Huntingdonshire
DISTRICT COUNCIL

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**David Akam**
**David Lock Associates**
**50 North Thirteenth Street**
**Milton Keynes**
**MK9 3BP**

By email only

Our Ref: 25/70019/SCOP
Your Ref: --

14 April 2025

Dear Mr Akam

**25/70019/SCOP: Brookfield Farm, Ermine Street, Great Stukeley, Huntingdon PE28 4AB ("Hinchingbrooke Logistics Park")**
**Re: Request for EIA Scoping Opinion under Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations (as amended)**

Proposal:

- Up to 205,000sqm (2,200,000sqft) GIA of employment floorspace comprising a maximum of 30% Use Class B2 industrial uses and the remainder falling within Use Class B8 storage & distribution or other Sui Generis uses (such as a bus/coach depot or equivalent transport-related uses) with similar environmental characteristics to B2/B8 uses
- Access improvements including a new roundabout on the A141, realignment of the existing dual-carriageway and grade-separated pedestrian/cyclist crossing facilities
- Associated car, cycle and goods vehicle parking;
- Earthworks, landforming and regrading to provide development plateaux
- Green infrastructure incorporating sustainable drainage infrastructure, structural planting, retained vegetation and recreational and amenity space targeting 15% Biodiversity Net Gain.

The proposed development is intended to be implemented on a phased basis with each phase being a separate and severable part of the development. As this is a case where a consent procedure involves more than one stage (a multi-stage consent) – in this case comprising an outline planning permission and subsequent stage(s) dealing with reserved matters - the effects of the project on the environment should normally be identified and assessed when determining the outline planning permission.

This letter constitutes the Scoping Opinion of the Local Planning Authority (LPA) and seeks to clarify what the LPA considers the main effects of the development are likely to be and accordingly, the main topics upon which the Environmental Statement (ES) should focus.

In providing this Scoping Opinion, relevant statutory and non-statutory authorities were consulted. The responses have informed this Scoping Opinion and copies are enclosed as appendices for reference.

Responses were received from the following consultees:

- Alconbury Flood Group
- Anglian Water
- Brampton Parish Council
- Cambridgeshire County Council (Archaeology Officer)
- Cambridgeshire County Council (as Lead Local Flood Authority)
- Cambridgeshire County Council (as Local Highway Authority)
- Cambridgeshire County Council (as Minerals & Waste Authority)
- Cambridgeshire County Council (Rights of Way Officer)
- Environment Agency
- Historic England
- Huntingdonshire District Council (Conservation Officer)
- Huntingdonshire District Council (Ecology Officer)
- Huntingdonshire District Council (Economic Development Officer)
- Huntingdonshire District Council (Environmental Health Officer)
- Huntingdonshire District Council (Landscape Consultant)
- Huntingdonshire District Council (Tree Officer)
- Huntingdonshire District Council (Urban Design Officer)
- Huntingdon Town Council
- National Highways
- Natural England
- The Stukeleys Parish Council

At the time of writing, no response has been received from the following:

- British Horse Society
- Campaign to Protect Rural England
- Wildlife Trust

If received, responses from those listed above will be forwarded to you.

This Scoping Opinion is structured to follow the chapters within the submitted Environmental Impact Assessment Scoping Report (David Lock Associates – March 2025). Pertinent issues raised by consultees are included in the relevant section.

Your Scoping Report proposes that the following topics are scoped into the Environmental Statement:

- Socio-Economics
- Transport
- Flood Risk and Water Resources

- Air Quality
- Noise and Vibration
- Climate Change
- Landscape, Arboriculture and Visual Effects
- Ecology
- Heritage
- Agriculture and Soil Resources

**1. Introduction**

Noting that policy context matters are intended to be incorporated with the assessment chapters rather than as a chapter in itself, for the avoidance of doubt the statutory Development Plan pertaining to this site comprises:

- Huntingdonshire's Local Plan to 2036 (Adopted May 2019)
- The Stukeleys Neighbourhood Plan (Made July 2023)
- Cambridgeshire and Peterborough Minerals and Waste Local Plan (Adopted July 2021)

Your assessment of policy context should also reflect:

- The National Planning Policy Framework (currently the iteration published December 2024 and the subsequent correction in January 2025)
- Any relevant measures in the forthcoming Levelling Up and Regeneration Act and associated revisions to the National Planning Policy Framework (NPPF)
- The Council's progress in preparing and adopting a replacement of the current Adopted Local Plan which, at the time of writing, envisages Preferred Options (Regulation 18) consultation in Autumn 2025 and Pre-submission Consultation (Regulations 19 and 20) in Spring 2027.
- The range of relevant Supplementary Planning Documents adopted by the Local Planning Authority

**2. Site Description and Proposed Development**

Proposed maximum buildings heights should be cited as both height AOD and height above ground level.

