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Inspector Kevin Ward
c/o Local Plan Programme Officer,
Huntingdonshire District Council,
Pathfinder House,
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BY EMAIL & POST

20th September 2018

Dear Mr Ward,

HUNTINGDONSHIRE LOCAL PLAN EXAMINATION – ST IVES & GIFFORD'S PARK

I write with reference to the above and further to discussions at the Matter 8 St Ives Spatial Planning Area Hearing Session in relation to strategic highways modelling for the St Ives SPA in general and my client's proposals for Gifford's Park in particular. You may recall that in the discussion I drew attention to the extent of technical engagement that my client has undertaken with both HDC and CCC vis-à-vis to the Gifford's Park proposal. This has included securing pre-application advice and formal ES screening and scoping; and TA scoping with CCC.

However, the opportunity for developers to engage in a meaningful way with the Strategic Modelling that has informed the LP development strategy has consistently been resisted by HDC/CCC. We first raised this matter in March 2016 in correspondence with HDC on publication of the Overview & Scrutiny (Economy & Growth) Panel Report of the 8th March 2016. A copy is attached together with our letter to the Council's Head of Development dated 4th March 2016. We received no response to this letter, nor to our subsequent letter dated the 3rd May 2017 that followed publication of the HELAA 2016 and completion of the pre-application advice exercise. A copy of that letter is also attached, together with the formal HDC and CCC advice in response to our request for pre-application advice.

We have subsequently scoped for ES purposes (18/70112/SCOP) and a copy of the Scoping Report and the Council's adopted Scoping Opinion are attached. A separate TA scoping exercise had been undertaken with CCC and a copy of the advice received was incorporated within Appendix 3 of the Scoping Report. Notwithstanding, we have continued to face resistance from CCC to allow access to the strategic highways modelling and consequently have pursued the matter by way of representations to the submitted LP and the submission of Hearing Statements in response to your Matters and Questions. Following the Matter 3 hearing session, we took up the invitation to access data from the transport modelling.

Unfortunately, as explained in our Supplemental Hearing Statement, we still have considerable concerns about the modelling undertaken and consequently the robustness of the conclusions that have been reached vis-à-vis the LP development strategy insofar as it relates to strategic scale development at St Ives. The critique of the modelling raised in our Hearing Statement and Supplemental Hearing Statement have not been addressed and at the hearing session CCC suggested for the first time that a comparison between strategic modelling scenarios 3 and 5 can properly be made as "a proxy" for assessing the standalone impact of a strategic scale allocation at St Ives in general and at Gifford's Park in particular. In this regard we must comment as follows:-

- i. When asserting “significant detrimental impact”, CCC were referring you to Table 12 of the HSTS on page 32. This table presents the impact of Development Scenario 3 on the existing road network (i.e. without any mitigation). We regret to say that this was misleading and is not a fair comparison, as Gifford’s Park will provide junction mitigation on the local road network to mitigate its own impact and therefore there will never be a “Full” Gifford’s Park with no mitigation scenario. Tables 34/35 (Column S3-1) and Tables 50/51 (Column S5-1) should instead have been referred to and even then this is not a true reflection of the Gifford’s Park impact following the focused junction improvements which we have been developing and assessing and which the HSTS cannot hope to replicate .
- ii. Whilst CCC suggest comparing Development 5 and Development 3 as a proxy for a standalone Gifford’s Park scenario, this comparison does not provide a true reflection of the ‘baseline’ (i.e. without Gifford’s Park and without Gifford’s Park mitigation) compared with the ‘baseline + Gifford’s Park’ (i.e. with Gifford’s Park and with Gifford’s Park mitigation).
- iii. Even if a comparison of Development Scenario 3 and 5 is used as a ‘proxy’ for a standalone Gifford’s Park scenario, then Tables 34/35 (Column S3-1) and 50/51 (Column S5-1) show minimal variance at the key A1123 and A1096 junctions (to which CCC were referring you) operating beyond 100% RFC when comparing Development Scenario 3 (with Gifford’s Park) and Development Scenario 5 (without Gifford’s Park): see rows J-M and R-U and Columns S3-1 and S5-1 respectively of these tables. Furthermore, most of the junctions deemed to still be operating beyond 100% RFC are located on the A141, and will therefore be influenced by how developments within this area of Huntingdonshire are loaded onto the strategic model. Overall the variance in junction performance identified certainly does not advocate the need for strategic mitigation measures arising from the location of a strategic scale allocation at St Ives in general or at Gifford’s Park in particular. Instead, the comparison exercise identifies a number of junctions that would benefit from focused junction modelling assessments (to a level that simply cannot be undertaken by a strategic model) and focused junction mitigation improvements. This focused exercise has been undertaken by Peter Brett Associates and suitable junction works have in consequence been identified that demonstrate that adverse impacts may be mitigated and are not a constraint to development at Giffords Park.
- iv. Gifford’s Park is assumed in Development Scenario 3 on page 3 of the HSTS to be 2,200 dwellings with no account of its sustainable characteristics (now acknowledged in the Statement of Common Ground with CCC), which will result in internalisation of certain trips. This level of development is also substantially incorrect with Hallam’s scheme delivering 1,750 dwellings. This substantial overstatement - by 450 dwellings - may have had a marked impact on the assessment. HDC/CCC were advised of this error as far back as 2016, but have done nothing to address it.
- v. Whilst the strategic model is good for estimating journey times or identifying bottlenecks in the strategic road network, it is known for being incapable of accurately modelling the capacity of individual junctions and the benefits/dis-benefits of standalone junction mitigation. Indeed, the model does not use detailed junction geometry. It is therefore likely that the strategic model is not accurately modelling the benefits of standalone mitigation.

The consequence of the above is that we feel that you do not have a sound evidence base before you in relation to a key outstanding question for Matter 8: are there any in principle highways objections to delivering a strategic scale allocation at St Ives (and in particular at Gifford’s Park), which would be commensurate with its status in the Huntingdonshire LP hierarchy? Accordingly, we feel that we have no alternative now but to take our highways assessment forward to the level of a TA and we look forward to the cooperation of CCC in undertaking that work in a timely fashion, so as to inform your Examination. This work will have the advantage of assessing the correct quantum of development proposed (up to 1750 units) and will utilise actual and proposed junction geometry in contrast to the materials currently before you.

Finally, on a more detailed point, the CCC suggested that there was no scope for improved cycle / pedestrian provision along Harrison’s Way, given works to implement the Morrison’s supermarket development. As can be seen from the accompanying drawing (ref: 31874-5501-001) that is not the case. We can confirm that there is still ample highway land available along the Morrison’s site boundary. The only change Morrison’s

development has made to the boundary are as follows, all of which have no impact on the width available to construct a footway/cycleway as shown on the accompanying drawing (ref: 31874-5501-001):

- A slight difference in vertical levels
- A new footway linking from the Morrison's Site onto the existing footway located adjacent to the A1123/A1096 roundabout
- Earthworks to improve an existing ditch that runs along the back edge of the highway boundary but away from where a new footway/cycle is to be proposed as part of the Gifford's Park Package of sustainable measures.

The vertical difference and slope leading down to the Morrison's site boundary may require an engineered retaining feature for a short section to replace the existing slope in places. The boundary of the Morrison's Site has remained in the same location and therefore the required width is still available to provide a footway/cycleway. We therefore do not agree that a footway/cycleway has become undeliverable.

Yours sincerely,



Mark Hyde, MRTPI, PIEMA
Partner

E: [REDACTED]
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M: [REDACTED]

Encs:

- Enclosure 1 - O&S Panel Report 8th March 2016
- Enclosure 2 - Letter to HDC 4th March 2016
- Enclosure 3 - Letter to HDC 3rd May 2017
- Enclosure 4 - HDC & CCC Pre-application advice 11th January 2017
- Enclosure 5 - ES Scoping Report May 2018
- Enclosure 6 - HDC Scoping Opinion 15th June 2018
- Enclosure 7 - Drawing ref 31874-5501-001

HUNTINGDONSHIRE DISTRICT COUNCIL

Title/Subject Matter: **HUNTINGDONSHIRE LOCAL PLAN TO 2036
QUARTERLY UPDATE**

Meeting/Date: Overview and Scrutiny Panel (Economy and Growth) –
8th March 2016
Cabinet – 17th March 2016

Executive Portfolio: Strategic Planning and Housing

Report by: Head of Development

Ward(s) affected: All

Executive Summary:

At the Cabinet meeting on 19th November 2015 it was resolved that quarterly updates should be provided on progress on the Local Plan to 2036. This report provides details of the anticipated timetable for the proposed submission Local Plan (December 2016) and progress on preparation of the evidence base necessary to support this. In particular, it reflects progress on the Strategic Transport Study being jointly commissioned with Cambridgeshire County Council and the Strategic Flood Risk Assessment. It also highlights the need for the budgets to support the Local Plan to be able to respond flexibly to dependencies on other organisations' work programming.

Recommendation(s):

That the Overview and Scrutiny Panel (Economy and Growth):

- 1) Notes progress on preparation of the Huntingdonshire Local Plan to 2036 and its supporting evidence base
- 2) Comments on the proposal to set up a single Planning Policy earmarked reserve as set out in paragraph 4.1 of the report.

That the Cabinet:

- 1) Notes progress on preparation of the Huntingdonshire Local Plan to 2036 and its supporting evidence base
- 2) Agrees to set up a single Planning Policy earmarked reserve as set out in paragraph 4.1 of the report.

1. WHAT IS THIS REPORT ABOUT/PURPOSE?

1.1 This report provides an update on progress on preparation of the Huntingdonshire Local Plan to 2036 (HLP2036) and its supporting evidence base in the light of recent government announcements relating to the timescale for the production of local plans.

1.2 The purpose of the report is to:

- Confirm the current position with preparation of the HLP2036
- Detail progress made in the last quarter on preparation of the evidence base to support the proposed submission HLP2036
- Recommend a way forward for budgetary provision for the necessary evidence base

2. WHY IS THIS REPORT NECESSARY/BACKGROUND

2.1 The government has announced that it expects new local plans 'to be written' by early 2017 although there has been no clarification of what statutory stage of preparation this means. The next stage of the preparation process for the HLP2036 will be the proposed submission stage which is the first statutory stage; this involves a set 6 week public consultation period under Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012, specifically inviting representations on issues of soundness and legal compliance.

2.2 At the Cabinet meeting on 19th November 2015 it was resolved that quarterly reports on progress with preparation of the HLP2036 should be provided.

3. PROGRESS WITH PREPARATION OF THE HLP2036 AND ITS SUPPORTING EVIDENCE BASE

Local Development Scheme

3.1 A revised Local Development Scheme has been prepared setting out the intended timetable for production of the HLP2036 which is presented as a separate item on this agenda. This reflects the anticipated timetable for preparation of the key elements of the necessary evidence base, its incorporation into the HLP2036 and sustainability appraisal and the need for Appropriate Assessment of the draft proposed submission document under the EU Directive on Habitats Regulations Assessments.

3.2 The target set within the Local Development Scheme is for the proposed submission HLP2036 and its supporting documents to be reported to Cabinet in December 2016 seeking agreement to publish them for statutory consultation under Regulation 19 starting in January 2017.

Strategic Transport Study

3.3 The highest priority in the last quarter has been accorded to preparing a brief for a Strategic Transport Study in partnership with Cambridgeshire County Council. This was completed on 12th February 2016 and is now in the hands of Cambridgeshire County Council's procurement team. The intention is to work through the procurement processes from 11th April 2016 and award the contract in the week beginning 3rd May 2016. This will allow some time for the appointed consultants to start preparatory work before the revalidated

Cambridge Sub-Regional Model (CSRM) traffic model is made available to them in early June.

- 3.4 Revalidation work of the CSRM is currently being carried out for Cambridgeshire County Council by Atkins. This is necessary to ensure that the model holds the most up-to-date data on traffic demand, is updated with all recently completed transport infrastructure schemes, potential transport infrastructure changes that have been modelled but not implemented are removed and the public transport, walking and cycling assignments are correct. Due to the volume and complexity of data in the model the revalidation work cannot be completed until the end of May 2016. Working in partnership with Cambridgeshire County Council on this project, and awaiting the completion of the revalidation work before the substantive part of the Strategic Transport Study begins, ensures that the Study is based on the most up to date and robust information available. Awaiting the completion of the County Council's revalidation work also significantly reduces the cost compared to commissioning separate revalidation work.
- 3.5 The main purposes of the Strategic Transport Study are to:
- Identify and test the transport implications of committed development and four potential development scenarios;
 - Recommend the most sustainable development scenario in transport terms for delivering the 21,000+ homes required;
 - Highlight where there are opportunities for increasing the usage of sustainable transport modes;
 - Identify and cost where amended or additional transport infrastructure is required to mitigate the predicted impacts of each potential development scenario;
 - Form the basis of a district-wide transport strategy that mitigates the transport implications of the chosen development scenario
- 3.6 On 19 November 2015 Cabinet resolved that 'as a priority, infrastructure requirements for Wyton Airfield are further scoped with a view they can be identified and fully costed'. To facilitate this four potential development scenarios have been prepared for testing. A core set of completions, commitments and potential allocations has been included in all four potential development scenarios as these are expected to be delivered as they accord well with local and national planning policies. This core set totals 17,369 dwellings. Each of the four scenarios includes this core set of potential allocations and then different combinations of additional potential development sites. The potential development scenarios are set out in Table 1 below. To reflect the Ministry of Defence's announcement on 18 January 2016 the potential redevelopment of RAF Alconbury with an additional 1,450 dwellings has been added to each scenario given its proximity to Alconbury Weald; however RAF Molesworth is not included as it is a free-standing site in a countryside location which will need further consideration over its potential suitability for redevelopment. Option 1 is closest to the growth scenario put forward in the Targeted Consultation Local Plan to 2036 in January 2015, updated to reflect recent proposals. Option 2 is designed to test a development scenario which excludes redevelopment of RAF Wyton altogether to minimise the impact on the A141. Option 3 considers slower growth at RAF Wyton to extend the period available for introduction of traffic mitigation measures. Option 4 is intended to test the impacts of a high growth scenario to ascertain whether a major improvement scheme to the A141 could be deliverable.

3.7 It should be stressed that these scenarios have been developed to test impacts of growth and should not be taken as any indication that the sites will be included in the next version of the Local Plan.

Table 1: Potential development scenarios

Option No.	Description	Total no. of dwellings	Additional sites above the core of 17,369 additional dwellings
1	Full Wyton plus expected sites	24,969	<ul style="list-style-type: none"> • Wyton airfield – 4,500 dwellings, 10ha employment, 5,000m² retail, secondary school and 2-3 primary schools • Alconbury Weald intensification – 1,500 dwellings over the permitted 5,000 • RAF Alconbury redevelopment – 1,450 • West of Brampton – 150 dwellings
2	Without Wyton, minimising impact on A141	22,809	<ul style="list-style-type: none"> • Giffords Park, St Ives – 2,100 dwellings plus supermarket • Riversfield, Little Paxton – 240 dwellings • West of Brampton – 150 dwellings • Alconbury Weald intensification – 1,500 dwellings over the permitted 5,000 • RAF Alconbury redevelopment – 1,450 dwellings
3	Delayed Wyton plus expected sites	23,347	<ul style="list-style-type: none"> • Wyton airfield – 2,880 dwellings, 5ha employment, secondary school and 2 primary schools • Alconbury Weald intensification – 1,500 dwellings over the permitted 5,000 • RAF Alconbury redevelopment – 1,450 dwellings • West of Brampton – 150 dwellings
4	A141 upgrade support	32,412	<ul style="list-style-type: none"> • Wyton airfield – 4,500, 10ha employment, 5,000m² retail, secondary school and 2-3 primary schools • Ermine Street, Huntingdon – 1,440 dwellings, 1 primary school • Sapley Park Farm, Huntingdon – 1,243 • Lodge Farm, Huntingdon – 3,570 dwellings, 15ha employment • Alconbury Weald intensification – 1,500 dwellings over the permitted 5,000 • RAF Alconbury redevelopment – 1,450 dwellings • North of Wyton airfield – 1,340 dwellings

- 3.8 To facilitate progress with determining the most sustainable and deliverable development strategy for the HLP2036 the brief specifies that draft analysis and recommendations from each potential development scenario be reported as soon as it is completed. The brief for the Study requires identification of the transport related infrastructure package for each development scenario along with anticipated indicative costs. Delivery of the Study is dependent upon release of the revalidated CSRM traffic model to the consultants; if this is delayed the anticipated completion date of late August may be compromised.

Strategic Flood Risk Assessment

- 3.9 The Strategic Flood Risk Assessment (SFRA) comprises two separate elements: the Level 1 SFRA which will identify flood risks across the whole district defining and mapping flood zones and the Level 2 SFRA which will provide more detailed analysis of sites under consideration as development allocations in the HLP2036 which may be at an increased risk of flooding.
- 3.10 The main purposes of the SFRA are to:
- inform policy formulation and site selection for the HLP2036 and aid the sustainability appraisal process;
 - facilitate the submission of planning applications that are accompanied by sufficient relevant information;
 - facilitate the determination of planning applications;
 - be a useful resource to inform the Council's emergency planning functions
- 3.11 Following appointment of JBA Consulting, work on the SFRA Level 1 commenced on 30 November 2015 and is scheduled for receipt by the Council in late April 2016; this is later than originally scheduled due to delays in provision of extensive datasets by the Environment Agency. The Level 2 SFRA is informed by the outcomes of the Level 1 Assessment so cannot start until that is completed. Completion of the Level 2 SFRA is now anticipated in July 2016, again subject to availability of Environment Agency inputs.

Gypsy and Traveller Needs Assessment

- 3.12 A replacement Gypsy and Traveller Needs Assessment (GTANA) is being coordinated by the Joint Strategic Planning Unit on behalf of Huntingdonshire District Council in partnership with South Cambridgeshire, East Cambridgeshire and Forest Heath District Councils, St Edmundsbury and Kings Lynn & West Norfolk Borough Councils and Cambridge and Peterborough City Councils. The main purposes of the GTANA are to:
- Inform the development of future housing and planning policy for each respective authority
 - Provide information on gypsy, traveller and travelling showpeople's accommodation needs both temporary and permanent, including 'bricks and mortar' accommodation
 - Gain a better understanding of the pattern of movements and encampments in and between the Councils' administrative areas
 - Translate these accommodation needs into five year increments covering the period 2016 to 2036
- 3.13 Work on the GTANA started in November 2015. Face to face surveys were conducted with members of the gypsy, traveller and travelling showpeople communities where agreement could be gained during November and December 2015. Engagement with other stakeholders, including this Council

and Luminus, as managers of the St Neots caravan park, has taken place during January and February 2016. A final report is expected to be available in early April.

Other Evidence and Research

- 3.14 Research is being undertaken into older people's housing needs led by Planning Policy working with colleagues in Strategic Housing and in the Social Care team at Cambridgeshire County Council. This is in response to significant concerns over lack of suitable accommodation for older people needing additional support or wishing to downsize within their community to retain existing social networks which have been raised by local residents and Town and Parish Councils during previous phases of engagement. This is targeted for completion by the end of May.
- 3.15 Detailed checking of all draft policies and allocations is ongoing to ensure compliance against the National Planning Policy Framework/National Planning Practice Guidance to minimise the potential of lack of conformity issues when the HLP2036 is being examined. A brief has been drafted for a Retail and Commercial Leisure Needs Assessment which will be issued for tender subject to availability of the necessary budget. The Sustainability Appraisal (SA) is being reformatted to aid ease of understanding. This is a detailed, iterative assessment that is required to be completed at each stage of preparation of the HLP2036; the outcomes of the SA are required to be incorporated into the HLP2036 before it is published for proposed submission consultation.

4 FINANCIAL IMPLICATIONS OF PROVIDING THE EVIDENCE BASE

- 4.1 Currently, the budgets for consultants and related costs to support the HLP2036 and other Planning Policy initiatives are agreed for each financial year. Dependencies on others e.g. the County Council for transport modelling, means that timescales can be outside the District Council's control and budgets are not therefore spent as planned. Rather than continue with the status quo, it is proposed that a single Planning Policy earmarked reserve is set up, with money then drawn from the reserve to support the work programme. The 2015/16 budget of £362K for Local Plan Preparation, Wyton Airfield Development, Alconbury Development Proposals, Hunts Town Centre Redevelopment and St Neots Town Centre Advice and future years' budgets for Local Plan preparation, Wyton Airfield and St Neots Town Centre Advice would be put into this reserve. The estimated cost of progressing the current draft HLP2036 to submission is some £330K-£430K.

5. COMMENTS OF OVERVIEW & SCRUTINY PANEL

- 5.1 This report is being considered at the Overview and Scrutiny Panel (Economy and Growth) on the 8th March.

6. KEY IMPACTS/RISKS? HOW WILL THEY BE ADDRESSED?

- 6.1 A key risk is that critical elements of the evidence base may not be completed to the timetable anticipated due to factors outside of this Council's control. This will delay finalisation of the development strategy and potential allocations required to deliver it, preventing completion of the proposed submission HLP2036 and its supporting documents by December 2016. This will be managed by ongoing liaison with consultants and other partners

involved in preparation of evidence base documents to reaffirm expected commitments. Loss of expertise within the Planning Policy team could give rise to delays if it impacted on preparation of specialist documents such as the Sustainability Appraisal. A further risk arises from potential budget limitations on preparing the evidence base, particularly if a change in government policy requires additional evidence that is not currently identified. This could be best addressed by provision of a single Planning Policy earmarked reserve to draw down against.

- 6.2 The revised LDS envisages the submission of the new Local Plan in July 2017. It remains unclear whether the adoption of the Core Strategy in 2009 already means that the District Council has met the requirement announced by Government in July 2015 to have written a Local Plan by early 2017. The Government has still not made clear exactly what is required to meet this requirement. If the adoption of the Core Strategy does not mean that the requirement has already been met, and the requirement is for the new Local Plan to have been submitted by March 2017, the LDS timeline means that the District Council will not have met the requirement to write a plan by early 2017. The penalty for not having written a plan is that the Government will intervene and write a plan. As the LDS envisages having carried out statutory consultation on the Proposed Submission version of the plan, Government intervention to write a plan seems most unlikely.

7. LINK TO THE CORPORATE PLAN

- 7.1 The production of the HLP2036 relates to the Corporate Priority of Enabling Sustainable Growth.

- 7.2 The objective under the Corporate Priority is as follows:

“To improve the supply of new and affordable housing to meet future needs: Our work programme includes, ensuring an adequate supply of housing to meet objectively assessed needs and planning and delivering the provision of decent market and affordable housing for current and future needs.”

