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Our Ref: TWA/2/2/166
Your Ref: ESR15001

27 November 2020

Jane Osayimwen
Greater Cambridge Partnership
Shire Hall
Castle Hill
Cambridge
CB3 0AP

VIA EMAIL

Dear Jane,

TRANSPORT AND WORKS ACT (APPLICATIONS AND OBJECTIONS PROCEDURE) (ENGLAND AND WALES) RULES 2006

PROPOSED CAMBRIDGE SOUTH EAST TRANSPORT (PHASE 2) SCHEME

1. I refer to your letter of 15 October 2020 requesting a scoping opinion under rule 8 of the above Rules.

2. You enclosed with your letter an Environmental Scoping Report dated 13 October 2020 ('403394-MMD-ENV-00-RP-EN-0436_E CSET Phase 2 Environmental Scoping Report') which describes the proposed scope of and methodology for the Environmental Impact Assessment ("EIA") of this scheme. This will be reported in the Environmental Statement ("ES") to accompany an application for an Order under the Transport and Works Act 1992 to authorise the scheme. The intended scheme would involve the necessary works and land acquisition powers required to enable the Greater Cambridge Partnership ("the Applicant") to construct a public transport and non-motorised user route from Cambridge to Babraham and a travel hub at the Babraham end of this route.

3. We have considered your request for an opinion on the proposed scope of the EIA in accordance with rule 8 of the above Rules. In formulating the scoping opinion, we have consulted the following organisations and have considered their responses:

- Natural England
- The Environment Agency
- Historic England
- Cambridgeshire County Council
- Greater Cambridge Shared Planning ("GCSP", on behalf of Cambridge City Council and South Cambridgeshire District Council)
- Network Rail
- Highways England

4. Responses were received from all consultees. Copies of the consultation responses are included with this letter, the contents of which should be noted.

5. The response from GCSP also included the responses of their consultation with Cambridge International Airport, the Defence Infrastructure Organisation, Stapleford Parish Council, and Cambridge Past, Present and Future ("CPPF"). Additionally, CPPF forwarded their response to the Secretary of State.

6. The Secretary of State has considered the assessment of potentially significant effects of the scheme set out in section 6 to 18 of the Scoping Report. Subject to the comments in paragraphs 10 to 39 below, he agrees with the scope of the EIA outlined in the Scoping Report.

7. The responses include several detailed comments on and questions arising from the Scoping Report including suggestions as to the content of the ES, the criteria that should be used to assess the baseline and significance of impacts and the sensitivity of receptors, guidance that should be referred to, and the extent and methodology of ecological and other surveys that should be carried out. You should review these responses in carrying out the EIA and in preparing the ES for this scheme.

8. Please note that this scoping opinion is given without prejudice to our consideration of any Order application which may be made for the scheme. The giving of the opinion implies no view on the Department's part about the merits or otherwise of the scheme.

9. The Secretary of State considers that the following matters should also be addressed in the ES, some of which you may already be intending to address. References in brackets are to paragraphs in the Scoping Report.

General

10. The ES should provide full details of the scheme including more detail on the Travel Hub, as outlined in the consultation response from GCSP.

11. The ES should also provide details on how many vehicles and passengers are expected to use the high quality public transport, and the hours and days of operation initially and in the future.

Cumulative Impact Assessment (Chapter 4, section 6)

12. The ES should clarify how it proposes to consider the combined effects of individual environmental topics (4.6.1), particularly with regard to health, quality of life and amenity as set out in the consultation response from GCSP.

13. It is noted that the Scoping Report refers to the proposed Cambridge South station, but this is not included in the list of schemes in Table 4.3. The cumulative assessment should take account of Network Rail's planned Cambridge South Infrastructure Enhancements scheme of which Cambridge South Station is part.

14. Noting the lead applicant for this scheme will be Cambridgeshire County Council, agreement to the list of projects to be assessed cumulatively should be sought from the relevant local authorities.

Air quality (Chapter 6)

15. The air quality assessment should include an analysis of the impact of the additional heavy duty vehicles travelling into central Cambridge and into the Cambridge Air Quality Management Area. It should also include consideration of infrastructure requirements for charging electric buses if relevant, including potential grid capacity constraints.

16. The Applicant should provide justification for 2015 being used as a base year for the air quality assessment, as suggested in section 17.4.1.

Biodiversity (Chapter 7)

17. Under table 7.1, the relevant survey guidance for designated sites for bats should refer to Design Manual for Roads and Bridges LA 115 rather than the 2009 guidance.

Community and Human Health (Chapter 9)

18. In relation to section 9.4.2.2, consideration should be given to access to open space and recreation, and access to healthcare facilities.

19. Consideration should be given to operational noise and potential health impacts.

Historic Environment (Chapter 10)

20. The assessment should use a historic environment study area of radius 1.5km from the scheme as the baseline for the EIA, as set out in Historic England's comments.

21. The ES should include a photomontage taken from the Church of St Andrew in Stapleford, to better allow the assessment of visual impacts on its setting and the Stapleford Conservation Area.

22. Any intrusive archaeological investigation carried out as part of the archaeological assessment (10.4.1) should follow the Chartered Institute for Archaeologists' 'Standard and guidance for archaeological field evaluation' (December 2014).

23. The Conservation Officer and archaeological staff at the relevant District and County Councils should continue to be consulted in the development of this assessment.

Landscape and Visual (Chapter 11)

24. The Applicant should provide an Environmental Lighting Impact Assessment (ELIA) as part of the Environmental Statement, covering the likely lighting effects that would result from the construction and operation of the scheme, as detailed in the consultation response from GCSP.

25. If the visibility of lighting apparatus has not been included in the zone of theoretical visibility (ZTV), the landscape and visual impact assessment should consider the effect of lighting on receptors outside the 2km study boundary.

26. The Applicant should clarify for what stage in the development the ZTV has been chosen. The Applicant should further consider developing separate zones for the date of opening and year 15 of operation, in order to show the impacts of mitigation and changes to the ZTV in the long term.

27. The potential for adverse effects on users of public spaces should be considered alongside the other visual effects discussed in section 11.6.1.

Noise and Vibration (Chapter 12)

28. The baseline noise survey (12.5) should be compliant with BS7445 or similar.

29. The EIA should consider relative increases above the existing baseline noise level ('BNL'), in addition to the proposed use of LOAELs and SOAELs. Relative increases above BNL should be assessed separately in the short and long term, and changes above or below BNL should be reported.

30. If the noise levels in 12.4.3.1 are used in the EIA, full justification for their source and selection should be provided.

31. Noting that BS5228:2009+A1:2014 has maximum levels for vibration but not for airborne noise, the EIA should consider the potential for and the impact of maximum levels of airborne noise (LAmax) if night-time works are envisaged.

32. The EIA should consider noise impacts on external amenity areas (such as public open spaces and private gardens) as per BS8233:2014 in addition to the proposed consideration of impacts at or near building facades.

Soils, Geology and Land Contamination (Chapter 14)

33. The ES should contain a detailed assessment for each historic landfill site on or near the proposed route, including: assessment of associated potential pollution risks based on investigations, precautions around landfill gas and leachate, and investigation and engineering to protect the scheme from these risks.

34. The EIA should provide a piling risk assessment, including baseline monitoring, to confirm that any piling will not cause adverse effects, including turbidity.

35. The Applicant should provide evidence to support the decision to scope out geological impacts on a regional level.

Water Resources and Flood Risk (Chapter 15)

36. The EIA should provide a Phase I Contaminated Land Assessment, including a desk study, conceptual model and initial assessment of risk. This should ensure that the risks to controlled waters are understood and can be addressed should potential pollutant linkages be identified.

37. The potential for contamination and any risks arising should be properly assessed and assurance provided that the necessary expertise has informed this assessment.

38. Given that the route passes near or over the River Granta, Nine Wells and Hobson's Brook, is located in groundwater protection zones SPZ2 and SPZ3, and is underlain by the Cam and Ely Ouse Chalk groundwater body, impacts on groundwater and surface water should not be scoped out.

39. The Applicant should clarify what 'significant' below-ground works means in section 15.6.1, and whether dewatering would be required. If dewatering is required, the EIA should assess the impacts of this.

Distribution

40. Copies of this letter are being sent to those organisations which were consulted on the request for a scoping opinion, as listed at the beginning of this letter.

Yours sincerely,

Natasha Kopala

Date: 30 October 2020
Our ref: 331107
Your ref: Cambridge South East Transport Phase 2

Mr Fergus O'Dowd
Transport Infrastructure Planning Unit
transportinfrastructure@dft.gov.uk

BY EMAIL ONLY

NATURAL ENGLAND

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Dear Mr O'Dowd

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town & Country Planning EIA Regulations 2017): Proposed Transport And Works Act Order For Cambridge South East Transport Phase 2

Thank you for your consultation dated and received by Natural England on 16th October 2020.

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

The scoping request is for a proposal that does not appear, from the information provided, to affect any nationally designated geological or ecological sites (Ramsar, SPA, SAC, SSSI, NNR) or landscapes (National Parks, AONBs, Heritage Coasts, National Trails), or have significant impacts on the protection of soils (particularly of sites over 20ha of best or most versatile land), nor is the development for a mineral or waste site of over 5ha.

Natural England is generally supportive of the proposed approach to assessing the impacts of the proposed scheme on the natural environment, including designated sites and wider biodiversity, landscape, soils and climate change, as set out in the Environmental Scoping Report (Mott MacDonald, 13 October 2020). Bat survey and assessment should have regard to advice provided by Natural England in our letter dated 13 July 2020 (ref. DAS/14298/320123), particularly with regard to potential impacts on Eversden and Wimpole Woods SAC barbastelle bats / functional habitat.

We welcome that a Habitats Regulations Assessment (HRA) report will be produced, in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended), in parallel to the EIA process. We support proposals for appropriate environmental mitigation and landscaping along the route with an aspiration to deliver 20% Biodiversity Net Gain (BNG) which will make a useful contribution towards Cambridgeshire's Doubling Nature target. Our advice is that consideration should be given to buffering, enhancing and connecting existing sites such as Nine Wells Nature Reserve and delivering benefits for priority chalk grassland and woodland habitats and farmland birds.

At present therefore it is not a priority for Natural England to advise on the detail of this EIA. We would, however, like to draw your attention to some key points of advice, presented in annex to this letter, and we would expect the final Environmental Statement (ES) to include all necessary information as outlined in Part 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017. If you believe that the development does affect one of the features listed in paragraph 3 above, please contact Natural England at consultations@naturalengland.org.uk, and we may be able to provide further information.

Yours sincerely

Dominic Rogers
Consultations Team

Annex A – Advice related to EIA Scoping Requirements

1. **General Principles**

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

1. A description of the development, including in particular:
(a) a description of the location of the development;
(b) a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases;
(c) a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;
(d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.

2. A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.

4. A description of the factors specified in regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.

5. A description of the likely significant effects of the development on the environment resulting from, inter alia:
(a) the construction and existence of the development, including, where relevant, demolition works;
(b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;
(c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;
(d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);
(e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;
(f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;
(g) the technologies and the substances used. The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project, including in particular those established under Council Directive 92/43/EEC (a) and Directive 2009/147/EC(b).

6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.

8. A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

2. **Biodiversity and Geology**

2.1. Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EcIA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EcIA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework (NPPF) sets out guidance in paragraphs 170-171 and 174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2. Internationally and Nationally Designated Sites

Natural England undertakes an initial assessment of all development consultations, by determining whether the location to which they relate falls within geographical 'buffer' areas within which development is likely to affect designated sites. The proposal is located outside these buffer areas and therefore appears unlikely to affect an Internationally or Nationally designated site. However, it should be recognised that the specific nature of a proposal may have the potential to lead to significant impacts arising at a greater distance than is encompassed by Natural England's buffers for designated sites. The ES should therefore thoroughly assess the potential for the proposal to affect designated sites, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites and Sites of Special Scientific Interest (SSSI). Should the proposal result in an emission to air or discharge to the ground or surface water catchment of a designated site then the potential effects and impact of this would need to be considered in the Environmental Statement

Local Planning Authorities, as competent authorities under the provisions of the Conservation of Habitats and Species Regulations 2017 (as amended), should have regard to the Habitats Regulations Assessment process set out in Regulation 63 of the Habitats Regulations in their determination of a planning application. Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

Statutory site locations can be found at www.magic.gov.uk. Further information concerning particular statutory sites can be found on the Natural England website.

2.3. Protected Species

The ES should assess the impact of all phases of the proposal on protected species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; 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, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal 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.

Natural England has adopted standing advice for protected species. It provides a consistent level of basic advice which can be applied to any planning application that could affect protected species. It also includes links to guidance on survey and mitigation.

Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species.

2.4. Regionally and Locally Important Sites

The ES should thoroughly assess the impact of the proposals on non-statutory sites, for example Local Wildlife Sites (LoWS), Local Nature Reserves (LNR) and Regionally Important Geological and Geomorphological Sites (RIGS). Natural England does not hold comprehensive information on these sites. We therefore advise that the appropriate local biological record centres, nature conservation organisations, Local Planning Authority and local RIGS group should be contacted with respect to this matter.

2.5. Biodiversity Action Plan Habitats and Species

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed in the UK Biodiversity Action Plan (BAP). These Priority Habitats and Species are listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, recently published under the requirements of S14 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available in the Defra publication 'Guidance for Local Authorities on Implementing the Biodiversity Duty'.

Government Circular 06/2005 states that BAP species and habitats, 'are capable of being a material consideration…in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of BAP habitat for the area under consideration.