<u>Cumulative assessments</u>

An impact assessment should (subject to available information) identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out, including:

- Existing completed projects (in respect of baseline assessments)
- Projects with planning permission which have not yet commenced
- Projects with a committee resolution to grant planning permission
- Approved but uncompleted projects
- Ongoing activities that are not already included in the baseline assessments
- Other committed plans or projects for which an application has been made and which are under consideration by the consenting authorities

- Plans and projects which are reasonably foreseeable and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects

Further discussion in respect of the precise methodology for undertaking cumulative assessments is recommended.

Within Huntingdonshire the following allocated development sites in the Adopted Local Plan should be considered, given their proximity to the proposal site:

- Local Plan site SEL 1.1: Alconbury Weald
- Local Plan site SEL 1.2: RAF Alconbury
- Local Plan site HU 1: Ermine Street
- Local Plan site HU 3: Former Police HQ site
- Local Plan site HU 4: West of Railway, Brampton Road
- Local Plan site HU 5: Land at Edison Bell Way
- Local Plan site HU 9: Huntingdon Racecourse

Committed sites must also include the redevelopment of Hinchingbrooke Hospital in order to reflect the Department for Health and Social Care announcement on 20th January 2025 ("New Hospital Programme – Plan for Implementation"). There is sufficient information on this project available in the public realm for an appropriate technical and quantitative cumulative assessment of this scheme to be undertaken. In any event, the National Health Service will be submitting a detailed EIA Scoping request for the hospital's redevelopment (expected in May 2025), which will provide further information. Huntingdon Town Council's concerns in respect of the omission of the Hinchingbrooke Hospital redevelopment from the cumulative assessments are noted and supported in this respect.

Your Scoping Report's commentary regarding the potential commercial development at Brampton Cross is noted and, at the time of writing, it is agreed that this scheme does not constitute committed development for the purposes of the EIA Regulations. Should a planning application for Brampton Cross be submitted during the course of your future planning application then the Local Planning Authority will need to review its position and may require additional cumulative environmental assessment works to be undertaken.

**3. Socio-Economics**

The inclusion of this chapter within an ES is supported.

In addition to the policy context set out at (1) above, the relevant policy context for this chapter should also include:

- Government's Industrial Strategy
- Economic & Employment Needs Assessment report due to be published in May 2025, commissioned by the Council as part of the evidence base for the Local Plan review
- Economy Growth Strategy Refresh report due to be published in May 2025, commissioned by the Council

4. **Transport**

The inclusion of this chapter within an ES is supported.

National Highways advises that it will be necessary to take account of the interaction of the site with the Strategic Road Network (principally the A1) as well as identifying any measures that may need mitigation. The assessment should be undertaken in accordance with DfT Circular 01/2022 "The Strategic Road Network and the Delivery of Sustainable Development". Supporting the scope of works set out in your Scoping Report, National Highways has provided a list of information it expects to see within your Environmental Statement; this is set out in their attached consultation response.

National Highways agree with the inclusion of Strategic Road Network junctions within the study area. Information on trip distribution, including flow diagrams relating to the junction on the Strategic Road Network, should be included. In the event of the development generating 30 or more two-way movements at any junction within the morning or afternoon peak periods, capacity assessments will need to be undertaken and mitigation proposals provided, if required.

A planning application for the proposed development would need to be supported by a Transport Assessment (TA) scoped with the Local Highway Authority and undertaken in accordance with Cambridgeshire County Council's TA requirements dated January 2024 Transport Assessment Requirements - January 2024 and Highway Development Management General Principles for Development. In the context of the preapplication engagement you have already had with them to date, the Local Highway Authority has declined to provide any detailed scoping comments; further engagement is recommended.

