

PLANNING COMMITTEE



Thursday, 29 July 2021

Democratic and Members' Services

Fiona McMillan

Monitoring Officer

10:00

Shire Hall

Castle Hill

Cambridge

CB3 0AP

**University of Cambridge Sports Centre
Philippa Fawcett Drive, Cambridge, CB3 0AS**

AGENDA

Open to Public and Press by appointment only

1 Notification of Chair and Vice Chair

2 Apologies for Absence

3 Declarations of Interest

*Guidance for Councillors on declaring interests is available at:
<http://tinyurl.com/ccc-conduct-code>*

4 Minutes 15th April 2021

3 - 6

PLANNING APPLICATIONS

5 E/3003/18/CM - Willow Hall Farm, Haddenham, Ely, CB6 3PA

7 - 84

6 CCC/20/040/FUL - Land to the North-North West of Hauxton Road (A10), to the North West and North of Junction 11 of the M11 and to West of Cambridge Road (A10) CB22 5HT

85 - 194

ITEMS FOR INFORMATION

7 Summary of Decisions Made Under Delegated Powers

195 - 198

The Planning Committee comprises the following members:

For more information about this meeting, including access arrangements and facilities for people with disabilities, please contact

COVID-19

The legal provision for virtual meetings no longer exists and meetings of the Council therefore take place physically and are open to the public. Public access to meetings is managed in accordance with current COVID-19 regulations and therefore if you wish to attend a meeting of the Council, please contact the Committee Clerk who will be able to advise you further.

Councillor Henry Batchelor (Chair) Councillor Catherine Rae (Vice-Chair) Councillor David Connor Councillor Steve Corney Councillor Ian Gardener Councillor Ros Hathorn Councillor Sebastian Kindersley Councillor Tom Sanderson and Councillor Mandy Smith

Clerk Name:	Daniel Snowdon
Clerk Telephone:	01223 699177
Clerk Email:	daniel.snowdon@cambridgeshire.gov.uk

PLANNING COMMITTEE: MINUTES

Date: Thursday 15th April 2021

Time: 10.00am – 10.26am

Place: Virtual Meeting

Present: Councillors B Ashwood, D Connor (Chairman), I Gardener (Vice-Chairman), L Harford, B Hunt, S Kindersley, J Scutt, and M Smith.

Officers: Kate Bannigan – Planning Officer, Emma Fitch – Joint Interim Assistant Director, Environment and Commercial, Deborah Jeakins – Principal Enforcement and Monitoring Officer, Jaspreet Lyall – LGSS Law, Daniel Snowdon – Democratic Services Officer and, Jane Stanley – Interim Business Manager County Planning Minerals and Waste.

118. Apologies

None

119. Declarations of interest.

Councillor Kindersley declared a non-statutory disclosable interest in agenda item number 6, Summary of Decisions Taken Under Delegated Powers as there were several applications for which he was the local Member and as a member of Cam Academy Trust.

120. Minutes – 28th January 2021

The minutes of the Planning Committee meeting held on 28th January 2021 were agreed as a correct record, and would be signed by the Chairman at a later date.

121. Review of the Information Requirements for the Validation of Planning Applications.

The Committee received a report that considered the revisions to the Local Validation List.

The presenting officer informed the Committee that the document required review at least every two years. The requirements applied to planning applications for Cambridgeshire County Council's own developments and

waste developments. The Local Validation List sets out what information was required to accompany planning applications in addition to national requirements.

The presenting officer drew attention to the revised consultation drafts and highlighted the key points including the accessibility requirements set out within the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018. New requirements that had been included were set out at paragraph 2.2 of the report and additional guidance included at paragraph 2.3.

The presenting officer informed the Committee of a minor error within paragraph 2.3 of the report where the word “two” had been erroneously included.

Members noted that the consultation had lasted 6 weeks between 25th January and 8th March 2021. A summary of responses to the consultation were contained within Appendix A of the report and proposed revisions to the Local Validation List were contained at section 4 of the report.

During discussion of the report Members noted that the List would be in operation for just under 2 years once published. The reports sought the provision for the ability for officers to amend and update links and references to documents in the List which become outdated and/or are superseded during the period that the 2021 list is in use. For example, to account for the adoption of Local Plans and changes to the National Planning Policy Framework (NPPF).

It was proposed by Councillor Kindersley and seconded by Councillor Harford that the recommendation be put to the vote.

It was resolved unanimously to:

Endorse the proposed revised list and guidance notes.

122. Enforcement Update Report

The Committee received the Enforcement Update report that provided an overview of the work undertaken by the team for the period 1st October 2020 to 28th February 2021. The Principal Enforcement and Monitoring Officer informed the Committee of the suspension of monitoring visits due to COVID-19, however, site monitoring would resume in the near future.

Members were informed of the following updates to specific enforcement actions that had occurred since the publication of the report:

- Road improvements at Block Fen Drove were well underway and works were nearly complete. The Committee was informed that officers would continue to monitor progress.
- A new planning application had been received relating to Saxon pit

brickworks that was being determined, although it did not relate to the current investigations.

- A planning application had been received relating to Westons Yard, Pondersbridge that sought to vary conditions to reflect a smaller site area and reduced acoustic fencing. Members were informed that the application was not yet valid, and no pre-application advice had been sought from officers. The agent and the applicant had been informed that as the acoustic fence was requested by Fenland District Council's Environmental Health Officer and they were a statutory consultee, it was likely a planning contravention notice would be served in order to gather the necessary evidence to determine whether further action was required.

It was resolved

To note the report.

123. Summary of decisions made under delegated powers

The Committee considered a summary of decisions made under delegated powers.

It was resolved unanimously to note report.

Upon the conclusion of the Committee, the Chairman and Members paid tribute to the work of the Committee and thanked officers for their support over the course of the previous 4 years.

Chairman

APPLICATION FOR CONSTRUCTION OF IRRIGATION RESERVOIRS BY THE
EXTRACTION, PROCESSING AND EXPORT OF SAND AND GRAVEL;
WIDENING VEHICULAR ACCESS ONTO THE A1123 (HILLROW CAUSEWAY) AT
DOLES DROVE; MINERAL PROCESSING PLANT, WEIGHBRIDGE AND THREE 6
METRE X 3 METRE TEMPORARY OFFICE BUILDINGS

AT: Willow Hall Farm, Hillrow Causeway, Haddenham, Ely, CB6 3PA

APPLICANT: Mr W Dennis, Dennis (Haddenham) Ltd

APPLICATION NO: E/3003/18/CM

To: Planning Committee

Date: 29 July 2021

From: Assistant Director, Planning Growth & Environment

Electoral division(s): Soham South & Haddenham

Purpose: To consider the above planning application

Recommendation: That planning permission be granted subject to the conditions set out in paragraph 9.1

Officer contact

Name: Helen Wass

Post: Development Management Officer (Strategic & Specialist Applications), County Planning,
Minerals & Waste

Email: Helen.Wass@cambridgeshire.gov.uk

Tel: 01223 715522

Agenda plans

1. Location Plan (01-18-WHF)
2. Working Proposals (04-18-B-WHF)
3. Reservoir Design (03-18-B-WHF)
4. HGV route options (HGV Route Review Document 15 Fig 01)

1. Background and introduction (including process and publicity)

- 1.1 The application was submitted on 20 April 2018 with an environmental statement (ES). The applicant had not sought pre-application advice or an environmental impact assessment (EIA) scoping opinion. The mineral planning authority (MPA) considered that the ES did not meet the requirements of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the 2017 Regulations). An amended ES was submitted on 2 July 2018.
- 1.2 The application was advertised in accordance with Article 15 of the Town and Country Planning (Development Management Procedure) (England) Order. A notice was placed in the Ely Standard on 12 July 2018 and notices erected on Hillrow Causeway at each end of the proposed development area. The occupiers of properties within 500 metres of the proposed development site were notified. The consultation period was 30 days.
- 1.3 The MPA engaged the following specialists to provide independent advice:
 - i) Reading Agricultural Consultants – agricultural need
 - ii) Air Quality Consultants – impact of traffic on air quality
 - iii) Acoustic Associates – noise
- 1.4 Having taken into account the responses received from the independent advisers, statutory consultees and other interested parties, on 25 April 2019 the MPA formally asked to applicant under Regulation 25 of the 2017 Regulations to provide further information. Following discussions with statutory consultees and the independent advisers the applicant submitted an amended application and ES on 23 August 2019.
- 1.5 The amended application and further information was advertised in accordance with Article 15 of the Town and Country Planning (Development Management Procedure) (England) Order and Regulation 25 of the 2017 Regulations. A notice was placed in the Ely Standard on 12 September 2019 and notices erected on Hillrow Causeway at each end of the proposed development area. All consultees and organisations and individuals who had commented on the original application were notified. Individual respondents were advised that if the new information did not change their views their original comments would be taken into account and only to write again if they wanted to change their response. The consultation period was 30 days.
- 1.6 In March 2020 the applicant submitted amendments to the application to reflect the smaller area of land that the reservoirs would irrigate (the “command area”), following a number of third party landowners having withdrawn from the scheme. Individuals and organisations who had commented on the application were notified. Individual respondents were advised that if the new information did not change their views their original comments would be

taken into account and only to write again if they wanted to change their response. The consultation period was 30 days.

- 1.7 A second request for additional environmental information was made on 8 October 2020 following a meeting with the applicant, Environment Agency, Haddenham Level Drainage Commissioners (HLDC) (the Internal Drainage Board - IDB) and adjoining landowner and his technical adviser. The information was received on 14 January 2021 and included an amendment to the method of working. The amended application and further information were advertised in accordance with Article 15 of the Town and Country Planning (Development Management Procedure) (England) Order and Regulation 25 of the 2017 Regulations. A notice was placed in the Ely Standard on 21 January 2021. The consultation period was 30 days.
- 1.8 The application site is at the western end of the parish of Haddenham in East Cambridgeshire (see Agenda Plan 1). It is proposed that the traffic would be routed west through Earith and Bluntisham in Huntingdonshire and the majority of objections to the application have been made by or on behalf of the residents of those villages. For this reason, the advice of the environmental health officers of both local authorities was sought.

2. The proposed development

- 2.1 The applicant considers that there is a need to secure a long term economic and sustainable source of water for irrigating high value vegetable crops (potatoes and onions) to ensure continuity of production, economic yield and meet buyers' quality expectations.
- 2.2 The proposal as originally submitted in 2018 was to create four winter-fed crop irrigation reservoirs with a total surface area of 25.2 hectares and a capacity of 694,000 cubic metres by removing approximately 1.1 million tonnes of sand and gravel in six phases from within a site of 38.87 hectares over a period of 7 – 8 years. The scheme had been designed to provide irrigation water for 368 hectares of land owned and farmed by the applicant around and south of the reservoirs and rented land in 5 broad locations in the Sutton/Haddenham/Aldreth area. The final design included the creation of a small (approximately 1.8 hectares) of wetland habitat at the southeast corner of the site adjacent to the A1123 and Doles Drove.
- 2.3 As noted in paragraph 1.4 the proposal was amended in August 2019 to address comments raised by consultees the MPA's advisers and interested parties. The proposed development would now be a group of three reservoirs with a surface area some 8.33 hectares less than the original proposal. The reservoirs would be deeper than originally proposed and their storage capacity would be the same. This would allow a larger area of land to be restored to agricultural use, conservation grassland and wetland (5.8 hectares at the northeastern corner of the site). The area of the applicant's holding that would be available for rotational cropping of potatoes was amended to 336 hectares. The location of the rented areas was provided and showed a total of 798 hectares of land belonging to 11 separate landowners. This was amended in December 2019 when the Environment Agency stated that its land close to the Hundred Foot Washes would not be available for growing potatoes and the command area was reduced by 61 hectares. The remaining landowners provided written confirmation that their land would be made available to the applicant to rent as required and

the land is in their opinion suitable for growing potatoes subject to sufficient winter stored crop irrigation water being made available.

- 2.4 HLDC and others raised concerns that the applicant had not demonstrated how the irrigation water would be transferred to the easternmost parcels of rented land. In January 2020 the applicant withdrew the land east of Church Fen Drove from the command area, reducing it by approximately 140 hectares. As noted in paragraph 1.6, the command area was further reduced in March 2020 after third parties had removed their land from the scheme leaving 333 hectares of the applicant's land and 283 hectares owned by two third parties. Allowing for crop rotation 167 hectares of land per year could be used for growing potatoes and onions.
- 2.5 The scheme that is being considered is to create three winter-fed crop irrigation reservoirs with a total surface area of 9.1 hectares and capacity of 432,000 cubic metres of water. This would create an annual crop usage volume of 347,000 cubic metres of water and allowing for a 10% water transfer loss and an 85,000 cubic metres allowance for water retained at the bottom of the reservoirs. 691,000 tonnes of sand and gravel would be removed in phases working anti-clockwise from the southeast corner adjacent to the road over a period of 5 - 6 years (see Agenda Plan 2). Approximately 11 hectares at the southwest corner of the original application area would remain undeveloped except for a temporary topsoil storage mound. Approximately 4 hectares of land at the northeast corner of the site would be restored to wetland and conservation grassland. The layout of the completed reservoirs is shown on Agenda Plan 3.
- 2.6 The change in the method of working referred to in paragraph 1.7 was to address concerns raised by the HLDC and individual landowners about the impact of dewatering on groundwater in adjacent land. The mineral would be worked "wet" i.e. without dewatering. Dewatering would only take place during the less sensitive winter period to enable overburden to be placed in the excavated area and the clay side wall liners of the reservoirs to be constructed.
- 2.7 During the construction of Reservoir A (see Agenda Plan 3) groundwater would be pumped out of the excavation into the adjacent IDB drainage system during October to December. During the spring and summer groundwater would be allowed to recover. During the construction of Reservoir B groundwater would be pumped out of the excavation into either Reservoir A or into the adjacent IDB drainage system during October to February. The Reservoir B void space would be topped up by pumping of clean water from Reservoir A. During the construction of Reservoir C groundwater would be pumped out of the excavation into either Reservoir A, Reservoir B or into the adjacent IDB drainage system during October to March. The Reservoir C void space would be topped up by pumping clean water from Reservoirs A or B. The groundwater dewatering and recharge would be undertaken under an environmental permit which would require monitoring, record keeping, reporting and notification to the Environment Agency.
- 2.8 The reservoirs would be filled in winter months with rainfall and water taken from the IDB system. It would be pumped from an IDB drain and transferred to the reservoir entry point via a new pipeline across the applicant's land. The water would be distributed in summer to the crops which need irrigating via the network of IDB watercourses.

- 2.9 Access to the site from the A1123 Hillrow Causeway would be from the existing farm access at the southeast corner of the site known as Doles Drove. The junction would be modified to provide the appropriate visibility splays onto the A1123. The internal access road would be surfaced for at least 50 metres from the public highway and would be a minimum width of 7 metres for the first 30 metres and at least 4 metres thereafter with passing bays. A wheel cleaning facility would be provided.
- 2.10 The mineral would be processed (washed and screened) on site using plant which would be approximately 6.33 metres at its highest point. There would be a car park, mineral stockpiles (maximum height 5 metres), silt settlement ponds, three temporary buildings and a weighbridge. The hours of operation (reservoir construction and mineral processing) would be 07:00 to 18:00 Mondays to Fridays and 07:00 to 13:00 on Saturdays. HGVs loaded the previous day may leave the site from 06:00 hours Mondays to Fridays. HGVs would not be loaded before 07:00. HGVs would be routed west along the A1123 through Earith, Bluntisham and A1096 St Ives bypass to the A1307 (formerly A14) at Galley Hill (see Agenda Plan 4 Route 1). There would be no activity on Sundays or on bank and public holidays.
- 2.11 Sand and gravel would be exported at a rate of up to 200,000 tonnes per year. This would be a maximum of 50 and an average of 45 loads per day which would amount to 4 or 5 loads (8 – 10 HGV movements) per hour.
- 2.12 It is proposed that the first Reservoir A would be fully functional within 2 years of the commencement of development and the second, Reservoir B within 4 years. Drawing 03-18-B-WHF shows the final reservoir layout and the restored land (Agenda Plan 3). The land to the south of Reservoir A would be returned to arable land using overburden, subsoil and topsoil to restore the pre-development land level. The mineral processing area would be returned to arable land by replacing the stripped soils. The land at the northeast of the site would be restored to conservation and wet grassland using overburden and soils to restore the land to approximately the pre-development land level.
- 2.13 Topsoil and subsoil would be stripped and stored separately. The topsoil would be stored in a continuous mound 3 metres high along the southern (roadside) and part of the western boundaries of the site to create a visual and acoustic barrier during the construction period. The soils would be used to reinstate the land outside the footprint of the reservoirs. Surplus topsoil would be spread on adjacent land within the applicant's holding to increase soil depth. Surplus subsoil would be placed on the upper margins of the reservoirs and the remainder placed in the base of the reservoirs.

3. The site and surroundings

- 3.1 The proposed development site is in flat, open countryside lying between 0 and 5 metres AOD. It is within the parish of Haddenham approximately 2.2 kilometres from the western outskirts of the village and approximately 1.8 kilometres from the eastern edge of Earith. The closest residential properties to the proposed development site are Eight and Twenty Farm on the opposite side of the A1123; six properties within 170 metres to the southwest including Willow Farm Bungalow which is adjacent to the southwest corner; and three properties within the Willow Hall Farm complex 275- 360 metres to the east.

- 3.2 The proposed development site is currently agricultural land in arable use. 60% is classified as best and most versatile agricultural land (grades 2 and 3a) and 40% is grade 3b. It is within flood zone 3 and falls within the Haddenham Level Drainage Commissioners' area. The nearest scheduled monuments (SM) are barrows located south and east of Hermitage Farm 470 metres to 1100 metres from the proposed development site and barrows located between 800 metres and 1 kilometre to the northeast at Foulmire Fen and Small Fen. There are no listed buildings within 2 kilometres of the proposed development site.
- 3.3 The proposed development site is at its closest point approximately 290 metres to the southeast of the Ouse Washes. The Ouse Washes are designated as a Site of Special Scientific Interest (SSSI), Special Protection Area under the EU Birds Directive (SPA), Special Area of Conservation (SAC) and RAMSAR Site, being a wetland of international importance under the Ramsar Convention. This part of the Ouse Washes is managed by the RSPB as a public reserve. There is a public footpath along the Hundred Foot Bank which is close to the southeastern boundary of the Ouse Washes.

4. Consultation responses and representations

- 4.1 A summary of the most recent comments is provided below. Where previous comments are still relevant, they are included.

East Cambridgeshire District Council (Planning)

- 4.2 Of primary concern is the visual impact of the proposed works. Hillrow sits higher than the surrounding open farm land and the supporting visual plans show the extent of the site covering a wide area of undeveloped land. The 3m high soil screening and the 5m acoustic screening are likely to appear highly visible for users of Hillrow. The effect may be lessened by the topographical changes between the highway and the surrounding land. The reservoirs themselves appear to be dug in to the existing ground level as opposed to raised up, minimising the visual impact. Whilst the visual receptors for the site are likely to be limited to users of the road and the footpath along Hundred Foot Drain, consideration should be given to the perceived interruption of the uniform and unspoilt characteristics of the area.
- 4.3 The visual impact of the offices is likely to be more acceptable; the 2.5m high structures would not appear out of keeping with the sporadic agricultural development between Haddenham and Earith.
- 4.4 There are recognisable benefits of the proposal in terms of mineral extraction and providing the farm with a sustainable source of irrigation water to provide the opportunity to grow a greater area of high quality, high value vegetable crops.
- 4.5 If the application is approved it is recommended that conditions are imposed placing a time limit on the temporary office units; the operating hours are restricted to a reasonable level; and those recommended by environmental health.

East Cambridgeshire District Council (Environmental Health)

4.6 There is a noise impact assessment (NIA) and the methodology is sound. The application is for a reservoir on farm land for crop irrigation. The outcome of the construction NIA has indicated that the sound levels produced by the construction of the scheme will not exceed the 70dB criterion in BS5228-1:2014 at the closest residential receptors to the site without mitigation in place. The mitigation put forward is a 5m screen immediately around the construction and a 3m bund running parallel with the boundary of the site nearly all the way from the construction works to Willow Hall Farm. The soil/acoustic mound construction criterion level of 70dB will not be breached and the worst case scenario for the reservoir construction works including the mineral extraction and processing operations will fall below the PPG criterion of background level + 10dBA. The NIA predicts, using noise modelling software, that the operational phase of the scheme will fall below the criterion presented in the PPG during all proposed operating periods. Overall, the noise would be noticeable but not intrusive and based on this there is no objection to the development.

4.7 The noise report is based around noise from typical mineral extraction but how long will the mineral extraction take? One process to form the reservoir or dependent on the sale of the mineral. A Construction Environmental Management Plan (CEMP) covering dust and lighting is recommended along with the following standard construction phase conditions:

“The site demolition, preparation and construction works shall be carried out between the hours of 08:00 to 18:00 Mondays to Fridays and between the hours of 08:00 to 13:30 Saturdays and at no time on Sundays, Public or Bank Holidays without the prior written consent of the Local Planning Authority.

Reason: To protect the amenity of the area.

Any waste arising from the site preparation and construction works shall not be burnt on site but shall be kept securely in containers for removal to prevent escape into the environment.

Reason: To protect the amenity of the area.

No security lights or floodlights shall be erected on site without the submission of details to, and written approval from, the Local Planning Authority to ensure a lighting environment of low district brightness at residential properties.

Reason: To protect the amenity of the area.”

Huntingdonshire District Council (Environmental Protection Officer)

4.8 The relevant documents and information supplied with regard to air quality have been reviewed and whilst the concerns of local residents are appreciated there is not sufficient evidence to object to the application on air quality grounds. It is considered that the proposals will not lead to a breach in national objectives or an unacceptable risk from air pollution, or a significant impact. The application form specifies the hours of operation as 06:00 – 18:00 Monday to Friday and 07:00 – 13:00 on Saturdays. This should be secured by condition.

4.9 The response is based upon relevant guidance including the 2017 ‘Land use Planning & Development control: Planning for Air Quality’ guidance by Environmental Protection UK and the Institute of Air Quality Management, which indicates from the number of vehicle movements proposed, the impacts can be considered to have an insignificant effect and an

air quality report should not be required. Defra recognise that AQ monitoring cannot be undertaken at every location and provide advice with regard to this, along with modelled air quality data for the whole of England. This indicates that Air Quality Objectives are being met in the area therefore all the information provided indicates that the impact on air quality will not be significant and the proposals will not lead to a breach in national objectives or an unacceptable risk from air pollution.

Haddenham Parish Council

- 4.10 Traffic related issues remain the largest concern. The additional vehicle movements generated each day by this proposal would be significant especially upon the villages immediately surrounding the site. Hillrow Causeway, although part of the A1123, has an undulating surface which already requires regular maintenance by County Highways. More HCV movement will only cause this maintenance to be more frequently required. There was also considerable concern regarding the pollution and vibration effects of so many additional HCV movements.
- 4.11 There would be detrimental visual impact to the views across the fen landscape when approaching the Parish along the A1123. The Council, although not qualified to comment upon the technical aspects of the application, would expect the reservoir to be of a size consistent with the agricultural need and not to exceed that which is required. It is noted the area will be developed into a wildlife area eventually and the Parish Council would request consultation and input at this time, along with Haddenham Conservation Society.

Earith Parish Council

- 4.12 The application should be rejected due to the stability of the local road infrastructure; the lack of foundations on some of the houses on Earith High Street will mean excessive noise and vibration when traffic uses the road thus making them less stable. An increase in HGV movements of 90 per day will increase air and noise pollution in the village. Road safety will be compromised due to excessive HGV traffic. This application will also result in a permanent loss of agricultural land which is needed in this area for crop production.
- 4.13 The following are the results of a vehicle assessment that was carried out on Earith High Street A1123 on 10th July 2018:

07:00 – 23:00		23:00 – 07:00	
All traffic	10,212	All traffic	702
Lorries	682	Lorries	119
% of lorries	6.7	% of lorries	17.0
Gravel lorries	253	Gravel lorries	15
Gravel as % of all lorries	37.1	Gravel as % of all lorries	12.6

Earith High Street (30mph) and Bluntisham Rectory Road (30 mph) are not suitable for this amount of traffic, or size of traffic, as it stands and with a proposed further 90 movements per day the road infrastructure will only become more unstable.

- 4.14 Earith High Street has two pedestrian crossings (one to access the shop and one to access the old people's home) and an increase in vehicle movements will impact on the safety of

the residents who use the crossings. The pavements are also incredibly narrow in some parts of the High Street and prams and wheelchairs already need to venture onto the carriageway whilst traversing the High Street. Safety for these pedestrians will also be affected by the increased traffic as the pavements are not adequate due to the road infrastructure. Earith High Street is a very old route and does not have the width capacity to cope with any increase in traffic.

- 4.15 This application must be rejected as the road infrastructure is not adequate to support the amount of proposed extra traffic. The noise and environmental pollution that the increased traffic will bring will also harm residents' amenity. Earith Parish Council are supporting the Road Safety Group to carry out environmental testing in Earith as the levels of Nitrogen Dioxide (NO₂) are incredibly high in Earith and will only get worse if traffic movements are increased.
- 4.16 The County Council have just installed a new cycle path from Earith, through Bluntisham and on to St Ives at considerable expense and the increased air pollution will discourage the use of the path as users will have to suffer the extra noise and pollution that these vehicle movements will bring to the village. The road safety of the users will also be affected as there are many crossing points along the path which will need to be navigated around the increased vehicle movements. Thus, the private enjoyment of outdoor cycle travel and the increased ability to partake in outdoor exercise will be denied to the residents of Earith and Bluntisham.
- 4.17 An alternative route could be used via Block Fen which will take the vehicles away from Earith and Bluntisham.
- 4.18 The Hill Row Causeway A1123 is part of the drought damaged road repair scheme which has highlighted unstable roads that have been damaged due to heavy loads. Work is due to commence on this stretch of road in September [2018]. If HGVs are allowed to use this road then they will cause damage to it immediately after the repairs have been carried out which will result in even more expense for CCC. HGV movements should be rerouted away from Earith and Bluntisham.

Bluntisham Parish Council

- 4.19 Feel strongly that the development be rejected based on the following grounds: Stability of the local road infrastructure; the lack of foundations on some of the houses along Earith High Street will mean excessive noise and vibration when traffic uses the road, thus making them less stable. An increase in HGV movements of 90 per day will increase air and noise pollution in the villages of Earith and Bluntisham. Road Safety will be compromised due to excessive HGV traffic. The A1123 in Earith and Bluntisham are now 30mph and not 40mph as stated in the application. Due to these factors an alternative route to St Ives must be found possibly going via Block Fen in Mepal or using the A10/A14. This application will also result in a permanent loss of agricultural land which is needed in this area for crop production.

Willingham Parish Council

- 4.20 Believe that 50% of the traffic from the site would go through Willingham and object to the application for this reason. The B1050 going through the village is already an extremely

overburdened road both with cars and an increasing number of HCVs. The section of the road next to the river frequently requires repair as it collapses under the weight of the vehicles using it. Suggesting that there are no safety issues is simply wrong. The road is both undulating and quite narrow along the river and once you enter the village the High Street can be congested with vehicles coming through and needing to navigate parked cars. The High Street also sees a lot of pedestrian movement needing to cross the road to gain access to bus stops and facilities etc. These ongoing and widely recognised issues with the B1050 through Willingham will only get worse as approved local developments and Northstowe add to the burden.

- 4.21 When the gravel extraction works were approved at Needingworth it was a requirement of that application that all HCVs were prohibited from travelling through Willingham as it was recognised that this was not a suitable route for accessing the A14. The route has not improved, in fact it has got worse over recent years and is still very unsuitable for the number of HCVs (potentially 90 per day from this site alone) that could be directed along it and through Willingham.
- 4.22 Should approval be given it must state clearly the prohibition on the use of the already overburdened B1050 through Willingham at any time. A weight limit should be applied to the B1050 between Earith Road and Northstowe to prevent HGV traffic going through Willingham. The application highlights again the long argued need for a bypass around the village.

Wilburton Parish Council

- 4.23 Has the following objections:
1. The roads are not suitable for this additional number of daily vehicle movements.
 2. Although the report states that the roads are in a good condition they are not and that particular part of the A1123 is subject to a lot of sinkage and movement due to the type of soil it is built on.
 3. There is no capacity for this amount of lorry movements on any of the surrounding roads.
 4. Local knowledge is that there are more accidents than are recorded on this stretch of road - mainly due to the high camber.
 5. There should be a County wide holistic approach to water conservation.

Hilton Parish Council

- 4.24 Oppose any application that has the potential to increase the already high level of heavy commercial traffic travelling through the village, mindful that the route uses a minor road of B classification. If this application is approved a condition should be applied that resultant traffic movements are restricted to the major routes, classified A. Therefore, the economic viability of the application can be considered on that basis at the outset.

Environment Agency

- 4.25 From a water resources perspective the Environment Agency supports the construction of a storage reservoir in this location. Due to the intensive demand for water during the summer season there is no water available during this period. Therefore, the only way to secure new water is to abstract during the winter months when resources are still available and store it until it is required. This proposed structure [the reservoirs] should not detrimentally affect

local water features (including streams, ponds, lakes, ditches or drains) which includes both licensed and unlicensed abstractions. The abstraction elements will still be subject to an Environment Agency assessment under the Water Resources Act. To date the applicant has not entered into pre-application discussions with the Environment Agency or made a formal abstraction application. Therefore there is still some uncertainty as to whether a license(s) for the construction and operation of the reservoirs will be granted.

Groundwater

- 4.26 The proposal has been reviewed relative to impacts which may be caused by the dewatering activities artificially lowering the groundwater levels during periods of active dewatering. The main area of concern regarding the revised Hydrogeological Impact Assessment (HIA) (Document 31A) is the risk of artificially lowering groundwater levels and the impact this may have on neighbouring abstractors.
- 4.27 The HIA identifies features of concern in section 3.9; the Ouse Washes from an environmental perspective and several surface water abstraction reaches. Section 3.10 does not consider there will be any significant impacts to surface water abstractions where the reaches are not in continuity with the groundwater, which is agreed.
- 4.28 However, for reaches which are in continuity there could be impacts and it is assumed these will be to the east although no survey information is presented to assess this. One concern is the potential impact on the abstraction reach immediately to the south. Whilst there is no survey data assessing the reach's continuity with the sand and gravel aquifer, the mitigation proposed (only dewatering outside of the irrigation season and phasing the reservoir construction) should be sufficient to address adverse impacts. However further information regarding this or agreements between landowners may be required before any dewatering abstraction licence is granted. The applicant has continually been recommended to seek pre-application advice from the Environment Agency on the abstraction proposals both temporary and permanent. The applicant is also advised that additional information that may be required for the licence to be granted includes:
- Update plan 09-18-WHF to show off site borehole locations;
 - Quarterly groundwater level contours derived from groundwater monitoring; and
 - Elevation data of the licenced surface water abstraction reaches within the zone of influence relative to the elevation of the saturated sand and gravel aquifer and interpretation of potential impacts and monitoring proposals if considered necessary.

Further consents may be required with the local Internal Drainage Board regarding the discharges to local surface waters resulting from this proposal.

- 4.29 A key piece of information which could enhance the confidence of this proposal and future licence application would be further investigation between the hydraulic connectivity of the surface water abstractions and the underlying partially confined sand and gravel aquifer. This could be achieved in part through topographic survey of the surface water ditch relative to geological information obtained through the offsite boreholes 13-15 as well as through hydraulic monitoring of the offsite boreholes and (particularly those adjacent to the abstraction reaches) surface water abstraction reaches. This information could then be interpreted against current uncertainties and assumptions of the HIA Document 31A.

4.30 On the balance of the information provided, the proposed mitigation in section 3.11 of Document 31A and temporary nature of the dewatering, is considered satisfactory. It should be noted that this mitigation cannot eliminate the risk of reduced groundwater levels, although any impacts should be temporary following successful completion of the development as proposed. Further protection is considered should the assumptions of the HIA not hold true following annual monitoring and reassessment of the mitigation as per section 3.15.1 if required.

4.31 Following review of the HIA no objection to the proposed development is raised. However, there are some outstanding concerns/safeguards that could be controlled through appropriate conditioning of the development and collection of further information:

Condition 1 - On completion of each reservoir and prior to the filling of each reservoir a report or CQA validation completed by a competent engineer must be provided and approved by the local planning authority providing details of the lining and side wall construction of the reservoirs to demonstrate the reservoir is appropriately lined and sealed from the sand and gravel aquifer by an impermeable boundary of adequate construction as per chapter 3.3 of document 30.

Reason 1 - The development's feasibility and sustainability relies on the ability to ensure the reservoirs are a discrete waterbody disconnected from the surround water environment in this case the sand and gravel aquifer. The current proposed reservoirs are below ground and sub water table.

Advice to LPA - Should the reservoirs be incorrectly constructed and the reservoirs be in continuity with the groundwater the applicant will not be able to abstract from them during the summer irrigation season. If abstraction did occur the EA could take regulatory action, however any incorrect construction related to the feasibility of the development would have to be enforced by the planning authority.

Condition 2 - During and prior to the construction phase an annual monitoring report showing the groundwater levels relative to the agreed trigger levels in the HIA should be produced and submitted to the planning authority. If trigger levels are not met the HIA and mitigation measures should be reassessed and agreed by the local planning authority prior to additional mineral extraction or dewatering. As described in the Hydrogeological Risk Assessment Document 31A dated April 2021 and associated appendix 2.

Reason 2 - This is required to be confident the assumptions in the HIA are holding true and any impacts which have not been identified or are greater than envisaged are assessed and enhanced mitigation put in place if required. This need is identified in the HIA document 31A section 3.15.1.

4.32 The EA has not reviewed any technical appraisal as to whether local groundwater levels may rise as a result of the development leading to the removal of the permeable aquifer and replacement with impermeable reservoirs and whether this would cause any local groundwater flooding concerns. Document 31, section 3.3.20 demonstrates the hydraulic gradient is to the east which is perpendicular to the proposed reservoir development and mineral extraction to the southern boundary of the development site being backfilled with soil overburden. Following construction of the reservoirs flow in this direction is likely to be restricted and will have to flow through a smaller cross sectional area of mineral deposits. In

order to maintain normal flow volumes through the aquifer the hydraulic gradient and groundwater levels must increase up gradient unless this additional flow volume is intercepted and stored in the reservoirs or local surface water reaches which from a water balance perspective has been assessed. However, the HIA indicates water will find its level quickly although no assessment of what this new level will be and no quantitative assessment of whether the new level will be of a concern to neighbouring land owners has been made. The only assertion is levels post construction will not be a concern (see sections 3.11.11, 3.11.13 and 3.12.7 in document 31). Furthermore, the area of greatest thickness of sands and gravels has been selected for excavation and no conceptual model has been considered for the remaining aquifer cross section as to the changes in hydraulic gradient and groundwater level needed to transmit the amount of flow previously through the proposed excavated aquifer. Any rises in groundwater level are likely to be hard to theoretically predict with confidence.

- 4.33 Further Advice to LPA: Mitigation has been built into the method of construction with abstraction occurring between November and March which is outside of the irrigation season. Further mitigation is considered in the form of ceasing dewatering activities in February to allow groundwater levels to recover prior to the irrigation season. The greatest risk will occur during the first season of dewatering which is taking place within the closest proximity of the neighbouring abstraction reach. At the end of this first phase the void is being filled with lower permeability site won material which should further mitigate and artificial lowering of the water table to the south. While the neighbouring landowner to the south does not abstract directly from groundwater the HIA has identified the possible link between the underlying groundwater and surface ditches. There are boreholes on the neighbouring land which have not been included in the monitoring plan. Neither has any assessment been made between the levels of the neighbouring groundwater nor the topographic base of the surface water abstraction reaches. This information may be required as part of any dewatering licence application.
- 4.34 It is not possible to eliminate the risk associated with this proposal and potential lowering of groundwater levels on the neighbouring land for a temporary time period. The groundwater levels in the area are vulnerable to the climatic conditions and management of the local water levels, which locally could be temporally and possibly permanently altered by the development. From the information provided the applicant has identified suitable mitigation measures to ensure any impacts of reduced groundwater levels are temporary and kept to a minimum during the most sensitive part of the construction. The EA would recommend the monitoring and mitigation schedule is agreed between neighbouring landowners to avoid any potential enforcement difficulties arising in the future. The EA has a regulatory role with regard to the development's proposed abstractions. The two main elements of the development affecting groundwater levels can be considered on a short term and long term basis. In the short term dewatering for construction could artificially lower the groundwater levels in the locality including area outside the redline boundary. The risk of lowered groundwater levels will be temporary during the construction and dewatering phases of the development. The EA's regulatory role will be limited here too, as post development the dewatering groundwater abstraction will cease and the reservoirs filled from surface water sources, during the winter high flow season. In the long term a large portion of permeable material is being extracted and replaced with low permeability backfill or impermeable below ground reservoirs perpendicular to groundwater flow. The HIA has identified this restriction means flow would now have to flux around the reservoirs having a change in hydraulic gradient off site outside the redline boundary to the north and south (section

3.11.13 of Document 31). The long term groundwater level changes have not been quantifiably predicted, although the HIA considers this to be of very low concern. This could lead to locally higher groundwater levels as a result. The EA does not have a regulatory role regarding this possible change in long term in groundwater levels as no regulatory activity is taking place therefore any potential issues would need to be dealt with and enforced through the planning regime. Any rises in groundwater level are likely to be hard to theoretically predict with confidence.

Flood risk

- 4.35 In accordance with the National Planning Policy Framework (NPPF), development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. It is for the Local Planning Authority to determine if the Sequential Test has to be applied and whether or not there are other sites available at lower flood risk as required by the Sequential Test in the NPPF. Although no objection has been raised on flood risk grounds this should not be taken to mean that the proposal has passed the Sequential Test. No objection on flood risk grounds but strongly recommend that the mitigation measures proposed in the submitted Flood Risk Assessment (FRA) (Amber Planning, April 2018, Version 1) are adhered to.
- 4.36 Temporary site offices are proposed and appear to be of a portacabin style. As the Tidal Hazard Mapping indicates that this site could flood to a depth of greater than 2 metres a condition should be imposed to ensure that the site offices are securely anchored such that they do not pose a hazard during a flood event.
- 4.37 No objection to this application on flood risk grounds as the proposed reservoirs will be below ground level.

Conservation

- 4.38 Ouse Washes - It should be ensured that as much existing habitat as possible is protected and enhanced. Further ecological enhancements and habitat creation opportunities should be considered. Extended Phase 1 Habitat Survey - April 2018. Although just slightly more than one kilometre away from the site of the proposed development several of the nearby drains have County Wildlife Site status for their important aquatic vegetation communities. Many of these important plant species may also be present on the site of the proposed development. Habitat enhancements should be included in the plans for the site to allow these species to become established at the site.
- 4.39 It should be ensured that any water voles and their habitat are protected during the proposed construction works. As part of the plans for the site habitat enhancements which would benefit water voles and link habitats to the wider ditch network should be included.
- 4.40 The reservoirs will be linked via existing ditches to the Internal Drainage Board Drain system and may be at least partially filled in the winter months (or when water levels are excessively high) by way of gravity feed using a control valve mechanism. The Eel (England and Wales) Regulations 2009 may be applicable to either the filling or emptying of the reservoirs and an eel screen may be required. There may also be a need to protect other fish species.

- 4.41 The submitted Document 11, Ecological Management Plan Including Landscape and Habitat Creation would satisfy the previously requested condition for a landscape management plan.

Contaminated land

- 4.42 The site is located above a Secondary A Aquifer of River Terrace Deposits, consisting of highly permeable sands and gravels. The bedrock underlying these deposits is unproductive clay strata. The site is also located within 500m of the Ouse Washes and is surrounded by numerous land drains. Surface water quality on site must be ensured due to proximal surface water abstractors. The following conditions are recommended:

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted a remediation strategy detailing how this unsuspected contamination shall be dealt with and obtained written approval from the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason: To protect and prevent the pollution of controlled waters from potential pollutants associated with current and previous land uses in line with National Planning Policy Framework (NPPF), paragraphs 170, 178, 179 [now 174, 183, 184] and Environment Agency Groundwater Protection Position Statements.

Advice to LPA: Contamination can still be missed by an investigation and this condition gives the Local Planning Authority the ability to require a new, or amendments to an existing, remediation strategy to address any previously unexpected contamination.

The development hereby permitted may not commence until a monitoring and maintenance plan in respect of water quantity, including a timetable of monitoring and submission of reports to the Local Planning Authority, has been submitted to, and approved in writing by, the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the Local Planning Authority.

Reason: To ensure that the site does not pose any further risk to the water environment by managing any ongoing issues and completing all necessary long-term remediation measures. This is in line with paragraph 170 [now 174] of the National Planning Policy Framework.

Natural England

- 4.43 (5 October 2018) The proposed development site is located within 500m of the Ouse Washes SSSI, SAC, SPA, Ramsar site and therefore has the potential to affect the interest features of this site. European sites are afforded protection under the Conservation of Habitats and Species Regulations 2010, as amended (the 'Habitats Regulations').
- 4.44 In considering the European site interest, Natural England advises that the mineral planning authority, as a competent authority under the provisions of the Conservation of Habitats and Species Regulations 2010 as amended (the 'Habitats Regulations'), should have regard for any potential impacts that a plan or project may have. The Conservation objectives for each

European site explain how the site should be restored and/or maintained and may be helpful in assessing what, if any, potential impacts a plan or project may have.

- 4.45 Natural England supports the views of the RSPB that the site should not be used for wildfowling due to the potential for attracting birds from the Ouse Washes SPA and Ramsar site. To ensure no adverse impact to the nearby internationally designated wetland site, and qualifying bird species, any planning permission should prevent the future use of the site for wildfowling or angling.
- 4.46 Natural England notes and supports the concerns raised by the RSPB that this, and similar mineral excavation proposals, could affect the progression of allocated sites such as Block Fen and Needingworth Quarry (Ouse Fen). In particular, this may have the potential to stall the delivery of landscape scale net biodiversity gain and Ouse Washes supporting habitat through the agreed restoration schemes. Given this potential risk the MPA is urged to ensure that this scheme, if permitted, delivers significant benefits for the natural environment, including the Ouse Washes.
- 4.47 (1 May 2020) It is noted from the applicant's Statement of Revised Information (March 2020) that the project design has been reconfigured following reappraisal of the irrigation water need, and subsequent to a meeting with the EA and IDB in February 2020. The scheme has been reduced in overall scale hence potential impacts are considered likely to be less; other than Section 3 (Proposed Development detail), the conclusions of the original Environmental Statement are broadly unchanged. Central to the amended scheme is a revised layout of the proposed reservoirs and reduced volume of mineral to be extracted.
- 4.48 It is noted that the conservation grassland and wetland area, detailed in the revised Ecological Management Plan (EMP) (March 2020) has been reduced accordingly to c.4ha. Given this the applicant should set out details of a scheme for habitat creation, monitoring and management in-perpetuity that will deliver maximum benefits for biodiversity. The EMP should be amended to include all updates to species survey and mitigation proposals and details of construction and operational mitigation measures including methods, timing of works, lighting, dust control etc. Delivery should be secured through appropriate planning condition/s.
- 4.49 (19 May 2021) Natural England provided a response to the applicant's Statement of Revised Information and revised EMP on 1 May 2021. It was advised that the applicant be requested to review the HIA in the light of emerging evidence regarding the potential for dewatering activities to adversely impact the Ouse Washes SPA and Ramar site through summer flooding. Abstraction in this location, particularly in-combination with other abstractions, could have an adverse impact on the Ouse Washes by affecting river flows along the Ely Ouse. Reduced flows are believed to be affecting bed levels at Denver and therefore the speed of drainage of the Ouse Washes and/or potential for smaller, damaging floods in the early bird breeding season. The EA is understood to be undertaking modelling to investigate this issue and that this has been taken into consideration in their updated response to the applicant's revised HIA (14 May 2021).
- 4.50 The revised HIA acknowledges that, without mitigation, dewatering at the north end of the site could potentially impact on the Ouse Washes; however, the report concludes that implementation of mitigation measures detailed in section 3.11 will ensure that any impact to the Ouse Washes can be considered "insignificantly small". Whilst this may hold true for

the proposed scheme in isolation, the effects of the scheme “in-combination” with other existing (and proposed) abstractions has not been addressed through the Revised HIA. The EA is carrying out modelling to investigate the effects of multiple existing / proposed abstractions on river flows and the impact this may have on the Ouse Washes. The findings and recommendations of this work are urgently required to inform clear mandate and / or guidance with regard to future abstraction applications. An update and timescale for progressing this work would be welcome from the EA. In the meantime, their specialist hydrogeological expertise is looked to for assessing individual applications such as this, and mitigation and monitoring measures to ensure no adverse effect on site integrity.

- 4.51 The EA’s response indicates that proposed surface water abstraction, from reaches that are in continuity with groundwater, could have an adverse impact on groundwater levels, noting that the HIA has not presented survey information to assess this. Whilst the EA considers that the proposed mitigation set out in 3.31 of the Revised HIA is satisfactory, bearing in mind the temporary nature of dewatering, they advise that outstanding concerns / safeguards should be addressed through planning conditions. [see paragraph 4.31 above]

- 4.52 Natural England is supportive of the EA’s advice and recommendations for further information to be secured through planning conditions and are satisfied that fulfilment of these requirements will provide sufficient safeguard to the Ouse Washes from the effects of abstraction through this application, alone and in combination. Subject to delivery of mitigation measures set out in the Revised HIA, being secured through planning conditions, Natural England is satisfied that the proposed scheme will not have adverse effect on integrity of the Ouse Washes SPA and Ramsar site. Therefore no objection is raised to the application.

- 4.53 Natural England welcomes that the Environment Agency has suggested additional pre-commencement planning conditions requiring 1) the restricting of operations until a water quality monitoring and maintenance plan is submitted and agreed; and 2) that no-dewatering is to take place until a Hydrological Monitoring Scheme is submitted and approved. Natural England is satisfied that securing these requirements through planning conditions will be sufficient to demonstrate that the proposed scheme will not have an adverse impact to the Ouse Washes SPA and Ramsar site.

Lead Local Flood Authority (LLFA) (CCC Flood & Water Team)

- 4.54 No objection to the proposed development. The applicant has demonstrated that surface water from the proposed development will be captured within the reservoirs. During construction surface water will be pumped from the reservoirs and processed in a lagoon before either being reused or discharged from site at greenfield runoff rate. Once the reservoirs have been constructed, they will store water for the use of irrigation of the surrounding farmland. In the event that the reservoirs fill there will be an overflow weir discharging water into the neighbouring watercourses at greenfield rates. The submission of a surface water drainage scheme should be secured by condition.

Haddenham Level Drainage Commissioners (Internal Drainage Board (IDB))

- 4.55 The effective operation of water control when filling and emptying the proposed reservoirs is of paramount importance in terms of reviewing the impact of this proposal on the local area. Water is managed in the area under the control of the IDB by lowering water levels between

September and March then letting the levels build up for the summer period. This is possible because when the fen was drained, inlets were installed to allow water to flow back into the drainage district from the Old West River and the Hundred Foot River in order to raise the water levels in the dykes and keep the growing medium moist enough to grow crops.

- 4.56 As yields have increased and the demand for summer irrigation has become more prominent so has the need for water availability. By carefully managing the inlets the IDB has been able to provide for the needs of all the farmers who have summer licences, notably during the dry summers of 2018 and 2019. At no time were the farmers in the district put under any Environment Agency restrictions as was the case for other IDBs in the South Level. Maintenance of summer water levels is dependent on the EA being able to maintain the water level in the Old West River and allowing water through the inlets. It is understood that the EA is highly unlikely to sanction increased quantities being taken from the river, so any further water supply must come from winter storage.
- 4.57 The IDB has agreed with the applicant in principle that winter fill water would be taken from the Division Drain via a dyke owned by the applicant which will need to be improved. Water would be let out of the reservoirs into another applicant-owned dyke, also to be improved, and then on into the Haddenham system. The IDB wish to have full control of discharge from the reservoirs and this would be the subject of a written agreement between them and the applicant. This high degree of control is needed as the IDB currently operates six inlets from the Old West River and two from the Hundred Foot River. The amount of water let into the system has to be controlled on a daily basis to ensure that the lower areas do not flood, but that sufficient water is available for irrigation on the higher areas. Differing levels are maintained by dams throughout the district.
- 4.58 An agreement between Dennis (Haddenham) Ltd and The Haddenham Level Drainage Commissioners has been signed; its purpose is to regulate the operation of the reservoirs post-construction.
- 4.59 The initial concern about the impact on summer ground water levels has been partly addressed by the change to removing the gravel without dewatering. However, the Commissioners still need to be assured that ground water levels from April until September will not be affected. To ensure this does not happen, dewatering must only be only permitted from October to December and not extended to include January, February and March.
- 4.60 The Commissioners resolved that dewatering from October to December would be acceptable but that the planning committee should be asked to reject the application if the dewatering period is to be extended to February/March. They therefore object to the application as it stands. If the Commissioners could have the confidence that this important point is addressed, then they would be able to remove their objection.

Ecology Officer

- 4.61 The reduction in the quarrying activities, outside of Minerals and Waste [Plan] allocation sites, associated with the revised layout of the reservoirs is welcomed. The area of conservation grasslands has been reduced to 4 hectares and will be created using excess overburden and subsoils (after minerals have been extracted from the area). The proposed

relocation of the conservation grasslands away from the road and towards the Ouse Washes SSSI is supported.

- 4.62 The Environment Agency and Natural England's advice on the potential impact on the Ouse Washes SSSI should be taken. It is disappointing that features for wildlife have not been incorporated into the design (as previously recommended by the RSPB).
- 4.63 A dust management plan must be implemented to minimise any potential adverse impacts; the implementation of the Document 12 - Dust Management Scheme (submitted in July 2018) should be secured by condition.
- 4.64 The updated Ecological Management Plan (EMP) Document 11 (B) reflecting the changes to the reservoir layout is welcomed but it does not provide any specific detail about ecological constraints at the site. Its purpose is to provide information on the ecological interest of the site and how it will be managed throughout the development. This should be based on 'Construction Environment management Plan for Biodiversity' as set out at British Standard BS2020:2013. The following further information is required:
1. Where nesting birds have been found, what protection measures will be implemented, for example:
 - a. What minimum size of the exclusion zone?
 - b. Will the nest be monitored / how long will the works be excluded?
 - c. What specification of protection fencing will be used?
 2. What process will be used to locate the amphibians (e.g. strimming and finger-tip search). Details of the receptor site should be provided.
 3. Consideration should also be given to reptiles, particularly during vegetation clearance and removal of ditches. Methodology for this should be provided.
 4. A map should be provided to identify the ecological constraints and the protection features (e.g. protection fencing) for the site.
- 4.65 The Water Vole survey undertaken in 2017 has become out-of-date with both wet ditches scheduled to be removed (WD1 and WD2) likely to have become suitable habitat for Water Voles. If Water Voles are present a mitigation strategy should be produced and secured through by condition requiring all survey work and mitigation strategy to be completed prior to the commencement of any ground clearance works on the site (given that ditch clearance will begin in Stage A).
- 4.66 The revised location of the cohesive block of conservation grassland (drawing 06-18-B-WHF), which is far more suitable to achieve its conservation objectives is welcomed. The information provided within the Ecological Management Plan (Document 11B) with regards the proposed landscape scheme and habitat management is welcomed, but further details of the restoration scheme should be secured through a suitably worded condition to ensure long-term success of the biodiversity features. Including (but not limited to):
- Soil / landscape specification demonstrating how a low-nutrient soil profile will be created from on-site subsoils and top-soil, to enable wildflower grassland to establish, including:
 - o soil testing to create acceptable pH / nutrient-levels for the soil
 - o measures to reduce residual fertility (e.g. growing a crop prior to sowing)
 - o treatment of high weed burden associated with arable reversions to meadow
 - Landscape specification for the hedgerow
 - Details of the scrapes, including:

- o size and profile
- o expected water-levels (taking into consideration climate change projections)
- Final levels of restored land
- Take into account water vole mitigation strategy (if required, see above).

- 4.67 The proposed natural regeneration is supported but would urge caution about transporting plants from nearby ditches. It would be useful to translocate some key plants but this must be undertaken sensitively to avoid impact on the ditch and its associated species (e.g. Water Voles) and avoid transplanting species that can quickly become invasive and swamp the scrapes (e.g. bulrush, reeds and *Crassula Helmsii*).
- 4.68 Monitoring - Disappointingly, the proposed habitat monitoring contained within the EMP has not taken on board previous recommendations by PCC's Wildlife Officer James Fisher. All habitats (grassland, open water / scrapes and hedgerows) should receive annual habitat assessments to determine whether establishment is taking place or whether any remedial action is required, such as re-seeding, replanting or weed control. The EMS should be updated to reflect this. Alternatively, this more detailed information could be secured through a suitably worded condition for a Landscape and Ecological Management Plan. In addition, the habitats should be assessed against specific target conditions, so that it possible to ascertain whether they have reached their goals or whether remedial action is required. For example: - Percentage of open water retained / percentage coverage by macrophytes or emergent vegetation - Target NVC grassland / maximum percentage of weed species or shrub etc. - Percentage of hedgerow whips to be replaced (if dead / dying or diseased) during beat-up / when begin formative pruning
- 4.69 Conclusion - Further detail is needed in the Ecological Management Plan to address the concerns set out above. If planning permission is granted the following should be secured through suitably worded conditions:
1. No ground works undertaken prior to the completion of Water Vole surveys and the survey report and Water Vole mitigation strategy submitted to and approved in writing by the LPA.
 2. Implementation of the Dust Management Plan
 3. Landscape and Ecological Management Plan (to provide further details of the submitted Ecological Management Plan) should be submitted to and approved by the LPA*. This should be implemented in full for a minimum of 5 years
 4. Detailed restoration scheme, including final restoration levels, creation of soil profile for conservation area and details of scrapes.
- 4.70 In September 2020 East Cambridgeshire District Council adopted a Natural Environment – Supplementary Planning Document which is a material planning consideration. Policy SPD.NE6 Biodiversity Net Gain states that all developments should be “providing measurable net gains for biodiversity” and “where insufficient, incomplete or inaccurate information is submitted, meaning the Council is not able to determine whether a proposal is likely to lead to a net gain in biodiversity, a proposal will be deemed to fail the policy requirements”.
- 4.71 No Biodiversity Impact Assessment has been submitted as part of the planning application and therefore, the proposed development does not clearly / robustly evidence how the scheme will deliver net gain and as such does not accord with Policy SPD.NE6. Therefore,

an objection is raised until clear and robust evidence setting out the delivery of net gain in biodiversity (as set out in paragraph 3 of policy SPD.BE6) is submitted. This evidence should be supported by a suitable biodiversity net gain calculator based on the latest Defra metric.

Royal Society for the Protection of Birds (RSPB)

- 4.72 Having read the further information submitted by the applicant, withdraws earlier objection to this application subject to the provision of conditions:
- Mandating further baseline monitoring and instigation of a hydrological monitoring scheme as suggested by the Environment Agency
 - Restricting future use of the reservoirs and habitat creation to preclude angling and wildfowling, as suggested by Natural England.
 - Providing a monitoring scheme to ensure the successful establishment and management of the habitat creation on-site, as suggested by the County Ecologist.
- 4.73 Despite the reduction in the scale of the proposed extraction, the RSPB retains strong concerns with regards to the impacts this un-allocated site proposal may have on the timely completion of the Block Fen masterplan and the significant habitat creation opportunities this allocation will deliver. As such, we do not believe that the application is in line with County Minerals Plan policy.
- 4.74 Water Management - support the provision of a condition on consent mandating further baseline monitoring and an ongoing hydrological monitoring scheme, as re-iterated in the Environment Agency's representation of the 10/01/20. This is to ensure that the hydrological effects of the development are as modelled, with provision to take further mitigation action should this not be the case. This would ensure compliance with minerals plan policies CS1 and CS3.
- 4.75 After-use and of Reservoirs and Habitat Creation / Monitoring - support the provision of a condition restricting after-use of the reservoirs and habitat creation to preclude angling and wildfowling as set out in the representation from Natural England 25/09/19. This is to ensure no impacts on the conservation objectives of the Ouse Washes SPA/SAC. In addition, a condition is required to mandate regular monitoring of the habitat creation to ensure that the planned habitats are established successfully and managed appropriately, extending to 25 years after their creation.
- 4.76 Impacts on County Minerals Plan Allocations - Despite the reduction in the size of the proposed minerals extraction by almost a third, still hold strong concerns regarding the impacts this non-allocated site may have on the timely implementation of the Block Fen masterplan, and the significant wet grassland habitat creation opportunities arising from this, by significantly increasing the supply of sand and gravel in the area. As per previous representations, believe this means that the proposal does not comply with policies CS1, CS4 and CS13 of the adopted County Minerals Plan.

CCC Transport Assessment Officer

- 4.77 Transport Statement Review - Automatic traffic count was undertaken on Station Road from 12/10/2017 to 18/10/2017. The latest 60 months accident data has been provided and no cluster sites have been identified. The proposal will involve the exportation of up to 200,000

tonnes of sand and gravel per annum. The temporary construction works are estimated to last a temporary period of 7-8 [now 5-6] years. Access to the site for the proposals will be a new junction onto Hill Row Causeway, from Doles Drove. A formal bell-mouth junction will be provided with a 7.3m road width with 15m radii. The junction has been designed to prevent HGV access to the east. The site access junction has been tracked with a maximum legal articulated vehicle which shows two vehicles can both enter and leave the site in forward gear without conflict.