3. **Landscape, Access and Recreation**

3.1. Landscape and Visual Impacts

The consideration of landscape impacts should reflect the approach set out in the *Guidelines for Landscape and Visual Impact Assessment* (Landscape Institute and the Institute of Environmental Assessment and Management, 2013, 3rd edition), the *Landscape Character Assessment Guidance for England and Scotland* (Scottish Natural Heritage and The Countryside Agency, 2002) and good practice. The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England would expect the cumulative impact assessment to include those proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant National Character Areas which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

3.2. Access and Recreation

The ES should include a thorough assessment of the development's effects upon public rights of way and access to the countryside and its enjoyment through recreation. With this in mind and in addition to consideration of public rights of way, the landscape and visual effects on Open Access land, whether direct or indirect, should be included in the ES.

Natural England would also expect to see consideration of opportunities for improved or new public access provision on the site, to include linking existing public rights of way and/or providing new circular routes and interpretation. We also recommend reference to relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

4. **Land use and soils**

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 170 and 171 of the NPPF. We also recommend that soils should be considered under a more general heading of sustainable use of land and the valuing of the ecosystem services they provide as a natural resource, also in line with paragraph 170 of the NPPF.

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. The Natural Environment White Paper (NEWP) *'The Natural Choice: securing the value of nature'* (Defra, June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils and the protection of BMV agricultural land.

Development of buildings and infrastructure prevents alternative uses for those soils that are permanently covered, and also often results in degradation of soils around the development as result of construction activities. This affects their functionality as wildlife habitat, and reduces their ability to support landscape works and green infrastructure. Sealing and compaction can also contribute to increased surface run-off, ponding of water and localised erosion, flooding and pollution.
Defra published a Construction Code of Practice for the sustainable use of soils on construction sites (2009). The purpose of the Code of Practice is to provide a practical guide to assist anyone involved in the construction industry to protect the soil resources with which they work.

As identified in the NPPF new sites or extensions to new sites for Peat extraction should not be granted permission by Local Planning Authorities or proposed in development plans.

General advice on the agricultural aspects of site working and reclamation can be found in the Defra Guidance for successful reclamation of mineral and waste sites.

5. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. 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). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

6. Climate Change Adaptation

The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment "by establishing coherent ecological networks that are more resilient to current and future pressures" (NPPF Paras 170 and 174), which should be demonstrated through the ES.

Fergus O'Dowd
Department for Transport
Transport Infrastructure Planning Unit
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33 Horseferry Road
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SW1P 4DR

Our ref: AC/2020/129753/01-L01
Your ref: CSET Phase 2

Date: 18 November 2020

Dear Mr O'Dowd

PROPOSED TRANSPORT AND WORKS ACT ORDER FOR CAMBRIDGE SOUTH EAST TRANSPORT PHASE 2 GREATER CAMBRIDGE PARTNERSHIP

Thank you for your consultation.

We have reviewed the Environmental Scoping Report: Cambridge South East Transport (CSET) Phase 2, 13 October 2020; our comments are set out below.

FLOOD RISK MANAGEMENT
We have no in principle concerns with the scope as it has identified the key fluvial issues surrounding the floodplain crossings of the River Granta. However, there is little to no discussion on how the scheme can have a positive impact on the area through flood mitigation.

The TWAO limits the ability to add in land for actively reducing flood risk but we would like to see whether there are any direct opportunities within the TWAO red line boundary (potentially by integrating flood risk management with other mitigation measures i.e. using compensatory habitats as a form of Natural Flood Risk Management).

We would also like to work in partnership with the scheme to investigate the feasibility of a Flood Risk Management scheme utilising the river crossings to reduce the risk of flooding downstream. This would be outside of the scope of the TWAO.

Climate Change Allowances
The Climate Change allowances for rainfall intensity and river flows are likely to be updated in the near future.

Surface water drainage
We recommend that the SuDS for the routes considers more than just the rate and volume of surface water runoff. We would like to see demonstration that the rate of onset is not increased, making the River Granta more reactive to rainfall than it currently is.

Cont/d..

Transport Hub
The report refers to the surface water drainage network will be located within flood zones 2 and 3. We assume this doesn't include the attenuation features as those should be avoided within the floodplain.

GROUNDWATER AND CONTAMINATED LAND
The proposed route is underlain by the Cam and Ely Ouse Chalk groundwater body which consists of principal and secondary aquifers; protected waterbodies under the EU Water Framework Directive (WFD) of high vulnerability to soil contaminant leaching and is bisected by Granta River.

The proposed route is, also, located within groundwater protection zones, specifically SPZ2 and SPZ3. Source Protection Zones are used to define areas close to drinking water sources where the risk associated with groundwater contamination is greatest and relate to distances and zones defined in legislation where certain activities are restricted. These abstractions must be protected from potential contamination by pollutants entering the aquifer and reaching the water supply.

Please note that certain water supplies do not require a licence and therefore may not be known to the Environment Agency. The locations of private domestic sources may be held by the Local District Council on the register required by the Private Water Supplies Regulations 1991.

Regarding the historic landfill sites that the scheme traverses close to or on to, we would wish to see a detailed assessment carried out for each landfill site along the proposed route which will include assessment of associated potential pollution risks based on investigation findings. Precautions should be taken with respect to landfill gas (explosive and asphyxiant risks) and leachate (pollution risk) as these landfill sites are not likely to have been engineered to modern standards. Investigation and appropriate engineering methods should be used to protect the highway and any associated services from the above.

We understand that a desk study has been carried out for the proposed scheme. Whilst it is noted that screening of potentially contaminated land sites has been undertaken, vulnerability from previous potentially contaminative waste activities along the route have not been considered. We would, therefore, recommend that sufficient information be provided in the form of a Phase I Contaminated Land Assessment (including a desk study, conceptual model and initial assessment of risk), to provide assurance the risks to controlled waters are fully understood and can be addressed through appropriate measures. Where potential pollutant linkages are identified, further investigation, assessment and/or remediation works may be required.

Imported soils must not contain substance at concentrations in excess of those identified at the receiving site i.e. no increase in the level of risk once imported to the receiving site. Screening criteria should be set in the development's Material Management Plan.

Piling or other ground improvement methods could have an adverse impact on the groundwater quality within the aquifers underlying the route or provide preferential pathways for contaminant migration to those aquifers during construction and after the completion of the development. We expect a Piling Risk Assessment to be prepared, which will include baseline monitoring to demonstrate no adverse effects (including turbidity).

Furthermore, surface water drainage systems need to be appropriate to the location they are to be installed in. We would expect infiltration tests to be carried out for proposed soakaways, should these be considered for certain areas in the design, to prove they will function successfully.

The Environment Agency supports the use of SuDS where they do not present a risk to controlled waters. Infiltration SuDS need to meet the criteria in Groundwater Protection Position Statements G1 and G9 to G13.

It should be noted that SuDS may not be applicable in areas where the groundwater level is close to the ground surface. The groundwater level should be assessed in determining the most suitable surface water drainage system for each development. We would also recommend that the geological and hydrogeological setting is explored for the proposed route to assess sensitivity and vulnerability of the site to potential contamination and pollution.

Deep infiltration SuDS are generally not acceptable in areas where groundwater constitutes a significant resource. All infiltration SuDS require a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels. In addition, they must not be constructed in contaminated ground, where they could promote the mobilisation of contaminants and give rise to contamination of groundwater or surface waters.

Advice to applicant
The planning authority should satisfy itself that the potential for contamination and any risks arising are properly assessed and that the development incorporates any necessary remediation and subsequent management measures to deal with unacceptable risks, including those covered by Part IIA of the EPA 1990. Developers should be able to assure local planning authorities they have the expertise, or access to it, to make such assessments.

Water Resources
The Scoping Report states that *"surface water and groundwater resources are not present as significant features and will therefore not be assessed in the ES."* and "*as the potential impacts on groundwater and surface water from the CSET Scheme design are considered highly unlikely to be significant the EIA will not include a detailed evaluation of these impacts*." Groundwater is a significant resource in this locality and sensitivity of potential receptors (such as Nine Wells Springs and groundwater-fed surface waters including Hobson's Brook and the River Granta) is high. However, potential impacts on groundwater may not be significant, depending on the construction activities proposed.

Section 15.6.1 states that *"During construction there are not likely to be significant below ground works*." Significant needs to be defined in this context. Will any de-watering be required? It should be noted that the chalk groundwater is very shallow in the area, hence any below groundwork is likely to go beneath the chalk groundwater table. If it is thought that de-watering will be required then given the sensitivity of receptors an assessment of the impacts of de-watering will need to be undertaken in the EIA.

Please be aware that any small scale dewatering in the course of building or engineering works which is greater than 20 cubic metres per day and does not meet the conditions of the groundwater abstraction exemption under Regulation 5 of the Water Abstraction and Impounding (Exemptions) Regulations 2017 will require an abstraction licence from the Environment Agency. Where an abstraction licence is required, a detailed assessment will be have to be made to support the application.

The Environment Agency assesses applications to abstract water against local water availability. In groundwater bodies where water is already fully committed, there is a presumption against issuing new consumptive groundwater licences. In the case of dewatering we consider a licence to be consumptive where the water cannot be returned locally to the aquifer.

As mentioned earlier, the scheme overlies the Cam and Ely Ouse Chalk groundwater body. This groundwater body has poor quantitative status and as such, there is a presumption against issuing new consumptive groundwater licences in this area.

Please note that applying for a licence does not guarantee that a licence will be issued.

If you consider that dewatering may be necessary, please submit a pre-application to receive up to 15 hours of free advice. For more information visit:
https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence#types-of-licence

For more information on dewatering exemptions visit:
http://www.legislation.gov.uk/uksi/2017/1044/regulation/5/made

For more information on resource availability visit:
https://www.gov.uk/government/collections/water-abstraction-licensing-strategies-cams-process

We hope that this information is of assistance to you. If you have any further queries please do not hesitate to contact us.

Yours sincerely

Elizabeth Mugova
Sustainable Places Planning Advisor
East Anglia Area

Direct e-mail planning.brampton@environment-agency.gov.uk .

Historic England

Mr Fergus O'Dowd
Transport Infrastructure Planning Unit
Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

Direct Dial: 01223 582746

Our ref: PL00721262

6 November 2020

Dear Mr O'Dowd

Thank you for your email of Friday 16th October consulting us about the above EIA Scoping Report.

This development could, potentially, have an impact upon designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place.

With the above in mind, we are pleased to note that the Scoping Report contains a comprehensive baseline chapter related to the historic environment. We consider that, overall, the assessment methodology it proposes is acceptable. We are pleased to note that the assessment contains consideration of assets discussed at meetings with the Landscape, Heritage and Ecology Working Group for the project, convened by the Greater Cambridge Partnership. We have the following minor comments to make:

Study Area: we note that the EIA proposes to use a 1km radius relating to the historic environment, although we also note that 2km is used to establish zones of visual influence in the landscape impact chapter. We consider that, owing to the linear scale of the proposals, and its potential visibility, 1km may be too constrained an area for an initial baseline survey. We would recommend 1.5km being the standard baseline, particularly for assets of higher significance (Grade II* and I listed buildings, Scheduled Monuments, and Registered Parks and Gardens

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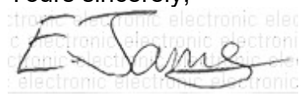
of II* and above), even if this simply permits assets to be screened out of detailed assessment more effectively. At present, the 1km automatically discounts a number of heritage assets we consider should be formally discounted. In particular, we note that this would incorporate the Church of St John the Baptist at Pampisford (Grade I), which we consider should be included. We note, however, the Scoping Report's proposed approach of including assets of particularly high value outside study area, which we consider is appropriate approach, taking into account the NPPF's advice on proportionality.

We would recommend including a photomontage taken from the Church of St Andrew (Grade II*) in Stapleford (including if possible from the tower), to inform the assessment of potential visual impact upon its setting, as we note that this is not included. This would also capture the potential impact upon the setting of the of the Stapleford Conservation Area.

We would strongly recommend that you involve the Conservation Officer of South Cambridgeshire District Council (Greater Cambridge Shared Planning) and continue to engage with the archaeological staff at Cambridgeshire County Council in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,



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Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

PROPOSED TRANSPORT AND WORKS ACT ORDER FOR CAMBRIDGE SOUTH EAST TRANSPORT PHASE 2

Environmental Scoping Report: Response by Cambridgeshire County Council

Prepared by: Colum Fitzsimons

Date: 12th November 2020

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1. County Planning Minerals and Waste

1.1 Thank you for consulting Cambridgeshire County Council, as the Minerals and Waste Planning Authority (MWPA), on the above proposal. We have reviewed the EIA scoping opinion and note that the topic of waste has been scoped out. From the available information we agree with this conclusion.

2. Historic Environment Chapter

2.1 The following comments are made with regard to the Historic Environment chapter of this Environmental Scoping Report wherein an overview of the character of the known archaeological resource has been provided (Chapter 10).

2.2 Archaeology is the discovery, study and understanding of evidence of past human populations. The Historic Environment Team of Cambridgeshire County Council works in partnership with others to protect and enhance Cambridgeshire's historic environment, by providing advice and information on the archaeology and historic environment for the management of changes brought about through development, to promote sustainable growth, to provide outreach and learning opportunities for schools and communities, access and awareness, active citizenship, lifelong learning and a sense of place for communities in Cambridgeshire and to maintain an archaeological archive accrued through fieldwork.

2.3 The proposed scheme is for a High Quality Public Transport (HQPT) service that will operate between the A11 / A1307 junction (near Babraham) and Cambridge. It will traverse archaeologically rich sections of the undulating chalk plain on the south east side of Cambridge comprising sites designated as Scheduled Monuments, Listed Buildings and a wealth of non-designated archaeological heritage assets that are mapped on the Cambridgeshire Historic Environment Record that we maintain.