The ES should provide clarity to Brampton Parish Council's concerns as to a lack of clarity on the extent of proposed vehicular access via the racecourse.

Access to nature within the proposed development site should be considered, including the role natural links have in connecting habitats and providing movement pathways for species. The County Council's Rights of Way Officer specifically highlights public footpath 8 crossing the site, as well as footpath 23 and bridleways 6 and 26 in close proximity. Their definitive routes and relationship with the proposed masterplan should be assessed within the ES, noting at the current time footpath 8 is severed by the A141 dual carriageway and appears to have a walked route that differs from that shown on the definitive footpath map.

A Construction Traffic Management Plan should be submitted as a supporting document with any planning application, but need not fall within the ES itself.

5. **Flood Risk and Water Resources**

The inclusion of this chapter within an ES is supported.

The Flood Risk Assessment (FRA) will be key to several topics covered by an ES, including the Water Resources and Climate Change chapters. It will also require integration within the

chapters covering Ecology and Landscape & Visual. The Environment Agency's comments reflect those of the Alconbury Flood Group.

The detailed advice provided by the Environment Agency and the Lead Local Flood Authority (LLFA) in respect of the scope and content of the FRA is adopted by the Local Planning Authority for the purposes of this Scoping Opinion and is appended accordingly. Similarly, the appended Sustainable Urban Drainage Systems (SUDS) advice provided by these bodies in respect of a surface water drainage strategy is adopted by the Local Planning Authority for the purposes of this Scoping Opinion, including the need for both a full Flood Risk Assessment and a surface water drainage strategy.

The sequential approach to site layout set out at paragraph 175 of the National Planning Policy Framework should be taken, in accordance with the Environment Agency's advice and noting the concerns of the Alconbury Flood Group regarding existing flood risk within the site itself, and additional run-off into the Alconbury Brook. Brampton Parish Council's concerns in respect of drainage into the Alconbury Brook, and wider flooding concerns in the area to the south of the proposed development, should specifically be considered within the ES.

The Environment Agency has advised that the proposed development is located in an area of serious water stress and has the potential to increase demand for water and result in increased abstraction from groundwater sources. All growth from new development must be supplied with water from sustainable sources and an assessment must be included as to whether the development would need to be phased to reflect the requirement for or timings of any planned new strategic schemes, with reference to Anglian Water's *Water Resources Management Plan* and based on the information set out in a Utilities Statement supporting document.

Water used during the construction phase needs to be considered separately to that to be used during the operational phase. Most water-related construction activities are likely to be licensable; new consumptive abstraction licences are not available, and any new dewatering will need to be demonstrably non-consumptive in order to obtain an extraction licence. Dewatering by other means would need to be agreed in advance with the LLFA.

The availability of non-domestic water supply should be specifically confirmed by Anglian Water, and their demand management objectives assessed and incorporated within the Utilities Statement supporting document. The consultation response of Anglian Water is appended and should be carefully considered.

During both the construction and operational phases an assessment must be made as to whether the proposed development would detrimentally affect any water bodies (streams, ponds, lakes, ditches, drains etc), including both licensed and unlicenced abstractions, including the 12no. abstraction points/reaches/areas within a 5km radius. The by-laws and restrictions of the Alconbury and Ellington Internal Drainage Board (IDB) (part of the Bedford Group of IDBs) should be noted, given that the IDB and Environment Agency both in-part manage abstractions in this area. You should consult with the IDB and the ES will need to include evidence in relation to any anticipated impacts on the IDB's systems.

The Environment Agency note that, whilst the site itself is not within a Source Protection Zone (SPZ), watercourses that run adjacent to the site flow downstream into SPZs, as set out in their consultation response.