- 7.3 The relevant key actions for 2015/16 related to the objective are:

- Implement a programme to adopt the Local Plan to 2036
- Facilitate delivery of new housing on the large strategic sites at Alconbury, St Neots, Wyton, Bearscroft - Godmanchester

8. LEGAL IMPLICATIONS

- 8.1 Advice has been sought and will continue to be sought as necessary throughout the preparation of the HLP2036.

9. RESOURCE IMPLICATIONS

- 9.1 As set out in paragraph 4.1 above it is proposed that a single Planning Policy earmarked reserve is set up enabling money to be drawn down from this to support the HLP2036 work programme.

10 REASONS FOR THE RECOMMENDED DECISIONS

- 10.1 To ensure that Members are updated on preparation of the HLP2036 and its associated evidence base and to provide for expenditure on studies which are required to support the delivery of the proposed submission HLP2036 document.

BACKGROUND PAPERS

Report to Cabinet 19th November 2015 – Huntingdonshire Local Plan to 2036

Local Plans: House of Commons: Written Statement Department for Communities and Local Government Written Statement made by Minister of State for Housing and Planning (Brandon Lewis), July 2015

Letter from the Right Honourable Greg Clark MP (Secretary of State for Communities and Local Government) to the Chief Executive of the Planning Inspectorate, July 2015

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Andy Moffat
Head of Development
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BY EMAIL

04 March 2016

Dear Mr Moffat,

HUNTINGDONSHIRE LOCAL PLAN - GIFFORD'S PARK, ST IVES

I write with reference to the emerging Local Plan and discussions with your officers in relation to the above site.

You will be aware that we prepared a Vision Document for the site that was submitted to the Council in March of last year. We have subsequently met with officers from your Local Plan and Transport Teams to update them on work that we have been undertaking to demonstrate the suitability and deliverability of Gifford's Park to be included as an allocation in the emerging Local Plan. We have a further meeting programmed with your officers for the 16th March and accompanying this letter you will find an update to the Vision Document that we hope to discuss with them. Printed copies will be sent in the post.

However, we have also noted the report to the Council's Overview & Scrutiny (Economy & Growth) Panel Meeting of the 8th March in which proposed development scenarios are set out for the purposes of the Strategic Transport Study that the Council and Cambridgeshire County Council will shortly be commissioning. We are concerned to note that Gifford's Park only appears to be an option in Scenario 2 in which it is assumed that the Wyton Airfield development will not come forward at all within the plan period.

We understand that the number of scenarios needs to be limited to avoid excessive costs when running the model; however we feel there needs to be a scenario which includes for both Wyton Airfield and Gifford's Park to allow for a robust assessment. We would also note that the assumed quantum of development at Gifford's Park differs from our own assumptions on delivery from the site, which is based on technical work that we have undertaken to assess deliverability.

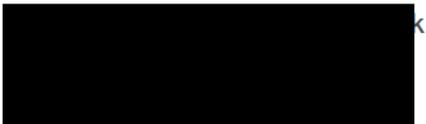
I should be grateful if you would note our concerns and draw them to the attention of your Members before any final decisions are taken about the development scenarios which are to be the subject of modelling. We will wish to discuss these matters when we meet on the 16th.

In the meantime, should you have any queries, please do not hesitate to contact me.

Yours sincerely,



Mark Hyde MRTPI, AIEMA
Partner



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James Campbell – Planning Policy Team
Stuart Bell – Transport Team Leader

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BY EMAIL

3rd May 2017

Dear Mr Moffat,

HUNTINGDONSHIRE LOCAL PLAN - GIFFORD'S PARK, ST IVES

I write with reference to the emerging Local Plan and in relation to the above site. My client and I met with James Campbell of the Local Plan Team on the 20th April and were disappointed to learn that Gifford's park was not being considered favourably by the Council as a proposed allocation in the Submission Draft Local Plan due to be finalised in June, despite the decision to drop RAF Wyton as an allocation and now uncertainty about USAF requirements at RAF Alconbury.

James advised that there were two principal factors behind the decision not to promote Gifford's Park as a proposed allocation, these were impacts on the highway network and secondary education.

Highways

You will be aware that following submissions the site was assessed in the update of the Council's HELAA in September 2016. The site's SA assessment was concluded to be broadly positive but its suitability was judged to be uncertain in relation to traffic impacts on the local highways network. In light of the HELAA conclusions we have undertaken further technical studies and have completed a formal pre-application advice exercise with the Council in order to formally address technical issues arising, most notably matters pertaining to highways and drainage.

We understand that further highways modelling work was undertaken consequent upon the decision to remove RAF Wyton from further consideration and that this has concluded that the impacts of Gifford's Park were similarly unsustainable. This conclusion runs counter to our own work that has been shared with the LHA through the pre-application advice process. Our proposed Transport Strategy and initial manual assessments indicate that a nil-detriment solution is available.

Whilst we would acknowledge that further work needs to be undertaken in the context of the modelling outputs of the studies recently completed, we are surprised that so definitive a

conclusion has been reached at this stage. We consider that there is a viable and sustainable solution to the traffic impacts arising from Gifford's Park.

Secondary Education

We acknowledge that St Ivo School is constrained. However, the LEA advised as part of the pre-application process that it would regard a suitable financial contribution as an acceptable means of mitigating the impact of Gifford's Park. Notwithstanding, we acknowledge the concerns expressed by your officers, both in the formal pre-application advice letter and subsequently, at the potential implications at secondary education level of the proposed development. We are awaiting further advice from the LEA and will actively pursue this, but what should be acknowledged is that Gifford's Park is a substantial site that is quite clearly capable of offering suitable opportunities to acceptably mitigate impacts at secondary education level.

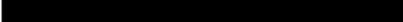
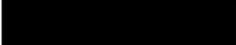
In conclusion, we are surprised and disappointed that the opportunity at Gifford's Park appears to have been so lightly dismissed. We note that you have refreshed your OAHN and that this has led to a reduced requirement over the plan period in the order of 1,000 dwellings. We also acknowledge that you have identified other potential allocation sites through the HELAA work, although I would already note that there is now some uncertainty over one of those, i.e. USAF Alconbury. However, RAF Wyton is a substantial site that your published housing trajectories has indicated would provide over 4,000 dwellings, commencing in the 5-10 year period. It seems highly unlikely to us that such a substantial 'hole' in the trajectory can be robustly overcome in the absence of the allocation of further strategic scale sites, including Gifford's Park.

We appreciate that the Council is on a tight timetable to publish the new Local Plan. However, we would ask that we are urgently given sight of the modelling work that has been used as the basis for concluding that Gifford's Park is unacceptable on highways impact grounds. We should be grateful for an urgent response.

Yours sincerely,



Mark Hyde MRTPI, PIEMA
Partner

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Carter Jonas FAO Mr M Hyde
6-8 Hills Road
Cambridge
CB2 1NH

Our Ref: 16/70169/PENQ
Your Ref:

11th January 2017

Dear Mr Hyde

Proposal: **Mixed use development - 1700 dwellings, care home (C2),
Employment (B1c) and (B8), primary school, hotel, supermarket,
health care, neighbourhood centre, relocation site for SIFC, green
infrastructure.**

Site address: **Land at Giffords Farm, OS 3466 and 3248, Somersham Road, St Ives**

Applicant: **Mr T Thornehill Hallam Land Management**

Thank you for your preliminary enquiry received on 10th October 2016 and described above.

Your enquiry relates to land to the east of St Ives that covers approx. 126ha, which you propose to develop as a mixed use residential led development that would extend the settlement eastwards into the countryside. Your proposals are outlined on the submitted Masterplan and Parameter Plan, and include retail and employment uses, open space, land to accommodate the relocation of St Ives Town Football Club and two vehicle accesses from the highway.

The Council's planning constraints system shows the land to be agricultural; in Grades 2 and 3. The submitted 'Soils and agricultural use & quality of land' classifies approx. 69 hectares of the land as subgrade 3a soil and approx. 49 hectares as subgrade 3b soil.

Parts of the land are shown by the Environment Agency's Flood Zone Map to be within Flood Zone 2 and Flood Zone 3, and the Council's 2010 SFRA shows likewise (please note: an update to the SFRA is anticipated this year).

You have submitted the following documents in support of your enquiry:

- masterplan
- parameter plan
- soil report
- ground condition assessment
- flood and drainage technical note (including infiltration analysis)
- ecological summary

- heritage assessment of aerial photography (archaeology)
- draft transport assessment.

We held two meetings at the District Council Offices to discuss elements of the proposals.

- The first: a joint meeting with Officers from the District and County Councils to discuss highway and drainage issues.
- The second: a meeting with District Council Officers to discuss how matters of landscape, urban design, green space and sports provision may influence the master planning of the development.

You are also seeking advice direct from the County Council on the issues within its remit, such as highways, drainage and education.

The following are the key planning policies in relation to your enquiry (subject to change as the Draft Local Plan progresses).

- Huntingdonshire Local Plan (1995): H23, H31, H38, E1, E8, S2, S6, S14, T18, T19, T21, R1, R2, R3, R7, R8, R12, R13, En12, En13, En14, En17, En18, En20, En22, En23, En25, En27, CS5, CS6, CS8 and CS9.
- Huntingdonshire Local Plan Alterations (2002): HL5, HL6, HL10 and OB2.
- Huntingdonshire Local Development Framework Core Strategy (2009): CS1, CS2, CS3, CS4, CS7, CS8, CS9, CS10
- Huntingdonshire Draft Local Plan to 2036: Stage 3 (2013): LP1, LP2, LP6, LP8, LP11, LP13, LP14, LP15, LP17, LP21, LP25, LP26, LP28, LP30, LP31.
- Draft policy SI3 proposes to allocate 5ha of land at Giffords Farm for employment.

The Council considered the enquiry land in its Environmental Capacity Study: Additional site assessments consultation that ran from 8th November to 6th December 2013. This concluded that the area is considered to offer limited capacity for development with the exception of employment uses.

The Council has appraised the sustainability of the enquiry land in the 2016 Housing and Economic Land Availability Assessment: Additional Sites Consultation 2016 as part of the preparation of the emerging Local Plan to 2036. The outcome of the appraisal is summarised as follows: Overall the appraisal is broadly positive, due mainly to the likelihood of a site of this size including open space and other facilities, but there are a number of shortcomings. Flood risk is a significant constraint for parts of the site. About a third of the site is classed as grade 2 agricultural land. Transport infrastructure is expected to be a significant constraint.

Relevant planning history:

Planning permissions have been granted on the land for (i) the erection of a clubhouse and construction of car park in association with football club ref. 1300354OUT and (ii) football pitches, erection of flood lights and re-profiling of land ref. 1300553FUL. Records also show that the County Council granted planning permission to use land at Giffords Farm as a Waste Transfer Station.

Comments on Proposal:

Feedback covering the main planning issues has been provided at the two pre-application meetings and this written reply, in setting out the views of planning officers on your proposal, has had regard to those discussions, has considered relevant planning guidance and policies, site history and other planning considerations and has taken account of the input of planning managers.

The main issues in relation to your enquiry are considered to be:

- principle of development
- impact on transportation network
- infrastructure requirements
- flood risk
- visual impact

Principle:

Your proposal conflicts with the development plan in that it proposes a residential led mixed use development on unallocated land that is located outside the built up area of St Ives and in the countryside and for which there is no suggested essential need. It conflicts with policies H23 and En17 of the Local Plan 1995 and policy CS3 of the Core Strategy 2009, which control the scale and location of development within the District in order to promote sustainable patterns of development. Furthermore, your proposal is not allocated in the Draft Local Plan to 2036, and policy CS2 of the Core Strategy does not define the land as a location for Strategic Housing Development within the St Ives Spatial Planning Area; the land is not depicted as a direction of growth in the Core Strategy's key spatial diagram.

The Inspector who presided over the examination of the Core Strategy 2008 wrote in his report (para. 3.44) that St Ives has *"less opportunity for growth other than to the west where it can link with existing allocations and commitments".....and ..."There are also flood risks constraints to the south and south east making land unsuitable for housing development, and land to the north and north-west is remote from the town centre"*.

The National Planning Policy Framework is relevant to your proposal but it does not change the status of the development plan and it recognises that a development proposal that accords with an up-to-date development plan should be approved (without delay) and a development proposal that conflicts with an up-to-date development plan should be refused unless other material considerations indicate otherwise.

One such material consideration is the housing land that would be supplied by your proposed development. You have not sought to argue that the Council does not have a 5 year supply of housing land. The Council can demonstrate a robust (tested at a recent appeal) 5 year supply of housing land and therefore its housing supply policies, which include policies H23 and En17 of the Local Plan 1995, and CS2 and CS3 of the Core Strategy 2009. Therefore these policies should be considered up-to-date in the context of paragraph 49 of the NPPF as the Council is meeting its objectively assessed housing needs, which are set out in the 2013 SHMA and have increased above those set out in the Core Strategy 2009. The Council's 2016 Annual Monitoring Review (AMR) has assessed the Council's land supply as 5.24 years.

The Council's ability to demonstrate a 5 year supply of housing land means that it is meeting the NPPF obligation to boost significantly the supply of housing and deliver a wide choice of high quality homes, as part of meeting the housing needs of its area. This means, in turn,

that your proposal and others in the District are currently denied access to be considered under the weighted planning balance in the fourth bullet point of paragraph 14 of the NPPF. Therefore the Council is not obliged to determine whether any adverse impacts of the development would significantly and demonstrably outweigh the benefits when assessed against the NPPF as a whole. The 'normal' planning balance under section 38 of the PCPA therefore prevails and the question to be addressed here is whether there are any material considerations that indicate that your proposal should be supported.

The Council's Local Plan is emerging and I am aware that you are seeking to have the land allocated in the Local Plan for a residential led mixed use development. As part of this process, the Council's transport modelling includes the proposed development in a specific development scenario that does not include the proposed draft allocation at RAF Wyton. The pre-application advice given in this letter therefore represents the District Council's current position on the proposed development on the date of writing.

In terms of the proposed retail, office and leisure developments, in addition to being located in the countryside, the proposed development site is located outside of the town centre and therefore in accordance with the NPPF paragraphs 24 and 26, the LPA will apply a sequential test to planning applications for these main town centre uses, and it will require an impact assessment of these uses on the town centre. Policy LP8 of the Draft Local Plan to 2036 sets out that an impact assessment will be required where more than 600 sqm. of retail floor space is proposed. The Emerging Retail and Commercial Leisure Needs Assessment advises the Council to retain 600 sqm. as the threshold for the impact assessment.

In terms of the proposed employment development, a 5 hectare area of the site is a proposed allocation for employment in the draft Local Plan to 2036 (allocation SI 3). The Council has evidence that the demand for flexible light industrial type accommodation to serve the St Ives area is not currently being met by the market and this justifies the policy provision of 5 hectares. The Development Guidance in the draft Local Plan remarks that the land covered by the proposed employment allocation may need to increase as informed by the employment land study for Huntingdonshire. On this basis your proposal to provide 2 hectares of employment land would not be satisfactory. The proportion of B8 floor space would also need to be carefully assessed in light of the employment land study.

Impact on the transportation network:

An assessment of the submitted draft Transport Assessment (TA) is a matter for the County Council as Local Highways Authority. Therefore the District Council has limited its comments on the submitted TA to matters of accuracy which are listed as follows and were covered at the first of the pre-application meetings:

- Section 3.3 - Cycle routes (and for pedestrians) and cycle parking locations should be shown on a plan.
- Section 3.3.4 – While the cycle parking locations listed are noted, the submission does not include the provision at Cattle Market car park adjacent to St. Ives Bus Station or any on-street provision within Market Hill.
- Section 3.4 – Train Services. While the stated journey times to Huntingdon Rail Station by various modes may be factually correct, should this not include a dialogue that walking and cycling is an unrealistic mode of travel for access to the rail network?

- Section 3.4.6 – Bus Services. As above, while the stated distances to the closest bus stops are factually correct, this represents an artificial picture as it is purely a distance from the site boundary and in that regard, does not present an accurate picture of 'the optimum distance category for walking to/from bus stops as recommended by CIHT', that being the development as a whole. This paragraph should be re-worded accordingly.
- Section 3.4.7 – As above, this is factually misleading.
- Section 3.4.9 – As above, this is factually misleading apart from re-routing potential.
- Section 3.6.8 – It is stated that a shared cycleway/footway is located on one side of Harrison Way for most of its length. This is factually incorrect as the length between Parsons Green and the A1123 has no provision, a distance of approx. 500m.
- Section 4.3/4.4 – Simply to endorse what CCC has indicated that there are no indications of linkage to external cycling/walking infrastructure will be achieved and improved. The graphics plan at 31874/5501/01 is required to be considered in greater detail and whether or not the routes indicated are actually achievable and deliverable.
- Section 5.3 – The residential to primary school and residential to secondary school mode share are stated as being sourced from a Cottenham Village College travel survey. Is this appropriate, particularly as Cottenham village will have a large rural catchment area, particularly for secondary education whereas Giffords Park would be located on the edge of a major market town? Would it not be more appropriate for mode share to be based on data for St. Ives primary and secondary schools?
- Section 9.1 – Off-Site Junction Improvements – while the early stages of this work are noted, the value of the proposed measures currently listed is of limited value without the full outputs of the transport modelling be known and it is this that will ultimately inform any off-site improvements required.

It is clear that the proposed development will generate significant transport movements and a full Transport Assessment is needed to determine whether the proposal will cause a severe residual cumulative impact on the highway network, which is the test in paragraph 32 of the NPPF. If you decide to submit a planning application, the Council will need to carefully assess any necessary transport mitigation measures and any knock on impact on the viability of the proposed development, and its ability to deliver planning obligations such as affordable housing

Infrastructure requirements:

The Council's Developer Contributions SPD 2011, which supplements policy CS10 of the Core Strategy 2009, provides that a development proposal for more than 200 homes will be required to meet its infrastructure needs (e.g. payments or land contributions) through a negotiated section 106 planning agreement in addition to payments to the Community Infrastructure Levy. Double counting will be avoided.

The SPD sets out the range of contributions that can be requested. Each and every request will need to meet the tests in the Community Infrastructure Levy regulations. The following obligations have been proposed through consultation with Officers in the Council, and there will be other obligations that are requested by organisations external to the Council. The

complete package of obligations will be considered in accordance with the SPD guidance and CIL regulations.

Open space: The Council's Green Spaces Officer and Sports Development Officer have each created a spreadsheet setting out the types and amounts of open space that would be required to be provided by this development and the contributions they would seek and for what purpose. I sent these details to you prior to the second meeting.

The Green Spaces Officer has made me aware that your land allowance for Green Infrastructure (67.3ha) includes sustainable drainage and structural landscaping. In accordance with paragraph 9 on page 17 of the Council's Design Guide SPD 2007, it is not acceptable for areas intended as open space to be comprised mainly or wholly of land which also doubles as a balancing area (which is likely to be unusable for at least part of the year); be occupied by dense planting as part of buffer zones; or be in accessible to disabled people. If you decide to apply for planning permission, you should demonstrate compliance with this guidance. The number and locations of LEAPs were discussed during the second pre-application meeting.

The Council's Sports Development Manager has supplied a spreadsheet setting out the contributions likely to be requested for indoor and outdoor sports provision. I sent these details to you prior to the second meeting. The following observations/comments are made with regard to the proposed outdoor sports provision.

- details securing community use of the three football pitches located in the north of the development (item 7 St Ives football club) and accessibility by residents in the local area and not just members of the club need to be provided.
- details of the surfaces of the pitches need to be provided.
- details of the form of changing provision and ancillary facilities need to be provided.
- the potential sports pitches (item 12 on the masterplan) looks very much like a cricket pitch according to the plans but does not seem to have any changing facilities or ancillary facilities located with the pitch. Clarification is required.
- calculations also show that 61,582 sqm. of formal outdoor space should be provided, which is the equivalent of 8 full size football pitches. The 3 football pitches and cricket pitch shown on the masterplan will fall below the policy amount in appendix 1 of the SPD for a development of this size. This needs to be justified through negotiation.

Affordable housing: will be sought at a proportion of 40% of the 1700 homes, subject to the site specific caveats in policy CS4 of the Core Strategy.

Wheeled Bins for Residential Development: The amount payable per residential unit is covered in the relevant contributions schedule that is available to view on the Council's website.

Education:

You propose to make provision on site for a Primary School and have been in discussion with the County Council regarding this, which is positive. Secondary School capacity is a matter for the County Council to advise and it has given advice to the effect that the situation requires further discussion, particularly in light of the proposed allocation of development at RAF Wyton and the proposed secondary school to be provided at Wyton. If it transpires, as appears likely, that the proposed development generates secondary pupil admission

numbers that cannot be accommodated at the St Ivo site, and pupils would have to be transported to other secondary schools outside of the town, this would not contribute to achieving sustainable development and would weigh against any benefits of the development.

Health:

Your proposed master plan shows a health centre. If you have not already done so, you should contact NHS England to determine its requirements in terms of land or a contribution.

Flood risk:

Parts of the site are shown by the Environment Agency flood zone map as at risk of flooding. The Local Planning Authority is required to apply the sequential approach in the NPPF to steer development away from land at risk of flooding and this takes primacy over the technical matter of determining whether development on land at risk of flooding is safe.

The submitted flood risk technical note shows that modelling of the flood extent has been undertaken and it says that no area of development would be within Flood Zone 2 or 3. If the Environment Agency concurs with this statement, I consider the sequential test to have been met. However, the emerging SFRA update may show different levels of risk and therefore you are advised to have regard to the SFRA update which is expected to be published later this year.

The technical detail in the submitted flood risk and drainage information is a matter for the County Council as Lead Local Flood Authority and Environment Agency.

Layout, scale and visual and landscape impacts:

The following comments were provided to you in advance of the second of the two pre-application meetings and are repeated here for the record:

- It would have been helpful to have had more information to show the design rationale behind the proposed Masterplan in terms of disposition/ quantum of proposed uses, e.g. diagrams underpinning the masterplan including the site opportunities and constraints, site appraisal diagram, and site concept etc. This may have answered some of the queries that are raised in the following paragraphs, albeit these matters can be picked up in the forthcoming meetings.
- We are pleased to see that the development is enclosed by strategic landscaping to the site edges of the site; however there appears to be a missed opportunity to provide wider green connections across the site from the edges of the site to the central open space, especially east west.
- The surface water management across the site has the opportunity to be managed carefully and presented as a number of interesting integrated design solutions, rather than just a series of engineered ponds as the masterplan appears to show. The potential attenuation ponds could be cleverly designed as SUDs features such as swales, wetland areas, permeable paving etc.
- It is noted that the development is served by two connections to the existing highway network and whilst the acceptability or other of the connections is a matter for the highways authority, I would have thought that an additional access point from the south would be beneficial.