2.4 The scoping report outlines the sites designated as Grade I and II Listed Buildings, Designated Landscapes and as Scheduled Monuments in section 10.5. Geographically important for the latter is the proximity of Hobson's Brook and the natural springs at Nine Wells at the north-west end of the scheme and the valley of the River Granta where it is in proximity to the scheme. This is because of the preference of past communities to locate close to water sources and for communications purposes. In such areas we can anticipate the presence of archaeological evidence and target these with evaluation strategies that determine to look beneath masking any alluvial silt layers that may protect and preserve organic archaeological and palaeoenvironmental components. Other geomorphological forms of relevance are the chalk hill crests of the Gog Magog Hills on the north east side of the scheme on which prehistoric defensive sites and ceremonial sites were located. Scheduled monuments such as the Iron Age hillfort at Wandlebury are here (National Heritage List Entry 1009395), the Causewayed enclosure and bowl barrow at Little Trees Hill (NHLE 1011717), Long barrow and enclosure 870m ENE of Copley Hill Farm (NHLE 1020845) and the Bowl barrow on Copley Hill (NHLE 1017327). The line of a principal Roman Road, Worstead Street (Via Devana) near Cambridge (NHLE 1003263) lies further to the northeast. Views down to the Granta valley and the line of the route from these hill top locations will be glimpsed in places. On low ground between Hobson's Brook and to the west of the railway at the north west end of the scheme, the Sites revealed by aerial photography W of White Hill Farm (NHLE 1006891) form an extensive multi-period complex of sites pre-dating and relating to a Roman villa farm. Evidence from this site extends across the scheme area, as found through geophysical survey, along with other areas of archaeological occupation and possible funerary evidence - particularly at the south east end close to

the barrow cemeteries (e.g. HER ref MCB11167, MCB14497) to the east of the Roman Road to Braughing (MCB26667) - the current line of the A11.

2.5 The Historic Environment team has worked with the authors and promoters of this scheme, the Greater Cambridge Partnership, over the last two years to design a suitable strategy for the location and the evaluation of the preferred route and to provide advice as a partner in the Landscape, Heritage and Ecology Working Group.

2.6 We can confirm that the approach outlined for the acquisition and interpretation of historic environment evidence responds to the polices for the Historic Environment contained in Chapter 16 of the National Planning Policy Framework (MHCLG 2019) and meets our recommended standard, an evidence base soon to be enhanced by the results of a field evaluation of the line of the transport route that is due to commence. These results will verify those acquired through non-intrusive survey techniques (air photograph transcription of crop marked evidence, geophysical study and desk-based assessment) and indicate the significance of the archaeological sites examined in the evaluation trenches. This is important fieldwork, as should archaeological remains be found that are considered to be of national importance and equal to those that are designated as scheduled monuments then policies contained in the National Planning Policy Framework regarding the protection of important heritage assets (NPPF 193-196) would be followed and may require consequent modifications to the scheme design. Footnote 63 of NPPF applies: "Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets."

2.7 The County Council has no objection to the scoping report presented for this proposed scheme.

3. Local Lead Flood Authority

3.1 The Environmental Impact Assessment Scoping Report submitted includes information of the water environment proposals. The principles of surface water drainage outlined within the scoping report are acceptable, however as LLFA we expect a full flood risk

assessment and/or surface water drainage strategy to be submitted to support any application which must include:

(i) How the proposed surface water drainage scheme has been determined following the drainage hierarchy;

(ii) Pre development run-off rates;

(iii) Post development run-off rates with associated storm water calculations;

(iv) Discharge location(s);

(v) Drainage calculations to support the design of the system;

(vi) Drawings of the proposed surface water drainage scheme including sub-catchment breakdowns where applicable;

(vii) Maintenance and management plan of the surface water drainage system (for the lifetime of the development) including details of future adoption.

(viii) The applicant should, as part of the surface water strategy, demonstrate that the requirements of any local surface water drainage planning policies have been met and the recommendations of the relevant Strategic Flood Risk Assessment and Surface Water Management Plan have been considered.

3.2 It should be noted that the proposed works will cross areas of Flood Zone 2 and 3 around the River Granta. Therefore, the proposals must include flood zone compensation for the area of the flood zone the route takes up. This is relevant for all scales of flood zone utilised within a development.

3.3 The proposed route for the transport link and the travel hub are within source protection zones. In these areas water resources, through aquifer recharge, and water quality are important considerations. The underlying ground conditions may be conducive to infiltration techniques and any water being discharged to the ground must meet water quality criteria.

Informatives

Infiltration

3.4 Infiltration rates should be worked out in accordance with BRE 365. If it is not feasible to access the site to carry out soakage tests before planning approval is granted, a desktop study may be undertaken looking at the underlying geology of the area and assuming a worst-case infiltration rate for that site. If infiltration methods are likely to be ineffective then discharge into a watercourse/surface water sewer may be appropriate; however soakage testing will be required at a later stage to clarify this.

OW Consent

3.5 Constructions or alterations within an ordinary watercourse (temporary or permanent) require consent from the Lead Local Flood Authority under the Land Drainage Act 1991. Ordinary watercourses include every river, drain, stream, ditch, dyke, sewer (other than public sewer) and passage through which water flows that do not form part of Main Rivers (Main Rivers are regulated by the Environment Agency). The applicant should refer to Cambridgeshire County Council's Culvert Policy for further guidance:

https://www.cambridgeshire.gov.uk/business/planning-and-development/flood-and-water/watercourse-management

3.6 Please note the council does not regulate ordinary watercourses in Internal Drainage Board areas.

Pollution Control

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

4. Highway Asset Management Team

Introduction

4.1 Cambridgeshire County Council's Highways Asset Information Team maintains the County Council's legal records of the highway network, including Public Rights of Way (PROW), and is responsible for managing legal processes to alter the extent or status of the network, and for drafting and reviewing the Rights of Way Improvement Plan (ROWIP). It is within the remit of the Team to comment upon the proposed legal changes to the extent and status of the highway network that would result from the implementation of Phase 2 of the Cambridge South East Transport (CSET) programme.

4.2 This document contains comments on the Preferred Route Option that was announced in October 2020. It is not intended that this document represents the full and complete opinion of the Highways Service on all of the released documents. The Highways Service reserves the right to make further additional comments on the documents (or any other proposal related to this scheme) at a later date, should the Service consider it necessary to do so.

4.3 The comments below are divided into two sections: (i) general commentary to advise the scheme on a holistic basis, and (ii) site-specific comments that address particular passages or locations within the consultation documents.

General comments

4.4 The Asset Information Team welcomes improvements to public transport options for Cambridgeshire communities. By reducing vehicular traffic into Cambridge city centre, the proposal ties into the aim of the Place & Economy directorate to manage and deliver the growth of sustainable communities while meeting the challenges of climate change, as well as encouraging a healthy life style.

4.5 The Asset Information Searches Team is responsible for managing legal records of the road network and ensuring any changes to the network are reflected in those legal records. Therefore we request early consultations with the Searches team to ensure (i) that proposed improvements fall within the highway in locations where the transit

route crosses the existing highway network, (ii) that any queries about the physical extent of the highway can be addressed by the Team prior to implementation, (iii) that any new areas of highway can be identified as early as possible to enable the adoption process to proceed efficiently, and (iv) that any new highway infrastructure assets (such as street lighting columns, traffic signals, signs, etc.) can be identified and planned in accordance with the Highways Service's specifications.

4.6 It is important to note that the highway extent data shown on the County Council's MapInfo system is indicative only. The highway extent data is a digital representation of the legal highway records, which has been plotted against current Ordnance Survey mapping as accurately as possible. The information should not be relied on in disputes or for legal purposes. Therefore if this information has been used in developing scheme proposals, it would be wise to consult the Searches Team about the accuracy of the data prior to making final decisions in relation to works within the existing highway network.

4.7 It is accepted that land will need to be acquired in order to construct the scheme. The Searches Team is also responsible for maintaining a record of land purchased for highway purposes, and would advise that careful consideration is given to the land that is acquired for the scheme, in order to ensure that the County Council is not encumbered by surplus land assets of little practical value. Wherever possible, efforts should be made to return land not required for construction to its pre-existing owner.

4.8 Any surplus areas of land which serve no highway purpose or do not serve the construction needs of the scheme should not be proposed as being part of the public highway within the final legal Order for the works. Designating areas of land that do not serve a highway function (i.e. for passing-and-repassing, or for direct maintenance of the network) as being part of the highway creates unnecessary liability for the Highways Service. Furthermore, there should be no assumption that the County Council will adopt land simply because it is adjacent to the highway, even if utilities apparatus is installed within it. Any utilities corridors that run across open land will not be considered part of the highway network.

4.9 Accordingly, the County Council would only look to adopt land that is required for highway purposes and the Searches and Asset Management Teams should be consulted on this prior to the making of an Order for these works.

4.10 It is important that early work is undertaken to avoid legacy issues. If not appropriately addressed, there is the potential for issues to remain unresolved in such areas as: inconsistencies in respect of highway extents, responsibilities for public rights of way and asset maintenance responsibilities. Early engagement with the Highways Service is therefore encouraged in order to reduce the likelihood of such issues arising in the future in relation to these proposals.

4.11 It is recommended that early liaison is undertaken with the Asset Planning team to ensure that advanced consideration can be given to the formulation of an asset management plan for the new transport facility.

Specific Comments – Environmental Scoping Report

<u>Paragraph 2.5.4 – Non-Motorised User Path</u>

4.12 We welcome the proposal for a Non-Motorised User Path (shared use path, 'NMU') for walkers, cyclists and horse riders and would make the following comments:

(i) Request that the route is dedicated as a public bridleway, enabling the legal status of the route to be clearly defined and secured for the future.

(ii) The width of the route should be a minimum of 4 metres. This meets the desired standard for a bridleway and allows the various different user types to pass each other safely.

(iii) The surfacing of the route should give consideration to all users.

<u>Paragraph 2.3.7 - Section 7: High Street, Babraham, to A11 Travel Hub</u>

4.13 It is stated that an improved walking and cycling route will be included as part of the travel hub. This is welcomed, however consideration must also be given to the current quality and status of the existing off-road routes that connect to and from the proposed travel hub.

4.14 Routes connecting to the travel hub from the east (over the A11).

(i) Footbridge. The footbridge across the A11 carries Public Footpaths 12/4 and 4/3. The width of the path over the bridge deck is too narrow for cycles to be used and may bring conflict with pedestrians. While ramps to reach the height of the bridge deck are welcomed, it is advised that cyclists are asked to dismount when crossing the bridge.

(ii) Surface of FP 4/3 on the east side of the A11 footbridge. It is to be expected that use of this footpath (with permissive rights for cycling) will increase. The existing surfacing of Public Footpath 4/3 is likely to require improvement, so that it is usable in all weathers. This route has no legally defined width, so before any improvements can take place, a Definitive Map Modification Order (DMMO) will need to be requested so that the width can be investigated and legally recorded. The DMMO process can take over a year and is open to objections, so the process should be applied for well in advance of any planned works. This process is managed by the Asset Information Definitive Map team. Alternatively, agreements with the affected landowners will need to be sought to dedicate a sufficient width to allow the required works to proceed. Please liaise with the Definitive Map team about how this might be achieved.

(iii) Route Status/Equestrian use. If the suggested bridleway is provided to allow equestrians to link to the travel hub via a new route beneath the A11, this route will meet Public Footpath 4/3 at the eastern side of the A11. This existing footpath between Newmarket Road and the A11 will therefore need to be upgraded to a bridleway in order to allow equestrian traffic. Upgrading to bridleway status would enshrine the right of equestrian users, however a permissive bridleway agreement could potentially be reached as an alternative. It should be noted that the process of upgrading to a bridleway is a public process that is open to objections and can take over a year to complete.

(iv) Linkages to Granta Park alongside Newmarket Road. We welcome the opportunity for provision of an active travel link to Granta Park. A shared use pedestrian and cycle track should be created to provide safe off-carriageway passage between the Travel Hub and Granta Park.

4.15 Routes connecting to the travel hub from the west (Babraham and the Technology Park).

(i) With the expected increase in usage of the Public Footpath 12/4 (which has permissive rights for cycling), which leads westward to Babraham, the existing surfacing is likely to require improvement, so that it is usable in all weathers. This route has no legally defined width, and as such before any improvements can take place a Definitive Map Modification Order (DMMO) will need to be requested so that the width can be investigated and legally recorded. The DMMO process can take over a year and is open to objections, so the process should be applied for well in advance of any planned works. This process is managed by the Asset Information Definitive Map team. Alternatively, agreements with the affected landowners will need to be sought to dedicate a sufficient width to allow the required works to proceed. Please liaise with the Definitive Map team about how this might be achieved.

(ii) Route Status/Equestrian use. To enable equestrian users to reach the travel hub and the NMU facility alongside the new transit route from Babraham, we would request that Public Footpath 12/4 is considered for upgrade to bridleway status. This would enshrine equestrian rights along the route and provide a circular bridleway route in combination with the NMU alongside the transit route. It should be noted that the process of upgrading to a bridleway is a public process that is open to objections and can take over a year to complete.

(iii) Roadside provision – High Street, Babraham. Consideration should be given to the enhancement of roadside cycle tracks and footways leading out of Babraham, between the termination of bridleway 12/12 and the proposed new NMU facility where it crosses High Street (to the south-west). Enhancement of these facilities to permit equestrian use would create a circular bridleway route.

<u>Paragraph 9.6.1 – Construction</u>

4.16 It is accepted that public rights of way will be impacted by construction works, and that diversions may be required. Any diversion should be limited in both duration of time and route length.

Paragraph 9.6.2 – Operation

4.17 It is noted that whilst there are no intended closures of PROW to facilitate the operation of the CSET scheme, there could be diversions necessary at crossing points. Any such diversions should not be disproportionate in length compared to the length of the route. The safety of PROW users at crossing points is of critical importance and it is advised that early liaison is undertaken with the Guided Busway Operations Manager to discuss the options for mitigation of the safety risks that have been explored at similar crossing locations on the Cambridgeshire Guided Busway.

