

APPENDIX 2.2

SCOPING OPINION

**TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
(ENGLAND AND WALES) REGULATIONS 2017**

SCOPING OPINION

THE BEEHIVE CENTRE, COLDHAMS LANE, CAMBRIDGE

**PROPOSED DEMOLITION AND REDEVELOPMENT OF THE BEEHIVE CENTRE,
IN OUTLINE APPLICATION FORM, FOR A NEW LOCAL CENTRE, OPEN SPACE
AND EMPLOYMENT (OFFICE AND LABORATORY) FLOORSPACE TO THE
GROUND FLOOR AND TO THE UPPER FLOORS; ALONG WITH SUPPORTING
INFRASTRUCTURE, INCLUDING PEDESTRIAN AND CYCLE ROUTES,
VEHICULAR ACCESS, CAR AND CYCLE PARKING, SERVICING AREAS,
LANDSCAPING AND UTILITIES.**

SCOPING RESPONSE ON BEHALF OF CAMBRIDGE CITY COUNCIL



**GREATER CAMBRIDGE
SHARED PLANNING**

CAMBRIDGE CITY COUNCIL

PLANNING REFERENCE 22/05250/SCOP

3 February 2023

1. Introduction

Environmental Impact Assessment (EIA) is an iterative process that attempts to ensure that any significant effects on a range of environmental issues that might result from a particular development are fully understood and taken into account prior to any planning decision being taken.

‘Scoping’ forms part of the overall EIA process and attempts to identify all of the possible environmental impacts that a development project might cause, and then to subsequently determine which of those impacts are likely to be significant and which therefore require detailed investigation in the EIA.

The effects of the proposal on a range of environmental topics should be assessed in terms of their characteristic (adverse, beneficial, neutral, direct, indirect, cumulative), scale (international, national, regional, direct, local) and significance (long term, short term, irreversible, reversible, major, minor) together with their timing (pre-construction, construction, operation/occupation, decommissioning, restoration). Where the potential for significant environmental effects have been identified as part of a scoping exercise, the Environmental Statement (ES) comprising part of the EIA process should propose mitigation and monitoring measures.

The Town and Country Planning (Environmental Impact Assessment (England and Wales) Regulations 2017 (‘the 2017 Regulations’) form the basis for the scoping procedures, by allowing a ‘person minded to make an EIA application’ to ask the relevant planning authority to state in writing their opinion as to the scope and level of detail of the information to be provided in the Environmental Statement (ES), in the form of a Scoping Opinion.

2. Request for a scoping opinion 22/05250/SCOP

This Scoping Opinion is based on information provided to Cambridge City Council (‘the Council’) in the form of an EIA Scoping Report dated November 2022 (‘the Scoping Report’), prepared by Bidwells on behalf of Railway Pensions Nominees Ltd (‘the Applicant’), and covering letter dated 2nd

December 2022 ('the Covering Letter'), together with the comments and opinions resulting from consultation with other bodies.

The scoping exercise was initiated following the receipt of the above documents and constituting a formal request for a scoping opinion to the Council. This Scoping Opinion has been prepared and issued by the Council in response to the request as part of the EIA process.

In accordance with the 2017 Regulations, this Scoping Opinion shall not preclude the Council from subsequently requiring the developer to submit further information in connection with any application subsequently submitted to the Council.

3. Consultation

During the scoping process, formal consultation was undertaken with the relevant statutory agencies/authorities, and other relevant parties seen to have an interest in the proposal and/or having expertise in the environmental issues relevant to this site.

In addition to the consultation responses received, two representations were also received from a local resident and non-statutory organisation who raised concerns citing the following points:

- inappropriate application of Design Manual for Roads and Bridges for a local commercial estate;
- inadequate mention of cyclists as a key mode of transport including direct cycle and walking routes through the site;
- need for proper analysis of the impact of the new roundabout and access design;
- ensuring visual and amenity effects of buildings are captured;
- lack of section and heights of buildings provided as part of the Scoping Report;
- attractiveness and practicalities of walking routes from the station; and

-lack of reference to exemplar standards for sustainability, energy and water efficiency and production of renewable energy.