- The masterplan layout appears to lack a clear identity in terms of having a Local Centre with a mix of uses within the central core. Such facilities would include a community uses, health centre, local shops, primary school and any support housing. There is an opportunity to arrange these in a feature square or indeed along a "High Street".
- The proposed area for employment adjacent to existing employment is logical. Alternatively it could be located on parcel A4 and accessed by car from Somersham Road, subject to other layout considerations,
- The layout has been broken down into development blocks which appear connected and providing a walkable neighbourhood. Travel distances to proposed play areas and site facilities should be plotted to help inform the best location of such facilities on site.
- Sports facilities are likely to require changing facilities, and there is an opportunity for such facilities to double up as a community hall if deigned from the outset.
- Allotments could be more accessible to residents if split and located in two different areas.
- It is questioned whether the Hotel would be better located fronting the A1123.

During the meeting the above comments were discussed in turn and you explained the rationale underpinning the masterplan was explained. Officers appreciate the complexities that are inherent to the master planning of a development of this scale. During the meeting there was much discussion about the respective locations of the non residential elements of the proposed development and this was arguably the main issue with the masterplan. The submitted masterplan shows the primary school, hotel, food store, neighbour centre, health centre and sheltered housing as dispersed elements. The dispersal of these elements is a weakness of the masterplan and is contrary to good place making principles. These elements should ideally be concentrated in a strong core to encourage walking to and between them and to create a focal point that adds legibility and a sense of place to the development, which as a whole is detached from the town due to its location beyond the industrial area. A stronger and more legible and walkable community 'core' could be achieved by arranging these elements in something akin to a 'Square' or 'High Street'. You commented that potential food store and hotel operators are likely to require visibility of their premises from the A1123 access, which may prevent those elements from being located more centrally in the site. All the same, it would appear logical for the other non residential elements to be arranged in a defined core of the development. If you decide to proceed with a planning application, I suggest we keep working together to achieve a satisfactory masterplan, supported by a DAS that illustrates how the masterplan could be realised in a satisfactory manner.

In terms of the wider landscape impacts of the proposed development, the following comments were provided to you in advance of the second of the two pre-application meetings and were discussed in turn during the meeting.

- Officers concur with assessments made in LVA paras 4.36, 4.46, and 4.68. The main views into the site from nearby locations are from the north west, north and north east – usually from roads.
- in LVA para 5.3 please clarify what is meant by a "greenway?" and please show the scale of these proposed features by way of a dimensioned cross section.

- LVA para 5.3 (6th bullet point) more detail is required of the proposed links “beyond.” This is important because [as the LVA notes elsewhere] there are few PROWs within and close to the site. Improving this network would be a positive step for the eastern fringe of St Ives and its wider right of way network.
- LVA para 5.6 more detail on the timing of structural planting is required and para 7.10 talks of advance structural planting but para 5.6 is less precise, talking of ‘key areas’ done when all construction phases are completed, which obviously could be many years after construction started. More detail of where these ‘key areas’ might be is needed, plus an agreement that they should be planted in phase 1.
- Landscape Effects: LVA para 6.8. It is believed that the Landscape Effects at year 0 and year 10 are underestimated slightly, especially as the overall scheme might well take over 10 years to complete. The visual effects detailed in para 6.10 and summarised in 7.12 onwards are agreed. Effects on residential amenity can only be determined once more detail is known.
- the Ecological Summary [FPCR September 2016] appears generally acceptable, albeit an expert view on this would be sought from the Wildlife Trust. It is queried why at para 4.0 and in the LVA [para 5.3] the creation of “large areas of new woodland” seems to be seen as something separate to ecological enhancement and habitat creation.
- The many possible attenuation areas will obviously be a feature of the site and on the scale shown here will be an important part of the local landscape character. It is vital that the majority of these areas are designed to be attractive areas both from a landscape and biodiversity point of view, rather just engineered features with little public amenity. Public access should be encouraged and designed in from the outset.

Officers find the submitted LVA to be satisfactory. It is generally accurate in its assessments of the landscape and visual baseline, and the effects associated with this proposal, though naturally the proposals and effects are somewhat broad brush at this early stage.

Other matters:

The Environmental Health Officer has reviewed the submitted “Phase 1 Ground Conditions Assessment (Desk Study)” written by Peter Brett Associates (report reference 31874/3501, Rev: 1, dated June 2016). The report identifies some “hot-spot” areas that would require further investigations with a risk assessment. The standard land contamination condition would be required with any planning consent (unless submitted beforehand). It would be useful for the risk assessor to have knowledge of the proposed development to refine the site conceptual model.

The submitted soil report classifies approx. 69 hectares of the site as Best and Most Versatile (BMV) agricultural land. Natural England is a statutory consultee for development proposals not for agricultural purposes that result in the loss of not less than 20 hectares of BMV land. NPPF para. 112 requires local planning authorities to take account of the economic and other benefits of BMV land. The Council acknowledges that the District as a whole has a relatively high proportion of BMV land and in having regard to the NPPF it would need to weigh the loss of such land in the planning balance when determining the sustainability of a proposal.

The suitability of the submitted desk based assessment of archaeology is a matter for the County Council to determine.

Consultees:

In responding to your pre-application enquiry, the views of the following specialist officers within the Council have been included:

- Environmental Health Officer (limited to assessing the Ground Conditions Assessment).
- Green Spaces Officers.
- Landscape Officers.
- Planning Policy Officers.
- Urban Design Officer.

If and when a planning application is received, I would expect the following to be key consultees within the Council whose views on the proposal will be important:

- Environmental Health Officers.
- Green Spaces Officers.
- Landscape Officers.
- Planning Policy Officers.
- Urban Design Officer.
- Housing Officers.
- Community Team.

Conclusion:

We welcomed the opportunity to give feedback on your proposal. As you are aware and do not dispute, the proposal is contrary to the Council's development plan and planning law is clear that permission should not be granted unless any material considerations justify a decision other than in accordance with the development. While there are positive attributes of the proposed development and the Council's sustainability appraisal was "*broadly positive*" about the land, there are a number of harms that the development is likely to cause and, at this stage, there is uncertainty over how these harms could be mitigated and what impact any mitigation measures would have on the viability of the development. The most significant of which appear to be the uncertain impacts on the highway network and uncertainty over how the demand placed by the development on secondary education provision would be met.

As it stands, the full range of effects likely to result from the proposed development are not known and when considered against the fact that the Council is meeting its housing needs (it can demonstrate a five year supply of housing land), there are, as I see it, no compelling material considerations that would convince me to support a planning application for the proposed development at this time. Your best option in my view is to continue pursuing the allocation of the land through the Local Plan process.

I would stress that the views stated in this letter are an expression of officer opinion only and have been prepared in accordance with the Procedures for Pre-Application Advice set out on the Planning pages on the Council's website www.huntsdc.gov.uk. They are made without prejudice to the determination of any subsequent application for planning permission. The advice provided is correct at the time of writing. Changes in circumstances on the ground, planning decisions and/or changes in planning policy after the writing of this letter may have an impact on the acceptability of the proposal.

If you would like a translation of this document, a large text version or an audio version, please contact us on 01480 388388 and we will try to accommodate your needs.

I hope the above is of assistance. The comments contained within this letter are made without prejudice to the eventual determination of any planning application that may be submitted. If you would like to discuss the matter further please contact me on 01480 387070.

Yours faithfully


Gavin Sylvester
Senior Development Management Officer (Strategic Developments)

Informative note on the Community Infrastructure Levy

Huntingdonshire District Council's Community Infrastructure Levy (CIL) Charging Schedule came into effect on the 1st May 2012. Huntingdonshire District Council is obliged to collect the CIL Levy from liable parties once development commences which received planning permission on or after the 1st May 2012. For more detailed information on CIL, the developments the charges will apply to, how much the charge will be and the process involved, the Community Infrastructure Levy pages on the Council's website www.huntingdonshire.gov.uk should be referred to. Development proposals which create less than 100 square metres of internal floorspace will be exempt from the CIL and will not be charged. However development which creates one or more new dwellings will be charged the CIL irrespective of the floorspace created.



PRE-PLANNING APPLICATION ADVICE

Giffords Park, St Ives

WITHOUT PREJUDICE

1. Background and Policy

- 1.1 Cambridgeshire County Council has been asked to provide an initial comments on a proposed residential development of 1,700 dwellings at Giffords Park, St Ives.
- 1.2 The documents shared for review were...
 - Illustrative Masterplan and associated Parameter Plan drawings;
 - Desk Based Archaeological Assessment & Heritage Assessment of Aerial Photography;
 - Ecological Summary Report;
 - Flood Risk & Drainage Technical Note;
 - Transport Scoping Note and draft Transport Assessment;
 - Landscape & Visual Appraisal;
 - Ground Conditions Report and Infiltration Assessment;
 - Soils & Agriculture Report.
- 1.3 The County Council has reviewed the above to advise on matters relating to transport and highways, archaeology, floods and water, ecology and biodiversity, education, strategic waste, libraries and lifelong learning.
- 1.4 This advice includes a broad indication of potential developer contributions or provision in kind to meet County Council requirements. Further dialogue with County services will be required to confirm exact requirements as part of the planning application consultation process. ***It is highlighted that costs set out below may differ from final costs as more information becomes available about the development. The advice is also based on the levels of service capacity at the date of the advice and it should be noted that this may also be liable to change over time.***
- 1.5 Other organisations, such as district and parish council's, or adopting sustainable drainage authorities, may have additional requirements.

2. Highways and Transport

Background

- 2.1 The document reviewed is the Transport and Highways Scope/Draft Transport Assessment dated September 2016 to accompany an outline planning application for a residential led mixed use development at Gifford's Park, St. Ives.
- 2.2 The remainder of this note sets out the comments of Cambridgeshire County Council (CCC) on the Transport and Highways Scope/Draft Transport Assessment.

CHAPTER 2: POLICY AND GUIDANCE

- 2.3 Comment: This section of the TA will need to consider the Counties Transport Investment plan which supersedes the St Ives Transport Strategy.

CHAPTER 3: EXISTING CONDITIONS

Section 3.3: Existing Pedestrian and Cycle Facilities

- 2.4 Comment: This section should follow the hierarchy of modes and deal with pedestrians first.

Cyclists

- 2.5 Comment: The TA needs to show the location of the existing cycle ways on a plan in relation to the proposed development site and needs to set out the nature of the paths i.e. are they mainly leisure or do they have to potential to encourage cycling for regular journeys?
- 2.6 The TA also needs to set out how the destinations served by the existing cycle ways compare to the work destinations of the existing population of the local census ward and also what percentage of journey are currently made by cycle.
- 2.7 This section of the TA needs to include an audit of the condition of the routes to the key local facilities in the area and highlight any missing links.

Pedestrians 2

- 2.8 Comment: This section of the TA needs to set out the details of the conditions of the existing pedestrian infrastructure and also needs to include a full audit of the routes to key local facilities highlighting any missing links or barriers that might discourage walking to and from the proposed development site.
- 2.9 The TA also needs to set out what percentage of people are likely to work within the accepted walk distance and what percentage of journeys are currently made on foot.

Section 3.4: Existing Public Transport Facilities

Train Services

- 2.10 Comment: How does the distance to the station relate to the accepted walk and cycle distances and how might residents realistically access the site by rail.

Bus service

- 2.11 Comment: The TA needs to set out the desirable maximum walk distance to a bus stop and also needs to set out how the destinations served by the existing services compare to the destinations of residents at the proposed development and also needs to comment on the current levels of bus patronage.
- 2.12 The TA will need to be realistic as to the role that bus travel will play for journeys to and from the proposed development.

Section 3.5: Access to Local Amenities

- 2.13 Comment: The walk and cycle distances are agreed.
- 2.14 The Ta needs to include an audit of the routes to all of the facilities listed in Table 3.2, this should include highlighting any missing links or barriers that might discourage residents to walk or cycle.

Section 3.6: Existing Local Highway Network

- 2.15 Comment: This section of the TA needs to include greater detail of the existing highway network such as the presence (or otherwise) of street lighting.

Junction Review

- 2.16 Comment: Until the base year assessments have been provided and reviewed it is not possible to verify the statements about whether the junctions assessed work or not in the base year.
- 2.17 The TA will need to include assessments of all the junctions listed in section 3.7. 3

Section 3.7: Data Collection

- 2.18 Comment: The junctions assessed and date the surveys were collected are agreed as suitable for use in the assessment of the proposed development.
- 2.19 The TA will need to include individual assessments for all of these junctions in each of the scenarios assessed.

Section 3.8: Personal Injury Accident (PIA) Assessment

- 2.20 Comment: The Transport Assessment Will need to include the accident data for the most recent 60 month period at the point the TA is submitted.

CHAPTER 4 DEVELOPMENT PROPOSALS AND SITE DESIGN

Section 4.2: Development Quantum and Phasing

- 2.21 Comment: The number of dwellings in Phase 1 and Phase 2 add up to 2520, is this correct?

Section 4.3 Site Layout

- 2.22 Comment: The TA will need to indicate which elements of the site lay out the developer is seeking adoption from the County Council for and these elements will need to be agreed with CCC.

Section 4.4: Access

- 2.23 Comment: Once the form of the site access junctions has been agreed these will need to go through a Stage 1 RSA before the planning application can be determined.
- 2.24 Once the external audit of pedestrian and cycle infrastructure has been provided then it will be possible to comment on the measure needed to ensure good connectivity between the proposed site and the surrounding area.
- 2.25 The Draft TA sets out the onsite pedestrian and cycle infrastructure proposed but does not set out any off site works.
- 2.26 The details of the public transport Strategy will need to be agreed with both the bus operators and CCC to ensure the best possible bus connectivity to the site.

Section 4.5: Parking Strategy and Standards

- 2.27 Comment: The car and cycle parking standards for the final development will need to be based on the parking standards in place at the time the development comes forward for reserved matters should the outline gain consent. However, the TA needs to set out the level of parking that is indicated for site based on the latest assumed development mix and the extant parking standards in place at the time the TA is produced.

CHAPTER 5: TRAVEL DEMAND

Section 5.1: Peak Hour Determination

- 2.28 Comment: The use of the observed data to determine the network peak periods is agreed however, given the fact that the actual peak (1645-1745) is only 6 vehicles more than the standard peak period of 1700-1800 it is suggested that the latter is used to enable ease of comparison with TRICS and TEMPRO figures used in the assessment. The AM peak is agreed as suitable for use in the assessment of the proposed development.

Section 5.2: Person Trip Generation

- 2.29 Comment: The Use of TRICS to determine the likely number of trips generated by the proposed development is agreed.
- 2.30 The table below provides comment on the trip rates as set out in the Draft TA

Residential	Low	PBA includes sites on edge of Town Centre
Care Home	Agreed	
B1	Low	PBA includes sites on edge of Town Centre
B2	Low	PBA includes sites on edge of Town Centre
B8	Agreed	

PS	Agreed	
Hotel	Agreed	
Health	Agreed	This assumes an NHS walk in centre is this correct?
Supermarket	Agreed	Given the proximity of the Morisons store to the south of the site what is this likely to be in reality?

3. Archaeology

- 3.1 The proposed development at Gifford's Farm, St Ives is located within a landscape of high archaeological potential. A cropmark complex within the southern part of the site indicates the location of a settlement probable late prehistoric and Roman date (HER 08275). Additional cropmarks known in the vicinity are likely to relate to land use of a similar date range. Recent archaeological investigations in connection with development at Needingworth Road Industrial Estate have identified settlement related activity of probable Bronze Age date, with some suggestion also of late Neolithic and Early Iron Age activity (HER ECB451, ECB1608). Geophysical survey and Aerial Photographic assessment undertaken in support of the current development proposal has added a greater degree of clarity for the known cropmarks within the site and has identified an area of additional geophysical response to the north, which is also likely to reflect activity of late prehistoric or Roman date. The surveys have also defined the pattern of medieval agriculture by identifying the extent of ridge and furrow, which probably survived as earthworks until relatively recently.
- 3.2 Significant archaeological sites clearly survive within the proposed development area and further sites are likely to survive which are unresponsive to remote identification through geophysical survey and aerial photographic assessment. Without appropriate management and mitigation, these sites are likely to be severely damaged or destroyed by the development of the site. We would strongly recommend that the site is subject to an archaeological evaluation, to be commissioned and undertaken at the expense of the developer, and carried out prior to the any planning determination. The evaluation results should allow for the fuller consideration of the presence/absence, nature, extent, quality and survival of archaeological remains within the development area. An informed judgement can then be made as to whether any planning consent will need to include provisions for the recording and, more importantly, the preservation of important archaeological remains in situ. It is standard practice for this office to provide a design brief for such an evaluation.

4. Floods and Water

- 4.1 We have reviewed the submitted Technical Note (No: 4002/001 Rev B, dated 29/09/2016) and are content with the current proposal. We are pleased to see that the applicant has taken on board some of our team's comments from the previous meeting and follow up notes, from February.
- 4.2 Reviewing the document further we have detailed our key recommendations in line with the key surface water management issues identified for the site:

Sequential Approach

- 4.3 As detailed within the Technical Note the site is located in Flood Zone 1, 2 and 3 and it is therefore considered to be at risk of fluvial flooding. In addition, there is a risk of flooding from other sources, e.g. groundwater or surface water.
- 4.4 The areas bordering the site have a low to high surface water flood risk. The Environment Agency mapping shows that the majority of this surface water flood risk is likely to be between 300 -900mm depth, with a small area to the east of the site that has a high flood risk depth of >900mm. Taking this into account, as previously discussed we do support the applicant's approach of steering development away from these areas and providing a buffer zone/maintenance strip.

Flood Risk Assessment & Surface Water Drainage Strategy

- 4.5 For sites proposing 10 or more dwellings, a surface water strategy should be prepared (often alongside a Flood Risk Assessment (FRA)) to demonstrate that the proposed development will not result in an increased risk of flooding from surface water both on and off site. The surface water strategy should be prepared in accordance with the National Planning Policy Framework, the Planning Practice Guidance and the Non-statutory Technical Standards for Sustainable Drainage Systems. The latter requires development to give priority to the use of SuDS, giving preference to infiltration over discharge to a watercourse, which in turn is preferable to discharge to surface water sewer.
- 4.6 The applicant has detailed that infiltration is not feasible in this area and as part of a formal submission we would require the applicant to submit the Soakaway Test results. In light of the fact that infiltration is unlikely to be feasible on site we would accept the applicant's proposal to discharge surface water into the nearby watercourses. The applicant's proposal to restrict the discharge rate off site to Qbar, through the use of attenuation basins, swales and permeable paving is supported by the LLFA.
- 4.7 As part of a formal submission the applicant would be required to provide the relevant greenfield calculations. The proposed runoff rate should be based on the impermeable area only, as this is the area that will positively drain into the proposed drainage system. We would also need detail as to what measures will be used to restrict discharge to Qbar across the 16 outfalls. It is

recommended that when compiling the drainage plan the site is split into the three catchments, as outlined in the submitted Technical Note.

Volume

- 4.8 The applicant has detailed within the Technical Note document that in the circumstance where SuDS are excluded from future designs, the basins may be required to increase in size. We would like to highlight that for the outline application, the applicant will be required to demonstrate that adequate storage volume can be provided on a strategic level to attenuate surface water run-off from the critical 1 in 100 chance in any year storm event, with an appropriate allowance for climate change.
- 4.9 As previously recommended, source control is strongly encouraged and as such we would still expect to see the use of SuDS on future parcels/plots; to reduce the volume of water discharged off site and to provide additional treatment.
- 4.10 (Please note, it seems that the attenuation basins have been coloured incorrectly on the Preliminary Drainage Layout Plan (Drawing No: 31874/4001/SK04, Rev A). This should be corrected for future submissions).

Water Quality

- 4.11 As previously detailed, to protect the quality of receiving water bodies, surface water runoff arising from the site should be of an acceptable quality. Therefore sufficient treatment should be provided before surface water is discharged into the existing ditches within and adjacent to the site.
- 4.12 Advice on water quality best practice can be found in Chapter 4 of the Ciria SuDS Manual (C753).

Climate Change Allowances

- 5.13 Since our meeting held with the applicant on the 4th February 2016, The Environment Agency has published updated climate change allowances (published 19 February 2016) and these should be used to inform any surface water drainage strategy.
- 4.14 Further information on how these changes should be applied can be found on the .GOV website as well as within our surface water guidance document available on the Cambridgeshire County Council website:

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

http://www.cambridgeshire.gov.uk/info/20099/planning_and_development/49/water_minerals_and_waste/10.

- 4.15 We would like the applicant to consider the following at an early stage to ease the processing of future applications:

Monitoring of Flow Devices

- 4.16 The applicant has agreed to install flow monitoring devices to demonstrate that the discharge rate off site will not increase. There are records of historical flooding immediately south of the site and therefore the use of flow monitoring device would be encouraged. Our team, are supportive of this approach and are content to work with the applicant to agree on the locations and other relevant details.
- 4.17 We would advise that these devices are located immediately downstream of the outfalls and are installed at a minimum of one year prior to development. Details of this can be agreed at a later stage.

Reserved Matters Application

- 4.18 We would highly recommend that the applicant to consider at this early stage how the discharge rate will be allocated for each plot/phase and how this will be systematically logged to ensure that proposals are in line with the agreed drainage scheme. It would be recommendable to use a chart/table to tally the total area, impermeable area and total impermeable area used for each phase of the development. This will ensure for further reserved matters that stakeholders will be able to quickly evaluate how much of the allocated impermeable area has been used as each reserved matters application is submitted and development. It is recommended that the applicant splits this into the three outlined catchments. A tally table has been created for other large strategic sites such as Alconbury Weald for this very purpose.

Ordinary Watercourse Consent

- 4.19 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 Cambridge County Council's Culvert Policy for further guidance:

http://www.cambridgeshire.gov.uk/info/20099/planning_and_development/49/water_minerals_and_waste/4

- 4.20 Please note the council does not regulate ordinary watercourses in Internal Drainage Board areas.
- 4.21 It is strongly recommended that the applicant provides allows for maintenance strip alongside the ditches so that the relevant riparian owner can undertake their responsibilities accordingly.

5. Education

Background:

5.1 Cambridgeshire County Council has a statutory duty to provide education facilities for the residents of Cambridgeshire. Section 13 of the Education Act 1996 (as amended) provides that an authority is under a duty to ensure “*that efficient primary education and secondary education are available to meet the needs of the population of their area*”.

5.2 The NPPF attaches great importance to ensuring sufficient choice of school places is available and states (paragraph 72):

“Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- *give great weight to the need to create, expand or alter schools; and*
- *work with schools promoters to identify and resolve key planning issues before applications are submitted.”*

5.3 Section 106 of the Town and Country Planning Act 1990, as substituted by the Planning and Compensation Act 1991, sets in place the statutory basis for obtaining funding from developers, through Planning Obligations. Section 106(1)(d) specifically allows for the making of payments to Local Authorities on a specified date or dates or periodically.