- 4.78 It is proposed the site will generate 900 tonnes a day, transported in 20 tonne loads. The site will therefore generate on average 45 HGV loads per day. It is assumed 10% is generated during peak periods, this equates to 9/10 two way movements. This equals one HGV every 6 minutes. In terms of vehicle routeing it is likely that traffic associated with the proposals will route to the west towards St Ives and hence through Earith and Bluntisham.
- 4.79 The site access design has been reviewed in the context of Design Manual for Roads and bridges TD 42/95. Figure 2/2 indicates that a simple priority junction is appropriate where major road 2-way flows do not exceed 13,000 vehicles/day and where minor roads do not exceed 300 vehicles/day. The ATC shows Hill Row Causeway carries 3,600 vehicles/day. The proposed traffic generation for the site is 90 HGVs and 6 staff movements, equating to 96 movements per day. On this basis, the site access design is wholly appropriate to serve the site.
- 4.80 Conclusion: The proposal would not result in a severe impact on the highway network therefore no objection to the application as submitted.

CCC Highway Development Engineer

- 4.81 The original junction design would have prevented right turn in by HGVs but in doing so may compromise legitimate right turn in by other smaller commercial vehicles which are not constrained by the routing agreement. There is nowhere convenient location for vehicles to U-turn to the west of the site and come back to use the left-in arrangement. They may therefore try to make the turn, and potentially compromise the use of the through road in doing so. The constrained junction geometry on the east side may also push larger vehicles legitimately turning left out of the site into the opposing traffic flow. As noted above, HGV traffic delivering locally could also potentially turn left, and the layout would not allow them to do so safely. The development would be better served by a conventional junction with a routing agreement, provided that the planning authority are confident that this could be enforced. The revised junction design (Proposed Site Access 19413-02-1 Rev D July21) is acceptable.

CCC Historic Environment Team

- 4.82 The archaeological evaluation report describes work undertaken between September and November 2018 in which the ground water heights hindered close scrutiny of the lowest deposits across the site. However, very useful evidence was found that indicated the presence of a newly mapped east-west tributary of the prehistoric Gt Ouse river crossing the southern part of the site. Figures 5-8 of the report produced by Pre-Construct Archaeology Services (dated May 2019) demonstrate the c. 150m wide channel and its relative depth (at least 3m below ground surface), though the deepest part of the channel could not be established in the evaluation. Associated with the channel were former dry

land surfaces preserved beneath a series of later fen deposits of peats and alluvial layers. Human occupation evidence was seen in the discovery of 101 struck flints and 21 sherds of pottery – all found on the north bank of the river channel. No cut features (pits, ditches, postholes) were found, though these should be anticipated as being present given the relatively high levels of material culture recovered from the work. Animal bone was also present, though whether from natural deaths or human agency cannot be established.

- 4.83 Across the site, the trenches revealed large waterlogged trunks and boughs of oak, ash, willow/poplar and alder were found with distinctive deposits of ‘bear’s muck’, a detrital woody peat, indicative of the drowning of deciduous prehistoric woodland that had been present in a former dry land area adjacent to riparian belts that flourished along the river channel. Two dendrochronology dates were obtained from stressed oak trees, indicating that the environment was changing from intermittently wet to permanent high ground water conditions and the development of the marsh around the end of the 3rd millennium BC. Dates of 2058 - 2014BC show that by the end of the Neolithic /start of the Early Bronze Age period dry land conditions had been replaced by fen and marsh conditions. It is likely that the spring-fed lake recorded as being present within the development area emerged at this time, though may have only been short lived, as both it and the river channel became gradually choked with reed growth and peat development. No further human occupation is evident until the earliest land drains were inserted, a considerably long time after the adjacent 17thC drainage scheme of the Hundred Foot Washes was installed. While the large timbers are sought after by wood carvers and sculptors, there is no archaeological interest in this wood as none of the examined evidence exhibited felling, structural use or any indication of human agency.
- 4.84 The development area is located in an important archaeological location, surrounded as it is by numerous scheduled monuments of Neolithic long barrows (burial mounds: the excavation of one at Foulmire Fen revealing a large preserved wooden mortuary structure and internal inhumations: HER ref SM1019983) and cemeteries of Bronze Age round barrows. Additionally, a large Neolithic causewayed enclosure (ceremonial monument) is located close by in the Lower Delphs. Furthermore, these sites are contemporary with a wider range of prehistoric settlement and funerary activity that has been investigated over many years in Needingworth Quarry to the southwest of the proposed development area, where recent evaluation has revealed the presence of preserved prehistoric fish weirs constructed in one of the smaller tributary channels of the large main ancient Gt Ouse channel.
- 4.85 However, the archaeological interest of the proposed development area has been mapped as occurring solely along the northern margin of the river, where a spit or area of occupied, former dry land surfaces displayed significant evidence of human activity. As the mineral extraction pits to form reservoirs will have a total impact on the remains, the river and its north bank should form the focus of an archaeological mitigation strategy that can be secured by a suitable planning condition should the scheme obtain planning consent.
- 4.86 HLDC are concerned about the rate and extent of potential de-watering in the district and land holdings around the development area, while Enzygo and Stantec have both indicated that hydrogeological modelling suggests that this will be limited to a radius of 144m, that will be controlled via various mitigation measures established by monitoring. Additionally, the Environment Agency, RSPB and Natural England have raised concerns about the draw-down effects on summer water levels in the nationally and internationally designated Ouse

Washes: an important wetland habitat and ecological zone. Using the details soils, pollen and geoarchaeological and geophysical evidence contained in Document 24 report, it is believed that the results of the HIA regarding dewatering and draw down effects can be challenged.

- 4.87 Attention is drawn to hydrological monitoring research that was undertaken by Professor Charles French of the University of Cambridge that expressly focussed on the effects of water draw down through quarrying activity on waterlogged archaeological remains in various locales of the Cambridgeshire fens - an area in which some of the best British prehistoric sites are preserved. One of the Case Studies contained in a paper commissioned by the journal WIREs Water is based in Over parish within the Needingworth Quarry 3km to the south west of the application site. This study used a multi-parameter monitoring programme that is described in the report. The results showed: "...groundwater levels fell by up to a three-fold factor (to more than 5m below the modern ground surface) with a draw-down 'halo' extending up to 500-600m beyond the quarry face, and up to 1,500m downstream. During quarrying, there was increased fluctuation in most parameters: especially higher levels of dissolved oxygen and positive redox values (Figs. 5-7), and a lowering of soil moisture levels throughout the floodplain and archaeological sequences. Moreover, the moisture regime reacted differently depending upon whether it was within the peat or the more moisture retentive silty clay alluvial overburden or well drained sandy loam palaeosols and feature fills, or the free-draining sand/gravel substrate."
- 4.88 The Lessons Learnt and Outstanding Issues section remind local authority historic environment curators and advisors that development impact can be unseen and far reaching, requiring appropriate mitigation strategies where impacts cannot be avoided through preservation in situ schemes and also to protect off-site heritage assets. Baseline monitoring for a period of two years before and subsequent to quarrying/dewatering is advised to be able to devise and apply suitable hydrological mitigation measures. Earlier advice recommends archaeological mitigation via a planning condition, the nature of which is yet to be defined, so this is not an issue here. It is important to note, though, that known off-site archaeological sites and monuments - including nine prehistoric scheduled barrows (burial mounds) and ceremonial sites, as well as the Civil War fort at the south end of the Old and New Bedford Rivers of the former Hundred Foot or Ouse Washes - occur just beyond the 500m halo draw down effect (all within a 1.5km radius), while as yet unknown assets within the radius may well suffer. It is unjustifiable, however, to request that a broader evaluation is undertaken to define what may be lost as evaluation is likely to destroy more than can be protected via this development.

Air Quality Consultants

- 4.89 The applicant's Document 20 – Air Quality Assessment (AQA), dated 14th May 2019 has been reviewed. The AQA addresses previous concerns regarding the lack of information about the air quality impacts of additional HGV movements generated by the proposed development. The AQA has presented the results of dispersion modelling based on an additional 76 HGVs per day* travelling through the village of Earith. The model follows an appropriate methodology, including the inclusion of 'canyons' within the model and results have been verified against local monitoring data from the "Woodlands Lampost Earith High Street" monitoring location.

[*Annualised therefore spreads the traffic over 365 days rather than operating days.]

- 4.90 The model results indicate that, whilst concentrations are elevated within the 'canyon' sections of the village, the relevant air quality objectives are not being exceeded. The maximum predicted changes in annual mean nitrogen dioxide and PM10 concentrations as a result of the increase in HGV would be 0.37 ug/m³ and 0.06 ug/m³ respectively. These changes are considered 'negligible' (as classified by IAQM guidance) and would not affect compliance with the objectives. On this basis, the impacts are described as 'not significant'.
- 4.91 The approach to the air quality assessment and its conclusions are appropriate. Therefore, additional traffic generated by the development would not lead to significant air quality impacts.

CCC Public Health

- 4.92 Nothing further to the technical comments from Air Quality Consultants. The predicted increases to NO₂ and PM10 are considered negligible and therefore any adverse health effects to the general population are likely to be negligible.

Acoustic Associates

- 4.93 (April 2019) The initial noise impact assessment carried out by REC Ltd for the applicant assesses the noise impact from the construction of top soil and subsoil mounds and subsequent operation of the reservoirs including the haul road but not the impact of increased traffic.

Site operations

- 4.94 REC Ltd's noise survey shows LAeq,T ranging from 63.3 dB(A) to 69.8 dB(A) and LA90,T (background noise levels) ranging from 35.7 dB(A) to 50.6 dB(A) during the proposed operating hours. They then use 44.5 dB(A) as an 'average' background noise level. This level is considered to be too high. Statistical levels should not be averaged arithmetically. It is more appropriate to carry out a statistical analysis of the 'most likely' or 'typical' LA90. Such an analysis of the LA90 levels measured by REC Ltd. reveals a 'typical' level of 43 dB(A). Background noise levels near the proposed site (Location 3, see Figure 1) were measured over a 30 minute period from 11:08 to 11:38 hours on 20th March 2019. The measured LA90 was around 39 dB(A). It is considered that REC Ltd. used a background noise level that is too high by at least 2 dB to assess the noise impact of the operational phase of the site against it, therefore the assessment is not robust enough.
- 4.95 The noise sources assessed and their sound power levels used in the assessment have been compared with similar equipment listed in the BS5228-1 tables and there were no large discrepancies found. It is considered that the noise data and estimated on times used are robust.
- 4.96 In their assessment REC Ltd point out that it is inevitable that there will be some disturbance caused to those nearby during the clearance and construction phases of the site. A noise limit of 70 dB(A) LAeq,T over the working day (08:00 to 18:00 hours Mon-Fri and 08:00 to 13:00 Saturdays) from BS5228-1 is adopted. The PPG for minerals also allows for a temporary fixed noise limit, albeit a one-hour average limit (70 dB(A) LAeq,1 hour).

- 4.97 The noise impact is assessed at three residential locations to the southwest (Willow Farm Bungalow), to the south (Third Bridge Holiday Home) and to the southeast (Willow Hall Farm). A worst case assessment has been carried out assuming all noise sources are at the closest distances to the receptors. The highest calculated LAeq,10hr is 70 dB(A) at Third Bridge Holiday Home, exactly at the noise limit, without any allowance for a margin of error. Reviewing the calculations using standard propagation formula we have calculated levels 3 dB higher than REC Ltd, thus exceeding the criterion at Third Bridge Holiday Home by 3 dB. It is, however, unlikely that all machines will be working at the same location closest to that receptor (45 m north of Third Bridge Holiday Home). It would be more appropriate to model the noise propagation from the machines as line sources along the southern boundary of the site. This has been done by Acoustic Associates using the sound power levels quoted in the REC report. The noise contours show that the noise level at the southern receptor (Third Bridge Holiday Home) is between 60-65 dB(A), which would be within the limit.
- 4.98 It should, however, be noted that the 70 dB(A) limit can be used only for temporary works, the PPG suggest a period of up to 8 weeks. The applicant should confirm how long the construction and earth mound forming phase will last and should agree that period with the local authority.
- 4.99 The predicted noise levels from the operational phase are underestimated by REC Ltd. The same sound power levels, on-time assumptions and locations were used in our model carried out using IMMI 2016 software (also using calculation formulae from ISO 9613-1. The model includes the 3m bund at the southern border and 5m barriers around the processing area. The predicted noise levels are shown in the table below, compared with levels predicted levels by REC Ltd.

Receptor	Calculated LAeq,1hr, dB(A) (REC Ltd levels in brackets)	Criteria (LA90 + 10 dB)	Difference + / - (dB)
South West – Willow Farm Bungalow	53 (46)	54	-1 (-8)
South – Third Bridge Holiday Home	58 (52)	54	+4 (-2)
South East – Willow Hall Farm	48 (39)	54	-6 (-15)

There is a large discrepancy between the two models. In our predictions, the LA90 + 10 criterion as well as the absolute limit of 55 dB(A) is exceeded. The main noise sources are the Volvo loading shovel and Volvo dumpers. The contribution from the haul road is negligible in comparison.

- 4.100 The night time (6am – 7am) noise level calculation from the haul road were verified. Some REC Ltd calculations and assumptions are unclear, e.g. they quote a sound power level of a 32t HGV as 106 dB SWL @1m. Sound power level does not depend on the distance. Furthermore, they then use a value of 104 (rather than 106) for calculations. 106 dB SWL is considered robust for this type of HGV. Using this value, assumed speed, quantity and distances as in the REC Ltd report, the Acoustic Associates model calculated similar noise levels within + / - 3 dB of the levels calculated by REC Ltd. The night time levels are within the limit of 42 dB(A).
- 4.101 Conclusions for site operations - The noise data related to machinery, the assumed on-times and locations used by REC Ltd were found to be robust. The local authority should require clarification from the applicant on the planned duration of earth mound construction and should agree on a maximum construction period. There is a large discrepancy between calculation models of the site operation from REC Ltd and Acoustic Associates, despite using the same input data and assumptions. REC Ltd should submit calculation details and / or CadnaA metadata to show how their predicted levels were obtained. It is possible that further mitigation measures will be required to reduce the operation noise by at least 3 dB.
- 4.102 (28 May 2019 – response REC Ltd response to April 2019 report) If mound construction should last for more than 8 weeks, an additional assessment should be undertaken. This of course means, that additional mitigation should be undertaken as well. This is satisfactory.
- 4.103 The input information given by REC Ltd does not extend much above what they have already given in their initial report. For example, distances between source and receiver are not given. A barrier attenuation is given as 8 dB, which is a reasonable assumption. The ground absorption is clarified as 1.0 (previously 0.6 was stated), which is also a reasonable assumption for a rural area.
- 4.104 Distances have been estimated from available maps. Assuming the distance between the Willow Hall Bungalow and the nearest machinery is approximately 140m and the distance between Third Bridge Holiday Home and the nearest machinery is approximately 88m, the noise levels calculated using simple propagation formulae ($L_p = L_w - 20\log(d) - 11 - 8$) confirm REC calculations within +/- 2 dB. The predictions carried out by REC Ltd are satisfactory.

Road traffic noise

- 4.105 The impact of the increased traffic arising from the operation of the site was not addressed in the noise impact assessment carried out by REC Ltd. In a reply to the East Cambridgeshire Joint Villages HCV Group, REC Ltd argued that taking into account that the existing levels in Earith due to traffic are significantly above 60 dB(A), an additional 90 HGV movements daily would not be significant. Rupert Thornley-Taylor [on behalf of an objector] has stated that the significance of impact will depend on what the percentage of heavy goods vehicles will be with the added daily 90 movements associated with the site. He has concluded that “The information submitted in support of the application is not capable of correctly informing a valid planning decision”. He hasn’t, however, explicitly stated that the impact will be significant.
- 4.106 To assess the significance of the noise impact from the HGV movements, it has to be compared with the existing road traffic noise levels, taking into account the current traffic

flows and percentage of HGVs. Rupert Thornley-Taylor quotes WHO Environmental Noise Guidelines for the European Region (ENG) recommendation that traffic noise levels should be reduced to less than 53 dB LDEN and that above 59.3 dB LDEN, there is a 5% increase in Relative Risk of incidence of Ischaemic Heart Disease. Based on noise monitoring data presented in the Joint Villages HCV Group document (1st March 2019), the existing daytime levels range between 65.6-67.5 dB(A) LAeq in Earith and between 54.4-69.8 dB(A) LAeq in Haddenham. Acoustic Associates carried out noise monitoring in Earith where the average daytime noise level during possible operation and HGV transport hours (06:00 – 19:00 hours) was found to be 62 dB LAeq,T at a location approximately 10m from the road. Additional short term attended measurements were carried out at a second location 5 m from the road. The measured 30-minute average noise level was 68 dB(A) LAeq,T. The noise survey validates the noise levels presented by the Joint Villages HCV Group and confirms that the existing noise levels are significantly above the WHO guidance values. If the additional HGV movements contribute to a further increase of traffic noise levels, that would be considered significant.

- 4.107 The applicant's traffic statement shows automatic traffic count results in Haddenham which recorded an average of 306 HGV movements with an average total 3109 vehicle movements during 12 hour days. This gives approximately of 10% HGV movements. With the additional 90 HGV from the proposed development, the number of HGV would increase by 29% and the total HGV percentage increase to 13%, which would be equivalent to approximately a 1 dB noise increase.
- 4.108 A short term traffic count was carried out during attended measurements in Earith. A total of 24 HGVs were observed during a 30 minute period from 10:05 to 10:35 hours. Over a 12 hour period this could therefore mean up to 576 HGVs. With that count, the additional 90 HGV movements would cause a 16% HGV increase and <1 dB increase.
- 4.109 The above estimations are very broad due to lack of comprehensive traffic flow data along the A1223. However, they show that it is unlikely that the HGV movements related to the proposed development would have a significant impact.
- 4.110 The noise impact from the HGVs was also modelled in IMMI 2016. The sound power level of 106 dB of a single HGV was used. A 40 mph speed limit and 90 daily movements were assumed. The predicted noise levels compared with existing noise levels are shown in the table below.

Location	Predicted LAeq,12hour from HGV, dB(A)	Existing road traffic levels LAeq,12 hour, dB(A)	Combined noise level LAeq,12 hour, dB(A)	Contribution of HGV, dB
10 m from Earith High Street (A1223)	42.8	62	62.1	0.1
5 m from Earith	52.3	68	68.1	0.1

High Street (A1223)				
---------------------	--	--	--	--

- 4.111 It has been shown that the road traffic noise is not likely to increase more than 1 dB due to the HGV movements related to the proposed site. The road traffic noise levels are already very high, significantly above recommended values by the WHO, however, the contribution of the additional HGVs will be insignificant.
- 4.112 As an independent expert Acoustic Associates have reviewed the applicants' noise assessment report as well as other documentation and have pointed out problems with the noise emission predictions from the proposed site itself (this was later addressed by the applicant). However, the issue of increased traffic on the A1123 is, in our professional opinion, insignificant from a noise point of view. This conclusion is supported by strong evidence in our report.

East Cambridgeshire Joint Villages HCV Group

[The HCV Group has made six representations on this application, including detailed reports and analyses which it is impractical to summarise in this report. The documents are on CCC website so are in the public domain but on 15 July 2021 were sent to members of the Planning Committee along with the Individual Representations pack for ease of reference and to ensure that full information has been supplied in advance of a decision being reached. Below is a summary of the Groups' main themes.]

- 4.113 (9 August 2018) The HCV Group is not opposed in principle to the creation of agricultural reservoirs to mitigate the effects of drought, but it is objecting to this application on the grounds that it will be detrimental to human health and the environment due to the increased HCV traffic generated which will have to pass through the centres of local villages during the construction phase. The evidence for damage caused to health by excessive noise and air pollution is now overwhelming and was addressed in terms of a national health crisis in the 2017 Annual Report from the UK Chief Medical Officer (CMO) which was entitled 'Health Impacts of all Pollution – what do we know?'
- 4.114 HCV Impacts on Villages - The application states that there will be an average of 90 additional HCV movements through Earith and Bluntisham for a period of 7 to 8 [now 5 to 6] years. A recent count undertaken on 9th May 2018 recorded just over 700 HCV movements through Earith of which around half were bulk transporters carrying aggregates. Should this application succeed there would be an increase in the number of daily HCVs of the order 13% for a 7 to 8 [now 5 to 6] year period. The stated operating hours in the application are 6am to 6pm Monday to Friday and 7am to 1pm on Saturdays. Because drivers arrive earlier than the site operating times in order to pick up their first load of the day and avoid traffic, there will be significant HCV movements though the villages from 5.30am onwards adding to the already severe health stresses on residents.
- 4.115 Environmental Testing Results - In 2012 the HCV Group undertook a programme of environmental testing in six local villages to measure levels of nitrogen dioxide, noise, particulates and vibration caused by road transport. The monitoring discovered worrying levels of all these types of pollution in places which were assumed to be and which should be relatively pollution free. Exposure to particulates, particularly those smaller than 2.5

microns in size, (PM2.5), has been implicated in a number of serious health conditions and it was considered to be one of the highest health risk factors by a Lancet report⁶ on Non-Communicable Disease (NCD) causality. The UK Air Quality Regulations (2010) state there is no safe limit for PM2.5, yet the worst measurement recorded on the A1123 was more than twice the current legal limit. More recent measurement of NO₂ levels along the A1123 found high levels at all locations, and a level of 39.5ug/m³ on the approach to St Ives which is only a fraction below the legal limit of 40ug/m³. Noise measurements indicated levels at which previous planning guidance (PPG24) would have prevented the building of homes along some routes and in excess of current WHO guidance for daytime and night time noise.

- 4.116 The HCV Group maintains that the total of additional HCV movements generated by the proposed development over a 7/8 [now 5/6] year period would be somewhere between 150,000 and 180,000 and that this would significantly contribute to unacceptable levels of air and noise pollution in the villages affected. These movements would also generate at least 1,200 metric tons of CO₂ to add to the growing problem of global warming. To ensure that the NPPF conditions are observed, a full environmental impact assessment in relation to air pollution and noise generated by HCV traffic in affected communities should be undertaken before any planning decision is made.
- 4.117 (30 September 2019) Make detailed points criticising Acoustic Associates' report dated 26 April 2019. Conclude by saying that many residents are much closer than 5 metres to the road, including some which are only 2 metres from the carriageway. Noise levels at these locations will be significantly higher than those recorded in the survey as has been shown by the several noise surveys carried out by the HCV Group. HCVs are most frequently the cause of the elevated noise levels.
- 4.118 Welcome Acoustic Associates acceptance that their results are consistent with and validate the results presented by the HCV Group which show that existing noise levels are already well above the recommended WHO limits in Earith High Street and have been consistently so for many years. In these circumstances it is difficult to understand how any increase in noise can be considered to be "insignificant."
- 4.119 (9 April 2019 and 18 May 2020) The decisions made by Cambridgeshire County Council in 1987 and by the Secretary of State in 1989 with respect to the planning application and appeal by Tarmac for gravel extraction at Bridge Farm Willingham show clearly that a similar increase in HGV numbers in local villages was considered unacceptable at that time due to the existing sub-standard environmental conditions. Since 1987 traffic volumes have almost doubled, the levels of noise and air pollution are significantly greater and the numerous, detrimental health effects have been scientifically proven. It is also difficult to understand how projects of this kind, which produce large amounts of greenhouse gases, are in any way compatible with the governments transport de-carbonisation objectives as laid out in the document "Setting the Challenge" recently published by the Department for Transport.

St Ives Area Joint Road Safety Committee

- 4.120 Object to the application on the grounds that it is detrimental to road safety along the A1123 and adjoining roads. At a meeting of the Cambridgeshire Highways and Infrastructure Committee on July 10th 2018 a new strategy for road safety was discussed. Deaths and

serious injuries from traffic accidents have been increasing in the county over the last five years. This is out of step with the national picture where casualty numbers have generally remained static over the same period. This increase has meant that one of the key Public Health Indicators in Cambridgeshire for the number of people killed or seriously injured per 100,000 residents is now flagged as red and specifically for East Cambs, Huntingdonshire and South Cambs districts. The committee also learned that 90% of personal injury collisions (PICs) occur on non-trunk roads in East Cambs, Cambridge and Fenland. The figure is 75% for Huntingdonshire and South Cambs.

- 4.121 The A1123 is a single carriageway non-trunk road which is the responsibility of the county council. According to the Transport Statement accompanying the application there will be a daily average of 90 additional HGV movements along the A1123 between Willow Hall Farm and St. Ives for a period of 7 to 8 [now 5 to 6] years. The statement asserts that the road is in good condition (clause 2.2.3) and that there are no significant accident issues within the study area (clause 2.3.3). The Road Safety Committee would strongly disagree with both these assertions.
- 4.122 It is not clear why the study area has been restricted in the Transport Statement to the length of the A1123 between Haddenham and Earith since the lorries will obviously be travelling further. But it is clear to anyone who drives along this stretch of road that its condition is very poor indeed. Like many fen roads it lacks proper foundations and is prone to shrinkage which distorts the road surface. The general problem with HGVs in the area is acknowledged in the East Cambs Transport Strategy – Part 2 (page 42) which says “Particular issues arise when these large vehicles attempt to negotiate small roads through villages, which were not built or designed to withstand road freight, in order to have a shorter journey. This is a problem in several villages in East Cambridgeshire; most notably, the villages along and linking to A1123, such as Sutton, Wilburton and Haddenham.” It is also a problem for similar villages outside East Cambs such as Earith and Willingham.
- 4.123 The Transport Statement quotes accident statistics for the study area from Cambridge County Council (CCC) for the period 2012 to January 2017. Clause 2.3.2 states that there were 24 PICs in that period but only 2 HGVs were involved. Based on this evidence alone the Transport Statement concluded that there was no road safety problem. This is far from the truth. The combination of a 60mph speed limit and a seriously compromised road surface has led to a spate of serious accidents in this location. If quarrying proceeds, fully laden HGVs will be pulling out on to a fast road with many sharp bends and which, in many places, stands high above the level of the fens.
- 4.124 Slightly more recent statistics from CCC (2012 to March 2018) show that there were 27 PICs in the study area and that 4 of these were classed as fatal and 7 as serious. In contrast, the remainder of the A1123 route from St. Ives to the A10 saw 96 PICs of which 2 were fatal and 20 serious. This means 41% of the accidents resulted in death or serious injury within the study area as opposed to 21% on the rest of the route.
- 4.125 In the opinion of the Road Safety Committee the addition of 90 HGV movements a day on this route is highly undesirable as it will contribute further to the degradation of the road surface and the likelihood of more serious and fatal accidents. The Transport Statement referred to a recent 5-day traffic survey which counted an average 306 HGVs using this route per day. If the application is successful, daily HGV movements will increase by almost 30%.

- 4.126 “Under Section 39 of the Road Traffic Act 1988 the Council has a statutory duty to “prepare and carry out a programme of measures designed to promote road safety... must carry out studies into accidents arising out of the use of vehicles on roads or parts of roads, other than trunk roads, within their area [and] in the light of those studies, **take such measures as appear to the authority to be appropriate to prevent such accidents**” (original emphasis).
- 4.127 The application should be rejected on the grounds that the additional HGV traffic on the proposed route is likely to result in an increase in serious and fatal accidents which will increase the burden on the health services and make the Priority Outcome (1.10) of reducing KSI casualties even harder to achieve.
- 4.128 But a further reason for rejection is the total inadequacy of the Transport Statement provided. The failings of the Statement include;
1. The Study Area is too restricted. HGV traffic is not going to stop in Earith but no data is provided about impacts in places such as St. Ives where daily congestion is a serious problem.
 2. The accident data is narrow and incomplete.
 3. There are factual errors. For example the speed limit through Bluntisham is 30mph not 40mph as stated.
 4. There are several unsupported assertions. For example, that the road is in good condition along Hill Row. This is manifestly not the case.
 5. There is no reference to wider road safety issues in Cambridgeshire such as the increase in road accident casualties and the dangers of non-trunk roads.
- 4.129 Clause 111 [now 113] of the revised National Planning Policy Framework says that applications should be supported by a Transport Statement “..so that the likely impact of the proposals can be assessed”. Such an assessment is not possible due to the shortcomings of the Transport Statement provided. Should this application succeed it will mean at least 150,000 extra HGV movements on the county’s non-trunk road network over a 7 to 8 [now 5 to 6] year period. Such an increase demands a proper assessment of the transport and road safety implications.

Hilton Action on Traffic

- 4.130 Object to the application for the following reasons. The volumes of HCVs traveling through the village has been steadily increasing and is now totally unacceptable for a B road through a small village. The proposed construction of a reservoir at Willow Hall Farm will almost certainly add significantly to this problem as the extraction location will have onsite processing facilities meaning that vehicles are likely to go directly to their client’s sites. As we already experience, a large percentage of HGVs heading south along the B1040 through Hilton are aggregate HCVs, as this will also be the most direct route from Haddenham to all locations south of St Ives (the shortest route vehicles from Willow Hall Farm can travel).
- 4.131 There is currently a Traffic Regulation Order (TRO) in place prohibiting vehicles over 7.5 tonnes between the hours of 11PM and 7AM from traveling along the B1040. This restriction is regularly infringed and as the application indicates the site will operate from 6.00AM, this has the danger of increasing this problem.

- 4.132 Recent measurement of NO₂ levels along the B1040 within the village boundary found high levels at all locations, and at times in excess of the legal limit of 40ug/m³. This can only get worse with an increase of highly polluting diesel HCVs.
- 4.133 The evidence for damage caused to health by excessive noise and air pollution is now overwhelming and was summarised in the 2017 Annual Report from the UK Chief Medical Officer (CMO) which was entitled 'Health Impacts of all Pollution – what do we know?' The report implicated air pollution in a range of non-communicable diseases such as cardiovascular disease, cancer, asthma, and chronic obstructive pulmonary disease. One recommendation stated that in order to prevent ill-health, local authorities need to broaden their current environmental strategies to include all forms of pollution and consider risks arising from both consistent low-level exposure and intermittent high-level exposure.
- 4.134 Cambridgeshire County Council have already recognised the importance of this issue. In a document entitled 'Proposed Approach to Air Quality and Health across Cambridgeshire' dated November 16th, 2017, the Health Committee noted that; "Air quality can be a material consideration in planning decisions, normally relating to pollution from additional traffic but also point sources."
- 4.135 There many houses in Hilton that are located immediately adjacent to the B1040 and not only are they affected by the air pollution indicated above, but also be the noise and vibration generated by HGVs thundering by.
- 4.136 The European Heart Journal has published a study linking road noise with increases in hypertension which is considered to be the highest health risk factor of all. Road noise also causes stress, sleep disturbance and other health problems. This is consistent with earlier studies by the World Health Organisation and studies of the health costs of noise pollution carried out and published by DEFRA in 2014.

National Farmers' Union Ely & Soham Branch

- 4.137 Supports the application to construct on-farm winter [water] storage facilities. On leaving the EU, government seeks to promote increased domestic food production and ensure that consumers can be confident about where their food comes from.
- 4.138 A reservoir is now an essential part of the farmer's toolkit for securing water. Water is an essential input for the crops grown on fenland farms, not only for plant viability but to achieve best quality of vegetables as demanded by consumers. Many local catchments in the fens now have water available for abstraction only during times of high flow. Recent droughts and the longer term threat of climate change (hotter drier summers, reduced water availability, increasing demand) only heightens concerns about the reliability of future supplies for irrigated agriculture.
- 4.139 Construction of a farm reservoir here is a sustainable solution to a potential problem because it seeks to utilise abundant winter rainfall and store it for use in summer when flows might be low.
- 4.140 Latest national guidance published in 2017 [following the DCLG rural planning review] recognises the importance of on-farm reservoirs to allow sustainable water management for

farmers and growers, and addresses some of the planning issues that previously complicated and delayed the planning process for reservoirs.

- 4.141 intention to export sand and gravel from the site to part-fund the considerable cost involved in constructing on-farm water storage. Existing guidance sets out the Government's position that local authorities should give due consideration to why a farmer or grower is applying for permission for an on-farm reservoir. It states that local authorities should have regard to the increasing need for sustainability. This is further defined as through the careful management of water, the benefits of water storage can bring to a sustainable farm business and the contribution that water management through on-farm reservoirs can also make to flood alleviation. Effectively it is encouraging on-farm reservoirs to be seen as part of the wider management of water.
- 4.142 Guidance confirms that, while planning authorities should encourage excavated material to remain on site if possible, farmers and growers are able to make a case where this cannot be achieved. Since in this case the extraction of materials is clearly a by-product of an on-farm reservoir application, and the reservoir is needed to improve a farm business's sustainability and to protect water resources, then it is hoped that this planning application will be considered favourably.

Campaign to Protect Rural England

- 4.143 Objects to the application for the following reasons:

Landscape - The proposed irrigation reservoirs will be a prominent and intrusive feature on this rural landscape.

RAMSAR site - It is understood that the Environment Agency is proposing to create a second Ramsar site on Haddenham Fen, south of Sutton. The effect of the quarrying proposal on that site, and all other wildlife sites in the area, should be very carefully considered.

Loss of agricultural land - The application would result in the loss of 32.9ha of farmland (including 18 ha of the best and most versatile land).

Irrigation - Concerned that additional watering of this agricultural land will damage the underlying peat and therefore in the long term there will be no increase in crop production to justify the upheaval of creating the reservoirs.

Gravel extraction - The dominant feature of the application is the gravel extraction and its associated infrastructure for a period of seven or eight years [now 5 or 6] is too high a price to pay for irrigation reservoirs of questionable value.

Highways - The quarrying operation will throw an extra 105 lorries per day on to the A1123 and thence on to the A1123 to St Ives, B1050 to Willingham, B1381 to Sutton or B1050 to Somersham. These roads are already in a fragile condition and in need of constant maintenance. Should the application be approved, we hope that there will be a condition whereby the applicant pays the appropriate cost for the additional road maintenance.

Minerals - The site is not allocated in the County Minerals & Waste Plan. CPRE is strongly of the view that any changes to the Plan should only be considered when the Plan is being reviewed. This would be consistent with the NPPF 2018.

Effect of traffic on Earith - While it is noted that the intention is to remove aggregates from the quarry through Earith and thus avoid the villages to the east (e.g. Haddenham and Wilburton), an intolerable burden would be placed on Earith and there is no evidence that this intention would be complied with and other villages such as Haddenham, Willingham and Sutton would not also be affected.

Individual representations

4.144 Have been received from 77 individuals, all but one of whom object to the application. A copy of these has been provided to members of the Planning Committee. Their reasons are summarised below in order of frequency of being raised:

- Structural damage to housing from vibrations of construction traffic
- Additional congestion caused by construction traffic
- Increased noise levels from construction traffic
- Increased air pollution from construction traffic
- Damage to road foundations from weight/movement of construction traffic
- Road safety - construction traffic travelling through villages (exceeding speed limit)
- Road safety - construction traffic travelling through villages (non-specified)
- Road safety- construction traffic travelling through villages (narrow width of road)
- Direct health impact from increased pollution
- Lack of conformity with the local minerals and waste plan
- Loss of agricultural land
- Road safety - construction traffic travelling through villages (failing to stop for pedestrian crossings)
- Adverse effects on local ecology
- Concerns about alternative routes if e.g. flooding in Earith/accident on roads
- Significant cost of repairing damaged roads
- Construction traffic is unlikely to be monitored
- Excessive size/scale of the proposed reservoir
- Not in keeping with character/conservation area
- Damage to housing foundations from construction traffic distributing water collected in potholes
- Potential adverse effect on local property prices [not a material consideration]
- Lighting of the site causing visual pollution
- Site will have negative impact on demand and delay beneficial restoration other mineral sites
- Lack of information/detail given on application
- Effects caused by reverse seepage out of reservoir
- Visual impact of site
- Effect on groundwater levels having detrimental effect for neighbouring farmers
- Essential for farmers to secure water – droughts
- Plant and vegetable viability – irrigation
- Improves business

- 4.145 In addition, a petition signed by 170 individuals was received on 30 September 2019 the text of which is as follows: “We the undersigned, petition Cambridgeshire County Council to recognise our deep concern as residents, regarding the application to utilise local agricultural land to extract gravel and to transport it wherever required for a period of 7 – 8 years [now 5 - 6]. From the applicants’ own Transport Statement this would mean that an extra 150,000 HGV movements [less since capacity of reservoir reduced] would be added to the already overcrowded network of roads encompassing, Wilburton, Haddenham, Sutton, Earith, St Ives & Willingham. Our homes are and the roads are being damaged now, due to the vibration caused by the size and weight of HGV’s currently going through, without this large increase.
- 4.146 Hillrow Causeway is a dangerous road with an uneven ever moving surface with deep ditches either side, not dissimilar in makeup to the soil under the Ely Bypass. To site a quarry here on the main east west route from the A10 to Huntingdon and the A1 would be totally irresponsible and unacceptable to the surrounding communities.”

A G Wright & Sons Farms Limited (AGW)

[AGW own land immediately to the south of the A1123 opposite the proposed reservoirs site. They have commissioned specialist technical advice from TerraConsult about the potential impact on groundwater and on their farming business.]

- 4.147 (25 February 2021) TerraConsult do not believe that the applicant has provided an adequate response to elements of the MPA’s request for additional information dated 8 October 2020: a description of the reasonable alternatives studied by the developer; and in the context of Policy CS42 the option of part above ground storage which would require the excavation of less mineral.
- 4.148 The applicant’s efforts to install water level monitoring points on the AGW land during October 2020 is appreciated. However, to make full use of these monitoring points additional information not originally presented, albeit alluded to, within the updated application was required and subsequently provided. (21 June 2021) This allows AGW to monitor BH14 and BH15 directly in parallel to the applicant. A lower limit hasn’t been set for those as yet, whilst the continued drop in water level from the 10th February is demonstrative of the core issue for AGW, that the first quarter of the year free from dewatering is necessary to allow a natural recovery pattern to recharge the water system.
- 4.149 (25 February 2021) Paragraphs A2.25 – A2.27 of the Proposed Groundwater Level Monitoring Strategy discuss the “Mitigation to maintain groundwater levels during critical period for surface water abstractors April to September”. The statements are clear that active Groundwater Management (i.e. dewatering) will only take place during the October – December period. However, they are more ambiguous regarding a suitable recovered groundwater level which must be adhered to and the consequences of such. Paragraph A2.25 essentially states that:
- 1) groundwater levels must return to the level set in the April of the previous dewatering year; and
 - 2) groundwater levels on the 5th April each year cannot in any year after dewatering be below: • +0.12mAOD at BH09 • +0.04mAOD at BH02a • -0.11mAOD at BH12; and • -0.12mAOD at BH01.

- 4.150 The logical conclusion is that there will be insufficient water available if these groundwater elevations cannot be met and therefore an immediate requirement for a compensation payment due to crop loss and for the mechanism of this compensation to be written into the planning permission. Paragraph 3.11.8 [of the revised HIA], however, extends the dewatering period to the end of February. This is unacceptable and an extension of dewatering to the end of February is not agreed. The entire purpose of this dewatering is intended to locally empty the aquifer during the primary recharge period (i.e. January and February). Consequently, the benefit to annual seasonal aquifer recharge will be lost. The assurances given that the aquifer can be locally recharged with waters from Reservoirs A and B are inadequate and fail to demonstrate how and where this could occur. Nor does the assessment demonstrate that this could in practice recharge the aquifer outside of the immediate sphere of the recharge point including the AGW lands to the south and east of the dewatering zone, which as upgradient locations and are recharged from the wider hydrogeological system.
- 4.151 A second concern is the extended dewatering period is that it is to occur during what is likely to be the highest demand on the IDB to ensure that agricultural land does not become waterlogged. It is unclear on why an extension to the dewatering period into the January – February period is necessary to construct the two smaller lagoons, when the larger lagoon, Reservoir A can be engineered with a 3-month autumn dewatering period. Given the concerns regarding water availability, specific conditions are requested to be included within the planning permission.
- 4.152 The Figure 5 data from the HIA2 [revised HIA] demonstrates that the BH12 water elevation is identical to that of BH14 (at +0.28mAOD on 4th January 2021), whilst that of BH15 is +0.06m above that of BH01. Consequently, there is a mechanism to provide an independent and appropriate verification that aquifer management objectives are achieved. Therefore, at this stage and based on the applicant's monitoring data provided a condition in the planning permission, in addition to any required by the Environment Agency is sought, that states:
- 1) No dewatering outside of the October to December period; and
 - 2) By the first of April in any year following a period of dewatering, groundwater levels must recover to:
 - a) -0.06mAOD at BH15; and
 - b) -0.11mAOD at BH14.
- This recovered water elevation can then be monitored by both the applicant and AGW. If groundwater levels have not recovered by the 1st April a crop loss payment will become due to AGW.
- 4.153 It is proposed that as water level data is such a critical factor, that data is shared between parties by email following each monitoring event as a condition of the permission. Ideally this should be in the form of a spreadsheet as presented in Document 28A Borehole Monitoring Logs September 2018-December 2020 and include all monitoring points on AGW land, as well as the wider sphere of monitoring points identified by the Environment Agency and the IDB. This should be updated on a weekly basis and circulated immediately to relevant parties, including AGW and the IDB throughout February and March each year, and monthly for the remainder of each year.
- 4.154 Although there is always a potential risk due to future weather pattern changes, a natural water level is expected to be returned by April if the dewatering programme does follow a

programme of dewatering only during the October to December period, thus allowing recovery during January, February and March of the year following any dewatering period. Consequently, it should be readily possible to monitor the recovering groundwater system in a timely fashion during the first quarter of each year to enable a decision to be made on a “crop loss payment” immediately at the start of April each year. A separate legal agreement [between the neighbouring landowners] as identified by Environment Agency (17 February 2021) [see paragraph 4.34 above] is required which sets out the conditions of this scheme as a condition of the permission. It is appreciated that a separate Groundwater Abstraction Permit is required from the Environment Agency and would ask that any conditions set are made with the full agreement of the IDB.

4.155 The updated application documentation states that there is an intention to extend active groundwater management after December into January and February. This is unacceptable. It is considered necessary to ensure that there is confidence in a monitoring /compensation schedule within the planning permission and that there is a condition that groundwater dewatering is only to take place during the October to December period. Conditions are requested that require groundwater monitoring to continue to take place during the irrigation season along with inspection of the lagoons to ensure that the lagoon liner is not ruptured by groundwater pressure acting on the sidewall. Such a rupture if significant could allow groundwater ingress and therefore additional water loss from the natural system, a particular concern during dry periods. In the first instance this can be addressed by third party Construction Quality Assurance (CQA) supervision during liner construction with associated reporting. Liner inspection is by definition a summer / autumn activity as water levels will need to be lowered in the lagoons to allow inspection. Such a programme can be readily incorporated into the planning permission and can be carried out by a suitably qualified engineer whilst continued groundwater monitoring in the longer term would enable a cross-check of the significance (if any) of liner leakage/ruptures, which could artificially reduce groundwater availability in the surrounding lands.

4.156 Until the January, February and March dewatering is removed from the proposal the objection to the application is maintained and the gravel extraction should not go ahead.

Cllr Steve Criswell (member for Somersham & Earith Division)

4.157 I am not the local councillor for the site of the proposed development but represent the people who will be most affected by it. I have received the Transport officer's response to the points I've previously raised, but do not accept that a Routing Agreement could not be conditioned in order to direct the associated HCV traffic onto the primary network by the shortest route possible via the A1421. The A142 is a far superior road to the A1123 directly serving the A141 or A10 which in turn connect with the A1 and A14, covering all directions. In the absence of such a Routing Agreement, I would like to register my objection to the above application and make the following points;

- East Cambs Transport Strategy 2016 gives particular mention to HCV problems on the A1123 and surrounding villages, with a stated intention to remove HCV traffic from the 'central diamond'. The aim is that HCVs will use A141/142, A10 or A14. Andy Preston's team are tasked with delivering this. The opening of the Ely Southern bypass reinforces that intention.
- The Advisory Road Freight Map was altered specifically to move 'through HCV traffic' from the A1123. This was also intended to ensure that local HCVs would access the primary routes by the shortest means possible. If not, they just become 'through traffic'.
- The

shortest route from Willow Hall Farm is via the A1421 onto the A142. This involves one village only. If that is not acceptable, then nor is Earith, Bluntisham and part of St Ives.

- Earith High Street is extremely problematic. It is far narrower than is now acceptable for an A class road. HCVs regularly mount the kerb when passing each other. The footpath is also very narrow in places, putting pedestrians dangerously close to passing vehicles. It is not uncommon for lorry door mirrors to be found on the footpath. Very old properties with little foundation are situated close to the road and are structurally suffering.
- The applicant acknowledges that St Ives is not the final destination of minerals, purely his preferred route onto the primary road network. His preference should not be at the expense of any more residents than absolutely necessary.
- The B1096 and associated junctions at St Ives is currently one of the most congested areas in the county. With additional growth in the area imminent, this will get worse. Work is underway, but a solution has yet to be identified. When it is, it is unlikely to be delivered in time to serve this development.
- I accept that new applications should not be expected to address existing problems, however there comes a point when the additional impact of a proposed development renders the situation severe and unacceptable. Earith High Street and the residents who live there cannot be expected to accept unlimited HCV traffic “because a problem already exists”.

5. Planning history

- 5.1 There is no relevant planning history for the proposed development site.

6. Planning policy and guidance

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan comprises:
- Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy Development Plan Document (adopted July 2011) (the MWCS); and
 - East Cambridgeshire Local Plan (adopted April 2015) (the ECLP).
- 6.2 Other relevant planning policy documents are:
- Cambridgeshire Flood & Water Supplementary Planning Document (adopted 14 July 2016) (the FWSPD)
 - East Cambridgeshire District Council Natural Environment – Supplementary Planning Document (SPD) (adopted 24 September 2020) (the NESPD)
- 6.3 Cambridgeshire County Council and Peterborough City Council are undertaking a review of the Minerals and Waste Development Plan. This new Plan will be known as the Cambridgeshire and Peterborough Minerals and Waste Local Plan (MWLP). The examination in public hearing sessions took place between 15 and 17 September 2020, the Inspector’s final report has been received and the plan has been found ‘sound’, subject to his final Main Modifications so the emerging MWLP carries some weight until it is adopted and entirely replaces the MWCS.

6.4 The following policies contained in the MWCS are considered relevant to this proposal:

- CS1 Strategic Vision and Objectives for Sustainable Minerals Development
- CS4 The Scale and Location of Future Sand and Gravel Extraction
- CS13 Additional Mineral Extraction
- CS22 Climate Change
- CS24 Design of Sustainable Mineral and Waste Management Facilities
- CS25 Restoration and Aftercare of Mineral and Waste Management Sites
- CS26 Mineral Safeguarding Areas
- CS32 Traffic and Highways
- CS33 Protection of Landscape Character
- CS34 Protecting Surrounding Areas
- CS35 Biodiversity and Geodiversity
- CS36 Archaeology and the Historic Environment
- CS38 Sustainable Use of Soils
- CS39 Water Resources and Water Pollution Prevention
- CS42 Agricultural Reservoirs, Potable Water Reservoirs and Incidental Mineral Extraction

6.5 The following ECLP policies are considered relevant to this proposal:

- ENV1 Landscape and settlement character
- ENV2 Design
- ENV7 Biodiversity and geology
- ENV8 Flood risk
- ENV9 Pollution
- ENV14 Sites of archaeological interest
- COM7 Transport impact

6.6 The following MWLP policies are considered relevant to this proposal:

- Policy 1 Sustainable Development and Climate Change
- Policy 2 Providing for Mineral Extraction
- Policy 5 Mineral Safeguarding Areas
- Policy 9 Reservoirs and Other Incidental Mineral Extraction
- Policy 17 Design
- Policy 18 Amenity Considerations
- Policy 19 Restoration and Aftercare
- Policy 20 Biodiversity and Geodiversity
- Policy 21 The Historic Environment
- Policy 22 Water Resources
- Policy 23 Traffic, Highways and Rights of Way
- Policy 24 Sustainable Use of Soils

6.7 The National Planning Policy Framework (July 2021), and Planning Practice Guidance (PPG) are also material planning considerations.

7. Planning considerations

7.1 The NPPF sets out the Government's planning policies and how it expects them to be applied. Paragraph 7 states that "The purpose of the planning system is to contribute to the

achievement of sustainable development”. Paragraph 8 sets out three overarching objectives: economic, social and environmental. One part of the environmental objective is “mitigating and adapting to climate change”. Paragraph 11 gives a presumption in favour of sustainable development and states that “For decision-taking this means

“c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

- 7.2 Section 17 of the NPPF (Facilitating the sustainable use of minerals) states at paragraph 209 the Government’s view that “It is essential that there is a sufficient supply on minerals to provide the infrastructure, buildings, energy and goods that the county needs. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation.” Paragraph 211 states “When determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy” and that mineral planning authorities should:

“b) ensure that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality;

c) ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive receptors;

e) provide for restoration and aftercare at the earliest opportunity, to be carried out to high environmental standards, through the application of appropriate conditions. Bonds or other financial guarantees to underpin planning conditions should only be sought in exceptional circumstances.”

- 7.3 Paragraph 213 of the NPPF states that mineral planning authorities should plan for a steady and adequate supply of aggregates by, amongst other things, “maintaining landbanks of at least 7 years for sand and gravel” and “ensuring that large landbanks bound up in very few sites do not stifle competition.”

Principle of the development

- 7.4 Climate change predictions are that the UK can expect a significant reduction in summer rainfall and higher summer temperatures which would increase evaporation rates. This will have a direct impact upon the potential soil moisture deficit and accordingly, there will be a similar increase in demand for irrigating agricultural crops. The greatest increase will be in areas such as Cambridgeshire where the land is suitable for arable farming but which has relatively low levels of rainfall. Restrictions on summer water abstraction licences are in

place. In March 2020 the Environment Agency published the following document: “Meeting our future water needs: a national framework for water resources” which sets out a strategic direction for the work being carried out by regional water resources groups and how the likely pressures on demand for water will be met. It identifies the east of England as facing significant pressure, having little surplus water available and a high level of demand from agriculture in particular. The Environment Agency is supportive of the development from a water resources resilience point of view (see paragraph 4.25 above).

- 7.5 As noted in paragraph 7.1 the NPPF supports measures to mitigate and adapt to climate change. MWCS policy CS22 states that “In the case of mineral workings, restoration schemes which will contribute to addressing climate change adaptation will be encouraged e.g. through flood water storage, and biodiversity proposals which create habitats which act as wildlife corridors and living carbon sinks.” MWLP Policy 19 has an almost identical provision and MWLP Policy 1 also supports proposals that would ensure the future resilience of communities and infrastructure to climate change impacts. ECLP policy EMP2 supports the expansion of existing businesses in the countryside where a full justification is made. Section 6 of the NPPF (Building a strong, competitive economy) states at paragraph 84 that planning policies and decisions should enable “the development and diversification of agricultural and other land-based rural businesses”.
- 7.6 It is considered that the principle of harvesting water during the winter when it is in plentiful supply and storing it for use in dry periods of the growing season would potentially provide winter flood storage and reduce the need to abstract water in the summer would meet the policy aims set out in the previous paragraphs.
- 7.7 The benefits to the applicant company’s farm business are set out in broad terms in paragraph 2.1 above. The MPA appointed Peter Danks of Reading Agricultural Consultants (RAC) to provide independent advice on the agricultural need and justification for the proposal. Although critical of the extent of the applicant’s capital cost exercise and his apparent failure to consider a balanced excavation and part above-ground storage, which would involve the extraction of less mineral, Mr Danks has concluded that there is a reasonable need for the volumes of water proposed to be abstracted and stored at Willow Hall Farm given the operational command area identified in the proposal.
- 7.8 MWCS policy CS42 deals with agricultural reservoirs, potable water reservoirs and incidental mineral extraction and states that:
- “Proposals for new or extensions to existing agricultural reservoirs, potable water reservoirs, or development involving the incidental extraction and off site removal of mineral, will only be permitted where it can be demonstrated:
- a. there is a proven need for the proposal
 - b. that any mineral extracted will be used in a sustainable manner
 - c. where the proposal relates to a reservoir, the design minimises its surface area by maximising its depth
 - d. the minimum amount of mineral is to be extracted consistent with the purpose of the development
 - e. the phasing and duration of development proposed adequately reflects the importance of the early delivery of water resources or other approved development

The determination of planning applications will have regard to the objectives of the mineral and waste spatial strategies in this Plan”

7.9 MWLP Policy 9 states that:

“Proposals for new or extensions to existing reservoirs, or other development involving the incidental extraction and off site removal of mineral (such as lakes, marinas, agricultural or potable water reservoirs, or commercial fish farming or fishing ponds), will be supported where it can be demonstrated that:

- a. there is a proven need* and demonstrable sustainability benefits† for the proposal, or the proposal is identified in a water company’s water resource management plan;
- b. any mineral extracted will be used in a sustainable manner;
- c. where the proposal relates to a reservoir, it has considered wider implications than just the operational needs of the future reservoir, such as whether viable mineral might be sterilised, the loss of productive land, and any dewatering implications during the construction phase. To address some of these implications it may be necessary to minimise the surface area by maximising the depth;
- d. the minimum amount of mineral to be extracted is consistent with the purpose of the development; and
- e. the phasing and duration of development adequately reflects the importance of the early delivery of water resources or other approved development.

*‘proven need’ would have to demonstrate that the proposal was in the public interest to proceed. †‘sustainability benefits’ could include, but not necessarily be limited to: water storage in order to reduce currently unsustainable groundwater extraction; significant biodiversity net gains or measures to help preserve or enhance designated biodiversity sites; and flood risk management benefits”.

7.10 The five criteria (a) to (e) in MWCS policy CS42 and MWLP Policy 9 will be addressed in turn in the following paragraphs.

7.11 a. there is a proven need for the proposal and demonstrable sustainability benefits

The application was accompanied by a report on the need for irrigation water which was revised in August 2019 in response to initial comments by RAC. The command area was amended in December 2019 and January 2020 as set out in paragraphs 2.3 and 2.4. Given the advice from RAC it is considered that the need for the proposed reservoirs had been sufficiently demonstrated. The proposal would meet the “sustainability benefit” test in MWLP Policy 9 in that it would store water that would be used in place of groundwater abstracted in the growing season and potentially provide floodwater storage capacity in winter.

7.12 b. that any mineral extracted will be used in a sustainable manner

In the case of sand and gravel, paragraph 11.77 of the MWCS and paragraph 4.10 of the MWLP indicate that processing the mineral on site or exporting it to a nearby processing plant would meet this criterion. It is proposed that the sand and gravel would be processed on the development site so the proposal would comply with criterion (b).

- 7.13 c. where the proposal relates to a reservoir, the design minimises its surface area by maximising its depth and wider implications have been considered

The proposed volume of water has been justified (see paragraph 7.7 above) and it is proposed that the full depth of sand and gravel would be extracted to the underlying clay. As set out in paragraph 2.2 above, the scheme was amended so that the surface area of the reservoirs is 8.3 hectares less than originally proposed. It is considered that this would comply with criterion MWCS policy CS42 (c).

The full depth of the underlying sand and gravel would be removed so none would be sterilised. The development would result in the loss of approximately 15.5 hectares of mostly grade 3 agricultural land (the reservoirs and the conservation grassland area). It is considered that this would be outweighed by the benefits of increasing productivity on 616 hectares (over the whole rotation cycle) of mostly grade 2 and grade 1 land. The implications of dewatering during the construction phase as set out in paragraph 2.7 are discussed later in this report as are the off-site impacts of the HGV traffic.

- 7.14 d. the minimum amount of mineral is to be extracted consistent with the purpose of the development

This is covered by paragraphs 7.7 and 7.13 above.

- 7.15 e. the phasing and duration of development proposed adequately reflects the importance of the early delivery of water resources or other approved development

It is proposed that the first reservoir would be functional within 2 years of commencement and the second by year 4. It is recommended that if planning permission is granted it should be subject to a condition that no work shall commence in the third reservoir until the first reservoir is complete and capable of supplying irrigation water. The proposed development should be completed within 5 years. This is considered reasonable given the quantity of sand and gravel to be extracted, the restriction on the number of HGV movements and the method of working described in paragraph 2.7.

- 7.16 It is considered that in principle the proposed development would comply with MWCS policy CS42 and with the comparable criteria in MWLP Policy 9 so should be supported provided that there are no overriding material planning considerations which indicate otherwise. There is very little, if any, objection to the principle of a winter storage reservoir but there is concern from individuals and local community organisations about some of the effects of the development particular to its location. These are the possible impact of dewatering on groundwater in adjacent land and the impact of the HGV traffic on the communities of Earith and Bluntisham. These matters will be considered within later sections of this report.

Sand and gravel landbank and impact on other mineral sites

- 7.17 The proposed development would allow 691,000 tonnes of sand and gravel to enter the market at a rate of up to 200,000 tonnes per year from a “windfall site” that has not been allocated in the MWCS or MWLP. The MWLP contains the more up to date analysis of the sand and gravel landbank (41.43 million tonnes (Mt) permitted reserves at the end of 2017 within Cambridgeshire and Peterborough) and the amount that should be provided from within the Plan area (2.6 million tonnes per annum (Mtpa)). The MWLP makes allocations

for a total of 17.623 Mt of sand and gravel, 27% of which is at site M035: Block Fen/Langwood Fen East and is being carried forward from the MWCS as land which must be restored to complementary Ouse Washes habitat (wet grassland).