A list of the parties consulted and representations received can be viewed online through the Council's planning application system, quoting the reference 22/05250/SCOP:-

<https://www.greatercambridgeplanning.org/planning-applications/view-and-comment-on-planning-applications/>

4. Comments on Scoping Report

The Scoping Report comprises a request for a Scoping Opinion under Regulation 15 of the 2017 Regulations. The request includes the information required under Regulation 15 (2), in addition to additional information which sets out the proposed approach to the EIA and technical assessments; the consultation that will be undertaken as part of the EIA, and the intended structure of the ES.

It is an expectation that in submitting the ES, all necessary information is provided as identified in Part 4 of the 2017 Regulations.

SECTION 1 - INTRODUCTION

The purpose of the Scoping Report and the obligations of the Council as Competent Authority including the relevance of overarching EIA Regulations and process is noted.

SECTION 2 - SITE CONTEXT

The site location, approximate size and description of existing land uses on the site is noted.

The description of key features of the local environment including heritage, flood risks and drainage, geology and soils, air quality and environmental designations and ecology is noted.

SECTION 3 – PROPOSED DEVELOPMENT

The description of the nature and purpose of the proposed development and intended application type is noted. Reference to a 'community pavilion building' as shown on the appended parameter plans should be included in the description.

The use of parameter plans is noted as is the expectation that the EIA will be formulated with respect to each of the elements. The parameters to be covered and the details they prescribe are also noted.

SECTION 4 – EIA METHODOLOGY AND SCOPE

It is noted that the Applicant considers the proposals exceed the applicable screening thresholds at Schedule 2, 10(b) of the EIA Regulations, 1 hectare of urban development which is not dwellinghouse development. The Council therefore, acknowledges the applicant's position of voluntarily preparing an ES.

The submitted Scoping Report is considered to satisfy the Scoping Opinion information requirements set out in Part 4, Paragraph 15 (2) of the 2017 Regulations.

Methodology

Overall the Council supports the methodological approach to be based on the 2017 Regulations and with reference to best practice including that published by the Institute of Environmental Management and Assessment (IEMA). Specific comments regarding the scope and methodology for each topic are made below.

Topics to be 'Scoped In'

Air Quality (C5, pgs. 18-22)

The Council supports that the ES will assess likely significant effects of the proposed development during construction and the operational phases of development.

The Scoping Report correctly acknowledges that the site is located within an Air Quality Management Area (AQMA).

The Council has noted that the Applicant is seeking to scope out the effects of vehicle related emissions. Whilst this may be reasonable given the proposed development would seek to reduce onsite car parking, it is requested that the Applicant Team confirms vehicle trip generation figures at the earliest possible stage so that this conclusion can be supported.

In addition to the proposed approach and method, the Applicant Team is requested to consider the (additional) following supporting planning and supplementary advice when undertaking the assessment:

- Planning Policy 36 of the Cambridge City Local Plan – requires that that any new development should not have an adverse effect on air quality within the AQMA;
- The Cambridge City Air Quality Action Plan and the Greater Cambridge Sustainable Design and Construction SPD (2020); and
- Emerging national policy relating to PM_{2.5} and the new limit value of 10µg/m³.

The Council notes that information relating to the proposed energy strategy will be scoped into the ES. Therefore, in addition to the consideration of combustion emissions for the provision of heating and hot water, the ES should consider emissions from all back-up generators (if applicable) and demonstrate how the proposed development will not have a negative impact

on the air quality within the AQMA and the health and amenity of local residents. Should back-up generators be relied upon, the ES should also demonstrate that this reliance will not lead to hourly exceedances of both nitrogen dioxide and particulate matter (PM₁₀).

The detailed methodology for the AQA should be agreed with the Council prior to the modelling being undertaken.

The Council notes that dust related effects during the construction and demolition phases of development will be assessed in accordance with Institute of Air Quality Management (IAQM) guidance. Further requirements for a dust management plan and the associated technical guidance for its preparation and action is covered in the Environmental Health response dated 13/01/2023.

Flood Risk and Drainage (C6, pgs. 23-25)

The Scoping Report has determined that the site is subject to low risk of flooding from main rivers (including tributaries), sea and other ordinary watercourses. It is also noted that the site is also at low risk of flooding from groundwater, sewers, failure of pumping installations, or breach of raised reservoir embankments.