In terms of wastewater, it is noted that foul water load is to be scoped into the ES and will be important that a specific section on Water Quality is included, extending to a Water Quality Assessment that considers the catchment constraints within which the proposed development lies. The default should be to connect to the mains network where possible and thus the ES should analyse the impact of the proposed development on existing water treatment works, including by way of a cumulative assessment. Anglian Water's advice in respect of a lack of capacity at the Huntingdon (Godmanchester) Water Recycling Centre will need to inform your foul water strategy, which should be set out and reflected in the ES. An assessment of the impact of any proposed onsite water treatment facilities on water quality should be included and a specific Foul Water Strategy Assessment should form part of the ES. Any known or forecast capacity constraints, including those outlined in the attached letters from the Environment Agency and Anglian Water, should be taken into account. The Environment Agency considers the Council's 2014 *Water Cycle Study* to be out-of-date and that in the absence of an updated assessment by the Council, an assessment will need to be made to assess the impacts of the proposed development both individually and cumulatively. The advice of Anglian Water is appended and should be reflected in the ES.

The relevant objectives of the Water Framework Directive (i.e. no deterioration in water body status and achieving Good Ecological Status" should be reflected in the design of the proposed drainage scheme, using baseline information from the *Anglian River Basin Management Plan* and baseline status information from relevant Water Framework Directives surface water bodies within the proposed development area.

In the event that any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans are being developed or implemented to mitigate and address the impacts of elevated nutrient levels, the ES should take these into account as per Natural England's consultation response.

**6. Air Quality**

The inclusion of this chapter with an ES is supported.

The site is not located within an Air Quality Management Area but nonetheless the health impacts of air quality should be minimised, even if there is no risk that air quality standards will be breached. This is supported by both national and local planning policies promoting air quality improvements and minimisation of impacts. Therefore even if the effect is judged to be insignificant, consideration should be given to the application of good design and good practice measures for both the construction and operational phases. 2023 air quality data for the Huntingdonshire District is available in the Annual Status Report on our website. Huntingdon Town Council's request for an air quality baseline assessment should be reflected within the ES, as should Natural England's air quality comments.

HDC's Environmental Health Officer welcomes the confirmation within Section 6.9 that a Construction Dust Assessment will be completed to determine appropriate mitigation for a

Construction Environmental Management Plan (CEMP). Section 6.14 discusses the model to be used to predict pollutant concentrations at off-site human receptors to assess the impacts of additional road traffic and changes to road alignments and that existing residential properties will be assessed – this should also include proposed properties on adjacent land, especially those to the north east of the site. Appropriate regard to Defra's PM2.5 Targets: Interim Planning Guidance should be had within the assessment.

**7. Noise and Vibration**

The inclusion of this chapter with an ES is supported.

Noise impacts should be considered in relation to WHO guidelines and BS8233.

Figure 7.1 demonstrates the introduction of monitoring point LT4 which is welcomed. It is expected that this will be located to ensure there is no impact from activities occurring at the Brookfield Farm Complex (which Section 2.5 identifies as including agricultural, industrial & commercial uses), and if there are impacts these are considered appropriately.

Section 7.15 regarding the construction phase noise and vibration impacts methodology should reference the more up to date BS 5228-1:2009+A1:2014 & BS 5228-2:2009+A1:2014.

**8. Climate Change**

The inclusion of this chapter within an ES is supported.

Natural England has advised that the ES should identify how the development affects the ability of the natural environment (including habitats, species and natural processes) to adapt to climate change. This should include an assessment of the impacts on the vulnerability or resilience of a natural feature as well as impacts on how the environment can accommodate change for both nature and people. Nature-based solutions should be considered to address impacts.

The ES should also identify how the proposed development impacts the natural environment's ability to store and sequester greenhouse gases.

With reference to the judgement in the case of *R (on the application of Finch of behalf of the Weald Action Group)(Appellant) v Surrey County Council and others (Respondents)* there is not the same certainty of greenhouse gas emissions as featured in *Finch* from an employment development which the Court found would be inherent to an oil extraction scheme. Accordingly, an assessment of downstream greenhouse gas emissions will not be required within the Environmental Statement, provided that this is addressed in the relevant related assessment documents submitted with the application.

**9. Landscape, Arboriculture and Visual Effects**

The inclusion of this chapter with an ES is supported.

Natural England's appended advice on the use of Landscape Character Assessment, National Character Areas, the *National Design Guide* and the Landscape Institute's *Guidelines for*

*Landscape and Visual Impact Assessment* (2013) guidance is noted and supported. Landscape Character Areas should be mapped at a scale appropriate to the site as an assessment of landscape character will be integral to the Landscape and Visual Impact Assessment (LVIA), informing the baseline. The submitted methodology's approach to assessing landscape and townscape character considerations is acceptable, as is the proposed method of making judgements on the susceptibility of landscape character at the site to receiving the characteristics of the proposed development.