4.18 For each of the stops along the proposed transit route suitable consideration should be made for provision of active travel routes to enable users to reach those stops safely. The current provision of NMU facilities along the local roads leading to the transit stops from nearby communities may be inadequate for the increased number (and changed type) of users attracted to those locations by the new transport link.

Specific Comments – Preferred Option Drawings

4.19 Sheet 1 - Francis Crick Avenue is not highway maintainable at public expense and is not subject to any agreement for future adoption as public highway. Therefore the scheme will need to consider whether this section of Francis Crick Avenue requires adoption as highway maintainable at public expense, and the impact of this. Early liaison with the County Council's Highways Development Management Team is encouraged if adoption is intended. If the road is to remain private, maintenance responsibilities will need to be agreed with the current owner of the private road.

4.20 Sheet 8 - The footways to be provided through the Bus Stop site should be constructed to a suitable standard to support the free passage of cyclists (and, where appropriate, equestrian users) around the site, without coming into conflict with pedestrian or motor traffic. Likewise, the access/egress points to the Bus Stop site from the pre-existing highway (Hinton Road) and the new NMU facility should be as felicitous as possible for the intended users.

4.21 Consideration should be given to the appropriateness of current speed limits on the affected area of Hinton Road.

4.22 Consideration should be given to improving the off-carriageway NMU provisions on Hinton Road, to facilitate maximum capacity and optimal safety for users approaching the Bus Stop site from Great Shelford.

4.23 Sheet 9 - The footways to be provided through the Bus Stop site should be constructed to a suitable standard to support the free passage of cyclists (and, where appropriate, equestrian users) around the site, without coming into conflict with pedestrian or motor traffic. Likewise, the access/egress points to the Bus Stop site from the pre-existing highway (Haverhill Road) and the new NMU facility should be as felicitous as possible for the intended users.

4.24 Consideration should be given to the appropriateness of current speed limits on the affected area of Haverhill Road.

4.25 Consideration should be given to improving the off-carriageway NMU provisions on Haverhill Road, to facilitate maximum capacity and optimal safety for users approaching the Bus Stop site from Stapleford.

4.26 Sheets 11 – 13 - The proposed route in these areas approaches/conflicts with parts of the proposed cycle scheme, the Sawston Greenway. There may be scope for both schemes to interconnect in order to provide enhanced links to the community. We recommend that the Cycling Projects Team in the Major Infrastructure Development service are contacted regarding the potential impact of these schemes on one another.

4.27 Sheet 14 - The footways to be provided through the Bus Stop site should be constructed to a suitable standard to support the free passage of cyclists (and, where appropriate, equestrian users) around the site, without coming into conflict with pedestrian or motor traffic. Likewise, the access/egress points to the Bus Stop site from the pre-existing highway (Babraham Road/Sawston Road) and the new NMU facility should be as felicitous as possible for the intended users.

4.28 Consideration should be given to the appropriateness of current speed limits on the affected area of Babraham Road/Sawston Road.

4.29 Consideration should be given to improving the off-carriageway NMU provisions on Babraham Road, to facilitate maximum capacity and optimal safety for users approaching the Bus Stop site from Sawston.

4.30 Sheet 16 - Consideration should be given to the enhancement of roadside cycle tracks and footways leading out of Babraham, between the termination of bridleway 12/12 and the proposed new NMU facility where it crosses High Street (to the south-west). Enhancement of these facilities to permit equestrian use would create a circular bridleway route.

4.31 Sheets 16–17 - The proposed route in these areas approaches/conflicts with parts of the proposed cycle scheme, the Linton Greenway. There may be scope for both schemes to interconnect in order to provide enhanced links to the community. We recommend that the Cycling Projects Team in the Major Infrastructure Development service are contacted regarding the potential impact of these schemes on one another.

4.32 Sheet 18 - Comments on proposed and potential changes to PROW network in the areas around the planned Travel Hub are provided in the sections above.

4.33 Sheet 19 - This sheet does not show any proposed NMU facilities alongside the access road into the Park and Ride site from the A1307 (Cambridge Road, Babraham). We would request that this is given some consideration as a potential NMU link towards the north, where an extensive byway and bridleway network can be accessed at Worsted Lodge, via a quiet side road (Chalky Lane, Babraham).

Strategic Sites Team
Greater Cambridge Shared Planning Service
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GREATER CAMBRIDGE
SHARED PLANNING

Fergus O'Dowd
Transport Infrastructure Planning Unit
Department for Transport
Great Minster House
33 Horseferry Road
LONDON
SW1P 4DR

13 November 2020

Our Reference: 20/04320/CTY

Dear Fergus,

Transport and Works Act 1992 Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006
PROPOSED TRANSPORT AND WORKS ACT ORDER FOR CAMBRIDGE SOUTH EAST TRANSPORT PHASE 2

I am writing further to your letter dated 16 October 2020 in response to the Secretary of State's formal consultation under AOPR 8(4) relating to the above development. This letter and its enclosures provide the formal response on behalf of Cambridge City Council and South Cambridgeshire District Council.

PROPOSAL

The following document was reviewed:

- Environmental Scoping Report, Cambridge South East Transport (CSET) Phase 2, (Revision E, Ref 403394-MMD-ENV-00-RP-EN-0436 - Mott MacDonald, 13th October 2020)

It is noted that the scheme / project is split into 2 phases, as follows:

- Phase 1 – minor scheme delivering road and footway improvements
- Phase 2 (the subject of this scoping exercise):

  - guided transport scheme between the A11 / A1307 junction and the CBC with priority measures
  - new travel hub; new car parking and an interchange with HQPT (2800 cars)
  - non-motorised user facilities.

The scheme is located SE of Cambridge running approximately 8.5km between the A11/A1307/A505 junction and CNC skirting the eastern edges of the villages of Sawston, Stapleford and Great Shelford.

A travel hub is to be located close to the A11 and A505 at the furthest point southeast of the scheme which will provide high quality public transport links to the Cambridge Biomedical Centre and subsequently, the City Centre beyond. There will be 3 stops in between the hub and CBC located at Hinton Way (Great Shelford), Stapleford and Sawston.

Parts of Phase 2 of the CSET Scheme fall within Annex II (10) categories of infrastructure of the EIA Directive and therefore, the proposals require a detailed EIA to be completed and submitted with the application. It is understood that the applicant will seek approval from the Secretary of State under The TWA (Applications and Objections Procedure) (England and Wales) Rules 2006.

SUMMARY

Our response to the relevant topics within the scoping report is provided within the enclosures, which summarise the comments received from consultees. I regret that the authorities have been unable to provide comments relating to sustainable drainage and planning policy, however should comments become available, then these will be forwarded as soon as possible.

I have received representations from Cambridge Past, Present and Future and Stapleford Parish Council, Cambridge International Airport and the Ministry of Defence, which are enclosed for your information and to be taken into consideration.

If you have any questions about the information within this letter, then please do not hesitate to contact me.

Yours sincerely,

Charlotte Burton MRTPI
Principal Planning Officer (Strategic Sites)
Greater Cambridge Shared Planning Service

Enclosures:

1. Environmental Health
2. Landscape
3. Ecology
4. Conservation

Letter from Cambridge Past, Present and Future
Email from Stapleford Parish Council
Letter from Ministry of Defence
Letter from Cambridge International Airport

1. ENVIRONMENTAL HEALTH

The commentary below incorporates all these potential issues and is broken down into the following specific headings / sub-headings and others related to environmental health:

- **SPD – Local General Advice / Requirements**
- **Air Quality - (Chapter 6 of ES Scoping Report)**
- **Community and Human Health - (Chapter 9 of ES Scoping Report)**
- **Noise and Vibration - (Chapter 9 of ES Scoping Report)**
- **Soils, Geology and Land Contamination (Chapter 14 of the ES Scoping Report)**
- **Artificial Lighting – Operational**
- **Environmental Assessment, Mitigation and Monitoring**

SPD - General Local Planning Advice / Requirements

Any artificial lighting, contaminated land, noise / sound, air quality and odours / fumes related impact assessments and consideration of mitigation shall have regard to the scope, methodologies, submission requirements and local planning policies of relevant sections of the Greater Cambridge Sustainable Design and Construction SPD, (Adopted January 2020) https://www.cambridge.gov.uk/greater-cambridge-sustainable-design-and-construction-spd and in particular '*section 3.6 - Pollution* 'and the following associated appendices:

- 6: Requirements for Specific Lighting Schemes
- 7: The Development of Potentially Contaminated Sites in Cambridge and South Cambridgeshire: A Developers Guide
- 8: Further technical guidance related to noise pollution

Due regard should also be given to relevant and up to date Government / national and industry British Standards, Code of Practice and best practice technical guidance.

Air Quality - (Chapter 6 of ES Scoping Report)

We have been asked to comment on *'whether your organisation is satisfied with the report as a basis for an Environmental Impact Assessment and an Environmental Statement, and if not, what further or different information will need to be included'.*

The comments below relate to the potential air quality impacts of the scheme in Cambridge and South Cambridgeshire.

Air Quality Main Points

- The applicant should set the proposal in the context of all relevant national, regional and local policies, including the national Road to Zero and the recently announced Active Travel strategy, as well as the SCDC Zero Carbon Strategy, the Local Plan Policies 36: Air Quality and SC/12: Air Quality, and the Sustainable Design and Construction SPD (2020). Due regard should also be given to the City Council's Air Quality Action Plan titled '*Cambridge City Council*

Air Quality Action Plan 2018 - 2023 In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management 2018 - Version 2, 2019 update'

- The air quality assessment (AQA) should include an analysis of the impact of the additional HDV travelling into Cambridge centre along busy roads, some of which are residential, and into the Air Quality Management Area. The Wider Impact Area (WIA) should be extended to cover this area so that potential impacts can be assessed.

- The Construction and Environmental Management Plan (CEMP) shall detail the emissions reduction measures, including particulate matter and dust mitigation.

- An Electric Vehicle Charge Point Strategy for the Travel Hub is required, detailing Electric Vehicle Charge Point provision and quantum (both active and passive).

- More detail about the Travel Hub is required (see below).

Background

The overall aim of this, and other similar, Greater Cambridge Partnership (GCP) projects is to restrain the volume of traffic travelling into Cambridge, to manage a reduction in the predicted increase in vehicle movements into the centre of Cambridge, and to provide additional public transport in the surrounding areas. Less traffic will result in improved air quality. This report identifies 8 other transport schemes in the area.

The CSET Scheme is made up of three core elements:

1. A new segregated and guided public transport route, with public transport priority measures between the A11 and A1307 junction and Cambridge Biomedical Campus (CBC), that avoids general traffic congestion.
2. A new Travel Hub which will be an area where car parking is provided and an interchange with the HQPT (high quality public transport) will be available.
3. New high-quality non-motorised user (NMU) facilities.

Construction Phase Impacts – Air Quality / Dust

It is currently anticipated that the delivery of the CSET Scheme will be phased over a period of approximately 25 months to include: enabling works and construction activities. Construction is anticipated to commence in April 2023.

Dust releases from the construction phase of development may give rise to loss of amenity / nuisance / annoyance at nearby sensitive receptors and can gave health impacts. As such, it is important that construction dust is scoped into the final EIA document in the form of a suitable dust risk assessment alongside commitments to various management / mitigation and control measures.

It is required that any dust assessment and management plan should reference and have regard to various national and industry best practical technical guidance, such as:

- Guidance on the assessment of dust from demolition and construction, version 1.1 (IAQM, 2016)

- Guidance on Monitoring in the Vicinity of Demolition and Construction Sites, version 1.1 (IAQM, 2018)

Chapter 6.4.2 of the Scoping Report indicates that the EIA will assess construction dust effects in accordance with the Institute of Air Quality Management's (IAQM) 'guidance on assessment of dust from demolition and construction'. This is welcomed. In addition, we will also need the following to be submitted as part of the EIA evidence base:

- Detailed site-specific CEMP or similar containing details of phasing / programming, mitigation and any other details relevant to construction dust

- Compliance with our standard requirements as noted above and in accordance with the requirements stipulated in the Greater Cambridge Sustainable Design and Construction SPD, (Adopted January 2020)

The report proposes that the spatial scope for construction dust impacts will be within 350m of the CSET application boundary, in accordance with the relevant IAQM guidance[1]. This approach is acceptable; dust and particulate matter impacts can be controlled by good site management practices. We expect to see site management practices set out in the proposed Code of Construction Practice (CoCP) and project specific Construction Environmental Management Plan/s. It will be preferable to have any such Plan submitted as an appendix to the ES. Additionally, construction traffic flows will need to be considered when more information is available.

Operational Phase Impacts

Page 25 of the report states that the Environmental Statement (ES) will provide a detailed description of the CSET Scheme including the site location, size and design and other relevant features of the proposed works. The information must include details and confirmation of the arrangements for vehicles and route users at both ends of the route. Some information has been provided, but it is not complete.

1. The Segregated and Guided HQPT runs from the Travel Hub to the Cambridge Biomedical Campus. It is not stated in this report, although it is implied, that vehicles on this route will continue their journey into central Cambridge. There is no indication of how many vehicles will be using the HQPT, or how many passengers, the hours and days of operation initially and in the future. Neither does this report indicate the type of vehicle that will be used. A consultation leaflet in 2019 states that there will be electric vehicles. Consideration of infrastructure requirements for charging of electric buses, including potential grid capacity constraints and how these can be overcome must be included. These are important pieces of information that are required to be able to make an evaluation of the environmental impacts of the scheme.

[1] IAQM (2014) Guidance on assessment of dust from demolition and construction.