Notwithstanding the above, the Council agrees that the Scoping Report will assess the likely significant effects during construction and operational phases in relation to matters including water quality, groundwater, surface water, foul water as well as onsite and offsite effects.

The Applicant Team should note that the Lead Local Flood Authority (LLFA) will expect a full Flood Risk Assessment and Surface Water Drainage Strategy at the planning application stage. Please also note their advice given in its response dated 9 January 2023.

In addition to the approach and methodology, the Applicant Team are also advised to consider the requirements for developing a surface water drainage scheme for the proposed development - see Surface Water Planning Guidance (June 2021)- [Developers - Cambridgeshire County Council](#).

Heritage (C7, pgs 26-29)

The Council supports the inclusion of an assessment of likely significant effects on above ground-built heritage, and specifically designated heritage assets including Listed Buildings and Conservation Areas within the vicinity of the proposed development as well as locally designated and non-designated assets identified in the adopted Local Plan.

The Council notes that the approach and methodology for assessment will be carried out in accordance with advice in the NPPF. In addition to this, the Applicant Team should consider good practice guidance Planning Note 3: *The Setting of Heritage Assets*. The team should also note the comments of Historic England which requests specifically that the assessment provides qualitative (non-technical) narrative of the respective harm and/or loss and not just rely on the standard EIA matrix explanatory approach. All supporting technical heritage information should be included as appendices to the ES.

In addition to sensitive heritage assets identified in Table 7.4, the Council requests that the following **additional** receptors are also included in the assessment:

- **Chapel of St Mary Magdalene, Stourbridge Chapel (The Leper Chapel) –grade I listed;**
- **Cambridge Gas Company War Memorial, Newmarket Road –grade II listed; and**
- **Custodian’s House, Mill Road Cemetery –grade II listed.**

In addition, the following receptors noted in Table 7.4 should also be *italicised*:

- ***Central Conservation Area***
- ***All Saints Church***
- ***Kings College Chapel***
- ***Jesus College***
- ***Mill Road Cemetery***

The Church of Our Lady and the English Martyrs should in fact be indicated as 'grade I' and not 'grade II*.'

Ground Conditions and Contamination (C8, pgs. 30-34)

The Scoping Report identifies contaminated land as a significant environmental aspect which has been scoped into the ES. The Council accepts and agrees that the issue of contaminated land will require full consideration in the ES.

The Council notes the baseline conditions for contamination including potential impacts. The Council also welcomes that a Preliminary Risk Assessment (PRA) has already been undertaken and is intended to be appended to the ES as is your commitment to engage with its Environmental Health and Building Control Departments for further contaminated land information prior to its preparation. In addition to your stated approach/method, it is also recommended that the PRA includes a site investigation strategy at the outline planning stage submission.

The Council confirms your assumptions that relevant planning conditions may be imposed to mitigate the effects arising from the proposed development and these could likely include a Construction Environmental Management Plan (CEMP) and requirements for ground investigation and remediation in accordance with Land Contamination Risk Management (LCRM) guidance.

Townscape and Visual (C9, pgs 35-36 and Appendix 2)

The inclusion of an assessment of the likely significant townscape and visual impacts via a Townscape and Visual Impact Assessment (TVIA) within the ES is supported.

The Council notes the applicant's TVIA baseline viewpoints (as indicated at Appendix 2 of the Scoping Report) although you are requested to confirm the full scope before commencing the assessment. The Council also notes that further iterations and additions to the initial viewpoints could occur until the design is fixed (refer to paragraph 1.2 of Scoping Report).

It is also requested that all baseline contextual images being used to represent the proposed development are up-to-date and accurate at the time of the ES submission. This is not currently the case with some of the images currently being used in discussions. You should also consider providing night-time views including seasonally appropriate and verified viewpoints (during spring, summer and winter) to enable a comprehensive appreciation of the proposed development.

Noise and Vibration (C10, pgs. 37-42)

The Council agrees that noise and vibration should be scoped into the ES.