The LVIA methodology set out in the Scoping Report is supported, as is the baseline study area, Zone of Theoretical Visibility, receptors and viewpoints. The illustrative and representative views are agreed, as are the type(s) of visualisation required from each viewpoint. The use of visualisations and the detailed technical advice set out in the appended consultation response from Place Services (the Council's landscape consultant in this matter) should be incorporated, and the expectation that an Environmental Colour Assessment is provided within the LVIA should also be adopted.

A cumulative landscape and visual assessment should be undertaken. It should be demonstrated how the LVIA has informed the proposed landscape masterplan within the planning application. Place Service's appended comments are adopted by the Local Planning Authority for the purposes of this Scoping Opinion, and the need for supporting information including a Landscape Strategy, phasing plan, lighting, signage, temporary/permanent fencing, and a management/maintenance plan for the landscape elements.

Historic England has advised that heritage-specific viewpoints and visualisations should be included within the LVIA. Figure 11.1 of your Scoping Report is noted in this respect but does not propose the heritage-specific viewpoints previously advised by the Council's Conservation Officer. It should be amended accordingly to add the additional viewpoints set out in the Conservation Officer's advice.

The Council's Tree Officer has advised that there is a potentially large impact to the amenity/arboricultural landscape of the area, which could be reduced and minimised with appropriate site planning. Retention of the existing tree belt on the north-western side of the A141 should be prioritised as much as possible. Relevant chapters within the ES should explore and assess the relationship of existing and proposed trees (such as with regard to landscape and ecology), informed by a Tree Survey and Arboricultural Impact Assessment which could be submitted as separate documents that inform but sit outside the ES itself. Whilst it will be acceptable for these documents to form part of the related assessments submitted with the application, their findings should inform the baseline within the ES.

A separate Hedgerow Assessment (in accordance with the Hedgerow Regulations 1997) should similarly inform the ES but could be submitted as a standalone document or within the Arboricultural Impact Assessment. As per Natural England's advice, within the ES an assessment of the proposed development on any ancient woodland, ancient or veteran trees should be made, including the scope to avoid or mitigate for any adverse impacts and identify opportunities for enhancement. A Tree Protection Plan and Arboricultural Method Statement should be submitted as supporting documents.

**10. Ecology**

The inclusion of this chapter within an ES is supported.

Natural England has advised that the proposed development may impact on the Portholme Special Area of Conservation (an internationally-designated conservation site) and the associated Portholme Site of Special Scientific Interest (a nationally designed site). The ES should thoroughly assess the direct and indirect effects of the proposed development of the features of special interest in the SSSI and an appropriate assessment pursuant to Regulation 63 of the Habitat Regulations may need to be made. Natural England's detailed advice in respect of both the SAC and the SSSI is attached and is adopted by the Local Planning Authority for the purposes of this screening opinion.

The Environment Agency has similarly advised that the ES should consider whether the proposed development would have any effect on any Water Framework Directive waterbodies or any deterioration in any RAMSAR site or SSSI covered by the Habitats Directives.

The ES should consider any impacts on local wildlife and geological sites, including Local Nature Reserves, setting out proposals for the mitigation of any impacts and if appropriate compensation measures as well as opportunities for enhancement and improved connectivity with wider ecological networks.

All stages of the proposed development should be assessed within the ES with regard to protected species, including but not limited to great crested newts, reptiles, birds, water voles, badgers and bats. Records of protected species should be obtained from the appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the proposed development should be thoroughly surveyed by competent ecologists at appropriate times of the year for relevant species and the survey results, impact assessments and accompanying appropriate mitigation strategies included as part of the ES. An appropriate level habitat survey should be carried out onsite to identify any important habitats present, in addition to ornithological, botanical and invertebrate surveys in order to establish whether any scarce or priority species are present. Based on the information presented the surveys already undertaken are sufficient in their scope, subject to compliance with the CIEEM's *Advice note on the Lifespan of Ecological Reports and Surveys* (attached) regarding their expiry.