5.4 Therefore, the overriding principle which governs Cambridgeshire County Council’s approach is that development proposals which generate a net increase to the number of dwellings within any given area would in most cases result in an increase in children, and as such would necessitate the need for school places to be provided for the children requiring them.

6.5 In order to determine whether an education contribution is required the County Council calculates the number of pupils arising from the development and then compares this to the current capacity of the catchment school. This is a well-established process based on robust figures and information.

5.6 In terms of calculating the number of pupils arising from developments – the County Council’s Research Service have developed an evidence based formulaic approach, which has been produced using information on child yield from all types of development that have occurred across Cambridgeshire and in surrounding Local Authorities.

5.7 As a detailed development mix has not been provided the number of pupils arising from the proposed development has been calculated by using the Council’s general multipliers. These are as follows:

Early years (30 pupils per 100 dwellings) = 510 places (230 entitled to free provision)
Primary (35 pupils per 100 dwellings) = 595 places
Secondary (25 pupils per 100 dwellings) = 425 places

Education Provision (early years and primary education):

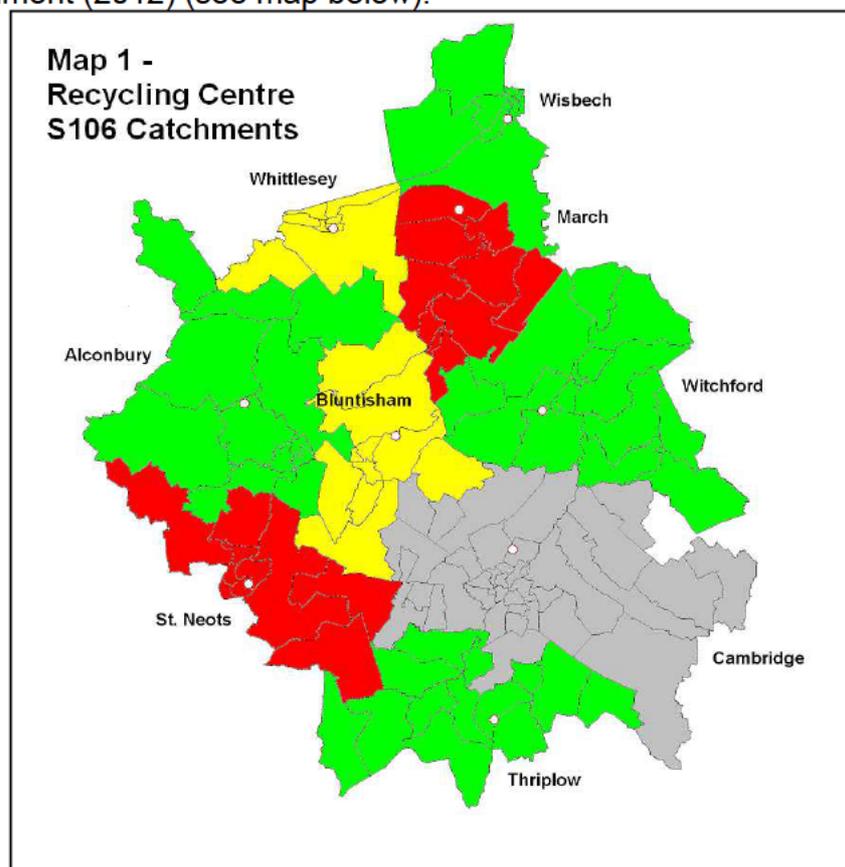
- 5.8 The County Council preferred option would be to build a 2FE with 3FE core first and then the additional 1FE classrooms as suggested in the masterplan.
- 5.8 The site shown in the parameter plans that propose 1.6Ha for 1FE School and 0.9Ha safeguarded land for the potential primary school extension to 3FE is not large enough. The site size would need to be at least 3.77 Ha for a 3FE school with 3 early years' classrooms.
- 5.9 There are concerns that if further land is developed for housing then there would be a need for a site where the school could be further expanded to a 4FE if necessary.
- 5.9 The location of the site is not suitable for primary school education as part of the site/playing fields are in flood zone 1.

Secondary Education Provision:

- 5.15 This site lies within the catchment area for St Ivo School. The PAN at the St Ivo School is 296 so there is a capacity for 1480 children there, currently there are 1429 on roll. However, the County Council's demographic data shows that in 2018/19 the school would be at capacity of 1480 due to increased numbers of children currently in catchment. The school would therefore not be able to accommodate any of the additional 425 secondary aged children that this development will generate post 2018. The County Council will therefore seek for all of the secondary places, given that the housing is unlikely to be built prior to 2018.

6 Strategic Waste

- 6.1 The delivery of new dwellings in the County will increase the demand for recycling facilities including those provided by Cambridgeshire County Council as Waste Disposal Authority.
- 6.2 Developers are therefore required to contribute towards providing and upgrading a household recycling service in order to meet the pressures of this additional growth.
- 6.3 The RECAP Waste Management Design Guide was adopted as a Supplementary Planning Document (SPD) by Cambridgeshire County Council in February 2012. The Design Guide can be found at the following address: http://www.cambridgeshire.gov.uk/info/20099/planning_and_development/49/water_minerals_and_waste/6.
- 6.4 Policy CS16 of the adopted Minerals and Waste Core Strategy requires new development to contribute to the provision of HRCs consistent with the RECAP Waste Management Design Guide.
- 6.5 Part 8 of the SPD outlines the methodology for the developer contributions to be sought through Section 106.
- 6.6 This site lies within the “Bluntisham” catchment on the S106 map in the RECAP Waste Management Design Guide Supplementary Planning Document (2012) (see map below).



6.7 The County Council will seek contributions in accordance with the contributions specified within the RECAP Design Guide. The project shortfall is noted and will be made up by the County Council and other S106 contributions. The County Council has identified a project to increase capacity at Bluntisham HRC which will have a cost of £500,000 approximately. Therefore contributions will be sought on the basis of £294.12 per dwelling.

7 Libraries and Lifelong Learning

- 7.1 Cambridgeshire County Council has a mandatory statutory duty under the Public Libraries and Museums Act to provide a comprehensive and efficient library service to everyone living, working or studying in Cambridgeshire.
- 7.2 The importance of libraries to the quality of life, well-being, social, economic and cultural development of communities is recognised both nationally and locally. Therefore, it is important to include access to a range of library facilities to meet the needs of the residents of this new development for information, learning and reading resources in connection with work, personal development, personal interests and leisure.
- 7.3 The number of new residents arising from the scheme has been calculated by using the Council's general household multipliers and equates to approximately 3,961 new residents (1,700 dwellings x 2.33 average household size, see below).
- 7.4 This development will greatly increase the pressure on the town centre library in St Ives which already serves the existing population of just over 16,400. Developer contributions will be sought on the basis of £42.12 per head of population increase. This figure is based on the MLA Standard Charge Approach for public libraries (Public Libraries, Archives and New Development: A standard Charge Approach (Museums, Libraries and Archives Council, May 2010).
- 7.6 Therefore the total contributions from this development which are required for mitigating the pressures on libraries and lifelong learning provision are **£166,837.22** (3,961 new residents x £42.12).

This contribution would be used for:

- Internal enhancements;
- Change of layout to provide more shelving and resources to serve these new residents.

8 Monitoring Fees

8.1 The County Council will agree a monitoring charge by negotiation with the developer having regard to the complexity of development and the resources, required to monitor that development, for example:

- Multiple triggers for a single payment (instalments);
- Different triggers for different payments;
- Non-financial obligations;
- The size of the development;
- Viability review mechanisms;
- Ongoing monitoring of the development.

8.2 The basis for calculation of the charge will be an officer rate of £50 per hour.

**LAND AT GIFFORD'S
PARK, ST IVES,
HUNTINGDONSHIRE**

**ES
SCOPING
REPORT**

May 2018
On behalf of Hallam Land Management

Carter Jonas

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1. INTRODUCTION

- 1.1 Hallam Land Management has secured a Screening Opinion from Huntingdonshire District Council (HDC) confirming that the Proposed Development of Gifford's Park, on land east of St Ives, is considered to be an Environmental Impact Assessment Development and that a planning application for the scheme must be accompanied by an Environmental Statement.
- 1.2 To comply with the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations 2017), this Scoping Report is accompanied by the following:
- Site Location Plan (drawing no.6949-L-01) identifying the extent of the site boundary in red;
 - Parameters Plan (drawing no.6949-L-03 Rev A)
 - Illustrative Masterplan (drawing no.6949-L-02 Rev E) setting out details of the Proposed Development
- 1.3 This Scoping Report has been prepared to identify the likely significant environmental effects associated with the Proposed Development. The effects identified as likely to be significant will be assessed further in the Environmental Impact Assessment (EIA) and detailed within the Environmental Statement (ES). This Scoping Report has been prepared for submission to HDC to assist the Council in forming a Scoping Opinion.

Need for an Environmental Impact Assessment

- 1.4 The EIS Regulations 2017 were made on 18th April 2017 and came into force on 16 May 2017. The Regulations provide descriptions of Development and applicable thresholds and criteria for the purposes of the definition of 'Schedule 2 Development'. We conclude that the scheme falls within the category of projects in Schedule 2 [10b] 'Urban Development Projects'. Schedule 2 indicates that where the development exceeds the following thresholds it is necessary to consider whether an EIA is required:-
- a) includes more than 1 hectare of urban development which is not dwellinghouse development; or
 - b) the development includes more than 150 dwellings; or
 - c) the overall area of the development exceeds 5 hectares.
- 1.5 The Government's Planning Practice Guidance provides thresholds above which an EIA is likely to be necessary. For 'Urban Development Projects' EIA is more likely to be required on sites which have not previously been intensively developed where:-
- a) the area of the site is more than 5 hectares; or
 - b) it would provide a total of more than 10,000 sq.m. of new commercial floorspace; or
 - c) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).
- 1.6 A request that HDC adopt a Screening Opinion in relation to the Proposed Development of Gifford's Park was submitted on the 11th December 2017. A copy is attached as **Appendix 1**. A Screening Opinion was provided on the 19th January 2018 and is attached as **Appendix 2**.

Scoping

- 1.7 It is recognised that in order for the EIA to fulfil its primary objective of enabling environmental considerations to be incorporated into the decision making process, it must be focused on the most important environmental issues. Therefore, Regulation 15 of the EIA Regulations 2017 provides an applicant with an opportunity to seek a Scoping Opinion from the local planning authority (LPA).
- 1.8 Regulation 15 requires the following information to be submitted with a request for a scoping opinion:
- i. a plan sufficient to identify the land;
 - ii. a brief description of the nature and purpose of the Development, including its location and technical capacity;

- iii. an explanation of the likely significant effects of the Development on the environment; and
- iv. such other information or representations as the person making the request may wish to provide or make.

1.9 The project team has carried out a scoping exercise to identify the likely significant environmental effects and the need for further study. The proposed scope of the EIA, as presented in this Scoping Report, has been determined through the following:

- Desktop and baseline studies;
- Consultation with HDC;
- Consultation with statutory/non-statutory stakeholders to the planning process.

1.10 This Scoping Report contains the required information and identifies the potential environmental impacts associated with the Proposed Development so that these issues can be assessed as part of the EIA process.

Other Supporting Documents

1.11 In addition to an ES and its supporting technical appendices, a planning application for the Proposed Development would be accompanied by the following:

- Design and Access Statement;
- Relevant drawings, including Site Location Plan, Masterplan, Landscape Masterplan
- Planning Statement
- Statement of Community Engagement;
- Phase 1 Ground Conditions
- Topographic Survey
- Services & Utilities;
- Energy Statement; and,
- Waste Strategy

Report Structure

1.12 Section 2 describes the Assessment Site and the Proposed Development. Section 3 explains the scoping methodology and Section 4 considers identified environmental topics; identifying the baseline conditions for each topic area, the potential significant effects of the Proposed Development; and establishes the methodology for assessing the significant effects. Section 5 provides a summary of the information to be provided in the ES.

2. ASSESSMENT SITE & PROPOSED DEVELOPMENT

Assessment Site

- 2.1 The Assessment Site comprises agricultural land that presently bounds the urban fabric of St Ives to the east of the town. To the west the Assessment Site is bounded by the B1040 Somersham Road, which links St Ives with the settlement of Somersham. Immediately west of the B1040 is the Somersham Road Industrial Estate, a well-established employment area of the town. The Assessment Site adjoins a farmstead (Hill Side View) and a small employment area east of Somersham Road, immediately to the north east of the B1040/Marley Road roundabout junction.
- 2.2 To the south, the Assessment Site is bound by the Compass Point Business Park, the Arena Structures employment site: and the A1123 Needingworth Road, which links St Ives with the villages of Needingworth, Bluntisham and Earith. To the east and north east, the Assessment Site is almost wholly contained by the site of the St Ives Golf Course.

Proposed Development

- 2.3 The Proposed Development is for a sustainable mixed use urban extension of St Ives. The scheme will comprise the following principal elements:-
- Up to 1,750 new dwellings, including affordable housing;
 - An Extra Care / Care Home;
 - Employment;
 - A Three Form Entry Primary School;
 - Hotel;
 - Supermarket;
 - Health care provision;
 - Neighbourhood Centre;
 - A site for the relocation of St Ives FC;
 - Green infrastructure, including Public Open Space, a Sustainable Drainage System and Structural Landscaping.
- 2.4 The Proposed Development is anticipated to be developed in two phases as illustrated on the accompanying drawings and in Table 2.1 below.

Table 2.1: Proposed Development & Phasing

Proposed Development	Phase 1	Phase 2	Notes
Housing (C3)	850 dwellings	900 dwellings	Phase 1 - 21 Ha & Phase 2 - 24.9 Ha
Extra Care / Care Home (C2)	0.70 Ha	-	80 beds up to 5,100sq.m GIFA
Employment (B1c)	0.63 Ha	0.72 Ha	Up to 4,250sq.m. GIFA
Employment (B8)	0.63 Ha	0.72 Ha	Up to 4,250sq.m. GIFA
Primary School (D1)	3.00 Ha		3 FE
Hotel (C1)	0.40 Ha	-	100 rooms up to 3,250sq.m GIFA
Supermarket (A1)	1.05 Ha		Up to 2,800sq.m GIFA
Health Care (D1)	0.35 Ha		Up to 1,350sq.m GIFA (area allows for surgery and pharmacy)
Neighbourhood Centre (A1, A3, A4, A5,C3)	0.60 Ha		Up to 1,000sq.m GIFA (residential apartments above)
Relocation site for St Ives FC	3.9 Ha		
Green Infrastructure	66.95 Ha		Public Open Space, SuDS, Structural Landscaping
Access and Spine Road	3.25 Ha		Proposed vehicular access and spine road zone

3. APPROACH TO ASSESSMENT

Predictive Methods & Assessment Criteria

- 3.1 EIA employs a range of tools and approaches aimed at predicting the likely nature and extent of environmental impact. Some technical assessments rely on mathematical models which provide a quantitative estimate of the size of an environmental change or impact, such as the levels of noise or air pollutants likely to arise from new traffic. Other technical assessments, rely on map-based techniques to plot the extent of land use change or habitat loss or use illustrative methods, to communicate how the Proposed Development might appear in a particular viewpoint.
- 3.2 The predictions in the EIA will indicate the nature and magnitude of the project's effects, to enable informed planning decisions about the likely environmental outcomes of the Proposed Development. These predictions will however be subject to a degree of uncertainty; and the tools employed, and the assumptions made in each case will therefore be set out clearly.
- 3.3 Predicted environmental effects are described by reference to their anticipated significance. Significance is not an absolute concept, but is usually framed with reference to thresholds or criteria. A range of quantitative and qualitative thresholds and values tend to be used, supported by narrative descriptors. The aim is to ensure the terms and assumptions used in assessing significance are transparent.
- 3.4 The purpose of scoping is to determine, from a review of all possible effects, those that are likely to be significant and to ensure that resources and time are focused in the appropriate areas. The difficulty in identifying potentially significant effects at the scoping stage is that there is not always sufficient information available to make a judgement. In the case of the Assessment Site the environmental baseline is sufficiently well-defined to make clear decisions on key issues to be included in the EIA.
- 3.5 The methods and approaches proposed for predicting and assessing impacts are set out later in this Scoping Report.

Assessment Methodology

- 3.6 The EIA will be undertaken in line with best practice guidance, including the following:
- Planning Practice Guidance (PPG) (published 6th March 2014); and,
 - Department for Environment, Transport and the Regions: Environmental Impact Assessment – A Guide to Procedures 2000;
 - Institute of Environmental Management and Assessment: Guidelines for Environmental Impact Assessment 2002; and
 - Department of Transport Design Manual for Roads and Bridges Volume 11: Environmental Assessment.
 - Landscape Institute and Institute of Environmental Management and Assessment Guidelines for Landscape and Visual Assessment – Third Edition (2013) (GLVIA3)
- 3.7 Some surveys of the Assessment Site's existing conditions have already been undertaken. These have involved both on-site measurement and desk-based analysis of relevant data. Further field surveys required during the course of the EIA process will utilise information already supplied and agreed by relevant parties, including new information provided in response to this EIA Scoping Report. This information will establish a baseline against which changes caused by the Proposed Development can be assessed.
- 3.8 The assessment of the environmental effects of the Proposed Development on the baseline conditions will be undertaken using specific methods of prediction including established guidelines and techniques.
- 3.9 Methods of prediction to be applied within this EIA will be either quantitative or qualitative or in certain instances, both. Quantitative methods predict measurable changes as a result of the Proposed Development and rely on accurately measuring baseline conditions to make accurate predictions with the Proposed Development completed. Qualitative assessment techniques rely on expert judgment and are exercised within a structured framework to ensure consistency of conclusions drawn. Clear distinctions will be made between

matters of fact, judgment and opinions with all sources identified. Assumptions made, degrees of confidence and areas of uncertainty in the prediction will be clearly stated.

- 3.10 In assessing the significance of any effect, regard will be had to:
- the likelihood of the effect occurring, based on a scale of certain, likely or unlikely;
 - the magnitude of the effect, based on a scale of major, moderate, slight, neutral and unknown;
 - the duration of the effect, based on a scale of long, medium and short term;
 - the reversibility of the effect, being either reversible or irreversible;
 - the value of the receptor, based on a scale of international, national, regional, local and negligible; and
 - the sensitivity of the receptor to the effect, based on a scale of high, medium and low.
- 3.11 In order to provide a consistent approach to the presentation of the significance of effects, the following terminology will be used throughout the ES:
- Adverse: detrimental or negative effect to an environmental resource or receptor;
 - Neutral: no significant effect to an environmental resource or receptor;
 - Beneficial: advantageous or positive effect to an environmental resource or receptor.
- 3.12 Effects will be defined as either “significant” or “not significant”. Significant effects would be considered material to the planning decision process.
- 3.13 Predicted significant effects will then be generally classified according to the following scale, where recognised issue specific impact assessment guidelines do not exist:
- Negligible: effects which are beneath levels of perception, and within normal bounds of variation
 - Minor: slight, very short or highly localised effect;
 - Moderate: limited impact (by magnitude, duration, reversibility, value and sensitivity of receptor) which may be considered significant; and
 - Major: considerable impact (by magnitude, duration, reversibility, value and sensitivity of receptor, which may be more than of a local significance or lead to a breach of a recognised environmental threshold, policy, legislation or standard).
- 3.14 As part of the design and EIA process, measures will be developed and discussed with relevant consultees (e.g. Natural England, Historic England, Environment Agency) to avoid, reduce, or remediate any adverse effects, or provide enhancements.
- 3.15 Individual technical assessments will:
- examine the effects of the Proposed Development without mitigation; and
 - take into account the effects of measures to mitigate the potential adverse effects and enhance the potential beneficial effects of the Proposed Development to establish the residual impacts.

Identification of the Baseline

- 3.16 The baseline, against which the likely significant effects are to be assessed, comprises the existing land uses and the environmental conditions at and surrounding the Assessment Site at the time of the preparation of the ES.

Identification of Key Issues

- 3.17 Guidance regarding the content of the EIA is contained in Schedule 4 of the EIA Regulations 2017.
- 3.18 Amongst others this requires the ES to include:
“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.”

- 3.19 Based on the Proposed Development, local planning policy and the project team's knowledge of the Assessment Site and its environs, an assessment has been made regarding which of these topics or particular aspects of them can be 'scoped in' and 'scoped out' of the EIA. Issues that are scoped into the EIA are judged likely, without effective mitigation, to have the potential to cause significant effects. Issues that are scoped out of the EIA are those which are not anticipated to result in significant effects. It should however be noted that as the assessment proceeds, omitted topics will be kept under review and their significance may be re-evaluated in response to additional information or changes to the Proposed Development.

Cumulative Effects

- 3.20 An assessment of the cumulative effects of the Proposed Development together with other committed but not yet built schemes, located in close proximity to the Assessment Site and deemed to have potentially significant effects will be included in the ES. At this stage, there are no committed schemes that it is anticipated will need to be assessed cumulatively with the Proposed Development:

Temporal Scope

- 3.21 The EIA will address the demolition and construction phase, currently anticipated to commence in 2021 (subject to gaining planning permission), and the completed development phase. Where effects are dependent upon longer term considerations such as traffic growth or future development the completed phase will extend further to take account of the longer-term nature of effects which may occur.

Spatial Scope

- 3.22 The geographical coverage of the EIA will be determined by a number of factors including:
- The physical extent of work;
 - The nature of the baseline environment, including the location of sensitive receptors;
 - The distance over which effects will be significant; and
 - The presence and type of "pathways" along which effects may be spread.

4. TECHNICAL SCOPE OF WORK

- 4.1 The proposed technical scope of works is outlined below. As identified above, the scoping exercise addresses the potential significant environmental effects associated with the Proposed Development.

Soils & Agricultural Land

- 4.2 The scope of this part of the EIA will include an assessment of the effects of the Proposed Development on three identified sensitive receptors: soil resources and their functions; best and most versatile agricultural land (grades 1, 2 and subgrade 3a), and agricultural activity within the Site (agricultural users).

Baseline Conditions

- 4.3 To date, a baseline report outlining soil resources and agricultural quality of land within the Site Area has been completed. The site is found to be comprise 58% best and most versatile land (subgrade 3a) with three soil types identified: heavy clayey soils; loamy over clayey soils and; loamy over stony soils.

Methodology & Scope

- 4.4 Information regarding soils and agricultural land resources will be obtained via a desk study (reviewing published and unpublished soils and agricultural land quality surveys) following which a detailed soil survey will be carried out to Natural England guidelines (TIN049) with a sampling density of one observation per hectare. The data obtained from both the desk study and field work will be used to create a baseline of soil resources. The soil survey information will also be used, alongside published data, to assess the agricultural land quality of the Site and subsequently analyse the effect of the Proposed Development on best and most versatile agricultural land. Agricultural users will be interviewed to ascertain the effects of the Proposed Development on agricultural activity at the Site.