2. The Travel Hub (2.5.3 p 19) will be separate from the HQPT route and vehicles. Current assessment is that there will be up to 2,800 car parking spaces, and there may be some coach parking for visiting coaches to Cambridge. Consideration of infrastructure requirements for charging of electric vehicles, including potential grid capacity constraints and how these can be overcome must be included. For example, there is only a suggestion that the potential for solar photovoltaic (PV) panels to be installed over some of the car parking area will be investigated. PV panels could be used to generate electricity to power lighting and EV charge points, so this must be considered. There is no information at this stage about cycle parking including parking for non-standard bikes and cycle security measures. There is no information about provision of electric vehicle charge points (EVCP) for any vehicles. There will be significant demand for EVCP in the year of opening. We understand that Electric Buses will be running on the route, and it is not clear if they will be charged at the Travel Hub or off-site. There is no information about reserved parking areas for car-share, for drop-off and pick-up zones. These are important pieces of information to assess the impact of the mitigation measures.

3. A Non-Motorised User Path along the entire route is planned to create a shared use path to a design that meets the current and future demand from walkers, cyclists and horse riders. Further information about the path will integrate with the travel hub will be required. All newly built cycle access routes must be compliant with Cycle Infrastructure Design Local Transport Note 1/20 (LTN 1/20, July 2020, DfT)[2]. Use of recently provided NMU paths has been greater than anticipated; we expect to see a discussion of demand forecasts and consideration of realistic projected use as part of the scheme design.

Requirements

The proposed development is located in two districts - the South Cambridgeshire District Council (SCDC) and Cambridge City Council (CCiC) and thus and falls under the requirements of both Policy SC/12: Air Quality and Policy 36: Air Quality of the Greater Cambridge Local Plan (2018). These comments should be read alongside the Greater Cambridge Sustainable Design and Construction SPD (2020) which provides further details on Environmental Health requirements pertaining to air quality for developments in South Cambridgeshire and across Cambridge City.

It is noted that both an Air Quality Assessment (AQA) and a Transport Assessment will be provided as part of the Environmental Statement. A Low Emission Strategy (LES) will be also be required to support the planning application.

We will expect to see the additional information in the final Environmental Impact Assessment documents, so that we will be able to form a judgement on the potential impacts of the proposed development.

Air Quality Assessment

[2] https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120

The AQA should quantify any air quality impacts during the construction and operational phases of the development both inside and outside the development area. The assessment methodology is set out in section 6.4 of the report (page 51). The following points should be taken into consideration when undertaking your assessment.

- For the purposes of model verification and as per IAQM Section 6.22.f we would encourage some monitoring prior to the AQA being undertaken at the earliest opportunity. This could be in the form of diffusion tubes located at roadside and key sensitive receptors. This can then be used to verify the modelling. Proposed air quality monitoring locations are to be agreed prior to installation, although the scoping report states that monitoring will start in summer 2020. The applicant should consider supplementing the measurements with those from Cambridge City Council monitoring locations. Results will need to be adjusted to account for the impact of COVID-19 on traffic flows.

- We would expect the roads to be included in the modelling to be agreed prior to the work being undertaken. Affected roads may be different from those meeting the DMRB scoping criteria because congested Cambridge is sensitive to small changes in vehicle flow. Changes in traffic flow on the roads around the Travel Hub must be included, as well as villages with an intermediate hub and around the A1307.

- With regards to significance of impacts, all up-to-date / relevant guidance will need to be considered and utilised as appropriate. For example, EPUK and IAQM have produced guidance on the significance of impacts of changes in air pollution concentrations. In addition, Cambridge City Council has a policy to protect air quality in the Air Quality Management Area from development-related deterioration (Local Plan Policy 36), which should also be considered.

- Traffic data should be provided for the AQA. The data will be AADT with a breakdown by hour, day and vehicle type. Vehicle speeds are also required.

- Results and finding of the assessment are subject to vehicle movements associated with the proposed development being approved by the Cambridgeshire County Council Transport Assessment Team.

- Modelling should take account of the increased bus movements, existing and future congestion/reduced vehicle speeds on the A10 associated with the closing of the railway barrier and anticipated idling/vehicle movements associated with drop off and pick up, not just those parking.

- The assessment shall include an analysis of the impact of electric buses versus diesel buses.

- The detailed methodology should be in accordance with the IAQM ‘Land Use Planning and Development Control: Planning for Air Quality (2017) or as superseded and the Greater Cambridge Sustainable Design and Construction SPD (2019).

- The Scoping Report states that the AQA will use the baseline model developed by consultants commissioned by the GCP; the model runs will be carried out by those consultants in collaboration with the Mott MacDonald air quality technical leader.

- The cumulative impact of the three further HQPT schemes planned by the GCP should be included in the assessment.

Low Emissions Strategy

The LES should provide an integrated package of measures to mitigate the transport impacts of development on local air quality and on climate change. This package of measures should be integral to the design of the development. The LES should bring together the wider benefits of the development; namely restraining vehicle movements towards the centre of Cambridge but also providing a package of mitigation measures to minimise the impact on air quality in the local area. The proposal for the Transport Hub in its current format is for the provision of a car park. Some examples of potential mitigation shall include (but not be limited to):

- Electric Vehicle (EV) Charge Points –The LES should include an EVCP strategy. Further information can be found in the EV Charge Points Infrastructure Advice Note (www.cambridge.gov.uk/air-quality-guidance-for-developers).
- Allocated car parking spaces for car share schemes.
- To encourage no/low emission transport modes to and from the site, consideration of facilities for pedestrians and cyclists should be incorporated into the LES.

More details on cycling parking and storage is required – this should include numbers and types and ensure there is provision for cargo bikes and other non-standard bikes/trikes/e-bikes and e-scooters etc. We would encourage the provision of EV cycle charging facilities. There is no information on the number of spaces that might be provided in the documents that we have. Changing facilities/showers to encourage cycling could be included.

The LES shall have information about integration of cycling and walking routes around the hub with current and planned active travel routes to and from the site. These shall be compatible with the updated higher standards, LTN 1/20, under the direction of the Active Travel Commissioner. The design should ensure straightforward and safe access to the site for people using all types of bike/trike/wheelchair/foot modes.

The applicant is directed to the Greater Cambridge Sustainable Design and Construction SPD for more information on specific mitigation measures that could be used at this development.

Community and Human Health - (Chapter 9 of ES Scoping Report)

It is our view that the community and health assessment should be guided by the Highways England Design Manual for Roads and Bridges (DMRB) *'LA 112 guidance on Population and Human Health - Version 1 Jan 2020'*. We agree that this is considered the most up-to-date and relevant piece of guidance for a linear transport scheme and similar. However, professional judgement is also to be used to guide the assessment where appropriate.

Noise and Health

In terms of operational noise, the scoping report Chapter 12 mainly considers impacts on quality of life and amenity. The numerical noise level parameters / descriptors quoted for LOAELs and SOAELs are commonly related to annoyance and changes in behaviour and/or attitude and character of the area.

However, noise can also have an impact on health at lower levels. Therefore, consideration should be given to operational noise levels and potential health impacts having regard to the recommended noise levels in the following World Health Organisation (WHO) publications

- Guidelines for Community Noise, 1999
- Environmental Noise Guidelines for the European Region 2018
- Night Noise Guidelines (2009) (NNG).
- Managing exposure to noise in Europe (European Environment Agency Briefing - 01/2017)

Health Impact Assessment (HIA)

In terms of the need for a HIA, the environmental health service at SCDC may require a separate health impact assessment as they have specific planning policy on this matter. For major developments or projects, a HIA may be required to be submitted alongside any planning application to demonstrate that the potential impacts on health have been considered at the planning and design stage.

They also have a *'Health Impact Assessment SPD, Adopted March 2011'* : https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/health-impact-assessment-spd/

Lesley McFarlane, Development Officer, Health Specialist at SCDC **t**: 01954 713443 / **e**: lesley.mcfarlane@scambs.gov.uk should be contacted to agree a way forward in relation to any HIA requirements.

Noise and Vibration - (Chapter 9 of ES Scoping Report)

The proposal to use the Design Manual for Roads and Bridges (DMRB): Sustainability & Environment Appraisal – '*LA 111 Noise and vibration'* (formerly HD 213/11, IAN 185/15) guidance which has been recently updated (Version 2 – May 2020) as the most appropriate assessment methodology is noted.
LA111 has been recently published by Highways England and we are not aware of any peer review or public consultation for consideration and comment by interested professional institutes / organisations such as the IOA and CIEH.

However, it is agreed that any assessment should follow the scoping, study area and baseline requirements of LA111 as national / industry best practice guidance.

Baseline Study / Baseline Noise Levels (BNL)

There are a number of sensitive receptors located along the 8.5km route between the CBC and the A11 that may be adversely impacted by noise and vibration from both the construction and operational phases of the project. In order to be able to determine significance of any impacts at either of these two stages of development, it is important
that a baseline noise survey is carried out to establish the existing noise levels in areas within close proximity to the development.

It is noted in Chapter 12.5 that a desktop baseline survey has been carried out using noise maps provided on the Extrium noise map website (available online at: http://extrium.co.uk/). As such, the applicant has forecast various noise levels in the locality. However, given the scale of this project and the number of residents potentially impacted, we consider that it is vital that these desktop numbers can be backed up / verified using actual monitored data as far as reasonably practicable and we recommend that we are consulted on the best approach for this. Also, we understand that the Extrium website is based national noise action planning round mapping and includes some very generic assumptions and is only indicative.

Notwithstanding the above, Chapter 12.4.1 of the Scoping Report confirms that baseline noise surveys "*are yet to be undertaken but will be carried out in order to provide suitable input into both the construction and operational noise assessments that will accompany the EIA*". It is understood that the LA's will be consulted prior to any survey being carried out in order to agree the methodology. This approach is welcomed.

It is assumed that baseline noise levels will be measured at relevant receptors were possible. The location of any measurements should be representative of relevant noise sensitive receptors and this should include residential and public open spaces, as necessary.

BNL measurement locations should be agreed in advance with the local planning authorities (EHOs at Cambridge City and SCDC - as project is cross district).

Construction Noise and Vibration

As mentioned above, it is currently anticipated that the delivery of the CSET Scheme will be phased over a period of approximately 25 months to include: enabling works and construction activities. Construction is anticipated to commence in April 2023.

Chapter 12.7.1 of the scoping report confirms that construction noise and vibration will be scoped into the final EIA documentation and will include consideration of noise and vibration from the following:

- General construction activities
- Construction related vehicle movements
- Construction compounds

It is also confirmed within the report that the assessment of construction noise and vibration will be in accordance with BS 5228:2009 (parts 1 and 2) + A1:2014 "*Code of Practice for noise and vibration control on construction and open sites*".

In addition, the following LOAELs and SOAELs have been provided for construction noise and vibration:

- LOAEL for the daytime and Saturday mornings is 65dB LAeq, T, for night-time is 45dB LAeq, T (in both cases the lower cut-off value in example method 2);
- SOAEL for the daytime and Saturday mornings is 72dB LAeq, T, for night-time is 55dB LAeq, T (in both cases the trigger for noise insulation with 75dB façade converted to 72dB free-field);
- LOAEL for vibration is a Peak Particle Velocity (PPV) of 0.3mm/s; and
- SOAEL for vibration is a PPV of 1mm/s.

If the above levels are to be used, then full justification for source and selection should be provided.

Whilst the LOAELs and SOAELs provide a reasonable guide to the significance of impacts, the applicant must demonstrate a commitment to provision of adequate and suitable noise and vibration mitigation throughout the construction works and be able to demonstrate that Best Practicable means will be selected and utilised at all times – this can be provided in a detailed Construction Environmental Management Plan (CEMP). This should include monitoring including real time noise and vibration as necessary.

In principle, we accept that the proposals for the construction noise and vibration assessment and deem that they are satisfactory. We will expect the following to be provided:

- Detailed noise and vibration assessment carried out in accordance with BS5228:2009 (Parts 1 & 2) + A1:2014
- Detailed CEMP containing details of phasing / programming, mitigation and any other details relevant to construction noise and vibration
- Compliance with our standard requirements as noted above and in accordance with the requirements stipulated in the Greater Cambridge Sustainable Design and Construction SPD, (Adopted January 2020)

However, from experience one shortcoming of BS 5228 is no or little consideration of impulsive / intermittent Maximum Noise Levels (LAmax) and in particular if works are to occur during the night time period (2300 to 0700hrs), the most sensitive time of day. Noise levels may meet LAeq levels for 1 hour at night or similar but residents can be kept awake or are awoken by intermittent LAmax occurrences.

We note BS5228:2009+A1:2014 has maximum levels for vibration but not for airborne noise.

This should be considered in some way **if night time works are envisaged** or commentary / justification should be provided for not considering, so all is transparent.

Operational Noise

Chapter 12.7.1 of the Scoping Report confirms that operational noise will be included in the final EIA submission. The assessment methodology will broadly follow the guidance produced in the DMRB document "LA111 – Noise and Vibration". This guidance document states that the study area should include: "*1) noise sensitive receptors that are potentially affected by operational noise changes generated by the project, either on the route of the project or other roads not physically changed by the project; 2) noise sensitive receptors in areas where there is a reasonable stakeholder expectation that noise assessment is undertaken*." It is also recommended that "calculations are undertaken for receptors within 600m of the physical works associated with the Scheme and 50m of roads which are likely to experience a change of 1dB LA10,18hr upon Scheme opening".

In addition to the above, it is acknowledged that the assessment will comply with the National Planning Policy Framework requirement to "*mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life*".

Noise modelling software will be used to calculate forecast noise from the use of the scheme at sensitive receptor locations (including at locations of committed development) for the opening year and a future year (+15 years from opening) based on available 2026 and 2036 traffic modelling. Three scenario's will be modelled:

- Do-Minimum scenario in the opening year against Do-Something in the opening year (shortterm change with the CSET Scheme)
- Do-Minimum scenario in the opening year against Do-Something in the future year (longterm change with the CSET Scheme)
- Do-Minimum scenario in the opening year against Do-Minimum in the future year (long-term change without the CSET Scheme)

As noted in the air quality section above, there is no indication of how many vehicles will be using the HQPT, or how many passengers, the hours and days of operation initially and in the future. All this detail will need to be fully presented in the EIA in order for us to make an informed judgement.