The assessment identifies the likely effects to be from construction and demolition activities (construction phase); and new building services plant and newly formed events and public spaces (operational/complete phase).

The Council supports the existing baseline conditions and measurements that have been identified in the Scoping Report including confirmation that further short-term measurements will be undertaken to verify the suitability of the data gathered thus far.

The justifications for scoping out of changes in road traffic flows and environmental vibration effects for operational/complete phases should be

confirmed in view of our previous comments relating to anticipated traffic flows prior to assessment.

Notwithstanding the above, a Noise Impact Assessment and Construction Environmental Management Plan (CEMP) are both expected to be prepared to accompany the planning application. It is recommended the Applicant agree the scope and methodology of these with the Council prior to the assessment. The relevant assessments mentioned should follow the requirements of the Cambridge Sustainable Design and Construction SPD (2020) <https://www.cambridge.gov.uk/greater-cambridge-sustainable-design-and-construction-spd>.

Socioeconomics (C11, pgs. 43-48)

The Council supports the scoping in of likely significant effects on social and economic conditions of the proposed development within the ES. This is a key element of the assessment and therefore must commit to providing an unambiguous and comprehensive analysis using all available information, in addition to that already indicated. The following points should be scoped in

Retail

The Beehive is a significant destination for comparison and convenience based shopping. It accounts for 4%¹ of the total comparison goods share/spend in the Cambridge region as a whole. There is also potential for significant in combination effects, as there are development proposals for the Grafton Centre² which also represents 4% of the total spend in the Cambridge region. The EIA should consider the impact on retail provision locally, in Cambridge, and in the subregion as a whole.

The EIA should consider the potential impacts of displacement of the retail uses to potentially less accessible peripheral locations, including related environmental impacts. Displacement/restructuring could also impact on the

¹ <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-11/GCLPEBJobsRetailandLeisureBaselineFindingsAug21.pdf>, see Table 4.1, pdf page 38

² <https://www.graftoncentreconsultation.co.uk/>

character of Cambridge as a compact, destination city for leisure and tourism in future.

The potential loss of affordable low-cost retail could have significant social and economic impacts on those that rely on the services for affordable shopping and employment. The Scoping Report is not explicit whether these effects will form part of the scope and therefore request that this is included as part of the potential impacts of the proposed development.

Leisure

Impacts on leisure and service provision should also be considered including the impacts on local leisure facilities, a number of which are currently operating at capacity³. The loss of the current onsite leisure facility should also be included in this analysis.

The councils are currently updating their sports studies to support the emerging Joint Local Plan. However, in the Councils' Indoor Sports Facility Strategy (ISFS)⁴ 2015-2031, updated June 2016 already indicated Parkside Swimming Pool, the nearest swimming pool to the Beehive Centre, is ageing and in need of investment (ISFS para 1.22, pdf page 16) and is already at 98% capacity (ISFS para 5.155, pdf page 135). Since the report, no new swimming pool provision has been provided in Greater Cambridge. This means the presence of an additional 5000 new employees could place additional pressure on local facilities which are themselves already at capacity.

³ Indoor Sports Facility Strategy (ISFS): <https://files.cambridge.gov.uk/public/ldf/coredocs/RD-CSF/rd-csf-200.pdf>

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Employment and housing needs & affordability

The proposed increase in research and development and life science employment has the potential to cause significant effects in terms of housing need and on existing and future housing affordability in the Cambridge City area. Such impacts have been demonstrated by evidence commissioned to support the local plan review: Greater Cambridge Employment Land and Economic Development Evidence Study 2020⁵, the Housing and Employment Relationships Report 2020⁶, and the Greater Cambridge Employment and Housing Evidence Update 2023⁷. Accordingly, the Applicant Team should scope this impact in as a possible significant/key effect of the proposed development.

Transport (C12, pgs. 49-53)

The Council supports that the ES will assess the likely significant effects of the operational and construction phases on the existing road network within its vicinity.

The Council acknowledges that a full Transport Assessment (TA) is going to be prepared to accompany the planning application. The Council also notes that early scoping discussions concerning the transport implications of the development have already taken place between the Applicant Team and County Council Highways and is expected to continue as the matter progresses through the planning process. Notwithstanding, the Applicant Team should also ensure that the source of transport data being used is consistent in both the ES and TA.