Archaeology & Cultural Heritage

- 4.5 The assessment will provide a description of the findings of desk studies, a geophysical survey and evaluation trenching and consultation with Cambridgeshire County Council Archaeology Department. The assessment will provide an evaluation of the importance of archaeological remains present within the Assessment Site. The significance of any effects on designated and non-designated heritage assets will be assessed. Where significant effects are identified, suitable mitigation to prevent, reduce or offset any significant adverse effects or enhance any beneficial effects will be recommended and any residual effects recorded.

Baseline Conditions

- 4.6 The baseline conditions of the Assessment Site have been established through the undertaking of a heritage desk based assessment, aerial photo assessment and a geophysical survey. These surveys identified an extensive Roman settlement in the south eastern part of the site, with further potential prehistoric remains in the area of the Gifford's Farm buildings and also in the north eastern area of the Assessment site. Following consultation with Cambridgeshire County Council, evaluation trenching of the site was undertaken in accordance with a Written Scheme of Investigation approved by Cambridgeshire County Council. This investigation has confirmed the presence of a Roman settlement in the south eastern area of the site, some late Prehistoric/Roman remains to the west of Gifford's Farm and an area of Iron Age settlement in the north eastern quadrant of the Assessment Site.
- 4.7 The desk based assessment has established that there are no designated heritage assets within or in the vicinity of the Assessment Site.

Methodology & Scope

- 4.8 The results of the desk-based assessment, aerial photo assessment, geophysical survey and evaluation trenching will be used to assess of the effects of the construction of and operational effects of the Proposed

Development on the significance of the non-designated heritage assets located within the site. The methodology for determining significance of impact will be done by establishing the magnitude of change for heritage assets potentially affected by the Proposed Development. The sensitivity of the heritage assets potentially affected which will depend on factors such as the condition of the asset and its perceived heritage value and significance. The sensitivity of the heritage asset receptor will be defined by its heritage significance in terms of national, regional or local statutory or non-statutory protection and grading of the asset. The sensitivity of the heritage assets, together with the magnitude of change, defines the significance of the impact.

- 4.9 Proposed mitigation measures will be identified in order to avoid impacts if possible. Where inevitable or unavoidable impacts occur, measures will be proposed in order to reduce or compensate for impacts. All potential impacts and mitigation will be assessed against and informed by national and local planning guidance including the NPPF. The mitigation measures are anticipated mainly to comprise archaeological investigation and recording where remains identified do not merit preservation or impact from the Proposed Development is unavoidable.

Ecology

- 4.10 The assessment will provide a description of the findings of desk studies, consultation with ecological stakeholders and the results of the Phase I Habitat Survey and protected species surveys undertaken on the site. The assessment will provide an evaluation of the importance of the habitats and species present within the Assessment Site. The significance of any ecological effects will be assessed. Where significant effects are identified, suitable mitigation to prevent, reduce or offset any significant adverse effects or enhance any beneficial effects will be recommended and any residual effects recorded.

Designated Sites

- 4.11 No statutory designated sites of international, national/regional or local nature conservation importance have been identified within 5, 2 or 1km of the Assessment Site, respectively.
- 4.12 No non-statutory designated sites of nature conservation importance are located within or immediately adjacent to the Assessment Site, however Meadow Lane Gravel Pits County Wildlife Site (CWS) is located approximately 430m south of the Assessment Site and is noted for its standing water, fen and reed bed habitats. The site is also important for its dragonfly populations and nationally scarce vascular plant species.

Existing Legally Protected / Notable Species Records

- 4.13 The Cambridgeshire & Peterborough Environmental Records Centre provided a number of protected and notable species records from within 1km of the Assessment Site. These included records of both barbastelle *Barbastella barbastellus* and natterer's bat *Myotis nattereri*, badger *Meles meles*, hedgehog *Erinaceus europaeus*, otter *Lutra lutra* and number of notable moth and butterfly records from Meadow Lane Gravel Pits CWS. A single water vole *Arvicola amphibius* record is present along Parson's Drove Drain which flows south along the western boundary of the Assessment Site.

Phase 1 Habitat Survey

- 4.14 The extended Phase I habitat surveys have established that the Assessment Site is dominated by intensively managed arable farmland with small areas of improved grassland, semi-mature broadleaved plantation woodland and a single field pond. Hedgerows and ditches formed the boundaries of the arable fields with a small number of mature tree standards occurring along the eastern boundary. All hedgerows consisted of at least 80% native woody species and as such are considered to be habitats of principal importance under the Natural Environment and Communities (NERC) Act 2006.
- 4.15 No invasive non-native species were recorded during the survey.

Faunal Surveys

- 4.16 The faunal surveys conducted through 2015 and 2016 identified the following:

- No evidence of great crested newt was identified within the waterbodies on the Assessment Site or those located within 500m of the Assessment Site boundary and subject to assessment.
- Six species of bat, common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, noctule *Nyctalus noctua*, Nathusius pipistrelle *Pipistrellus nathusii*, brown long-eared *Plecotus auritus*, barbastelle and two species groups *Myotis* and *Nyctalus* have been recorded during activity surveys. Areas of peak bat activity generally comprised the northern most field compartment, the farm buildings within the south-centre and the western and eastern boundaries. Further bat activity surveys are proposed for April and May 2017. No evidence of roosting bats was noted in association with any of the mature trees or farm buildings present within the Assessment Site.
- Eighteen and twenty bird species of conservation status (i.e. Wildlife & Countryside Schedule I, Species of Principal Importance or Red and Amber Birds of Conservation Concern (BoCC) listed species) were recorded during the breeding bird and wintering bird surveys respectively. Given the nature of the habitats available within the Assessment Site, a farmland bird assemblage largely comprising common to widespread were recorded during the surveys. The hedgerows and plantation woodland supported a small number of woodland edge species including dunnock *Prunella modularis* and song thrush *Turdus philomelos*.
- No evidence of water vole or otter was observed in association with the on-site waterbodies, ditches and the Parson's Drove drain forming the western boundary. A further water vole survey is proposed during spring 2017.

Methodology & Scope

- 4.17 Reporting will follow guidelines as set out in the Guidelines for Ecological Impact Assessment (EclA) (CIEEM, July 2016). This will include an evaluation of habitats and species present on site including an assessment of their importance at local, regional, national and international level.
- 4.18 The potential impacts on the habitats and species present will be assessed including direct loss of habitats, impacts during construction including damage to valuable habitats, impacts during operation including increased human pressure, combined impacts of other potential developments in the area and interactive impacts on flora and fauna will be assessed in relation to all of the above. Proposed mitigation measures will be identified in order to avoid impacts where possible. Where inevitable or unavoidable impacts occur, measures will be proposed in order to reduce or compensate for impacts. All potential impacts and mitigation will be assessed against and informed by national and local planning guidance including the NPPF and National and Local Biodiversity Action Plans.
- 4.19 In addition to mitigation and compensation measures, reference will be made to enhancement measures where possible focusing on targets for habitat creation or sympathetic management within local Biodiversity Action Plans. All appropriate measures will be implemented to ensure that the Proposed Development will conserve and enhance the on-site biodiversity and provide increased opportunities for bats and other wildlife.

Flood Risk & Drainage

- 4.20 The assessment will consider potential impacts on surface water resources, groundwater resources and flood risk likely to arise due to the Proposed Development. Potential impacts on water consumption and foul drainage capacity will also be considered.
- 4.21 The Flood Risk Assessment (FRA) will focus specifically on any constraints relating to flood risk and surface water drainage, confirm the extent of existing flood risk from all sources, and propose appropriate mitigation measures to manage flood risk and surface water drainage.

Baseline Conditions

- 4.22 The Environment Agency's (EA) National Generalised Modelling (NGM) Flood Zones Plan indicates predicted flood envelopes of Main Rivers across the UK. In many circumstances, the NGM is based on basic catchment characteristic data and modelling techniques. Where appropriate, more accurate Section 105 / SFRM models are produced using more robust analysis techniques.

- 4.23 The EA flood map shows the site to be partially within the 1% probability (1 in 100 year return period) floodplain, hence within Flood Zone 3: High Probability. The site is also partially within the 0.1% (1 in 1000 year return period) floodplain, hence within Flood Zone 2: Medium Probability. A large portion of the site (mostly the eastern extent of the site) is identified to be outside the 0.1% probability (1 in 1000 year return period) floodplain, hence within Flood Zone 1: Low Probability.
- 4.24 In accordance with policy, the Proposed Development will implement a site storm water drainage system that provides Sustainable Drainage (SuDS) measures consistent with the recommendations of the NPPF, local SFRA guidance and published documents in the form of CIRIA C753 et al. There are opportunities for wetland habitat creation as part of the SuDS scheme. The proposed Green Infrastructure would enhance the local landscape and also be beneficial for nature conservation.
- 4.25 In terms of foul drainage, the Assessment Site lies within the catchment of the St Ives Water Recycling Centre (WRC) which is located approximately 400m west of Gifford’s Park. Anglian Water (AW) advised in their Pre-Development Report (2015) that there was insufficient capacity in the WRC to accommodate the foul flows from the full extent of the Proposed Development. AW are obligated to accept the foul flows upon obtaining planning permission from the LPA. They would therefore take the necessary steps to ensure that there is sufficient capacity at the WRC. The proposed strategy to convey the foul flows from the Proposed Development consists of a pumping station and a rising main that will pump directly towards St Ives Water Recycling Centre (WRC).
- 4.26 There is the potential that the discharge from the WRC may be limited due to existing permits in place by the Environmental Agency (EA). If any other developers in the area have secured capacity in the WRC since issue of the PDR there is the potential that that this permit will need to be reviewed in order to accommodate the proposed discharge from the WRC associated with Gifford’s Park. AW advised in Feb 2017 that these discussions with the EA regarding the extent of the existing permit would be undertaken upon the submission of an underwriting agreement.

Methodology & Scope

- 4.27 As the site is partly located in Flood Zones 2 and 3 a stand-alone FRA will be prepared for inclusion as an appendix to the Environmental Statement.
- 4.28 The EIA process will include the assessment of construction impacts on surface water and groundwater and will also involve surface runoff calculations as part of the FRA. An assessment of the proposed drainage design for the development will be provided; opportunities for recycling and reuse of rainwater and pollution prevention measures will be considered to ensure potential adverse impacts are minimised.
- 4.29 Table 4.1 below presents a summary of the scoping process, identifying which likely environmental effects have been scoped in (i.e. those which are considered significant) and out of the assessment during both the demolition/construction and completed development phases, and the assessment methodology which will be used to assess the likely significant effects.

Table 4.1: Flood Risk & Drainage Scope

Likely Significant Effect	Scoped in (✓) or out (✗)	Reason	Assessment Methodology
Construction Phase			
Effects on Waterbodies and Surface Water	✓	There is potential for a detrimental effect on flood risk, surface water quantity and quality as well as on groundwater during the construction phases.	A Construction Environmental Management Plan will need to be produced to cover drainage and flood risk elements applicable during the construction phases.
Effects on Human Health	✓		
Effects on Surface Water and Groundwater Quality	✓		

Effects on Foul Water Resource	✓	Effluent likely to be discharged to existing public foul sewer during the construction phases.	Submission of pre-development enquiry.
Effects on Water Resource	✓	The site may place an additional demand on the water supply during the construction phases.	Submission of pre-development enquiry.
Completed Development			
Effects on Waterbodies and Surface Water	✓	The development will result in an increase in surface water runoff that will discharge into the existing watercourses increasing flood risk and potentially have a detrimental effect on water quality.	A site specific Flood Risk Assessment and Drainage Strategy will be prepared in accordance with National Planning Policy Framework (NPPF) Planning Practice Guidance (PPG) and local planning policy relating to flood risk and drainage.
Effects on Human Health	✓		
Effects on Surface Water and Groundwater Quality	✓		
Effects on Foul Water Resource	✓	There is not sufficient capacity to accept the increased flows from the development.	Submission of pre-development enquiry.
Effects on Water Resource	✓	The development will place an additional demand on the water supply	Submission of pre-development enquiry.

Landscape & Visual

- 4.30 The Proposed Development will change the nature of the land use within the Assessment Site to provide a mixture of land uses. The landscape and visual assessment will describe the existing baseline conditions relating to the Assessment Site and the potential effects of the Proposed Development upon landscape character and visual amenity of the area. The assessment will also consider the landscape sensitivity of the Assessment Site and its capacity to accommodate the Proposed Development. Landscape and visual effects are an important consideration in the process of arriving at a successful and sympathetic proposal for the Assessment Site. In this context the assessment will ensure that the Proposed Development will protect, restore and replace landscape elements; as well as mitigate its effects upon the landscape character. Existing retained features will form the basis of a cohesive, multifunctional Green Infrastructure (GI) framework.
- 4.31 The identification, assessment and mitigation of effects on landscape and visual amenity will be undertaken in partnership with all other relevant specialist disciplines including ecology.

Baseline Conditions

- 4.32 The Assessment Site and its immediate landscape context are not subject to any national, local or other landscape designations. The Assessment Site is presently used as agricultural land with associated farm buildings and infrastructure. The surrounding context to the west and south west is a mixture of employment and commercial land uses with some residential. The St Ives (Hunts) Golf Club is located to the east and north east of the site boundary and the wider context to the north and east is arable farmland. The Assessment Site has a semi-urban character to its southern and western sides where the existing settlement edge exerts an influence. The eastern and north eastern portions are influenced less by the settlement edge, although aspects of it remain visible.
- 4.33 The landform of the area falls away in gentle undulations towards the River Great Ouse as it passes to the south of St Ives. The Assessment Site itself has gentle undulations providing changes in height, but overall it experiences a north to south fall which provides a slight southerly aspect. The Assessment Site does not include landscape features of notable value and has a lack of substantive tree cover or trees. Hedgerows are fragmented and typically follow drainage ditches that define the large-scale geometric field pattern. The visual

envelope of the Assessment Site is contained by topography to the north, vegetation to the east and employment uses to the south and south west. Views towards the Assessment Site are primarily limited to places of work, adjacent roads and the golf course to the east. The Assessment Site is not publically accessible.

Methodology & Scope

- 4.34 The landscape and visual assessment will be produced in accordance with the Landscape Institute and Institute of Environmental Management and Assessment “Guidelines for Landscape and Visual Assessment – Third Edition (2013) (GLVIA3).
- 4.35 GLVIA3 does not impart a prescriptive approach to assessment but, instead, identifies principles and good practice. The methodology for this assessment will be based on this approach. The detailed assessment would enable the potential landscape and visual effects to be determined and a landscape design and mitigation strategy to be put forward as part of the planning application.
- 4.36 The landscape character assessment will consider the effects on both the local landscape resources and the wider context of the Assessment Site i.e., from the physical effects on site-based features and characteristics, to the potential effects on the wider landscape character. Similarly, the visual impact assessment will consider the potential visual effects upon receptors (such as rights of way and properties) bordering the Assessment Site and located within the wider area.
- 4.37 A series of key viewpoints to be assessed will be agreed with the LPA.
- 4.38 Table 4.2 below presents a summary of the scoping process, identifying which likely environmental effects have been scoped in (i.e. those which are considered significant) and out of the assessment during both the demolition/construction and completed Development phases, and the assessment methodology which will be used to assess the likely significant effects.

Table 4.2: Landscape and Visual Scope

Likely Significant Effect	Scoped in (✓) or out (✗)	Reason	Assessment Methodology
Construction Phase			
Effects on statutory or non-statutory designations such as Areas of outstanding Natural Beauty	✗	The Assessment Site does not fall within a special landscape area or within a statutory or non-statutory designated area.	
Change to landscape character	✓	Construction of the Proposed Development within the Assessment Site has the potential to affect landscape character.	The methodology will be drawn from the Landscape Institute and the Institute of Environmental Management and Assessment’s guidelines for Landscape and Visual Effect Assessment, third edition.
Impact upon views from surrounding receptors, including rights of way and properties	✓	Construction of the Proposed Development within the Assessment Site has the potential to affect views.	
Completed Development			
Change to landscape character	✓	The Proposed Development will introduce new buildings which have the potential to affect landscape character.	
Impact upon views from surrounding receptors,	✓	The Proposed Development will introduce new buildings which	

including rights of way and properties		have the potential to affect views.	
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Transport & Access

4.39 The assessment will describe the methods used to assess the likely effects on transport and access; the baseline conditions currently existing at the Assessment Site and in the surrounding area; the likely effects of the Proposed Development; possible mitigation measures required to prevent, reduce or offset the likely significant effects; and the likely residual effects. A Transport Assessment (TA) and Framework Travel Plan (FTP) will be submitted as an appendix to the ES in support of the planning application.

Previous Assessment

4.40 No previous assessment of transport has been undertaken in relation to the Proposed Development or Site.

Baseline Conditions

4.41 Baseline data relating to the site and its surroundings has and will be compiled using the following sources:

- Site visits;
- Desktop studies;
- Traffic Surveys.

4.42 A number of site visits have been undertaken by PBA between June 2015 to April 2018 and more will be undertaken in advance of the planning submission. The purpose of the site visits were and will be to review the proposed access(es) to the Gifford's Park site from the surrounding highway network, to establish baseline traffic levels, undertake an audit of all access routes to the site and to identify any existing/potential transportation opportunities/constraints.

Existing Pedestrian, Cycle and Equestrian Network

4.43 There is currently a footpath located opposite the Gifford's Park site that provides a link along Somersham Road, which can be used by pedestrians to travel to St Ives Town Centre.

4.44 The local cycle network maps will be included in Appendices of the TA. There is a good provision of street lighting along the eastern side of Somersham Road and its speed limit of 40mph combined with a grass verge, separating the existing footway from the carriageway, creates a safe environment for pedestrians and cyclists.

4.45 National Cycle Network route 51 is within the vicinity of the site, and connects Huntingdon and St Ives to Cambridge. The majority of this section of the route is along a cycle track, part of the Cambridgeshire Guided Busway (but segregated from the busway) and is therefore free from vehicular traffic. The existing cycling infrastructure within the Assessment Site's vicinity offers a safe route for cyclists wishing to make inter-urban strategic trips through St Ives and beyond. Currently there is a gap in dedicated off road pedestrian and cycle provision between the site and the National Cycle Network as there is no footway/cycleway along the most northern section of Harrison Way.

Existing Public Transport

4.46 St Ives is served by various bus services, which link several parts of St Ives as well as providing connections to key destinations such as Cambridge, Huntingdon and Peterborough. The closest bus stops to the development site are located on Marley Road and St Audrey Lane 450m (6 min walk) and 600m (8 min walk) from the site accesses respectively. The centre of the site is located 1km and 1.2km from these bus stops respectively. A continuous footway (with drop kerbs provided where appropriate) is currently provided between the site boundary with the A1123 and both bus stops. In addition, a footway is located on the opposite side of the site boundary along Somersham Road, which provides a link to each bus stop. The distance to each bus stop from the site boundary falls within the maximum distance category for commuter walking of 2,100m.

- 4.47 The nearest rail station is located within Huntingdon which is 9km west of the site. This station provides 212 cycle parking spaces and 742 car parking spaces. Trains from Huntingdon regularly depart, every 30 minutes throughout the day starting at 03:40 and running into the evening, to London Kings Cross to the south and Peterborough to the north. During the evening trains in each direction operate every 30 minutes. Rail provides residents and employees of the Proposed Development with a sustainable mode of transport for commuting to London and longer journeys further afield.

Highway Network

Somersham Road

- 4.48 Somersham Road is a single carriageway road running from Somersham to where it forms a roundabout junction with St Audrey Lane in the south. At the site boundary, Somersham Road is subject to a 40mph speed limit. A de-restricted speed limit is in force to the north when St Ives towards Somersham. Somersham road is approximately 6m wide. A 1.2 – 2.0m wide footway is located on the western side of Somersham Road between Marley Road and St Audrey Lane. One of the two development site accesses will be off Somersham Road. This access will take the form of a fourth arm off an improved and enlarged version of the existing Marley Road / Somersham Roundabout.

A1123

- 4.49 The A1123 is a single carriageway road running from Huntingdon through St Ives to Soham. The development site will take its main access from the A1123 midway between the Harrison Way/ A1123 roundabout and the A1123 Needingworth roundabout. The A1123 at this point is subject to the national speed limit (60mph). A shared cycle/footway is located on the Proposed Development side of A1123 for its entire length between the site and Needingworth.

Harrison Way

- 4.50 Harrison Way is a single carriageway road running from its roundabout junction with the A1123 up to where it becomes London Road at the Low Road/Hemingford Road roundabout. Harrison Way is subject to a 40mph speed limit near to St Ives town centre, and the national speed limit (60mph) between the roundabout with the A1123 and the roundabout with Meadow Lane. Harrison Way is approximately 7.0m wide. A shared cycle/footway is located on one side of Harrison Way for a majority of its length.

Baseline Traffic Data Collection

- 4.51 Traffic count survey data has been collated from existing sources as well as newly commissioned traffic count surveys. Additional surveys will be undertaken in advance of the planning submission as scoping discussions develop.
- 4.52 These surveys, combined with appropriate TEMPRO growth factors, will be used to inform the traffic flows used in this ES, in addition to specified committed developments agreed as part of the TA Scoping discussions.

Methodology & Scope

- 4.53 The TA will present survey data on existing traffic flows in the vicinity of the Assessment Site, and predictions of traffic flows on completion of the Proposed Development based upon the TRICS database. The data will be used to assess the likely impacts of the Proposed Development on road junctions and will form the basis of predictions of impacts on air quality and noise.
- 4.54 The potential environmental impacts that might arise from a change in traffic flows due to the Proposed Development such as: severance; driver delay; pedestrian delay; pedestrian amenity; fear and intimidation; and, accidents and safety, will be considered and assessed with regard to the Institute of Environmental Assessment guidance notes entitled 'Guidelines for the Environmental Assessment of Road Traffic' and the Department for Transport's 'Guidance on Transport Assessments'.

4.55 Table 4.3 below presents a summary of the scoping process, identifying which likely environmental effects have been scoped in (i.e. those which are considered significant) and out of the assessment during both the demolition/construction and completed development phases, and the assessment methodology which will be used to assess the likely significant effects.