- 7.18 The RSPB considers that the proposed development would adversely impact on the creation of habitat on which the Block Fen / Langwood Fen Master Plan (July 2011) is based so would not be in accordance with minerals policy. In the 10 years since the MWCS and Master Plan were adopted only two applications for new mineral development within the Master Plan area have come forward. The first (ref. no. F/2001/16/CM) was for 1.9 Mt of sand and gravel and was refused in 2017 principally because only 5 hectares of the 62 hectare site would be restored in accordance with the Master Plan to complementary Ouse Washes habitat. The second (ref. no. F/2014/18/CM) is for 430,000 tonnes of sand and gravel and 180,000 cubic metres of clay. The whole 17 hectare site would be restored to wet grassland and would contribute to the approximately 100 hectares that it would be viable for the RSPB to manage. Permission was granted in December 2020 and the applicant is currently discharging pre-commencement conditions. It appears to be landowner reluctance to commit to restoring their sites to wet grassland that is a major factor delaying the implementation of the Master Plan and it is not considered that the proposed reservoir development would significantly prejudice this. It is noted that no objections to the proposal have been raised by mineral operators with whom the proposed development would be competing for a share of the market.

Groundwater and water quality

- 7.19 MWCS policy CS39 states that:

“Mineral and waste management development will only be permitted where it is demonstrated that there would be no significant adverse impact or risk to:

- a. the quantity or quality of surface or ground water resources; and
- b. the quantity or quality of water abstraction currently enjoyed by abstractors unless acceptable alternative provision is made; and
- c. the flow of groundwater at or in the vicinity of the site.

All proposed mineral and waste management development will be required to incorporate adequate pollution control and monitoring measures.”

- 7.20 MWLP Policy 22 states that:

“Mineral and waste management development will only be permitted where it can be demonstrated (potentially through a detailed hydrogeological assessment) that there would be no significant adverse impact on:

- a. the quantity and quality of surface or groundwater resources;
- b. the quantity and quality of water abstraction currently enjoyed by abstractors unless acceptable alternative provision is made;
- c. the flow of groundwater at or in the vicinity of the site; and
- d. increased flood risk, both on-site and off-site.

All proposed development will be required to incorporate adequate pollution control and monitoring measures.

Proposals should also have due regard to the latest policies in the Cambridgeshire Flood and Water SPD and the Peterborough Flood and Water Management SPD (or their successors).”

- 7.21 ECLP Policy ENV9 seeks to protect surface and groundwater quality as does the NPPF at paragraph 174 (e).
- 7.22 The proposed method of working evolved in response to concerns that dewatering the site to extract the sand and gravel and construct the reservoirs would adversely affect the groundwater in nearby land outside the applicant’s ownership. The current proposal is that dewatering would only take place in the winter. The Environment Agency’s position is set out in detail in paragraphs 4.26 to 4.34 above. In summary they consider that the proposed development, although not entirely without risk, is capable of being carried out in such a way that adverse impacts are mitigated to acceptable levels.
- 7.23 One key factor is the integrity of the reservoirs’ impermeable clay liners and a condition has been recommended by the Environment Agency which would require the developer to commission a report or CQA validation by a competent engineer before each reservoir is filled with water. Lining mineral voids with the clay which underlies the sand and gravel to create an impermeable liner is a well-established method of containing either landfilled waste or water. With appropriate design and supervision there is no reason to believe that this couldn’t be achieved in this instance.
- 7.24 A neighbouring landowner, A G Wright and Sons Farms Ltd (AGW) (see paragraphs 4.147 to 4.156 above), is greatly concerned about the potential impact on groundwater and consequently on their farming business. The Environment Agency has explained the proposed winter dewatering will be subject to an abstraction licence and that during the licensing process they will need to be satisfied that the activity of dewatering will not adversely affect the water environment or derogate licences held by nearby water users. Having reviewed the applicant’s Revised Hydrogeological Risk Assessment (Document 31A April 2021) the Environment Agency concludes that on the balance of the information provided the proposed mitigation in section 3.11 of the Revised HRI and temporary nature of the dewatering, is considered satisfactory. They are also content with the applicant’s proposed groundwater level monitoring strategy which can be secured by condition (see recommended condition 7) which would be subject to a reporting requirement (see recommended condition 8).
- 7.25 The proposed dewatering periods are set out in paragraph 2.7 above. AGW are strongly opposed to it continuing beyond December (see paragraphs 4.147 – 4.156 above). The applicant has submitted a revised HIA and groundwater monitoring scheme which the Environment Agency considers to be acceptable and has not requested that dewatering cease after December. It is considered that there are insufficient grounds to require dewatering to cease at the end of December. The proposed groundwater monitoring strategy includes monitoring at 3 boreholes south of Hillrow Causeway, two of which are on AGW’s land.
- 7.26 AGW has asked that some form of redress be incorporated within the planning permission if, despite the mitigation and monitoring, their land is adversely affected by the applicant’s dewatering. It is considered that this would go beyond the remit of the planning system and would be a private matter between the two landowners. Members are reminded that

paragraph 56 of the NPPF states, “Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.” In the circumstances the impact on the area generally can be adequately controlled through the conditions as suggested. Further to the limitations on the use of conditions set out in the NPPF issue of any compensation that may be due between landowners is not relevant to planning and as such cannot be dealt with by condition.

- 7.27 The Environment Agency has drawn attention to the need to protect water quality (see paragraph 4.42 above). The main risk of pollution of surface or groundwater would be from spillages from the plant and machinery used to extract, process and transport the mineral and to construct the reservoirs. This would not be significantly different to many farming activities. Surface water could be polluted by suspended solids from mineral processing. It is estimated that 90% of this water would be recirculated having passed through silt settlement lagoons. The Environment Agency has recommended a condition requiring a water quality monitoring plan to be put in place (see paragraph 4.42 above and recommended condition 10).
- 7.28 Subject to the conditions referred to above being in place it is considered that the proposed development would comply with MWCS policy 39, ECLP Policy ENV 9, MWLP Policy 22 and NPPF paragraph 174 (e) in respect of protecting ground and surface water quantity and quality.

Flood risk

- 7.29 The proposed reservoirs would be within flood zone 3 so the sequential test should be applied. The aim of the sequential test is to steer new development to areas with the lowest probability of flooding. The purpose of the proposed development is to use water from the HLDC district in winter to irrigate land within the district in summer therefore it would need to be located within the district. Only a small part of the HLDC district is outside flood zone 3 and already contains a small above ground reservoir. The Environment Agency considers sand and gravel working and water transmission infrastructure to be water compatible development. The LLFA is satisfied that the proposed development would not increase the risk of flooding so has no objection to the proposed development and recommends that a surface water drainage scheme be secured by planning condition.
- 7.30 The Environment Agency considers that the proposed temporary buildings may present a hazard to during a flood event and recommends that a condition is imposed requiring them to be securely anchored (see recommended condition 34).
- 7.31 For the reasons set out above it is considered that if a surface water drainage scheme is secured by condition and the temporary buildings are secured against a flood event the proposed development would comply with paragraphs 167 and 169 of the NPPF, MWCS policy CS22, ECLP Policy ENV8 and MWLP Policy 22.

Highways and traffic

- 7.32 MWCS policy CS32 of the Core Strategy states that:

“Minerals and waste development will only be permitted where:

- a. it is demonstrated that opportunities for the use of alternative methods of transport have been evaluated and the most appropriate pursued where practicable;
- b. access and the highway network serving the site are suitable or could be made suitable and able to accommodate any increase in traffic and / or the nature of the traffic associated with the development;
- c. any associated increase in traffic or highway improvements would not cause unacceptable harm to the environment, road safety or residential amenity; and
- d. binding agreements covering lorry backloading, routeing arrangements and HCV signage for mineral and waste traffic may be sought. In Cambridgeshire this will be informed by the Cambridgeshire Advisory Freight Map.”

7.33 The relevant parts of ELP Policy COM7 are that “Development proposals shall:

- a. Provide safe and convenient access to the highway network.
- f. Be capable of accommodating the level/type of traffic generated without detriment to the local highway network and the amenity, character or appearance of the locality.
- g. Be accompanied by a Transport Statement where appropriate; or if the proposals are likely to result in significant transport implications, be accompanied by a Transport Assessment. The coverage and detail of this should reflect the scale of development and the extent of the transport implications.
- i. Within (g) and (h) indicate any steps to mitigate impacts relating to noise, pollution, amenity, health, safety and traffic.”

7.34 MWLP Policy 23 states that:

“Mineral and waste management development will only be permitted if:

- a. appropriate opportunities to promote sustainable transport modes can be, or have been, taken up, to the degree reasonably available given the type of development and its location. If, at the point of application, commercially available electric Heavy Commercial Vehicles (HCVs) are reasonably available, then development which would increase HCV movements should provide appropriate electric vehicle charging infrastructure for HCVs;
- b. safe and suitable access to the site can be achieved for all users of the subsequent development;
- c. any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree;
- d. any associated increase in traffic or highway improvements would not cause unacceptable harm to the environment, road safety or residential amenity, and would not cause severe residual cumulative impacts on the road network; and e. binding agreements covering lorry routing arrangements and/or HCV signage for mineral and waste traffic are agreed, if any such agreements are necessary and reasonable to make a development acceptable.

Use of HCV Route Network

Where mineral and/or waste is to be taken on or off a site using the highway network, then all proposals must demonstrate how the latest identified HCV Route Network is, where reasonable and practical to do so, to be utilised. If necessary, arrangements ensuring that the use of the HCV Route Network takes place may need to be secured through an appropriate and enforceable agreement. Any non-allocated mineral and waste

management facility in Cambridgeshire which would require significant use of the highway must be well related to the HCV Route Network.”

7.35 The application proposes that during the mineral extraction phase the development would generate a maximum of 50 and an average of 45 loads per day each with an average capacity of 18 tonnes and a maximum capacity of 24 tonnes. This would amount to 4 or 5 loads (8 – 10 HGV movements) per hour. It is proposed that these vehicles would use the A1123 to the west of the site which goes through Earith, Bluntisham and the outskirts of St Ives on the A1096 before reaching the A1307 (former A14) at Galley Hill. There is a lot of concern in the local community about the impact that these HGVs would have on road safety especially for pedestrians and cyclists; damage to the carriageway and the resulting need for more frequent repair; and the unsuitability of the roads on the proposed route for more HGV traffic. They are also concerned about the vibration, noise and air pollution that the HGVs would cause when travelling on the A1123 through Earith and Bluntisham.

7.36 In response to a request from within the local community the applicant’s transport consultants undertook a review of the alternative routes that would potentially be available (HGV Route Review Document 15) (see Agenda Plan 4):

Route 1 – A1123 to the west through Earith and Bluntisham and the A1096 St Ives bypass to the A1307 (former A14) at Galley Hill (as proposed in the application)

Route 2 – A1123 to the east to Haddenham then A1421 north to the A142 at Witcham Toll, around Chatteris to the A141 joining the A14 at Spittals Interchange

Route 3 – A1123 to the west then B1050 through Willingham and around Longstanton to the A14 at Bar Hill

7.37 They conclude that to gain access to the A14 route 2 is not desirable in highway terms given the accident record, the turn at The Green/Station Road junction which involves HGV crossing the opposite carriageway and the additional travel time and distance to deliver material. They consider that there is little difference in benefit between routes 1 and 3 and that both would be suitable for HGV use.

7.38 The highway authority’s comments are set out in paragraphs 4.77 to 4.81 above. The transport assessment (TA) team have reviewed the applicant’s HGV Route Review and acknowledge the HGV traffic associated with the proposals could route to the west using Routes 1 and 3. The TA Team have previously concluded ‘no objections’ to the proposals. The HGV Route Review document does not change previous comments therefore maintains no objections to the proposal.

7.39 Both MWCS CS32 and MWLP Policy 23 promote the direction of minerals and waste traffic to the Strategic Routes shown on the Cambridgeshire Advisory Freight Map. Route 1 is 10.6 kilometres from the A1096, Route 2 is 8.8 kilometres from the A142 and Route 3 is 15 kilometres from the A14 at Bar Hill. The applicant has assumed that the traffic would travel to and from the A14 in the Huntingdon area and has included in Route 2 use of the A142 and A141 (both Strategic Routes) to reach the A14 at Huntingdon. The applicant has not taken into account the potential route from the A142 Witcham Toll to the A10 at Ely and joining the A14 at Milton.

- 7.40 Notwithstanding the Route Review, the application has not been amended and the proposed HGV route is to the west (Route 1 on Agenda Plan 4) and is what the highway authority has based its comments on. No concerns have been raised about highway capacity. The TA team has concluded that the proposed development would not result in a severe impact on the highway network (see paragraphs 4.80 above). The Highway Development Manager has more recently reviewed the proposed design of the junction of Doles Drove and the A123 and considers that a conventional junction with visibility appropriate for road with a 60 mph speed limit would be preferable (see paragraph 4.81). This has been provided and its provision could be secured by condition (see recommended condition 14).
- 7.41 Haddenham, Willingham, Hilton and Wilburton Parish Councils have raised concerns about HGVs generated by the proposed reservoir development using roads through those villages. The proposed HGV route is Route 1 as set out in paragraph 7.35 above. There would be no HGV traffic from the proposed development on the A1123 through Haddenham village or Wilburton; the B1050 through Willingham; or the B1040 through Hilton unless delivering sand and gravel to a customer in those settlements. The HGV routeing could be secured by planning condition (see recommended condition 19).
- 7.42 The East Cambridgeshire Joint Villages HCV Group has drawn attention to a planning application for mineral extraction at Bridge Farm, Earith Road, Willingham (ref. no. S/01468/87/CM) which would have generated about 90 HGV movements over a 12 hour day, was refused by the MPA and the subsequent appeal dismissed. The appeal decision letter states that “The Secretary of State agrees with the Inspector’s findings and conclusions and accepts his recommendation. Whilst he does not necessarily concur with the Inspector’s view that the A1123 and B1050 are unsuitable routes for HGV he does however consider that in this particular instance the proposed increase in HGV is unacceptable.” The HGV mineral traffic from Bridge Farm would have needed to use approximately 2 kilometres of the B1050 to join the A1123 at Earith Bridge. From the information available it is not clear whether all or part of the proposed HGV route were in 1989 considered unsuitable. In any event, the highway authority considers that this case is too old to now be of relevance.

Environmental impact of HGV traffic

- 7.43 The NPPF at paragraph 104 states that “Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains;”. NPPF paragraph 185 states that “Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;” Residents of Earith and Bluntisham have raised concerns about the impact of vibration, noise and vehicle emissions particularly on properties close to the A1123 and their occupants. Detailed representations have been made by the East Cambridgeshire Joint Villages HCV Group (see paragraphs 4.113 – 119), Hilton Action on Traffic (paragraphs 4.130 – 4.136) and a number of individual householders.

Air quality

- 7.44 Huntingdonshire District Council's environmental health officer has concluded that the proposed development would not lead to a breach in national air quality objectives or an unacceptable risk from air pollution and considers that there is not sufficient evidence to justify objecting to the application on air quality grounds. Aware that this matter is of great concern to local residents, the County Council, as stated at paragraph 1.3 above, engaged Air Quality Consultants (AQC) to provide independent advice on the impact of the HGV traffic generated by the proposed development on air quality. AQC assessed information provided by the applicant and the representations made by third parties and conclude that although there would be changes in the annual mean nitrogen dioxide and PM10 concentrations as a result of the increase in HGV traffic, these changes would be negligible and would not affect compliance with air quality objectives. The County Council's Public Health team have taken into account AQC's technical comments and advise that any adverse health effects on the general population from the traffic generated by the proposed development are likely to be negligible.

Noise from HGV traffic

- 7.45 As stated in paragraph 1.3 above the County Council engaged Acoustic Associates to provide independent advice on the noise impact of the proposed development. Noise from the mineral extraction operations are dealt with separately (see paragraphs 7.58 – 7.62). Acoustic Associates assessed the information provided by the applicant and the representations made by third parties and conclude that road traffic noise is not likely to increase by more than 1 dB as a result of the HGV movements generated by the proposed development. They have advised that road traffic noise levels are already very high and significantly above the WHO recommended levels and the contribution of the additional HGVs would be insignificant.
- 7.46 To conclude this section on traffic and highways, provided that the access to the site is constructed in accordance with the submitted design; that the level of HGV traffic does not exceed what the application has been assessed on; and the HGV traffic follows the proposed route it is considered that the proposed development would comply with MWCS policies CS32 and CS34, ECLP policies ENV9 and COM7 and MWLP policy 23. Paragraph 111 of the NPPF states that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." In the view of the highway authority these tests have not been met and there is no justifiable reason to refuse planning permission on grounds of the impact of the traffic that would be generated by the proposed development.

Designated and protected sites

- 7.47 The application site's relationship to designated sites is set out in paragraph 3.3 above. MWCS policy CS35, ECLP Policy ENV7 and WMLP Policy 20 seek to protect sites designated for their biodiversity and geodiversity. Natural England is satisfied that the proposed development is unlikely to have any adverse impact on the integrity of the Ouse Washes SSSI, SAC, SPA and Ramsar site subject to mitigation measures being implemented and secured through appropriate planning conditions. They have taken into account the Environment Agency's review of the latest Hydrogeological Impact

Assessment. The County Council has carried out a Habitat Regulations Assessment which has been approved by Natural England who were satisfied with the conclusion that the proposed development will not have an adverse effect on the integrity of the Ouse Washes European site. This is based on the findings of the applicant's Hydrogeological Impact Assessment including confirmation that the Ouse Washes, located 291 metres from the proposed development, lies significantly beyond the 144 metres dewatering zone of influence for the proposed reservoir and the delivery of the proposed mitigation measures being secured through planning conditions.

- 7.48 It is considered that the proposed development would not have an unacceptable adverse impact on areas designated as having nature conservation importance so is in accordance with MWCS policy CS35, ECLP Policy ENV7, MWLP Policy 20 and NPPF paragraph 174 (a).

Ecology and protected species

- 7.49 MWCS policy CS35, ECLP Policy ENV7, MWLP Policy 20 and NPPF paragraph 180 (d) seek to protect and enhance biodiversity. The applicant has provided an Ecological Management Plan (EMP). The measures to safeguard protected species are considered satisfactory in principle but updated surveys should be carried out as recommended by Natural England and the CCC ecology officer. This can be secured by planning condition (see recommended condition 12). The submitted Dust Management Plan is also considered acceptable from an ecological point of view and can be secured by condition (see recommended condition 22). The EMP also outlines how the area of conservation grassland and wetland would be created at the restoration stage and managed thereafter. However, whilst the restoration scheme is acceptable in principle, further details are required and these could be secured by condition as recommended by Natural England and the CCC ecology officer (see recommended condition 13). With reference to paragraph 4.11 above, Haddenham Parish Council and Haddenham Conservation could be consulted on the detailed restoration scheme.
- 7.50 The Government confirmed in March 2019 that it intends to introduce "biodiversity net gain" in the forthcoming Environment Bill. Biodiversity net gain requires developers to ensure habitats for wildlife are enhanced and left in a measurably better state than they were pre-development. They must assess the type of habitat and its condition before submitting plans, and then demonstrate how they are improving biodiversity – such as through the creation of green corridors, planting more trees, or forming local nature spaces. The proposed reservoir site is intensively farmed arable land and for this reason has little biodiversity interest. It is considered that the proposed creation of approximately 4 hectares of conservation grassland and wetland would represent a net biodiversity gain but in order to comply with the East Cambridgeshire Natural Environment SPD this should be quantified. This has been picked up in recommended condition 13. It is noted that the RSPB recommend that the conservation and wetland area should be managed for 25 years (see paragraph 4.75) but it is considered that this would be disproportionate for size of the area and a minimum of 5 years as recommended by the ecology officer (see paragraph 4.69) should be required.
- 7.51 It is considered that with appropriate mitigation and the realisation of biodiversity net gain the proposed development could be carried out without unacceptable impacts on the ecological interest of the site and its surroundings so would comply with MWCS policy

CS35 ECLP policy ENV7, MWLP Policy 20 and NPPF paragraph 180 (d).

Agricultural land

- 7.52 MWCS policy CS38 and MWLP Policy 24 seek to protect the best and most versatile agricultural land (grades 1, 2 and 3a). The NPPF at paragraph 174 (a) states that planning decisions should “contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan”.
- 7.53 The approximately 28 hectares of land that would be disturbed by the proposed development fall roughly equally within grades 2, 3a and 3b. The proposed reservoir development would be within a wider area of predominantly grade 1 and grade 2 land where there is relatively little scope to locate it entirely within grade 3b land. The uses of the topsoil and subsoil stripped from the footprint of the reservoir that are described in paragraph 2.7 above are considered acceptable. Natural England welcomes the reuse of a significant proportion of the topsoils in a sustainable manner to enhance the soil horizon across the remainder of the farm holding. It is considered that this would be in accordance with MWCS policy CS38 and MWLP Policy 24 and NPPF paragraph 174 (a).

Historic environment

- 7.54 The proposed development site is located in an important archaeological location, surrounded by numerous scheduled monuments of Neolithic long barrows and cemeteries of Bronze Age round barrows. There are no designated heritage assets close to the site which are likely to be impacted by the proposed development. The archaeological interest of the proposed development area has been mapped and because the mineral extraction would have a total impact on the remains an archaeological mitigation strategy is required and this could be secured by condition as recommended by the Historic Environment Team in paragraph 4.85. It is considered that with this mitigation in place the proposed development would comply with MWCS policy CS36, ECLP policy ENV14 and MWLP Policy 21.

Visual impact

- 7.55 MWCS policy CS33, ECLP policy ENV1, MWLP Policy 17 and paragraph 174 of the NPPF seek to protect the landscape. The application site is within a flat, intensively farmed landscape which is typical of the fens. It does not lie in or near an area designated for its special landscape value. The locations of the closest residential properties are set out in paragraph 3.1 above. The proposal does not include any permanent buildings, plant or machinery. It is proposed that the sand and gravel would be processed within the eastern part of the site using plant which would be approximately 6.3 metres high at its highest point (the top of the feed conveyor). Most of the plant would be less than 5 metres high. Unprocessed “as dug” sand and gravel would be held in a stockpile with a maximum height of 5 metres. Three small temporary buildings (6 metres x 3 metres x 2.5 metres high) would be located close to the site entrance. The processing area would be enclosed to the east and south by a 5 metre high subsoil acoustic screening mound. The southern (roadside) and part of the western boundary of the development site would be defined by a 3 metre high topsoil storage mound as described in paragraph 2.13 above.

- 7.56 The application was accompanied by a landscape and visual impact assessment which concludes that the proposed development would have some adverse visual effects during the construction (mineral extraction) phase, particularly from viewpoints close to the site. Willow Farm, a bungalow close to the southwest corner of the site, would be most affected by the soil stripping phase but this would be reduced once the 3 metres high topsoil perimeter bund was in place. Most of the activities would be screened by the soil bunds along the road frontage and the western and eastern boundaries and they would be temporary.
- 7.57 Once completed the reservoirs would have little impact in the landscape due to its low lying nature with the exception of views from the A1123. These would be transient and the changes would be from fields to open water providing a degree of visual interest. For the reasons set out in paragraphs 7.55 and 7.56 it is considered that the proposed development would not have a significant additional impact on the landscape. Any impacts would be limited to a period of 6 years. It is considered that the proposal complies with MWCS policy CS33, ECLP policy ENV1, MWLP Policy 17 and NPPF paragraph 174.

Operating hours and noise

- 7.58 NPPF paragraph 211 states that “In considering proposals for mineral extraction, minerals planning authorities should: ... c) ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive properties;” MWCS policy CS34, ECLP policy ENV9, MWLP Policy 18 and NPPF paragraph 211 seek to protect surrounding land uses from the impacts of the development including noise. The proposed hours of operation set out in paragraph 2.10 above would be within what is classified as the daytime period except for the proposed departure of pre-loaded lorries between 06:00 and 07:00. The application was accompanied by a noise impact assessment which has been reviewed by the environmental health officers (EHO) at East Cambridgeshire and Huntingdonshire District Councils and by Acoustic Associates. The East Cambridgeshire EHO has suggested different (standard) hours for the construction phase. However, the whole of the development that would be regulated by the mineral planning authority would be construction so it is not considered reasonable to impose a shorter working day.
- 7.59 Planning Practice Guidance (PPG) provides advice on noise from mineral sites:

“Mineral planning authorities should aim to establish a noise limit, through a planning condition, at the noise-sensitive property that does not exceed the background noise level (LA90,1h) by more than 10dB(A) during normal working hours (0700-1900). Where it will be difficult not to exceed the background level by more than 10dB(A) without imposing unreasonable burdens on the mineral operator, the limit set should be as near that level as practicable. In any event, the total noise from the operations should not exceed 55dB(A) LAeq, 1h (free field). For operations during the evening (1900-2200) the noise limits should not exceed the background noise level (LA90,1h) by more than 10dB(A) and should not exceed 55dB(A) LAeq, 1h (free field). For any operations during the period 22.00 – 07.00 noise limits should be set to reduce to a minimum any adverse impacts, without imposing unreasonable burdens on the mineral operator. In any event the noise limit should not exceed 42dB(A) LAeq,1h (free field) at a noise sensitive property.”

- 7.60 Acoustic Associates (AA) have reviewed the applicant's noise impact assessment and challenged some of its methods, assumptions and conclusions. Essentially AA considered that the background noise level was lower and the calculated noise level from the proposed development would be higher for the mineral extraction and construction phase. The applicant's criterion of 54dB(A) LAeq, 1h (free field) (background level + 10 dB) would be exceeded at one of the three receptor sites. Following the provision of further information by the applicant, AA considered the noise predictions to be satisfactory. This work was based on the original proposal which included a reservoir and mineral extraction at the southwest corner of the site close to Willow Farm Bungalow. In the current scheme the only part of the development close to this property would be the perimeter topsoil bund which would be constructed over a short period of time (see recommended condition 24 (iii)). The impact on the other two receptors, Third Bridge Holiday Home to the south of the A1123 opposite the first extraction phase and close to the processing area and Willow Hall Farm approximately 300 metres southeast of the site access would be largely unaffected by the amended scheme. It is proposed that daytime operations be subject to a noise limit of 54dB(A) LAeq, 1h (free field) at any noise sensitive property. According to AA's calculations this would be exceeded at Third Bridge Holiday Home. It is considered that in order to comply with the recommended limit, the main noise sources (the loading shovel and dumpers) would not be used at the same time when operations are close to the property. It is recommended that the developer be required to carry out monitoring to assess whether the limits are being complied with (see recommended condition 25).
- 7.61 The only activities that would take place within the most sensitive night time period would be the departure of pre-loaded lorries and AA is satisfied that the noise generated would be within the PPG level of 42dB(A) LAeq, 1h (free field) at the nearest noise sensitive properties. Acoustic Associates noted that if the construction of the perimeter topsoil bund would take place for longer than 8 weeks additional assessment and mitigation would need to be undertaken (see paragraphs 4.101 - 4.102 above). The applicant has agreed to a condition limiting bund construction to no more than 14 days in any calendar year (see recommended condition 24(iii)).
- 7.62 It is considered that provided the conditions outlined in paragraph 7.60 are imposed the proposed development would comply with MWCS policy CS34, ECLP policy ENV9, MWLP Policy 18 and NPPF paragraph 211 in respect of noise.

Dust

- 7.63 MWCS policy CS34, ECLP policy ENV9, MWLP Policy 18 and NPPF paragraph 211 seek to protect surrounding land uses from the impacts of the development. A Dust Management Scheme (Document 12) was submitted. The proposed mitigation measures are those typically employed on sand and gravel extraction sites. They are considered to be satisfactory and could be secured by condition. It is not considered necessary to duplicate these measures in a CEMP as recommended by the EHO. The CEMP recommended in condition 10 would encompass wider ecological protection measures.
- 7.64 It is considered that provided the dust action plan is secured by condition the proposed development would comply with MWCS policy CS34, ECLP policy ENV9, MWLP Policy 18 and NPPF paragraph 211 in respect of dust.

8. Conclusion

- 8.1 The principle of providing a sustainable and secure source of water to irrigate crops would be in accordance with the broad policy aims of creating resilience to the effects of climate change. The development has been proposed on the basis of an agricultural need. The benefits to the farming business have been assessed by an independent expert and although he had some reservations, concluded that the capacity of the reservoirs was justified. The proposed development would give rise to economic mineral and has been tested against MWCS policy CS42 and MWLP Policy 9. It is considered that the criteria of these policies are met. It is not considered that the proposed development would materially prejudice the realisation of the Block Fen / Langwood Fen Master Plan restoration aspirations.
- 8.2 There are two principal areas of concern that have been expressed strongly by third parties: the impact on groundwater and the impact of HGV traffic through villages. The Environment Agency does not raise an objection and has advised that although the proposal is not entirely without risk, the potential impacts on groundwater can be addressed by a programme of monitoring and if necessary, mitigation. The Haddenham Level Drainage Commissioners and A G Wright and Sons Farms Ltd object to the proposed development because they consider that dewatering after December would not allow the groundwater to recharge and would have an adverse impact on neighbouring land and its agricultural productivity.
- 8.3 Parish councils, local community and environmental organisations and many individuals have raised objections on the grounds that the additional HGV traffic would compromise highway safety and increase already high levels of air and noise pollution which are experienced close to the A1123. The applicant has proposed that traffic would be routed to and from the west and would agree to a routeing agreement being secured by condition. The highway authority's advice is that the proposed level of traffic would not be unacceptable in terms of either safety or congestion on the road network.
- 8.4 The mineral planning authority commissioned specialist independent advice on both noise and air quality. Acoustic Associates acknowledge that the existing noise levels on Earith High Street are already very high but conclude that the increase from traffic generated by the proposed development would be insignificant. Similarly, Air Quality Consultants conclude that the additional traffic would not give rise to significant air quality impacts.
- 8.6 The known and potential impacts of the proposed development which have been addressed in detail in section 7 of this report have been balanced against the suggested benefits which would be the provision of a secure and sustainable supply of irrigation water which would make the applicants' agricultural business more resilient to the effects of climate change. It is considered that the proposed development would, subject to conditions, comply with the relevant national and development plan policies and in this instance the benefit is considered to outweigh other material considerations so should be supported.
- 8.7 This recommendation takes into account Natural England's advice in respect of the Ouse Washes and the Environment Agency's advice on potential impacts on ground and surface water. It also takes into account the MPA's Habitats Regulations Assessment (Appendix A).

9. Recommendation

9.1 It is recommended that permission be granted subject to the following conditions:

Advisory Note:

The Town & Country Planning (Development Management Procedure) (England) Order 2015 requires the planning authority to give reasons for the imposition of pre-commencement conditions. Conditions 5, 10, 11, 12, 13, and 25 below require further information to be submitted, or works to be carried out, to protect the historic, natural and human environment and are therefore attached as pre-commencement conditions. The developer may not legally commence new development on site until these conditions have been satisfied.

1. Site area

This permission relates to the land outlined and shaded in red on drawing no. 01-18-WHF Location Plan dated 17/04/18 (received 14 January 2021) referred to in these conditions as “the Site”.

Reason: To define the permission for the avoidance of doubt.

2. Commencement

The development hereby permitted shall be commenced not later than three years from the date of this permission. Within seven days of the commencement of development, the developer shall notify the mineral planning authority in writing of the exact commencement date.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Act 2004.

3. Approved plans

The development hereby permitted shall not proceed except in accordance with the following approved drawings unless otherwise stated in this permission or as amended by the information approved as required by the other conditions of this permission:

- i) 01-18-WHF Location Plan dated 17/04/2018 (received 14 January 2021);
- ii) 03-18-B-WHF Reservoir Design dated 20/03/20 (received 14 January 2021);
- iii) 04-18-B-WHF Working Proposals dated 25/03/20 (received 14 January 2021);
- iv) 05-18-A-WHF Site Access and Infrastructure dated 03/06/19 (received 14 January 2021);
- v) 06-18-B-WHF Working Proposals dated 25/03/20 (received 14 January 2021);
- vi) 07-18-WHF Wheelwash and Weighbridge Facility dated 02/05/2019 (received 14 January 2021);
- vii) 08-18-WHF Mineral Processing Plant dated 24/05/2019 (received 14 January 2021);
- viii) Figure WHF7a – Cross Section A-A (following page 22 Document 30 Regulation 25 Request (2) January 2021 (received 14 January 2021);
- ix) Figure WFH8a – Cross Section B-B (preceding page 25 Document 30

- Regulation 25 Request (2) January 2021 (received 14 January 2021); and
x) 19413-02-2 Rev D Proposed Site Access dated July21 (received 20 July 2021)

Reason: To ensure the development is carried out in accordance with the approved plans and to define the site and preserve the character, appearance and quality of the area in accordance with the Cambridgeshire and Peterborough Minerals and Waste Core Strategy DPD (July 2011) policies CS25, CS33, CS34, CS35 and CS38, East Cambridgeshire Local Plan (April 2015) policies ENV1, ENV2 and ENV9 and the emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 17, Policy 19, Policy 20 and Policy 24.

4. Timescale of permission

Extraction, processing and despatch of mineral shall cease no later than 5 years from the date of commencement referred to in condition 2. Within seven days of the cessation of mineral extraction, processing and despatch the operator shall notify the mineral planning authority in writing of the date on which the mineral extraction, processing and despatch ceased. The Site shall be completed in accordance with drawing no. 03-18-B-WHF Reservoir Design dated 20/03/20 (received 14 January 2021) within 1 year of the cessation of mineral extraction and processing.

Reason: To ensure the completion and progressive restoration of the site within an approved timescale in accordance with the Cambridgeshire and Peterborough Minerals and Waste Core Strategy DPD (July 2011) policies CS25 and CS42(e) and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 9 (e) and Policy19.

5. Archaeology (pre-commencement Written Scheme of Investigation)

No development shall commence until the applicant, or their agents or successors in title has secured the implementation of a programme of archaeological work in accordance with a Written Scheme of Investigation that has been submitted to and approved in writing by the mineral planning authority. The pre-commencement aspects of archaeological work shall include:

- i) Submission of a Written Scheme of Investigation that sets out the methods and timetable for the investigation of archaeological remains in the development area starting with the evaluation of the impact areas which responds to the requirements of the local authority archaeology brief including a strategy for the local or museum-based display of selected evidence; and
- ii) Completion of mitigation fieldwork in accordance with the approved Written Scheme of Investigation.

Reason: To ensure that the archaeological interest of the site is investigated and recorded in accordance with the Cambridgeshire and Peterborough Minerals and Waste Core Strategy DPD (July 2011) policy CS36, East Cambridgeshire Local Plan (April 2015) policy ENV14, emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 21 and paragraph 205 of the National Planning Policy Framework (February 2019). This is a pre-commencement condition because it is necessary to agree the programme of archaeological work in order to ensure that underlying archaeology is

protected before any development take place.

6. Archaeology (post-fieldwork)

The post-fieldwork sections of the archaeology programme shall be fully implemented in accordance with the timetable and provisions of the approved Written Scheme of Investigation referred to in condition 5. This stage of the programme shall follow the signed-off fieldwork and shall comprise:

- i) Completion of a Post-Excavation Assessment report and an Updated Project Design for the analytical work to be submitted for approval within six months of the completion of fieldwork, unless otherwise agreed in advance with the mineral planning authority;
- ii) Completion of the approved programme of analysis and production of an archive report; submission of a publication synopsis and preparation of a publication report to be completed within 18 months of the approval of the Updated Project Design, unless otherwise agreed in advance with the mineral planning authority;
- iii) Deposition of the physical archive in the Cambridgeshire Archaeological Archive Facility or another appropriate store approved by the mineral planning authority and deposition of the digital archive with the Archaeology Data Service or another CoreTrustSeal certified repository within 1 year of completion of (ii).

Reason: To ensure that the archaeological interest of the site is investigated and recorded in accordance with the Cambridgeshire and Peterborough Minerals and Waste Core Strategy DPD (July 2011) policy CS36, East Cambridgeshire Local Plan (April 2015) policy ENV14, emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 21 and paragraph 205 of the National Planning Policy Framework (February 2019).

7. Groundwater monitoring

The development hereby permitted shall be carried out in strict accordance with the Proposed Groundwater Level Monitoring Strategy (Appendix 2 Document 31(B) Revised Hydrogeological Impact Assessment April 2021) (received 14 May 2021) which sets out the maximum dewatering periods for each reservoir: paragraph A2.4 for the construction of Reservoir A; paragraph A2.5 for the construction of Reservoir B; and paragraph A2.6 for the construction of Reservoir C.

Reason : Monitoring is required to identify risks to other water resources namely the nearby abstraction reaches to the south of the development site which fall in the identified radius of influence of the dewatering activity in accordance with Cambridgeshire and Peterborough Minerals and Waste Core Strategy DPD (July 2011) policy CS39, East Cambridgeshire Local Plan (April 2015) policy ENV9 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 22.

8. Groundwater monitoring report

During and prior to the construction phase an annual monitoring report showing the groundwater levels relative to the agreed trigger levels in the Proposed Groundwater Level Monitoring Strategy referred to in condition 7 shall be submitted to the mineral planning

authority. If the trigger levels are not met the Hydrogeological Impact Assessment and mitigation measures shall be reassessed before any further mineral extraction or dewatering takes place.

Reason: To be confident that the assumptions in the HIA are holding true and any impacts which have not been identified or are greater than envisaged are assessed and enhanced mitigation put in place if required as set out in section 3.15.1 of Document 31 Revised Hydrogeological Impact Assessment (January 2021) and Cambridgeshire and Peterborough Minerals and Waste Core Strategy DPD (July 2011) policy CS39, East Cambridgeshire Local Plan (April 2015) policy ENV9 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 22.

9. Reservoir construction

Within 28 days of the completion of the construction of each reservoir as identified on drawing no.03-18-B-WHF Reservoir Design dated 20/03/20 a report or Construction Quality Assurance (CQA) validation completed by a competent engineer shall be submitted to the mineral planning authority providing details of the lining and side wall construction of the reservoirs to demonstrate that the reservoir is sealed from the sand and gravel aquifer by an impermeable boundary of adequate construction in accordance with section 3.3 of Document 30 Regulation 25 Request (2) (January 2021).

The reservoirs shall not be filled until the report or CQA validation has been approved by the mineral planning authority. The reservoirs shall be maintained thereafter in accordance with the recommendations made in the report or CQA validation.

Reason: The applicant's feasibility and sustainability relies on the ability to ensure the reservoirs are a discrete waterbody disconnected from the surround water environment in this case the sand and gravel aquifer in accordance with Cambridgeshire and Peterborough Minerals and Waste Core Strategy DPD (July 2011) policy CS39, East Cambridgeshire Local Plan (April 2015) policy ENV9 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 22.

10. Water quality

No development shall commence until a water quality monitoring and maintenance scheme has been submitted to and approved in writing by the mineral planning authority. The scheme shall include a timetable of monitoring and provide for the submission of reports to the mineral planning authority. The reports specified in the approved scheme shall include details of any necessary contingency action arising from the monitoring.

The development shall be carried out in accordance with the approved scheme.

Reason: To ensure that the development does not pose any further risk to the water environment by managing any ongoing issues and completing all necessary long-term remediation measures in accordance with Cambridgeshire and Peterborough Minerals and Waste Core Strategy DPD (July 2011) policies CS35 and CS39, East Cambridgeshire Local Plan (April 2015) policy ENV9, emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 20 and Policy 22 and paragraph 174 of the National Planning Policy Framework. This is a pre-commencement condition because it is necessary

for water quality monitoring to be agreed and in place before any development takes place.

11. Surface water drainage

No development shall commence until a surface water drainage scheme, based on sustainable drainage principles, has been submitted to and approved in writing by the mineral planning authority. The scheme shall be based upon the principles within the Flood Risk Assessment and Hydrological Review (ref: H8201) dated April 2018 and the Flood Risk Assessment & Hydrological Summary - Addendum (ref: H8201-ADD) dated 17 June 2019 prepared by Amber Planning, comply with the hierarchy of drainage options set out in the National Planning Policy Framework (February 2019) and Planning Practice Guidance and shall also include:

- a) Detailed drawings of the entire proposed surface water drainage system, including levels, gradients, dimensions and pipe reference numbers;
- b) Full details of the proposed attenuation and flow control measures;
- c) Temporary storage facilities;
- d) Details of overland flood flow routes in the event of system exceedance, with demonstration that such flows can be appropriately managed on site without increasing flood risk;
- e) Full details of the maintenance/adoption of the surface water drainage system;
- f) Measures taken to prevent pollution of the receiving groundwater and/or surface water; and
- g) A timetable for implementation.

The development shall be carried out in accordance with the approved scheme.

Reason To ensure that the proposed development can be adequately drained and to ensure that there is no increased flood risk on or off site resulting from the proposed development in accordance with paragraphs 167 and 169 of the National Planning Policy Framework (February 2019), East Cambridgeshire Local Plan (April 2015) policy ENV8 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 22. This is a pre-commencement condition because it is necessary for surface water drainage to be agreed and in place before any development takes place.

12. Construction environmental management plan

No development shall commence until a construction environmental management plan (CEMP) has been submitted to and approved in writing by the mineral planning authority. The CEMP shall include but not be limited to the following:

- a) Risk assessment of potentially damaging construction activities;
- b) Identification of “biodiversity protection zones”;
- c) Practical measures (both practical measures and sensitive working practices) to avoid or reduce impacts during construction including but not limited to ditches;
- d) The location and timing of sensitive works to avoid harm to biodiversity features;
- e) The times during construction when specialist ecologists need to be on site to oversee works;
- f) Responsible persons and lines of communication;
- g) Use of protective fences, exclusion barriers and warning signs;

- h) Updated species surveys and mitigation proposals including but not limited to water vole; and
- i) Monitoring and reporting.

The development shall be carried out in accordance with the approved CEMP.

Reason: To minimise the impact of the development on wildlife and wildlife habitats in accordance with the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policy CS35, East Cambridgeshire Local Plan (April 2015) policy ENV7 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 20. This is a pre-commencement condition because it is necessary to agree the detailed information relating to protection of the environment and biodiversity during the construction phase before any development takes place.

13. Restoration and aftercare scheme

No development shall commence until a detailed restoration and management scheme for the area shown as Conservation grassland with wetland (reduced area) on drawing no. 06-18-B-WHF Wetland Area dated 20/03/2020 has been submitted to and approved in writing by the mineral planning authority. The scheme shall demonstrate how the net gain in biodiversity has been calculated and shall include but not be limited to:

- a) Soil / landscape specification demonstrating how a low-nutrient soil profile will be created from on-site subsoils and top-soil, to enable wildflower grassland to establish, including:
 - i) Soil testing to create acceptable pH / nutrient-levels for the soil;
 - ii) Measures to reduce residual fertility (e.g. growing a crop prior to sowing);
 - iii) Treatment of high weed burden associated with arable reversion to meadow;
- b) Landscape specification for the hedgerow;
- c) Details of the scrapes, including:
 - i size and profile;
 - ii. expected water-levels (taking into consideration climate change projections;
- d) Final levels of restored land;
- e) Water vole mitigation strategy (if required); and
- f) Management for at least 5 years including annual habitat assessments against specific target conditions to determine whether establishment is taking place or whether any remedial action is required, such as re-seeding, replanting or weed control.

The development shall be carried out in accordance with the approved restoration and aftercare scheme.

Reason: To minimise the impact of the development on wildlife and wildlife habitats in accordance with the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policy CS35, East Cambridgeshire Local Plan (April 2015) policy ENV7, East Cambridgeshire District Council Natural Environment – Supplementary Planning Document (SPD) (September 2020) and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 20. This is a pre-commencement condition because it is necessary for the restoration details to be designed into the scheme and to ensure that the net gain in biodiversity can be

achieved.

14. Access construction

No soil stripping shall commence until the junction of Doles Drove and the A1123 Hillrow Causeway has been constructed in accordance with drawing no.19413-02-2 Rev D Proposed Site Access dated July21.

Reason: In the interests of highway safety in accordance with the Cambridgeshire and Peterborough Minerals and Waste Core Strategy DPD (July 2011) policy CS32, East Cambridgeshire Local Plan (April 2015) policy COM7 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 23.

15. Vehicular access

Vehicular access to the site shall only be from the location shown as Access point on drawing no. 03-18-B-WHF Reservoir Design dated 20/03/20.

Reason: In the interests of highway safety in accordance with the Cambridgeshire and Peterborough Minerals and Waste Core Strategy DPD (July 2011) policy CS32, East Cambridgeshire Local Plan (April 2015) policy COM7 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 23.

16. Prevention of mud on the public highway

No soil stripping shall commence until the Access road shown on drawing no. 05-18-A-WHF dated 03/06/19 has been constructed in accordance with paragraph 3.2.3 of Document 30 Regulation 25 Request (2) dated January 2021. Thereafter HGVs and the Access road shall be cleaned as necessary to prevent materials including mud and debris being deposited on the public highway. The surface of the Access road and wheel wash shall be retained and maintained for the duration of the development hereby permitted.

Reason: In the interests of highway safety and safeguarding local amenity in accordance the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policies CS32 and CS34, East Cambridgeshire Local Plan (April 2015) policy COM7 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 23.

17. Restriction of heavy goods vehicle (HGV) movements

The total number of HGV movements to and from the Site shall not exceed the following maximum limits:

- 100 movements per day on Mondays to Fridays except bank and public holidays;
- 50 movements per day on Saturdays; and
- No movements on Sundays and bank and public holidays.

For the avoidance of doubt a vehicle entering the site counts as one movement and a vehicle exiting the site counts as a separate movement. There shall be no HGV movements outside the hours set out in condition 20.

Reason: It has not been demonstrated that the public highway is capable of safely accommodating higher number of vehicle movements and in the interest of the amenity of occupiers of nearby properties in accordance with the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policies CS32 and CS34, East Cambridgeshire Local Plan (April 2015) policy COM7 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 23 and Policy 18.

18. HGV records

A record of the date and time of all HGV movements to and from the site shall be kept and made available to the mineral planning authority within seven days of a written request.

Reason: To enable compliance with condition 17 to be monitored in accordance with the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policies CS32 and CS34, East Cambridgeshire Local Plan (April 2015) policy COM7 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 23 and Policy 18.

19. HGV routeing agreement

The site shall not be operated except in accordance with the Traffic Management Scheme dated July 2021.

Reason: In the interests of limiting the effects on local amenity to control the impacts of the development and to comply with the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policy CS34, East Cambridgeshire Local Plan (April 2015) policy COM7 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 18.

20. Hours of operation

No development including the entry and exit of HGVs shall take place within the site outside the hours of:

07:00 – 19:00 on Mondays to Fridays except bank or public holidays; and
07:00 – 13:00 on Saturdays.

Except that pre-loaded HGVs may leave the site between 06:00 and 07:00 on Mondays to Fridays except bank or public holidays.

No development authorised by this permission shall take place on Sundays or on bank or public holidays.

Reason: To minimise disturbance to residents and users of the area in accordance with the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policy CS34, East Cambridgeshire Local Plan (April 2015) policy ENV9 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 18.

21. Stockpile heights

No stockpile of processed mineral, unprocessed mineral or clay and no overburden or subsoil storage mound shall exceed a height of 5 metres measured from the adjacent ground level except the Subsoil storage area on backfill shown on drawing no. 04-18-B-WHF shall not exceed a height of 3 metres when measured from the adjacent ground level. No topsoil storage mound shall exceed a height of 3 metres measured from the existing adjacent ground level.

Reason: In the interests of visual amenity in accordance with the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policies CS33 and CS34, East Cambridgeshire Local Plan (April 2015) policies ENV1 and ENV2 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 17 and Policy 18 and in order to protect the integrity of the soils for restoration in accordance with Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policy CS38 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 24.

22. Dust controls and mitigation measures

The development hereby permitted shall not take place except in accordance with the Dust Management Scheme Document 12 (received 23 August 2019).

Reason: To minimise the impact of the development on wildlife and wildlife habitats in accordance with the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policy CS35, East Cambridgeshire Local Plan (April 2015) policy ENV9 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 20.

23. Maintenance, silencers and reversing alarms

All vehicles, plant and machinery operated on the site shall be maintained in accordance with the manufacturers' specifications at all times and shall be fitted with effective silencers that shall be used at all times. All vehicles that are fitted with reversing alarms shall be fitted with 'white noise' type or similar, reversing alarms.

Reason: To protect the amenities of occupiers of nearby properties in accordance with the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policy CS34, East Cambridgeshire Local Plan (April 2015) policy ENV9 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 18.

24. Noise limits

Noise shall be limited to the following levels:

- i. Between 07:00 and 19:00 noise emissions attributable to the development hereby permitted shall not exceed 54 dB LAeq, 1 hour (free field) at the boundary of any occupied residential property.

- ii. Between 06:00 and 07:00 noise emissions attributable to the development hereby permitted shall not exceed 42 dB LAeq, 1 hour (free field) at the boundary of any occupied residential property.
- iii. During the construction and removal of the Topsoil storage mound shown on drawing no. 04-18-B-WHF the equivalent continuous noise level when measured at any occupied residential property, shall not exceed 65dB LAeq, 1 hour (free field). Such temporary operations shall not take place for more than 14 days in any 12 month period.

Reason: To protect the amenities of occupiers of nearby properties in accordance with the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policy CS34, East Cambridgeshire Local Plan (April 2015) policy ENV9 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 18.

25. Noise monitoring

No development shall commence until a noise monitoring scheme has been submitted to and approved in writing by the mineral planning authority.

The development shall be carried out in accordance with the approved scheme.

Reason: To enable the developer to demonstrate whether the noise limits in condition 22 are being complied with to protect the amenities of occupiers of nearby properties in accordance with the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policy CS34, East Cambridgeshire Local Plan (April 2015) policy ENV9 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 18. This is a pre-commencement condition because it is necessary for noise monitoring to be agreed and in place before any development takes place.

26. Lighting

No security lights or floodlighting shall be installed except in accordance with details that have been submitted to and approved in writing by the mineral planning authority. Such lighting shall be for the construction period only.

Reason: To protect the amenity of local residents and the rural environment in accordance with Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policy CS34, East Cambridgeshire Local Plan (April 2015) policy ENV9 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 18.

27. Importation of materials

No mineral, waste or other materials shall be imported to the site for processing, construction or disposal.

Reason: This development was not part of the proposal so the potential environmental

impacts have not been assessed in accordance with the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policies CS32, CS34, CS35 and CS39 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 18, Policy 20, Policy 22 and Policy 23.

28. Surplus soil

No subsoil or overburden shall be removed from the site. No topsoil shall be removed from the site other than for use on the applicant's land shown edged and shaded blue on drawing no. 01-18-WHF dated 17/04/2018 (received 14 January 2021).

Reason: To ensure that surplus soils are used sustainably in accordance with the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policy CS38 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 24.

29. Phasing

No development other than subsoil storage shall take place in the area shown as Reservoir C on drawing no. 03-18-B-WHF Reservoir Design until Reservoir A has been filled with water and capable of being used for irrigating land.

Reason: To ensure the early delivery of irrigation water and completion and progressive restoration of the site within an approved timescale in accordance with the Cambridgeshire and Peterborough Minerals and Waste Core Strategy DPD (July 2011) policies CS25 and CS42(e) and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021 Policy 9(e) and Policy 19.

30. Land contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the mineral planning authority) shall be carried out until the developer has submitted a remediation strategy detailing how this unsuspected contamination shall be dealt with and obtained written approval from the mineral planning authority. The remediation strategy shall be implemented as approved.

Reason: To protect and prevent the pollution of controlled waters from potential pollutants associated with current and previous land uses in accordance with National Planning Policy Framework paragraphs 174, 183, 184, the Environment Agency's Approach to Groundwater Protection (Formerly GP3), the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policy CS39, East Cambridgeshire Local Plan (April 2015) policy ENV9 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 22.

31. Soil handling

Soils shall be handled in accordance with the 'Good practice guide for handling soils' (MAFF; April 2000).

Reason: To ensure that the quality of the soil is maintained for its use in site restoration and elsewhere on the farm holding in accordance with the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policy CS38 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 24.

32. Site infrastructure

The mineral processing plant and weighbridge shown on drawing no. 05-18-A-WHF Site Access and Infrastructure dated 03/06/19 shall be removed from the site within 1 month of the cessation of mineral processing as specified in condition 4.

Reason: To ensure that the mineral processing area is restored in the interests of the visual amenity of the area in accordance with the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policies CS33 and CS34, East Cambridgeshire Local Plan (April 2015) policy ENV1 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 17 and Policy 18.

33. Use of the reservoir

The reservoirs hereby permitted shall only be used for agricultural irrigation and shall not be used for sailing, match fishing, shooting (including wildfowling) or by powered craft or for any other recreational use except for the purposes of pest control.

Reason: To ensure that the water is available for agricultural irrigation in accordance with the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policy CS42 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 9. To ensure no adverse impact on the Ouse Washes Special Protection Area and Ramsar site in accordance with the Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policy CS35, East Cambridgeshire Local Plan (April 2015) policy ENV7 and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 20.

34. Temporary buildings

The offices shown on drawing no. 05-18-A-WHF Site Access and Infrastructure dated 03/06/19 shall be securely anchored such that they are not a hazard during a flood event. They shall be removed from the Site within 1 month of the completion of the development in accordance with drawing no. 03-18-B-WHF Reservoir Design dated 20/03/20 (received 14 January 2021) as specified in condition 4.

Reason: Tidal Hazard Mapping indicates that the site could flood to a depth of greater than 2 metres. The findings of the Flood Risk Assessment (Document 3 April 2018) in relation to the likely duration, depths, velocities and flood hazard rating against the design flood event indicates that there will be a danger for all people including the general public and the emergency services.

35. Bonfires or Burning of Waste

There shall be no bonfires or burning of waste on the Site.

Reason: To ensure the environmental impact of the construction of the development is adequately mitigated in the interests of the amenity of nearby residents/occupiers. In accordance with Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy DPD (July 2011) policy CS34, East Cambridgeshire Local Plan (April 2015) policy ENV and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 18.

Informatives for applicant

Condition 7: Dewatering periods

Paragraphs A2.4 to A2.6 from the Proposed Groundwater Level Monitoring Strategy (Appendix 2 Document 31(B) Revised Hydrogeological Impact Assessment April 2021) (received 14 May 2021) have been reproduced below for ease of reference:

A2.4 During construction of Reservoir A (dewatering during October to December only) groundwater will be pumped out of the excavation into the adjacent IDB drainage system, with a fallow period during the spring and summer sensitive recharge/abstraction period to allow groundwater recovery and mitigate any potential effects on licensed surface water abstractions and on the adjacent Special Area of Conservation (SAC).

A2.5 During construction of Reservoir B (dewatering during October to February only) groundwater will be pumped out of the excavation into either Reservoir A or into the adjacent IDB drainage system, with a fallow period during the spring and summer sensitive recharge/abstraction period to allow groundwater recovery and mitigate any potential effects on licensed surface water abstractions and on the adjacent Special Area of Conservation (SAC). The Reservoir B void space will be topped up by pumping of clean water from Reservoir A.

A2.6 During construction of Reservoir C (dewatering during October to March only) groundwater will be pumped out of the excavation into either Reservoir A, Reservoir B or into the adjacent IDB drainage system, with a fallow period during the spring and summer sensitive recharge/abstraction period to allow groundwater recovery and mitigate any potential effects on licensed surface water abstractions and on the adjacent Special Area of Conservation (SAC). The Reservoir C void space will be topped up by pumping of clean water from Reservoirs A or B.

Condition 8 – The report should include information as per appendix 2 of the HIA Document 31 and in addition, quarterly groundwater level plots and groundwater level data from the offsite wells 13 to 15. Should trigger levels not be met a revised HIA mitigation measures should be produced in accordance with the HIA section 3.15.1. (from Environment Agency 17 February 2021).

Conditions 12 & 13 – The applicant is advised to use the CCC Ecology Officer's letters dated 23 April 2020 and 18 March 2021 to inform the CEMP and restoration and aftercare

schemes.

The applicant's attention is drawn to the Environment Agency's letters dated 12 November 2019 and 17 February 2021 which provide technical advice on dewatering, abstraction licences and the design of the reservoir.

Compliance with paragraph 38 of the National Planning Policy Framework (February 2019)

The applicant did not obtain pre-application advice or an environmental impact assessment scoping opinion. The mineral planning authority has worked with the applicant and statutory and other consultees to ensure that sufficient information was provided by the applicant to enable an informed decision to be made. The mineral planning authority has worked with the applicant and the Environment Agency to ensure that the planning conditions are relevant and necessary.

The creation of winter-filled reservoirs has been justified by the applicant and would provide a secure and sustainable supply of irrigation water which would make the applicants' agricultural business more resilient to the effects of climate change thereby improving the economic, social and environmental conditions of the area. It is considered that these benefits would outweigh the impacts on the environment and local residents which would be mitigated to acceptable levels by the design of the development and secured by planning conditions.

