • Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g., one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e., 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g., agricultural reinstatement, habitat creation, landscaping, allotments and public open space). • The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan. • The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.	Soil, Geology and Land Contamination	Alex Mann	These are part of the scope, under agriculture	No further action required	Noted

C2C scoping response

Scoping opinion comment	WSP Discipline	WSP owner	WSP response	Action	Status
Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) [1].A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government s Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England s protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NOx and SO2 against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.	Air Quality	Carol Chan	Noted	No further action required	Noted
The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).	Air Quality	Carol Chan	Noted	Any available strategic solutions or SNAPs, for designated sites located within the air quality study area will be reviewed and take into account in the ES.	Agreed and adopted
The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels. Further information can be obtained from the Local Planning Authority.	Water	Steph Harberfield	This will be further investigated as part of the ES.		Noted
The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what s already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.	Climate resilience	Caroline Jones	Comments are noted.	Noted - Ecology team to be made aware of literature sources suggested by Natural England. Water team will include an allowance for climate change within the Flood Risk Assessment which will support the planning application.	Agreed and adopted

C2C scoping response

Scoping opinion comment	WSP Discipline	WSP owner	WSP response	Action	Status
Further information is available from the Committee on Climate Change s (CCC) Independent Assessment of UK Climate Risk, the National Adaptation Programme (NAP), the Climate Change Impacts Report Cards (biodiversity, infrastructure, water etc.) and the UKCP18 climate projections. The Natural England and RSPB Climate Change Adaptation Manual (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England s Nature Networks Evidence Handbook (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.	Climate resilience	Caroline Jones	Comments are noted.	Noted - Ecology team to be made aware of literature sources suggested by Natural England.	Noted
The ES should also identify how the development impacts the natural environment s ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment s contribution to achieving net zero by 2050. Natural England s Carbon Storage and Sequestration by Habitat report (2021) and the British Ecological Society s nature-based solutions report (2021) provide further information.	Carbon	Bethan Hill	See point 17 of the DfTs comments		
The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. The Proposed Scheme should contribute towards the delivery of the Nature Recovery Network and the Cambridge Nature Network. National Habitats Network mapping is available to view at www.magic.defra.gov.uk. Reference should also be made to guidance set out in the Greater Cambridge Biodiversity SPD and the objectives and targets of the Cambridgeshire Green Infrastructure Strategy.	Ecology	Sam Mardell	See point 16 of the DfTs comments		