Table 4.3: Transport and Access Scope

Likely Significant Effect	Scoped in (✓) or out (✗)	Reason	Assessment Methodology
Construction Phase			
Effects on Severance	✓	Temporary road closures or diversions due to construction could be required. Also, vehicles (including HGVs) will be generated during the construction period. Therefore, effect of construction vehicles on transport network needs to be considered.	Guidelines for the Environmental Assessment of Road Traffic – Institute of Environmental Management and Assessment.
Effects on Driver Delay	✓		
Effects on Pedestrian Delay	✓		
Effects on Pedestrian Amenity	✓		
Effects on Fear and Intimidation	✓		
Effects on Accidents and Safety	✓		
Effects on Hazardous Loads	✗	No hazardous loads expected during construction based on mix of uses proposed.	
Effects on Dust and Dirt	✗	Refer to findings of Air Quality Assessment and Air Quality EC Chapter.	
Completed Development			
Effects on Severance	✓	Highway/Access Improvements.	Guidelines for the Environmental Assessment of Road Traffic – Institute of Environmental Management and Assessment.
Effects on Driver Delay	✓	Changes in traffic flow/activity on highway network.	
Effects on Accidents and Safety	✓		
Effects on Fear and Intimidation	✓	Changes in traffic flow/activity on highway network.	
Effects on Pedestrian Amenity	✓	Increased pedestrian / cycle activity.	
Effects on Pedestrian Delay	✓		
Effects on Hazardous Loads	✗	No hazardous loads expected during operation based on mix of uses proposed.	
Effects on Dust and Dirt	✗	Refer to findings of Air Quality Assessment and Air Quality EC Chapter.	

Geographical Scope

4.56 The study area has been defined on the basis of the IEMA Guidelines for the Environmental Assessment of Road Traffic (Guidance Note No. 1). The IEMA Guidelines recommend two rules to be considered when assessing the impact of development traffic on a highway link:

- Rule 1: Include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%); and
- Rule 2: Include any other specifically sensitive areas where traffic flows have increased by 10% or more.

- 4.57 The above guidance is based upon knowledge and experience of environmental effects of traffic, and also acknowledges that traffic forecasting is not an exact science. The 30% threshold is based upon research and experience of the environmental effects of traffic, with less than a 30% increase generally resulting in imperceptible changes in the environmental effects of traffic. At a simple level, the guidance considers that projected changes in traffic flow of less than 10% create no discernible environmental effect, hence the second threshold as set out in Rule 2.
- 4.58 Notwithstanding the above rules, it is considered pertinent at this stage to identify a preliminary study area which will include the following areas, links and junctions in relation to identification of potential adverse effects. Comments have been received from Cambridgeshire County Council as the Local Highway Authority (LHA) upon the scope of the TA - see **Appendix 3**. The following junctions and links will be included within the study area:

- Junctions
 - Marley Road/ B1040 Roundabout
 - A1123 St Audrey Ln / B1040 Somersham Road Roundabout
 - A1123/ Ramsey Road signalised junction
 - A1123/ Needingworth High Street roundabout
 - Stocks Bridge Way/ A1123/ A1096 Harrison Way roundabout
 - A1096 Harrison Way/ St Ives Business Park roundabout
 - A1096 Harrison Way/ Meadow Lane/ The Quadrant Roundabout
 - A1096 Harrison Way/ Station Road/ The Busway Signalised Junction
 - Low Road / 1096 Harrison Way/ Roundabout
 - A1123/ Houghton Hill Road/ B1090 Sawtry Way priority junction
 - A1123 / Garner Drive signalised junction
 - A1123 / Hill Rise signalised junction
 - A141 / Huntingdon Road roundabout
 - A141 / A1090 roundabout
- Links
 - Marley Road
 - St Audrey Lane (east of junction with Broad Leas)
 - A1123 east of St Ives (east of existing site access)
 - Houghton Road
 - B1090 (between A141 and Houghton Road)
 - A1096 Harrison Way (south and north of busway)
 - A1096 London Road (north of A14 J26)

Temporal Scope

- 4.59 The temporal scope of the transport and movement assessment is proposed to be:
- Construction of Proposed Development – construction of the Proposed Development is anticipated to begin in 2021, subject to obtaining relevant planning consents. The most onerous construction phase is yet to be determined, however in terms of traffic management impact, this is likely to be during construction of the primary site access junction, in the first phase. In terms of impact generated by the quantum of construction traffic accessing the site, this is likely to be later when construction traffic combines with operational traffic. It is therefore proposed to assess the construction effects of the proposed development for an assessment year of 2023 to allow for a combination of operational and construction traffic.
 - Completion of Proposed Development – the Proposed Development is anticipated to be completed in 2031, and therefore it is proposed that operational effects are assessed for this year plus five years beyond (2031) to match the Local Plan period i.e. 2036.

Development Traffic Generation Scope

Construction Traffic

- 4.60 Peak construction traffic predicted to be generated by the Proposed Development will be calculated using a first-principles approach. This will be based on the likely worst-case construction scenario, which is expected to be during delivery of the first phase of housing and delivery of the first site access.

Operational Traffic

- 4.61 Peak hour traffic flows that will be generated by the Proposed Development once fully occupied will be calculated as per the methodology outlined in the TA Scoping Note.
- 4.62 Daily vehicle trip profiles will be extracted for each land use from the TRICS database, for both weekdays and the calculated peak hour operational traffic flows will be factored to 18 hour AAWT and 24 hour AADT.
- 4.63 As noted above, the development operational traffic flows, along with baseline traffic flows, collected through traffic counts, will be used to determine the environmental impacts of the Proposed Development in terms of transport during the operational phase.
- 4.64 Due to the outline nature of the scheme, a detailed construction programme/methodology is unlikely to be available at the planning submission stage. Estimates relating to the volume of construction traffic during the works will therefore be determined using high level estimates based on anticipated total project costs in addition to the use of similar scale sites as a proxy.
- 4.65 Given that CSRM2 (which takes into account re-distribution of traffic on the local network due to major committed highways and development schemes) will not be made available to developers, PBA propose to use base traffic flow data taken from recent and new traffic surveys and apply TEMPRO growth to this base data along with specifically identified committed development traffic (as per TA Scope).
- 4.66 As CSRM2 will not be made available to developers, it will not be viable to take into account the redistribution of traffic due to the major A14 upgrade works. However, the committed A14 Cambridge to Huntingdon improvement scheme is predicted to significantly reduce traffic along the existing A14 in the vicinity of the site. The traffic generated by the Proposed Development that will route along this link is expected to be significantly outweighed by this reduction in traffic. Therefore, it is considered that the proposed development will have no adverse environmental effects on the existing A14 and any surrounding sensitive receptors, compared to the existing situation. Consequently, it is proposed to scope out any assessment of the existing A14.

Potential Mitigation Measures

- 4.67 There will be a variety of inherent mitigation designed into the development, which may include but will not be limited to:
- new and/or improved walking and cycling connections connecting the site to local amenities;
 - new and/or improved public transport connections through and alongside the site;
 - highway capacity enhancements at junctions along Harrison Way, the A1123, and A141
- 4.68 It is envisaged that a Construction Environmental Management Plan (CEMP) will be implemented and that this will define:
- Construction traffic routing
 - Hours of operation
 - Requirements for the various contractors to co-ordinate activities to ensure the construction activities with high HGV generation do not occur together
- 4.69 A FTP will also be prepared for the Proposed Development. This is likely to include potential measures to be implemented to reduce car dependency and to encourage travel by sustainable modes. The FTP will form the basis of full Travel Plans for the development, to be prepared at the reserved matters application stages.

Air Quality

- 4.70 A chapter will be prepared setting out the findings of an Air Quality Assessment (AQA). The AQA will cover two potential air quality issues:
- The impact of the Proposed Development on the surrounding area, during both the construction and operational phases; and
 - The impact of existing local pollution sources on the Proposed Development itself.
- 4.71 Existing local air quality, the likely future air quality in the absence of the Proposed Development, and the likely future air quality if the Proposed Development goes ahead, will all be defined. The assessment of construction impacts will focus on the anticipated duration of works. The assessment of operational impacts will focus on road traffic emissions for the earliest year that the Proposed Development is likely to be operational in order to provide a worst case assessment.
- 4.72 A qualitative assessment will also be undertaken of the potential for adverse odour impacts arising from the nearby sewage treatment works and poultry farm.

Baseline Conditions

- 4.73 Huntingdonshire District Council (HDC) monitors local air quality as required by legislation and reviews this against the objectives set out by the Air Quality Regulations. There are currently four Air Quality Management Areas (AQMA) in HDC, the closest of which is the Huntingdon AQMA which is over 7 km from the proposed Assessment Site.
- 4.74 Existing local air quality will be defined within the study area drawing upon monitoring carried out by HDC with the information provided within its Air Quality Review and Assessment reports. A 6-month monitoring program has also been carried out by Peter Brett Associates at a number of locations around the Assessment Site in order to gain a better understanding of the baseline air quality concentrations at the site.
- 4.75 The St Ives sewage treatment works is approximately 350 metres to the west of the Assessment Site and there are existing residential properties in close proximity to the works. There is a modern poultry farm to the west of Somersham Road at the northern boundary of the site.

Methodology & Scope

- 4.76 The principal air pollutants of concern with respect to the Proposed Development will be:
- nitrogen dioxide;
 - fine airborne particles (PM₁₀ and PM_{2.5});
 - dust.
- 4.77 The main local sources of these pollutants are likely to be road vehicles (nitrogen dioxide, PM₁₀ and PM_{2.5}) and construction activities (dust and PM₁₀). Professional experience suggests that any impacts associated with other air pollutants will be negligible.
- 4.78 Air quality will be assessed at a range of worst-case receptors. Dust and particulate matter associated with construction will be assessed with reference to the Institute of Air Quality Management's Guidance on the Assessment of Dust from Demolition and Construction (February 2014), which is accepted as industry standard guidance on this subject. For traffic-related impacts these will be the existing and Proposed Development and sensitive ecological sites that are closest to roads, in particular those close to junctions, where traffic emissions are greatest.
- 4.79 The assessment of operational road traffic impacts will be undertaken using the ADMS Roads detailed dispersion model. The model will be used to predict concentrations within the Assessment Site to assess the suitability of the site for the Proposed Development and also at off-site receptors to assess the impacts of additional traffic associated with the Proposed Development. Model outputs will be verified against local monitoring data. This modelling will make use of mapped background concentration data provided by Defra and of traffic flow projections. Air quality will be assessed in relation to the national air quality objectives,

established by the Government to protect human health. Air quality impacts arising from road traffic will be assessed with reference to guidance issued by the IAQM and Environment Protection UK (EPUK) in their document: Land-use Planning & Development Control: Planning for Air Quality. The Environmental Health officer at HDC will be consulted concerning detailed aspects of the proposed methodology.

- 4.80 The methodology will enable quantitative predictions of ambient air pollution levels for the following scenarios:
- Scenario 1: Baseline;
 - Scenario 2: Opening Year without the Proposed Development;
 - Scenario 3: Opening Year with the Proposed Development.
- 4.81 There are three Sites of Special Scientific Interest (SSSI) in the vicinity of the site, the Berry Fen SSSI located approximately 4.5 km to the east of the site, the Ouse Washes SSSI located approximately 6 km east of the site and the Houghton Meadows SSSI located 2.7 km west of the site. If the increase in traffic on the roads within 250 m of a SSSI exceeds 1,000 AADT, a detailed assessment of the air quality impacts of the Proposed Development will be carried out.
- 4.82 A qualitative assessment of odour impacts will be undertaken in accordance with the IAQM document 'Guidance on the assessment of odour for planning'.

Ground Conditions

- 4.83 Information on the ground conditions at the site and in the surrounding area has been obtained and reported upon in the following documents:
- Phase 1 Ground Conditions Assessment (Desk Study) by Peter Brett Associates LLP, June, 2016; and
 - Soil Infiltration Assessment by Peter Brett Associates LLP, July 2016.

Baseline Conditions

Land Use

- 4.84 The Assessment Site comprises farm land under mixed arable and pasture production that is crossed by tracks and drains and includes two farm yard areas (Bridge Close Yard and Gifford's Farm), generally containing barns and outbuildings used for storage, and three residential properties adjacent to the Gifford's Farm yard. The site is bordered to the south by the A1123 road, to the west by the B1040 road, to the east and north by surface water drains. At Gifford's Farm three small above ground fuel storage tanks (ASTs) are present and at both Gifford's Farm and Bridge Close Yard small areas of burning associated with bonfires were observed.
- 4.85 The Assessment Site is surrounded by agricultural land to the north and south, by a golf course to the east, by of farm land and light industrial estates to the west and light industrial estates to the south-west.

Historical Land Use

- 4.86 The Assessment Site history is one of agricultural usage generally with the exception of the far south-eastern corner of the site that was crossed by a railway line between the 19th and late 20th centuries. The surrounding area was generally farm land with occasional small scale industrial uses historically.

Geology

- 4.87 Geological mapping shows that the Assessment Site is underlain by bedrock strata of the West Walton Formation & Ampthill Clay Formation (undifferentiated) generally and deposits of the Oxford Clay Formation along the southern and south-western boundaries of the site. All three of these formations typically comprises mudstones and siltstones that weather near surface to clays and this was confirmed by historical boreholes sunk on the site and by trial pits excavated on the site that recorded gravelly or sandy clays.
- 4.88 The bedrock geology is overlain over part of the south-eastern quadrant of the Assessment Site by River Terrace Deposits. The trial pits sunk on site did not encounter any River Terrace Deposits, however, the

records of two historical boreholes sunk on the site record them as comprising 1.65m of ‘gravel’ and 1.8m of ‘clayey sandy silt’.

- 4.89 The geological setting and geological formations present on the Assessment Site are not considered to be distinctive or rare in any way and are considered to be typical of the region. Review of the Natural England web-based interactive ‘Nature on the map’ database and the Joint Nature Conservation Committee (JNCC) web-based UK Geological Conservation Review database indicates that there are no important geological sites, including geological SSSI’s, within 5km of the Assessment Site.

Hydrogeology

- 4.90 The West Walton, Amptill Clay and Oxford Clay Formations are all classified as Unproductive Strata (formerly Non Aquifers) and the River Terrace Deposits as a Secondary A aquifer. Secondary A aquifers are permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. These are generally aquifers formerly classified as minor aquifers.

- 4.91 No Groundwater Source Protection Zones are recorded within 1km of the Assessment Site boundaries.

Hydrology

- 4.92 Drains cross the site and run around the northern and southern boundaries of the Assessment Site. The drains are tributaries of the River Great Ouse.

Contaminated Land Risk Assessment

- 4.93 The desk study report identified six on site localised potential sources of contamination with plausible pollutant linkages to potential receptors, these are:

- The railway line that historically crossed south-eastern corner of the site.
- A localised area of burning associated with a small scale bonfire at Gifford’s Farm historically.
- A localised area of burning associated with a small scale bonfire at Bridge Close Yard historically.
- Three small above ground fuel tanks at Gifford’s Farm.

- 4.94 Off-site potential sources of contamination (PSC) were identified but none were deemed to have a plausible pollutant linkage to the Assessment Site.

- 4.95 The risk assessment concluded that the risks to all the potential receptors were generally very low (see Table 4.4 below). Locally, low risks were deemed to exist associated with the very localised On Site PSC as follows:

Table 4.4: Potential Sources of Contamination

Potential Receptor	Risk Classification
Human Health Current Users (Residential Properties/ Farm Workers)	Very Low Generally Locally Low
Human Health Future Users (Residential Properties)	Very Low Generally Locally Low
Human Health Off-Site (Residential Properties)	Very Low
Human Health Construction Workers (During Redevelopment)	Very Low Generally Locally Low
Groundwater (On Site Secondary Aquifer)	Very Low
Surface Water (On Site drain tributaries of River Great Ouse river)	Very Low
Property and Buildings (On Site and Off site)	Very Low

- 4.96 Prior to the commencement of development a programme of geo-environmental ground investigation work will be carried out at the Assessment Site followed by further tiers of geo-environmental risk assessment and if necessary remediation of any identified contamination. Such work, which will be carried out under the oversight of the HDC contaminated land team is enforced through the planning process. It will confirm that the

site can be developed and/or that remediation of any sources of contamination is required before development to eliminate or reduce the risks to potential receptors.

Ground Instability Risk

- 4.97 The desk study report concluded that the Assessment Site is at a Very Low to No Risk of being affected by geological hazards generally, including; collapsible ground, compressible ground, slope instability and natural and mining cavities.
- 4.98 The study concluded that those parts of the Assessment Site directly underlain by the West Walton, Ampthill Clay and Oxford Clay Formations or where they are close to the surface are at a moderate risk of shrinking or swelling clay ground instability.
- 4.99 In the UK design and construction protocols to manage risk of shrinking or swelling of the ground on clay soil sites are well established and are detailed in NHBC Technical Standards and published guidelines produced by the Building Research Establishment. Adherence to these published Technical Standards and guidelines should ensure no increased short, medium or long term risk to the identified receptors occurs as a result of the Proposed Development.

Conclusions

- 4.100 From review of the available information and due to the embedded mitigation measures that will be employed, it is considered that development of the Assessment Site will result in:
- No detrimental impact upon Geodiversity.
 - No detrimental impact upon Ground Stability either on or off the Assessment Site.
 - No detrimental impact from Land Contamination either on or off the Assessment Site and if contamination is present on the Assessment Site the necessary remediation of the contamination will actually have a beneficial impact on land contamination.
- 4.101 Therefore, it is considered that Geodiversity, Ground Stability and Land Contamination (i.e. 'Ground Conditions') can be scoped out the EIA for the Assessment Site.

Acoustics (Noise & Vibration)

- 4.102 The assessment will address the likely significant environmental effects of the construction and operational phases of the Proposed Development on the acoustics climate of the surrounding area. In particular, it will consider the likely significant environmental effects of the existing and future acoustics climate on the proposed application site, the effect of noise from the application site on the existing and future acoustic climate and the effect of construction noise and vibration on existing and proposed noise sensitive receptors.

Baseline Conditions

- 4.103 A baseline sound survey has been undertaken to establish the prevailing sound climate across the site. Following consultation with Huntingdonshire District Council (HDC) the results of the survey will form the basis of an assessment of the Assessment Site's suitability for the Proposed Development.
- 4.104 During the surveys, the existing sound climate was dominated by road noise from the A1123 and the B1040. Noise from Arena Structures' open air warehouse, where temporary event structures are stored and delivered in and out, is also audible on site during the day.
- 4.105 A computer noise model of the site and surrounding areas will be prepared using industry standard software SoundPLAN version 7.4. The noise model will be used to evaluate the noise climate across the site.

Methodology & Scope

- 4.106 The extent of the assessment is summarised below:
- The assessment will consider the noise and vibration effects associated with the Proposed Development during the construction and operational phases. The assessment will include the effects of existing noise

climate to the proposed uses of the Assessment Site and the effects of noise and vibration generated by the Proposed Development on surrounding receptors.

- The likely impact and associated significance will be determined with reference to most appropriate national and local policy, industry standards and guidelines.
- The likely noise and vibration impacts of construction works will be provided through a predominantly qualitative assessment at representative locations around the Assessment Site.
- The effect of the noise from vehicular movements (both existing and future) on the surrounding road network will be assessed at noise sensitive receptors. The assessment will consider the potential for noise disturbance from the Proposed Development to noise sensitive receptors in the vicinity of the site. The assessment will highlight suitable mitigation measures where necessary.
- Drawing on the appropriate guidance and the requirements of HDC, noise from fixed plant and building services associated with the Proposed Development will be assessed to minimise adverse impacts.
- Where appropriate, mitigation measures will be proposed to minimise the impact of the Proposed Development. The residual noise and vibration impacts, after the implementation of the mitigation measures will be identified and their significance assessed.

Socio-Economics

- 4.107 The consideration of socio-economic conditions within the context of the ES will cover issues such as demographic changes and economic effects, which are generally considered to be medium and long term effects. The ES will also provide an assessment of the effects of the Proposed Development on a range of community facilities and in the context of national and local planning policies and guidance. The analysis will consider the demographic circumstances of the local area and establish the existing levels of provision for a range of facilities and services in the vicinity of the Assessment Site. The potential impact arising from the Proposed Development will be considered, whilst accounting for facilities which will be provided as part of the scheme. Finally, a section on mitigation will be provided, which will set out a number of measures that are designed to bring forward socio-economic and community benefits and ameliorate potential adverse impacts.

Baseline

- 4.108 Baseline information on the socio-economic conditions of the local area will be collated from a variety of sources including:
- National Census (2001) and (2011) and other ONS sources
 - NOMIS labour market statistics
 - Indices of Multiple Deprivation
 - NHS Choices data (2015)
 - Edubase (2015)
- 4.109 These will provide information on existing socio-economic conditions. However, it must be acknowledged that social and community circumstances are often complex and interrelated. Consequently, they may be difficult to characterise or measure in a precise way. As a result, some judgements are necessarily subjective.
- 4.110 The following are considered to be potential receptors of socio-economic effects from the Proposed Development and will be considered under the following headings:
- Population;
 - Economy and employment;
 - Housing;
 - Community facilities & services, e.g. schools, health and open space;
 - Crime and public safety.
- 4.111 The baseline will include the economic and population receptors, as well as existing relevant infrastructure serving and workforce, such as economic activity, unemployment rates, skills and qualifications, occupations, business sizes and sectors. It will also assess the characteristics of the existing population e.g. age, household composition, deprivation, health status and local crime rates.

- 4.112 In addition, the baseline will also consider the current provision of community facilities required by the population, such as capacity of primary and secondary schools, GPs and other health services, and open space.

Previous Assessment

- 4.113 There is no previous assessment relevant to this site.

Methodology & Scope

- 4.114 There is no specific guidance in relation to the methodology used to assess potential impacts on socio-economic receptors. The application of the assessment will be specific to the characteristics of Proposed Development, i.e. that it will provide housing, a new population (along with demand for education, health and community services), a new workforce and employment opportunities.
- 4.115 Relevant socio-economic receptors (e.g. employment, primary healthcare, and schools) will be described through reviewing baseline socio-economic conditions in the local area. This will be largely through desk-based research and consultation with relevant stakeholders.
- 4.116 The methodology for assessing economic impacts will involve the following elements:
- An analysis of the current state of the local economy including key sectors, unemployment and general trends in employment provision;
 - An assessment of the provision for of housing and other land uses included within the Proposed Development; and
 - The indirect effects it may have on the local economy and during construction.
- 4.117 The methodology for assessing social impacts will involve the following elements:
- Presentation of data relating to the existing demographic profile and provision of services and facilities, e.g. schools, health facilities, open space and crime;
 - Assessment of the likely effects of the Proposed Development based on available evidence.
- 4.118 A quantitative assessment will be carried out of each relevant receptor. However, as noted above, due to the complexity of socio-economic issues and the numerous interactions that can occur with neighbouring and more distant communities, it is not always possible to predict the precise nature or scale of each impact. Consequently, a qualitative assessment will also be used where necessary.
- 4.119 This will result in an assessment of significance as described in Section 3 above.