Source Documents

Link to the National Planning Policy Framework (July 2021) [National Planning Policy Framework - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/92623/nppf-2019.pdf)

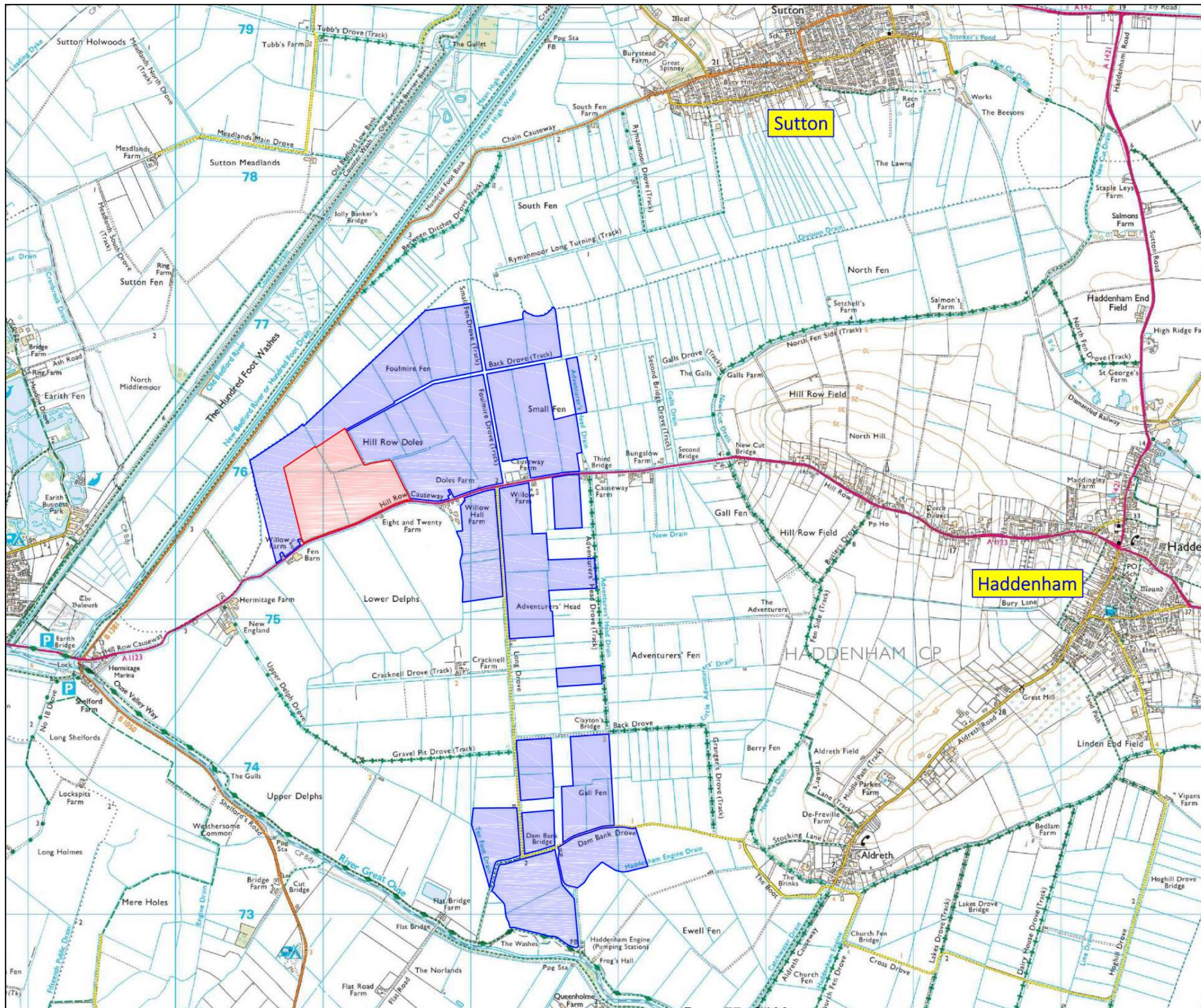
Link to the Cambridgeshire and Peterborough Minerals and Waste Core Strategy Development Plan Document (adopted July 2011) [Adopted minerals and waste plan - Cambridgeshire County Council](https://www.cambs.gov.uk/media/1000000/cpsd-core-strategy-development-plan-2011-2026.pdf)

Link to the East Cambridgeshire Local Plan (adopted April 2015) [East Cambridgeshire Local Plan 2015 | East Cambridgeshire District Council \(eastcambs.gov.uk\)](https://www.eastcambs.gov.uk/media/1000000/eclp-2015-2026.pdf)

Link to the East Cambridgeshire District Council Natural Environment – Supplementary Planning Document (SPD) (adopted 24 September 2020) [Supplementary Planning Documents | East Cambridgeshire District Council \(eastcambs.gov.uk\)](https://www.eastcambs.gov.uk/media/1000000/natural-environment-supplementary-planning-document-2020.pdf)

Link to the Cambridgeshire Flood & Water Supplementary Planning Document (adopted 14 July 2016) [Surface water and sustainable drainage systems \(SuDS\) planning - Cambridgeshire County Council](https://www.cambs.gov.uk/media/1000000/cfws-supplementary-planning-document-2016.pdf)

Link to the Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) [Emerging Minerals and Waste Local Plan - Cambridgeshire County Council](https://www.cambs.gov.uk/media/1000000/cpsd-minerals-and-waste-local-plan-2021.pdf)



© Crown Copyright 2017.
All rights reserved.
Licence number 100048891



0m 500m 1,000m
20mm = 500m (1:25,000 @ A3)

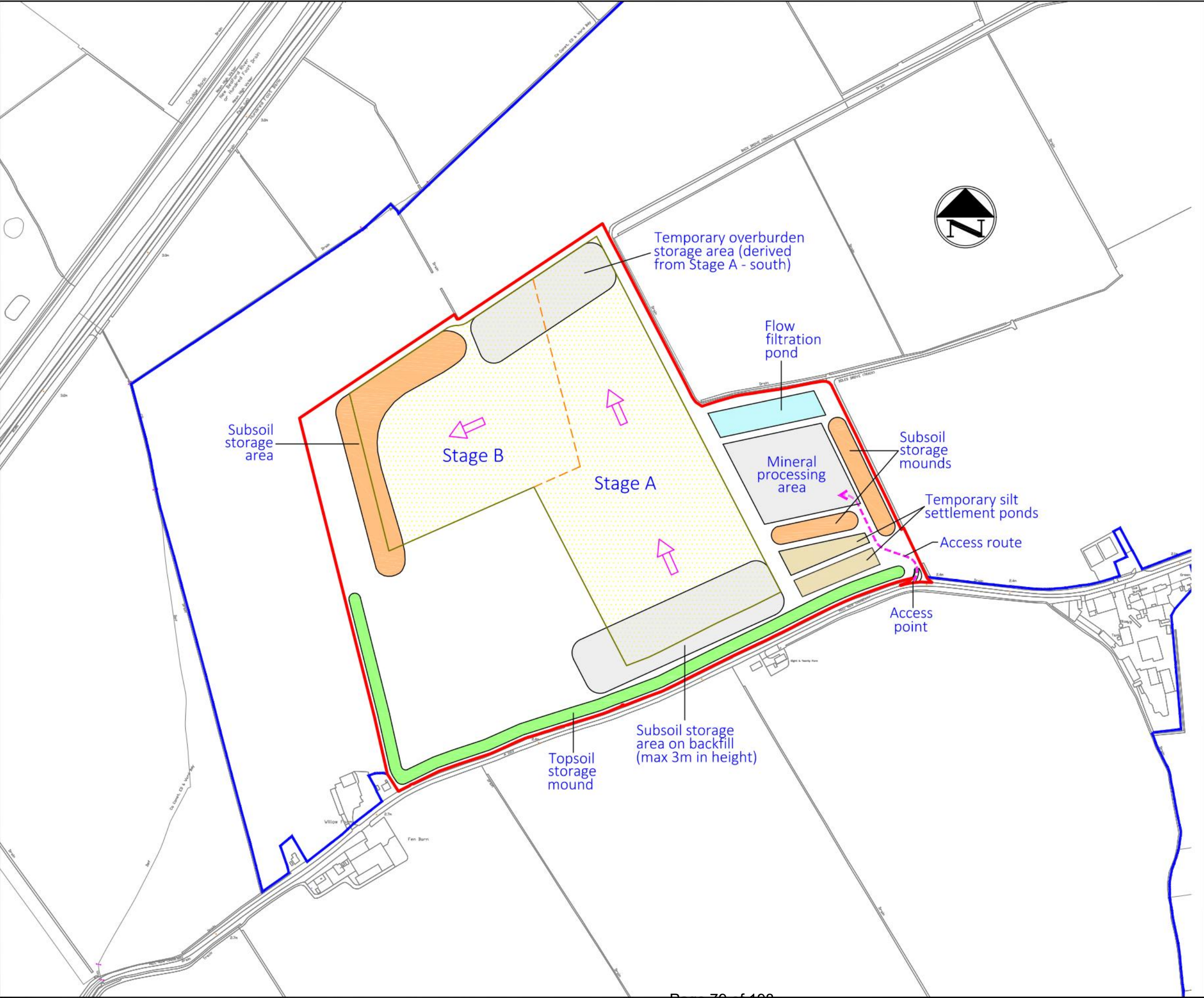
- Application area
- Other land under the Applicant's control

Scale:	1:25,000 @ A3
Date:	17/04/2018
Plan Ref:	01-18-WHF

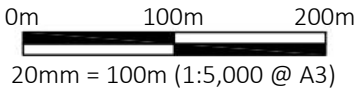
**WILLOW HALL FARM,
HADDENHAM**

LOCATION PLAN





© Crown copyright and database rights 2019.
Ordnance Survey 0100031673



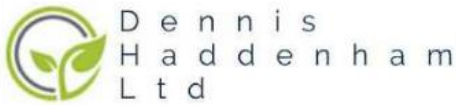
- Site boundary
- Other land under the Applicant's control
- Mineral extraction area
- Direction of working

Rev. B	25/03/20	Amended the mineral extraction area.
Rev. A	04/06/19	Amended sequence of working, plus additional mounds.

Scale:	1:5,000 @ A3
Date:	17/04/2018
Plan Ref:	04-18-B-WHF

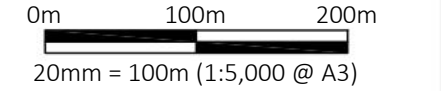
WILLOW HALL FARM,
HADDENHAM

WORKING PROPOSALS





© Crown copyright and database rights 2019. Ordnance Survey 0100031673



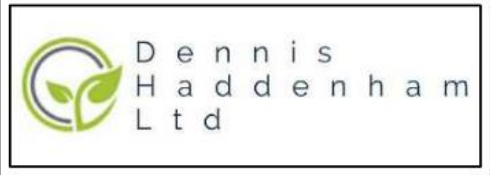
- Site boundary
- Other land under the Applicant's control
- Permanent grassland
- Access tracks
- 1.5— Existing contours

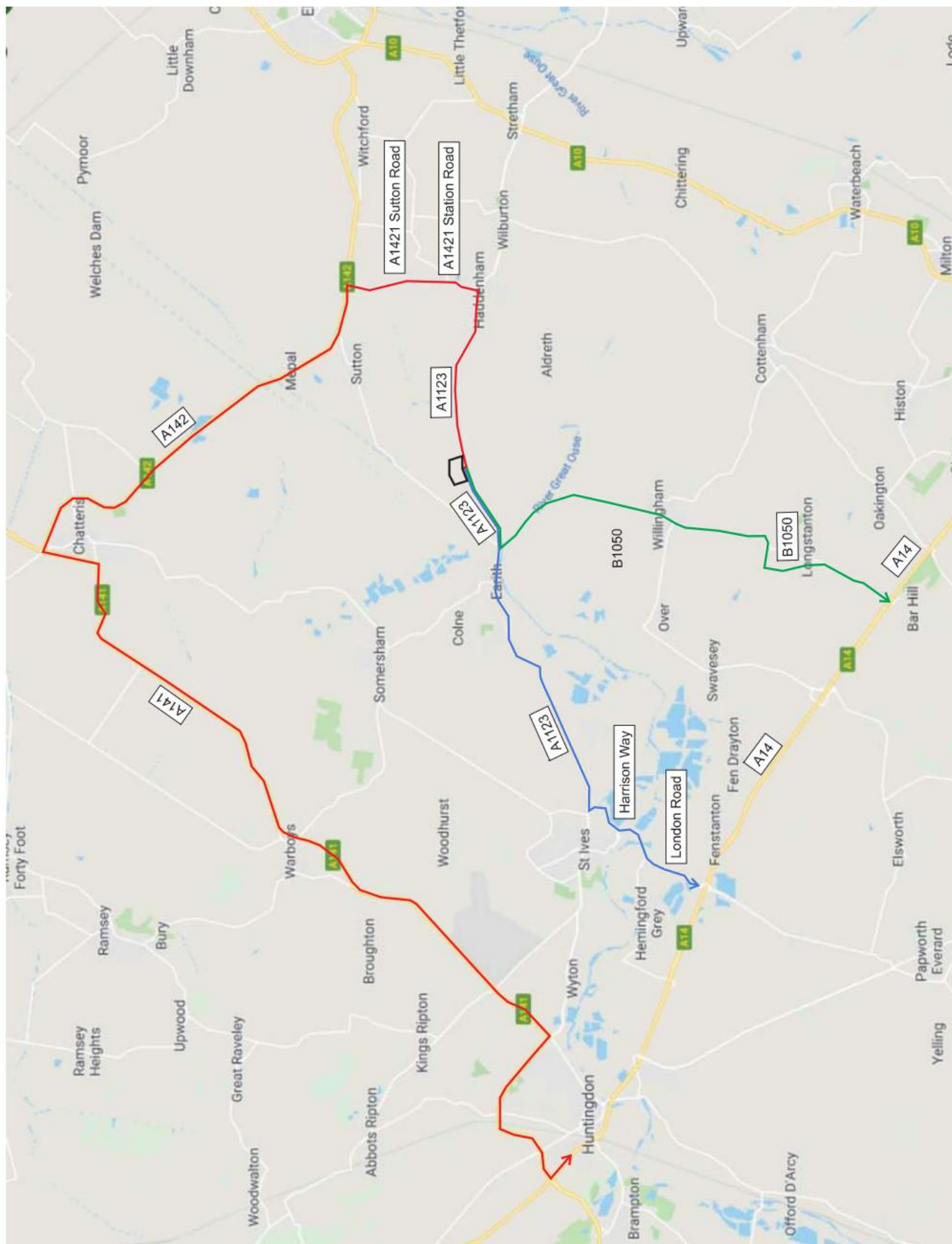
Rev. B	20/03/20	Amended the reservoirs.
Rev. A	04/06/19	Amended the reservoirs.

Scale:	1:5,000 @ A3
Date:	17/04/2018
Plan Ref:	03-18-B-WHF

WILLOW HALL FARM,
HADDENHAM

RESERVOIR DESIGN





Notes:

David Tucker Associates
 Transport Planning Consultancy
 Forester House, Doctors Lane, Henley-in-Arden
 Warwickshire, B95 3AV
 Tel: +44(0) 1564 793598 Fax: +44(0) 1564 793983
www.dta-transport.co.uk

Route 1 Route 2 Route 3

Figure 01
 Drawing Title
 Job Title
 Client

Proposed Vehicle Routes
 Dennis Farm, Haddenham
 Dennis Haddenham

Scale : NTS



© Crown Copyright and Database Right 2010 - AL 1000304 12

Application for a proposed Travel Hub, to include car parking, cycle, coach, and horse parking, travel hub building, photovoltaic panels, substation, lighting; significant infrastructure improvements to include road widening of the A10 along Cambridge Road, Hauxton Road and M11 Junction 11 north bound slip road, and a new dedicated busway to include strengthening of existing agricultural bridge; provision for a new Shared Use Path, including new bridge across the M11; with associated drainage, landscaping (including reconfiguration of bunds), biodiversity enhancement areas and infrastructure.

At: Land to the north/north-west of Hauxton Road (A10), to the north-west and north of Junction 11 of the M11 and to the west of Cambridge Road (A10) CB22 5HT (within the parish of Hauxton and partly within the parish of South Trimpington).

Applicant: Cambridgeshire County Council

Application Number: CCC/20/040/FUL

To: Planning Committee

Date: 29 July 2021

From: Assistant Director, Planning, Growth & Environment

Electoral division(s): Sawston & Shelford and Trimpington

Purpose: To consider the above planning application

Recommendation: That subject to the matter being referred to the Secretary of State for further consideration and the application not being called in, permission is granted subject to the conditions set out in paragraph 11.1

Officer contact:

Name: Dallas Owen

Post: Development Management Officer (Strategic and Specialist)

Email: [Email address for Dallas Owen](#)

Tel: 01223 714722

1. Introduction / Background

- 1.1 This scheme is one of the key strategic projects that has been identified by the Greater Cambridge Partnership (GCP) as part of the Government's City Deal funding. This scheme has been designed to ease congestion into the City of Cambridge and reduce journey times and the number of cars travelling into both Cambridge city centre and to the Cambridge Biomedical Campus. As set out in the applicant's submitted Planning Statement, the objective of the proposed Travel Hub is to ease pressure on the existing Trumpington Park & Ride facility and reduce traffic flow through the M11 Junction 11. The Travel Hub is therefore proposed to be complementary to the existing Trumpington Park & Ride facility, and the applicant has confirmed that it is not designed as a replacement facility to the current site. Cambridgeshire County Council will be responsible for the delivery of this project, which means that this proposal will be considered under Regulation 3 of the Town and Country Planning General Regulations 1992, as an application for planning permission by an interested planning authority for the development of land for transport purposes, where the authority intends to develop the land themselves.
- 1.2 This proposal has been brought forward by the applicant as one of a number of projects to complement and progress additional transport infrastructure in the GCP area. This proposal has been developed alongside some of the wider schemes set out in the Cambridgeshire and Peterborough Combined Authority's (CPCA's) Local Transport Plan (LTP) published in February 2020 and the Greater Cambridgeshire Partnership Schemes through the City Deal funding. The CPCA's LTP identifies the many transport challenges within the area and the need to invest in improved infrastructure; which identifies the potential for additional park and ride capacity in this area (see Figure 3.2 in the LTP), whilst also providing opportunities for more walking and cycling. The proposals have been designed by the applicant in the knowledge of future transport developments being progressed such as East-West Rail, Cambridge Autonomous Metro (CAM), a new Cambridge South Railway Station to serve the Cambridge Biomedical Campus, proposed busways, and planned greenways in the local area; and has therefore been brought forward to assist with the modal shift aspirations in this area, whether such schemes come forward or not.
- 1.3 As the proposal is for development which does not accord with the provisions of the adopted development plan (South Cambridgeshire Local Plan (2018) and Cambridge City Council Local Plan (2018)), the Secretary of State has been notified on the basis that it is a departure from the development plan. This means that the Secretary of State has the opportunity to "call in" the proposal to assess the recommendation of the Planning Committee once made.

2. The Site and Surroundings

- 2.1 The largest part of the Scheme comprises the proposed Travel Hub. The main Travel Hub site, which contains the car parking area and associated building, solar panels and landscaping (hereafter referred to as the 'Travel Hub' site), is located on the west side of the M11 in the parish of Hauxton. However, the total red line area encompassing the whole Scheme area, as shown in Agenda Plan 1, spans both sides of the M11 (including the A10 approach on either side of the M11 junction 11 and north bound off-slip from the M11) to allow road widening works along the A10 and M11 northbound slip road, inclusion of an internal access route across the M11 for a dedicated busway public transport route with strengthening works to the existing agricultural bridge (also known as the 'accommodation bridge', a new bridge across the M11 for non-motorised users (NMUs), associated

landscaping, and a drainage outfall connection route to the River Cam (discussed in more detail in section 3 of this report below). The total red line area extends to approximately 46.65 hectares (approximately 115.3 acres) to take account of all the associated works and highway routes and upgrades proposed as part of this planning application, of which the Travel Hub site itself equates to approximately 29.5 hectares (approximately 73 acres).

2.2 The application red line area is situated mainly within South Cambridgeshire, with the dedicated public transport route falling into Cambridge City Council's administrative area. This results in the application red line area covering the parishes of Hauxton (to the west of the M11) and South Trumpington (to the east of the M11), or within land associated with the city of Cambridge which is non-parished. The main Travel Hub site is located entirely within the Parish of Hauxton; with the highway improvements, dedicated public transport route and drainage outfall connection route falling between the Parish of South Trumpington or in non-parished areas within the city of Cambridge. The proposed Travel Hub site comprises three agricultural fields (used for arable production), with no buildings or visible structures contained within them. The Travel Hub site is enclosed to the north western boundary by an existing cycleway, to the north east by junction 11 of the M11, to the south east by Cambridge Road (A10), and to the south west by arable fields. Beyond the farm track to the west is the River Cam.

2.3 In terms of planning constraints, the Travel Hub site is located within the Cambridge Green Belt; is within the Lords Bridge Radio Telescope Consultation Area (Area 1); and is in a Civil Aviation Safeguarding Zone for Cambridge Airport for buildings, structures or work over 90 metres (295.3 feet) in height and for the Imperial War Museum at Duxford for buildings, structures or work over 45 metres (147.6 feet) in height. The Travel Hub site just falls outside the sand and gravel mineral safeguarded area defined by the Cambridgeshire and Peterborough Minerals and Waste Development Plan Document, but is adjacent to this planning constraint, with the drainage connection to the River Cam just entering into the safeguarded area. In respect of heritage constraints, there is an existing grade II listed milestone located adjacent to the Travel Hub NMU access site boundary, to the north of Hauxton Road (Hauxton Mill Bridge: List entry ref: 1127840), and a further grade II listed milestone located adjacent to the red line area on the public transport route towards the existing Trumpington Park and Ride site (Milestone about half a mile south of the junction with Shelford Road, Hauxton Road: List entry ref: 1226190). There are no other heritage assets located within or immediately adjacent to the Travel Hub site and wider red line area. However, there are three scheduled monuments, two conservation areas and a further ten listed buildings / structures within approximately 1 kilometre (approximately 0.62 miles) of the proposed Travel Hub site, the nearest of which is the grade II listed Hauxton Watermill (List entry ref: 1127839) approximately 150 metres (approximately 164 yards) to the south (taken from the Travel Hub NMU access site boundary adjacent to the A10). The Scheduled Monuments within close proximity to the Travel Hub site are as follows (with the wider heritage constraints evident in Agenda Plan 2):

- Romano-British settlement site south west of Trumpington – approximately 460 metres (approximately 503 yards) north of the Travel Hub site;
- Settlement complex north of Hauxton – approximately 700 metres (approximately 766 yards) south east of the Travel Hub site; and
- Settlement complex north east of Haslingfield – approximately 830 metres (908 yards) north west of the Travel Hub site.

2.4 The Travel Hub site is predominantly located within Flood Zone 1 and is therefore considered to be at a low risk from flooding. Only the far south-west corner of the Travel

Hub site is situated within Flood Zones 2 and 3.

- 2.5 The M11 motorway is located predominantly to the north of the Travel Hub site, with Junction 11 of the M11 to the north-east. Cambridge Road (A10) forms the south-eastern boundary to the site and there is an existing cycleway along the north western boundary that crosses the M11 and continues into Cambridge. To the west of the Travel Hub site are three Coprolite Ponds forming part of the Trumpington Meadows Country Park and nature reserve site. The country park and nature reserve share its boundary with the application site. Cambridge City Centre is situated approximately 5.2 kilometres (approximately 3.23 miles) to the north east of the Travel Hub site. The main vehicular access to the proposed Travel hub site is proposed from the A10, with the internal access road for the dedicated busway public transport route crossing the M11 towards the existing Trumpington Park and Ride site on Hauxton Road. The existing Trumpington Park and Ride site is located approximately 0.82 kilometres (approximately 0.5 miles) to the north-east of the proposed Travel Hub site. This facility has recently been expanded, with work completed in March 2020 to provide a total of 1,614 parking spaces. The existing Trumpington Park and Ride site to the north east is proposed to be run alongside the proposed new Travel Hub site.
- 2.6 The closest dwellings to the Travel Hub site are approximately 150 metres (approximately 164 yards) to the south (taken from the Travel Hub NMU access site boundary adjacent to the A10), which are located across the A10 at Hauxton Mill, which includes a range of new dwellings accessed from St Edmunds Way. The closest dwellings to the public transport route to the east of the M11 are the new dwellings currently being constructed at Trumpington Meadows which are approximately 408 metres (approximately 446 yards) away (approximately 712 metres (approximately 778 yards) from the centre of the Travel Hub site). Furthermore, the closest dwellings to the existing park and ride slip road that is proposed to be widened as part of this proposal, are the existing dwellings on the corner of Addenbrookes Access Road which are approximately 99.1 metres (approximately 108.4 Yards) away from the centre of the Travel Hub site).
- 2.7 The existing Trumpington Park and Ride site is within the ownership of Cambridgeshire County Council and has been identified in the blue line area for the purposes of this planning application, to demonstrate that it is land in control of the applicant. Further afield highway ownership of the guided busway route and county farms land adjacent to the Addenbrookes Access Road is also identified.

3. The Proposed Development

- 3.1 The application seeks full planning permission for a Travel hub site and associated infrastructure comprising the following:
- 2,150 car parking spaces inclusive of 108 Blue-Badge bays and 108 Electric Vehicle (EV) charging bays.
 - Designated drop off bays with capacity for circa 9 vehicles at any one time.
 - Bus interchange comprising 6 bus stops with covered waiting facilities for passengers.
 - 12 private coach spaces.
 - Initial provision for 326 cycle parking spaces comprising 160 covered Sheffield cycle stands, 16 covered 'M' stands for non-standard cycles, and 150 cycle parking lockers.
 - Equestrian parking area with attached horse corral.
 - A new 5 metre (5.47 yards) wide shared use path for non-motorised users (NMUs) with 0.5 metre (0.55 yards) grass verge for pedestrian, cyclists and equestrians.

- A new shared use NMU bridge over the M11 for pedestrian, cyclists and equestrians.
- A new site access from the A10 and local widening of the A10.
- A new off-line Public Transport route between the Travel Hub site and the A10 Hauxton Road / Addenbrooke's Road junction.
- Single storey building on the Travel Hub site with provisions including toilets, a help point, information displays, a cleaner's cupboard, an office and a kitchen, with a proposed footprint of 13.95 metres (45.7 feet) by 9.4 metres (30.83 feet) and 4 metres (13.12 feet) lowering to 3.13 metres (10.27 feet) in height.
- Lighting of the whole site for safety and security purposes, including low level lighting provided along the NMU route; and 8 metres (26.25 feet) high lighting columns within the Travel Hub site.
- Photovoltaic Panels over a third of the parking area of the site, with infrastructure to allow further additions in the future if required subject to the necessary planning permission consent.
- Provision for a Sub Station.
- Means of enclosure, to include Post and Three Rail Fencing, Post and Wire Fencing, and Stock Proof Fencing.
- Widening of A10 carriageway to create additional lanes and provision for road infrastructure.
- Widening of the M11 gyratory on the north bound western slip road.
- New access to the Country Park and nature reserve for the Wildlife Trust.

3.2 A soft landscaping strategy is proposed and ecological mitigation and enhancements which includes: native hedgerow and tree planting; and wildflower planting. Approximately 23 m of the existing mature hedgerow which crosses the Travel Hub site will be removed. In addition, approximately 500m of the hedgerow along the A10 will be removed to accommodate the widening of the road either side of the entrance to the Travel Hub. This hedgerow comprises newly established and newly planted hedgerow, described in the ecology chapter of the ES as species-poor hedgerows with some poorly established sections as a result of brown tail moth caterpillar damage. As part of the proposed landscape strategy for the site, approximately 1800m of new native species hedgerow will be planted as part of the CSWTH Scheme and a new woodland belt of native species along the A10 and A10/M11 boundary (minimum of 20m wide). The new hedgerow is shown on the planting proposals drawings 413752-MMD-LAN-XX-DR-LV-0001-0011. The species mix is as follows:

Species	Specification	Percentage mix (%)
<i>Cornus sanguinea</i> (common dogwood)	1+1: Branched:3 brks:BR:80-100cm	10
<i>Corylus avellana</i> (hazel)	1+1: Branched:3 brks: BR: 80-100cm	15
<i>Crataegus monogyna</i> (common hawthorn)	1+2: Transplant:3 brks: 80-100cm	40
<i>Ilex aquifolium</i> (holly)	1+2 5 brks:C:60-80cm	5
<i>Prunus spinosa</i> (blackthorn)	1+1: Branched:3 brks: BR: 80-100cm	20
<i>Rosa canina</i> (dog rose)	1+1: Branched:3 brks: BR: 80-100cm	10

3.3 A tree survey has also been submitted with the application that identifies there are no category A trees on the site, which are trees of high quality.

3.4 In addition to items listed in paragraph 3.1, hard landscaping is proposed to include; height restriction barriers along the proposed shared use NMU; tactile paving at crossing points; 3 metre (9.84 feet) high bus waiting shelters; permeable block paving within the parking bays;

blocked paved footway around the bus loop; pedestrian guardrail; deterrent paving; traffic lights; lockable bus barriers; electronically controlled gates; road signs within the Travel hub site and existing highway network; and picnic benches. (Agenda Plan 3).

4. Planning History

4.1 The proposed Travel Hub site is located on 3 farmed arable fields, that do not have any relevant planning history for consideration.

4.2 Wider developments at Trumpington Meadows, including the Trumpington Meadows Country Park, and improvements to the existing Trumpington Park and Ride site are relevant to the wider context of this development, including the need for any recommended planning conditions to work together, so these have been listed below for wider context purposes, which should be taken to include the associated condition and non-material amendment approvals:

- S/0654/00/CC & C/0315/00/CC – 1,500 Space Park and Ride Car Park, Erection of a One Storey Amenity Building, Creation of 2 New Vehicular Accesses and a Bus Only Access (Approved June 2001).
- S/1121/02/CC & C/0550/02/CC – Variation of Condition 21 of Planning permissions S/0654/00/CC & C/0315/00/CC to extend the use of the Park and Ride to include Sundays to operate between the hours of 0900 to 1900 (Approved September 2002).
- S/0054/08/O & 08/0048/OUT – Demolition of existing buildings and structure and Redevelopment for Approximately 600 dwellings. Land for a Primary School, Recreation / Leisure Uses including Change of Use from Agricultural to Public Open Space, Community and Other Local Facilities with Associated Parking, Infrastructure and Earthworks (Approved October 2009).
- S/1616/10 Formation of an Earth Bund adjacent to M11 (Discharge of Condition number 50 attached to S/0054/08/O), (Approved November 2010).
- S/2043/12/NM Amended details for formation of M11 Earth Bund (Condition 50 of S/1616/DC) of outline consent S/0054/08/O. (Approved January 2013).
- S/1323/15/DC Discharge of Condition 50 Earth Bund for S/0054/08/O for land to the North / East of the M11 Motorway West of Junction 11 (Approved July 2015).
- S/0107/16/RM Reserved matters for Phase 9 including 122 dwellings with associated internal roads, car parking, landscaping, amenity and public open space pursuant to outline planning approvals S/0054/08/O and 08/0048/OUT (Approved April 2016).
- S/0472/16/RM Reserved Matters application for final southern section of primary road and associated infrastructure pursuant to outline planning approval S/0054/08/O (Approved May 2016).
- S/2501/16/DC Discharge of Condition 50 (parts e and g – earth bund) of outline planning consent S/0054/08/O (Approved May 2016).
- S/2646/16/RM Reserved Matters for Phases 10 and 11 including 392 new dwellings (including 40% affordable housing) with associated internal roads, car and cycle parking, landscaping and open space pursuant to outline planning approval S/0054/08/O (Approved March 2017).
- C/5001/18/CC - Continued operation of existing Park and Ride Site on 24hr basis together with a proposed extension to accommodate 274 additional car parking spaces (including disabled parking bays); additional bus and coach stops and layout area; reconfiguration of existing car parking and the site entrance; provision of pedestrian and cycle links to Trumpington Meadows and replacement/new undercover cycle parking with associated infrastructure and landscaping (Approved November 2018).

5. Publicity and pre-application consultation

- 5.1 This proposal is an application for major development which does not accord with the provisions of the development plan. It has been publicised in accordance with Article 15 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. The application was advertised by means of a notice in the Cambridge News on 7 July 2020. The Regulation 25 information required under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 was advertised in the Cambridge News on 4 January 2021. Both advertisements advertised the proposals as EIA development which would affect a public right of way, be development that affects the setting of a listed building and were proposals that did not accord with the provisions of the development plan (which are therefore considered to be a departure).
- 5.2 Five site notices were erected around the red line area on 2 July 2020 that advertised the proposals as EIA development which would affect a public right of way, be development that affects the setting of a listed building and were proposals that did not accord with the provisions of the development plan (which are therefore considered to be a departure). Site notice 1 was located at the main Trumpington Park & Ride Entrance; site notice 2 was located opposite the Addenbrookes access road junction; site notice 3 was located at the northern part of the Travel Hub site by the layby ahead of the M11 junction 11 roundabout; site notice 4 was located on the main frontage of the proposed site; and site notice 5 was located opposite the new Hauxton housing development that is accessed from Edmunds Way. Occupiers of properties adjacent to the red line area were notified by letter on 26 June 2020. The Secretary of State was also notified of the proposed development as it is located in the Cambridge Green Belt and will therefore be a departure from the development plan.
- 5.3 Following the submission of additional environmental information requested under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, site notices were erected around the red line area on 22 December 2020 in the same locations as the original July 2020 site notices. Occupiers of the same properties adjacent to the red line area were also notified by letter of the Regulation 25 consultation on 21 December 2020.
- 5.4 The adopted Cambridgeshire County Council Statement of Community Involvement (January 2019) sets out that at pre-application stage applicants are encouraged to undertake pre-application discussions. Proposals are defined as either being 'Category A' developments requiring a high level of community involvement, or 'Category B' developments requiring a standard level of community involvement. Category A developments are defined as being applications with significant environmental effects or developments that are contrary to the development plan. The proposed application falls within a 'Category A' high level of community involvement as it is a proposal for a major infrastructure project within the Green Belt. The submitted Statement of Community Involvement produced by the applicant is dated April 2020.
- 5.5 Consultation by the applicant as part of the pre-application process included meetings with officers from Cambridgeshire County Council and Greater Cambridge Shared Planning Service; the scheme was presented to the Joint Development Control Committee in July and December 2019; with a review undertaken by the Design Quality Panel in July 2019. Three public exhibition events were also held by the applicant in Autumn 2019 to inform the final submission proposals.

6. Consultation responses

- 6.1 The following paragraphs set out a summary of the consultation responses received, starting with confirmation of the final position after both rounds of public consultation, before setting out (where appropriate) the history of responses including any holding objections or concerns raised. The full responses are published on the Council's website. For ease of reference this section has been grouped as far as possible to link the responses into subject areas and/or the body providing them.
- 6.2 Greater Cambridge Shared Planning (GCSP) covering both South Cambridgeshire and Cambridge City Administrative Areas – Planning Officer: **No objection** subject to planning conditions. The GCSP planning responses received took account of the specialist consultee comments sought on Landscaping; Ecology; Environmental Health; Heritage; Sustainability; Air Quality and Contaminated land, which are set out separately within this officer report. Initially, GCSP planners confirmed that whilst they supported the principle of development, they found that additional information was required in respect of ecology and landscaping (including impact on the Cambridge Green Belt); which led them to place a holding objection on the application whilst emphasising that they were committed to working with county planners and the applicant to resolve the outstanding matters highlighted in their response. Following receipt of the Regulation 25 additional EIA information, the GCSP planners confirmed the Shared Service had considered the application and could confirm that there are no objections to the proposed development subject to a number of technical conditions listed in their response. This led to the removal of their holding objection and confirmation that they had no objection subject to the imposition of recommended planning conditions.
- 6.3 Greater Cambridge Shared Planning – Landscape: **No objection; whilst acknowledging the findings as reported in Chapter 10 and the Addendum do not mean that the development is acceptable or indeed unacceptable when considered against the relevant policies in the South Cambridgeshire Local Plan, which will be a matter for the overall planning balance.** Originally, in the absence of any assessment of the effect of the scheme on the Cambridge Green Belt openness and coordinated information and clarity regarding the extent and impact of the proposed earthworks and vegetation clearance, the GCSP landscape consultant confirmed that they were unable to fully determine the level of landscape and visual impact on the scheme, nor fully understand the design quality of the proposals. As such, whilst they acknowledged that some of these issues could be addressed by condition in the event that permission was granted, the lack of adequate Green Belt assessment was seen to be fundamental to understanding the impact of the scheme and conflicts with policy NH/8 (Mitigating the Impact of Development in and adjoining the Green Belt). Consequently, they originally objected to the proposals on the basis of their conflict with NH/2 and failing to demonstrate meeting policy NH/8 (until further coordinated information and assessment had been submitted).
- 6.4 On receipt of the updated and additional information issued by the applicant's Agent, the GCSP landscape consultant provided comments that led them to withdraw their original objection, whilst leaving the harm against the relevant policies in the South Cambridgeshire Local Plan to the overall planning balance. The GCSP landscape consultant acknowledged that the proposed creation of 1 metre high bunds and raising of levels by 300mm across proposed soft landscape areas is acceptable as an overall principle. However, they raised a number of comments relating to the suitability of using the topsoil in areas of species-rich

grassland and requested further detail and specification is required by condition should permission be granted. They confirmed that they continue to raise a design issue with the layout of part of the shared user path and the adjoining access road that unfortunately results in a lack of meaningful landscape treatment and poor amenity for users of the path where they pass through the main part of the travel hub site.

- 6.5 The GCSP landscape consultant acknowledged that the proposed Travel Hub is recognised as an important development proposal that has followed a structured site-selection and appraisal process and incorporates many positive Green Infrastructure and landscape design approaches that could deliver enhancement of some areas. Nevertheless, they are of the opinion that it is a proposal that would potentially be harmful to the local landscape character and visual amenity, including impacting upon the purposes and visual openness of the Green Belt. The identified harms should therefore be accordingly weighted in the planning balance. In the GCSP landscape consultants opinion, the proposal would give rise to a range of adverse landscape and visual effects that whilst on the whole could be mitigated, would also result in some residual effects on visual amenity to users of the local cycle route facilities. The Environmental Statement (ES) acknowledges that there would be adverse landscape and visual effects and that some would be residual, but considers that for the most part, these would be minor and ranked as being not significant in Environmental Impact Assessment (EIA) terms by Year 15. The GCSP landscape consultant confirmed that they did not take a fundamentally different position to that of the applicant in this regard.
- 6.6 The GCSP landscape consultant noted that the ES and Chapter 10 Addendum confirms that there would be adverse landscape and visual effects, albeit these are ranked in the ES as being not significant in EIA terms. However, the Policy NH/2 does not refer to significant harm, rather it is a test of new development needing to respect and retain or enhance the local character and distinctiveness of the local landscape and of the individual National Character Area in which it is located. The range of adverse impacts concluded in the ES Chapter 10 Addendum (LVIA) would suggest that the proposed development does not fully meet Policy NH/2. The landscape proposals and commitment to long-term management secured via a Landscape and Ecological Management Plan, might be capable of offsetting some of the harm that would arise from the proposal, albeit the function, landscape character and appearance of this part of the local landscape would be markedly altered.
- 6.7 In conclusion, the GCSP landscape consultant accepted that whilst in Green Belt terms, the proposed development is considered to be 'not inappropriate' development by the applicant, the proposal is also considered to cause a degree of harm to the openness and purposes of the Green Belt such that the proposal conflicts with NPPF (2021) and Policy NH/8. As such, in the GCSP landscape consultant's view, the findings as reported in Chapter 10 and the Addendum do not mean that the development is acceptable or indeed unacceptable when considered against the relevant policies in the South Cambridgeshire Local Plan, and as such this must be a matter for consideration by South Cambridgeshire District Council (SCDC) and Cambridgeshire County Council (CCC) as part of the overall planning balance.
- 6.8 SCDC Environmental Health Officer (EHO) – **No objection subject to the imposition of the recommended planning conditions.** Whilst the EHO had no objections in principle to the proposals, he did acknowledge that the construction phase of the development will ultimately produce noise and dust which has the potential to adversely affect the nearest residential properties if not effectively mitigated. He also confirmed that he had studied the supporting information related to the intended artificial lighting and also noted that

Photovoltaic panels are proposed, with the latter mentioned by Trumpington Resident's Association as a potential source of glare which could impact on residents of Trumpington Meadows and Glebe Farm areas. The EHO therefore requested that appropriate conditions be imposed to ensure that noise and dust during the construction phase, and artificial lighting (including glare from the Photovoltaic panels) is suitably controlled; whilst noting that the EHO's comments on lighting only consider the effects of artificial lighting on humans such as residential receptors, and do not consider the impact on other environments such as businesses, other interested organisations such as Astronomy Organisations (sky glow), ecology (wildlife / animal behaviour), drivers on the public highway, landscape or secured by design requirements which are considered by other specialists in those areas.

- 6.9 The EHO also raised a number of issues that required clarification and suitable controls be put in place through the use of planning conditions. The following environmental health issues / health determinants need to be considered and effectively controlled in order to protect the quality of life / amenity and health of proposed and existing residential uses / premises and the wider community / environment and which are paramount in facilitating a sustainable high quality development:
- Noise / Vibration (including construction phase impacts of noise, vibration and dust; noise assessment; and off-site traffic noise impact on local roads through a Construction Environmental Management Plan);
 - Air Quality;
 - Artificial Lighting;
 - Contaminated Land;
 - Surface Water Drainage;
 - Renewable Energy Strategy / Report; and
 - General Informatives.
- 6.10 Greater Cambridge Shared Planning – Heritage: **No objection, subject to safeguarding of the two Grade II listed milestones.** The Historic Environment Officer confirmed that they were not commenting on archaeological aspects of the historic landscape as these have been dealt with by Historic England (HE) and County Archaeology responses to the consultation. They also noted that Historic England had also commented regarding the grade I Listed churches at Hauxton and Trumpington. Regarding potential impact of the proposals on the setting of Cambridge City, the Historic Environment Officer confirmed clearly the site's parking area location being beyond the M11 and south of Trumpington's historic core of settlement, is sufficiently distant from the Cambridge historic core that given the nature of development proposed on the application site, there is no visual impact on the historic core. In terms of the wider setting of the city, the proposed travel hub will result in a change to the landscape character from the loss of farmland. However, this area of farmland concerned is not known to make a particular contribution to the setting of the city in heritage terms (notwithstanding archaeology) and the development is likely to be perceived as part of the M11 infrastructure. The Historic Environment Officer noted that importantly, the proposals do not include surfacing or structures on the more immediate river corridor land to the west of the main site area.
- 6.11 The Historic Environment Officer confirmed that the designated heritage Listed buildings of Hauxton Mill are nearby to the south. Although there would obviously be a substantial increase in vehicle activity in the vicinity, the immediate environs of the mill are largely protected by woodland and the site proposals being across the A10 to its North do not harm

its setting in their opinion. Safeguarding of the two grade II Listed milestones are important that these are not harmed as part of approval of the scheme. Subject to these comments the Historic Environment Officer did not raise any objection to the scheme on heritage grounds.

- 6.12 Greater Cambridge Shared Planning - Sustainability: – **No objection as the proposed scheme is supported in sustainable construction terms.** From a sustainability perspective, the proposals are supported by the Principal Sustainability Consultant, and the consideration of climate change within the Environmental Statement is welcomed. The scheme itself is intended to facilitate the increased use of sustainable modes of transport, which is also welcomed. Provision has been made for electric vehicle charging, with 108 bays for EV chargepoints provided for initially, with the remainder of the spaces being provided with ducting allowing for 100% provision in the future. PV panels, provided on solar canopies on the north car park, are predicted to meet 31% of the sites forecasted energy requirements, saving 23 tonnes of carbon. This approach is supported.
- 6.13 The Principal Sustainability Consultant also noted that toilet provision will be made as part of the Travel Hub building being provided on site. As water use will be relatively low, she did not consider it necessary for water use to be conditioned for this proposal. However, she did recommend that water efficient sanitary ware be specified for the toilets in line with Part G of the Building Regulations. Furthermore, she noted that a Glint and Glare Assessment had been provided by the applicant which concludes that no overall impact is expected as long as proposed landscaping is maintained at an adequate height (same or higher than the height of the solar carport); albeit she acknowledged that reference to aviation activity at Cambridge Airport may need to be required in response to the representations from Cambridge Airport.
- 6.14 Greater Cambridge Shared Planning - Air Quality: **No objection.** The Scientific Officer – Air Quality acknowledged that the proposed development is a transport infrastructure aiming to reduce the impact of traffic on the area and therefore has an associated effect of reducing emissions and improving air quality by encouraging a modal shift from private car journeys to more sustainable modes of transport between the south west of Cambridge and the city centre. Whilst the Scientific Officer for Air Quality does not object to the proposed development, they emphasised the need to be placed to ensure careful consideration, support and delivery of the proposed Low Emission Strategy to reduce the emissions associated with the proposed site. Chapter 9 of the Transport Assessment outlines the low-emission strategy for CSWTH to show how the Travel Hub can further contribute to sustainable journeys to/from Cambridge. Therefore, the Scientific Officer – Air Quality recommended that if planning permission is granted planning conditions should be added to implement the Low Emission Strategy measures proposed and requirements for a Construction Phase Dust Impact Management Plan to be submitted and agreed.
- 6.15 Greater Cambridge Shared Planning - Contaminated Land: **No objection.** The Scientific Officer – Contaminated Land confirmed that the only immediately evident environmental constraints that would attract a contaminated land condition was the presence of occasional areas of infilled land, associated with a history of coprolite mining within this area, immediately to the north west of the proposed development. However, she acknowledged that the proposed development is not particularly sensitive to the presence of contamination and therefore she recommended an informative be attached to any grant of consent to cover the eventuality of any unforeseen contamination. The Scientific Officer – Contaminated Land also acknowledged that the proposals would entail significant movement of material to facilitate the required earthworks. However, she noted the

recommendation for a condition requiring a Construction Environmental Management Plan (CEMP) by the EHO, where Part H of the proposed condition addresses the setting out of 'Measures for soil handling and management including soil that is potentially contaminated'. As such, no objection was raised.

- 6.16 Greater Cambridge Shared Planning – Ecology: **No objection subject to conditions.** The Ecologist acknowledged that the applicant had provided a response regarding biodiversity net gain which was welcomed. The response had given details of how the applicant intends to reach the desired condition within the time frame they have set out. The procedures they have set out do have the potential to provide the desired condition; however he would recommend that a monitoring programme for habitat creation and management is conditioned and reports submitted to relevant bodies at 2, 5, 10, 15, 20, and 25 years post creation. Remedial actions should be required if conditions have not been reached within predicted timeframes.
- 6.17 The Ecologist is satisfied that issues regarding biodiversity net gain have been dealt with. Regarding increased visitor pressure, no further information has been received. He would therefore suggest that a monitoring programme of visitor numbers is conditioned and should visitor numbers significantly increase from baseline, a review of mitigation is triggered and remedial actions taken.
- 6.18 CCC Ecology – **No objection subject to planning conditions.** Originally objected to the proposed scheme until further details of the ecological assessment had been provided, in order to fully determine the level of impact of the proposals on biodiversity. This original objection was based on an incomplete ecological assessment; otter surveys; impact on Trumpington Meadows County Park; Highways scheme – mammal/otter passage; landscape scheme; drainage strategy; landscape and ecology management plan.
- 6.19 Upon receipt of additional ecological information to address the above concerns and the clarification letter provided by the applicant's Agent dated 24th February 2021 to clarify some of the points and objections raised to the submitted information, the Ecologist withdrew her holding objection subject to the imposition of planning conditions. In withdrawing her objection, she confirmed that she was satisfied that a measurable net gain in biodiversity value is possible as part of this scheme from her calculations, which would meet the necessary policy requirements. Nonetheless, she requested this biodiversity net gain was controlled through a suitable planning condition, that also secured the long-term management of the area. This was considered necessary, alongside the other landscape, biodiversity and ecology related conditions that were proposed in her original response.
- 6.20 Environment Agency – **No objection.** Confirmed they reviewed the submitted Flood Risk Assessment (FRA) prepared by Mott Macdonald, dated May 2020 with regard to fluvial flood risk and have no objection to the development on flood risk grounds. However, they noted that the proposed new outfall to the River Cam will fall under the terms of the Environmental Permitting Regulations (2016) and so a permit may be required from the Environment Agency for these works – to which they signposted the applicant to further information on their website to assist with this process.
- 6.21 Lead Local Flood Authority (LLFA) – **No objection subject to conditions.** They initially objected to the application for 7 reasons – namely concerns around the reduction of the coprolite pond and its impacts to the existing water system from the reduction; insufficient information to understand the maintenance access to drainage features, particularly taking account of the busway and a steep sloped mound; lack of detail for the pump overflow from

the coprolite ponds which could lead to wider impacts from the northern car parking area and public transport route, which required that the wider impacts must be demonstrated; the request for accurate data sets in FEH rainfall to ensure the hydraulic modelling is an accurate representation of the proposed network rather than the use of Flood Studies Report (FSR) rainfall data, which is now outdated; incorrect greenfield run-off rate calculations based on the whole site, including the public transport route and A10 widening scheme, rather than just the impermeable areas; insufficient demonstration that 5.0l/s is the minimum rate to avoid blockages; and further details required in relation to the M11 slip road drainage discharge point to demonstrate the impacts this may have on the receiving water body and controls in place to demonstrate where this outfalls and calculations to demonstrate there will be no downstream increased risk of flooding owing to the additional impermeable areas. They also requested 3 informatives on Water Quality, Ordinary Watercourse Consent, and Pollution Control. On the receipt of additional information to address these concerns the LLFA confirmed they were able to remove their objection to the proposed development subject to a condition securing a surface water drainage scheme, and two informatives on Ordinary Watercourse Consent and Pollution Control.

- 6.22 Natural England – **No objection.** Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites and as such does not object to the proposal. However, Natural England did note from the Planning Statement that the proposed development will result in the loss of circa 33 hectares of Best and Most Versatile (BMV) agricultural land. They acknowledged that in response to the EIA scoping consultation they considered that impacts to BMV should have been included in the Environmental Statement to show how it had been considered in light of the Government's policy for the protection of BMV agricultural land as set out in paragraph 170 [now 174] of the NPPF [subsequently noting that Cambridgeshire County Council planning officers did not scope it into the final EIA development, so this omission was not incorrect]. They noted that in terms of EIA, BMV land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC) system) is a receptor of very high or high sensitivity (depending on the ALC grades present) and loss of 20 hectares (or more) of BMV agricultural land that would typically give rise to a major (or very large / large) adverse impact (according to DMRB LA104/109 or EIA Handbook 3rd Edition significance methodologies) depending on the amount of the different ALC grades affected and any mitigating circumstances. As such whilst they initially advised that a detailed ALC field survey and an associated soil resource survey should be carried out, and the applicant should show how the BMV agricultural land circumstances and impacts on soil on the site are being considered and any adverse impacts minimised, in line with the NPPF and planning practice guidance, DEFRA Construction Code advice and local plan policies; in understanding that it was not scoped into the EIA by CCC planning officers they confirmed that it would be for the Local Planning Authority to ensure it had the necessary information for decision making.
- 6.23 In providing their responses, Natural England also confirmed that they are generally supportive of the biodiversity mitigation and enhancement proposals detailed in the Landscape and Ecological Management Plan and advised that delivery of the proposed measures should be secured through appropriate planning conditions. Further general advice on the consideration of protected species and other natural environment issues was provided in a separate annex provided (Annex A). The Annex A information provided confirmation that Local Planning Authorities are responsible for ensuring that they have sufficient detailed agricultural land classification information to apply NPPF policies (paragraphs 170 and 171 [now 174 and 175]) and signposted where this information could be sourced and guidance on soil protection. Annex A also confirmed that Natural England

encourages any proposal to incorporate measures to help improve people's access to the natural environment, which includes measures such as reinstating existing footpaths and bridleways and links to other green networks. Furthermore, their guidance encourages opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175 [now paragraphs 8, 73, 104, 120, 174, 175, 179 and 180]) and advises a mitigation hierarchy as set out in NPPF paragraph 175 [now 180]. Natural England confirmed they would be happy to comment further should the need arise but reiterated that they had no objection to the proposal.

- 6.24 CCC Historic Environment Team (Archaeology): **No objection subject to a planning condition.** The Historic Environment Team (HET) acknowledged that a field archaeological evaluation took place in August 2019, finding occupation evidence of Iron Age date (circa 6th – 4th century BC) and a small Anglo-Saxon cemetery of 6th – 7th century AD. Subsequent discussions with archaeological consultants from Mott MacDonald have helped to refine a mitigation scheme, details for which will be required in advance of any development in this area. The HET do not object to this development but recommend that the mitigation strategy is secured by the use of an appropriate planning condition shown on any planning consent that may be granted.
- 6.25 Historic England – **No objection to the application on heritage grounds.** Historic England acknowledged that the site is situated midway between three scheduled monuments (Noted in the Environmental Statement as MM001, MM002 and MM003) and close to a number of other important heritage assets including the Grade I listed church of St Edmund as Hauxton (MM004) and the Grade I listed Church of St Mary and St Michael at Trumpington. They noted the Environmental Statement (ES) and the underpinning Desk Based Assessment (DBA) have assessed these assets and agreed that the weighting given was appropriate. The churches have high heritage values and the scheduled monument form an important group of designated buried archaeological remains. They also noted the impact upon the Church in Trumpington was included in the assessment following their previous advice and that further discussion was undertaken with regards to the safeguarding of the two grade II milestones. Overall, they noted the results of the impact assessment in relation to the designated heritage assets and did not wish to make any further comments in that regards. As such, they confirmed that Historic England does not object in principle to the scheme.
- 6.26 In addition to noting that they could not find any record of the consultation referenced in the ES. They confirmed that their one concern was that three designated assets (Scheduled Monuments) are evenly spaced around the area with the development roughly in the centre. In recent years the amount of development in the wider area has provided an unprecedented level of information about the historic landscape. They were very much of the view that there was clearly an important multi-period landscape in this area of which some discreet areas are designated, whilst much remains undesignated. As a landscape it needs to be considered more holistically and although mitigation by excavation and preservation by record is an appropriate response to the non-designated archaeological assets within the red line boundary they considered the ES lacks a broader level of understanding of the historic landscape. In dealing with assets only as individual sites does not establish the value of synthesis. They therefore confirmed that they would value further comment from the applicant as to how they plan to bring this matter to the fore, and how they will seek to balance the impact upon the heritage assets from the proposal. In particular, how they would seek to develop an understanding of the finding of the archaeological discoveries made as part of the work, linked to this wider archaeological landscape amongst the future users of the development.

- 6.27 On receipt of the Regulation 25 information, Historic England confirmed that they did not have any additional comments, and suggested that the officers continued to seek the views of specialist conservation and archaeological advisors, in particular with regards to the requirement for archaeological works and mitigation.
- 6.28 CCC Transport Assessment (TA) Team: **No objection subject to conditions.** Originally the TA Team objected to the application on the basis that there was insufficient information to properly determine the highway impact of the proposed development. However, upon receipt of additional information from the applicant's Agent, the TA Team confirmed that the proposed development was not anticipated to cause severe detriment to the capacity of the surrounding highway network and their holding objection was withdrawn subject to the inclusion of planning conditions in relation to the following:
- a detailed scheme for the implementation of the NMU route to be constructed between the A10 and the A1309 Hauxton Road, and the new NMU bridge to be constructed over the M11.
 - Ownership / Right of Way details of the new NMU route between the A10 and the A1309 Hauxton Road, in particular, the proposed section east of the new NMU bridge to the A1309 Hauxton Road.
 - the internal layout of the new Travel Hub site.
 - a scheme for the monitoring of cycle parking provision within the Travel Hub.
 - details of the bus and coach service provision, routes, and frequencies to serve the site.
 - a detailed scheme for the proposed signalled vehicular access junction off the A10 to the new Travel Hub site.
 - a detailed scheme for the proposed Public Transport Route between the new Travel Hub site and the A1309 Hauxton Road/Addenbrooke's Road signal junction, and improvement works to the existing accommodation bridge over the M11.
 - a detailed scheme for the off-site highway improvement works on the A10.
 - a detailed scheme for the off-site highway improvement works at the M11 Junction 11.
 - a detailed scheme for the off-site highway improvement works on the A1309 Hauxton Road.
 - a detailed scheme for the off-site highway improvement works at the A1309 Hauxton Road/Addenbrooke's Road signal junction.
- 6.29 CCC Highways Development Management: **No objection subject to conditions.** The Highways Development Management comments and conditions are set out in the TA Team response above.
- 6.30 Highways England: **No objection subject to planning conditions.** Highways England originally recommended that planning permission not be granted for a specified period (in line with Annex A – further assessment required). However, upon further information and discussions with the applicant they confirmed that they do not have any remaining objections subject to recommended planning conditions (in line with Annex A – Highways England recommended Planning Conditions). Highways England confirmed that they have worked closely with the applicant on the highway impacts of the proposed development and is content that the work undertaken is sufficient to understand the impact of the development on the Strategic Road Network. The proposals have been subject to extensive modelling which has enabled development of highway works to the M11 Junction which met

the required safety and design standards, sufficient to safeguard the performance of the highway in accordance with the requirements of the Highways Act 1980. Consequently Highways England confirmed they were able to remove their holding objection and recommended that conditions are appended to any consent before coming into beneficial use that will need to be completed to the satisfaction of the Local Planning Authority in consultation with the highway authorities. They confirmed that the design of the improvements shall be to the standards set out in the Design Manual for Roads and Bridges.