The Scoping report confirms that "*the significance of the forecast noise levels when the scheme is operational will be considered on the basis of magnitude of impact and with respect to the Lowest Observed Adverse Effect Level (LOAEL) and Significant Observed Adverse Effect Level (SOAEL) values*".

It is stated in 12.4.3.2 that for operation the assessment will consider the potential significance of any changes using criteria based on the classification of impact and noise levels with respect to the LOAEL and SOAEL as follows:

- A potentially significant adverse effect arises for moderate or major impacts (i.e. an increase of 3dB or more in the short-term) where noise levels are above LOAEL; or for minor, moderate or major impacts (i.e. an increase of 1dB or more in the short-term) where noise levels are above SOAEL.
- In all cases where a potentially adverse effect is indicated, professional judgement is used to determine if a significant adverse effect arises that includes consideration of the sources of noise, the causes of the change in noise levels, the magnitude of the impact and noise levels relative to LOAEL and SOAEL
- LOAEL for the daytime is 50dB LAeq, T (free-field) based on BS8233 and LOAEL for night-time is 40dB Lnight, outside (free-field LAeq, T) defined as LOAEL in the WHO night noise guidelines.
- SOAEL for the daytime is 68dB LA10,18h (façade) based on the Noise Insulation Regulations
- SOAEL for the night-time is 55dB Lnight, outside (free-field) based on level above which cardiovascular effects become a major public health concern in the WHO night noise guidelines.

The report also clarifies what will be defined as a potentially significant adverse effect eg for moderate or major impacts (i.e. an increase of 3dB or more in the short-term) where noise levels are above LOAEL; or for minor, moderate or major impacts (i.e. an increase of 1dB or more in the short-term) where noise levels are above SOAEL and goes on to state that:

"In all cases where a potentially adverse effect is indicated, professional judgement is used to determine if a significant adverse effect arises that includes consideration of the sources of noise, the causes of the change in noise levels, the magnitude of the impact and noise levels relative to LOAEL and SOAEL."

Significance of impact / effect assessment – Noise criteria etc

It is noted that the proposed significance of impact assessment will follow the guidance in LA111 for the classification of impacts as negligible, minor, moderate or major, adverse or beneficial and will also consider the potential significance of any changes using criteria based on the classification of impact and noise levels with respect to the LOAELs and SOAELs as detailed.

We find the section 12.4.3.2 potential significance of any changes using criteria based on the classification of impact and noise levels with respect to the LOAEL and SOAEL slightly confusing and justification for selection is not fully detiled. The relative increases in noise levels when compared with the LOAELs and SOAELs levels in LA111 and as quoted are noted.

However, in addition to any increases above absolute type LOAELs and SOAELs ranges as quoted, the relative increase above existing baseline noise level measures is paramount and should also be assessed separately in the short and long term and in particular if the BNL are below the quoted levels for LOAEL etc.

Whilst absolute LOAELs are important the relative increase above BNLs is just if not as important. BNL changes should be reported using all mediums including tables of results; noise contour maps for levels and relative increase above BNLs.

The potential for and the impact of any night-time LAmax occurrences (bus bypasses – number and frequency) should also be considered.

In addition to noise prediction / impacts at or near building facades (façade and free field), the assessment should also consider any impacts that may be experienced in external amenity areas such as private gardens (used for rest and relation) and other noise sensitive spaces such as pubic open spaces.

In respect of the effects of steady continuous noise on outdoor habitable areas, the WHO publication Guidelines for Community Noise recommends that *"To protect the majority of people from being seriously annoyed during the daytime, the outdoor sound level from steady, continuous noise should not exceed 55dB LAeq on balconies, terraces and in outdoor living areas."*

BS 8233 ***'For traditional external areas that are used for amenity space, such as gardens and patios, it is desirable that the external noise level does not exceed***
50 dB LAeq,T, with an upper guideline value of 55 dB LAeq,T which would be acceptable in noisier environments.'

3D sound modelling predictions

It is assumed that 3D sound modelling will be used to predict operational noise levels. It is our view that noise levels should be predicted at 1.5m for ground floor level and 4/4.5 (or other as agreed) for a typical 1st floor window for both day and night time periods for all noise descriptors.

Transport / Travel Hub – Operational Noise

In summary, we accept the proposed methodology for the usage of the guided route (vehicles moving along the 8.5km stretch of the project). However, if sensitive receptors are identified within the vicinity of the transport hub, we also expect that all potential noise sources resulting from the use of the hub will also be assessed in accordance with appropriate guidance. The hub may introduce additional noise sources such as:

- Noise from and associated with traffic / vehicle movements both on / within the site and off-site on local roads as a result of changes in road traffic and vehicle composition (short and long term). Appropriate study area should be selected
- New access points (vehicle breaking and acceleration)
- Cars / buses uses arriving and departing and idling
- Vehicle start-up and accelerations
- Vehicles manoeuvring
- Bus transfer locations
- Bus air / pneumatic sources (breaks bus lowering)
- Car doors / car boots being closed / slammed (acoustic correction features) and
- Any fixed external mechanical plant associated with the proposed uses (if any proposed)

Nonetheless, the operational noise assessment for the project as a whole will need to take account of:

- Daytime noise impacts to include consideration of external amenity areas such as gardens (1.5m high)
- Night-time noise impacts at receptor first floor levels (it is noted that the hub is proposed to operate 24/7)
- Total onsite rating noise and assessment using the principles of BS 4142 for day and night-time periods, and consider LAmax,F levels during night-time periods (specifically for the transport hub).
- Justified impact significance criteria used
- Consideration of the LAeq and LAMax (including times and frequency events exceed background noise levels) as appropriate with windows at existing receptors open and closed at night
- Impact of predicted noise level arising from peak hour period on-site operations day time (0700hrs to 2300hrs) and a peak 15min night time (2300hrs to 0700hrs) at representative noise sensitive receptors

Noise Mitigation

There is no established UK guidance which clearly defines criteria for mitigation thresholds in relation to road traffic noise and LA111 provides little guidance.

Potential mitigation measures should therefore be considered in the ES as necessary, considering suitability, national / industry standards and codes of practice, best practice, recognised guidance and professional judgement.

Soils, Geology and Land Contamination (Chapter 14 of the ES Scoping Report)

Contaminated Land

The Scoping Report proposes to scope out the issue of land contamination. The reasons for this have been fully presented in Chapter 14 *Soils, Geology and Land Contamination*. In terms of encountering residual (historic) land contamination during the construction of the scheme, the footprint of the scheme is very limited and almost entirely located upon previously undeveloped (greenfield) land. Also, due to the nature of the completed CSET scheme and the need to comply with standalone pollution prevention legislation, the potential for significant land contamination to arise once the scheme becomes operational is low. It is noted that potential construction-related land contamination will be included in a Code of Construction Practice (CoCP) and a Construction Environmental Management Plan (CEMP) that will be submitted as part of the Environmental Statement.

We agree with the conclusions of Chapter 14 of the Scoping Report and there is no objection to the proposed scoping out of the issue of land contamination.

Artificial Lighting – Operational

Planning practice guidance – light pollution (Paragraph: 001 Reference ID: 31-001-20191101-Revision date: 01 11 2019) states that *'Artificial lighting needs to be considered when a development may increase levels of lighting, or would be sensitive to prevailing levels of artificial lighting……...Artificial light is not always necessary. It has the potential to become what is termed 'light pollution' or 'obtrusive light', and not all modern lighting is suitable in all locations. It can be a source of annoyance to people, harmful to wildlife and undermine enjoyment of the countryside or the night sky, especially in areas with intrinsically dark landscapes. Intrinsically dark landscapes are those entirely, or largely, uninterrupted by artificial light.'*

The Scoping Report confirms that all lighting will be designed to minimise both vertical and horizontal light spill. Lighting will only be installed in areas of high use, i.e. road crossings, stops along the route, and on the Travel Hub and that the shared use path will have solar studs or similar lighting to provide an indication of the path layout. It is stated that the parking areas, access roads and user facilities would be lit with LED lighting columns. At the Travel Hub lighting is to be LED on overhead columns that minimises light spillage and potential impacts on sensitive receptors.

However, there is no commitment to undertake an actual detailed artificial lighting impact assessment of the scheme.

It is our view, that an Environmental Lighting Impact Assessment (ELIA) covering the likely lighting effects that would result from the construction, operation and decommissioning of the scheme, should be included in the ES.

Artificial lighting is commonly included in Landscape and Visual assessment with night-time (darkness) photomontages comparisons with and without lighting from agreed sensitive viewpoints. However, the assessment should also establish the impact of external artificial lighting on the surrounding baseline environment (the identification of ambient night-time Environmental Zones is crucial to the process of lighting assessment) and in particular the potential impact on any sensitive residential receptors in terms of glare, light trespass and skyglow that may arise from new lighting installations. The ELIA should include predictions of the magnitude of change in light conditions, and where appropriate assess the significance of effects on sensitive receptors. Types of receptors considered include dark skies, nearby communities and ecological receptors.

For human receptors, it is recommended that any artificial lighting installed must meet the Obtrusive Light Limitations for Exterior Lighting Installations contained within the Institute of Lighting Professionals (ILP) *'Guidance Notes for the Reduction of Obtrusive Light - GN01/20 (2020)(or as superseded)'* both on-site and off-site.

The artificial lighting impact assessment will be required to establish lighting during pre and post curfew hours, in accordance with the ILP guidance notes. Vertical illuminance contours predicting light intrusion into residential windows close to the scheme are required and in addition, we will need to see the details of all proposed lighting columns and lamps / luminaires.

The lighting designs for both construction and operation should be developed using the best available technologies. Embedded lighting design and good practice mitigation should always limit light trespass. Additional mitigation should be developed to address potentially significant adverse effects by achieving the following:

- reduce light spill onto sensitive receptors to below thresholds where significant effects are predicted; and
- limit visibility / glare of any new lighting at distant receptors as received.

Environmental Health only consider human health impacts at residential receptors. However, lighting can have wider impacts for example visual, landscape and ecological and other consultees should be contacted / may comment in relation to these matters.

Any ELIA should be undertaken in accordance with and having regard to the ILP publication '*PLG04 GUIDANCE ON UNDERTAKING ENVIRONMENTAL LIGHTING IMPACT ASSESSMENTS'.*

Environmental Assessment, Mitigation and Monitoring

Monitoring for various environmental impacts should be in considered and be in accordance with various monitoring related sections of the various DMRB Sustainability & Environment guidance publications including - LA 104 Environmental assessment and monitoring, LA 105 - Air quality, LA 109 - Geology and soils, LA 111 - Noise and vibration, LA 120 - Environmental management plans, LD 119 - Roadside environmental mitigation and enhancement.

'LA 120 - Environmental management plans' is particularly relevant and provides a framework to manage the environmental effects of projects to demonstrate compliance with environmental legislation, by providing a plan for the delivery of the project's design, mitigation, enhancement and monitoring commitments.

EMPs will need to clearly set out the conclusions and the actions needed to manage environmental effects identified within the environmental assessment during construction and operation of the scheme.

Cumulative Impact Assessment

Section 4.6 Cumulative Impact Assessment - 4.6.1 Methodology of Assessment states that:

'The proposed methodology for assessing the cumulative effects is based on The Planning Inspectorate guidance within which the ES will consider the following types of cumulative effects:

- *Combined effects - the combination of individual environmental topic effects from the CSET Scheme on a particular receptor*

- *Cumulative effects - effects due to interactions between the CSET Scheme and other reasonably foreseeable, nearby future developments of an appropriate scale outside the Scheme boundary.*

Cumulative effects from the CSET Scheme alongside other developments in its vicinity will be assessed according to each topic and summarised in a Cumulative Effect chapter in the ES.'

This general approach is acceptable but having reviewed the various chapters relevant to environment health as detailed above and Chapter 9 - Community and Human Health, there is no specific reference to combined / in combination effects and how these will be assessed in term of impacts on health and quality of life / amenity.

Clearly a sensitive receptor experiencing significant or adverse noise, poor air quality and artificial lighting impacts simultaneously will synergistically experience a greater overall cumulative adverse impact than when exposed to just one adverse impact.

It is also noted that LA 111 '*Table 3.60 Determining final operational significance on noise sensitive buildings'* considers non-acoustic factors. Likely perception of change by residents - if the project results in obvious changes to the landscape or setting of a receptor, it is likely that noise level changes will be more acutely perceived by the noise sensitive receptors.

Such in-combination effects should be considered.

2. LANDSCAPE

This consultation response provides comments on the Landscape and Visual Impact chapter (Chapter 11) of the submitted Environmental Impact Assessment Scoping Report (13 October 2020 by Mott MacDonald) for the Greater Cambridge Partnership.

Our comments on the submitted information are provided below and are generally set out under the same headings and referenced against the corresponding paragraph numbers within the Scoping Report.

Overall Chapter 11 is written in a clear manner and covers the general scope of landscape and visual issues to be included in the subsequent Landscape and Visual Impact Assessment (LVIA) chapter of the EIA. Our comments relate to some discrepancies in the interpretation of policy requirements, clarification of methodology, design approach to landscape integration and protection, approach to landscape management and observations regarding the selection of photomontage locations which we would wish to agree with the GCP Landscape Architect as the design scheme and LVIA evolve.

Save for some requested minor amendments or clarifications, the methodology is considered to be generally compliant with the thrust of the guidance in DMRB and GLVIA3.