Geographical Scope

- 4.120 The study area will be taken as the whole of the District of Huntingdonshire. This broader area will be taken as a wide variety of socio-economic data is collected and reported at this level. However, reference may need to be made to wider areas, e.g. in relation to secondary education; or to smaller areas, e.g. GP surgery and primary school catchment areas to assess capacity and to inform a quantitative assessment of the effect of the demand that would be generated by the Proposed Development. As necessary, comparative data will be provided at a national level, in order to clarify the broader significance of the findings.

Temporal Scope

- 4.121 Potential impacts and effects upon socio-economic receptors will also be assessed in relation to temporary or permanent impacts. Temporary impacts will relate to the construction phases of the Proposed Development and permanent impacts to the occupation and operational phases.

Potential Environmental Impacts and Effects

- 4.122 Potential impacts are likely to relate to:
- The number of new construction jobs created;

- The number of new jobs as a result of the new employment spaces, including the schools, hotel, supermarket and local centre, provided in the Proposed Development;
- The potential impacts of the additional workforce occupying the new housing in Proposed Development on the local employment market;
- The potential impact of the additional household spend from new residents of the Proposed Development and the resulting induced employment;
- The potential demand from new residents of the Proposed Development for primary and secondary school places;
- The potential demand from new residents of the Proposed Development for health services and other public services;
- The potential demand from new residents of the Proposed Development for retail services;
- Potential effects on crime and disorder of the Proposed Development.

Construction

- 4.123 Construction of the Proposed Development would take place over an estimated period of 10 years and would provide employment in a range of trades and professions in the construction industry. It would also have an indirect economic effect through the sourcing of building materials, services and supplies as well as local spending by construction workers.
- 4.124 The potential for local businesses and residents to be adversely affected by construction traffic will be considered as part of the assessment of transport impacts. However, it is anticipated that disruption during construction would be controlled and managed through implementation of a Construction Environmental Management Plan (CEMP).
- 4.125 The Proposed Development is anticipated to be phased. This will be undertaken to ensure that essential infrastructure and services are delivered so that those who occupy the Proposed Development in its early phases are adequately served.

Occupation

- 4.126 There are a number of operational effects that will arise from the Proposed Development. These include the delivery of new homes including affordable housing. An increase in the local population will lead to an associated increase in expenditure within local shops, businesses and services. The new population would also require school places, access to GP services, open space and recreation facilities. An increase in the local population also has the potential to result in a corresponding increase in incidences of crime and fear of crime.

Mitigation

- 4.127 Disruption during construction would be controlled and managed through implementation of a CEMP.
- 4.128 As noted above, the phasing of the Proposed Development will be planned in such a way as to ensure that essential infrastructure and services are delivered so that those who occupy the Proposed Development in its early phases are adequately served.
- 4.129 The Proposed Development will incorporate the principles contained in the publications Secured by Design and Designing out Crime.

5. ENVIRONMENTAL STATEMENT

Structure of Environmental Statement

- 5.1 The ES will provide the information specified under Schedule 4 of the EIA Regulations 2017 and will be carried out with regard to best practice. The environmental effects of the topics identified in the previous section will be assessed.
- 5.2 The findings of the EIA will be set out in the ES which will comprise three volumes as follows:
- Volume 1 – Main Technical Studies;
 - Volume 2 – Appendices and Figures to the Main Technical Studies; and
 - Volume 3 – Non-Technical Summary.
- 5.3 We set out below the likely structure of the Environmental Statement.
1. Introduction
 2. Application Site & Project Description – including identification of sensitive receptors
 3. Policy Context & Alternatives – including consideration of alternative sites and alternative layouts
 4. EIA Methodology
 5. Soils and Agricultural Land
 6. Archaeology and Cultural Heritage
 7. Ecology
 8. Flood Risk and Drainage
 9. Landscape and Visual Impact
 10. Transport and Access
 11. Air Quality
 12. Acoustics - Noise and Vibration
 13. Socio-Economics
 14. Significant Effects – including cumulative and interactive effects
 15. Conclusions
- 5.4 The proposed structure of each of the Topic Chapters is as follows:
- Introduction
 - Planning Policy Context
 - Assessment Methodology
 - Baseline Conditions
 - Likely Significant Effects
 - Mitigation Measures
 - Residual Effects
 - Cumulative Effects
 - Summary
- 5.5 In addition, the Outline Planning Application will be supported by the following documents:
- Design and Access Statement;
 - Relevant drawings, including Site Location Plan, Masterplan, Landscape Masterplan
 - Planning Statement
 - Statement of Community Engagement;
 - Phase 1 Ground Conditions
 - Topographic Survey
 - Services & Utilities;
 - Energy Statement; and,
 - Waste Strategy

Project Programme

5.6 We have made the following assumptions about the timetable in terms of the delivery of the Proposed Development, although it is noted that the target timescale for determination of the Outline Planning Application (as EIA Development) is typically four months and we would therefore be seeking determination as close to this timeframe as is reasonably practicable.

- Submission of Outline Planning Application – Q3 2018;
- Determination of Outline Planning Application – Q3 2019 (12 months);
- Complete Site Marketing/Sale of Land Parcels – Q2 2020 (6 months);
- Complete Discharge of Conditions – Q2 2021 (12 months)
- Project Start – Q2 2021 (6 months);
- First Completions – Q4 2021;
- Delivery over 10 years (at approximately 175 dwellings/year)
- Project Completion - 2031

EIA Project Team

5.7 The following consultants have been appointed for the EIA element of the planning process.

- Planning – Carter Jonas LLP
- Masterplanning – FPCR
- Soils and Agricultural Lane – Land Research Associates
- Archaeology and Cultural Heritage – Orion Heritage Ltd
- Ecology – FPCR
- Flooding and Drainage – Peter Brett Associates
- Landscape & Visual Impact – FPCR
- Transport – Peter Brett Associates
- Air Quality – Peter Brett Associates
- Ground Conditions – Peter Brett Associates
- Acoustics (Noise and Vibration) – Peter Brett Associates
- Socio-Economics – Carter Jonas LLP

APPENDIX 1: ES SCREENING ADVICE REQUEST LETTER (11TH DECEMBER 2017)

One Station Square
Cambridge
CB1 2GA
T: 01223 368771

Gavin Sylvester
Development Management Team
Huntingdonshire District Council
Pathfinder House
St Mary's Street
Huntingdon
PE29 3TN

Your ref:
Our ref: 4209988v1

11th December 2017

Dear Gavin,

THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 – REGULATION 6 SCREENING OPINION

LAND AT GIFFORD'S FARM, ST IVES, HUNTINGDONSHIRE

Please accept this letter as a request for the Council to adopt a 'Screening Opinion' as to the need for an Environmental Impact Assessment (EIA) of a proposed development at the above site in accordance with Regulation 6(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

You will see from the explanation set out below that our interpretation of the Regulations is that the development proposals for the land at Gifford's Farm, St Ives (parish of Holywell-cum-Needingworth) constitutes 'Schedule 2 Development'.

To comply with the requirements of the Regulations, this Screening Request is accompanied by the following:

- Site Location Plan (drawing no.6949-L-01) identifying the extent of the site boundary in red;
- Parameters Plan (drawing no.6949-L-03 Rev A)
- Illustrative Masterplan (drawing no.6949-L-02 Rev E) setting out details of the proposed development.

I refer to our recent exchange of e-mail and write to submit a formal application for pre-application advice for a proposed mixed use development on 128.8 Ha of land at Gifford's Farm to the east of St Ives.

The Site

The site is situated to the north east of the market town of St Ives in the District of Huntingdonshire. St Ives is a substantial and well served settlement with a population in excess of 16,000. Its historic core is focused about the riverside and is defined by a Conservation Area. There are listed buildings throughout the town, albeit none within close proximity of the site.

The site itself comprises primarily arable agricultural land of grades 3a (58%) and 3b (42%) situated east of Somersham Road which provides the western boundary to the Somersham Road industrial estate; and north and east of the Compass Point Business Park, a modern office focussed employment area; and west of the St Ives (Hunts) Golf Club. There are a number of associated agricultural buildings, including a farm house and cottages, located broadly centrally

within the site at grid reference TL 32725 72510. The site is not considered to be sensitive in terms of landscape quality or biodiversity. There are no public rights of way crossing it.

To the north of the Somersham Road / Marley Road junction, the site encompasses property (including businesses and housing) that front Somersham Road. Access to the farm and the land is currently taken directly from the A1123.

The Proposed Development

The proposal is for a sustainable mixed use urban extension of St Ives. The scheme will comprise the following principal elements:-

- Up to 1,750 new dwellings, including affordable housing;
- An Extra Care / Care Home;
- Employment;
- A 3 Form Entry Primary School;
- Budget hotel;
- Supermarket;
- Health care provision;
- Neighbourhood Centre;
- A site for the relocation of St Ives FC;
- Green infrastructure, including Public Open Space, a Sustainable Drainage System and Structural Landscaping.

The development is anticipated to be developed in two phases as illustrated on the accompanying drawings and in the following table.

Development	Phase 1	Phase 2	Notes
Housing (C3)	850 dwgs	900 dwgs	Phase 1 21 Ha & Phase 2 24.9 Ha
Extra Care / Care Home (C2)	0.70 Ha	-	80 beds up to 5,100sq.m GIFA
Employment (B1c)	0.63 Ha	0.72 Ha	Up to 4,250sq.m. GIFA
Employment (B8)	0.63 Ha	0.72 Ha	Up to 4,250sq.m. GIFA
Primary School (D1)	3.00 Ha		3 FE
Hotel (C1)	0.40 Ha	-	100 rooms up to 3,250sq.m GIFA
Supermarket (A1)	1.05 Ha		Up to 2,800sq.m GIFA
Health Care (D1)	0.35 Ha		Up to 1,350sq.m GIFA (area allows for surgery and pharmacy)
Neighbourhood Centre (A1, A3, A4, A5,C3)	0.60 Ha		Up to 1,000sq.m GIFA (residential apartments above)
Relocation site for St Ives FC		3.9 Ha	
Green Infrastructure		66.95 Ha	Public Open Space, SuDS, Structural Landscaping
Access and Spine Road		3.25 Ha	Proposed vehicular access and spine road zone

Need for Environmental Assessment

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the Regulations) were made on 18th April 2017 and came into force on 16 May 2017. The Regulations provide descriptions of development and applicable thresholds and criteria for the purposes of the definition of 'Schedule 2 Development'. We conclude that the scheme falls within the category of projects in Schedule 2 [10b] 'Urban Development Projects'. Schedule 2 indicates that where the development exceeds the following thresholds it is necessary to consider whether an EIA is required.

- i. includes more than 1 hectare of urban development which is not dwellinghouse development; or
- ii. the development includes more than 150 dwellings; or
- iii. the overall area of the development exceeds 5 hectares.;

In light of the above, it is necessary for Huntingdonshire District Council to formally consider whether the proposed development is likely to give rise to significant effects on the environment and so be 'EIA development'.

The Government's Planning Practice Guidance provides thresholds above which an EIA is likely to be necessary. For 'Urban Development Projects' EIA is more likely to be required on sites which have not previously been intensively developed where:

- i. the area of the site is more than 5 hectares; or
- ii. it would provide a total of more than 10,000 sq.m. of new commercial floorspace; or
- iii. the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).

Brief Review of the Likely Effects on the Environment

This section provides an initial outline of the baseline conditions for the site and the potential effects which may arise as a result of the development.

Soils and Agriculture

The site comprises thirteen fields that are primarily in arable agricultural use. The land is level to gently sloping and survey work has found it to be of grades 3a and 3b of the MAFF agricultural land classification system. The land that is not in arable use is utilised for grazing purposes. The land is not registered under any agri-environment schemes. The proposed development will result in the loss of the site to agricultural purposes.

Archaeology

The site has been the subject of a heritage desk based assessment, a geophysical survey and archaeological evaluation trenching. These studies have established that there is a relatively large Roman settlement site located in the south eastern area of the site, with a smaller area of Iron Age remains on the west side of Gifford's Farm buildings and also in the central north eastern area of the site. The proposed development will impact upon these remains. There are no designated heritage assets located near the proposed development site.

Landscape & Visual Impact

The site and its immediate landscape context are not subject to any national, local or other landscape designations. The site does not fall within a Special Landscape Area nor does it fall within an Area of Outstanding Natural Beauty. The site is presently used as agricultural land with associated farm buildings and infrastructure. The surrounding context to the west and south west is a mixture of employment and commercial land uses with some residential. The St Ives (Hunts) Golf Club is located to the east and north east of the site boundary and the wider context to the north and east is arable farmland. The site has a semi-urban character to its southern and western boundaries where existing settlement edge exerts an influence. The eastern and north eastern portions are influenced less by the settlement edge, although aspects of settlement edge remain visible.

The landform of the area falls away in gentle undulations towards the River Great Ouse as it passes to the south of St Ives. The site itself has gentle undulations providing changes in height, but overall it experiences a north to south fall which provides a slight southerly aspect. The site does not include landscape features of notable value and has a lack of substantive tree cover or trees. Hedgerows are fragmented and typically follow drainage ditches that define the large-scale geometric field pattern. The site is generally of unremarkable character and is influenced by the adjacent urban area.

The visual envelope of the site is contained by topography to the north, vegetation to the east and employment uses to the south and south west. Views towards the site are primarily limited to places of work, adjacent roads and the golf course to the east. The site is not publically accessible.

Potential landscape and visual effects are expected to be localised in nature.

Ecology

No statutory designated sites of international, national/regional or local nature conservation importance have been identified within 5, 2 or 1km of the site, respectively. No non-statutory designated sites of nature conservation importance are located within or immediately adjacent to the site. However, Meadow Lane Gravel Pits County Wildlife Site (CWS) is located approximately 430m south of the site and is noted for its standing water, fen and reed bed habitats. The site is also important for its dragonfly populations and nationally scarce vascular plant species.

The Cambridgeshire & Peterborough Environmental Records Centre have provided a number of protected and notable species records from within 1km of the site. These included records of both barbastelle *Barbastella barbastellus* and natterer's bat *Myotis nattereri*, badger *Meles meles*, hedgehog *Erinaceus europaeus*, otter *Lutra lutra* and number of notable moth and butterfly records from Meadow Lane Gravel Pits CWS. A single water vole *Arvicola amphibius* record is present along Parson's Drove Drain which flows south along the western boundary of the site.

An extended Phase I Habitat Survey has established that the site is dominated by intensively managed arable farmland with small areas of improved grassland, semi-mature broadleaved plantation woodland and a single field pond. Hedgerows and ditches form the boundaries of the arable fields with a small number of mature tree stands occurring along the eastern boundary. All hedgerows consisted of at least 80% native woody species and as such are considered to be habitats of principal importance under the Natural Environment and Communities (NERC) Act 2006. No invasive non-native species were recorded during the survey.

Faunal surveys conducted through 2015 and 2016 identified the following:

No evidence of great crested newt has been identified within the waterbodies on the site or those located within 500m of the site boundary and subject to assessment.

Six species of bat, common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, noctule *Nyctalus noctua*, Nathusius pipistrelle *Pipistrellus nathusii*, brown long-eared *Plecotus auritus*, barbastelle and two species groups *Myotis* and *Nyctalus* have been recorded during activity surveys. Areas of peak bat activity generally comprised the northern most field compartment, the farm buildings within the south-centre and the western and eastern boundaries. No evidence of roosting bats was noted in association with any of the mature trees or farm buildings present within the site.

Bird species of conservation status (i.e. Wildlife & Countryside Schedule I, Species of Principal Importance or Red and Amber Birds of Conservation Concern (BoCC) listed species) were recorded during breeding bird and wintering bird surveys respectively. A farmland bird assemblage largely comprising common to widespread species including linnet *Carduelis cannabina* and skylark *Alauda arvensis* were recorded during the surveys. The hedgerows and plantation woodland were found to support a small number of woodland edge species including dunnoek *Prunella modularis* and song thrush *Turdus philomelos*.

No evidence of water vole or otter has been observed in association with the on-site waterbodies, ditches and the Parson's Drove drain forming the western boundary.

As a result of the proposals it is considered that the impacts on any designated sites will be negligible. Whilst it is accepted that the proposals will result in the loss of the majority of the assemblage of farmland bird species from the site, the provision of extensive areas of habitat, in conjunction with the appropriate management, will ensure an overall gain in biodiversity in the long-term.

Flooding & Drainage

The Environment Agency flood map shows the site to be partially within the 1% probability (1 in 100 year return period) floodplain, hence within Flood Zone 3: High Probability. The site is also partially within the 0.1% (1 in 1000 year return period) floodplain, hence within Flood Zone 2: Medium Probability. A large portion of the site (mostly the eastern extent of the site) is identified to be outside the 0.1% probability (1 in 1000 year return period) floodplain, hence within Flood Zone 1: Low Probability.

The masterplan has been developed based on a sequential approach, whereby more vulnerable site uses are located in areas with the lowest risk of flooding, in this case Flood Zone 1. There is no development proposed in Flood Zones 2 and 3 other than water compatible uses, such as public open space and sports facilities.

In accordance with policy, a storm water drainage system that provides Sustainable Drainage (SuDS) measures consistent with the recommendations of NPPF, local SFRA guidance and published documents in the form of CIRIA C753 et al, will be implemented. There are opportunities for wetland habitat creation as part of the SuDS.

In terms of foul drainage, the land lies within the catchment of the St Ives Water Recycling Centre (WRC) which is located approximately 400m west of the site. Anglian Water (AW) has advised in a Pre-Development Report (PDR 2015) that there was insufficient capacity in the WRC to accommodate the foul flows from the full extent of the proposed development. However, AW are obliged to accept the foul flows should planning permission be secured. They would therefore take the necessary steps to ensure that there is sufficient capacity at the WRC. The proposed strategy to

convey the foul flows from the development consists of a pumping station and a rising main that will pump directly towards St Ives Water Recycling Centre (WRC).

There is the potential that the discharge from the WRC may be limited due to existing permits in place by the Environmental Agency (EA). If any other developers in the area have secured capacity in the WRC since issue of the PDR there is the potential that that this permit will need to be reviewed in order to accommodate the proposed discharge from the WRC associated with the scheme. AW has advised that discussions with the EA regarding the extent of the existing permit would be undertaken upon the submission of an underwriting agreement.

Contamination

The site is crossed by tracks and drains and includes two farm yard areas (Bridge Close Yard and Gifford's Farm) generally containing barns and outbuildings used for storage; and three residential properties adjacent to the Gifford's Farm yard. At Gifford's Farm three small above ground fuel storage tanks (ASTs) are present and at both Gifford's Farm and Bridge Close Yard small areas of burning associated with bonfires were observed.

The site's history is one of agricultural use with the exception of the far south-eastern corner of the site that was crossed by a railway line between the 19th and late 20th centuries. The surrounding area was generally farm land with occasional small scale industrial uses.

Geological mapping shows that the site is underlain by bedrock strata of the West Walton Formation & Ampthill Clay Formation (undifferentiated) generally and deposits of the Oxford Clay Formation along the southern and south-western boundaries of the site. All three of these formations typically comprises mudstones and siltstones that weather near surface to clays. The bedrock geology is overlain over part of the south-eastern quadrant of the Site by River Terrace Deposits.

The geological setting and geological formations present on the site are not considered to be distinctive or rare in any way and are considered to be typical of the region. Review of the Natural England web-based interactive 'Nature on the map' database and the Joint Nature Conservation Committee (JNCC) web-based UK Geological Conservation Review database indicates that there are no important geological sites, including geological SSSI's, within 5km of the study site.

The West Walton, Ampthill Clay and Oxford Clay Formations are all classified as Unproductive Strata (formerly Non Aquifers) and the River Terrace Deposits as a 'Secondary A' aquifer. 'Secondary A' aquifers are permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. These are generally aquifers formerly classified as minor aquifers. No Groundwater Source Protection Zones are recorded within 1km of the site boundaries.

A Contaminated Land Risk Assessment has identified six on site localised potential sources of contamination with plausible pollutant linkages to potential receptors, these are:

- The railway line that historically crossed south-eastern corner of the site.
- A localised area of burning associated with a small scale bonfire at Gifford's Farm historically.
- A localised area of burning associated with a small scale bonfire at Bridge Close Yard historically.
- Three small above ground fuel tanks at Gifford's Farm.

Off-site potential sources of contamination (PSC) were identified but none are deemed to have a plausible pollutant linkage to the study site. In conclusion the risks to all the potential receptors is generally very low.

Traffic & Transport

There are currently footpaths located opposite the site that provide a link along Somersham Road and the A1123, which can be used by pedestrians to travel to St Ives Town Centre. There is a good provision of street lighting along this existing footpath. Somersham Road and its speed limit of 40mph creates a safe environment for cyclists. National Cycle Network route 51 is within the vicinity of the site and connects Huntingdon and St Ives to Cambridge. The majority of this section of the route is along a cycle track, part of the Cambridgeshire Guided Busway (but segregated from the busway) and is therefore free from vehicular traffic. The existing cycling infrastructure within the vicinity offers a safe route for cyclists wishing to make inter-urban strategic trips through St Ives and beyond.

Existing Public Transport

St Ives is served by various bus services, which link several parts of St Ives as well as providing connections to key destinations such as Cambridge, Huntingdon and Peterborough. The closest bus stops to the site are located on St Audrey Lane and Marley Road, 450m (6min walk) and 1000m 1km (12min walk) from the centre of the proposed residential and employment site respectively. A continuous footway (with dropped kerbs where appropriate) is currently provided to both bus stops. These bus stops are served by regular services to Cambridge and Huntingdon.

The nearest rail station is located within Huntingdon which is 9km west of the site. This station provides over 200 cycle parking spaces and over 700 car parking spaces. Trains from Huntingdon regularly depart, every 30 minutes throughout the day starting at 03:40 and running into the evening, to London Kings Cross to the south and Peterborough to the north. Trains start at 03:39 (to Kings Cross) and 06:38 (to Peterborough) and run into the evening. During the evening trains in each direction operate every 30 minutes. Rail provides residents and employees of the proposed development with a sustainable mode of transport for commuting to local destinations, such as St Neots and Hitchin; and also onto London and longer journeys further afield.

Highway Network

Somersham Road is a single carriageway road running from Somersham to where it forms a roundabout junction with St Audrey Lane in the south. At the site boundary, Somersham Road is subject to a 40mph speed limit. A de-restricted speed limit is in force to the north towards Somersham. Somersham Road is approximately 6m wide. There is a footway along the western side of Somersham Road between Marley Road and St Audrey Lane, which varies in width between 1.2 – 2m. One of the two proposed development site accesses will be off Somersham Road at its junction with Marley Road. This access will take the form of a fourth arm off an improved and enlarged version of the existing Marley Road / Somersham Roundabout.

The A1123 is a single carriageway road running from Huntingdon through St Ives to Soham. The development site will take its main access from the A1123 midway between the Harrison Way/ A1123 roundabout and the A1123 Needingworth roundabout. The A1123 at this point is subject to the national speed limit (60mph). A shared cycle/footway is located on the proposed development side of A1123 for its entire length between the site and Needingworth.