- 6.31 The recommended conditions put forward by Highways England included details for the (a) A1309 Hauxton Road Westbound approach to Junction 11 - Signalisation of the A1309 approach and corresponding carriageway; (b) M11 Northbound Offslip approach to Junction 11 - Widening of the approach to the nearside with three lanes at the stop line, with the third lane extending to approximately 80 metres in length. Revision to earthworks to accommodate widened carriageway; and (c) M11 Mainline north of Junction 11 - Provision of a new non-motorised user bridge over the M11 just north of the existing accommodation bridge. Revisions to existing accommodation bridge to provision for bus use and signalised shuttle working. An informative related to a Section 278 agreement was also requested.
- 6.32 Crime Prevention Design Team: **No objection.** The Designing Out Crime Officer confirmed that they had viewed the documents in relation to crime, disorder and the fear of crime in particular the drawing relating to CCTV that was submitted to address their original comments. They noted their previous comments and the addition of a plan covering CCTV which they confirmed would appear to be appropriate for this development. As mentioned previously they also acknowledged that it would appear that their early security recommendations had been implemented, so they did not object to the proposal.
- 6.33 Cambridge Airport Safeguarding: **No objection.** Cambridge Airport Safeguarding confirmed they have no objection to this proposal from an aerodrome safeguarding perspective as it does not conflict with their safeguarding criteria. They originally recommended three planning conditions – namely submission of a Bird Hazard Management Plan; Removal of permitted development (PD) rights for cranes and construction equipment; and PV Cells Glint and Glare. However, upon confirmation of further details supplied by the applicant's Agent, Cambridge Airport Safeguarding confirmed that these are no longer required.
- 6.34 Ministry of Defence (MOD) – **No objection.** The MOD confirmed that they do not have any safeguarding objections to this proposal.
- 6.35 Imperial War Museum, Duxford: **No objection.** The Imperial War Museum at Duxford confirmed they have no objection to this proposal from their aerodrome safeguarding perspective as it does not conflict with their safeguarding criteria. They were made aware of the responses provided by Cambridge Airport and the Ministry of Defence and confirmed that they agreed with their conclusions of no objection. However, they requested that the developer maintains contact with the airfield during the construction period in the case of any crane or drone usage, or road closures in case this effects their operations.
- 6.36 University of Cambridge (Estates Division) – **No objection subject to consultation on any material changes to the scheme and on the emerging technical designs.** The University of Cambridge's Estate Division Planning Manager confirmed that in principle the University is entirely supportive of the high-level project aspirations to improve sustainable transport solutions for Cambridge and the surrounding area. Having reviewed the proposals with specific regard to the potential impact upon the Lord's Bridge facility they welcomed the

fact that the issues they raised with the project team prior to the application had been taken into account. Of the information presented within the application, they confirmed they were comfortable that the designs have been prepared such that, provided they are implemented in the form shown, they will not pose a threat to the Lord's Bridge facility. However, they have requested that any changes to the scheme, such as lighting design or heights / materiality of the proposed structures etc. should trigger additional consultation with them to ensure their advice holds weight. Furthermore, further consultation should take place with regard to the emerging technical designs before they become embedded within the scheme, such as the convertors to be incorporated within the solar array and communication with buses etc. so that any required mitigation to control radio interference / suppression measures etc. can be incorporated within the design as it develops.

7. Representations

7.1 The following representations have been received in summary:

- 7.2 Hauxton Parish Council – **Object** on the basis of an increase in traffic and pollution. The parish council believes that this travel hub will create additional congestion on the A10, particularly during rush hours, which is already a problem through Hauxton and Harston. The Parish Council stated that they would like to see a longer slip road to ameliorate this during the morning peak period, and an exit which avoids M11 traffic having to go back onto the A10.
- 7.3 Harston Parish Council – **Concerns raised** regarding the traffic lights at this junction will disrupt the flow of traffic on the A10 and cause tailbacks towards Hauxton and Harston. They strongly recommended that a tunnel under the A10 is considered.
- 7.4 Trumpington Residents Association (TRA) – **Object** to the use of the existing agricultural bridge as the public transport route. The Association strongly supports the principle of establishing a new travel hub on land to the west of Junction 11 of the M11. In general, they confirmed that they are opposed to development in the Green Belt that remains between the Cambridge City edge and the neighbouring villages. However, they acknowledge that although a travel hub has adverse effects on the Green Belt it also has great benefits in much needed reduction of traffic on our roads, and is “not inappropriate development within the Green Belt” for the reasons given in the application, and offers significant mitigation in enhanced biodiversity and sustainable travel as identified in paragraph 7.11 of the Planning Statement. However, there is one aspect of the application to which they object strongly to and for which they believe there is a more effective alternative. This is the proposed use of the existing accommodation (former agricultural) bridge as the public transport route to provide access to and from the site across the M11. The Association's objection to this has been their consistent position throughout the development of the scheme but they consider their many representations have been set aside for reasons not shared with them. They provided 6 grounds of objection to the use of the agricultural bridge that broadly fall into environmental impacts; impact on the Country Park and the attractiveness of the area where the existing cycle route already runs; the adequacy of the proposed bridge for use by the Cambridge Autonomous Metro scheme which includes a one-way section that would slow transport down; and the lack of an alternative bridge for the buses to use without the restrictions imposed by the existing agricultural bridge. TRA consider the issues identified in their response are sufficient to refuse planning permission for this application, and to refer it back to the applicant for further consideration. They have stated that this consideration should include a full assessment of the proposed bus route which includes use of the

accommodation bridge against a segregated bus route using a dedicated bus bridge north of Junction 11 of the M11 and south of the agricultural bridge.

Other comments were also submitted by TRA that:

- raised concerns about the lit bollards proposed along the length of the shared use path from its entrance off the A10 across the new shared use bridge to the point where the path meets Hauxton Road at its junction with Addenbrookes Road, seeking a condition to assess other means of illumination such as studs set in to the path's surfaces.
- supported the installation of photovoltaic panels and commended that they are intended to "meet 31% of the forecasted energy requirements" of the Travel Hub and achieve "a 38% reduction in emissions" as set out in paragraph 6.68 of the Planning Statement. However, noting the intention that all of these panels are to be installed in the North Car Park by reason of lower ground levels and proximity to the M11, they raised concerns that the intention to angle them to obtain the maximum amount of energy, may be intrusive through glare to the Trumpington Meadows and Glebe Farm residential developments to which they are closest; suggesting that a planning condition should be imposed to satisfy that the positioning of the photovoltaic panels would have minimal adverse effect on said developments.
- noted that the proposed shared-use path is part of the wider Melbourn Greenway, and in line with consultation undertaken by Greater Cambridge Partnership (GCP) in 2019 GCP should develop a "rules of the road" or a code of conduct to manage the conflict between different users, particularly pedestrians and cyclists.
- stating that if planning permission is granted for the application in its current form, a feature of the existing planting on the slopes of the accommodation bridge across the M11 should not be overlooked. Dating it is assumed from the M11's construction in the 1970s, the slopes contain a host of plants not normally seen locally, including gorse and sea buckthorn. As these plants may be affected by earthworks, TRA ask that a way of preserving this valued feature is considered.

7.5 In response to the Regulation 25 consultation, TRA confirmed that they had additional objections to add to their original letter of 8th July 2020, whilst noting that their original objections on the use of the agricultural bridge had not been addressed and therefore remained unmet. They submitted that notwithstanding the additional information that has now been provided by the applicant, there remained gaps in the transport assessment information sufficiently important to warrant a further request to the applicant to fill the gaps outlined as follows:

- the serious issue of potential delay raised in the last sentence of the statutory consultee's comments [CCC_20_040_FUL_FROM_TRANSPORT_ASSESSMENT_35807, page 7] had not been properly addressed by the applicant in the view of TRA. They identified that this is already a complex junction at a strategically important point in Trumpington's road network – officially designated as a junction "hotspot" - and a vital artery to the Cambridge Biomedical Campus including Addenbrooke's and Royal Papworth Hospitals, and to Cambridge City Centre – as well as to Trumpington Park & Ride. They considered it will become significantly more complex with the proposed two-way public transport access to Trumpington Park & Ride and with the scheduled opening in 2023 of the Trumpington Meadows southern access road, which serves only as access to a construction haul road at present. TRA queried whether current

delays be exacerbated or not by the proposed new public transport access, and what measures are to be taken to improve traffic flow so that delays do not increase? These questions have not been addressed to their satisfaction. Until there are adequate answers, despite their support for the provision of the new travel hub, they do not believe that the application should proceed.

- Identified the existing significant tree belt between the single lane access to the Park & Ride and Hauxton Road, which widens towards the Park & Ride main entrance off Hauxton Road. A single bus only lane continues after the car park entrance and joins the roundabout within the Park & Ride for buses to gain access to the bus stops for passenger drop off and pick up purposes. TRA note that the application proposes to widen this road along all of its length which will make significant inroads into the tree belt and may also adversely affect the tree / shrub line between the access road and the car park, possibly also reducing the gap between the access road and the as yet incomplete Trumpington Meadows development. [Shown in CCC_20_040_FUL_CCC_HIGHWAYS_RESPONSE_TO_TRANSPORT_ASSESSMENT_36937, Appendix B] And this in an area where the planting has already been reduced to allow construction of additional bus bays by removal of the wooded bund which used to exist between the access road and the bus bay area. TRA consider this could have a significant adverse effect on both landscape and biodiversity – and possibly also on the housing development and have questioned what is being done to minimise and mitigate this loss?
- highlighted that “The Arboricultural Report identified a number of trees and shrubs to be removed for construction of the extended bus lane. Vegetation removed during construction *will be replaced where practicable.*” (their emphasis) [Detailed Planting Plan Sheet 11 Part B, in the additional documents], which they do not consider is adequate. The landscape and biodiversity implications need to be made much clearer and action to mitigate these effects stated in some detail; and their concern about the potential impact on future Trumpington Meadows residents needs to be allayed. The tree belt in question not only screens Trumpington Park and Ride from the Glebe Farm estate and Bishop’s Road dwellings on the other side of Hauxton Road but also forms part of the green entrance from the new city edge to Trumpington village and onward into Cambridge centre.
- raised concerns about the impact of the above changes on the pedestrian and cycle route alongside Hauxton Road from the west side of the junction with Addenbrooke’s Road/Osprey Drive to the northern entrance into the existing Park & Ride site. This route crosses the one-way slip road into the Park & Ride. With the opening of the Travel Hub and the completion of the homes in the southern part of the Trumpington Meadows development, there is likely to be significant growth in the number of pedestrians and cyclists using this path, alongside the growth in traffic on the two-way slip road. Given the heightened risk that arises, it is essential that measures are taken to ensure it remains a safe route. TRA propose that the applicant should be asked to provide additional information explaining how the risk will be minimised so that cyclists and pedestrians are kept safe.
- raised concerns over the impact of the Applicant’s proposals on Junction 11 of the M11 and the lack of detail provided to address the over capacity comments raised by the statutory consultee [CCC_20_040_FUL_FROM_TRANSPORT_ASSESSMENT_35807, page 11]. TRA confirmed that the proposed Travel Hub should not significantly impair traffic flow at Junction 11, and the eastbound access to the A10 eastbound is particularly important in the extended PM peak. The applicant should therefore be asked to respond with positive measures to reduce this operational over capacity.

- 7.6 Trumpington Meadows Community (TMC) as an amenity group – **Comments and concerns submitted neither objecting nor supporting the application.** Points made related to the effect on local ecology; distance to adjoining properties; conflict with local plan; an increase in traffic; and information missing from plans. TMC stated that the application site boundary shows a route running through the Trumpington Meadows park from the new shared use bridge to the river, which follows the route of an existing footpath but there is no indication of how its use would change. Also the busway or slip road would result in a serious intrusion into the park which is owned by the Wildlife Trust; in addition to the likelihood of an increase in traffic congestion from the additional use of junctions on Hauxton Road when the second access to Trumpington Meadows opens. Any development of the area from there to the M11 would create a volume of traffic that would be impossible to manage.
- 7.7 Wildlife Trust – **Object** and remain of the view that this proposal is the wrong scheme in the wrong place, that will put pressure on the adjacent Country Park and nature reserve area. However, noting that they consider it is highly likely to proceed they have confirmed that they have worked through the Landscape and Ecology Working Group (LEWG), to try to secure a scheme that minimises impacts and achieves the maximum enhancements for biodiversity; whilst acknowledging that as a Regulation 3 planning application a Section 106 cannot be obtained to provide the legal comfort necessary to remove their objection entirely.
- 7.8 The Wildlife Trust welcomed the intention of the applicant to appoint a specialist contractor to deliver the long-term management of the new habitats adjacent to and around the travel hub site. However, in order for this to be a success, they provided details of what mitigation they considered was necessary in relation to pressures on the Country Park and nature reserve outside of the red line application area and stressed the importance of a management plan to safeguard the long term management of the travel hub site that will need to complement the management of the adjacent Country Park and nature reserve e.g. in reinforcing current management approaches of hay cutting and grazing, and the dogs on leads policy that applies to the nature reserve part of the Country Park. To this end they confirmed the new land around the travel hub site will need to include dog walking routes and dedicated off lead areas to limit impacts on the adjacent nature reserve which should include dog bins. Furthermore a dedicated picnic area and clear signage on the travel hub site and within the adjacent Country Park and nature reserve informing visitors of the different nature and access zones was also seen as essential, particularly based on the full impacts that a 2000+ car park would place on this area, that they did not consider had been considered appropriately in the applicant's submitted information.
- 7.9 The Wildlife Trust proposed that the currently unfenced area of the meadow in the adjacent Country Park and nature reserve should be fenced to create two new grazing paddocks to help manage access and maintain the quality of the species-rich grassland that they have created. They also noted that their current ranger provision had been based on the Trumpington Meadows housing development and had not been based on additional visitors from what was effectively a large car park next to the nature reserve provision, so this pressure as a result of this proposal needed to be taken fully into account when assessing the scheme. As such, they recommended an access management and mitigation section should be incorporated into the landscape and ecology management plan that sets out the relationship with the adjacent Wildlife Trust Country Park and nature reserve land, and describes an access strategy and the desired recreational use of both the landscaped areas associated with the travel hub site and the adjacent land. This should include the

management measures, including any infrastructure and signage required to achieve the described access strategy.

7.10 Whilst the Wildlife Trust was broadly supportive of the measures included within the submitted Landscape and Ecology Management Plan, as a basis for the future management of the biodiversity net gain and greenspace areas, there was some disagreement around the timing of cutting practices and the length of time for the biodiversity net gain to be achieved on the site. In relation to biodiversity net gain, the Wildlife Trust also requested that a revised Appendix F-11 should be submitted with the correct version of Table 14 and the detailed biodiversity net gain calculations, which they considered was important so that an audited and agreed level of biodiversity net gain arising from this development is recorded in the public domain. However, when asked by planning officers if the submitted information was sufficient to be policy compliant, they did acknowledge that from the information submitted by the applicant it would be possible to achieve the minimum 10% biodiversity gain and whilst it was far from ideal, through control by planning conditions, this information could be secured as part of the pre-commencement conditions to be able to show this audit trail and final biodiversity net gain figure. However, if this planning condition route was recommended by planning officers the Wildlife Trust would request that the biodiversity net gain assessment is revised once a final scheme has been built and the areas managed for a minimum period of 30 years (and ideally secured in perpetuity) and monitoring reports to demonstrate continued success required at periodic periods throughout the 30 year management period. A monitoring programme should be included in the landscape and ecology management scheme as part of this request, which can also secure the final landscape and ecology proposals.

7.11 CPRE – **Raise concerns** surrounding the proposed development relating to:

- Car parking and electric charging – in particular the significant number of car parking spaces proposed (2,150) questioning if sufficient evidence existed to support them, and that only 108 of these car parking spaces were going to allow electric charging.
- Location and potential impacts – in particular that this is the ‘wrong scheme in the wrong location’ as it lies in the Cambridge Green Belt and adjacent to the Wildlife Trust Trumpington Meadows reserve, with potential impacts on both the Cambridge Green Belt and reserve through the development, with traffic, noise, light and air pollution, as well as an increase in footfall on the reserve and the impact that would bring to fragile habitats.
- Statutory Green Belt – in particular the erosion of the Cambridge Green Belt and the need to ensure significant weight is given to paragraphs 143 – 145 [now 147 – 149] of the NPPF, where they consider the “very special circumstances” required by paragraphs 143 and 144 [now 147 and 148] have not been demonstrated.
- Landscape and Biodiversity – in particular the ‘wide impact on the local valued landscape’, the loss of Green Belt land and erosion of openness; alongside concerns that safeguards need to be put in place to protect the biodiversity net gain with appropriate funding in perpetuity to include mitigation for the impacts on the adjacent nature reserve.
- Best and most versatile Farmland – in particular the need for best and most versatile land to be protected from development in accordance with the NPPF.
- Integration with wider local transport proposals – in particular concerns around how the proposal would integrate with other proposed transport schemes around Cambridge, including East-West Rail, the proposed Cambridge Autonomous Metro, the Travel Hub at Foxton, proposed busways, planned greenways etc.; and that as

well as being premature in advance of the CPCA new local Transport Plan, it is also heavily based on car travel.

7.12 Cambridge Past, Present and Future – **Object** as Cambridge PPF believes that this is the '*wrong scheme in the wrong place*'. They also see it as a '*short-term solution that will create a long-term impact*'. They therefore object to this application '*because it will result in building over the green belt countryside in order to create a giant car park and associated roads and other intrusive infrastructure; even though the applicant admits that "it is estimated the use of the Travel Hub would result in an increase of carbon emissions over the next 60 years".*' They also note '*that it will be at least 15 years before new trees/hedges grow sufficiently to mitigate the visual impacts of this scheme on the landscape*'. They consider this proposal '*is contrary to national and local green belt policies because it has not demonstrated that a green belt location is needed*'. Whilst they are supportive of renewable energy, the provision of car ports on which to locate these panels will have an impact on the purposes of the Green Belt. They object to the use of lighting bollards on the shared use path because they will generate a visual intrusion which is completely unnecessary as they consider that stud lighting is equally effective.

7.13 After reviewing the Regulation 25 information and confirming that all the issues they raised in their previous response (set out in paragraph 7.12 above) still stand, they raised the additional information / concerns to add to their original objection:

- Impact on adjacent nature area in country park/biodiversity impacts – in particular concerns surrounding the consultants assessment that this proposal will have no influence on the visitor pressures experienced by the Park and that this element should have been scoped into the EIA assessment.
- Green Belt Policy & Landscape – in particular concerns that the proposal is an unacceptable intrusion into an area of the Cambridge Green Belt and its openness, so it should not be approved as it fails to demonstrate special circumstances and could be accommodated through an extension to the existing park and ride site or at Foxton which are outside the Cambridge Green Belt, making it contrary to national and local planning policy.
- Climate Change Policy – in particular the conflict with local policy to achieve net zero emissions by 2050 in response to the climate change crisis, as this application would lead to an increase in carbon emissions over the next 60 years.
- Traffic modelling based on pre-pandemic data – in particular the application is based on pre-Covid traffic modelling that has not taken into account new ways of working and potential demand forecasts, so they suggest this would be premature to approve such a contentious scheme which could easily prove to be a damaging 'white elephant'.

7.14 Camcycle – **No objection**. Whilst Camcycle welcome application CCC/20/040/FUL and fully support the proposed NMU pathway and bridge, they remain neutral on the principle of a car park in this area, as they are concerned about the implied increase of car traffic in the vicinity of the site. Their original objection to a newly proposed additional staggered crossing stage on Hauxton Road that would turn the existing two-stage staggered crossing into a three-stage staggered crossing, has now been resolved by the applicant and was included in the Regulation 25 submission. Camcycle has confirmed that whilst they do have some lingering concerns about the potential spacing of bollards, design of any access control, and further detailed design that still has to be undertaken on the active travel route, as mentioned in the Transport Team response, Camcycle want to ensure that everything is

designed and built to be fully accessible, inclusive and in compliance with the government's latest policies and guidance. As such they confirmed that their concerns could be resolved and their original objection removed if a condition affirming the application of Local Transport Note 1/20 in the detailed design of the active travel route and any access control bollards: 'Details for the active travel/NMU route through the site, and any access controls for it, will be designed in accordance with Local Transport Note 1/20 and provided to the planning authority to be agreed prior to construction.' was applied.

7.15 Smarter Cambridge Transport (SCT) - **Strongly object** to this planning application on the grounds that it will:

- Undermine provision of rural bus services.
- Disadvantage people who depend on rural bus services because they do not have use of a car to access a Park & Ride.
- Increase rather than decrease carbon emissions, both in construction and use.
- Attract additional traffic to the local road network, exacerbating congestion on the A10 from Harston to M11 Junction 11.
- Have negative social benefit, i.e. will do more harm than good.
- Divert resources away from transport schemes and services that would provide wider social benefit.
- Undermine the business case and viability of CAM, envisaged as an extensive mass transit network, serving market towns and villages around Cambridge.
- Damage the ecology of land close to the River Cam and scar land that is protected by Green Belt status.

7.16 The SCT (a volunteer-run think tank and campaign group, formed in 2015 to advance sustainable, integrated and equitable transport for the Cambridge region; run by a team of around 30 people, with a wide range of expertise and interests – see www.smartertransport.uk) consider the scheme is incompatible with the adopted Local Transport Plan and South Cambridgeshire Local Plan, the National Planning Policy Framework, and the scheme's own objectives.

7.17 British Horse Society (Comments from East Regional Chair; County Access & Bridleways Officer for Cambridgeshire; Access Field Officer East; and Regional Manager for the Eastern Region) – **Support** the provision of horsebox parking within the Travel Hub which would allow access to the Trumpington Meadows Country Park, the rights of way network just off the A10 at Hauxton, the permissive bridleways linking to Great Shelford from the A10 and the permissive bridleways linking towards Granchester; which they consider aligns with the active travel provision promoted by [the former] Cambridgeshire and Peterborough Mayor [James Palmer] that must be embedded in transport projects in the same way for all modes. They noted that with increasingly busy and fast roads, many equestrians now have to travel their horses to places where they can ride in relative safety, such as on the bridleways and country park accessible from this hub.

7.18 Having sought confirmation that erroneous references to 'shared' paths and 'cyclists and walkers' were not meant to exclude equestrian access and that the applicant was effectively proposing a non-motorised user (NMU) route, which included equestrian access over the 'shared bridge', that would be designed with an appropriate surface for all users as has already been the case with the greenways, they welcomed the proposals. However, in raising these initial concerns they also drew attention to the fact there was no reference to the permissive access from Great Shelford which joins the A10 opposite the NMU path in

the applicant's documentation, nor was there any reference to the bridleway network from the A10, which are all well used. Taking these concerns into account, they consider that before this project commences it is essential a safe crossing of the A10 for NMU's is provided to mitigate the danger from the construction and the ongoing travel hub traffic. This should be a Pegasus crossing located at the junction of the NMU path on the Country Path with the A10 just opposite the permissive bridleway to Great Shelford. As such, they consider the provision of the site safe crossing should be a requirement of the planning permission approval.

- 7.19 Swavesey & District Bridleways Association - **Support** the plans to include horsebox parking and safe link to the non-motorised user network as part of the Trumpington Park and Ride development. However, they would like the Scheme to include the provision of a Pegasus crossing on the A10, to mitigate the increased traffic levels experienced already from the housing growth on the A10.
- 7.20 Barton and District Bridleway Group – **Support** the provision of horsebox parking within the Travel Hub, the mounting blocks and inclusion of a non-motorised user route on behalf of the Barton & District Bridleway Group that has over 120 members. They see the scheme to be of great benefit to local horse riders who want to access Trumpington Meadows Country Park without having to ride on the road. They consider the proposals will also enable horse riders who cannot ride too far to access a new area to ride and provide an opportunity for riders from other areas to travel to meet friends. With the fragmented nature of the Bridleway network, and the fact that only 22% of Rights of Ways are Bridleways, schemes like this are very much needed and welcomed by horse riders. The position of the horsebox parking will also allow horse riders from other areas to access local Bridleways and the proposed Greenways. However, they considered it is essential that a safe crossing of the A10 for NMU's is provided to mitigate the danger from the construction and the ongoing travel hub traffic. This should be a Pegasus crossing located at the junction of the NMU path on the Country Park with the A10 just opposite the permissive bridleway to Gt. Shelford.
- 7.21 Deloitte on behalf of Grosvenor Britain & Ireland (Grosvenor) and Universities Superannuation Scheme (USS) – **Support** the proposals for a new Park & Ride travel hub on land to the south of the M11; and have welcomed the thorough approach undertaken to consulting and engaging stakeholders given that the proposals will be developed partially on land owned by Grosvenor & USS. They acknowledged that they have held a number of meetings with the Applicant's consultant team in order to agree the details of the proposals relevant to their clients' site. They appreciate that a number of options for the busway route have been considered; and options assessed and eventually dismissed included provision for a tunnel under the A10 and a bus lane through the M11 gyratory. The preferred option was chosen on the basis that it was deliverable and will ensure the reliability and speed of journeys which they support.
- 7.22 They noted that the design of the site has taken into consideration its location within the Cambridge Green Belt and shared boundary with Trumpington Meadows Country Park, delivered by Grosvenor and USS as part of the housing development. Significant planting has been proposed to minimise the landscape and visual impact of the scheme which they welcome. They confirm that they have had extensive discussions on these points with the Applicant with respect to Grosvenor and USS's land and, in particular, in relation to the nature and location of the bunds which are being constructed currently as part of Trumpington Meadows. However, they raised two areas of the proposals that they wanted

to provide more detailed comments – drainage proposals and development in the Cambridge Green Belt.

- 7.23 In relation to drainage proposals they highlight the importance that the swales along the busway on the east of the M11 do not encroach on any realigned bunds and that both are the appropriate distance from each other. The bund profile should remain in line with the massing previously approved (and be no higher than 3.5 metres / 11.48 feet); and on the east side of the M11, the outfall that is being provided to the River Cam, which includes provision for a new swale into the existing Trumpington Meadows Country Park, should also not encroach on to the existing bund. Details of the interaction with the existing footpath, any reinstatement required, and planting should be provided as part of the conditions of any planning permission issued. They have requested that The Wildlife Trust, whose ownership the Country Park has transferred to, should be consulted on the access and maintenance implications of these drainage swales/pipes.
- 7.24 In relation to development in the Cambridge Green Belt, they support the approach the Applicant has taken in assessing alternative sites and the need for the facility. The existing Park & Ride at Trumpington Meadows has limited capacity and there is congestion in and out of the city at peak times. In concluding this work, they consider that it is clear that, in accordance with Para 146 [now 150] of the NPPF, there is a clear transport need for the Park & Ride location in close proximity to the M11 and that it will reduce the overall delays through the local network. The Green Belt Assessment prepared by Liz Lake Associates suggests that 'land to the east of the M11 provides a much stronger contribution to the immediate landscape of Cambridge compared to land west of the M11'. Whilst they do not disagree with this statement, they would highlight the changing nature of the area east of the M11 as a result of development. The Green Belt Assessment also suggests that the setting of Cambridge between the City and the M11 forms a 'very strong, distinct separation and overriding contribution to the Green Belt function'. They dispute this statement. As with the previous comment, they consider the Cambridge Green Belt in this location is changing and its function and role in relation to the openness and setting of the City should be considered in this context. Notwithstanding this, the busway located around the edge of the land allows for the setting and openness to be maintained in their opinion. As such they have requested that their comments are taken on board in consideration of this application.
- 7.25 Individual representations - There have been a total of 18 individual representations received, of which 3 are fully supporting the scheme, 9 are broadly supporting the scheme but raising additional requests or information to allow them to fully support the scheme, and 6 are totally opposing the scheme or raising concerns. The issues raised in the 18 representations received have been summarised into objections & concerns and then general support / further information or infrastructure requested as follows:

Objecting / raising the following concerns:

- A10 improvements not being made to accommodate this development
- Inappropriate for buses to use the existing agricultural bridge
- Convolved route for buses causing unnecessary delays and discomfort to passengers
- Seek a new bridge across the M11 for buses (rather than an upgrade to the agricultural bridge) as they requested during the applicant's pre-application consultation events

- New bridge across the M11 excluded from alternative options published in applicant's documentation
- Raised ramp taking shared use path to new bridge problematic for 3 reasons all relating to the proposed obstruction of access between the existing bridge and the existing concrete tracking heading south, running between the main coprolite ponds and the new park and ride site, and leading to the furthest four fields (the Water Meadow, Badgers Wood and the two grazing meadows of the Hauxton Corner
- Additional traffic and associated congestion, particularly through villages, as this scheme is effectively encouraging motor traffic with what is a huge park and ride in the green belt
- Question how much CO2 will the extra 2,000 car users create each year; how many will live within easy reach of this site and other existing park and ride sites; how many live within 4 miles of their destination being a suitable distance to cycle; and when all the Greenways are complete what is the expected trip rate and what percentage would have a) car available b) not drive and c) no car in household?
- Covid-19 implications and the 'new normal' not taken into account in modelling
- Potential implications for Greenways, particularly where increase traffic movements in villages will put people off cycling as an alternative to the car journey
- Increased pollution
- Visual impacts / blot on the landscape
- Impact on local ecology and adjacent Country Park, including impacts to historic coprolite ponds and surrounding mixed woodland that has been maturing for over 40 years
- Impact for foreseeable future, let alone the disruption during construction
- Loss of green belt and inappropriate development in the Cambridge Green Belt
- Intrusion of the adjacent Country Park during construction and operation
- Concerns over the southern most fields being cut off and taking too much land take based on proposed bus and cycle routes across the M11
- Close to adjoining properties
- General dislike of proposal
- Noise nuisance and loss of adjacent tranquil area in the Country Park
- Noise and light pollution
- Contrary to Climate Change Emergency declared, which the applicant acknowledges in the application with an increase in carbon emissions over the next 60 years
- No account of alternatives considered for the period up until the Cambridge South Station opens in 2025, the Cambridge Autonomous Metro (CAM) scheme comes forward or the Foxton Travel Hub is progressed, which avoids this becoming a 'white elephant' that is contrary to sustainable development and the declared Climate Change Emergency
- No assessment to show investing in rural bus services wouldn't be a better and more sustainable option
- More information and alternatives should be sought as part of the Transport Assessment to take account of wider schemes promoted by the Mayor e.g. the cost of the scheme without maintenance would allow 10 – 15 years of bus subsidies to be made instead
- Out of keeping with character of area
- Over development and need basis not set out
- Missing information from plans and / or not clear where roads lead to entering the current park and ride site, so difficult to assess the implications
- Strain on existing community facilities

- Impact on property values

In support / raising requests for further information or infrastructure to gain full support:

- Support the scheme and the inclusion of facilities for horse riders, where specific horse box parking spaces and a safe tack up area are proposed which allow access to off road riding opportunities as a local community asset, particularly as there is now no access to such facilities in the immediate area
- Commend the application on setting a high example of the multi-use recreational amenities with inclusion of horse box parking and a corral for equestrian users
- Welcome safe routes for equestrians, including access to bridleways and the Country Park
- Request the inclusion of a Pegasus crossing on the A10 to make it safer for equestrians to cross
- Ask if signage can be erected to ensure horse box spaces are reserved for such a use?
- Although acknowledges outside of the current application, ask if a dedicated slip onto the M11 from Hauxton could be considered to avoid delays and blocking of the A10 access?

7.26 A copy of the full representations will be shared with members of the Planning Committee one week before the meeting.

8. Planning Policy

8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The relevant development plan policies are set out in paragraphs 8.4 to 8.7 below.

8.2 The National Planning Policy Framework (NPPF) (2021) sets out the Government's planning policies and how these are expected to be applied. At its heart is a presumption in favour of sustainable development (paragraph 11). It states that for decision-taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most relevant for determining the application are out of date, granting permission unless:
 - i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of this Framework taken as a whole.

8.3 The following paragraphs within the NPPF (2021) are considered to be the most relevant to this application:

- Paragraph 2 - Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations

indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.

- Paragraph 7 - The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection.
- Paragraph 8 - Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):
 - a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, beautiful and safe places, and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- Paragraph 55 - Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- Paragraph 57 - Planning obligations must only be sought where they meet all of the following tests:
 - a) necessary to make the development acceptable in planning terms;
 - b) directly related to the development; and
 - c) fairly and reasonably related in scale and kind to the development.
- Paragraph 92 - Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

- Paragraph 93 - To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;

b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;

c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;

d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and

e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

- Paragraph 100 - Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.
- Paragraph 105 - The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

- Paragraph 111 - Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- Paragraph 112 - Within this context, applications for development should:
 - a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
 - b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
 - c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
 - d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
 - e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
- Paragraph 130 - Planning policies and decisions should ensure that developments:
 - a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

- Paragraph 147 - Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- Paragraph 148 - When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- Paragraph 150(c) - Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:
 - c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- Paragraph 151 - When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.
- Paragraph 152 - The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- Paragraph 174 - Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
 - e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever

possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

- Paragraph 180. When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

- Paragraph 183. Planning policies and decisions should ensure that:

a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);

b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and

c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.

- Paragraph 185. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;
- b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

- Paragraph 194 - In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- Paragraph 195 - Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
- Paragraph 196 - In determining applications, local planning authorities should take account of:
 - a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness.
- Paragraph 199 - When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- Paragraph 202 - Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- Paragraph 203 - The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets,

a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Cambridgeshire and Peterborough Minerals and Waste Core Strategy Development Plan Document – adopted July 2011 (M&WCS)

8.4 The Cambridgeshire and Peterborough Minerals and Waste Core Strategy Development Plan Document (M&WCS) was adopted in July 2011 and sets out the strategic vision and policies for minerals and waste across Cambridgeshire up to 2026. The following policy is of relevance to both the adjacent areas of the proposal and the drainage connection to the River Cam for sand and gravel deposits, that need to be considered in the determination process:

- CS26 – Mineral Safeguarded Areas

South Cambridgeshire Local Plan September 2018 (SCDCLP)

8.5 The South Cambridgeshire Local Plan (SCDCLP) was adopted in September 2018 and sets out the strategic vision, planning policies and allocations (excluding minerals and waste) for South Cambridgeshire to guide the future development of the district up to 2031. It includes policies on a wide range of topics such as housing, employment, services and facilities, and the natural environment. The following adopted Local Plan policies are of particular relevance to the proposals that need to be considered in the determination process:

- Policy LP/1: Superseded Policies referred to in Adopted Area Action Plans
- Policy S/3: Presumption in favour of Sustainable Development
- Policy S/4: Cambridge Green Belt
- Policy S/6: The Development Strategy to 2031
- Policy S/7: Development Frameworks
- Policy CC/1: Mitigation and Adaptation to Climate Change
- Policy CC/2: Renewable and Low Carbon Energy Generation
- Policy CC/4: Water efficiency
- Policy CC/6: Construction Methods
- Policy CC/7: Water Quality
- Policy CC/8: Sustainable Drainage Systems
- Policy HQ/1: Design Principles
- Policy HQ/2: Public Art and New Development
- Policy NH/2: Protecting and Enhancing Landscape Character
- Policy NH/3: Protecting Agricultural Land
- Policy NH/4: Biodiversity
- Policy NH/6: Green Infrastructure
- Policy NH/8: Mitigating the Impact of Development In and Adjoining the Green Belt
- Policy NH/14: Heritage Assets
- Policy SC/2: Health Impact Assessment
- Policy SC/9: Lighting Proposals
- Policy SC/10: Noise Pollution
- Policy SC/11: Contaminated Land
- Policy SC/12: Air Quality
- Policy SC/14: Odour Impact Assessments and Other Fugitive Emissions to Air

- Policy TI/2: Planning for Sustainable Travel
- Policy TI/3: Parking Provision
- Policy TI/6: Cambridge Airport Public Safety Zone
- Policy TI/7: Lord's Bridge Radio Telescope (Consultation Area 1)

Cambridge City Council Local Plan October 2018 (CCCLP)

8.6 The Cambridge City Council Local Plan (CCCLP) was adopted in October 2018 and sets out the strategic vision, planning policies and allocations (excluding minerals and waste) for Cambridge City to guide the future development of the city up to 2031. It includes policies on a wide range of topics such as housing, employment, services and facilities, and the natural environment. The following adopted Local Plan policies are of particular relevance to the proposals that need to be considered in the determination process:

- Policy 1: The Presumption in favour of Sustainable Development
- Policy 4: The Cambridge Green Belt
- Policy 5: Sustainable transport and infrastructure
- Policy 7: The River Cam
- Policy 8: Setting of the City
- Policy 18: Southern Fringe Areas of Major Change
- Policy 28: Carbon reduction, community energy networks, sustainable design and construction, and water use
- Policy 29: Renewable and low carbon energy generation
- Policy 31: Integrated water management and the water cycle
- Policy 33: Contaminated land
- Policy 34: Light pollution control
- Policy 35: Protection of human health and quality of life from noise and vibration
- Policy 36: Air quality, odour and dust
- Policy 37: Cambridge Airport Public Safety Zone and Air Safeguarding Zones
- Policy 39: Mullard Radio Astronomy Observatory, Lord's Bridge
- Policy 55: Responding to context
- Policy 56: Creating Successful Places
- Policy 59: Designing landscape and the public realm
- Policy 61: Conservation and enhancement of Cambridge's historic environment
- Policy 69: Protection of sites of biodiversity and geodiversity importance
- Policy 70: Protection of priority species and habitats
- Policy 71: Trees
- Policy 80: Supporting sustainable access to development
- Policy 81: Mitigating the transport impact of development
- Policy 82: Parking management

South Cambridgeshire District Council – Area Action Plan (2008):

8.7 Policies in adopted Area Action Plans provide specific guidance for the areas that they cover, which are defined on the South Cambridgeshire District Council Policies Map. SCDCLP Policy LP/1 identifies where policies of the Local Development Framework referred to in adopted Area Action Plans are superseded by policies of the SCDCLP. The Cambridge Southern Fringe Area Action Plan (2008) (CSFAAP) was produced by SCDCLP noting that the urban extension crosses the South Cambridgeshire / Cambridge City boundary. It is part of the adopted development plan, which is of relevance for development

in this area. In particular the following policies of the CSFAAP are considered relevant to these proposals:

- CSF/1 The Vision for the Cambridge Southern Fringe
- CSF/2 Development and Countryside Improvement Principles
- CSF/5 (1b-e) Countryside Enhancement Strategy
- CSF/12 Landscape Principles
- CSF/14 Linking Trumpington West To Its Surroundings
- CSF/15 Enhancing Biodiversity
- CSF/16 Archaeology at Trumpington West
- CSF/18 Access to the Countryside
- CSF/22 Construction Strategy
- CSF/24 Management of Services, Facilities, Landscape and Infrastructure

South Cambridgeshire District Council and Cambridge City Council – Shared Supplementary Planning Guidance:

8.8 Supplementary Planning Documents (SPDs) are intended to expand upon policy or provide further detail to policies in the adopted development plan. The following SPDs have been adopted by both South Cambridgeshire District Council and Cambridge City Council to support the SCDCLP and CCCLP:

- Cambridgeshire Flood and Water SPD (November 2018 for SCDCLP and December 2018 for Cambridge City Council)
- Sustainable Design and Construction SPD – prepared jointly with Cambridge City Council (January 2020)

South Cambridgeshire District Council - Supplementary Planning Guidance:

8.9 In addition to the above SPDs, as identified on South Cambridgeshire District Council's website, the following documents were adopted to provide guidance to support previously adopted Development Plan Documents that have now been superseded by the SCDCLP. However, these documents are still material considerations when making planning decisions, with the weight in decision making to be determined on a case by case basis having regard to consistency with national planning guidance and the adopted SCDCLP:

- Biodiversity SPD (July 2009)
- Landscape in New Developments SPD (March 2010)
- Trees and Development Sites SPD (January 2009)
- Public Art SPD (January 2009)
- Open Space in New Developments SPD (January 2009)
- District Design Guide SPD (March 2010)
- Health Impact Assessment SPD (March 2011)

Cambridgeshire and Peterborough Mineral and Waste – Emerging Local Plan

8.10 The Council has been jointly preparing, with Peterborough City Council, a new Minerals and Waste Local Plan. This new Local Plan looks forward to 2036 and makes provision for new minerals and waste management development to support the growth of existing and new communities planned in Cambridgeshire and Peterborough. It sets out policies by which planning applications for mineral and waste management development will be determined,

covering such matters as biodiversity, restoration and traffic and highways; whilst also protecting and safeguarding existing mineral and waste sites and important mineral resources and allocations from new development that would prejudice their use.

- 8.11 The Councils submitted the Local Plan, the supporting evidence, and all the representations received, to the Secretary of State for Examination on 24 March 2020. The Cambridgeshire and Peterborough Minerals and Waste Local Plan Independent Examination was held between 15 and 17 September 2020 and the Councils received the Inspector's findings on 26 March 2021, confirming that the plan was 'sound' subject to the main modifications set out in his report. Officers are currently seeking approval to adopt the Cambridgeshire and Peterborough Minerals and Waste Local Plan, that will supersede the Cambridgeshire and Peterborough Minerals and Waste Core Strategy Development Plan Document (adopted July 2011) and the Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Development Plan Document (adopted February 2012) once adopted. On the basis that the Local Plan may be adopted by both Councils just ahead of this application being considered, officers will provide an oral update at the meeting for the benefit of Members.

Cambridge City Council and South Cambridgeshire District Council – Emerging Local Plan

- 8.12 Cambridge City Council and South Cambridgeshire District Council are in the process of working together to prepare an updated joint Local Plan for the Greater Cambridge area. Consultation ended in February 2020 on the Greater Cambridge Local Plan – The First Conversation. This document sought to ask about the kind of place residents and businesses want Greater Cambridge to be in the future. It explored the 'big themes' – climate change, biodiversity, social inclusion and great places – that will influence how homes, jobs and infrastructure are planned, and where growth might go. They have processed the large volume of feedback and comments they have received and prepared a report on the consultation results and key findings, that was taken to their Members in June 2020. They have been developing the evidence base for the plan and testing possible growth levels and strategic spatial options for the Plan, and in November 2020 published a set of initial reports including a Sustainability Appraisal.
- 8.13 At present this emerging plan is at a very early stage and the timetable for plan making was agreed in line with the above June 2020 report and published in the Council's Local Development Scheme (LDS) which took effect on 13 July 2020. The LDS states that the next stage of development for the emerging Local Plan is the Preferred Option Consultation that is planned for Summer / Autumn 2021. As such, at this very early stage of plan making there are currently no emerging policies that need to be considered in relation to this planning application.

9. Planning Considerations

- 9.1 The main planning considerations in relation to this planning application are:
- Principle of Need and Justification
 - Green Belt considerations, including alternative sites considered and whether the proposal should be considered as 'inappropriate development'
 - Landscape / townscape and visual impact
 - Heritage considerations, including the setting of the City of Cambridge

- Archaeology
- Protection of Lord's Bridge Radio Telescope
- Ecology and Biodiversity
- Best and most versatile Farmland
- Transport and Parking considerations, including consideration of COVID-19 on travel patterns and transport modelling for this proposal
- Highway improvements and wider highway considerations including possible future transport schemes
- Climate Change and Sustainability
- Residential Amenity
- Surface Water, Foul Water Drainage and Flooding (Flood and Water Management)
- Public Art
- Airport Safety
- Other issues, including air quality, health impact assessment and contaminated land

Principle of Need and Justification

- 9.2 This Regulation 3 application for a Travel Hub in Cambridge South West is accompanied by a letter stating that it *"is proposed to create more car parking spaces at a new site in order to accommodate demand that is currently forecast in the medium to long term as the existing Trumpington Park and Ride site is currently full"*. This statement by the applicant made with the submission in June 2020 takes account of the expansion that has already been undertaken on the existing Trumpington Park and Ride site under planning permission C/5001/18/CC; where in order to facilitate that expansion to accommodate 274 additional car parking spaces, additional bus and coach stops and layout area etc., officers noted it needed to remove much of the landscaping, which also led to a replacement of the surface water attenuation pond with underground tanks, leaving further expansion within the site boundary limited.
- 9.3 Furthermore, whilst acknowledging that the COVID-19 pandemic has led to a change in the way the existing Trumpington Park and Ride site has been used over the last 12 months, officers acknowledge that the proposed Travel Hub at Junction 11 is one of the key strategic projects that has been identified by the Greater Cambridge Partnership (GCP) to ease congestion into the City of Cambridge and decrease journey times owing to significant growth within the surrounding area and to reduce the number of cars travelling into Cambridge city centre, and to the Cambridge Biomedical Campus.
- 9.4 In addition to the above, planning officers have acknowledged the applicant's need for additional Travel Hub capacity along the Royston to Cambridge corridor that is documented and has been identified within the Cambridgeshire Local Transport Plan (2011 - 2031), and the Transport Strategy for Cambridgeshire and South Cambridgeshire (2014) that were undertaken to support the wider planning proposals and allocations in these areas, and more recently in the Cambridgeshire and Peterborough Combined Authority Local Transport Plan.
- 9.5 Given the justification provided by the applicant and that the need for additional Travel Hub capacity along the Royston to Cambridge corridor is identified within key Transport documents stated in paragraph 9.4, planning officers consider the proposed development would meet the demand in providing a sustainable transport solution offering additional capacity for the locality and the opportunity for a change in modal shift in accordance with paragraph 105 of the NPPF (2021), SCDCLP (2018) Policy TI/2 and CCCLP (2018) Policy

5, irrespective of whether wider schemes within this corridor come forward or not. Nonetheless, whilst the principle of development is supported in policy terms, it is necessary for the application to be considered against the wider development plan policies before reaching a final recommendation. These wider considerations are set out below.

Green Belt considerations, including alternative sites considered and whether the proposal should be considered as ‘inappropriate development’

- 9.6 Whilst the Cambridge Green Belt is a singular designation across both Cambridge City and South Cambridgeshire, the red line area of the proposals (as identified in Agenda Plan 1) cross the administrative boundary of both authorities, with the Travel Hub site itself sitting within South Cambridgeshire. Nonetheless, the full Green Belt designation and its purpose need to be considered in the context of these proposals, alongside whether the proposals for assessment purposes should be considered as ‘inappropriate development’ taking account of case law; and consideration of the ‘very special circumstances’ for the Green Belt, if officers consider the context to be set as inappropriate development; alongside any harm and visual impact. These are all set out and considered further below before officers provide their view on the weight to be afforded to this significant planning constraint in the planning balance before a decision is reached.

Purpose of the Cambridge Green Belt

- 9.7 The preservation of the Cambridge Green Belt within South Cambridgeshire is supported locally by SCDCLP (2018) Policy S/4 where it maintains a rural edge to Cambridge and protects key views, seeking to maintain and enhance the quality of its settings. The Green Belt also serves to protect the scale and rural character of Green Belt villages such as Hauxton by preventing them from merging with adjacent villages; and preserving the unique character of Cambridge as a compact, dynamic city with a thriving historic centre. The SCDCLP acknowledges a number of factors that define the special character of Cambridge and its setting, which include the following:
- Key views of Cambridge from the surrounding countryside
 - A soft green edge to the city
 - A distinctive urban edge
 - Green corridors penetrating into the city
 - Designated sites and other features contributing positively to the character of the landscape setting
 - The distribution, physical separation, setting, scale and character of Green Belt villages; and
 - A landscape that retains a strong rural character.
- 9.8 Similar preservation is also set out within the City of Cambridge and is supported by CCCLP (2018) Policy 4 where it seeks to align with national policy and preserve the unique setting and special character of the city which includes green corridors that penetrate deep into the urban and historic heart of Cambridge. As identified in the CCCLP (2018) supporting text, both Cambridge City Council and South Cambridgeshire District Council are keen to see the Green Belt as a positive rather than a purely negative planning tool. In stating this it is acknowledged that opportunities have been taken at Trumpington to shape a new Green Belt edge that enhances the landscape setting of the city, as well as enhancing opportunities for recreational access. The Cambridge Green Belt extends into

the countryside that surrounds Cambridge City and separates it from Hauxton village. Its total area is approximately 26,340 hectares (65,088 acres).

- 9.9 From a national planning perspective, the NPPF (2021) sets out in paragraph 137 that *'great importance'* is attached to Green Belts, with *'the fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'*.
- 9.10 The purpose of the Green Belt is set out in paragraph 138 of the NPPF (2021) which states that the Green Belt serves five purposes:
- (i) to check unrestricted sprawl of large built up areas
 - (ii) to prevent neighbouring towns merging
 - (iii) to assist in safeguarding the countryside from encroachment
 - (iv) to preserve the setting and special character of historic towns; and
 - (v) to assist in urban regeneration by encouraging the use of previously developed sites.
- 9.11 In considering matters relating to the development taking place within the Green Belt it can be useful to consider the following questions, these are considered in turn in this report as part of this section:___
- 1) Is the development inappropriate? How should effects on openness be considered?
 - 2) Would there be any other harm (ie non-Green Belt factors, for example to character & appearance), that weigh against the development?
 - 3) If the development is inappropriate, are there any 'other considerations' which would weigh in favour of it?
 - 4) If any 'other considerations' exist, do they clearly outweigh the harm to the Green Belt, and any other harm? (ie carry out the 'Green Belt balancing exercise').
 - 5) If 'other considerations' clearly outweigh the harm, do 'very special circumstances' exist?
- 9.12 Paragraphs 147 - 149 of the NPPF (2021), referenced in Section 8 of this report, establish the principle that development within the Green Belt that is considered to be *'inappropriate development'* which is harmful to the Green Belt and should not be approved except in *'very special circumstances'*. Certain other forms of development within the Green Belt are considered to be *'not inappropriate'* providing they preserve the openness and do not conflict with the purposes of including land within it, which are set out in NPPF (2021) paragraph 150 (a-f). Local transport infrastructure developments within the Green Belt are included within paragraph 150 (c). It is on this basis that the applicant provided evidence to demonstrate why they considered the Travel Hub proposal was considered to be *'not inappropriate'* development as defined by the NPPF, which they supported by recent planning case law. They also provided the necessary evidence to demonstrate why the proposal within a Green Belt location was necessary and can be justified within the planning balance, as documented in paragraphs 6.38 to 6.47 of their Planning Statement. They also provided sufficient information to allow planning officers to determine if *'very special circumstances'* existed in line with NPPF paragraph 151 in the event that they did not consider that the openness was preserved or that the purposes of including the land within the Green Belt were not met, which included sufficient information to address the renewable energy infrastructure being considered as inappropriate under NPPF paragraph 151. In addition, the applicant provided a Planning Statement Addendum to address the landscape and visual concerns in the Green Belt raised during the consultation process to help the decision-making process.

Assessment of whether the proposals are 'inappropriate development' or not

- 9.13 As is acknowledged in the applicant's Planning Statement Addendum document in paragraph 3.2, the impact of a development on the openness of the Green Belt is a matter of planning judgement, not law. This was confirmed in a recent Supreme Court decision (Samuel Old Brewery v Yorkshire County Council) which was referenced in the applicant's Planning Statement. It is therefore for the decision maker to consider whether the proposal is 'inappropriate' or 'not inappropriate' in their planning balance as a material consideration, which includes the consideration of visual openness.
- 9.14 Having regard to the purpose of the Green Belt discussed in paragraphs 9.7 to 9.12 above, and the reference in paragraph 150 of the NPPF (2021) which states other forms of development that are '*not inappropriate*' in the Green Belt '*provided they preserve its openness and do not conflict with the purposes of including land within it*' (our emphasis), planning officers consider that the scale and nature of the development being considered here does not sit entirely comfortably with those purposes set out in NPPF paragraph 137 i.e. '*by keeping land permanently open*' and '*their openness and their permanence*'. Furthermore, the relevant case law examples provided by the applicant, whilst supportive of their approach, was not necessarily looking at the same scale and type of proposal being proposed here. This was particularly true in the case of the recent Supreme Court decision of Samuel Old Brewery v Yorkshire County Council, which related to a mineral site. Whilst mineral sites are often worked for substantial periods of time, they are nonetheless still considered to be a temporary use of land that is temporary in nature, which this application is not. As such, whilst planning officers can acknowledge these planning decisions and the guidance that was contained in the original Planning Policy Guidance 2 (PPG2) document on the Green Belt, which included reference to Park and Ride schemes; officers have for the purposes of this application chosen to conduct their planning balance assuming that it is inappropriate development that needs to demonstrate 'very special circumstances'. This aligns with a similar decision taken by South Gloucestershire Council on a smaller scheme in Yate (which lies in the Bristol/Bath Green Belt) in October 2020.
- 9.15 In reaching the above conclusion planning officers will consider paragraph 148 of the NPPF (2021) which states '*when considering any planning application, local planning authorities should ensure that substantial weight is given to the harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations*' (our emphasis). The following sections of this report take into account the weight and matters used by planning officers for the purposes of their planning balance, including the substantial weight given to the Green Belt. This has been provided to offer assistance to members of the Planning Committee, in helping them carry out a similar exercise before reaching a final decision.

Assessment of 'very special circumstances'

- 9.16 Although the applicant does not specifically set out a section on 'very special circumstances' within their submission documents, as they have used paragraph 150(c) for local transport infrastructure developments within the Green Belt which can be viewed as 'not inappropriate', planning officers are content that sufficient information has been supplied to assess if 'very special circumstances' exist in line with NPPF paragraph 148 and for the renewable energy infrastructure in line with NPPF paragraph 151. This has already been acknowledged in paragraph 9.12 of this report and the following takes

account of the information supplied in the applicant's Planning Statement and also in their Planning Statement Addendum, alongside the wider submission documents, which includes the Liz Lake Green Belt Options Assessment document.

9.17 Once decking of the existing Trumpington Park and Ride site was discounted based on its impact on the Cambridge Green Belt and inability to provide sufficient forecast capacity requirements, four different sites were considered in the A10/M11 area based on their proximity to that corridor and residential areas by Liz Lake Associates, with each assessed against the five purposes of including land within the Green Belt at National Level and the three Cambridge Green Belt purposes defined in the supporting text for SCDCLP (2018) Policy S/4 and CCCLP (2018) Policy 4 – namely to Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre; Maintain and enhance the quality of its setting; and Prevent communities in the environs of Cambridge from merging into one another and with the city. The Green Belt Assessment set out that the assessment of the four sites was a finely balanced exercise, with all four of the sites either having a very strong or positive contribution to Green Belt purposes and openness of the Green Belt. However, the chosen Travel Hub site was considered to contribute to the purposes of including land in the Green Belt to a lesser extent than the other three parcels of land (which were considered to be stronger overall by comparison) for the following reasons:

- It lies to the west of the detracting M11 corridor and has a more rural location than the other parcels (particularly those on the east side of the M11).
- The immediate but open landscape setting of Cambridge between the City and the M11 forms a very strong, distinct separation and overriding contribution to the Green Belt function at the south west of the City. Other parcels were therefore considered to have a stronger contribution to Green Belt purposes.
- The compact and dynamic nature of the historic City is more closely associated with land to the east of the M11.
- Land to the east of the M11 forms part of the distinctive gateway to the city focussed around high quality urban edges at Glebe Farm and Trumpington Meadows.
- Land to the east of the M11 provide a much stronger contribution to the immediate landscape setting of Cambridge, compared to land west of the M11, which forms part of the wider landscape.
- At a local level, the merging of village settlements is most apparently reliant on the other three parcels. The application site, which lies in the immediate setting of Harston is strongly reliant on the immediate landscape resource of the Cam Valley extending north to and bounded by the M11 and Cambridge Road. The other three parcels fall within the visual and spatial sphere of the historic core of one or more of Haslingfield, Hauxton and Shelford's. However, the application site is the parcel least washed over by the visual and spatial alignment associated with one or more of the 'string of villages' to the south west of Cambridge.

9.18 Each of the four parcels of land assessed by Liz Lake Associates were being considered to provide a Travel Hub with the potential to encourage modal shifts into Cambridge city centre and the Cambridge Biomedical Campus (including potential improvements to existing walking and cycling links and services). The Liz Lake Associates (2019) Cambridge Western Orbital, Green Belt Options Assessment. Prepared on behalf of Strutt and Parker for Greater Cambridge Partnership, February 2019 provides a detailed assessment of this process which was provided in full in Appendix B of the Applicant's Planning Statement. Each parcel or parcels were based upon key characteristics identified in the published

Cambridge Landscape Character Assessment, land use as well as clear physical features or readily identifiable boundaries, such as urban edge, roads, railways, streams, water features, belts of trees and woodland. The appropriate site needed to be able to provide sufficient space for the facilities to be provided and maximise interchange opportunities between modes of transport. It is also shown as important that any site must enable a reduction in traffic on the busy M11 Junction 11. All the options considered were within the Cambridge Green Belt.