The baseline biodiversity value of the site needs to be correctly assessed in accordance with Paragraph 6 of Schedule 7A of the Town and Country Planning Act 1990, an anti-avoidance provision designed to prevent a site's pre-development biodiversity value being artificially lowered through activities such as vegetation clearance. The baseline biodiversity assessment therefore needs to account for any/all habitat removed since 30th January 2020. Paragraph 6B within the same Schedule describes how to assess the biodiversity value of the removed

habitat if there is insufficient evidence of its value immediately before the degradation occurred.

The ES should contain details of:

- Any historic data for the site (including from previous surveys)
- Additional surveys carried out as part of the proposed development
- The habitats and species present
- The status of these habitats and species
- The direct and indirect effects of the proposed development on these habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

All surveys should follow CIEEM's Advice note on the Lifespan of Ecological Reports and Surveys regarding their expiry.

Natural England, the Environment Agency and the Council's Ecology Officer have all advised that a detailed assessment of Biodiversity Net Gain will be required, as well as information and details on the conducted ecological surveys mentioned in the Scoping Report.

**11. Heritage**

The inclusion of this chapter with an ES is supported.

Within a 1.5km radius of the site there are 54 listed buildings (including 4no Grade I and 2no Grade II*), 2 Conservation Areas and 5 Scheduled Monuments.

Historic England has commented that the proposed development could potentially have an impact on designated heritage assets in the area around the site and their settings, and that therefore a thorough assessment of the likely effects that the proposed development might have on those elements contributing to the significance of affected assets should be contained within the ES. Assessment of potential impacts should be undertaken in accordance with established policy and guidance, notably that set out in the NPPF and on Historic England's *Planning Note 3: The Setting of Heritage Assets*. The concepts of benefit, harm and loss (as described in the NPPF) should be employed.

Historic England has further advised that the proposed development could affect the significance of heritage assets at some distance from the site itself. The ES must contain an assessment which clearly demonstrates that the extent of the study area has been appropriately sized to ensure that all heritage assets likely to be affected by the proposed development have been included and can be properly assessed. Effects on setting should be assessed in terms of noise, light, and traffic, in addition to visual impacts.

The Council's Conservation Officer has advised that whilst there are no listed buildings or Conservation Areas within the site, the scale and massing of the proposed development may affect the setting of a number of heritage assets including the Grade I listed building at Pepys

House, the Grade II* listed church at Great Stukeley, and the Grade II listed building at Alconbury House. These should all be specifically assessed within the ES and appropriately included as heritage-specific viewpoints within the LVIA, even if only to demonstrate a lack of intervisibility. The Conservation Area at Brampton and the listed buildings within it (including Pepys House) may experience change within its setting, which the ES should assess.

The County Archaeologist supports the historic environment (including archaeology) being scoped in to the applicant's proposed Environmental Impact Assessment, advising that given the proposed development's size and nature, any in situ archaeological assets within the site would be heavily impacted or destroyed.

Archaeological potential is high. The proposed development is directly to the west of significant Iron Age and Roman remains found at Bob's Wood, Hinchingbrooke in advance of residential development circa 2003 (Cambridgeshire Historic Environment Record no. MCB14554). A series of complex, multiphase likely domestic enclosures were revealed on the higher ground overlooking Ermine Street that continues into the proposed development site. Human remains were present (both inhumations and cremations), along with nine roundhouses, pit alignments and (later) rectangular buildings associated with opus signinum and mortar. Cropmarks of ditched archaeological remains are present within the proposed development site itself, albeit mainly at the northern end on the lower ground. These include several cropmarked enclosures (MCB23824) and two ring ditches (MCB23365). To the south of the proposed development site is a scheduled monument (1006858) covering an area of national significant prehistoric archaeology, notably a Neolithic cursus and mortuary enclosure (MCB2693), and a complex rectilinear enclosure complex with associated ring ditches (MCB2692).

The proposed programme of archaeological survey, including geophysics and trial trenching, previously agreed with the County Archaeologist should inform the relevant ES chapter. The discussions you have already had with the County Archaeologist regarding the scope and nature of this should reflect the briefs for geophysical survey and trial trenching that have been agreed.