Consultation

Page 21 The key elements relevant to the environmental design are outlined and include:

- *"Fitting into the Landscape: The majority of the route alignment from CBC to the Travel Hub site at Babraham, crosses an open area of Green Belt. The design of the CSET Scheme will need to fit into the landscape setting as closely as it can. This may mean the landscaping design focuses on minimising the footprint whilst screening close and distant views of the CSET Scheme".*

It is unclear if the points noted in the bullet above, are intended to read solely in relation to Green Belt or are inter-related. The location of the site in Green Belt is recorded but the need to preserve openness should also be linked to this. In terms of 'fitting into the landscape' a key element should also be to respect and enhance the character of the local landscape, with particular regard to the sensitive design of alignment, planting, earthworks and structures. The suggested option of focusing landscape design on minimising the footprint of the scheme might assist in certain locations but in other locations could result in, for example,

steep/artificial earthworks or limited space for planting that might appear out of character in its own right and so should not be seen as the key aim to achieve landscape integration.

Page 29 A brief description of the approach to the LVIA is provided, in order to introduce the supporting documents that will be produced. The text has been over summarised and therefore doesn't accurately reflect the LVIA process and misses steps between assessing landscape value and predicting landscape effects. This should be updated for accuracy.

Para 4.9 Construction Environmental Management Plan. This notes that mitigation measures included in the design or operational plan for the Scheme will be reported in the CEMP for the appointed contractor to take forward into construction. What happens beyond the construction phase? A separate LEMP should also be provided to address ongoing and long terms landscape and ecological maintenance and management operations beyond the construction phase. Will the scheme include any accommodation works that devolve back to landowners that will also need to be subject to the CEMP and LEMP?

Para. 11.2.2 Relevant paragraphs of NPPF 2019 are referenced as Policy numbers but should be recorded by relevant section or paragraph number.

Under Protecting Green Belt Land, it would be helpful to reference the great importance that is attached to Green Belts, the essential characteristics and the requirements regarding exceptional and very special circumstances.

Para. 11.2.4 South Cambridgeshire District Council Local Plan 2018. Policy NH/2: Protecting and Enhancing Landscape Character – the policy requirement is more stringent than stated. Development must respect and retain or enhance the local character and distinctiveness of the local landscape and the National Character Area in which it is located (not just "aim to retain or enhance" as stated in the scoping).

Section 11.3 Study Area. The study area is proposed to extend 2km each side of the centre line of the CSET Scheme and perimeter of the Travel Hub. This is broadly acceptable but as we are unclear about the proposed heights of built elements that have been modelled and whether lighting has been included in the ZTV (presumably these features are also subject to a degree of change during the ongoing design process), we would recommend that receptors beyond 2km should not be fully scoped out at this stage. Whilst any landscape and visual impacts could be negligible, this would depend mostly upon the height of built elements which is unknown at this stage.

It is unclear whether a single ZTV would be prepared or whether Day 1/Year 15 could usefully be demonstrated in order to help indicate the potential impact of mitigation and potential visual envelope in the longer term.

Para. 11.4.2 The combined approach to the assessment methodology using GLVIA3 and DMRB LA107 (formerly DMRB Volume 11 Section 3 Part 5 and IAN 135/10) is supported, rather than solely utilising DMRB LA107 as might usually be the case for a highways/infrastructure scheme.

As views from private properties are being assessed, reference should also be made to the Landscape Institute's Technical Guidance Note 2/19 on Residential Visual Amenity Assessment (15 March 2019).

Table 11.1 The table should reference 'Typical' Criteria for assessing landscape value, similar to the other tables throughout the methodology and allowing scope for professional judgement where a receptor does not meet all of the defined criteria for value. It would also be helpful to clarify that for any of the criteria and value rankings, the landscape may also be undesignated (ie. as established by case law and reflecting GLVIA3 (paragraphs 5.19-5.26) and the European Landscape Convention).

Page 132 Visual baseline. It would be helpful to include typical criteria and rankings for visual value to demonstrate balance and transparency.

Page 132-133 Assessment criteria are provided for landscape value and for landscape sensitivity but not for landscape susceptibility. This should be included for transparency and robustness.

Para 11.4.4 Photomontages are welcomed. The proposed locations appear broadly acceptable at this stage but we would need to agree these on the ground with the GCP's Landscape Architect to understand the rationale of their selection (and non-selection of other locations). Based upon the design proposals in Appendix A of the Scoping Report, our review of OS mapping and baseline information provided and our knowledge of parts of the local area, we make the following observations:

- There are a number of sections on embankment as well as junctions, bridges and a passenger stop, located throughout the southern side of the scheme that look to be picked up in some of the proposed photomontage locations (eg. 8, 14a and 15) but these

would be quite close distance views. Consideration should be given to including footpath no. 2, east of Sawston and Rowley Lane (bridleway no. 12) west/south-west of Babraham to help demonstrate how the CSET will appear in views from the village edges and wider countryside.

- Similarly, it would be useful to include views that demonstrate how the CSET would appear in relation to the village edge of Sawston (currently no views are provided in this direction) in particular as there are sections on embankment, road junctions and a passenger stop at the village edge.
- A photomontage showing the northern end of the CSET and it's relationship with the countryside edge of Cambridge and Great Shelford should be considered – potentially from Granhams Road looking south towards Great Shelford.

Para 11.5.2 Visual receptors. We have not had the opportunity to inspect the viewpoint locations identified and without the benefit of details of heights of structures, earthworks etc, cannot corroborate the nature of the views described at this stage. We would agree that the receptors identified appear to cover the broad range of locations and users likely to be affected by the CSET but this would need to be reviewed as the scheme is detailed and further ZTV modelling and site visits are carried out.

Para 11.5.3 The inclusion of the strategic viewpoint at Little Trees Hill on Magog Down is welcomed (LVIA Scoping View 10, Cambridge Local Plan Strategic View 7), acknowledging the noted caveat that the CSET scheme should not impact upon skyline.

Para 11.6.1 Page 142. Visual. Second paragraph. Final sentence. This should also include users of public open spaces.

Para 11.6.2 Page 142. Potential impacts on landscape character and visual amenity during operation are listed. Please also include:

- Presence of earthworks and bridges

Para 11.4.2 Page 143. Photomontages. Please see comments made re. paragraph 11.4.4 above.

Para 11.7.1 Page 144. The impacts of the CSET scheme on the openness of the Cambridge Green Belt are noted in this paragraph as being scoped into the LVIA but the approach to this doesn't appear to have been addressed elsewhere in Chapter 11. Please confirm how Green Belt impacts will be addressed in landscape and visual terms.

Appendix A Heights of structures and the extent of land take and therefore extent of any potential landscape mitigation measures and any accommodation works are not clear from the drawings at this stage and therefore comments on the LVIA chapter of the scoping are made on a precautionary basis. We would expect the study area, selection of landscape and visual receptors and photomontage viewpoint locations to be reviewed as the scheme design continues to evolve.

General The night-time effects of lighting should also be assessed in the LVIA. It may also be appropriate to include photomontages in this regard.

3. ECOLOGY

The CSET is a new transport route proposed by the Secretary of State to provide high quality public transport (HQPT) between a new transport hub located between Babraham and the A11/A1308 junction and the Cambridge Biomedical Campus (CBC) at Francis Crick Avenue.

A majority of the route travels through arable farmland; however there are areas of grassland, woodland, hedges, rivers, and ditches that the route will affect. The transport hub and route does not pass through any statutory protected site; however it does fall within the Impact Risk Zone of the Sawston Hall Meadows SSSI, Dernford Fen SSSI, Gog Magog Golf Course SSSI, the Roman Road SSSI, and passes close to the Nine Wells Local Nature Reserve (LNR) and Beechwoods LNR. The route is within 30 km of Eversden and Wimpole Woods Special Area of Conservation (SAC) which has been designated for its maternity roosts of the nationally rare barbastelle bat. The Route Crosses the River Granta County Wildlife Site (CWS) twice and passes close to several other non-statutory protected sites. Species records show great crested newts (GCN) and other amphibians, barn owl and other breeding birds (including farmland bird species), white-clawed crayfish, flowering plants, invertebrates, reptiles, bats (including barbastelle bats), brown hare, badger, otter, water vole, polecat, and hedgehog have all been recorded locally.

The ecological surveys so far undertaken appear to cover the required scope. These include bat transect and roost surveys, otter, water vole, white-clawed crayfish, great crested newt, wintering and breeding birds, invertebrate, kingfisher, hedgerow, habitat, and river corridor surveys. Based on the available desk data this appears to be sufficient to provide a baseline for the EIA.

The document provides an accurate account of all statutory and non-statutory protected sites that are within the zone of influence of the route. This includes the Eversden and Wimpole Woods SAC which is within 30 km of the route and is designated for its bat population. Cambridgeshire is a stronghold for the barbastelle bat, which is a nationally rare species; therefore any impacts to this species may impact not only the SAC but also the conservation status of this species nationally. Therefore particular attention must be paid to this species. The roosts within the SAC are maternity roosts, and therefore the bats directly associated with the SAC are generally female. However as male barbastelle bats generally remain solitary for a majority of the time, they will commute to find females therefore singular commuting male barbastelle bats outside of the known Impact Risk Zone of the SAC may also be directly associated with the SAC. The Scoping document has confirmed that a Habitats Regulation Assessment (HRA) will be undertaken as part of the EIA.

Currently no GCN population surveys have been undertaken due to covid 19 restrictions; the ecologists are intending to undertake eDNA surveys of ponds to inform the Environmental Statement. GCN District Level Licencing (DLL) is now available within Cambridgeshire. It is understood that the route or its zone of influence will not pass through any “Red Zones” therefore it might be an option to go through this process as population data is not available.

4. CONSERVATION

Make no comments.

CAMBRIDGE
INTERNATIONAL AIRPORT

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Charlotte Burton
Greater Cambridge Shared Planning
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA

9th November 2020

Dear Charlotte,

Re: Planning Application No. 20/04320/CTY

Our Ref: P036.20

We refer to your letter dated 27th October 2020, received in this office on 27th October2020.

The proposed development has been examined from an aerodrome safeguarding perspective and does not conflict with safeguarding criteria. We, therefore, have no objection to this proposal.

Yours sincerely

Scott Litchfield
For and on behalf of Cambridge Airport Limited

Ministry of Defence

Defence Infrastructure Organisation

South Cambridgeshire District Council
Planning Services,
Cambourne Business Park,
Cambridgeshire
CB23 6EA
England

Safeguarding Department
Statutory & Offshore

Defence Infrastructure Organisation
Kingston Road
Sutton Coldfield
West Midlands
B75 7RL

Tel: 07929350658
E-mail: DIO-safeguarding-statutory@mod.gov.uk

www.mod.uk/DIO

Your reference: **20/04320/CTY**
Our reference: 10049541

05 November 2020

Dear Sir/Madam,

MOD Safeguarding

Proposal: Consultation on request to the Secretary of State for an opinion on the scope of an Environmental Statement proposed to be submitted in support of an application to be made under the Transport and Works Act Order process for the development known as Phase 2 of Cambridge South East Transport Scheme (CSET).

Location: Cambridge Biomedical Campus Cambridge Cambridgeshire

Grid Ref: 546084, 254890

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office on 27/10/20. I can confirm the MOD has no safeguarding objections to this proposal.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely

J. Blanchard

Jacqueline Blanchard

Assistant Safeguarding Manager

From: @staplefordparishcouncil.gov.uk
Sent: 10 November 2020 14:44
To: Charlotte Burton <Charlotte.Burton@greatercambridgeplanning.org>; Planning <planning@greatercambridgeplanning.org>
Cc:
Subject: Response to 20/04320/CTY DfT consultation for CSET

Dear Charlotte,

I am writing in response to 20/04320/CTY | Consultation on request to the Secretary of State for an opinion on the scope of an Environmental Statement proposed to be submitted in support of an application to be made under the Transport and Works Act Order process for the development known as Phase 2 of Cambridge South East Transport Scheme (CSET). | Cambridge Biomedical Campus Cambridge Cambridgeshire

I am unclear if South Cambs Council is also responding to the DfT or if there will be a joint response from the planning service. If it is the former, then I would be grateful if you could also forward this email to the person at South Cambs who is dealing with this.

Stapleford Parish Council identifies strongly with the points made in the attached CPPF letter and fully endorses them. I trust that you will accept Stapleford Parish Council as a formal Consultee and take our comments into consideration when responding to the Department for Transport.
Kind regards.

Chair Stapleford Parish Council

Fergus O'Dowd
Transport Infrastructure Planning Unit
Department for Transport
Great Minster House
33 Horseferry Road
London, SW1P 4DR

By email to:
transportinfrastructure@dft.gov.uk

CAMBRIDGE PAST, PRESENT & FUTURE

Cambridge Past, Present & Future
Wandlebury Country Park
Cambridge CB22 3AE
Phone 01223 - 243830
www.cambridgeppf.org

10/11/2020

Dear Fergus

Consultation on request to the Secretary of State for an opinion on the scope of an Environmental Statement proposed to be submitted in support of an application to be made under the Transport and Works Act Order process for the development known as Phase 2 of Cambridge South East Transport Scheme (CSET)

Cambridge Past, Present & Future is Cambridge's largest civic society. We are a charity run by local people who are passionate about where they live. We operate in the greater Cambridge area and working with our members, supporters and volunteers we:

- Are dedicated to protecting and enhancing the green setting of Cambridge for people and nature.
- Care about Cambridge and are an independent voice for quality of life in the strategic planning of Greater Cambridge.
- Are working to protect, celebrate and improve the important built heritage of the Cambridge area.
- Own and care for green spaces and historic buildings in and around the city for people and nature, including Wandlebury Country Park, Coton Countryside Reserve, Cambridge Leper Chapel & Barnwell Meadows, Bourn Windmill and Hinxton Watermill.

Cambridge Past, Present & Future has considered the EIA scoping report and believe that preparation of an Environmental Statement is premature at this stage. We have set out why below and also provided additional comments.