- 9.19 The chosen site (Parcel C) is shown as supporting the key benefits being sought from the Travel Hub site, whilst also respecting the Cambridge Green Belt location. In particular this noted the slightly lower landform of this parcel of land, which along with the structural vegetative features, together with the role of the Cam valley corridor to the south west was considered by the applicant's consultants to provide better visual containment compared to the other sites. It is considered that the physical and visual integration of elements associated with the Travel Hub would be more successfully accommodated on the application site. In addition, as part of the Mott MacDonald Outline Business Case undertaken, having regard to a range of transport, economic, financial and environmental factors, it is noted that the application site scored well against the other three parcels of land, particularly having regard to meeting the transport objectives of the scheme. Key benefits identified by planning officers from the information provided by the applicant include:
- Evidence provided to demonstrate that in Green Belt terms the application site was chosen to assist in terms of minimising and reducing conflict with the purposes for including land within the Green Belt and seeking to preserve the openness of the Green Belt as far as possible.
 - The proposed Travel Hub scheme provides significant benefits in terms of cycling and walking. As set out in detail within the Transport Assessment, prepared by Mott MacDonald the proposals include provision for a new lit 5-metre-wide shared use NMU path to the north of the Travel Hub site. This path also includes provision for a new segregated 5 metre bridge over the M11, which connects up with wider cycling infrastructure routes.
 - As detailed within the Applicant's Transport Assessment the new site would provide the facility required to meet the identified modelling need of an additional 2,150 car parking spaces to be available by 2036. This is to provide capacity for the growth on the Cambridge Biomedical Campus; patients and visitors anticipated; the anticipated demand from key companies such as AstraZeneca and R&D arm MedImmune on the Cambridge Biomedical Campus; the arrival of the Royal Papworth Hospital; the identified growth of the Addenbrookes Campus; and the delivery of wider substantial growth in and around Cambridge, which will put further demand on people travelling to the City Centre for work and leisure.
 - Maximise the potential for journeys to be undertaken by sustainable modes of transport.
 - Supporting section 9 of the NPPF which sets out detailed guidance in relation to the promotion of sustainable transport in terms of policy development and consideration of development proposals and paragraph 103 [now 105] of the NPPF which states that the planning system should actively manage patterns of growth to promoting the objectives of sustainable modes of transport, to help to reduce congestion and emissions, which would improve air quality and public health.
 - Aligns with paragraph 110 [now 112] of the NPPF which states that applications for development proposals should give priority to pedestrian and cycle movements to facilitate access to and encourage the use of public transport; address needs for people with disabilities and reduced mobility in relation to all transport modes; create places that are

safe, secure and attractive and respond to local character and design standards; allow provision for efficient delivery of goods, and access by services and emergency vehicles; and designed to enable charging of plug-in and other ultra-low emission vehicles, in safe, accessible and convenient locations.

- Policies 80 and 81 of the adopted Cambridge City Council Local Plan (2018) and TI/2 of the South Cambridgeshire District Council Local Plan (2018) set out support for the promotion for walking and cycling, infrastructure improvements and promotion of sustainable transport, which this Travel Hub proposal promotes.
- Scheme designed to reduce (or avoid a negative impact on) general traffic levels and congestion through reducing traffic north east of M11 J11 (along Hauxton Road and through Trumpington), by encouraging trips headed for the city centre and Cambridge Biomedical Campus to transfer to another mode; reducing traffic flow and delay at M11 J11, particularly in the AM peak, including reducing flows associated with non-motorway traffic that pass across the junction (A10-A1309); and reducing delays on the A10 through Harston and Hauxton, on the approach to M11 J11.
- Well placed to intercept car trips on the approach to the M11 Junction 11, without having to queue on the gyratory.
- The proposed improvements to the north bound slip of the M11 Junction 11 allow for ease of access to the site without the need to travel round the gyratory and queue on the approach to Hauxton Road.
- Although the proposed bus route, does also include a small proportion of land on the east side of the M11, the route selected, proposes to keep the bus route close to the M11 and Hauxton Road, as the applicant was advised by GCSP colleagues, with a large proportion of the route shielded by the existing bunds adjacent to the M11. Therefore, the open nature of the approach to Cambridge would be largely maintained as a result of the proposed development
- The Photovoltaic Cells, whilst not falling within the exceptions set out in NPPF paragraph 146 [now 150], are only proposed on the northern of the three car park areas, in a location that is on the lower part of the site and in closest proximity to the M11, providing provision for 108 bays with electric vehicle (EV) chargepoints provided initially. Whilst the provision of 4-metre-high PV Panels will have some impact on the openness of the Green Belt, the more sensitive and open areas of the existing site do not propose the provision for the Photovoltaic cells at this stage. The PV panels are considered to be ancillary to the transport infrastructure scheme and the design allows for these panels to meet 31% of the forecasted energy requirements of the site which would result in a saving of 23 tonnes of carbon dioxide equivalent over the lifetime of the Scheme which is estimated at 60 years. Furthermore, the design ensures that underground infrastructure (ducting) is provided allowing for 100% provision and further panels to be added in the future should permission be sought and granted to increase this energy generation capability.
- The car park has been broken up into three distinct areas, with extensive planting, including extensive woodland planting to the north-east and south east boundaries of the Travel Hub site in order to minimise the visibility of the Travel Hub on the wider landscape, with a real potential for biodiversity net gain.
- The road widening along the A10 and M11 north bound slip road utilise land immediately adjacent to the existing carriageway in order to minimise encroachment into the Green Belt.
- The proposed new NMU bridge over the M11, whilst will create a new physical structure in the Green Belt, has been located in close proximity to the existing agricultural bridge / accommodation bridge and in the context of the M11 which is already considered to be a visually detracting element within the existing Green Belt.

- The proposed Travel Hub building is situated in a location that is central to the Travel Hub car park. In addition, it is of a single storey scale and very modest size, with toilets and a small waiting area, to take account of its Green Belt setting.
- 9.20 It is also stated that the site is close to the Trumpington Meadows Country Park and Nature Reserve and also the River Cam, and with this in mind would remain as largely an open car park. Structures have been kept as low as possible and have been sited largely to the northern part of the site to be closer to the M11, to allow openness to be maintained across most of the site and landscaping to be provided to lessen the impact. However, this is considered in more detail below, including changes to the height of the land as part of the submitted proposals.

Harm to the Cambridge Green Belt including visual impact

- 9.21 The applicant's Planning Statement Addendum was produced to address concerns raised about what the level of harm to the openness of the Green Belt would be. This was considered to be pertinent given the location of the site and the edge of the Green Belt and urban boundary, where there is potential for new built development to reduce openness and contribute to urban sprawl. The impact of the proposal on the openness and rural character of the Cambridge Green Belt was therefore considered.
- 9.22 As acknowledged in paragraph 3.5 of the applicant's Planning Statement Addendum the assessment of openness is a planning judgement which is based upon matters of fact and degree. Officers acknowledge that in order to determine the degree of impact on openness of the Green Belt, it is important to understand the Green Belt context. A contextual assessment of the Green Belt functions for each site option under consideration was carried out in the Liz Lake Green Belt Options Assessment (February 2019) on behalf of the applicant.
- 9.23 As set out in the Liz Lake Green Belt Options Assessment document, in the context of openness the south-western edge of the City is defined by a new distinct edge formed by the southern extensions of Trumpington Meadows and Glebe Farm. The M11 also plays a significant role in defining landscape character with associated noise and lighting, which led to their conclusion that Parcel C (the Travel Hub site) was strongly influenced by the M11 corridor, provided a physical separation between the city, and therefore contributed the least to the purposes of including land within the Green Belt compared to the other Green Belt site options considered. However, in the Options Assessment document it is acknowledged that the Travel Hub site itself does have a '*significant contribution in terms of preserving the openness of the Green Belt*' and that '*Development of the parcel beyond the current land use, by its very nature would fail to safeguard the countryside from encroachment resulting in some effects on the openness of the Green Belt*'. Nonetheless it is accepted that '*the degree of effect will be dependent upon the scale of a new building and any associated structures, the extent of lighting and hard surfacing, which to a degree can be influenced by the design process*'.
- 9.24 The site is currently an arable field and whilst not overly prominent in the landscape being bounded by the Trumpington Meadows Country Park and Nature Reserve to the west, the M11 to the north, and Cambridge Road (A10) to the south east, the openness of the area would allow long views across to some neighbouring villages such as Haslingfield and land that runs adjacent to the River Cam, especially if the site is lit at night. A landscape strategy has been designed by the applicant which seeks to minimise the impact of the proposed development in the wider landscape, replacing existing hedgerow and providing additional

native shrub planting, trees and hedgerow as landscape screening. However, whilst such landscaping measures are acknowledged, these measures would not reduce the impact of the proposal or assist with the need to retain the 'openness' of the green belt. Even the applicant acknowledges that *'the proposed development will create significant new built form in the Green Belt and there will be a level of harm to Green Belt openness'*.

- 9.25 In assessing the degree of harm to the Green Belt openness and encroachment into the countryside, officers have considered the landscape and visual impact assessment produced by Mott MacDonald as part of the applicant's environmental assessment, which takes account of the context from the proposed development on the openness and purpose of the Green Belt. The visual impact is accepted by Mott MacDonald in their assessment, particularly that the Travel Hub site will be *'visible in clear and filtered close views from Trumpington Meadows Country Park, local cycle network between Harston and Trumpington and from the A10'* and will in effect introduce a substantial area of new built form within the Green Belt and includes ancillary items which will have a conflict with the openness of that area of Green Belt. The proposals will include the presence of a car park, solar panels above the parking bays, access road off the A10, the multi-user bridge over the M11, the bus route from the site to the existing Trumpington Park and Ride, the service building, boundary fencing, along with associated infrastructure including CCTV and lighting; alongside the amended levels of the site involving a degree of earthworks within the site and the car park being raised above existing ground levels by up to 2 metres (up to 6.56 feet) at their highest point (towards the west of the site). This is considered in more detail in the next section of the officer report, but from a Green Belt perspective the impact on the openness and countryside is acknowledged by planning officers and needs to be placed within the significant weight given to this designation by national and local planning policy.
- 9.26 The GCSP landscape consultant acknowledged that the proposed Travel Hub is recognised as an important development proposal that has followed a structured site-selection and appraisal process and incorporates many positive Green Infrastructure and landscape design approaches that could deliver enhancement of some areas. Nevertheless, as acknowledged in paragraph 6.5 of this report they are of the opinion that it is a proposal that would potentially be harmful to the local landscape character and visual amenity, including impacting upon the purposes and visual openness of the Green Belt. In the GCSP landscape consultant's opinion, the proposal would give rise to a range of adverse landscape and visual effects that whilst on the whole could be mitigated, would also result in some residual effects on visual amenity to users of the local cycle route facilities. The Environmental Statement (ES) acknowledges that there would be adverse landscape and visual effects and that some would be residual, but considers that for the most part, these would be minor and ranked as being not significant in Environmental Impact Assessment (EIA) terms by Year 15. The GCSP landscape consultant confirmed that they did not take a fundamentally different position to that of the applicant in this regard, which is what planning officers have used for the purposes of this assessment.
- 9.27 The GCSP landscape consultant also accepted that whilst in Green Belt terms, the proposed development is considered to be 'not inappropriate' development by the applicant, the proposal is also considered to cause a degree of harm to the openness and purposes of the Green Belt such that the proposal conflicts with the NPPF and Policy NH/8 (Mitigating the Impact of Development in and adjoining the Green Belt). As such, in the GCSP landscape consultant's view, the findings as reported in Chapter 10 and the Addendum do not mean that the development is acceptable or indeed unacceptable when

considered against the relevant policies in the South Cambridgeshire Local Plan, and as such this must be a matter for consideration as part of the overall planning balance.

9.28 SCDCLP (2018) Policy NH/8 sets out the following 3 requirements to mitigate the impact of development in and adjoining the Green Belt:

1. Any development proposals within the Green Belt must be located and designed so that they do not have an adverse effect on the rural character and openness of the Green Belt.
2. Where development is permitted, landscaping conditions, together with a requirement that any planting is adequately maintained, will be attached to any planning permission in order to ensure that the impact on the Green Belt is mitigated.
3. Development on the edges of settlements which are surrounded by the Green Belt must include careful landscaping and design measures of a high quality.

Criterion 1 deals with the openness of the Green Belt, for which the applicant has demonstrated how the proposal has been developed and designed to work in this location. Landscaping and design have also been set out by the applicant and taken into account, so whilst planning officers agree that there is conflict with this SCDCLP (2018) policy and the NPPF (2021) guidance in relation to the purpose and protection of Green Belts, acknowledgement is also made to landscape and design elements that seek to mitigate this as far as possible, as required by criteria 2 and 3 of Policy NH/8.

9.29 CCCLP (2018) Policy 4 (The Cambridge Green Belt) seeks to ensure that new development in the Green Belt will only be approved in line with Green Belt policy in the NPPF (2021), which includes openness. Whilst CCCLP (2018) Policy 8 (Setting of the City) sets out in criterion (a) that development on the urban edge, including sites within and abutting green infrastructure corridors and the Cambridge Green Belt, open spaces and the River Cam corridor, will only be supported where it: responds to, conserves and enhances the setting, and special character of the city, in accordance with the Cambridge Landscape Character Assessment 2003, Green Belt assessments, Cambridgeshire Green Infrastructure Strategy and their successor documents. The reference to Green Belt assessments in criterion (a) refers to the LDA Design Inner Green Belt Study (and supplement) produced to support the local plan, which the applicant's consultants have referenced in their assessment of the Green Belt and the impact of the development on the purposes of the Green Belt.

Green Belt conclusions

9.30 Substantial weight has been given to inappropriate development in the Green Belt by planning officers, that would by definition result in harm as set out in paragraph 148 of the NPPF (2021). This also takes account of the renewable energy infrastructure taken as inappropriate in relation to paragraph 151 of the NPPF (2021). It is noted that the Travel Hub site is located close to the settlement boundary of Hauxton and the wider red line area to the east of the M11 is adjacent to land being developed at Trumpington Meadows. It is also noted that the development would be adjacent to the Trumpington Meadows Country Park and Nature Reserve. However, by its nature, planning officers agree in part with the applicant that this site would have less physical impact upon openness than other uses and that some mitigation is possible through appropriate landscaping. Some limited weight has been given to these considerations in line with consultation responses received from relevant statutory consultees.

9.31 Of more significance, it has been shown through a site selection process by the applicant that the chosen Travel Hub site has been based on Green Belt considerations, as well as meeting the transport objectives being sought to allow a modal shift that can secure a reduction of traffic into the Cambridge city centre and the Cambridge Biomedical Campus, including the Addenbrooke's complex, as well as a reduction of traffic on the M11 Junction 11 interchange. The benefits set out above in paragraph 9.19 are considered to be significant. Planning officers have therefore assessed the 'very special circumstances' and taking into account all the above factors it is therefore considered that very special circumstances have been demonstrated that can outweigh the harm caused by "inappropriateness" and therefore the proposal is considered to be acceptable in Green Belt terms. Therefore, having regard to SCDCLP (2018) Policy S/4 and NH/8; CCCLP (2018) Policy 4 and 8; alongside NPPF (2021) paragraphs 137, 138 and 147 - 151; the proposals are considered to be broadly acceptable in principle, subject to the remaining material planning considerations taken in the overall planning balance ahead of reaching a final decision.

Landscape / townscape and visual impact

9.32 A Landscape and Visual Impact Assessment (LVIA) was submitted by the applicant to set out a study of the landscape character of the area and an assessment of the likely nature and scale of the effects of the proposed scheme on landscape character and visual amenity during construction and operation, including impacts on the landscape and townscape which includes an assessment of the effects on the landscape as a resource in its own right and the visual impact on individual views. The extent of the study area was initially determined by the applicant by digitally mapping the zone of theoretical visibility (ZTV) of the proposed Scheme. The study area for the proposal lies mainly within National Character Area (NCA) 87: East Anglian Chalk. The key characteristics of NCA 87 relevant to the study area that were drawn out by the applicant's submission include:

- The underlying and solid geology is mainly West Melbury Marly Chalk, with distinctive chalk rivers including the Rhee and Granta which flow in gentle river valleys across the NCA. The chalk aquifer is used to supply potable water in the area and supports flows of springs and chalk streams;
- The rolling downland, mostly in arable production, has sparse tree cover but distinctive beech belts along long, straight roads;
- Remnant chalk grassland, including road verges, supports chalkland flora and invertebrates, such as the chalkhill blue butterfly; and
- There are a number of expanding commuter villages generally within valleys.

The study area also includes the eastern edge of NCA 88: Bedfordshire and Cambridgeshire Claylands, but as outlined in the applicant's submission exhibits fewer of its key characteristics. A National Character Area (NCA) is a natural subdivision of England based on a combination of landscape, biodiversity, geodiversity and economic activity. There are 159 NCAs and they follow natural, rather than administrative, boundaries. They are defined by Natural England, the UK government's advisors on the natural environment.

9.33 The importance of the landscape is reflected in national planning guidance with the NPPF (2021) stating that the planning system should contribute to and conserve & enhance the natural and local environment as set out in paragraph 174. In accordance with this theme, SCDCLP (2018) Policy NH/2 (Protecting and Enhancing Landscape Character) sets out that *'Development will only be permitted where it respects and retains, or enhances the*

local character and distinctiveness of the local landscape and of the individual National Character Area in which it is located. CCCLP (2018) Policy 59 (Designing landscape and the public realm) also sets out to ensure that the landscape elements of proposals are well considered and requires the following:

External spaces, landscape, public realm, and boundary treatments must be designed as an integral part of new development proposals and coordinated with adjacent sites and phases. High quality development will be supported where it is demonstrated that:

- a. the design relates to the character and intended function of the spaces and surrounding buildings;*
- b. existing features including trees, natural habitats, boundary treatments and historic street furniture and/or surfaces that positively contribute to the quality and character of an area are retained and protected;*
- c. microclimate is factored into design proposals and that public spaces receive adequate sunlight;*
- d. materials are of a high quality and respond to the context to help create local distinctiveness;*
- e. an integrated approach is taken to surface water management as part of the overall design;*
- f. a coordinated approach is taken to the design and siting of street furniture, boundary treatments, lighting, signage and public art;*
- g. trees and other planting is incorporated, appropriate to both the scale of buildings and the space available;*
- h. species are selected to enhance biodiversity through the use of native planting and/or species capable of adapting to our changing climate; and*
- i. the design considers the needs of all users and adopts the principles of inclusive design.*

- 9.34 In relation to concerns raised as part of the initial consultation exercise, updated and additional information was submitted by the applicant to address the landscape and visual matters raised by the GCSP Landscape consultant. This included landscape design drawing sheets, technical note on updated earthworks information, figures showing the proposed cross sections and distribution of surplus topsoil and subsoil plans, and an addendum to Chapter 10 and Appendix H1 of the ES. Together these documents provided an assessment of the landscape value of the site and surroundings, which recommended measures to mitigate any negative impact from the proposal.
- 9.35 The GCSP landscape consultant noted that the ES and Chapter 10 Addendum confirms that there would be adverse landscape and visual effects, albeit these are ranked in the ES as being not significant in EIA terms. However, the GCSP landscape consultant drew attention to the fact that Policy NH/2 does not refer to significant harm, rather it is a test of new development needing to respect and retain or enhance the local character and distinctiveness of the local landscape and of the individual NCA in which it is located. The GCSP landscape consultant therefore acknowledged that there were a range of adverse impacts concluded in the ES Chapter 10 Addendum (LVIA) that would suggest that the proposed development does not fully meet Policy NH/2. Therefore in their opinion the landscape proposals and commitment to long-term management secured via a Landscape and Ecological Management Plan, might be capable of offsetting some of the harm that would arise from the proposal, albeit the function, landscape character and appearance of this part of the local landscape would be markedly altered.

- 9.36 Following receipt of further information on the earthworks proposals on the Travel Hub site and adjustments made by the applicant to site levels to achieve a better balance of cut and fill material, the GCSP landscape consultant also acknowledged that the proposed creation of 1 metre (3.28 feet) high bunds, the spreading of 450mm (1.48 feet) depth topsoil in the planning beds in the Travel Hub site, and raising of levels by 300mm (0.98 feet) across proposed soft landscape areas is acceptable as an overall principle. However, the GCSP landscape consultant raised a number of comments relating to the suitability of using the topsoil in areas of species-rich grassland and requested further detail and specification in relation to a Soil Strategy and specification for stripping, storage and laying of topsoil to mitigate compaction, to be required by condition should planning permission be granted. The proposed areas of raised levels / bunding would need to be keyed in and smoothly marry to existing contours / landform, avoiding any artificial or engineered landforms that could impact on the visual amenity of this area. Works proposed to remove trees from land adjacent to the existing park and ride site to accommodate the new bus route as part of the wider proposals were also considered, and for the purposes of assessment officers have taken a worst-case-scenario on these all needing to be removed within the urban setting when assessing the visual impact. The impacts of removing, or potentially reducing this section of trees, is also discussed in more detail in the residential amenity section of this report (paragraph 9.111).
- 9.37 In addition to the points raised above, the GCSP landscape consultant also confirmed that they continue to raise a design issue with the layout of part of the shared user path and the adjoining access road that *'unfortunately results in a lack of meaningful landscape treatment and poor amenity for users of the path where they pass through the main part of the travel hub site'* in their opinion. The applicant acknowledged that the route of the path meant that a narrowing of landscaping was necessary in order to meet wider requirements such as drainage matters and that the path width was retained in line with local standards. Even with this design feature leading to a pinched layout along the eastern side of the non-motorised user (NMU) path, the applicant has confirmed that the landscaping proposed in this area would still be in the region of 0.5 metres (0.55 yards) and would therefore not be unacceptable in landscape design standards. Planning officers are of the view that the retention of the path width and wider constraints that have led to this decision by the applicant, make this reduction in landscaping acceptable, whilst acknowledging the concerns raised by the GCSP landscape consultant and the need to balance out all the material planning elements in making a final decision.
- 9.38 Planning officers acknowledge that the NMU shared user path pinches very close to the western edge of the proposed access road and perimeter road around the car park, where the verge tapers from 0.5 metres (0.55 yards) to 1.5 metres (1.64 yards) in width allowing grass and some tree planting to the wider areas, but also accommodating lighting columns (that have the potential to conflict with the tree locations in the south if not designed carefully at the final design stage) and road/pavement kerbs etc. As noted in paragraph 9.37 above, planning officers acknowledge that this space would provide a reduced edge treatment and buffer to the NMU path, where users could be exposed to close proximity views, noise and pollution from the adjoining vehicles. However, the applicant has confirmed that the route of the path has taken account of wider sensitivities, such as drainage matters, wildlife constraints in existing trees, whilst also considering the desire lines for cycling, which means that its alignment has been brought more into the more open parts of the proposal. In this regard, Viewpoint 6A of the LVIA is pertinent (albeit slightly further south along the path) which planning officers have considered following the response from the GCSP landscape consultant. From here, the GCSP landscape consultant confirmed that there would be more open views than those that appear to have

been considered in the assessment. Notwithstanding this, the GCSP landscape consultant confirmed that the LVIA concludes that those views would be subject to a major adverse magnitude of change during operation and residual (resulting in a moderate adverse significance of effect). In the round, the GCSP landscape consultant considered this to be a fair overall judgement. Clearly some localised improvement could have been achieved had more space for landscape treatments been made available in the layout in their opinion, but no objection was made to the proposals.

- 9.39 In providing their assessment of the applicant's proposal, the GCSP landscape consultant provided as a general comment, that they considered that similar to Chapter 10 of the ES, the Addendum provided in line with their concerns raised is largely clear and concise, which is to be welcomed. The methodology is considered to be generally compliant with the thrust of the guidance in the Design Manual for Roads and Bridges, and where appropriate, the third edition of the Guidelines for Landscape Visual Impact Assessment, and the minor queries that they previously raised have been addressed.
- 9.40 Whilst acknowledging that the proposals do not fully meet SCDCLP (2018) Policy NH/2 and CCCLP (2018) Policy 59, the landscape proposals and commitment to long-term management secured via a Landscape and Ecological Management Plan, are considered by planning officers to be capable of offsetting some of the harm that would arise from the proposal, albeit the function, landscape character and appearance of this part of the local landscape would be markedly altered as acknowledged by guidance provided by the GCSP landscape consultant as a statutory consultee. As such, planning officers have acknowledged this conflict in the planning balance, alongside the Cambridge Green Belt issues set out above, to be weighed together before reaching a final conclusion.

Heritage considerations, including the setting of the City of Cambridge

- 9.41 Chapter 16 of the NPPF (2021) seeks to conserve and enhance the historic environment. Paragraph 194 of the NPPF (2021) requires in *'determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'*. Furthermore, paragraph 197 of the NPPF (2021) requires *'In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness'*.
- 9.42 In addition to the national guidance set out in the NPPF (2021) above, SCDCLP (2018) Policy NH/14 (Heritage Assets) sets out that *'Development proposals will be supported when they sustain and enhance the significance of heritage assets, including their settings, as appropriate to their significance and in accordance with the National Planning Policy Framework, particularly: c. Designated heritage assets, i.e. listed buildings, conservation areas, scheduled monuments, registered parks and gardens; d. Non-designated heritage assets including those identified in conservation area appraisals, through the development process and through further supplementary planning documents; e. The wider historic landscape of South Cambridgeshire including landscape and settlement patterns; f. Designed and other landscapes including historic parks and gardens, churchyards, village greens and public parks; g. Historic places; h. Archaeological remains of all periods from*

the earliest human habitation to modern times'. CCCLP (2018) Policy 61 (Conservation and enhancement of Cambridge's historic environment) also sets out to ensure that the historic environment is protected stating that 'To ensure the conservation and enhancement of Cambridge's historic environment, proposals should: a. preserve or enhance the significance of the heritage assets of the city, their setting and the wider townscape, including views into, within and out of conservation areas; b. retain buildings and spaces, the loss of which would cause harm to the character or appearance of the conservation area; c. be of an appropriate scale, form, height, massing, alignment and detailed design which will contribute to local distinctiveness, complement the built form and scale of heritage assets and respect the character, appearance and setting of the locality; d. demonstrate a clear understanding of the significance of the asset and of the wider context in which the heritage asset sits, alongside assessment of the potential impact of the development on the heritage asset and its context; and e. provide clear justification for any works that would lead to harm or substantial harm to a heritage asset yet be of substantial public benefit, through detailed analysis of the asset and the proposal'.

- 9.43 As part of the applicant's submission, heritage matters were included in Chapter 9 of the Environmental Statement 'Historic Environment', where both temporary and permanent construction and operational effects on heritage assets were considered in the assessment. Temporary effects were considered from the construction-related activities, whereas permanent effects were considered as either physical effects on the integrity of the asset or effects on their setting, which includes the setting of the City of Cambridge. Baseline information was gathered from within a 1km study area around the Scheme area to establish the archaeological potential and undertake historic environment assessment within. The study area used seeks to provide a comprehensive assessment of designated and non-designated heritage assets that might be directly or indirectly affected either physically or through changes to their setting to aid the decision-making process in this regard. Whilst outside of the 1km study area the Grade I listed Church of St Mary and St Michael, Trumpington was also included in the applicant's assessment based on comments received from Historic England at the pre-application stage back in April 2019 relating to potential low-level harm to the Grade I listed Church of St Mary and St Michael, Trumpington, as a result of development to the south of the asset.
- 9.44 In assessing the applicant's Environmental Statement (ES), Historic England acknowledged that the site is situated midway between three scheduled monuments (Noted in the Environmental Statement as MM001, MM002 and MM003) and close to a number of other heritage assets including the Grade I listed church of St Edmund at Hauxton (MM004) and the Grade I listed Church of St Mary and St Michael at Trumpington. Historic England noted the ES and the underpinning Desk Based Assessment (DBA) have assessed these assets and agreed that the weighting given was appropriate. The churches have high heritage values and the scheduled monument form an important group of designated buried archaeological remains. They also noted the impact upon the Church in Trumpington was included in the assessment following their previous advice and that further discussion was undertaken with regards to the safeguarding of the two grade II milestones. Overall, they noted the results of the impact assessment in relation to the designated heritage assets and did not wish to make any further comments in that regards. As such, they confirmed that Historic England does not object in principle to the scheme.
- 9.45 Whilst confirming they did not object to the scheme, in providing their response Historic England confirmed that their one concern was that three designated assets (Scheduled Monuments) are evenly spaced around the area with the development roughly in the centre. In recent years the amount of development in the wider area has provided an

unprecedented level of information about the historic landscape. They were very much of the view that there was clearly an important multi-period landscape in this area of which some discreet areas are designated, whilst much remains undesignated. As a landscape they felt it needed to be considered more holistically and although mitigation by excavation and preservation by record is an appropriate response to the non-designated archaeological assets within the red line boundary, their view was that the applicant's ES lacked a broader level of understanding of the historic landscape. In dealing with assets only as individual sites does not establish the value of synthesis. They therefore confirmed that they would value further comment from the applicant as to how they plan to bring this matter to the fore, and how they will seek to balance the impact upon the heritage assets from the proposal. In particular, how they would seek to develop an understanding of the finding of the archaeological discoveries made as part of the work, linked to this wider archaeological landscape amongst the future users of the development.

- 9.46 To address the points made by Historic England in paragraph 9.45 above, the applicant's consultant provided an updated heritage and archaeological section in their resubmission. This acknowledged the importance of not only addressing the archaeology as per individual sites, but also for placing these sites within a wider archaeological and historic landscape context. They also referenced their technical appendix to the ES that sort to show this wider context and how the Travel Hub site is framed by the wider landscape. They confirmed that the research carried out across the immediate surrounding area was pertinent and was engaged with to inform the baseline for the assessment. Moreover, going forward they confirmed this baseline, in addition to the results of the pre-construction archaeological excavation, will be disseminated as part of a series of interpretation / information boards across the Scheme for end users to engage with the wider archaeological context. While the content of the information to be presented on the boards is yet to be confirmed, the idea was raised by, and discussed with, the Historic Environment Team at the County Council which is being secured by planning condition. Whilst the consideration of archaeology is discussed further in the next section of the report below, the Historic Environment Team has confirmed their support for this approach; and upon receipt of the additional information, Historic England confirmed that they did not have any additional comments, but suggested that officers continued to seek the views of specialist conservation and archaeological advisors, in particular with regards to the requirement for archaeological works and mitigation.
- 9.47 To ensure that the wider historic setting of the City of Cambridge was also given sufficient consideration in line with adopted local planning policies set out above, specialist advice was also sought from heritage colleagues via the GCSP team. As discussed in paragraph 6.10 of this report, confirmation was received that acknowledged that their comments did not address the archaeological aspects of the historic landscape that had already been dealt with by Historic England and the County Council's Historic Environment Team. However, regarding potential impacts on the setting of Cambridge City, they confirmed the site's parking area location being beyond the M11 and south of Trumpington's historic core of settlement, is sufficiently distant from the Cambridge historic core that given the nature of development proposed on the Travel Hub site, there is no visual impact on the historic core. In terms of the wider setting of the city, the proposed Travel Hub site will result in a change to the landscape character from the loss of farmland. However, in their opinion this area of farmland concerned is not known to make a particular contribution to the setting of the city in heritage terms (notwithstanding archaeology) and the development is likely to be perceived as part of the M11 infrastructure. Furthermore, given that the designated heritage Listed buildings of Hauxton Mill nearby to the south, are largely protected by woodland and the site proposals being across the A10 to its North, the increase in vehicle activity in the

vicinity should not harm its setting in their opinion. Safeguarding of the two grade II Listed milestones were considered to be the most important considerations that needed to be protected during the construction stage. As such, no concerns were raised in relation to the scheme on heritage grounds.

- 9.48 As demonstrated by the responses received by Historic England, the Council's Historic Environment Team and the GCSP Heritage Officer, the relevant information has been submitted to allow a decision to be taken in line with both national guidance and local planning policies.
- 9.49 Planning officers consider that sufficient information has been provided by the applicant to ensure that consideration of these points can be made. With the additional clarification and information supplied by the applicant to address the points raised, planning officers consider that the proposals address the national requirements and are in compliance with SCDCLP (2018) Policy NH/14 (Heritage Assets) and CCCLP (2018) Policy 61. Furthermore, with the mitigation measures secured, which includes the interpretation of the wider context of the historic environment (considered further below), officers are of the view that this has a potential benefit that should be acknowledged in the final planning balance.

Archaeology

- 9.50 In addition to the historic environment considerations above, the Council's Historic Environment Team drew attention to paragraph 185 [now 190] of the NPPF which states that heritage features within a development site should be protected. SCDCLP (2018) Policy NH/14 (Heritage Assets) and CCCLP (2018) Policy 61 (Conservation and enhancement of Cambridge's historic environment) both set out in the previous section of this report support this. A field archaeological evaluation took place in August 2019 by the applicant, finding occupation evidence of Iron Age date (c. 6th - 4th century BC) and a small Anglo-Saxon cemetery of 6th-7th century AD date (ref: Cox, N. 2020 Cambridge South-West Travel Hub, M11 Junction 11. Archaeological Evaluation Report Oxford Archaeology report no 2372. Cambs Historic Environment Record reference ECB5966). Subsequent discussions between the Council's Historic Environment Team and the archaeological consultants from Mott MacDonald have refined a mitigation scheme that will be required in advance of any development in this area.
- 9.51 Archaeological investigations have been undertaken on site, and whilst the Council's Historic Environment Team does not object to this development, it is recommended that the mitigation strategy is secured by the use of a planning condition. With the benefit of a planning condition to secure this requirement, the proposal is considered to be in full compliance with national guidance set out in the NPPF (2021) and SCDCLP (2018) Policy NH/14 and CCCLP (2018) Policy 61.

Protection of Lord's Bridge Radio Telescope

- 9.52 SCDCLP (2018) Policy TI/7 (Lord's Bridge Radio Telescope) seeks to ensure that development is not granted that would result in any risk of interference to the Mullard Radio Astronomy Observatory at Lord's Bridge. The policy sets out two consultation area requirements based on the Policies Map (Lord's Bridge Consultation Area 1 – that requires consultation with the University of Cambridge and account taken to the risk of interference to the equipment being used in the Observatory, with permission being refused where interference caused could not be overcome by conditions or planning obligations; and Lord's Bridge Consultation Area 2 – that requires development proposals for

telecommunications and microwave operations that could adversely affect the operation of the Mullard Radio Astronomy Observatory at Lord's Bridge will be subject to consultation with the University of Cambridge, with permission being refused where interference could not be overcome by conditions or planning obligations). The Travel Hub site is within Lord's Bridge Consultation Area 1 for the purposes of SCDCLP (2018) Policy TI/7 and consultation has taken place with the University of Cambridge

- 9.53 CCCLP (2018) Policy 39 (Mullard Radio Astronomy Observatory, Lord's Bridge) also seeks to ensure that development proposals within the Lord's Bridge Consultation Area, covering the whole of Cambridge City Council's administrative area, which could adversely affect the operation of the Mullard Radio Astronomy Observatory will: a. be subject to consultation with the University of Cambridge; and b. only be granted planning permission where there is no harm to its scientific operation or where any harm can be overcome by measures secured by condition or planning obligation.
- 9.54 Both local policies acknowledge the international importance of Lord's Bridge and the need to ensure that it is protected from inappropriate development. In recognition of this protection the applicant undertook pre-application discussions with the University of Cambridge to ensure that the design being brought forward would be possible and demonstrated how their advice had been included in the planning application; which is acknowledged in the University's response set out in paragraph 6.36 of this report.
- 9.55 The University of Cambridge (Estates Team) confirmed that they were comfortable that the designs have been prepared such that, provided they are implemented in the form shown, they will not pose a threat to the Lord's Bridge facility. However, they have requested that any changes to the scheme, such as lighting design or heights / materiality of the proposed structures etc. should trigger additional consultation with them to ensure their advice holds weight. Furthermore, further consultation should take place with regard to the emerging technical designs before they become embedded within the scheme, such as the convertors to be incorporated within the solar array and communication with buses etc. so that any required mitigation to control radio interference / suppression measures etc. can be incorporated within the design as it develops.
- 9.56 On the basis that both a planning condition and informative are recommended to safeguard the points raised by the University of Cambridge, the proposal is considered to align with the principles set out in SCDCLP (2018) Policy TI/7 and CCCLP (2018) Policy 39.

Ecology and Biodiversity

- 9.57 Paragraph 180(d) of the NPPF (2021) requires proposals to demonstrate a net gain in biodiversity on the site and sets out that '*development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity*'.
- 9.58 SCDCLP (2018) Policy NH/4 supports development which preserves and enhances biodiversity with opportunities to be taken to achieve positive gain from the design of the development with priority given to those sites which assist in the achievement of targets in the Biodiversity Action Plans (BAPs) and aid delivery of the Cambridgeshire Green Infrastructure Strategy. SCDCLP (2018) Policy NH/6 (Green Infrastructure) seeks to ensure that green infrastructure in the district is conserved and enhanced to ensure that there is no loss or harm to the network unless the need and benefits of the development demonstrably

outweigh any adverse impacts; that proposals to reinforce, link, buffer and create new infrastructure will be encouraged; the delivery of strategic green infrastructure and priorities will be supported; and that new developments contribute to the enhancement of the green infrastructure network, where contributions will be established for the enhancement and on-going management costs. Furthermore, in the surrounding context of the Travel Hub site the Cambridge Southern Fringe Area Action Plan (2008) sets out the implementation of a Countryside Enhancement Strategy (which led to the creation of the Trumpington Meadows Country Park and Nature Reserve) and for the Travel Hub site itself Policy CSF/5 1(b) to (e) seeks the following:

- b) Hedgerow planting on field boundaries in the agricultural land between Hauxton Road and the Trumpington Meadows Country Park;
- c) New footpaths, cyclepaths and bridleways creating routes through the area from Hauxton Mill and linking to the Granchester Road;
- d) Measures to protect and enhance wildlife habitats, including managed public access to the river banks; and
- e) Noise attenuation on the northern side of the M11 through the creation of new landscape features which are compatible with the river valley character.

- 9.59 CCCLP (2018) Policy 69 (Protection of sites of biodiversity and geodiversity importance) seeks to protect existing local nature sites and where permission is permitted proposals must include measures to (a) minimise harm; (b) to secure achievable mitigation and/or compensatory measures; and (c) where possible enhance the nature conservation value of the site affected through habitat create, linkage and management. Whilst the Travel Hub site is not a site of biodiversity, it is adjacent to the Trumpington Meadows Country Park and Nature Reserve, which does need to be considered in the planning balance. As set out in supporting text to CCCLP (2018) Policy 69 *‘Proposals on or adjacent to a site of local conservation importance should not be granted without proper consideration of the potential to enhance the designated site’s biodiversity through enhanced management, habitat creation or the formation of new linkages with adjacent habitat areas’*.
- 9.60 CCCLP (2018) Policy 70 (Protection of priority species and habitats) is also relevant, where it states that *‘Development will be permitted which: a. protects priority species and habitats; and b. enhances habitats and populations of priority species’* and also CCCLP (2018) Policy 71 (Trees) that seeks to preserve, protect and enhance existing trees including the protection of potential root damage to trees of amenity or other value. Furthermore, The Greater Cambridge Sustainable Design and Construction Supplementary Planning Document (January 2020) includes a section on Biodiversity and Geodiversity (Section 3.5) which sets out why biodiversity is an essential part of sustainable development and the conservation and enhancement of biodiversity should be considered as a key element of good design. Both the 2018 Cambridge and South Cambridgeshire Local Plans, alongside national planning policy in the NPPF (2021), requires new development to protect and enhance biodiversity, giving consideration to the conservation status of species and habitats and recognising the role that a multifunctional approach to the design of developments has to play in helping to enhance biodiversity. Net biodiversity gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand; and development that adopts a biodiversity net gain approach seeks to make its impact on the environment positive, delivering improvements through habitat creation or enhancement after avoiding or mitigating harm as far as possible. Consideration also needs to be given to the guidance in the Biodiversity (July 2009), Trees and Development Sites (January 2009) and District Design Guide (March 2010) supplementary planning guidance documents. However, given the age of the guidance documents very

limited weight has been afforded to them by officers, and the weight has instead been placed on the adopted local plan policies and guidance in the Greater Cambridge Sustainable Design and Construction Supplementary Planning Document (January 2020) and NPPF (2021) highlighted above.

- 9.61 To help support the proposals and demonstrate consideration of the protection afforded by both national and local planning policies the applicant submitted a Phase 1 ecology survey together with a Landscape and Ecological Management Plan (Mott Macdonald, 28 May 2020). Whilst further information and discussions needed to take place with the Ecology Officers from the County and District, alongside wider ecology groups, planning officers are content that all statutory consultee holding objections have been removed and subject to final design confirmation, the proposals are able to create appropriate biodiversity net gain to meet the requirements of both national and local planning policy. The mitigation measures set out in the Letter of Comfort dated 19 July 2021 and the pre-commencement conditions recommended to ensure the final details are agreed ahead of construction, ensure that the environmental net gain benefits are controlled and deliverable to protect the adjacent Trumpington Meadows Country Park and Nature Reserve.
- 9.62 Representations have been made regarding the loss of biodiversity from development of the site which comprises three arable fields. These concerns have been considered, and whilst the proposal would result in the loss of the existing fields the applicant has provided details which demonstrate that the proposal would also support and increase biodiversity on site. This would include the principles of reinstatement of native hedgerow species such as Hawthorn, Blackthorn and Field Maple around all site boundaries, the provision of ecological enhancement areas such as habitat areas, and tree planting across the site which would widen the diversity of vegetation at the site and provide micro habitats for species such as birds and insects. NPPF (2021) paragraph 180(d) encourages ecological enhancements which would provide a net gain in biodiversity on site. The applicant's ecologist has provided details of the proposed net gain, the principles of which will be used to inform the final designs. The CCC Ecology Officer has confirmed that the landscaping and mitigation proposed would ensure ecological enhancements at the site would provide a net gain in biodiversity on the site. However, to ensure that an appropriate baseline is agreed and that any changes to the final designs are used as a basis for this to be measured, a pre-commencement condition has been recommended to allow for any final changes to be made (if necessary) in line with the approved details set out in draft condition 3.
- 9.63 Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites and they are generally supportive of the biodiversity mitigation and enhancement proposals detailed in the Landscape and Ecological Management Plan (Mott Macdonald, 28 May 2020). However, they advised that delivery of the proposed measures should be secured through appropriate planning conditions.
- 9.64 In considering the ecology and biodiversity impacts and mitigation measures put forward by the applicant to achieve a net gain in biodiversity, in line with both national and local planning policies, planning officers have also considered the potential pressures placed on the adjacent Trumpington Meadows Country Park and Nature Reserve (outside of the red line planning application area), resulting from placing a Travel Hub in this location. To help inform these considerations planning officers have undertaken discussions with a representative from the Wildlife Trust and the County Council's Ecology Officer, to ensure that a full appreciation of the concerns were understood; and the inclusion of the Letter of

Comfort dated 19 July 2021 has been brought forward as a result of this assessment to ensure that appropriate mitigation and monitoring is secured if planning permission is granted. Further detail on the final ecology and biodiversity (linked in with the landscaping schemes to be delivered) have been controlled by the draft planning conditions proposed by planning officers (that have been accepted by the applicant's planning agent) which will be informed by the final scheme designs and highway improvements to further safeguard the delivery of these improvements and long-term maintenance plans for the benefit of the natural environment.

- 9.65 In line with the Cambridge Southern Fringe Area Action Plan (2008) the applicant has also sought to demonstrate compliance with Policy CSF/5 1(b) to (e) in proposing the retention of existing hedgerow where possible; the creation of the new NMU route that can be used as a bridleway to connect the area from Hauxton Mill to Granchester Road; putting measures in place to protect and enhance wildlife habitats, including providing mitigation to land outside the red line boundary area to manage public access to the river banks; and ensure that the Noise attenuation created on the northern side of the M11 is retained and re-profiled to allow for the bus route, whilst maintaining the height and approved profiles agreed under S/2501/16/DC Discharge of Condition 50 (parts e and g – earth bund) of outline planning consent S/0054/08/O (Approved May 2016). In the officer report for S/0054/08/O the principle of maximising the disposal of spoil arisings on site in an earth bund positioned on the boundary with the M11 is discussed, which acknowledged that the contours of the bunds extended towards the adjacent footpath with approved heights of up to 3.5 metres (11.48 feet) above surrounding land levels. What is being proposed by the applicant is consistent with this wider approval, but to ensure that this is confirmed in any final amendments that may come out of the final designs, this information will be required through the landscaping information. Furthermore, to ensure that the concerns raised by Deloitte on behalf of Grosvenor Britain & Ireland (Grosvenor) and Universities Superannuation Scheme (USS) as landowners, in relation to the bunds, access to swales and re-instatement of the existing path down to the river for the drainage route proposed, safeguards are proposed in draft conditions 5 and 9 to ensure that these aspects are adequately controlled.
- 9.66 Whilst it is acknowledged that the long term maintenance of the proposals will be undertaken by the applicant through a commercial contract that will be let outside the remit of this planning application, which means that we cannot assume that it will be the Wildlife Trust managing this Travel Hub site, it does still need to be designed to complement the neighbouring land uses. As such, irrespective of who will be the successful management body, the proposed planning conditions, with the benefit of the applicant's Letter of Comfort dated 19 July 2021, are considered necessary, directly related to the development and reasonably related in scale and kind to meet tests for planning conditions set out in paragraph 57 of the NPPF (2021). In ensuring that such arrangements are put in place, planning officers consider that the long-term arrangements and mitigation measures sought by SCDCLP (2018) Policy NH/6 (Green Infrastructure) are appropriately controlled by the recommendations set out in this officer report.
- 9.67 Officers acknowledge the ecological enhancements to improve biodiversity on site and the demonstration of net gain to meet the minimum 10% required by planning policy. Furthermore, with the setting of a baseline biodiversity net gain assessment and further monitoring over the next 25 years (with a habitat monitoring scheme and reports submitted in years 2, 5, 10, 20 and 25 years, with remedial actions required if the desired outcomes are not achieved) as part of the proposed draft Landscape Ecological Management Plan (LEMP) condition, planning officers acknowledge as part of their planning balance that it is

likely that the proposals will exceed this minimum and have the potential to deliver real benefits to this area. As such it is considered that with the mitigation measures sought, the proposals are in compliance with SCDCLP (2018) Policies NH/4 and NH/6; CCCLP (2018) Policies 69, 70 and 71; Southern Fringe Area Action Plan (2008) Policy CSF/5 1(b) to (e); paragraph 180(d) of the NPPF (2021); and guidance in the Greater Cambridge Sustainable Design and Construction Supplementary Planning Document (January 2020). As such, subject to careful design and management controlled by the recommended draft planning conditions and the Letter of Comfort dated 19 July 2021 put forward by the applicant, planning officers consider the opportunities for biodiversity net gain and wider access to the neighbouring Trumpington Meadows Country Park and Nature Reserve should be seen as a benefit in the planning balance exercise.

Best and most versatile Farmland

- 9.68 SCDCLP (2018) Policy NH/3 states that planning permission would not be granted for development which would lead to the irreversible loss of Grades 1-3a of agricultural land unless sustainability considerations and the need for development are sufficient to override the need to protect the agricultural value of the land (NH/3(1)(b)). Whilst paragraph 174 of the NPPF (2021) seeks to protect, conserve and enhance the natural environment by setting out the following:

Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

- 9.69 From the Planning Statement (Strutt and Parker, May 2020) the applicant acknowledges that the proposed development would result in the loss of approximately 33 hectares (81.5

acres) of Best and Most Versatile (BMV) agricultural land. The majority of which they confirm is Grade 2 Agricultural Land with a small portion of the overall site (approximately a third of the size of the southernmost field) is Grade 3 Agricultural Land (see Agenda Plan 4). The need for the development has been set out by the applicant and this is demonstrated in paragraphs 9.2 – 9.4. The applicant also notes that South Cambridgeshire has a significant resource of good quality agricultural land, particularly around Cambridge and the larger settlements which is where the most sustainable growth for development is located.

- 9.70 As already noted above, the proposal site would lead to the irreversible loss of approximately 33 hectares (81.5 acres) of Grade 2 and 3 agricultural land, which must be assessed against both national and local planning policy. Natural England notes the loss of this BMV agricultural land for this development, and as acknowledged in paragraph 6.22 of this report, they highlighted their response to the EIA Scoping consultation (Natural England ref 289486) for this development where they advised that impacts to BMV land should be appropriately considered in light of the Government's policy for the protection of the BMV agricultural land as set out in paragraph 174 of the NPPF (2021). In terms of EIA, BMV land (Grades 1,2 and 3a in the Agricultural Land Classification system) is a receptor of very high or high sensitivity (depending on the ALC grades present) and the loss of 20 ha (or more) of BMV agricultural land would typically give rise to a major (or v large/large) adverse impact (according to DMRB LA104/109 or EIA Handbook 3rd Edition significance methodologies) depending upon the amount of the different ALC grades affected and any mitigating circumstances in their opinion. As such they recommended that soils should be considered in the context of the sustainable use of land and the ecosystem services they provide as a natural resource, as also highlighted in paragraph 174 of the NPPF. They emphasised that this information has not been provided within the Environmental Statement. However, as also noted in paragraph 6.22 of this report Natural England has accepted that this was as a result of planning officers not scoping BMV into the EIA rather than this being an omission by the applicant. As such, it is for the Council to demonstrate consideration of this matter in their planning balance to comply with paragraph 174 of the NPPF.
- 9.71 Officers have followed the guidance set out in Annex A of Natural England's response in relation to BMV land and have ensured a map of the ALC was sought to better understand the impacts of the proposed scheme. Having reviewed this in discussion with Natural England colleagues (noting that Grade 2 agricultural land is predominant in the area), and that the irreversible loss of agricultural land has been based on sustainability considerations and the need for development as set out in paragraphs 9.2 to 9.4, and the key benefits identified in paragraphs 9.19 and 9.20 that are considered sufficient to override the need to protect the agricultural value of the land (NH/3(1)(b)), officers consider the proposal is broadly compliant with policy NH/3 of the SCDCLP (2018) and in particular NH/3 (1)(b). Furthermore, sufficient evidence has been reviewed to demonstrate consideration of paragraph 174 of the NPPF where criterion (a) requires the protection and enhancement of *valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)*; criterion (b) requires recognition of the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic *and other benefits of the best and most versatile agricultural land*, and of trees and woodland; criterion (e) requires the prevention of new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, *unacceptable levels of soil, air, water or noise pollution or land instability*; and criterion (f) requires the remediation and mitigation of *despoiled, degraded, derelict, contaminated and unstable land, where appropriate*. As such, subject to the proposed draft Soil Strategy Plan

condition, discussed with Natural England colleagues, planning officers are content that the sustainable measures and need for development have been assessed appropriately to demonstrate compliance with both national and local planning policy.

Transport and parking considerations, including consideration of COVID-19 on travel patterns and transport modelling for the proposal

- 9.72 The NPPF (2021) requires that plans and decisions ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised, and that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts of development on the road network are severe in line with NPPF paragraph 111.
- 9.73 SCDCLP (2018) Policy TI/2 (Planning for Sustainable Travel) supports sustainable modes of transport, particularly for larger developments together with a subsequent reduction in car usage. The full requirements of the policy are reproduced below for ease of reference:
- 1. Development must be located and designed to reduce the need to travel, particularly by car, and promote sustainable travel appropriate to its location.*
 - 2. Planning permission will only be granted for development likely to give rise to increased travel demands, where the site has (or will attain) sufficient integration and accessibility by walking, cycling or public and community transport, including:*
 - a. Provision of safe, direct routes within permeable layouts that facilitate and encourage short distance trips by walking and cycling between home and nearby centres of attraction, and to bus stops or railway stations, to provide real travel choice for some or all of the journey, in accordance with Policy HQ/1;*
 - b. Provision of new cycle and walking routes that connect to existing networks, including the wider Rights of Way network, to strengthen connections between villages, Northstowe, Cambridge, market towns, and the wider countryside;*
 - c. Protection and improvement of existing cycle and walking routes, including the Rights of Way network, to ensure the effectiveness and amenity of these routes is maintained, including through maintenance, crossings, signposting and waymarking, and, where appropriate, widening and lighting;*
 - d. Provision of secure, accessible and convenient cycle parking in accordance with Policy TI/3; e. Securing appropriate improvements to public and community transport (including infrastructure requirements) in accordance with the aims of the Cambridgeshire Local Transport Plan and South Cambridgeshire Community Transport Strategy.*
 - 3. Developers will be required to demonstrate they will make adequate provision to mitigate the likely impacts (including cumulative impacts) of their proposal including environmental impacts (such as noise and pollution) and impact on amenity and health. This will be achieved through direct improvements and Section 106 contributions and/or the Community Infrastructure Levy (CIL), to address transport infrastructure in the wider area including across the district boundary.*

4. Developers of 'larger developments'¹ or where a proposal is likely to have 'significant transport implications'² will be required to demonstrate they have maximised opportunities for sustainable travel and will make adequate provision to mitigate the likely impacts through provision of a Transport Assessment and Travel Plan. All other developments will be required to submit a Transport Statement. Where a Transport Assessment / Statement or Travel Plan is required, a Low Emissions Strategy Statement should be integrated.

5. Travel Plans must have measurable outputs, be related to the aims and objectives in the Local Transport Plan and provide monitoring and enforcement arrangements. Planning obligations may be an appropriate means of securing the provision of some or all of a Travel Plan, including the requirement for an annual monitoring and progress report. Submission of area-wide Travel Plans will be considered in appropriate situations. Outline planning applications are required to submit a framework for the preparation of a Travel Plan.

9.74 SCDCLP (2018) Policy TI/3 (Parking Provision) seeks to ensure that car and cycle parking and related infrastructure e.g. electric charging point facilities are provided through a design led approach in line with the indicative standards set out in Figure 11 of the local plan. Criterion 2 of the policy requires that car parking provision needs to '*take into consideration the site location, type and mix of uses, car ownership levels, availability of local services, facilities and public transport, and highway and user safety issues, as well as ensuring appropriate parking for people with impaired mobility*'.³ Whilst Criterion 3 of the policy confirms that the '*Council will encourage innovative solutions to car parking, including shared spaces where the location and patterns of use permit, and incorporation of measures such as car clubs and electric charging points*'.

9.75 CCCLP (2018) Policy 5 (Sustainable transport and infrastructure) has similar objectives to Policy TI/2 above. Whilst CCCLP (2018) Policy 82 (Parking Management) sets out parking standards in line with Policy TI/3 above. Colleagues in the Transport Assessment Team have considered the policy context when considering the transport information submitted as part of these proposals.

9.76 The Travel Hub site is proposed to comprise on-site car parking provision of 2,150 car parking spaces inclusive of 1,934 standard spaces, 108 designated Blue-Badge spaces, 670 solar carport spaces with ducting over the whole Travel Hub to allow the expansion of solar carports in the future if desired, and 108 'Slow EV' charging points.

9.77 The methodology to determine car parking provision is considered acceptable for use by the CCC Transport Assessment Team. It is proposed that in the opening year of 2023, the Travel Hub site will initially provide 326 cycle parking spaces inclusive of 160 cycle parking spaces in the form of Sheffield stands, 16 cycle parking spaces for non-standard cycles, and 150 cycle parking lockers. It is noted land will be safeguarded at the Travel Hub site to allow for on-site cycle parking provision to be expanded in the future to a maximum

¹ Larger development includes proposals of over 20 dwellings or 0.5 hectares for residential development and over 1,000m² or 1 hectare for other development.

² Developments with 'significant transport implications' are those: In particularly congested locations and/or generating larger numbers of trips; Where there are particular local travel problems; That will have an adverse impact on an existing, or will result in the declaration of new, Air Quality Management Area or an unacceptable adverse impact on local air quality.

³ Minimum levels of car parking for people with impaired mobility will be required in accordance with national guidance.

provision of 538 cycle parking spaces inclusive of 204 cycle parking lockers. Cycle parking at the Travel Hub site is estimated to initially operate at 87% capacity. The initial on-site cycle parking provision is expected to cover the demand for spaces. On-site cycle parking provision will be monitored and managed and if additional cycle parking spaces are required, it is noted these will be delivered by the applicant. The applicant is happy to accept a 'monitor and manage' planning condition regarding the provision of on-site cycle parking should planning permission be granted.

- 9.78 In terms of the transport baseline data the Local Highway Authority has confirmed that they are satisfied with the baseline data obtained and used within the submitted transport assessment. The localised network peak periods identified as 07:00 - 08:00 in the AM peak and 17:00 - 18:00 in the PM peak are agreed by the CCC Transport Assessment Team; as are the 2018 baseline traffic flow diagrams for the AM and PM peaks. Assessment of collision data analysis has also been considered based on 60 months' worth of available access data obtained from the Council, based on the study area agreed by colleagues in the Transport Assessment Team. No accident cluster sites were identified that needed to be considered as part of this planning application.
- 9.79 The methodology used to determine the proposed trip rate for cars at the new Travel Hub site is considered acceptable by the CCC Transport Assessment Team, where the Travel Hub site is anticipated to generate 497 trips in the AM peak (495 inbound and 2 outbound) and 470 trips in the PM peak (11 inbound and 459 outbound). Transport officers have confirmed that the occupancy profiles and parking demand provided by the applicant's consultants are considered acceptable. It is noted that in the 2036 High Growth Scenario, maximum usage of the Travel Hub site car park is anticipated to reach 84% of its total capacity.
- 9.80 In assessing the proposals the Transport Assessment Team has noted in 2026 the proposed distributional split between the Travel Hub site and the existing Trumpington Park & Ride site will be 61% - 39% respectively; whilst in 2036 the proposed distributional split between the Travel Hub site and existing Trumpington Park & Ride will be 60% - 40% respectively, which is considered acceptable by the CCC Transport Assessment Team. At maximum occupancy, the Travel Hub site is anticipated to generate 510 boarders and 27 alighters in the AM peak, and 31 boarders and 245 alighters in the PM peak. The 510 boarders in the AM peak and 245 alighters in the PM peak can be accommodated by the 12 services per hour proposed assuming a typical vehicle capacity of 50-60 passengers. The majority of private coach trips generated by the Travel Hub site are anticipated to occur outside the peak periods, where on-site provision of 12 coach parking spaces has been taken into account.
- 9.81 In providing their assessment of the application, the Transport Assessment Team noted that circa 317 non-motorised user's (NMUs) will travel on the new NMU path in the AM peak and circa 275 NMUs will travel on the new shared-use path in the PM peak. The proposed footway/cycleway is considered suitable to accommodate this future demand by transport colleagues.
- 9.82 In looking at the traffic impact assessment, colleagues in the Transport Assessment Team noted that bus journey times are expected to be reduced in both the AM and PM peak post-development. In the AM peak period, the VISSIM traffic modelling outputs highlight that average bus service journey times will be reduced by circa 9 minutes. In the PM peak period, it is anticipated that average bus journey times would be reduced by circa 12

minutes. Given the new Travel Hub site is proposed to add 6 additional services towards the City Centre, the average waiting time is expected to be reduced as well.