Harrison Way is a single carriageway road running from its roundabout junction with the A1123 up to where it becomes London Road at the Low Road/Hemingford Road roundabout. Harrison Way is subject to a 40mph speed limit near to St Ives town centre, and the national speed limit (60mph) between the roundabout with the A1123 and the roundabout with Meadow Lane. Harrison Way is approximately 7.0m wide. A shared cycle/footway is located on one side of Harrison Way for a majority of its length, although there is a gap in pedestrian/cycle provision between the A1123 and Parson Green roundabout.

Mitigation Envisaged

There will be a variety of inherent mitigation designed into the development relating to transport, which may include but will not be limited to:

- New and/or improved walking and cycling connections connecting the site to local amenities;
- New and/or improved public transport connections through and alongside the site;
- Highway capacity enhancements at junctions along Harrison Way and the A1123.

It is envisaged that a Construction Environmental Management Plan will be implemented and that this will define:

- Construction traffic routing;
- Hours of operation;
- Requirements for the various contractors to co-ordinate activities to ensure the construction activities with high HGV generation do not occur together.

Screening

This letter requests the issue of a formal EIA screening opinion by Huntingdonshire District Council. We would be grateful if you could consider the information in this letter prior to issuing the Council's formal screening opinion. Should the Council determine that EIA is necessary, then the applicant will prepare and submit a Scoping Report.

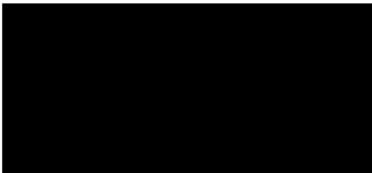
As you will be aware, Regulation 6(6) states that the local planning authority shall adopt a screening opinion within three weeks of the date of a request and we look forward to receiving a response in this timescale.

I should be grateful if you would confirm receipt of this letter and enclosures.

Yours sincerely,



Mark Hyde MRTPI PIEMA
Partner



Encs: as above

APPENDIX 2: ES SCREENING OPINION (19TH JANUARY 2018)



Pathfinder House, St Mary's Street
Huntingdon. PE29 3TN
Development.control@huntingdonshire.gov.uk

01480 388388
www.huntingdonshire.gov.uk

Mr M Hyde
Carter Jonas
6-8 Hills Road
Cambridge
CB2 1NH

Our Ref: 17/70261/SCRE

19th January 2018

Dear Mr Hyde

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

EIA SCREENING OPINION – Proposed development at Land at Gifford's Farm, St Ives, Huntingdonshire consisting of:

- Up to 1750 dwellings
- Extra care/care home
- Employment
- 3 FE Primary School
- Hotel
- Supermarket
- Health Care Provision
- Neighbourhood centre (A1, A3, A4, A5 uses)
- Football club grounds
- Infrastructure.

I refer to the above request for a screening opinion received 13 December 2017.

The Local Planning Authority has considered your request in accordance with regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the "2017 Regulations").

The development proposed above falls within the description at paragraph 10 (b) (Urban Development Projects) of Schedule 2 to the 2017 Regulations and the project exceeds the thresholds in column 2 of the table as follows:

- (i) includes more than 1 hectare of urban development which is not dwellinghouse development.
- (ii) includes more than 150 dwellings
- (iii) exceeds 5 hectares

Planning Practice Guidance advises that Environmental Impact Assessment is more likely to be required for sites which have not previously been intensively developed and where the following indicative criteria and thresholds are exceeded:

- (i) area of the scheme is more than 5 hectares; or
- (ii) it would provide a total of more than 10,000 sqm. of new commercial floorspace; or
- (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).

Having regard to the location and characteristics of the site and its wider surroundings, it is considered that the physical scale of the proposed development project is likely to have significant environmental effects over a wide area.

The Council therefore opines that the development is Environmental Impact Assessment development and the submission of a planning application for the development project must be accompanied by an Environmental Statement.

In accordance with the 2017 Regulations, a copy has been placed on the Planning Register.

If you wish to discuss this matter further, please contact Gavin Sylvester on 01480 387070.

Yours faithfully



Andy Moffat
Head Of Development

APPENDIX 3: TRANSPORT ASSESSMENT SCOPE



Land At Gifford Park, St Ives

Pre-application

SCOPING NOTE

PREPARED BY: Transport Assessment Team

AUTHOR: Jez Tuttle

CHECKED BY: David Allatt

DATE: 9th February 2018

Background

The document reviewed is the Transport & Highways Scope / Draft Transport Assessment For Pre App Submission relating to a proposed Residential/Mixed use development at land known as Gifford Park, St Ives. Please note that CCC comments are focused on the scope only, should the client require a pre-submission review of the full TA this service can be provided. Details of the associated fees are contained on the CCC website.

Scoping note comments

1. Introduction

Para 1.2.6 – CCC would not accept a 'Monitor and Manage' approach to this development. All mitigation measures must be agreed prior to the determination of the Planning Application for the whole site.

2. Policy and Guidance

Para 2.1.1 – A review should also be included of the Huntingdonshire Strategic Transport Study (May 2017).

3. Existing Conditions

Para 3.3.10 – There are currently gaps/barriers in the cycle infrastructure network where facilities are technically sub-standard such as the width of cycleways and crossing points over major roads. Such deficiencies would be expected to be identified in the TA with reference to the need to travel between the site and local facilities and also from residential areas outside the site to the employment/leisure facilities inside the site.

Para 3.3.11 – Again there are currently gaps/barriers to walking and cycling from this site to local amenities such as uncontrolled crossings over major roads. Such deficiencies would be expected to be identified in the TA. Again this should be with reference to the need to travel between the site and local facilities and also from residential areas outside the site to the employment/leisure facilities inside the site.



Para 3.4.7 – Using maximum commuter walking distances to assess the acceptability of distances to bus stops is not acceptable. The maximum distance to bus stops from any dwelling should fall somewhere between 250-400m depending on the quality of the facilities and routing. It would be expected that deficiencies would be addressed possible by the introduction of a new/diverted service through the site.

Section 3.7 – It is unclear as to whether any discussions have been undertaken with CCC or Highways England in respect of junctions to be considered within the study area. It would be expected that the scope would be extended to consider the following junctions on the Local Highway network given the potential volume of vehicle trips from the site.

- A141/St Peters Road roundabout junction, and;
- A141/B1044/Ermine Street roundabout junction.

Highways England may also require junctions on the A14 to be tested, clarification should be given as to whether there have been discussions in this respect.

Para 3.8.1 – Personal injury accident data should be sourced from Cambridgeshire County Council for the network within the study area in order to obtain the latest data. An analysis of the data should be undertaken to ascertain whether there are any trends in accidents and issues that may be exacerbated by the development traffic. Statistical tests should be used if necessary to determine causality. Accident data can be obtained from trafficmonitoring@cambridgeshire.gov.uk

4. Development Proposals and Site design

Section 4.4 – It is assumed that all new junctions will be subject to capacity analysis through junction modelling and also the Stage 1 Safety Audit process with modelling results and RSA1 and designer's response/exception report being included within the TA. It would also be expected that a design audit would be submitted showing that the junction designs do in fact meet the requirements of DMRB and good practice.

Para 4.4.14 – The proposed measures listed are welcomed. However this list should not be seen as exhaustive and further infrastructure improvements to may be required. This section appears to imply that a new/diverted service will be provide but does not commit to such. As stated previously it is anticipated that new passenger transport services will be a requirement associated with this development.

5. Travel Demand

The proposed trip generation by each mode for each land use must be included in tabular form in the scoping note before further comments can be made on the acceptability of the rates.

6. Trip distribution and Assignment

Distribution diagrams must be included for all land uses in order to verify and comment on the trip distributions contained within this section.



7. Traffic Impact Assessment

Para 7.1.1 – Assessment scenarios should generally be as follows;

Base year (2018);
Future year (full occupation);
Future year (full occupation) + development;
Future year (full occupation + 5 years), and;
Future year (full occupation + 5 years) + development.

However there may be scope to revise this depending on the duration of build (speak to GW she may be able to give info on typical completions/month).

Para 7.1.3 – The need or otherwise to model the effects of the current A14 upgrade works should be discussed with Highways England in detail. The availability or otherwise of the CSRM2 would not preclude modelling of the redistribution of traffic due to the A14 works.

Para 7.1.4 – Tempro forecasts will need to be revised to take into consideration the requirements above in terms of forecast years.

Para 7.1.5 – There is a further proposed development that will need to be taken into consideration in addition to the above, this being the proposed new foodstore at land at the junction Of Stocks Bridge Way And Needingworth Road, Needingworth.

Any discounting of TEMPRO growth must be via a proven methodology and must take into consideration the fact that localised TEMPRO growth rates would not necessarily take into consideration traffic that would be on the network from developments in areas some distance away. It may therefore be the case that the trips from Alconbury Weald are not included in the Temprom rates for the area of the development and thus discounting these trips would not therefore be appropriate.

Para 7.2.3 to 7.2.10 – As stated in previous comments (Para 1.2.6) – A monitor and manage approach is not acceptable to CCC. All appropriate mitigation measures must be identified at outline stage.

Para 7.3.1 – It is likely that all the junctions identified in section 3.7 (see comments above) will need to be tested as there will be a significant impact on all of them. The two additional junctions identified in the comments will also require testing these being;

- A141/St Peters Road roundabout junction, and;
- A141/B1044/Ermine Street roundabout junction.

Para 7.3.2 to Para 7.3.4 – The nature of this development is such that the construction management plan should be able to provide a significant amount of detail in terms of routing and vehicle numbers given the limited amount of routes/accesses that construction traffic can use.



8. **Other Mode Impact**

The assessment of requirement mitigation for walk/cycle and passenger transport modes is welcomed. Comments made above in respect of Section 3 should be taken into consideration when identifying appropriate measures.

9. **Mitigation and Improvement Strategy**

Recognition of the need for a mitigation strategy is welcomed provided it extends to the whole scheme at outline stage (see previous comments). Evidence would be required to be submitted showing that any measures could be implemented in practice and would bring the impact of the development traffic to an acceptable level. CCC could not therefore specifically agree to the proposed measures at this stage.

Conclusion

The scoping note/Draft assessment should be revised to take the above comments into consideration prior to the submission of a formal planning application for the proposed development.

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**Mr Mark Hyde
Carter Jonas
One Station Square
Cambridge
CB1 2GA**

Our Ref: 18/70112/SCOP

15 June 2018

Dear Mr Hyde

Scoping opinion request under regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017:

Proposal: Scoping Opinion for 127.4Ha development site of approximately 1750 dwellings, 2.7Ha employment area, a Supermarket, Hotel, Care Home, Primary School, Neighbourhood Centre, Health Care Centre, St Ives Football club, Sports Pitches, Play Spaces, Community Centre, Allotments, Woodland and Parks

Site: Land at Giffords Farm, St Ives, Cambridgeshire

The Council has opined (ref: 17/70261/SCRE) that the project is EIA development.

Based on the information submitted in your 'ES Scoping Report' dated May 2018, this letter is the Council's Scoping Opinion.

The Scoping Opinion seeks to provide clarity as to what the Local Planning Authority considers the main effects of the development are likely to be and accordingly the main topics on which the Environmental Statement should focus. It does not prevent the Local Planning Authority from making further requests for information at a later stage if deemed necessary under Regulation 25 of the EIA Regulations.

In providing this Scoping Opinion, consultation has been undertaken with statutory and non statutory authorities deemed relevant to the content in the submitted ES Scoping Report, and the responses received have informed this Scoping Opinion.

Responses were received from the following consultees:

- Cambridgeshire County Council.
- Highways England
- Environment Agency
- HDC Landscape
- HDC Conservation
- HDC Environmental Health
- Natural England

- Historic England
- Cadent Gas
- St Ives Town Council
- Needingworth Parish Council
- Cadent Gas
- Cambridgeshire Designing Out Crime Officer

Responses were not received from the following consultees:

- Anglian Water
- National Grid

If any subsequent responses are received they will be forwarded to you for information.

Scoping Opinion:

The Council's Scoping Opinion follows the order of topics in your scoping report:

Soils & Agricultural Land

The Environment Assessment should take into account Natural England Standard Advice and all advice provided in Annex A to Natural England's letter. Your attention is drawn to the advice given by Natural England (paragraph 4 of Annex A) on land use and soils.

Archaeology & Cultural Heritage

The submitted ES Scoping Report follows the approach to archaeological investigation outlined by the County Archaeologist in its response and is therefore satisfactory. Whilst there are no designated heritage assets within the site the potential for harm to the setting of heritage assets beyond the site should be considered. This is not covered in the ES scoping report and it should be assessed in the Environmental Assessment.

Ecology

In general, based on the responses received from Natural England and the Wildlife Trust (copies attached), the approach to Ecology as set out in your Scoping Report is considered satisfactory. Natural England has advised that your scoping request is for a proposal that does not appear to affect any nationally designated geological or ecological sites (Ramsar, SPA, SAC, SSSI, NNR) or landscapes (National Parks, AONBs, Heritage Coasts, National Trails), nor is the development for a mineral or waste site of over 5ha. The Environmental Assessment should take into account Natural England Standard Advice and all advice provided in Annex A to Natural England's letter.

In line with national and local planning policy the Wildlife Trust recommends that you demonstrate (ideally using a recognised biodiversity accounting tool, such as the DEFRA biodiversity metric) how the proposals will deliver a net gain in biodiversity and you will need to consider how it can provide sufficient accessible natural greenspace as most existing sites in Cambridgeshire are at or near visitor capacity, so it is important that major new developments consider where new residents will go for access to greenspace.

Flood Risk & Drainage

In general, based on the responses received from the Environment Agency and the Lead Local Flood Authority, the approach to Flood Risk and Drainage as set out in your Scoping Report is considered satisfactory. Anglian Water did not respond to its consultation within the consultation period.

Landscape & Visual

In general, based on the response received from the Council's Landscape Officer, your approach is considered satisfactory, subject to your methodology incorporating the following:

- i) The LVIA should try and give adequate focus to an assessment of the site and its local context, say an overall area extending 2-3km beyond the site boundaries. Too often an LVIA focusses on the site itself [red line boundary] and then moves on to consider the relevant district Landscape Character Area [in this case the Central Claylands LCA as defined in the Huntingdonshire Landscape and Townscape Assessment SPD]. Essentially that assessment would jump from the site level to the District LCA level, and give insufficient attention to the local context area where significant effects are often most likely and where most of the chosen viewpoints are generally located.
- ii) The LVIA should follow the guidance at GLVIA3 paras 3.30 – 3.36. When presenting assessments of level of significance the LVIA should not place over-reliance on using tables and matrices at the expense of clear narrative description.
- iii) The LVIA should include details of any mitigation required to reduce or avoid significant effects. See GLVIA3 para 3.37 – 3.39.

Transport & Access

A full Transport Assessment (TA) should be carried out in accordance with the relevant guidance and in liaison with the Transport Assessment Team at Cambridgeshire County Council. Highways England advises that the TA makes reference to the A14 and evidence is provided to show there will be little or no impact on the A14.

Air Quality

In general your approach is reasonable but the assessment must take into account current advice from public health experts that the health impacts of air quality should be minimised, even if there is no risk that air quality standards will be breached. Therefore even if the effect is judged to be insignificant, consideration should be given to the application of good design and good practice measures, including electric vehicle rapid charge points. With regard to odour you should consider any sources emanating from the industrial estate to the west of the site as well as the Poultry Farm to the north west as advised by the Environment Agency.

Ground Conditions

A Phase 2 intrusive land contamination investigation and risk assessment as suggested in the scoping report. This should not only be targeted, but also include random sampling in what is currently arable farmland.

Noise:

The noise assessment proposals are acceptable. We would not expect noise in outdoor amenity areas to exceed 50dB L_{Aeq} during the daytime, and similarly, night-time and indoor levels should comply with BS8223:2014 and WHO standards.

Socio-Economics

The approach to considering Socio-economics as set out in your Scoping Report is generally considered to be appropriate.

Cumulative assessment:

For the purposes of cumulative assessment you rely on a qualitative “close proximity” criterion. Your assessment should describe the search area in quantitative terms and be justified in the assessment. Since your Scoping Report was prepared the Council has resolved to grant planning permission for up to 120 dwellings at Needingworth (ref. 17/01687/OUT) and the Council is considering an application for an Aldi Food Store on land opposite Morrisons Food Store (ref. 17/01706/FUL).

Other matters:

Please also consider the advice from the Environment Agency that the scope of the ES should be widened to cover Water Resources, Water Quality, Waste, Environment Management & Pollution Prevention, Fisheries Recreation and Geomorphology.

Matters raised by the Needingworth Parish Council and St Ives Town Council cut across a number of topics and in some cases relate to the accuracy of data provided in the ES Scoping Report. You should consider the matters raised in undertaking the assessment.

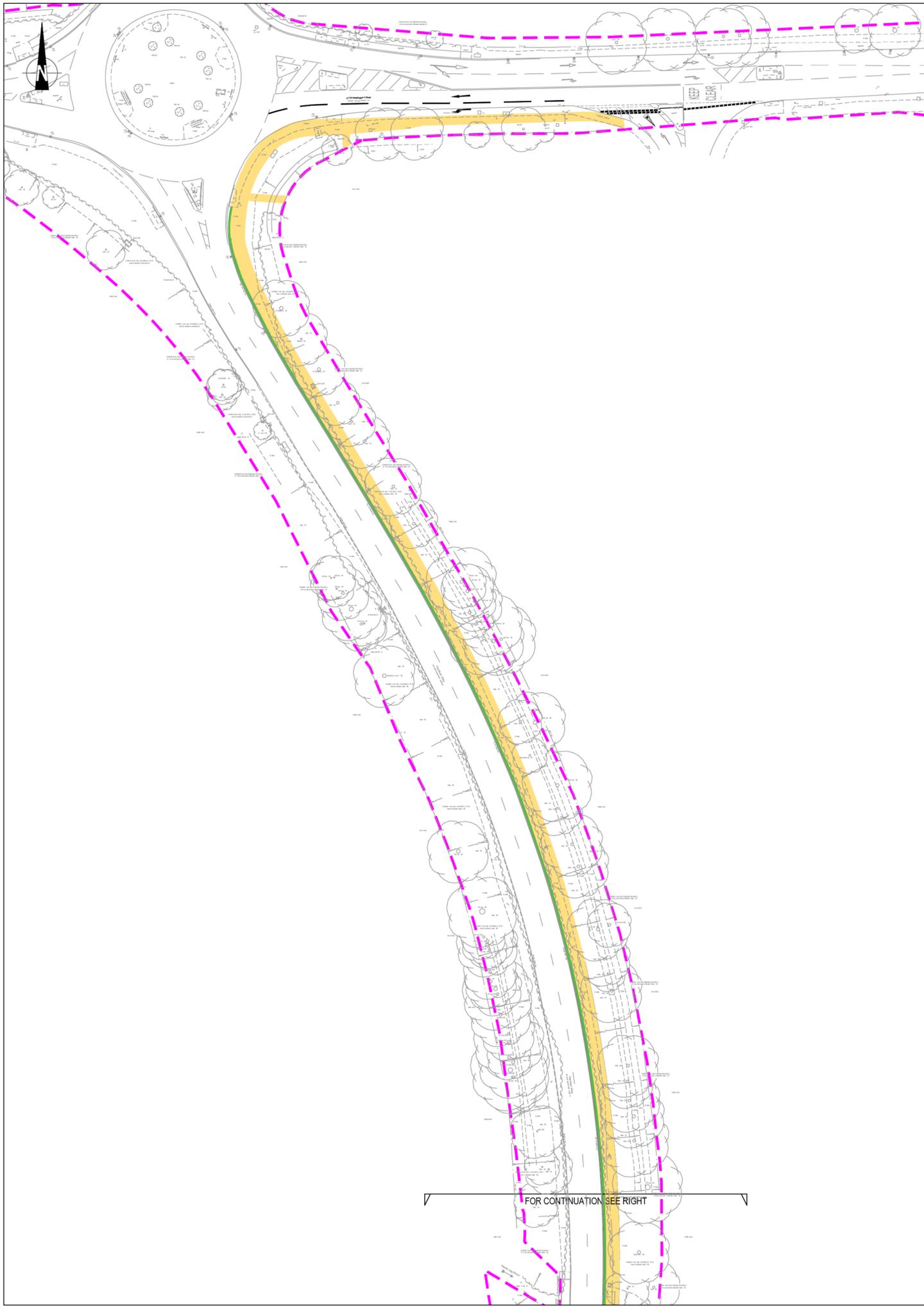
Summary:

The proposed scope of the Environmental Assessment is generally acceptable, subject to the assessment taking full account of the consultee responses accompanying this letter and summarised above.

If you wish to discuss this matter further, please contact Gavin Sylvester on 01480 387070.



Andy Moffat
Head Of Development



NOTES

1. ALL DIMENSIONS ARE IN MILLIMETRES UNLESS NOTED OTHERWISE.
2. ALL LEVELS ARE IN METRES RELATIVE TO ORDNANCE DATUM NEWLYN UNLESS NOTED OTHERWISE.
3. ALL COORDINATES ARE IN METRES RELATIVE TO ORDNANCE SURVEY NATIONAL GRID.
4. THE CONTRACTOR IS TO VERIFY ALL DIMENSIONS ON SITE BEFORE COMMENCING WORK OR PREPARING SHOP DRAWINGS.
5. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL ENGINEERS AND ARCHITECTS DRAWINGS AND SPECIFICATIONS.

LEGEND

- HIGHWAY BOUNDARY
- PROPOSED SHARED PATH (FOOTWAY/CYCLEWAY) (3.0M)
- VERGE/BUFFER (500MM)

Mark	Revision	Date	Drawn	Chkd	Appd

SCALING NOTE: Do not scale from this drawing. If in doubt, ask.
 UTILITIES NOTE: The position of any existing public or private sewers, utility services, plant or apparatus shown on this drawing is believed to be correct, but no warranty to this is expressed or implied. Other such plant or apparatus may also be present but not shown. The Contractor is therefore advised to undertake his own investigation where the presence of any existing sewers, services, plant or apparatus may affect his operations.

Drawing Issue Status **FOR INFORMATION**

**GIFFORDS PARK
 ST IVES
 PROPOSED SHARED FOOTWAY/
 CYCLEWAY**

Client HALLAM LAND MANAGEMENT			 Offices throughout the UK and Europe www.peterbrett.com © Peter Brett Associates LLP CAMBRIDGE Tel: 01223 882000
Date of 1st Issue 20.09.2018	Designed FB	Drawn FB	
A1 Scale 1:500	Checked NTP	Approved EP	
Drawing Number 31874/5501/001	Revision -		