1. Preferred Scheme Optioneering

1.1 Re-use of Haverhill-Cambridge rail line

There is another option which is not highlighted in the EIA scoping report and which has never been put forward for public consultation, despite scoring more highly than some options which were. This is the option for the scheme to use the former Cambridge-Haverhill rail route through Great Shelford and Stapleford and on to Sawston. This option has many advantages over the GCP's preferred option including:

- It will better serve the villages of Great Shelford and Stapleford, helping to increase use.
- It will avoid harm to over 3km of green belt.
- It will avoid the need for visually damaging infrastructure such as the bridge shown in the image below (visualisation published by GCP Oct 2020).

In June 2020 the Executive Board of the GCP received a report regarding the re-use of the railway line, which indicated that this was not feasible. As a consequence, the Executive Board voted to pursue the preferred option proposed in this EIA scoping. We consider a number of elements in the GCP report to be flawed and there is a need for more detailed analysis. However, the GCP has been unwilling to commission further work into the feasibility of reusing the former rail line. To address this failing, local parish councils and community groups have raised funds to commission an independent technical report. The specialist transport consultancy i-Transport have been commissioned to carry out this work and their final report is due in the next couple of weeks We have reviewed a draft of their report which concludes that the option to align the route along the former railway and through the villages of Great Shelford and Stapleford is feasible, and there are various viable options available to overcome the constraints.

The choice between the two options (the GCP route, or the route following the former railway through the villages) rests on value judgements about the costs and benefits of the two schemes. However, an exercise in comparison between the two options has not yet been adequately carried out and it has not been consulted upon. For example, no attempt has been made to put a value on the green belt, countryside and local amenity which will be damaged by the preferred option but which would be much reduced by re-using the former rail route.

We believe that it is premature for the GCP to submit an EIA scoping at this stage, until further assessment is carried out on the feasibility, the cost-benefits and policy compliance of re-using the railway line.

1.2 Choice of public transport vehicle

No decision has yet been made on what type of vehicle might eventually run on this infrastructure. It could be some form of guided bus, but it could also be light rail as this is still being considered for a future Cambridge Metro which would run on this route. The form of transport used and the nature of any guidance system will partly determine the impact.

For example, whilst the land take might be similar for both the optical and kerb-guided bus systems the visual impact will be different. Moreover, a light rail option could require less land-take because it has physical guidance provided by the rails, and potentially could operate closer to the existing rail line.

We believe that it is premature for the GCP to submit an EIA scoping at this stage, until further clarity is provided on what type of vehicle will use it – in order to adequately assess the impact and whether the best route option has been selected.

2. Cumulative Impact

The EIA scoping does not include proposals for Cambridge South Station. Whilst that scheme is not yet approved it is roughly at the same stage of development as the CSETS scheme and is in the same location and would need to be constructed ahead of the CSETS scheme. There will clearly be a significant cumulative impact caused by two major transport infrastructure projects taking place in the same location. **We believe that the ES should consider the cumulative impacts associated with Cambridge South Station.**

3. Air Quality - Construction Dust

The CSETS scheme will be constructed close to Magog Downs. This is a chalk grassland restoration site which is relatively new and therefore it is not currently designated, but it would meet the criteria for Local Wildlife Site status. It is further than 200m from the CSETS route but it is downwind (from prevailing wind direction) from the CSETS scheme. Magog Downs would be susceptible to (ie damaged by) nitrogen deposition from construction dust. **The ES should consider the impacts of construction dust on Magog Downs.**

4. Biodiversity

4.1 Non-Statutory Sites for Nature Conservation

Magog Downs is a chalk grassland restoration site which is relatively new and therefore it is not currently designated, but it would meet the criteria for Local Wildlife Site status. It is located within sight of the CSETS scheme and therefore should be included in the list of Non-Statutory Sites for Nature Conservation. We would also advise that Stapleford Chalk Pit also be included.

4.2 Scoped-In

There is not a direct reference for the potential of the scheme to impact on the River Granta CWS from vehicle pollution due to run-off or the impacts that could be cause by the scheme increasing or decreasing water flows.

5. Landscape

5.1 Photo-montage

The most significant impacts of this scheme on the landscape and views will be:

- between Nine Wells and north-east of Stapleford
- crossing the River Granta
- in the vicinity of Babraham
- users of the NMU adjacent to the busway

The ES should prioritise photo montages which will show the impact in these key locations. As well as the locations shown we believe that photo montages should be included for:

- Hinton Way, looking both north and south
- Nine wells looking towards Hinton Way

- From the public right of way between Stapleford and Babraham, where the busway crossed the PROW.

We would welcome discussion with the GCP about the exact location of photomontages.

5.2 Local Landscape Character Assessment

A local landscape character assessment for South Cambridgeshire is being carried out by Chris Blandford Associates for the Greater Cambridge Local Plan. This work should be completed by early 2021 and available to the GCP to use. This should be included in the landscape character assessment for the CSETS scheme.

5.3 Visual Receptors

There is a significant omission from the scoping report. Visual receptors will also be people using local roads. In the study area this includes cyclists, walkers and horse-riders as well as people using vehicles. There will be clear/unfiltered views from:

- Granham's Road
- Hinton Way
- Haverhill Road
- Sawston Road
- Babraham High Street

These must also be included in the ES.

In addition, those people who use the new NMU once it is constructed will also be confronted with a significant piece of transport infrastructure cutting through the landscape (they will be users of it). At present such views are not being considered because the land is private but after construction these views will exist and it is important to understand what it will look like and how the impacts will be mitigated.

6. Land Use & Land Take/Green Belt

One of the biggest likely impacts of this scheme on the environment is that it will create a demand for new development on the edges of existing villages. The Greater Cambridge Local Plan process is underway and already a significant area of land adjacent to CSETS has been put forward for future development in anticipation of this scheme (this land is in the green belt)**. The ES methodology must take into account the indirect impact that the CSETS Scheme will have on future development in the vicinity of the scheme. T**he GCP can use the evidence base for the Greater Cambridge Local Plan to assess this, as well as considering issues such as the extent to which land parcels will be created that are likely to facilitate future development and/or removal from the Green Belt.

The scoping report accepts that almost all of the route will be in the green belt but seems to focus on how the effects of using green belt land can be mitigated by minimising the extent of the visual impacts that will arise. However, there are other elements of green belt policy which should also be addressed by the ES but which do not appear to be mentioned in the report. If we look at what the NPPF has to say about the main purposes of the green belt it is obvious that it is not enough to say how you are going to minimise the effects of taking land from it - but proving why you have to do so in the first place. Para 134 sets out the key purpose and includes the need to avoid encroachment on green belt land. Para 146 does say that the need for infrastructure may be acceptable in the green belt (i.e. not inappropriate) but applicants must prove that it is necessary and unavoidable to take green belt land, and they must preserve its openness and not interfere with the other intentions for the designation of the green belt in the first place.

Where there are alternatives that are less destructive of the green belt then it can be argued that these should be given greater weight even if they may be a little more expensive, and might take a little longer to achieve. We cannot see that in the list of assessments the GCP are proposing to give the material weight to the green belt that is fully justified in planning law and practice, and in their summary at Table 19.1 of the impacts to be scoped for further assessments green belt does not get a separate mention at all.

In para 13.3 the GCP cites the National Policy Statement on National Networks and the reference in it to linear infrastructure needing to pass through the green belt. However here it says that it will be necessary to consider whether the proposal meets green belt objectives and it is not really credible that a route such CSETS could be argued as meeting any of any of the objectives set out in para 134 of the NPPF. The GCP cite this NPSNN but only address the part that they think helps their case, not the strong caveats it contains.

7. Overall Project Timetable

Network Rail intends to construct Cambridge South Station during the same timeframe as the CSETS scheme. For their construction compound Network Rail require the use of land which is earmarked for the CSETS scheme. Network Rail will therefore need to construct the station before the CSETS scheme. This does not accord with the timetable set out in the EIA scoping.

8. Conflict of Interest

We note that you have consulted South Cambridgeshire District, Cambridge City and Cambridgeshire County. These three organisations are the Executive Board of the GCP, and they are the applicant for this scheme.

I trust that you will take our comments into consideration.

Yours sincerely

James Littlewood

James Littlewood
Chief Executive

Cambridge Past, Present & Future — The local charity that cares about Cambridge and its green landscapes Charity No 204121.

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Mr Fergus O'Dowd
Planning Casework Officer
Transport Infrastructure Planning Unit
3rd Floor East Wing
Albany House
94-98 Petty France
Westminster
London
SW1H 9EA

13 November 2020

Dear Mr O'Dowd,

PROPOSED TRANSPORT AND WORKS ACT ORDER FOR CAMBRIDGE SOUTH EAST TRANSPORT PHASE 2 (CSET) EIA SCOPING REPORT

Thank you for providing Network Rail with the opportunity to comment on the EIA Scoping Report for the CSET scheme.

For the purposes of the Scoping Opinion we are pleased to set out below those matters which we consider relevant in the context of the development site's proximity to our infrastructure and consideration of cumulative impacts with the proposed Cambridge South Infrastructure Enhancements (CSIE) scheme being developed by Network Rail.

Please note that Network Rail has a statutory obligation to procure the availability of safe train paths and as such we are required to take an active interest in any construction/demolition activity adjacent to our property that potentially could affect the safe operation of the railway.

On specific matters, clearly our key interest is to protect the physical railway infrastructure. As part of the development bounds the West Anglia Main Line south of the Cambridge Biomedical Campus the EIA should demonstrate that the railway infrastructure will not be compromised and be adequately protected.

Part of this will be to demonstrate that the development will not interfere with the existing railway drainage and that all surface and foul water arising from the proposed works will be collected and diverted away from our property.

Sustainable drainage proposals should take into account the impacts upon adjacent railway infrastructure, i.e. proposals must not import a risk of flooding, pollution, soil slippage onto the existing operational railway. Sustainable drainage systems within the area should be directed away from the railway and should not use soakaways within 30m of the railway boundary. Attenuation ponds/basins on sites adjacent to or near to the railway boundary should only be included in proposals with the agreement of Network Rail and should not be included in proposals that are adjacent to a railway cutting.

Security of the railway boundary will require to be maintained at all times. If the works require temporary or permanent alterations to any mutual boundary the applicant must contact Network Rail Asset Protection Team.
Consideration should be given to ensure that the construction and subsequent maintenance can be carried out to the CSET route or any proposed buildings without adversely affecting the safety of, or encroaching upon Network Rail's adjacent land. Therefore all/any building should be situated at least 2 metres from Network Rail's boundary. This will allow construction and future maintenance to be carried out from the applicant's land, thus avoiding provision and costs of railway look-out protection, supervision and other facilities necessary when working from or on railway land.

Should any maintenance access rights to the railway for which Network Rail has access rights, including pedestrian ones, be identified in the area, these will need to be taken into consideration in any new scheme. In addition, the EIA should cover how the maintenance of the future Cambridge South Infrastructure Enhancements (CSIE) scheme will not be prejudiced by the development.

With regard to construction traffic, specific consideration should be given to the effect of large trailers over our level crossings: to present the possibility of grounding some additional works may have to be carried out at the relevant level crossing. This should be considered as part of the Transport Assessment.

The Temporal Scope identifies a period of construction similar to that of the CSIE scheme. In light of this it will be important to consider construction phasing, use of compounds, access roads and staging. In order to construct the new Cambridge South Station direct access to the West Anglia Main Line will be required by Network Rail so location of CSET construction compounds should not prejudice this.

Table 4.3 does not list the Cambridge South Station (part of the CSIE scheme) to be considered in the Cumulative Impact Assessment. The new station is mentioned in 2.3.1 so Network Rail expects that the CSIE scheme will be assessed in the cumulative impact assessment.

I trust full cognisance will be taken in respect of these comments. If you have any further queries or require clarification of any aspects, please do not hesitate to contact me.

Yours faithfully,

Elliot Stamp
Town Planning Manager (Anglia)
For and on behalf of Network Rail

To: Greenhill, Stephen
Subject: RE: Scoping opinion consultation for Cambridge South East Transport Phase 2

Mr Fergus O'Dowd | Planning Casework Officer, Transport Infrastructure Planning Unit, Department for Transport
3rd Floor East Wing | 07866013025 |
Post to: Great Minster Hse, 33 Horseferry Rd, London, SW1P 4DR

From: Greenhill, Stephen [mailto:Stephen.Greenhill@highwaysengland.co.uk]
Sent: 17 November 2020 15:04
To: Fergus O'Dowd <Fergus.O'Dowd@dft.gov.uk>
Cc: Baldrey, Simon <Simon.Baldrey@highwaysengland.co.uk>; Eastman, Marcia <Marcia.Eastman@highwaysengland.co.uk>
Subject: FW: Scoping opinion consultation for Cambridge South East Transport Phase 2

Good afternoon Fergus

We have now read through the scoping report, agree with the decisions on scoping and have only a couple of minor comments.

P64; Table 7.1 – Designated sites for Bats – Incorrectly references old DMRB guidance. Should reference LA115
P86; Para 8.4.2 – Operation – The first line stated the climate risk assessment will consider the 2090's. This appears to be a typo as in context of the rest of the paragraph I think is should read 2080's
P99; Para 9.4.2.2 – The approach is good but seems focussed on the epidemiological determinants of heath but not the social determinants of health such as access to open space and recreation; and impact on ability to access health care facilities. I think this is touched on in later paragraphs but we would just like to flag it as the two elements of Health impact assessment are both important.

I hope that these comments are helpful, they constitute the formal response of Highways England.

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Please note that my standard working days are Tuesday, Wednesday and Thursday

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From: Fergus O'Dowd [mailto:Fergus.O'Dowd@dft.gov.uk]
Sent: 13 November 2020 12:00
To: Greenhill, Stephen <Stephen.Greenhill@highwaysengland.co.uk>
Cc: Baldrey, Simon <Simon.Baldrey@highwaysengland.co.uk>; Eastman, Marcia <Marcia.Eastman@highwaysengland.co.uk>; Colin Dunn <Colin.Dunn@dft.gov.uk>
Subject: RE: Scoping opinion consultation for Cambridge South East Transport Phase 2

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