9.83 The following junctions were assessed by colleagues in the Transport Assessment Team as part of the junction capacity assessment, and are considered acceptable:

- Trumpington Park & Ride access junction (signal junction)
- Addenbrookes Road/Hauxton Road junction (signal junction)
- M11 Junction 11 (signal junction)
- Proposed Travel Hub site access/A10 junction (signal junction)

9.84 The Local Highway Authority is satisfied that the development will have an improvement to the capacity at the M11 Junction 11 as a whole in both the AM and PM peaks, and thus overall the junction is acceptable. However, both the Local Highway Authority and Highways England recognise that further tweaks may be required at the detailed stage, which is why further information is sought to build on the detail set out in draft condition 3, to ensure that the planning permission reflects the wider safety audit and highway approvals obtained for the build.

9.85 In assessing the South West Travel Hub development the Transport Assessment Team has considered the following mitigation package put forward by the applicant, which they consider to be acceptable, subject to detailed design:

- A new lit 5 metre wide hard surfaced NMU route over the M11 between the A10 and the A1309/Hauxton Road, including a new purpose-built bridge over the M11.
- A new off-line Public Transport route between the Travel Hub and the A10 Hauxton Road / Addenbrooke's Road junction.
- 326 cycle parking spaces to be provided initially (176 spaces and 150 chargeable lockers), with on-site space safeguarded to allow for a maximum provision of 538 spaces (334 spaces and 204 chargeable lockers), with a 'monitor and manage approach' to be adopted.
- Improved signage and wayfinding along the NMU route, including travel times on signage to key destinations such as Cambridge Biomedical Campus and Cambridge city centre to help encourage further uptake of trips.
- 12 new public transport vehicles an hour serving the new Travel Hub; 6 routing via the Cambridge Guided Busway and serving the Cambridge Biomedical Campus and Cambridge Railway Station; and 6 routing towards the City Centre along Trumpington Road.
- 12 parking spaces for private coaches.
- 108 'Slow EV' charging points included within the on-site car parking provision.
- Circa one third (670) of the total new Travel Hub spaces will be solar carport spaces situated underneath a photovoltaic (PV) panel, with ducting supplied to the whole Travel Hub site, to allow for future provision subject to necessary planning consent (with the solar power generation from the panels forming part of the energy supply for the Slow EV charging points).
- Automatic Number Plate Recognition (ANPR) cameras to be installed on the new two-lane bus only route.
- A new signalled site access from the A10 and local widening of the A10.
- Local widening of the A1039 Hauxton Road.
- Improvements to the M11 Junction 11.
- Improvements to the A1309 Hauxton Road / Addenbrooke's Road signal junction.

- 9.86 It is anticipated that the bus services which will serve the Travel Hub site will be an extension to the existing services to Trumpington Park & Ride instead of a completely new route and service as initially proposed. The applicant has informed highway colleagues that initial discussions have taken place with Stagecoach who have confirmed their acceptance of the scheme. With regards to the service provision, routes and frequencies anticipated for the new travel hub site, an agreement will look to be negotiated with Stagecoach by 2022 by the applicant, with a proposed opening year of 2024 if planning permission is granted. This is confirmed as acceptable by the CCC Transport Assessment Officer. Furthermore, access for private coaches into the Travel Hub site would be taken from the A10 and a separate coach parking area is proposed to be delivered as part of the proposals with a capacity for 12 coaches to park; 6 designated coach spaces and 6 coach spaces parallel to the carriageway which forms a loop around the 6 designated coach spaces. It is noted that the operation of coach parking at the Travel Hub site is proposed to mimic the existing operation at Madingley Road Park & Ride site, which is used by private coaches for a charge of £10 per day. Informal observations made by the applicant at Madingley Road Park & Ride showed that no private coaches arrived prior to or during the AM peak period. The applicant therefore considers that it is unlikely private coaches will arrive during the AM peak at the new Travel Hub. This is confirmed as acceptable by the CCC Transport Assessment Officer. Coach parking at the new Travel Hub is proposed to be controlled via a manually controlled electric barrier.
- 9.87 Whilst the mitigation measures and principles of the proposals as an extension to the existing Trumpington Park and Ride Site from a transport assessment perspective are accepted, as acknowledged above, it is also noted by planning officers that the internal site layout details inclusive of the internal access road, equestrian access, 'left-in left-out' junction, internal site access roundabout, and the NMU route still need to be finalised and agreed with Local Highway Authority Development Management Officer and other appropriate teams at the detailed design stage of the proposals, as discussed in more detail in the Highway improvements and wider highway considerations section below. The internal landscaping arrangements of the Travel Hub site are also likely to be influenced by the final approved highway designs, alongside input from the successful management company being appointed for the future management of the site (as discussed under paragraph 9.67 of this report) which is why draft condition 14 has been recommended to ensure that all relevant statutory consultees are able to input into any final proposals. Furthermore, it is noted that to prevent unauthorised use of the Travel Hub site, including vehicles parking overnight on the land surrounding the site, a ditch is proposed to surround the internal access road and height restrictions will be in place at certain accesses to the site, details of which will need to be checked before finalising the internal layout and wider landscaping proposals.
- 9.88 Whilst acknowledging that the transport information has been accepted by the Transport Assessment Team in principle, subject to final design checks, officers are also aware of the concerns that have been raised by some objectors in relation to the recent COVID-19 pandemic. In particular concerns that, as a result of COVID-19, travel patterns of users and behaviours used to forecast the demand for the scheme have changed; that may have impacted the basis of need since this application was first submitted. Whilst both highway colleagues and planning officers acknowledge the impact that COVID-19 has had on travel behaviours, particularly with more staff choosing to work from home; they also acknowledge that both the existing and future expansion of the Cambridge Biomedical Campus supports various roles, many of which cannot easily be undertaken at home. Such demand is also the case for patients and visitors to some of these facilities, many of which are yet to open to pre-covid appointment levels. Moreover, the Travel Hub site has also been modelled to

assist with a modal shift in journeys not only to these facilities, but also to Cambridge city centre. As such, whilst the impact that COVID-19 has had on travel behaviours should not be ignored, the extension of the existing park and ride provision is considered to complement the existing services to cater for staff, patients and visitors to these facilities that hold not only a national, but also international, reputation; whilst also supporting opportunities for access to alternative modes of sustainable transport.

- 9.89 The proposal has been assessed and is considered acceptable to the Transport Assessment Team and the Local Highway Authority as it would not contribute to unsustainable levels of additional traffic on the local highway network or create an additional highway hazard. Furthermore, an appropriate NMU route and highway mitigation measures have been proposed by the applicant to help mitigate the development and ensure that cycle parking and on site drop off facilities are in place to encourage travel by more sustainable modes of transport. Planning officers have recommended planning conditions that allow the applicant team to progress the Section 278 works required with highway colleagues (as discussed further below) to ensure that the necessary highway improvements are agreed ahead of construction and delivered prior to use, if planning permission is granted. Acceptance of the demand placed on the area by the Cambridge Biomedical Campus (and the future expansion of the site anticipated) alongside the desired access to Cambridge city centre, mean that officers are comfortable with the demand for a Travel Hub site in this location, even taking account of the recent COVID-19 pandemic and changes to travel patterns. As such, the proposals are considered to be compliant with SCDCLP (2018) policies HQ/1, CC/6, TI/2, and TI/3; and CCCLP (2018) policies 5 and 82.

Highway improvements and wider highway considerations including possible future transport schemes

- 9.90 As already noted in paragraph 9.72 above, the NPPF (2021) requires that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts of development on the road network are severe in line with NPPF paragraph 111. The transport modelling and assessment work considered in paragraphs 9.72 to 9.89 above, have been used to inform the level of highway improvements required, which also take account of cumulative developments and wider committed transport schemes. The Letter of Comfort dated 19 July 2021 has also been obtained from the applicant team, to ensure that committed sums are agreed for future maintenance as a result of this proposed development.
- 9.91 Vehicular access to the Travel Hub site is proposed to be taken off the A10 in the form of a new signalised T-junction, located circa 550 metres (601.49 yards) to the south of the M11 Junction 11. The A10 is proposed to be widened locally to accommodate the signalised site access junction. The proposed junction is noted to include the following features, which need to be agreed with both Highways Development Management and the Council's Signals Team at the detailed design stage of the development:
- Two-lane exit from the Travel Hub site access road onto the A10 of which one lane will be signalised at the stop line for vehicles turning right onto the A10 southbound, and the second lane will be a slip lane for vehicles turning left onto the A10 northbound. The exit slip lane from site will merge with the two ahead lanes on the A10 circa 100 metres (109.36 yards) north of the Travel Hub site access junction.
 - Two lane entry into the Travel Hub site from the A10 of which one lane will be a dedicated right turn lane for vehicles turning right from A10 southbound, and the second will be an un-signalised slip lane for vehicles turning left into the site from the A10 northbound. The entry

slip to the Travel Hub site from the A10 northbound will extend circa 250 metres (273.4 yards) south of the access junction.

- Three-lane approach to the junction on the A10 northbound, with two signalised ahead lanes and the un-signalised left-turn slip lane into the Travel Hub site on the nearside as described above.
- Two-lane approach to the junction on the A10 southbound, one ahead lane and one right turn lane into the Travel Hub site, both of which will be controlled by the signals.

9.92 The impact of the additional traffic on the network and junction capacity has been assessed above and has been confirmed as acceptable by the Council's Transport Assessment Officer and that the site access junction will be able to accommodate the development for all future year assessment scenarios. The applicant has also had extensive discussions with Highways England in relation to the proposals and mitigation measures being put forward, including potential impacts with the placement of a new bridge over the M11 which is likely to need to go in overnight if planning permission is granted. Final detailed designs will be subject to the separate S278 agreement, which are recommended to be linked into draft condition 14 to ensure that all changes are considered for the scheme as a whole.

9.93 The new segregated Public Transport route is proposed to run from the Travel Hub site, over the upgraded accommodation bridge to the A1309 / Addenbrooke's Road / Trumpington Meadows signalised junction, allowing buses to either continue onto the Guided Busway, to Trumpington Park & Ride, or along Trumpington Road for journeys to the Cambridge Biomedical Campus and Cambridge city centre. To accommodate the Public Transport route north of the A1309 / Addenbrooke's Road junction, the existing Trumpington Park & Ride slip road and bus-only route is proposed to be widened to accommodate two-way flow of buses into and out of the Trumpington Park & Ride site. Owing to width constraints on the proposed northbound approach of the Public Transport Route, and the existing northbound slip road from the junction into Trumpington Park & Ride, the A1309 / Addenbrooke's Road signals will be altered as part of the proposals to accommodate movement from the proposed Public Transport route to the existing Trumpington Park & Ride slip road in both directions in order to prevent buses from waiting to cross each other where the road section into / out of the Trumpington Park & Ride site narrows to one lane. The above junction design has been modelled and is noted by CCC Transport Assessment Team to operate within capacity for all assessment scenarios. Amendments were also made by the applicant to take account of concerns raised by CamCycle. Consideration of the wider impacts of these works around the existing Park and Ride site, including tree removal works to accommodate the widening works, are also considered separately in this officer report to take account of residential and visual amenity.

9.94 To take account of discussions with Highways England and also the Local Highway Authority for traffic flows predicted in this area, modelled under the 'Do something' assessment scenario, the applicant has also included some off-site highway improvements which comprise the following:

- M11 Junction - Widening the northbound off-slip to accommodate two ahead lanes and one dedicated left-turn lane for the A10 which will all be subject to signal control. The widening will continue for approximately 30 metres (32.81 yards) beyond the signals to accommodate left-turn traffic onto the A10. Signals are also proposed for both the A1309 Hauxton Road southbound approach to J11 and the circulatory flow on the approach to this arm, to allow traffic to leave Cambridge.

- A1309 Hauxton Road / Addenbrooke's signal junction - Works to accommodate the proposed Public Transport Route joining the junction at the northbound A1309 approach. The proposed Public Transport Route will increase the lanes on the northbound A1309 approach within the junction vicinity to six lanes. The stop line and traffic signals for the Public Transport Route will be set back from the junction by approximately 70 metres (76.55 yards).
 - A1309 Hauxton Road - Widening the existing two-lane exit from J11 of the M11 onto the A1309 Hauxton Road to accommodate four lanes (two ahead and two left-turn approximately 20 metres (21.87 yards) upstream). The nearside lane adjacent to the verge will be designated for traffic ahead into the existing Trumpington Park & Ride site. A further 70 metre (76.55 yards) upstream, it is proposed to widen the A10 further into the nearside verge to accommodate another A1309 ahead lane. Compared to the existing layout which widens from three lanes (labelled Park & Ride, ahead and left-turn lane) to five lanes (two of each ahead and left-turn lane) approximately 100 metres (109.36 yards) to the south of the Addenbrooke's Road junction, the proposed layout will widen to five lanes approximately 280 metres (306.21 yards) to the south of the Addenbrooke's Road junction.
- 9.95 The junction capacity assessments considered by highway colleagues show the A1309 Hauxton Road / Addenbrooke's Road signal junction post-improvement works will be able to accommodate the development for all future year assessment scenarios. The applicant has confirmed detailed design of the A1309 Hauxton Road / Addenbrooke's Road signalised junction improvement scheme will be agreed with both Highways Development Management and the Council's Signals Team at the detailed design stage of the proposals. Works to the proposed M11 junction 11 have also been confirmed as acceptable by Highways England subject to the final design details being set.
- 9.96 As part of the construction works for the above mitigation measures and highway improvements, planning officers have noted that the construction activities will need to be carried out using "Best Practical Means" to prevent unnecessary nuisance and adequately control impacts that will result from those activities. Furthermore, whilst the recommended draft condition restricts work to daytime hours only, it will be expected that certain activities can only be carried out at times when traffic flows allow closures and diversions, such as the bridge placement over the M11, that also need to be in place for health and safety reasons. It would be expected that these times are likely to be at night and any request for night-time working for health and safety reasons would be considered sympathetically. Additionally, given the distance from residential properties and the already relatively high background noise levels at this location, the small increase in working times requested are likely to be acceptable. Nonetheless, an informative has been recommended setting out what information would need to be produced for such operations to be considered in consultation with the Environmental Health Officer. This aligns with other projects in the area to provide a consistent approach and expectation on the applicant.
- 9.97 In addition to the highway works set out above, a new NMU route is also being proposed, in addition to the retention of the existing path in this area. The alignment of the NMU route put forward by the applicant has taken account of the desire line of users creating a shorter distance, but also the need for lighting to be placed along the route for safety reasons (as discussed with the Police Architectural Liaison Officer) that would not be appropriate along the existing path route that is close to trees used by bats. Furthermore, providing an alternative NMU route as part of the design allowed the applicant's initial proposals of a 3.5 metre (11.48 feet) NMU route to be widened to the 5 metres (16.4 feet) included in their submission. Planning officers have acknowledged that the applicant's proposed layout has been designed to reflect the consideration of environmental, ecological, operational, lighting

and security factors, as well as making a more direct route for all non-motorised users, which is in line with both national and local planning policy. The existing path will remain in place and will still be used by the Wildlife Trust and can be used as needed or desired for leisure purposes as is currently the case.

- 9.98 Whilst the proposals have received a wide range of support from equestrian users, particularly when confirmation that references to 'shared use' by the applicant were effectively for all non-motorised users which includes horses, and the design was to include for horse box provision, parking and related infrastructure (including horse corral and the re-use of mounting blocks at the bridge location) and an appropriate surface for all users as is already the case for the wider greenways in the area; some concerns have been raised around the lack of references to the permissive access from Great Shelford which joins the A10 opposite the NMU path and the bridleway network from the A10 which are well used, and concerns surrounding safety without the installation of a Pegasus crossing. Many representations felt that before this project commences it is essential a safe crossing of the A10 for NMU's is provided to mitigate the danger from the construction and the ongoing travel hub traffic in the form of a Pegasus crossing located at the junction of the NMU path on the Country Path with the A10 just opposite the permissive bridleway to Great Shelford. However, as a crossing in this location has never been intended for this scheme and therefore is outside the scope of the project, an audit for the junction has not been undertaken. Additionally it should be noted that no statutory consultee has requested that such a crossing should be provided in this location either as it is not necessary to make the development acceptable which means that it does not meet the necessary planning tests set out in paragraph 56 of the NPPF (2021).
- 9.99 Whilst acknowledging that the highway works have been accepted by the Local Highway Authority and Highways England in principle, subject to final design checks, officers are also aware of the concerns that have been raised by some objectors in relation to the wider transport schemes that may come forward in the future, and how such schemes would impact on the viability of these proposals. In particular reference has been made to the possible Foxton Travel Hub proposal (as a scheme outside of the Cambridge Green Belt and placed on the A10 corridor); the Cam Metro (that may now be reviewed given the recent election of a new Mayor); and the East / West Rail proposals. Given the current uncertainty of the above schemes and the need to assess the proposals in front of us in line with the adopted development plan, officers are unable to give any weight to these alternative schemes; and having looked into each, are content that they do not directly conflict with what is being proposed at the Travel Hub site. Furthermore, policy support for modal shift, expansion of park and ride provision and support in the local transport plan for provision in this area all need to be taken into account in the planning balance.
- 9.100 The highway works and mitigation proposals put forward by the applicant have been assessed and are considered acceptable to the Local Highway Authority and Highways England, subject to final detailed design. As already noted in paragraph 9.89 Planning Officers have recommended planning conditions that allow the applicant team to progress the Section 278 works under the Highways Act 1980 required with highway colleagues to ensure that the necessary highway improvements are agreed ahead of construction and delivered prior to use, if planning permission is granted. Acceptance of the proposed highway mitigation measures based on the Travel Hub site are considered to be compliant with SCDCLP (2018) policies HQ/1, CC/6, TI/2, and TI/3; and CCCLP (2018) policies 5 and 82.

Climate Change and Sustainability

- 9.101 SCDCLP (2018) Policies CC/2 (Renewable and Low Carbon Energy Generation) and CC/3 (Renewable and Low Carbon Energy in New Developments) support proposals which can demonstrate mitigation against climate change and low carbon developments which use renewable energy technologies; and policy CC/4 (Water Efficiency) supports proposals which are water efficient. Such developments for renewable and low carbon sources are supported in principle by SCDCLP (2018) Policy CC/2 criterion 1 subject to (a) the development not having unacceptable impacts on heritage and natural assets, high quality agricultural land, the landscape or amenity of nearby residents; (b) the energy generated being linked to infrastructure or used for on-site needs; (c) subject to decommissioning, including the removal of facilities and restoration of the site when the energy generation equipment is no longer required; and (d) applicants have engaged effectively with the local community and local authority; whilst SCDCLP (2018) Policy CC/4 criterion 2 seeks for proposals for non-residential development to demonstrate a water conservation strategy.
- 9.102 CCCLP (2018) Policies 28 (Carbon reduction, community energy networks, sustainable design and construction, and water use) 29 (Renewable and low carbon energy generation) and Policy 31 (Integrated water management and the water cycle) support proposals which can demonstrate mitigation against climate change and low carbon developments which use renewable energy generation and are water efficient, including the re-use of water and the management of surface water. Policy 28 seeks development to demonstrate (a) adaptation to climate change; (b) carbon reduction; (c) water management; (d) site waste management; and (e) use of materials. Such developments for renewable and low carbon sources are supported in principle by CCCLP (2018) Policy 29 subject to (a) the development not having unacceptable adverse impacts on the environment, including local amenity and impacts on the historic environment and the setting of heritage assets, have been minimised as far as possible; and (b) that where any localised adverse environmental effects remain, these are outweighed by the wider environmental, economic or social benefits of the scheme (excluding wind turbines); whilst CCCLP (2018) Policy 31 criterion (c) seeks for proposals to demonstrate that water is seen as a resource and is re-used where practicable, offsetting potable water demand, and that a water sensitive approach is taken to the design of the development.
- 9.103 Whilst it is acknowledged that the Travel Hub site building does not directly trigger the climate change requirements for all the policies set out in paragraphs 9.101 and 9.102 above; on the basis that the County Council declared a climate change emergency in May 2019 and are seeking through other committees to reduce the Council's carbon footprint in line with the Council's Climate Change and Environment Strategy that was approved by Full Council in May 2020, officers have considered it appropriate to include this assessment in their planning balance. Officers within the Climate Change and Energy Service are aware of this proposal and they have worked with the applicant team to ensure that inclusion of solar panels and the future proofing of this site from a sustainability perspective have been included within the planning proposals. The proposed Travel Hub building will need to be undertaken through Building Regulations requirements which already seek to ensure energy efficiency measures for non-residential properties under the Nearly Zero Energy Buildings (NZEB) regulation.
- 9.104 With the inclusion of solar panels and underground infrastructure to allow additional electric charging provision in the future (subject to planning consents that would take account of any implications to the Cambridge Green Belt setting), it is considered that this element of the scheme will not conflict with the Council's aspiration to produce renewable energy and

are therefore in the spirit of the energy generation climate change work being done by the Council. Furthermore, the aspirations of the applicant in the development of this scheme to provide a Travel Hub to encourage opportunities for a modal shift that allows more sustainable travel options into Cambridge city centre and the Cambridge Biomedical Campus, including Addenbrooke's complex, are also in line with the broad aspirations of the Council's climate change policy and work to achieve net zero by 2050, which come with associated air quality benefits. As set out in paragraph 9.88 whilst the pre-COVID modelling is likely to see a change to future working methods, this is less likely for the Cambridge Biomedical Campus where surgeons, doctors, nurses, cleaners and support staff etc. do not have the opportunity to work from home in the same way as other sectors of the business community.

- 9.105 In addition to the Council's own climate change agenda and input, the Travel Hub site proposals were also considered by the Sustainability Officer on behalf of the Greater Cambridge Shared Planning Team, where it was acknowledged that from a sustainability perspective the proposals were supported (as set out in paragraphs 6.12 and 6.13 of this officer report). Reference was made to the intention to facilitate the increased use of sustainable modes of transport and the provision of electric vehicle charging (with ducting providing for 100% provision in the future) and the use of PV panels on site to meet approximately 31% of the site's energy requirements. Furthermore, whilst noting that the toilet provision will be made as part of the Travel Hub building will be a relatively low water user, it was recommended that water efficient sanitary ware be used for the toilets in line with Part G of the Building Regulations; and that the Glint and Glare Assessment had concluded no overall impact so long as the proposed landscaping is maintained at an adequate height (same or higher than the height of the solar car port). To take account of these comments planning officers have recommended that an informative is added to any decision, if planning permission is granted, to take account of the comments made by the Sustainability Officer in relation to water usage, and have also sought to control the layout of the solar panels and also the height of planting around them to take account of potential glint and glare impacts.
- 9.106 Whilst a transport scheme that contains parking will always come with concerns of encouraging car usage, that is contrary to the climate change agenda, the design of this Travel Hub is seeking to take existing trips and provide a modal shift opportunity that aligns with local transport and climate change aspirations, including the provision of energy generation and future infrastructure to expand on this in the future, in line with local and national policies. As such, based on the recommended informative and planning conditions linked to the creation of a NMU route and other sustainable methods of transport, including cycling provision, and the provision of energy generation to support electric charging points on the site, with the related decommissioning of energy infrastructure if no longer required in the future, it is considered that the proposals are compliant with SCDCLP (2018) policies HQ/1, TI/2, TI/3, SC/12, CC/2, CC/3 and CC/4; and CCCLP (2018) policies 5, 28, 29, 31 and 82, that provide opportunities and benefits to be placed in the planning balance.

Residential Amenity

- 9.107 SCDCLP (2018) policies HQ/1 (Design Principles), SC/9 (Lighting Proposals), SC/10 (Noise Pollution), SC/12 (Air Quality), SC/14 (Odour and Other Fugitive Emissions to Air), and CC/6 (Construction Methods) state that planning permission will not be granted where the proposed development would have an unacceptable adverse impact on the health and amenity of occupiers and surrounding uses from development that is overlooking, overbearing, or results in a loss of daylight or development which would create

unacceptable impacts such as noise, vibration, odour, emissions and dust. CCCLP (2018) policies 34 (Light pollution control), 35 (Protection of human health and quality of life from noise and vibration), and 36 (Air quality, odour and dust) offer similar protection.

- 9.108 South Cambridgeshire District Council's Environmental Health Officer (EHO) has considered the impact of the proposals on the health and amenity of occupiers and surrounding uses in terms of noise, vibration and dust, burning of waste, and lighting implications on behalf of both South Cambridgeshire District Council and Cambridge City Council residents. Having assessed the documentation the EHO considers that the proposals are acceptable subject to appropriate conditions including the submission and approval of a detailed Construction Environmental management Plan (CEMP) and controls over no burning of waste.
- 9.109 The impact of the submitted Lighting Assessment prepared by Skanska (Report Ref: SIS/5020323/Street Lighting Assessment Rev E) has been assessed and confirmed as acceptable in principle by the EHO. However, given the final designs are yet to be confirmed, planning officers have recommended conditions are attached to any grant of permission to ensure that the final lighting design is submitted and assessed by the EHO on the health and amenity of occupiers, alongside colleagues from an ecology perspective to ensure that the final details safeguard the amenity of both humans and animals.
- 9.110 The Cambridge South West Travel Hub Transport Assessment (dated 28 May 2020) prepared by Mott MacDonald Document reference: 413752-MMD-TRA-XX-RP-TA-0002. submitted by the applicant considers environmental/operational impacts from changes in transportation modes. The effect of increased vehicle movements on surrounding roads has been considered by the EHO in relation to possible increased noise levels. However, it should be noted that generally the baseline noise climate is already dominated by transportation sources (i.e. traffic). The traffic data obtained indicates that road traffic noise from the A10 and on routes through these receptor groups would result in negligible changes (i.e. noise level increases or decrease of less than 1dB). This development has a relatively small contribution to the overall increase in noise levels resulting from the increase in traffic forecasted and is considered acceptable by the EHO. Furthermore, it is acknowledged that the applicant is looking to ensure the existing noise attenuation created on the northern side of the M11 is retained and re-profiled to allow for the bus route, whilst maintaining the height and approved profiles agreed under S/2501/16/DC Discharge of Condition 50 (parts e and g – earth bund) of outline planning consent S/0054/08/O as set out in paragraph 9.65 of this officer report. As such, appropriate mitigation for noise impacts are considered secured and protected through the appropriate use of planning conditions.
- 9.111 Concerns have been raised by Trumpington Resident's Association (TRA) about the area close to the existing Trumpington Park and Ride site, where proposals for the bus route are seen to have an impact to the existing landscape and biodiversity areas, as identified in paragraph 7.5 of this officer report. In particular TRA is concerned that the tree belt in question not only screens the existing Trumpington Park and Ride site from the Glebe Farm estate and Bishop's Road dwellings on the other side of Hauxton Road, but also forms part of the green entrance from the new city edge to Trumpington village and onward into Cambridge city centre. Planning officers have noted the reduction in the tree belt on the existing Trumpington Park and Ride site from the recent expansion plans permitted under planning permission C/5001/18/CC approved November 2018, and from the experience of that development have assessed the proposals on the worst case scenario of all these trees needing to be removed and limited opportunities for replacement planting to exist in this area. Whilst the applicant is committed to retaining as much of this tree belt as

possible, the assessment on visual impact and residential amenity has been considered on a substantial loss as noted above. In doing so, it is acknowledged that the Glebe Farm and Bishop's Road residents would have clearer views into this urban area, but given the changing nature of this urban area and gateway into Cambridge, with the existing A1309 Hauxton Road already acting as a separation, the implications of this reduction is not considered significant enough to warrant a recommendation of refusal. The applicant's proposals are also identifying a net gain in biodiversity which is being controlled by conditions to ensure that this is adequately controlled to offset this loss.

- 9.112 Subject to the recommended planning conditions put forward by the EHO, with the related informatives to guide the submissions, the proposal is considered acceptable and in accordance with SCDCLP (2018) policies HQ/1, SC/9, SC/10, SC/12, SC/14 and CC/6 and CCCLP (2018) policies 34, 35 and 36.

Surface Water, Foul Water Drainage and Flooding (Flood and Water Management)

- 9.113 SCDCLP (2018) policies CC/7, CC/8, and CC/9 state that water quality should be protected with proposals demonstrating adequate water supply, sewerage and land drainage systems with sustainable drainage systems (SUDS) incorporated to manage water drainage at source, protect water quality from pollution run off with details of management/maintenance of SUDS provided. The proposal should also contribute to an overall reduction in flood risk. SCDCLP (2018) Policy CC/9 states that proposals would only be supported where there is no increase to flooding. The site is located within Flood Zone 1 which indicates a low risk of flooding.
- 9.114 CCCLP (2018) policies 28 and 31 also seek to ensure that new development should take the available opportunities to integrate the principles of sustainable design and construction into the design of proposals so that they do not exacerbate Cambridge's severe water stress. Indeed, all new development is required to meet minimum standards of sustainable construction, carbon reduction and water efficiency, unless it can be demonstrated that such provision is not technically or economically viable. Furthermore, controls on surface water, and groundwater protection are also required as part of these policy requirements.
- 9.115 The Lead Local Flood Authority (LLFA) has advised that the submitted documents demonstrate that surface water from the proposed development can be managed through the use of permeable paving over the car parking spaces with an integrated swale network through the site. Surface water is proposed to be stored in an attenuation basin in the centre of the site and on the west of the site before discharge to the existing surrounding watercourse network at 63.1 l/s. Surface water from the public transport route will drain to a swale, carrying surface water to the River Cam where the surface water will be discharged at the equivalent greenfield rates. It has been agreed that the Coprolite Ponds require additional water within the system and therefore the northern car parking area is proposing to discharge the majority of surface water into Coprolite Pond X following further treatment in a grassed swale. A pumped overflow is provided in the event that the Coprolite Ponds fill in storm events, pumping surface water to the downstream extents of the existing surface water system. Surface water runoff from the additional slip road works from the M11 are proposed to be connected to the wider M11 drainage network. Water quality has been adequately addressed when assessed against the Simple Index Approach outlined in the CIRIA SuDS Manual.
- 9.116 On the basis that the LLFA has confirmed that the surface water drainage layout would ensure that the proposal would not give rise to any drainage or flooding risks; and Anglian

Water has not objected to the proposal in relation to the limited use of water by the proposed Travel Hub site building, the proposals are considered to be compliant with SCDCLP (2018) policies CC/7, CC/8 and CC/9 and CCCLP (2018) policies 28 and 31.

Public Art

- 9.117 SCDCLP (2018) Policy HQ/2 expects the Council to “encourage” the provision of public art for major development proposals or to make a financial contribution to support public art initiatives. Whilst technically the scheme does not trigger this requirement as it is not proposing in excess of 1,000 square metres (1,196 square yards) of floorspace, officers have considered this requirement as part of the overall consideration of the proposals. In doing so it is acknowledged that the provision of this has to be balanced with the other mitigation requirements for the proposal.
- 9.118 Taking account of the positive amendments made to the scheme by the applicant team during the planning process, and taking account of the heritage boards and opportunities being discussed with the Historic Environment Team, the proposal is considered acceptable without the need for public art. When taken as a whole, it is considered by officers to be in accordance with the spirit of SCDCLP (2018) Policy HQ/2.

Airport Safety

- 9.119 SCDCLP (2018) Policy TI/6 relates to the Cambridge Airport Public Safety Zone. This makes reference to the safety zones for Cambridge Airport (as set out in Figure 12 of the SCDCLP) and the Imperial War Museum at Duxford (as set out in Figure 13 of the SCDCLP). As identified in paragraph 2.3 of this report, the proposal site falls within protected zones shown on Figures 12 and 13 of the SCDCLP (2018) that restrict development to 90 metres (295.3 feet) and 45 metres (147.6 feet) respectively.
- 9.120 CCCLP (2018) Policy 37 also relates to the Cambridge Airport Public Safety Zone and Air Safeguarding Zones and like the SCDCLP (2018) policies discussed above seeks to protect the airport from inappropriate development.
- 9.121 Given that the proposals have been designed to limit the height of any structures within the Cambridge Green Belt and the application included a glint and glare assessment to take account of the solar panels proposed, neither Cambridge Airport nor the Imperial War Museum have objected to the proposals, albeit the latter has asked for further consultation on certain aspects of the project, particularly at the construction stage, which is why officers have recommended an informative should planning permission be granted. As such, subject to the proposed informative, and the control of the solar panels to align with the glint and glare assessment carried out (draft condition 27) the scheme is considered to comply with the safety requirements set out in SCDCLP (2018) Policy TI/6 and CCCLP (2018) Policy 37.

Other issues, including air quality, health impact assessment and contaminated land

Air Quality

- 9.122 SCDCLP (2018) Policy SC/12 covers air quality, which states *development will be permitted where: a. It can be demonstrated that it does not lead to significant adverse effects on health, the environment or amenity from emissions to air; or b. Where a development is a sensitive end use, that there will not be any significant adverse effects on health, the*

environment or amenity arising from existing poor air quality. Furthermore, SCDCLP (2018) Policy TI/2 (Planning for Sustainable Travel) also requires a site based Low Emission Strategy to be submitted for larger developments, to ensure the implementation of suitable mitigation measures. CCCLP (2018) Policy 36 (Air quality, odour and dust) also seeks to protect air quality issues in a similar manner, which states that *development will be permitted where it can be demonstrated: a. that it does not lead to significant adverse effects on health, the environment or amenity from polluting or malodorous emissions, or dust or smoke emissions to air; or b. where a development is a sensitive end-use, that there will not be any significant adverse effects on health, the environment or amenity arising from existing poor air quality, sources of odour or other emissions to air.*

9.123 Guidance was sought from GCSP colleagues on air quality in line with the recommendation provided by the Environmental Health response received. In responding the GCSP Scientific Officer – Air Quality confirmed that whilst they didn't object to the proposed development, they emphasised the need for a careful consideration, support and delivery of the proposed Low Emission Strategy to reduce the emissions associated with the proposed site. Attention was drawn to Chapter 9 of the Transport Assessment which outlines the low-emission strategy for the Travel Hub that can further contribute to sustainable journeys to/from Cambridge. Therefore, planning conditions were recommended, should planning permission be granted, for implementation of the Low Emission Strategy and a Construction Environmental Management Plan to cover dust measures.

9.124 Given the guidance provided by Scientific Officer – Air Quality, officers are content that subject to draft conditions 4 and 17 the proposals meet the requirements set out in SCDCLP (2018) Policies SC/12 and TI/2 and CCCLP (2018) Policy 36.

Health impact assessment (HIA)

9.125 SCDCLP (2018) Policy SC/2 covers the requirement for a Health Impact Assessment (HIA), which states that new development should have a positive impact on the health and wellbeing of new and existing residents. However, it is acknowledged that technically the Travel Hub proposals do not trigger the need for this requirement.

9.126 Irrespective of the triggers noted above, guidance was sought from GCSP colleagues on the HIA, in addition to consultation carried out with public health colleagues at the County Council, in line with the recommendation provided by the Environmental Health response received. However, no specific comments were received in this regard from either the county public health colleagues or the GCSP Public Health Officer, who confirmed that she had comments to make having reviewed the documentation.

9.127 Given that no specific concerns were raised by any of the relevant specialist consultees, officers are content that the submission is in line with the requirements set out in SCDCLP (2018) Policy SC/2.

Contaminated Land

9.128 SCDCLP (2018) Policy SC/11 covers the need to ensure that contaminated land is assessed appropriately, which states that where *development is proposed on contaminated land or land suspected of being impacted by contaminants the Council will require developers to include an assessment of the extent of contamination and any possible risks. Proposals will only be permitted where land is, or can be made, suitable for the proposed use.* CCCLP (2018) Policy 33 seeks to protect any contaminated land issues in a similar

manner, which states *development will be permitted where the applicant can demonstrate that: a. there will be no adverse health impacts to future occupiers from ground contamination resulting from existing/previous uses of the area; b. there will be no adverse impacts to the surrounding occupiers, controlled waters and the environment from suspected/identified ground contamination from existing/previous uses, caused by the development; and c. there will be no impact to future and surrounding occupiers from on-site and off-site gas migration.* Furthermore that *where contamination is suspected or known to exist, an assessment should be undertaken to identify existing/former uses in the area that could have resulted in ground contamination.*

- 9.129 Guidance was sought from GCSP colleagues on land contamination, in line with the recommendation provided by the Environmental Health response received. In responding the GCSP Scientific Officer (Contaminated Land) confirmed that the only immediately evident environmental constraints that would attract a contaminated land condition is the presence of occasional areas of infilled land, associated with a history of coprolite mining within this area, immediately to the north west of the proposed development. However, the proposed development is not particularly sensitive to the presence of contamination and therefore she recommended an informative be attached to any grant of consent to cover the eventuality of any unforeseen contamination. Furthermore, it was acknowledged that the proposals will entail significant movement of material to facilitate the required earthworks. However, it was noted that a Construction Environmental Management Plan (CEMP) had already been recommended by Environmental Health, where part H of the proposed condition addresses the setting out of 'Measures for soil handling and management including soil that is potentially contaminated'.
- 9.130 Given the guidance provided by GCSP Scientific Officer (Contaminated Land) and the Environmental Health Officer, officers are content that subject to draft conditions 4 and 13 the proposals meet the requirements set out in SCDCLP (2018) Policy SC/11 and CCCLP (2018) Policy 33.

Non-material considerations

- 9.131 Other comments were also received in relation to impacts to house prices that are not material considerations in the assessment of this development.

10. Conclusion

- 10.1 As set out in paragraph 8.1 of this report, applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The current proposal is on an unallocated site within the SCDCLP (2018) and CCCLP (2018) development plan areas and is in conflict with NPPF Policy advice with regards to protecting the Green Belt and local landscape. All of which has been taken into account in the planning balance by officers.
- 10.2 It is clear from the officers' report that there have been a number of representations made by people who are concerned with some aspects of the proposed Travel Hub (including the use of the existing agricultural / accommodation bridge) with regards to the loss of and visual impact on the Green Belt, impact on the surrounding landscape and amenity of sensitive receptors, the need for the development, loss of agricultural land, pressures on the adjacent Trumpington Meadows Country Park and Nature Reserve, impact on existing ecology and biodiversity in the area, traffic congestion and air quality concerns. The development plan

supports the potential for opportunities to provide a modal shift and sustainable transport in the area, particularly where a range of users would benefit from an enhanced public right of way network. However, the proposed development is considered to conflict with national policy and development plan policies that seek to protect the Green Belt, the protection of best and most versatile land, and local plan policy which seeks to protect the character and appearance of the local landscape.

- 10.3 It is clear in paragraph 147 of the NPPF (2021) that *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”*. Local Authorities are advised in paragraph 144 that, *“when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of appropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”*. Furthermore, paragraph 149 states that *“a local authority should regard the construction of new buildings as inappropriate in the Green Belt”* and states a number of exceptions to this. The proposed Travel Hub does not fall within any of the exception categories stated in NPPF paragraphs 149(a-g) and is therefore by definition ‘inappropriate development’, unless the potential harm to the Green Belt by reason of inappropriateness, and other harm resulting from the proposal is clearly outweighed by other material considerations.
- 10.4 When taking into account what considerations and key benefits identified by planning officers in paragraph 9.19 could outweigh the harm to the Green Belt (including visual impact) that have been discussed in paragraphs 9.21 to 9.29 of this officer report; it will also be important for Members to consider paragraphs 100, 105 and 112 (a-e) of the NPPF (set out in more detail in paragraph 8.3 of this report), where support is provided for proposals that protect and enhance public rights of way, provide a genuine choice of transport modes, and encourage public transport, with pedestrian and cycle links, and designed to enable charging of plug-in and other ultra-low emission vehicles.
- 10.5 Taking into account the material planning considerations discussed in section 9 of this report, officers are of the view that the ‘appropriateness’ of the site has been demonstrated and the potential harm to the Green Belt, when weighed against all other assessment considerations is finely balanced in favour of the proposal. This takes account of the substantial negative weight given to the harm to the Green Belt and the Landscape / Visual impacts, and the negative weight provided to the loss of Best and Most Versatile Farmland; the neutral weight given to Lord’s Bridge, Residential Amenity, Public Art, Surface Water, Airport Safety, and other matters including Air Quality, Health Impact Assessment and Contaminated Land that are capable of being controlled by planning conditions in line with paragraph 55 of the NPPF; and the positive weight given to the need and justification of providing a modal shift opportunity close to the Cambridge Biomedical Campus to complement the existing Trumpington Park and Ride Site, the key benefits highlighted by officers in paragraph 9.19 of this report, Ecology and Net Gain commitments, Heritage and Archaeology with interpretation benefits, and the climate change and sustainability measures designed to run alongside the modal shift benefits.
- 10.6 Therefore based on the planning balance undertaken by officers, it is considered that, when material considerations are taken into account, the proposal although finely balanced meets the general principles of the NPPF (2021). Essentially it is for members to strike a balance between the benefits of the development in meeting the demand for sustainable travel, improvements to the public right of way network, and providing a genuine choice of transport solutions to encourage a modal shift in travel, alongside the benefits to supporting the

Cambridge Biomedical Campus, including the sustainability of the development and matters given positive weight by officers, balanced against the harm to the Green Belt, impact on Best and Most Versatile Farmland and local landscape. Having taken into account the provisions of the development plan discussed in paragraph 8.1 of this report, the policies in the NPPF (2021), the views of statutory consultees and wider stakeholders, as well as all other material planning considerations, officers have sought to reach a sound planning judgement. This decision takes account of the views and the valid concerns put forward by the Wildlife Trust and other historic and natural environmental groups, the local Parish Councils and Resident Associations / Amenity Groups, Cam Cycle, and the neighbour representations received regarding the impacts on the existing cycle commuter route, use of the existing agricultural / accommodation bridge, traffic, air quality, green belt, amenity, flooding and biodiversity; and the general support provided by the British Horse Society and local Bridleway Associations and Groups. Officers have given considerable importance and weight to the policy considerations of the local adopted development plan and national NPPF (2021) policies on an unallocated site within the Cambridge Green Belt and balancing the potential harm against the 'very special circumstances' (see paragraphs 9.21 to 9.29 for the harm and paragraphs 9.16 to 9.20 in relation to the very special circumstances in this report), and positives demonstrated in relation to need and justification, ecology and biodiversity, heritage and archaeology, and climate change and sustainability measures.

- 10.7 In conclusion, officers consider the proposals in the planning balance just tips in the favour of the development and therefore officers recommend that there is a balanced justification to support the development of the South West Travel Hub as proposed in this application; subject to the planning conditions set out in section 11 of this report, the undertakings set out in the Letter of Comfort, and agreement by the Secretary of State as a development contrary to the adopted development plan.

11. Recommendation

- 11.1 It is recommended that, subject to the matter being referred to the Secretary of State for further consideration and the application not being called in, planning permission is granted subject to the following conditions:

Advisory Note

The Town & Country Planning (Development Management Procedure) (England) Order 2015 requires the Planning Authority to give reasons for the imposition of pre-commencement conditions. Conditions 4, 5, 7, 8, 9, 10, 14, 15, 16, 17, 20, 21 and 22 below all require further information to be submitted, or works to be carried out, to protect the environment and ensure sustainable methods of operation during the construction of the development and are therefore attached as pre-commencement conditions. The developer may not legally commence development on site until these conditions have been satisfied.

1. Commencement of Development

The development hereby permitted shall be commenced not later than 3 years from the date of this permission. Within 14 days of the commencement of the development hereby permitted, the County Planning Authority shall be notified in writing of the date on which the development commenced.

Reason: *In accordance with the requirements of section 91 of the Town and Country Planning Act 1990 as amended by section 51 of the Planning and Compulsory Purchase Act 2004 and in order to establish the timescales for those details provided by conditions and to enable monitoring of the development.*

2. Opening/occupation of Development

Within 14 days of the travel hub first being brought into public use, or occupation of any part of the development hereby permitted whichever is the sooner, the County Planning Authority shall be notified in writing of the date on which the development was first opened or occupied.

Reason: *In order to be able to establish the timescales for the approval of details reserved by conditions.*

3. Approved Plans and Documents

The development hereby permitted shall be carried out in accordance with the application dated 3 June 2020; the following approved plans and documents (received 11 June 2020 unless otherwise stated); and as amended by the information approved as required by the following conditions:

- Travel Hub & Highways Red Line Boundary (Including Construction Boundary), Skanska Technology, ref: H19532-SKA-GEN-ZZ-DR-CH-0001-S4 Rev P09, dated May 2020;
- Travel Hub General Arrangement Plan, Skanska Technology, ref: H19532-SKA-GEN-ZZ-DR-CB-0700-S4 Rev P13, dated 25 September 2020 (received 21 October 2020);
- General Arrangement Shared Use Bridge, Skanska Technology, ref: H19532-SKA-SBR-XX-DR-CB-1000-S0 Rev P04, dated 6 March 2020;
- Shared Use Bridge Section, Skanska Technology, ref: H19532-SKA-SBR-XX-DR-CB-1002-S0 Rev P01, dated 6 March 2020;
- Travel Hub Building Floor Plan (General arrangement), Skanska Technology, ref: H1953200-CSWTH-LO-1101 Rev P05, dated 18 February 2020;
- Travel Hub Buildings Sections, Skanska Technology, ref: H1953200-CSWTH-LO-1701 Rev P03, dated 18 February 2020;
- Travel Hub Building Elevations, Skanska Technology, ref: H1953200-CSWTH-LO-1751 Rev P03, dated 18 February 2020;
- Travel Hub Sections (Solar car ports), Skanska Technology, ref: H19532-SKA-GEN-ZZ-DR-CH-0702-S4 Rev P04, dated 19 March 2020;
- Travel Hub Sections, Skanska Technology, ref: H19532-SKA-GEN-ZZ-DR-CH-0703-S4 Rev P03, dated 13 March 2020;
- Travel Hub Sections, Skanska Technology, ref: H19532-SKA-GEN-ZZ-DR-CH-0704-S4 Rev P04, dated 28 May 2020;
- Travel Hub Sections, Skanska Technology, ref: H19532-SKA-GEN-ZZ-DR-CH-0708-S4 Rev P05, dated 13 March 2020;
- Drainage Strategy Report, SKANSKA Technology, ref: SIS/5020323/CSWTH Rev A, dated: 1 June 2020;
- Travel Hub Proposed Drainage Strategy Layout Site Overview, Skanska Technology, ref: H19532-SKA-HDG-ZZ-DR-CD-0500-S4 Rev P04, dated 6 August 2020 (received 21 October 2020);
- Travel Hub Proposed Drainage Strategy Layout Sheet 1 of 5, Skanska Technology, ref: H19532-SKA-HDG-ZZ-DR-CD-0501-S4 Rev P03, dated 6 April 2020;

- Travel Hub Proposed Drainage Strategy Layout Sheet 2 of 5, Skanska Technology, ref: H19532-SKA-HDG-ZZ-DR-CD-0502-S4 Rev P02, dated 6 March 2020;
- Travel Hub Proposed Drainage Strategy Layout Sheet 3 of 5, Skanska Technology, ref: H19532-SKA-HDG-ZZ-DR-CD-0503-S4 Rev P02, dated 6 March 2020;
- Travel Hub Proposed Drainage Strategy Layout Sheet 4 of 5, Skanska Technology, ref: H19532-SKA-HDG-ZZ-DR-CD-0504-S4 Rev P02, dated 6 March 2020;
- Travel Hub Proposed Drainage Strategy Layout Sheet 5 of 5, Skanska technology, ref: H19532-SKA-GEN-ZZ-DR-CD-0505-S4 Rev P04, dated 6 August 2020 (received 21 October 2020);
- Travel Hub Existing Drainage Areas Copralite Ponds, Skanska Technology, ref: H19532-SKA-HDG-ZZ-DR-CD-0506-S4 Rev P01, dated 6 March 2020;
- Travel Hub Proposed Drainage Areas Overall Site Breakdown, Skanska Technology, ref: H19532-SKA-HDG-ZZ-DR-CD-0507-S4 Rev P01, dated 6 March 2020;
- Travel Hub Proposed Drainage Areas Discharging to Copralite Ponds, Skanska Technology, ref: H19532-SKA-HDG-ZZ-DR-CD-0508-S4 Rev P01, dated 6 March 2020;
- Travel Hub Drainage Sections Section 01, Skanska Technology, ref: H19532-SKA-HDG-ZZ-DR-CD-0509-S4 Rev P02, dated 17 April 2020;
- Drainage Access / Maintenance Route Plan, Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0701-S4 Rev P13 dated 25 September 2020 (received 21 October 2020);
- Flood Risk Assessment, Mott MacDonald, ref: 413752-MMD-ENV-XX-RP-EN-0017 Rev B, dated 28 May 2020;
- SUDS Drainage Strategy, Jenkins & Potter Consulting Engineers, ref: 24404-0001REP Rev 1, dated 14 May 2020;
- SUDS Drainage Strategy, Jenkins & Potter Consulting Engineers, ref: 24404-0002REP Rev 0, dated May 2020;
- Travel Hub Swale Bridges, Skanska Technology, ref: H19532-SKA-SBR-XX-DR-CB-1801-S4 Rev P01, dated 13 March 2020;
- Travel Hub Culvert C1 Details, Skanska Technology, ref: H19532-SKA-SBR-XX-DR-CB-2501-S4 Rev P01, dated 27 March 2020;
- M11 Overbridge to A1309 Hauxton Road Public Transport Route Drainage Layout, Jenkins & Potter Consulting Engineers, ref: 24404 01 Rev F, dated 13 May 2020;
- A10 Cambridge Road Travel Hub Entrance and M11 Slip Road Highway Widening Drainage Layout, Jenkins & Potter Consulting Engineers, ref: 24404 03 Rev C, dated 6 May 2020;
- Public Transport Route Drainage Details Sheet 1, Jenkins & Potter Consulting Engineers, ref: 24404 100 Rev A, dated 14 May 2020;
- Travel Hub Proposed Re-Graded Ditch C (Sheet 1 of 3), Skanska Technology, ref: H19532-SKA-HDG-ZZ-DR-CE-0617-S4 Rev P02, dated 12 March 2020;
- Travel Hub Proposed- Re-Graded Ditch C Sections Views (Sheet 2 of 3), Skanska Technology, ref: H19532-SKA-HDG-ZZ-DR-CE-0618-S0 Rev P01, dated 6 March 2020;
- Travel Hub Proposed Re-Graded Ditch C Sections Views (Sheet 3 of 3), Skanska Technology, ref: H19532-SKA-HDG-ZZ-DR-CE-0619-S4 Rev P01, dated 6 March 2020;
- Earthworks Calculations and Review of Assessments Technical Note, Mott MacDonald, dated 1 December 2020 (received 4 December 2020);
- Landscape and Ecological Management Plan, Mott MacDonald, ref: 413752-MMD-ENV-XX-RP-EN-0014 Rev 3, dated 11 June 2020;
- Landscape Design Location Plan (Sheet 1 of 11) (Included in Volume II: Appendices to the Environmental Statement Appendix H.9), Mott MacDonald, ref: 413752-MMD-LAN-XX-DR-LV-0001 Rev P4, dated 25 August 2020 (received 21 October 2020);

- Landscape Design (Sheet 2 of 11) (Included in Volume II: Appendices to the Environmental Statement Appendix H.9), Mott MacDonald, ref: 413752-MMD-LAN-XX-DR-LV-0002 Rev P4, dated 25 August 2020 (received 21 October 2020);
- Detailed planting proposals (Sheet 3 of 11) (Included in Volume II: Appendices to the Environmental Statement Appendix H.9) Mott MacDonald, ref: 413752-MMD-LAN-XX-DR-LV-0003 Rev P4, dated August 2020 (received 21 October 2020);
- Landscape Design (Sheet 4 of 11) (Included in Volume II: Appendices to the Environmental Statement Appendix H.9), Mott MacDonald, ref: 413752-MMD-LAN-XX-DR-LV-0004 Rev P5, dated 3 December 2020 (received 4 December 2020);
- Landscape Design (Sheet 5 of 11) (Included in Volume II: Appendices to the Environmental Statement Appendix H.9) Mott MacDonald, ref: 413752-MMD-LAN-XX-DR-LV-0005 Rev P5, dated 3 December 2020 (received 4 December 2020);
- Landscape Design (Sheet 6 of 11) (Included in Volume II: Appendices to the Environmental Statement Appendix H.9) Mott MacDonald, ref: 413752-MMD-LAN-XX-DR-LV-0006 Rev P5, dated 25 August 2020 (received 21 October 2020);
- Landscape Design (Sheet 7 of 11) (Included in Volume II: Appendices to the Environmental Statement Appendix H.9), Mott MacDonald, ref: 413752-MMD-LAN-XX-DR-LV-0007 Rev P4, dated 25 August 2020 (received 21 October 2020);
- Landscape Design (Sheet 8 of 11) (Included in Volume II: Appendices to the Environmental Statement Appendix H.9) Mott MacDonald, ref: 413752-MMD-LAN-XX-DR-LV-0008 Rev P4, dated 25 August 2020 (received 21 October 2020);
- Landscape Design (Sheet 9 of 11) (Included in Volume II: Appendices to the Environmental Statement Appendix H.9), Mott MacDonald, ref: 413752-MMD-LAN-XX-DR-LV-0009 Rev P4, dated 25 August 2020 (received 21 October 2020);
- Landscape Design (Sheet 10 of 11) (Included in Volume II: Appendices to the Environmental Statement Appendix H.9), Mott MacDonald, ref: 413752-MMD-LAN-XX-DR-LV-0010 Rev P4, dated 25 August 2020 (received 21 October 2020);
- Landscape Design (Sheet 11 of 11) (Included in Volume II: Appendices to the Environmental Statement Appendix H.9), Mott MacDonald, ref: 413752-MMD-LAN-XX-DR-LV-0011 Rev P4, dated 25 August 2020 (received 21 October 2020);
- Highways Finished Ground Levels – Key Plan (Sheet 1 of 8), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0751-S4 Rev P03, dated 15 September 2020 (received 21 October 2020);
- Highways Finished Ground Levels (Sheet 2 of 8), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0752-S4 Rev P02, dated 27 May 2020;
- Highways Finished Ground Levels (Sheet 3 of 8), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0753-S4 Rev P02, dated 27 May 2020;
- Highways Finished Ground Levels (Sheet 4 of 8), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0754-S4 Rev P02, dated 27 May 2020;
- Highways Finished Ground Levels (Sheet 5 of 8), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0755-S4 Rev P02, dated 27 May 2020;
- Highways Finished Ground Levels (Sheet 6 of 8), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0756-S4 Rev P02, dated 27 May 2020;
- Highways Finished Ground Levels (Sheet 7 of 8), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0757-S4 Rev P02, dated 27 May 2020;
- Highways Finished Ground Levels (Sheet 8 of 8), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0758-S4 Rev P03, dated 15 September 2020 (received 21 October 2020);
- Highways General Arrangement (Sheet 1 of 8), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0759-S4 Rev P03, dated 25 September 2020 (received 21 October 2020);
- Highways General Arrangement (Sheet 2 of 8), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0760-S4 Rev P02, dated 25 September 2020 (received 21 October 2020);

- Highways General Arrangement (Sheet 3 of 8), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0761-S4 Rev P01, dated 4 June 2020;
- Highways General Arrangement (Sheet 4 of 8), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0762-S4 Rev P01, dated 4 June 2020;
- Highways General Arrangement (Sheet 5 of 8), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0763-S4 Rev P01, dated 4 June 2020;
- Highways General Arrangement (Sheet 6 of 8), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0764-S4 Rev P01, dated 4 June 2020;
- Highways General Arrangement (Sheet 7 of 8), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0765-S4 Rev P01, dated 4 June 2020;
- Highways General Arrangement (Sheet 8 of 8), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0766-S4 Rev P02, dated 15 September 2020 received 21 October 2020;
- CCC Adoption Plan, Skanska Technology, ref: H19532-SKA-LLO-ZZ-DR-CH-0001-S4 Rev P01, dated 6 May 2020;
- Park and Ride Longsection Sheet 1 of 1, Skanska Technology, ref: H19532-SKA-GEN-ZZ-DR-CH-0738-S4 Rev P02, dated 15 September 2020 (received 21 October 2020);
- Highways Bus Route Longsection (Sheet 1 of 4), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0745-S4 Rev P02, dated 21 May 2020;
- Highways Bus Route Longsection (Sheet 2 of 4), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0746-S4 Rev P02, dated 21 May 2020;
- Highways Bus Route Longsection (Sheet 3 of 4), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0747-S4 Rev P02, dated 21 May 2020; and
- Highways Bus Route Longsection (Sheet 4 of 4), Skanska Technology, ref: H19532-SKA-HGN-ZZ-DR-CH-0748-S4 Rev P02, dated 21 May 2020.