In respect of non-designated archaeological assets within the site and within a 1km radius, Historic England has further advised that the impact of the proposed development on these assets, their settings and the contribution their settings make to their significance should be assessed in a manner that ensures all impacts are fully understood. The likelihood of alterations to drainage patterns affecting archaeological remains should be explored.

**12. Agricultural and Soil Resources**

The inclusion of this chapter with an ES is supported.

An agricultural land survey should be carried out to determine any areas of Grade 3a land as per the Agricultural Land Classification, to support detailed mapping of any Grade 1 or Grade 2 land.

Natural England has advised that the following issues should be considered where appropriate within the ES:

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost, including the impacts on any best and most versatile (BMV) agricultural land based on a detailed Agricultural Land Classification survey
- Details of how any adverse effects on BMV agricultural land can be minimised through site design and masterplanning
- How adverse impacts on soils can be avoided or minimised including conservation through site design, areas of green infrastructure etc with the aim of minimising soil handling and maximising the sustainable use and management of the available soil.

You should note the Alconbury Flood Group's comments in respect of the impact of the proposed development on the site's existing agricultural soils, which should be reflected in your impermeable areas calculations. A soil regeneration strategy should be submitted in support of your planning application, but need not fall within the ES itself; this could, for example, fall within a site-wide Waste/Materials Management Plan which provides a framework of measures for the construction stage including the sustainable reuse of surplus materials, including soil.

**Environmental Topics Proposed to be Scoped Out**

Population and Human Health

The Local Planning Authority agrees that a standalone chapter can be scoped out, provided that a comprehensive assessment is made on sensitive receptors (such as nearby dwellings) in the relevant ES chapters, for instance in respect of air quality and noise.

Risk of Major Incidents and/or Disasters

An assessment of major accidents and disasters is proposed to be scoped out of the ES. The Local Planning Authority agrees that a standalone chapter can be scoped out of further assessment, subject to the potential risks being considered in other ES Chapters where relevant.

Utilities

The Local Planning Authority agrees that a standalone chapter can be scoped out, subject to matters such as water provision, foul water treatment and so forth being considered in other ES chapters where relevant.

Ground Conditions and Contamination

The approach to scoping out this topic area is agreed, provided that this is addressed in the relevant related assessment documents submitted with the application.

The Council's Environmental Protection Officer advises that a Contaminated Land Risk Assessment document should be provided. It will be acceptable for these documents to form part of the related assessments submitted with the application.

Minerals, materials and Waste

Part of the proposed development site falls within a Mineral Safeguarding Area. The planning application supporting documentation should acknowledge the presence of this resource and

assess compliance with the relevant policies in the Minerals and Waste Local Plan. The Minerals and Waste Authority is content that matters of minerals safeguarding can appropriately be addressed within a Planning Statement, rather than within the ES itself.

Minerals safeguarding aside, given the scale of the proposed development there is likely to be a significant need for materials during the construction phase, as well as the potential for significant waste arisings during both the construction and operational phases. Consequently, it is not agreed that this topic can be scoped out but rather, a chapter should be included within the Environmental Statement which makes an assessment of:

- The materials required to construct the development and their potential source;
- The effect of the proposed development plateaux in respect of soil movement within the site, requirements for soil importation, and requirements for offsite soil deposal;
- The volume of likely waste arisings during the construction phase, including its methods and locations of disposal; and
- A similar waste assessment in relation to the operational phase.

Lighting

A Lighting Assessment has been identified as a proposed related assessment. Whilst largely a matter which could be appropriately assessed in subsequent applications (including at reserved matters or conditions discharge stage), nonetheless reference is made to the Institute of Lighting Professionals Guidance on the reduction of obtrusive light, which Council's Environmental Protection Officer would agree with. The visual and landscape impacts of lighting may be an adverse effect and an assessment of these during night-time should be included within the relevant ES chapters. Similarly, lighting may have an adverse effect on light-sensitive species and should be assessed within the ecology chapter.

**13. Summary** – *noted*

This Scoping Opinion does not prevent the Local Planning Authority from making further requests for necessary information at a later stage under Regulation 25 of the EIA Regulations.

I trust the above is of assistance. If you wish to discuss this matter further please contact the Case Officer, James Croucher, on 07590 827 684.

Yours sincerely

C. Kerr

Clara Kerr
Chief Planning Officer