Reason: *To define the permission and protect the character and appearance of the locality in accordance with policies CC/6, HQ/1, NH/2, NH/8 and NH/14 of the South Cambridgeshire Local Plan (2018) and policies 8, 29 and 34 of the Cambridge City Council Local Plan (2018).*

4. Construction Environmental Management Plan

No development shall commence until a detailed Construction Environmental Management Plan (CEMP) has been submitted to, and approved in writing by, the County Planning Authority. The detailed CEMP shall include, but not be limited to, the following:

- a. Contractors' access arrangements for vehicles, plant and personnel including the location of construction traffic routes to and from the site, details of their signing, monitoring and enforcement measures;
- b. Details of haul routes within the relevant parts of the site;
- c. A plan specifying the area and siting of land to be provided for parking, turning, loading and unloading of all vehicles visiting the relevant parts of the site and siting of the contractors compound during the construction period to be agreed on a phased basis;
- d. Dust management and wheel washing or other suitable mitigation measures such as lorry sheeting, including the consideration of construction / engineering related emissions to air, to include dust and particulate monitoring and review and the use of low emissions vehicles and plant / equipment;
- e. Noise and vibration (including piling) impact / prediction assessment, monitoring and recording protocols / statements and consideration of mitigation measures in accordance with the provisions of BS5228 (2009): Code of practice for noise and vibration control on construction and open site – Part 1 and 2 (or as superseded);

- f. Where relevant results of a noise assessment of the potential impact of construction noise on nearby residential properties and details of suitable noise mitigation measures as appropriate (in accordance with relevant standards and best practice);
- g. Details of best practice measures to be applied to prevent contamination of the water environment during construction;
- h. Measures for soil handling and management including soil that is potentially contaminated;
- i. Details of concrete crusher if required or alternative procedure;
- j. Details of odour control systems including maintenance and manufacture specifications;
- k. Maximum mitigated noise levels produced by construction equipment, plant and vehicles;
- l. Site lighting for the relevant part of the site;
- m. Screening and hoarding details;
- n. Liaison, consultation and publicity arrangements, including dedicated points of contact;
- o. Complaints procedures, including complaints response procedures;
- p. Membership of the considerate contractors' scheme; and
- q. Archaeological protection and mitigation measures to be implemented during the construction process.

The CEMP shall be implemented in accordance with the approved details during the construction phase.

Reason: *To ensure the environmental impact of the construction of the development is adequately mitigated and in the interests of the amenity of nearby residents/occupiers, particularly in terms of local air quality. In accordance with policies CC/6, SC/9, SC/10, SC/11, SC/12 and SC/14 of the South Cambridgeshire Local Plan (2018); Greater Cambridge Sustainable Design and Construction SPD 2020 (section 3.6. Pollution); and policies 33, 34, 35 and 36 of the Cambridge City Council Local Plan (2018). The condition is pre-commencement as it is necessary to agree the detailed information in relation to the CEMP from the outset, prior to the construction phase, to ensure that the appropriate mitigation measures and controls are agreed and in place before any development commences.*

5. Soft and hard landscape works

No development shall commence until a detailed soft and hard landscaping scheme has been submitted to and approved in writing by the County Planning Authority. The details shall include, but not be limited to, the following information:

- planting plans;
- written specifications (including cultivation and other operations associated with plant and grass establishment), schedules of plants noting species, plant sizes, proposed numbers and densities, tree pit details (where appropriate) including, but not limited to, locations soil volume in cubic metres, cross sections and dimensions;
- restoration of soils to allow species-rich grassland to establish;
- details of any alterations relating to existing bunds;
- hard landscaping proposals; and
- a timetable for implementation.

The development shall thereafter be carried out in full accordance with such approved details, including the timetable for implementation.

Reason: *To help to assimilate the development into its surroundings taking account of its Green Belt and heritage setting, whilst also ensuring a benefit to biodiversity net gain, in accordance with policies S/4, CC/2, CC/6, HQ/1, NH/2, NH/4, NH/8 and NH/14 of the South Cambridgeshire Local Plan (2018) and policies 8, 29, 55, 56, 59 and 61 of the Cambridge City Council Local Plan (2018). The condition is pre-commencement as it is necessary to agree the landscaping details to ensure it is capable of assimilating into its surroundings and ensuring the biodiversity net gain is assessed in line with national and local planning policy before any development commences.*

6. 5-Year Landscape Establishment

Any trees or plants provided as part of the landscape scheme as detailed in condition 5 above which, within a period of 5 years from the planting date, die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of a similar size and species as those originally planted.

Reason: *In the interests of visual amenity and safeguarding trees and plants that are worthy of retention in accordance with policies HQ/1, NH/2, NH/4, and NH/8 of the South Cambridgeshire Local Plan (2018) and policies 8, 56, 59, 70 and 71 of the Cambridge City Council Local Plan (2018).*

7. Soil Strategy Plan

No development shall commence until a Soil Strategy Plan has been submitted to and approved in writing by the County Planning Authority. The Soil Strategy Plan shall be based on available Agricultural Land Classification (ALC) data supplemented, as appropriate, with the findings of a detailed soil resource survey. The Strategy shall include proposed mitigation measures to manage soils in a sustainable way during construction, including measures for stripping, storing and re-use of topsoil where appropriate and protection of soils from contamination.

The Soil Strategy Plan shall subsequently be carried out in accordance with such approved details and shall be completed prior to the Travel Hub first being brought into public use or occupation of any part of the development hereby permitted, whichever is the sooner.

Reason: *To ensure the sustainable use of soils and protection of this natural resource in line with Paragraph 174 of the National Planning Policy Framework (2021) and in accordance with policies CC/6, NH/3 and NH/4 of the South Cambridgeshire Local Plan (2018) and policies 8 and 70 of the Cambridge City Council Local Plan (2018). The condition is pre-commencement as it is necessary to agree the details for the protection and handling of soils to ensure that this valuable natural resource is protected and used appropriately in line with national and local planning policy before any development commences.*

8. Land Levels

No development shall commence until details of the land levels, based on the principles set out within the agreed Earthworks Calculations and Review of Assessments Technical Note, Mott MacDonald, dated 1 December 2020 (received 4 December 2020), have been submitted to, and approved in writing by, the County Planning Authority.

The land levels shall subsequently be carried out in accordance with such approved details and shall be completed prior to the Travel Hub first being brought into public use or occupation of any part of the development hereby permitted, whichever is the sooner.

Reason: *To ensure the development is able to assimilate into its surroundings taking account of its Green Belt and heritage setting in accordance with policies S/4, CC/6, HQ/1, NH/2, NH/8 and NH/14 of the South Cambridgeshire Local Plan (2018) and policies 8, 56 and 59 of the Cambridge City Council Local Plan (2018). The condition is pre-commencement as it is necessary to agree the land levels before any development commences.*

9. Detailed Biodiversity and Ecological Design, including a Landscape and Ecological Management Plan

No development shall commence until a detailed Biodiversity and Ecological Design, to include a Landscape and Ecological Management Plan (LEMP), is submitted to, and approved in writing by, the County Planning Authority. This shall include, but not be limited to, the following:

- (a) Construction Environment Management Plan for Biodiversity (based on BS202:2013 standard, or its successor in title) detailing proposed protection and mitigation measures during construction for designated sites (River Cam County Wildlife Site), Trumpington Meadows Country Park, protected species (bats, badger, reptiles, breeding birds, wintering birds, otter) and national / local priority species and habitats.
- (b) Detailed ecological design, including detailed drainage scheme (discharge into coprolite ponds, swales and discharge into River Cam via new outfall, including the proposed reinstatement of land used for the drainage scheme) and design of badger/otter tunnel(s) or underpass(es).
- (c) detailed planting scheme for ecological mitigation / enhancement areas.
- (d) Biodiversity Impact Assessment (based on the Defra 2.0 biodiversity impact calculator metric or its successor in title) demonstrating a minimum positive biodiversity net gain unit score of 10% above the pre-development baseline.
- (e) Landscape and Ecological Management Plan (LEMP), which shall include (but not be limited to):
 - i. A detailed planting scheme, including species list;
 - ii. Details of plant establishment for a period of 5 years;
 - iii. Long term design objectives, management responsibilities and maintenance schedules for all landscape areas, including copies of agreements with landowners that provide details of the location extent and maintenance of replacement habitat mitigation (outside of the red line boundary) so as to ensure there is no net loss in biodiversity;
 - iv. A scheme detailing how the new habitat will be established, managed and maintained for a period of 25 years;

- v. A habitat monitoring scheme to report to relevant bodies 2, 5, 10, 15, 20, and 25 years after works are started. If desired conditions are not reached within predicted timeframes remedial actions shall be submitted to and agreed in writing by the County Planning Authority as part of this monitoring requirement; and
- vi. A scheme for the provision of annual reports, to be submitted to the County Planning Authority, to report on the ongoing habitat management, as agreed in part v. above, for a period of 25 years.

The approved detailed Biodiversity and Ecological Design scheme, including the LEMP, shall be implemented in full for a minimum of 25 years from the first available planting reason after the date that the Travel Hub is first brought into public use, or occupation of any part of the development hereby permitted, whichever is the sooner.

Reason: *In the interests, of visual amenity and to ensure that landscaping becomes appropriately established on site; that any affected footpaths are restored appropriately including that the drainage route will go back to the path; for the protection of existing species and the ecological and biodiversity value of the area including biodiversity net gain is achieved; and to ensure that the construction works do not adversely impact on protected species such as bats in accordance with Policies HQ/1, NH/2 and NH/4 of the South Cambridgeshire Local Plan (2018) and policies 8, 56, 59, 69, 70 and 71 of the Cambridge City Council Local Plan (2018). The condition is pre-commencement as it is necessary to agree the detailed information in relation to the mitigation and protection of biodiversity prior to the construction phase, so they must be agreed before any development commences.*

10. Access Management and Maintenance Plan

No development shall commence until an Access Management and Maintenance Plan (AMMP) has been submitted to, and approved in writing by, the County Planning Authority. The AMMP shall include, but not be limited to, the following:

- Details setting out mitigation measures to include the new fencing and field gates agreed as part of the Letter of Comfort dated 19 July 2021 to ensure the protection of Trumpington Meadows Country Park and Nature Reserve from increased visitor pressure;
- Detailed design of the access routes, landscaped areas (including set areas for dogs off leads), facilities (such as picnic benches, seating areas and bins) and signage and visitor / interpretation boards within the application boundary in line with condition 5, to ensure the site complements and avoids unnecessary pressures on the adjacent country park;
- An implementation timetable and review triggers to align with the LEMP monitoring set out in condition 9 above.

The Access Management and Maintenance Plan shall be implemented in full, in accordance with the approved timetable and review triggers, for the lifetime of the development hereby permitted.

Reason: *In the interests of biodiversity net gain and to ensure that the development does not impact adversely on existing species and the ecological and biodiversity value of the adjacent area in accordance with Policies HQ/1, NH/2 and NH/4 of the South Cambridgeshire Local Plan (2018) and policies 8, 56, 59, 70 and 71 of the Cambridge City Council Local Plan (2018). The condition is pre-commencement as it is necessary to agree the detailed*

information in relation to the Access Management and Maintenance Plan; and the detailed information in relation to the biodiversity net gain achieved from the scheme from the outset prior to the construction phase to ensure the area is designed to avoid unnecessary pressure being placed on the adjacent country park, which is why it must be agreed and in place before any development commences.

11. Permitted Construction Hours

All construction works shall be limited to 0800 hours to 1800 hours Monday to Friday and 0800 hours to 1300 hours on Saturday and at no time on Sundays, Bank or Public Holidays.

Reason: *To ensure the environmental impact of the construction of the development is adequately mitigated and in the interests of the amenity of nearby residents/occupiers. In accordance with policy SC/10 of the South Cambridgeshire Local Plan (2018) and policy 35 of the Cambridge City Council Local Plan (2018).*

12. No Bonfires or Burning of Waste

During the construction and operational phases there shall be no bonfires or burning of waste on site.

Reason: *To ensure the environmental impact of the construction of the development is adequately mitigated and in the interests of the amenity of nearby residents/occupiers. In accordance with policy SC/10 of the South Cambridgeshire Local Plan (2018) and policy 35 of the Cambridge City Council Local Plan (2018).*

13. Contamination Remediation Strategy – unexpected contamination

If during the development contamination not previously identified is found to be present at the site, such as putrescible waste, visual or physical evidence of contamination of fuels/oils, backfill or asbestos containing materials, then no further development shall be carried out until the developer has submitted, and obtained written approval from the County Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with.

The remediation strategy shall be implemented as approved to the satisfaction of the County Planning Authority.

Reason: *To ensure that risks from unexpected land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with policy SC/11 of the South Cambridgeshire Local Plan (2018) and policy 33 of the Cambridge City Council Local Plan (2018).*

14. Detailed Highway Drawings

No development shall commence until a detailed technical design scheme (including for the provision of badger/otter tunnel(s) or underpass(es)) for the following has been submitted to, and approved in writing by, the County Planning Authority:

- The proposed non-motorised user path between the A10 and A1309 and the new bridge to be constructed over the M11;
- The proposed signalled vehicular access junction off the A10 to the new Travel Hub site;
- The proposed Public Transport Route between the new Travel Hub site and the A1309 Hauxton Road/Addenbrooke's Road signal junction, including the proposed improvement works to the existing accommodation bridge over the M11;
- The proposed highway improvement works on the A10, at the M11, Junction 11 and on the A1309 Hauxton Road; and
- The proposed improvement works at the A1309 Hauxton Road/Addenbrooke's Road signal junction.

The approved works shall be carried out in full accordance with the agreed scheme prior to the Travel Hub first being brought into public use or occupation of any part of the development hereby permitted, whichever is the sooner.

Reason: *To ensure that the M11 trunk road continues to serve its purpose as a part of a national system for through traffic in accordance with Section 10 of the Highways Act 1980, and to satisfy the reasonable requirements of road safety on the A10 trunk road; and in the interests of highway safety in line with policy TI/2 of the South Cambridgeshire Local Plan (2018) and policy 81 of the Cambridge City Council Local Plan (2018); and to ensure that the development does not impact adversely on the protection of existing species and the ecological and biodiversity value of the adjacent area in accordance with Policies HQ/1, NH/2 and NH/4 of the South Cambridgeshire Local Plan (adopted September 2018) and policies 56, 59, 70 of the Cambridge City Council Local Plan (2018). The condition is pre-commencement as it is necessary to agree the detailed information in relation to the highway improvements to ensure that the necessary highway safety benefits can be achieved, which is why they must be agreed before any development commences.*

15. Non-Motorised User Route

No development shall commence until the ownership and Right of Way details of the new Non-Motorised User (NMU) route between the A10 and the A1309 Hauxton Road, in particular the proposed section east of the new NMU bridge to the A1309 Hauxton Road, have been submitted to, and approved in writing by, the County Planning Authority.

The details shall include the design relating to the entrance and exit points for the active NMU travel route through the site, any access controls for it and a timetable for implementation. The approved details shall be implemented in full, in accordance with the agreed timetable.

Reason: *To ensure that the Non-Motorised User Route is delivered and connected to the wider Rights of Way networks in the area to ensure that there is safe access and egress for all users in line with the guidance set out in Local Transport Note 1/20, or its successor in title, and in the interests of highway safety in accordance with policy TI/2 of the South Cambridgeshire Local Plan (2018) and policy 81 of the Cambridge City Council Local Plan (2018). The condition is pre-commencement as it is necessary to agree the detailed information in relation to the rights of way network to ensure that the necessary access benefits can be achieved, which is why they must be agreed before any development commences.*

16. Internal Layout

No development shall commence until a detailed scheme for the internal layout of the new Travel Hub site has been submitted to, and approved in writing by, the County Planning Authority.

The approved works shall be carried out in full accordance with the agreed scheme prior to the Travel Hub first being brought into public use or occupation of any part of the development hereby permitted, whichever is the sooner.

Reason: *To ensure that the internal arrangements are sufficient to take traffic off the highway safely and deliver the necessary transport infrastructure in accordance with policies TI/2 and TI/3 of the South Cambridgeshire Local Plan (2018) and policies 81 and 82 of the Cambridge City Council Local Plan (2018). The condition is pre-commencement as it is necessary to agree the detailed information in relation to the highway improvements to ensure that the necessary highway infrastructure can be achieved, which is why it must be agreed before any development commences.*

17. Implementation of the Low Emission Strategy (LES)

No development shall commence until the final details of the Low Emission Strategy, based on the principles set out in Section 9 of the Transport Assessment by Mott MacDonald dated 28 May 2020, have been submitted to, and approved in writing by, the County Planning Authority. As a minimum the final measures shall include the following:

- a. Provision of proposed 108 Electric Vehicle Charging Points;
- b. Provision of proposed 326 Cycle Parking; and
- c. An implementation plan and timetable for each of the proposed measures.

In addition to the above, the final details shall demonstrate how the proposal will facilitate sustainable transport modes to and from the Travel Hub as outlined in section 9.2 to 9.5 of the Transport Assessment (set out below for ease of reference):

- i. Provision of a 5m wide and non-motorised user route over the M11 between the A10 and the A1309/Hauxton Road.
- ii. Provision of cycle parking lockers and cycle storage to encourage Cycle and Ride trips at the Travel Hub.
- iii. Provision for additional 12 new public transport vehicles an hour serving the Travel Hub.

The delivery and implementation of the above measures shall subsequently be carried out in accordance with the approved details and implementation timetable, to ensure any impacts of the Travel Hub on local air quality is minimised.

Reason: *In the interests of reducing impacts of developments on local air quality and encouraging sustainable forms of transport in accordance with policies SC/12 and TI/2 of the South Cambridgeshire Local Plan (2018); the Greater Cambridge Sustainable Design and Construction SPD 2020 (section 3.6. Pollution); and policies 36 and 81 of the Cambridge City Council Local Plan (2018). The condition is pre-commencement as it is necessary to agree the Low Emission Strategy from the outset and maintain an emphasis on encouraging sustainable forms of transport before any development commences.*

18. Monitoring of cycle parking provision

Prior to the Travel Hub first being brought into public use, or occupation of any part of the development hereby permitted, whichever is the sooner, a scheme for the monitoring of cycle parking provision within the Travel Hub site shall be submitted to, and approved in writing by, the County Planning Authority.

Within one year of the Travel Hub first being brought into public use, or occupation of any part of the development hereby permitted, as identified by condition 2, the monitoring survey as approved, will be undertaken to assess cycle parking capacity within the Travel Hub site. This survey shall be repeated once a year, for 15 years following opening.

If, at any time, the monitoring survey reports that cycle parking capacity within the Travel Hub site is lower than 20% of the total number of cycle parking spaces, then a programme for implementation of additional cycle parking facilities at the site shall be submitted to, and agreed in writing by, the County Planning Authority. The additional cycle parking spaces shall be implemented within six months of the date of the monitoring survey.

Reason: *To ensure that the cycling infrastructure and provision is achieved, and monitoring maintained, in accordance with policy TI/3 of the South Cambridgeshire Local Plan (2018) and policy 82 of the Cambridge City Council Local Plan (2018).*

19. Details of bus and coach service provision

Prior to the Travel Hub first being brought into public use, or occupation of any part of the development hereby permitted, whichever is the sooner, details of the bus and coach service provision, routes, to serve the site shall be submitted to, and approved in writing by, the County Planning Authority.

Reason: *To ensure that the sustainable transport information is understood in accordance with policy TI/2 of the South Cambridgeshire Local Plan (2018) and policy 81 of the Cambridge City Council Local Plan (2018).*

20. Programme of Archaeological Works

No development shall commence until the applicant, or their agents or successors in title, has implemented a programme of archaeological work that has been secured in accordance with a written scheme of Investigation (WSI), which has been submitted to and approved in writing by the County Planning Authority. For land that is included within the WSI, no development shall take place other than under the provisions of the agreed WSI, which shall include:

- a) the statement of significance and research objectives;
- b) The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works;
- c) The timetable for the field investigation as part of the development programme; and
- d) The programme and timetable for the analysis, publication & dissemination, and deposition of resulting material.

Reason: *To protect any underlying archaeology in the area and secure appropriate mitigation such as interpretation boards to explain the wider historic significance in accordance with policy NH/14 of the South Cambridgeshire Local Plan (2018) and policy 61 of the Cambridge*

City Council Local Plan (2018). The condition is pre-commencement as it is necessary to agree the Programme of Archaeological Works in order to ensure that the underlying archaeology is protected before any development commences.

21. Protection of listed milestones

No development shall commence until the details of the measures to be put in place to ensure that the two grade II Listed milestones will not be harmed as a result of the construction phase of the development shall be submitted to, and approved in writing by, the County Planning Authority.

The approved mitigation measures shall be carried out in full and retained in place during the construction phases.

Reason: *In the interests of safeguarding the two grade II listed milestones in accordance with policy NH/14 of the South Cambridgeshire Local Plan (2018) and policy 61 of the Cambridge City Council Local Plan (2018). The condition is pre-commencement as it is necessary to agree the mitigation measures to ensure that the grade II listed milestones will not be harmed during the construction phase before any development commences.*

22. Lord's Bridge Radio Observatory safeguarding

No development shall commence until details of the transmitters to be used in the communication with buses; and convertors to be incorporated within the solar array; have been submitted to, and approved in writing by, the County Planning Authority, to ensure that interference and suppression measures can be incorporated where necessary.

The approved mitigation measures shall be carried out in full in accordance with the agreed details prior to the Travel Hub first being brought into public use or occupation of any part, whichever is the sooner.

Reason: *In the interests of safeguarding the Lord's Bridge Radio observatory and reducing the risk of any radio interference in accordance with policy TI/7 of the South Cambridgeshire Local Plan (2018) and policy 39 of the Cambridge City Council Local Plan (2018). The condition is pre-commencement as it is necessary to agree the details of the mitigation measures for the transmitters and converters in order to ensure that the Lord's Bridge Radio Observatory will not be affected by the operational phase of the Travel Hub before any development commences.*

23. Surface Water Drainage

No above ground works shall commence until a surface water drainage scheme for the site, based on sustainable drainage principles, has been submitted to and approved in writing by the County Planning Authority. The scheme shall be based upon the principles within the agreed Drainage Strategy Report prepared by SKANSKA (ref: SIS/5020323/CSWTH Rev A) dated 2 June 2020.

The scheme shall subsequently be implemented in full accordance with the approved details prior to the Travel Hub first being brought into public use, or occupation of any part of the development hereby permitted, whichever is the sooner, for the lifetime of the development.

Reason: To ensure that the proposed development can be adequately drained and to ensure that there is no increased flood risk on or off site resulting from the proposed development in accordance with policies CC/7 and CC/8 of the South Cambridgeshire Local Plan (2018) and policy 31 of the Cambridge City Council Local Plan (2018).

24. Noise Impact Assessment

Prior to the Travel Hub first being brought into public use, or occupation of any part of the development hereby permitted, whichever is the sooner, an assessment of the noise impact of plant and or equipment including any renewable energy provision sources such as any air source heat pump or wind turbine on the proposed structures and a scheme for insulation as necessary, in order to minimise the level of noise emanating from the said plant and or equipment shall be submitted to, and approved in writing by, the County Planning Authority.

Any noise insulation scheme as approved shall be fully implemented prior to the Travel Hub first being brought into public use, or occupation of any part of the development hereby permitted, whichever is the sooner, and shall thereafter be maintained in strict accordance with the approved details and shall not be altered without prior approval.

Reason: To protect the amenities of nearby sensitive receptors in accordance with policy SC/10 of the South Cambridgeshire Local Plan (2018) and policy 35 of the Cambridge City Council Local Plan (2018).

25. Lighting

Prior to the installation of any lighting, a lighting scheme for the development shall be submitted to, and approved in writing by, the County Planning Authority. The lighting scheme shall include details for the appearance of the height, type, position and angle of glare of any of the proposed final lighting within the Travel Hub site, including horizontal and vertical isolux contours; and, to ensure that it is designed sensitively for wildlife shall include zero lighting spill onto the adjacent country park / nature reserve; so all sensitive receptors can be considered and protected.

The detailed measures as approved shall be implemented in accordance with the agreed scheme and maintained thereafter for the lifetime of the development.

Reason: In order to safeguard the Green Belt, and the amenity of all sensitive receptors, including biodiversity, in respect of possible adverse effects of lighting glare from any future lighting provision proposed for the travel hub in accordance with policies S/4, HQ/1, SC/9, NH/4 and NH/8 of the South Cambridgeshire Local Plan (2018) and policies 4, 8, 34 and 70 of the Cambridge City Council Local Plan (2018).

26. CCTV

Prior to the installation of any CCTV, a CCTV scheme for the development shall be submitted to, and approved in writing by, the County Planning Authority. The CCTV scheme shall include details for the appearance of the height, type, and position within the Travel Hub site.

The details as approved shall be implemented in accordance with the agreed scheme and maintained thereafter for the lifetime of the development.

Reason: In order to ensure public safety within the Travel Hub site in accordance with policy HQ/1 of the South Cambridgeshire Local Plan (2018) and policy 56 of the Cambridge City Council Local Plan (2018).

27. Solar Panel Layout to comply with Glint and Glare Assessments

The proposed solar panels shall be constructed in strict accordance with the design shown on the Travel Hub Sections (Solar car ports), Skanska Technology, ref: H19532-SKA-GEN-ZZ-DR-CH-0702-S4 Rev P04, dated 19 March 2020, and Travel Hub General Arrangement Plan, Skanska Technology, ref: H19532-SKA-GEN-ZZ-DR-CB-0700-S4 Rev P13, dated 25 September 2020 (received 21 October 2020); and the panels shall be laid out in accordance with this plan subject to the following parameters:

- Maximum panel height from the ground level: 3.6 metres; and
- Minimum distance between car ports (measured panel to panel): 6 metres.

The mitigation landscaping referenced in section 9.4 Overall Conclusions and Recommendations of the Glint and Glare Assessment prepared by PagerPower Urban & Renewables, dated 26 February 2020 shall be retained and maintained for the full duration of the solar panels being used.

Reason: *To ensure that the development does not introduce any additional adverse effects in terms of its visual or ecological impact and is carried out in line with what was assessed in the Glint and Glare document in accordance with policies CC/2, SC/9 and TI/6 of the South Cambridgeshire Local Plan (2018) and policies 8, 29 and 34 of the Cambridge City Council Local Plan (2018).*

28. Decommissioning

In the event that the solar panels on site are no longer required for the production of energy, not less than 12 months prior to the planned cessation of the solar generation operations hereby permitted, written notice of the planned cessation shall be given to the County Planning Authority.

Not less than 6 months prior to the planned cessation of the solar generation operations, a Decommissioning Environmental Management Plan (DEMP) shall be submitted to, and approved in writing by, the County Planning Authority. The DEMP shall include, but not be limited to, the following details:

- a. The demolition / dismantling and removal of the plant;
- b. Site waste management including measures to recycle materials on the site;
- c. Hours of working;
- d. Car parking arrangements;
- e. Traffic management;
- f. Measures to control lighting, noise, dust, odours and fumes in order to minimise any adverse effects on the amenity of neighbours or surrounding uses;
- g. Temporary storage compounds and stockpile areas;
- h. Measures to protect trees and hedgerows;
- i. Temporary fencing and means of enclosure;
- j. Measures to minimise the pollution of surface and ground water and to deal with any areas of contamination;
- k. A restoration scheme; and

I. A programme for implementation.

Decommissioning shall not commence until the DEMP has been approved in writing by the County Planning Authority and the Site shall be decommissioned and restored in full accordance with the approved DEMP and timetable thereafter.

Reason: *The application has been assessed and determined with the inclusion of solar panels on the site, but on the basis of decommissioning of these panels, in order to secure the removal of all materials, plant and equipment associated with the solar generation operations, this condition has been added to ensure that there is no long term visual, residential amenity or ecological impact in accordance with policy CC/2 of the South Cambridgeshire Local Plan (2018).*

Informatives

Letter of Comfort

This permission is based on the terms of the Letter of Comfort dated 19 July 2021, for the provision of off-site stock fencing and gates (as shown on the plan Appendix A of the Letter of Comfort); on-site wayfinding, benches, bins and signage; and highway maintenance requirements.

Environmental Permitting Regulations (2016)

The proposed new outfall to the River Cam is likely to fall under the terms of the Environmental Permitting Regulations (EPR) (2016) and so a permit may be required from the Environment Agency for these works.

The EPR are a risk-based framework that enables the Environment Agency to focus regulatory effort towards activities with highest flood or environmental risk. Lower risk activities will be exempt while higher risk activities will require a permit. The proposed works may fall under one or more of the below:

- Exemption
- Standard Rules Permit
- Bespoke permit

For information on the permitting requirements of the works please contact the Environment Agency: PSO-Brampton@environment-agency.gov.uk

Additional information on how to apply for a permit and application forms can be found on the Environment Agency's website at: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>

Ordinary Watercourse Consent

Constructions or alterations within an ordinary watercourse (temporary or permanent) require consent from the Lead Local Flood Authority under the Land Drainage Act 1991. Ordinary watercourses include every river, drain, stream, ditch, dyke, sewer (other than public sewer) and passage through which water flows that do not form part of Main Rivers (Main Rivers are

regulated by the Environment Agency). The applicant should refer to Cambridgeshire County Council's Culvert Policy for further guidance:

<https://www.cambridgeshire.gov.uk/business/planning-and-development/water-minerals-and-waste/watercourse-management/>

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

Pollution Control

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

Guidance on information required to satisfy condition 23

Surface Water Drainage strategy will also need to include:

- a) Full results of the proposed drainage system modelling in the QBAR, 3.3% Annual Exceedance Probability (AEP) (1 in 30) and 1% AEP (1 in 100) storm events (as well as 1% AEP plus climate change), inclusive of all collection, conveyance, storage, flow control and disposal elements and including an allowance for urban creep, together with an assessment of system performance;
- b) Detailed drawings of the entire proposed surface water drainage system, including levels, gradients, dimensions and pipe reference numbers;
- c) Full details of the proposed attenuation and flow control measures;
- d) Site Investigation and test results to confirm infiltration rates;
- e) Temporary storage facilities if the development is to be phased;
- f) A timetable for implementation;
- g) Details of overland flood flow routes in the event of system exceedance, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupants;
- h) Full details of the maintenance/adoption of the surface water drainage system; and
- i) Relevant permissions from third party asset owners to allow connections into their systems.

Water efficient sanitary ware

It is noted that toilet provision will be made as part of the Travel Hub building being provided on site. As water use will be relatively low, it is not considered necessary for water use to be conditioned for this proposal, but it is recommended that water efficient sanitary ware be specified for the toilets, making reference to the appropriate specification in Table 2.2 of Part G of the Building Regulations

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/504207/BR_PDF_AD_G_2015_with_2016_amendments.pdf).

Archaeology

Partial discharge of condition 20 can be applied for once the fieldwork at Part c) has been completed to enable the commencement of development.

Part d) of the condition shall not be discharged until all elements have been fulfilled in accordance with the programme set out in the Written Scheme of Investigation.

General Contaminative Land Informative:

Contaminated land should be considered and assessed in accordance with government / industry best practice and technical guidance and the 'Greater Cambridge Sustainable Design and Construction Supplementary Planning Document, Adopted January 2020' – available online at:

<https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/sustainable-design-and-construction-consultation-spd/>

Further specialist advice and comments on contaminated land pertinent to this site can be obtained from Helen Bord or Claire Sproats - Scientific Officers, SCDC Waste and Environment – Contaminated Land Telephone No: 01954 713444 or email contamland@scambs.gov.uk

24 hour working

If 24 hour working on the new Non-Motorised User bridge or road / bridge improvements are required, the following information will need to be submitted for approval to allow working outside of those controlled by condition 11:

- a) Results of a survey of noise sensitive properties (as agreed between the applicant and the County Planning Authority) identified as being in close proximity to the works with distance data to be provided;
- b) Details of the noise mitigation measures to be implemented prior to the works;
- c) Details of any lighting required as part of the works and the proposed locations for these, including any light spill anticipated;
- d) A timetable for the proposed works, including dates and times of the specific activities proposed, including the removal of any materials off site; and
- e) Biodiversity Method Statement setting out mitigation for impact on ecology and how it will accord with the Construction Environment Management Plan for Biodiversity (condition 9 criterion (a)).

If approval is granted, a letter will be required to be sent by the applicant to any affected sensitive properties or wildlife groups (as agreed between the applicant and the County Planning Authority) at least 5 working days before commencement of construction of the 24 hour working proposals which shall include emergency contact details and the details of the mitigation measures to be put in place as identified and approved in a) to e) above.

Lighting Guidance

Artificial lighting on and off site must meet the Obtrusive Light Limitations for External Lighting Installations contained within the Institute of Lighting Professionals (ILP) Guidance Notes for the Reduction of Obtrusive Light – GN01:2011 (or as superseded).

Sustainable Design and Construction

It is recommended for the Applicant to have consideration of the 'Greater Cambridge Sustainable Design and Construction Supplementary Planning Document, Adopted January 2020' - available online at:

<https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/sustainable-design-and-construction-consultation-spd/>

Overall, any detailed design matters should be in accordance with the appropriate Design Codes/SPDs published.

Highways England Third Party Works (Section 278 Agreements)

If as part of development proposals, there is a need to alter the trunk road network either to provide access on to it or to provide improvements to the road and its junctions, in order to mitigate the impact of the development, then the developer will need to enter in an arrangement with Highways England to procure and deliver these works. The applicant's attention is drawn to the information included in the letter from Highways England dated 11 March 2021.

Airport safeguarding

The applicant's attention is drawn to the information included in the letter from the Imperial War Museum (IWM) Duxford dated 22 April 2021. This highlights the need to maintain contact with the IWM Duxford Airfield during the construction period in the case of any crane or drone usage, or road closures in case this effects their operations.

Lord's Bridge Radio Observatory safeguarding

The applicant's attention is drawn to the information included in the response from the University of Cambridge dated 18 March 2021. This highlights the need to maintain contact with the Lord's Bridge Radio Observatory to ensure that if radio interference and / or suppression measures prove to be necessary, these can be incorporated within the design with their approval in line with condition 22.

Compliance with paragraph 38 of the National Planning Policy Framework (2021).

The applicant sought pre-application advice. The County Planning Authority has worked proactively with the applicant to ensure that the proposed development is acceptable in planning terms. The applicant has responded positively to the advice and recommendations provided and amendments have been made (where required) to satisfy concerns raised. All land use planning matters have been given full consideration, which resulted in overall support for the development proposal from statutory consultees.

Source Documents

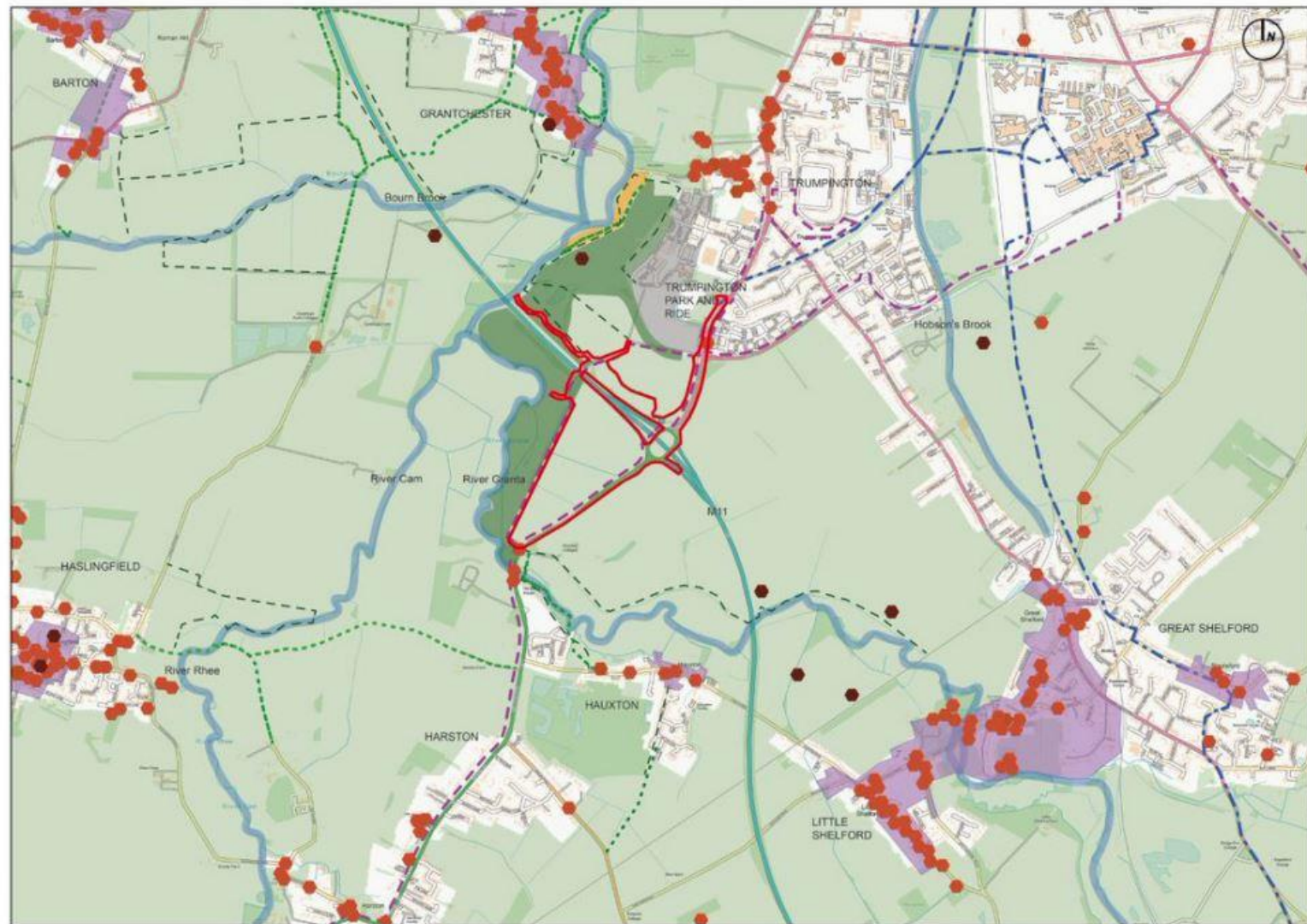
[South Cambridgeshire Local Plan adopted September 2018](#)

[Cambridgeshire and Peterborough Minerals and Waste Core Strategy adopted July 2011](#)

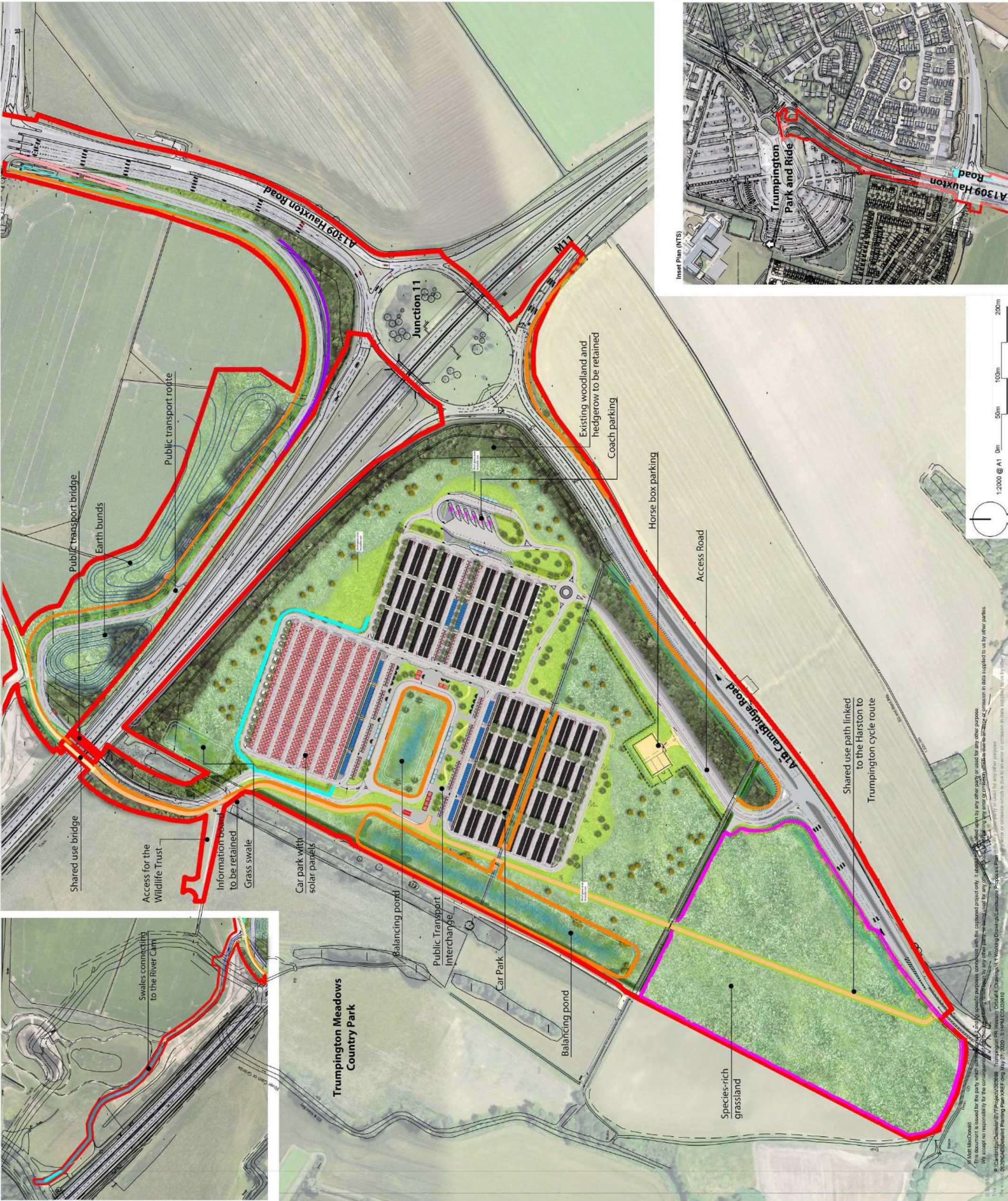
[Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Plan adopted February 2012](#)

[Local Transport Plan | Cambridgeshire & Peterborough Combined Authority \(cambridgeshirepeterborough-ca.gov.uk\)](#)

CAMBRIDGE SOUTH WEST TRAVEL HUB CONSTRAINTS AND OPPORTUNITIES



- | | | | | | | |
|----------------------------------|-------------------|-----------------|----------------------|------------------------|---------------------------------|------------------|
| CSWTH red line boundary | Green Belt | Nature Reserve | Under Construction | Cycle Route | National Cycle Network Route 11 | Listed Buildings |
| Trumpington Meadows Country Park | Conservation Area | Permissive Path | Public Rights of Way | Existing Water Courses | Scheduled Monuments | |



Notes

1. All dimensions are in metres (m) unless stated otherwise.
2. All levels are in metres Above Ordnance Datum (mAOD).
3. Do not scale from this drawing.
4. Ornamental planting within the travel hub and marginal planting within the sustainable drainage ponds and swales are detailed in the Landscape and Ecological Management Plan.
5. Refer to Arboricultural Report and tree protection plans for details on tree removal and the protection of trees to be retained during construction.
6. Exact location of planting is not shown. Setting out to be agreed on site with a Landscape Architect.

Key to symbols

- Application site boundary
- Existing retained hedgerow
- Tree (girth 14-16 and 16-18)
- Tree (feathered)
- Native species woodland (incorporating existing boundary planting)
- Native species hedgerow
- Ornamental shrub and herbaceous planting
- Species rich grassland
- General purpose grassland
- Damp grassland
- Reed planting
- Marginal planting areas
- Post and wire fencing
- Stock proof fencing
- Post and 3 rail fencing (to Highways England standards)
- Anti-dazzle fence

P3	21.08.20	GL	For submission	Jo M	KG
P2	28.05.20	HL	Draft for review	Jo M	KG
P1	24.04.20	FC	First draft for comment	Jo M	KG
Rev	Date	Drawn	Description	Chk'd	App'd

M
MOTT
MACDONALD

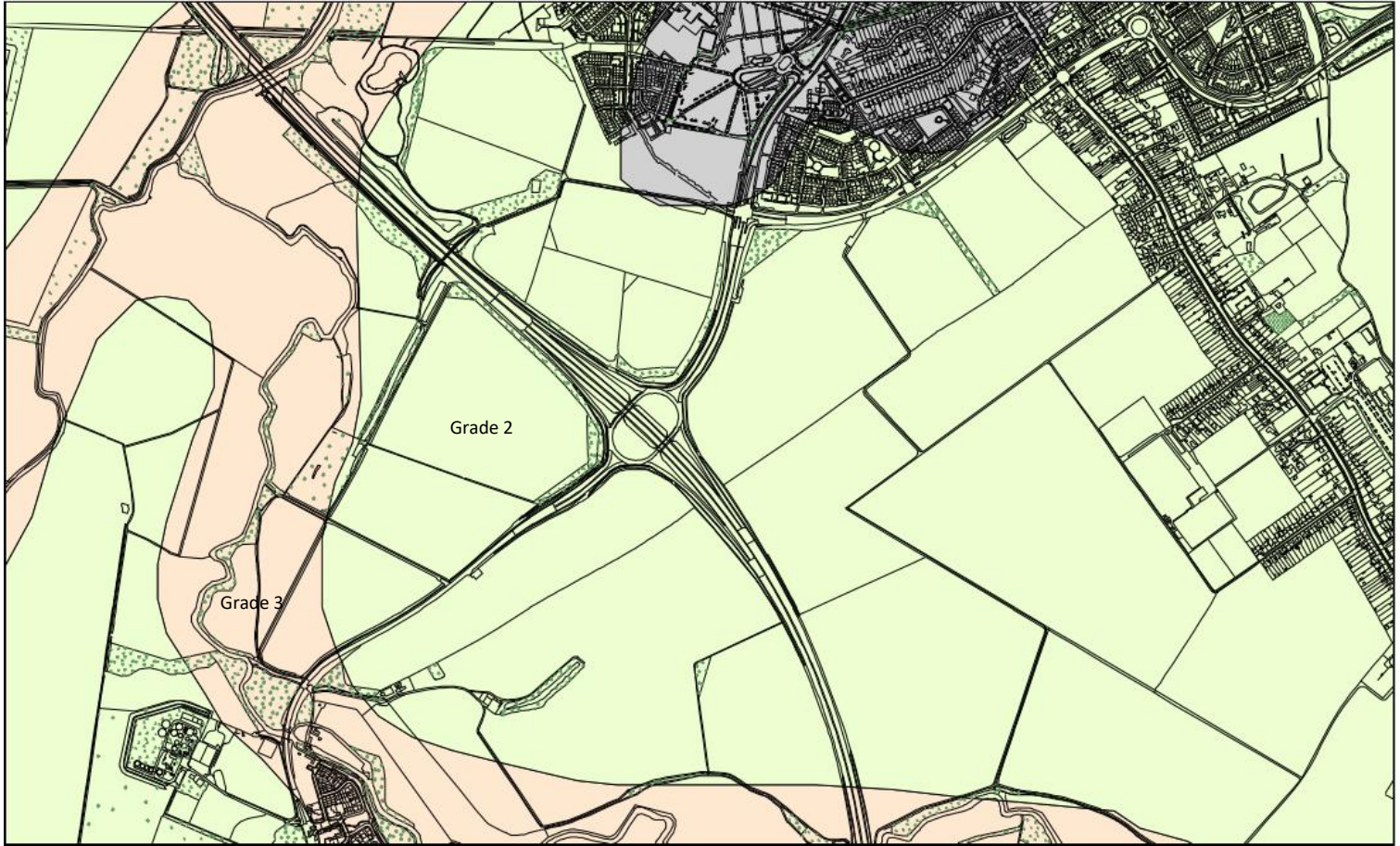
22 Station Road
Cambridge
CB1 2JD
United Kingdom
T +44 (0)1223 463500
F +44 (0)1223 461007
W mottmac.com

Client



Cambridge South West Travel Hub
Figure 4
Landscape Masterplan

Designed	F Churchyard	FC	Eng check	J Morrison	Jo M
Drawn	F Churchyard	FC	Coordination	K Gareau	KG
Dwg check	J Morrison	Jo M	Approved	J Montgomery	JM
Scale at A1	Status	PRE	Rev	P3	STD
1:2000					
Drawing Number					
413752-MMD-LAN-XX-DR-LV-0012					



Date: 19/07/2020

Contact: Tim Watkins
Direct dial: 01223 706575
E Mail: Timothy.watkins@cambridgeshire.gov.uk

Emma Fitch
Assistant Director, Planning Growth &
Environment
Environment and Commercial
Place and Economy
Cambridgeshire County Council
SH1315 Shire Hall, Castle Street
Cambridge
CB3 0AP

Place and Economy
Executive Director, Steve Cox

Major Infrastructure Delivery
SH1311
Shire Hall
Cambridge
CB3 0AP

Tel: 01223 699069

Dear Ms Fitch

**Application under Regulation 3 of the Town and Country Planning General
Regulations 1992 for the Proposed Cambridge South West Travel Hub -
CCC/20/040/FUL**

I am writing further to the consultation response provided by Cambridgeshire County Councils Transport Assessment team and the Wildlife Trust in the planning application with reference number CCC/20/040/FUL (the Planning Application).

On behalf of the applicant I confirm, in the form of this letter, that the applicant gives a written and binding commitment that a commuted sum (the Commuted Sum) will be paid by the Greater Cambridge Partnership (GCP) to Cambridgeshire County Council (CCC) for the ongoing maintenance and running costs of the infrastructure constructed as part of the Planning Application (the Asset).

The applicant confirms that the highways matters listed below are accepted:

1. The value of the Commuted Sum will be agreed between the Applicant and the Council following completion of the detailed design of the Infrastructure and prior to the handover of the Infrastructure to the Council.
2. The Commuted Sum will be used for the ongoing maintenance and operation of the Infrastructure for a period of not less than 60 years.
3. The detailed design of the Infrastructure will be subject to the Design Manual for Roads (DMRB) standards and will be reviewed and confirmed in writing by the Council as part of an agreed process and will be a pre-commencement planning condition attached to the planning permission.

On behalf of the applicant I also confirm, in the form of this letter, that the applicant gives a written and binding commitment that should the planning application be granted and subsequently implemented there will be a provision for:

1. Stock Fencing and Field Gates around the meadows (as shown on the attached plan in appendix A). The proposed stock fencing and gates will be erected within this area prior to the first use of the Travel Hub site, in accordance with the area shown on the plan within Appendix A.
2. Wayfinding and signage within the application site as part of the long-term management and maintenance of the site by CCC, in accordance with the details set out within the LEMP submitted as part of the application or as superseded by any planning conditions.
3. Biodiversity Net Gain and landscaping will be delivered as will be required should planning permission be granted

This letter confirms the GCP's intention by way of a letter of comfort to the CCC to ensure that the Commuted Sum and mitigation measures set out within the content of this correspondence will be agreed and secured from commencement of use of the proposed development.

Yours sincerely



Tim Watkins
Senior Delivery Project Manager,
Greater Cambridge Partnership

Proposed Wildlife Trust fencing area
Application Reference: CCC/20/040/FUL



Promap
LANDMARK INFORMATION

Ordnance Survey Crown Copyright 2021. All rights reserved.
Licence number 100022432.
Plotted Scale - 1:7500. Paper Size – A4

Summary of Decisions Made Under Delegated Powers

To: Planning Committee

Date: 29 July 2021

From: Assistant Director, Planning, Growth & Environment

Electoral division(s): All

Purpose: To consider the above

Recommendation: The committee is invited to note the report

Officer contact:
Name: Deborah Jeakins
Post: Principal Enforcement and Monitoring Officer
Email: [Link to the email address for Deborah Jeakins](#)
Tel: 01223 715544

1.0 Introduction

- 1.1 At the committee meeting on 31 January 2005 it was agreed that a brief summary of all the planning applications that have been determined by the Head of Strategic Planning under delegated powers would be provided.
- 1.2 The Scheme of Delegation set out in Part 3D of the Council's Constitution describes the extent and nature of the authority delegated to the Executive Director: Place and Economy to undertake functions on behalf of Cambridgeshire County Council. The delegations are made either by the Full Council or one of its committees. The Executive Director, considered it necessary and expedient, to authorise the Head of Strategic Planning (now the Assistant Director, Planning, Growth & Environment) to undertake functions on his behalf. These authorisations are included within a written schedule of authorisation published on the Council's website which is available at the following link for Place and Economy:
<https://www.cambridgeshire.gov.uk/council/council-structure/council-s-constitution/>.

2.0 Summary of Decisions

- 2.1 Ten applications have been granted planning permission under delegated powers during the period between 30/03/21 and 08/07/21 as set out below:

1. CCC/21/013/VAR- Retention of a 12.3 metre x 8.1 metre 4 bay modular classroom for a temporary period.

Informative: Section 73 application to develop land without complying with condition 1 of planning permission E/3002/19/CC to allow retention of a 12.3 metre x 8.1 metre mobile classroom for a temporary period until 31 August 2024.

Location – The Lantern Community Primary School, Nene Road, Ely, CB6 2WL.

Decision granted 08/04/21.

For further information please contact Stanley Gono 01223 699227.

2. CCC/21/012/VAR- Retention of a 7-bay modular classroom building for a temporary period and permanent provision of Play Area Canopy and 2 Playground Extensions and relocation of existing shed.

Informative: Section 73 application to develop land without complying with condition 1 of planning permission 20/00007/VCR3(to retain of the mobile classroom for a temporary period until 31 August 2026).

Location- Ely St Johns Community Primary School, St Johns Road, Ely, CB6 3BW.

Decision granted 13/04/21.

For further information please contact Luke Walstow 01223 703861.

3. CCC/21/014/VAR- The retention of a 7-bay (21m x 8.7m) mobile classroom for a temporary period with the retention of two scooter pods.

Informative: Section 73 application to develop land without complying with condition 3 of planning permission E/3002/16/CC to retain the mobile classroom for a temporary period until 31 August 2024 and the retention of two scooter pods.

Location- Bottisham Primary School, Beechwood Avenue, Bottisham, CB25 9BE.

Decision granted 12/04/21.

For further information please contact Jack Millar 01223 703851.

4. CCC/20/092/FUL- Erection of four solar car ports and ancillary equipment in the rear car park of the Cambridgeshire County Council Civic Hub, soft landscaping proposals, external lighting, and all associated works.

Location- Cambridgeshire County Council Civic Hub, Ermine Street, Alconbury Weald, PE28 4WX.

Decision granted 19/04/21.

For further information please contact Dallas Owen 01223 714722.

5. CCC/21/011/VAR- Retention of 7-bay mobile classroom for temporary period.

Informative: - Section 73 application to develop land without complying with condition 2 of planning permission E/3001/14/CC to extend the temporary period until 31 August 2024.

Location- Sutton Primary School, The Brook, Sutton, Ely, CB6 2PU.

Decision granted 28/04/21.

For further information please contact Kate Bannigan 01223 715491.

6. CCC/21/039/FUL- External alterations to the south elevation to install 5 new ground floor windows; and the installation of a new air conditioning condenser unit with concrete plinth.

Location- Unit 7, Oak Court, Willow Road, The Lakes Business Park, Fenstanton, Huntingdon, PE28 9RB.

Decision granted 04/06/21.

For further information please contact Kate Bannigan 01223 715491.

7. CCC/21/021/VAR- Completion of construction of two agricultural irrigation reservoirs following the extraction of sand and gravel.

Informative: -This is a Section 73A planning application to continue development previously authorised by planning permission F/02008/18/CM for the completion of construction of two agricultural irrigation reservoirs without compliance with condition 3 Time limit for restoration, to allow the completion of final restoration and landscaping by 30 September 2021.

Location- Lyons Farm Reservoirs, Wimblington Road, Manea, PE15 0JZ.

Decision granted 09/06/21.

For further information please contact Luke Walstow 01223 703861.

8. CCC/20/070/FUL- Change of use of land to create an extension to the existing waste transfer and treatment station; the provision of hard surfaced areas for ancillary storage and processing; a 5.2 metre high metal container wall and landscaping proposals including a 3 metre high bund; and 300 mm high retaining wall.

Location- Lodge Farm, Knights End Road, March, PE15 0YN.

Decision granted 14/06/21.

For further information please contact Kirsty Carmichael 01223 703216.

9. CCC/21/001/VAR- Section 73A application to continue development without compliance with Condition 10: Pedestrian Crossing of planning permission S/0095/18/CC for development of Waterbeach Community Primary School from a 2 form entry school to a 3 form entry (630 places) including a two storey teaching block extension with a single storey link, front entrance, additional car and cycle/scooter parking provision and external landscaping works.

Location- Waterbeach Community Primary School, High Street, Waterbeach, CB25 9JU.

Decision granted 18/06/21.

For further information please contact Jane Stanley 01223 743812.

10. CCC/21/032/VAR- Retention of 7 bay 21m x 8.7m approx. mobile classroom building on existing Primary School site for a temporary period.

Informative: - Section 73 application to develop land without complying with condition 3 of planning permission F/2007/16/CC to extend the temporary period until 31 August 2024.

Location- Benwick Primary School, High Street, Benwick, PE15 0XA.

Decision granted 25/06/21.

For further information please contact Kate Bannigan 01223 715491.