A Construction Traffic Management Plan (CTMP) has been suggested by National Highways to be submitted at the planning application stage to ensure that the effects on the Strategic Road Network (A14) can be properly

⁵ [Greater Cambridge Employment Land and Economic Development Evidence Study \(greatercambridgeplanning.org\)](https://greatercambridgeplanning.org)

⁶ [Greater Cambridge Local Plan strategic spatial options assessment Housing and Employment Relationships Nov2020 \(greatercambridgeplanning.org\)](https://greatercambridgeplanning.org)

⁷ [Greater Cambridge Employment and Housing Evidence Update \(greatercambridgeplanning.org\)](https://greatercambridgeplanning.org)

understood and mitigated. Whilst a CTMP would be secured by planning condition, the Applicant Team is recommended to provide this at the outset of the planning submission.

Cumulative Impacts (C13, pgs. 54-59)

There is currently no agreed industry standard for undertaking Cumulative Effects Assessment (CEA).

The criteria to be used in the scoping of development projects at paragraphs 13.4 and 13.5 is acceptable as are the specific projects to be scoped into this CEA.

Proposed Structure of the ES (C14, pgs. 60-62)

This is noted to be in accordance with the EIA Regulations. Please ensure that relevant Chapter Headings indicated are consistent with EIA standard descriptions and terminology.

SECTION 5: NEW MATTERS CAPABLE OF BEING SCOPED INTO THE EIA

In accordance with the 2017 EIA Regulations, the Council considers that the scope of the EIA must include consideration of the following environmental topics:

- **Water Resources**

Water Resources – Need for Secure and Sustainable Water Supplies

The interaction of development planning and water resource management is a key issue for the Anglian region. Evidence in the emerging Integrated Water Management Study (which is informing the preparation of the emerging Greater Cambridge Local Plan) indicates that groundwater abstraction to meet current needs is already causing (or at risk of causing) ecological damage to

Water Framework Directive (WFD) designated waterbodies (including chalk streams).

The location of this development is in an area of serious water stress as identified in the Environment Agency report 'Water stressed areas – final classification' - [Water stressed areas – 2021 classification - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/441111/water_stressed_areas_2021_classification.pdf).

Given the scale, amount and type of uses being proposed in this development, there is significant potential that the abstraction from groundwater resources would increase. Accordingly, the Council strongly requests that the Applicant Team considers the 'alone' and 'in-combination' effects with other proposed major developments in the Greater Cambridge Area (South Cambs and City) to demonstrate that the water can and will be supplied sustainably without adverse impact on the WFD waterbodies and chalk streams. Those sites to be scoped into the cumulative impact assessment should be agreed with the Council and should include allocated growth sites and major development sites with extant planning permission as measured against existing demand / supply. The latest Cambridge Water Resource Management Plan should be referenced as part of the evidential base for such an assessment which is due to be updated shortly.

The Applicant Team should note that the Environment Agency are currently unable to advise confidently that the proposed development will not harm the water environment until it has been demonstrated that sustainable supplies can be provided.

Water Resources – Availability of Existing Developed Water Resources

At the time of writing this Scoping Opinion, advice from Cambridge Water and Anglian Water had not been received. Notwithstanding, the following matters should be considered as part of a baseline assessment.

The timing and cost of infrastructure improvements will be a consideration. This issue should be discussed with the water company.

It is the responsibility of the Applicant to ensure that no local water features (including streams, ponds, lakes ditches or drains) are detrimentally affected. This includes both licensed and unlicensed abstractions.

If the proposal requires an abstraction licence, it is recommended that the Applicant contact the local Environment Agency office. Depending on water resource availability, a licence may not be granted.

SECTION 6: MATTERS CAPABLE OF BEING SCOPED OUT OF THE EIA

With respect to other matters identified to be scoped out of the ES, the Council agrees in general to this approach subject to the relevant advice/comments:

- Microclimate
- Climate Change
- Health and Wellbeing
- Tourism
- Social Infrastructure
- Retail
- Ecology
- Arboriculture
- Archaeology
- Utilities
- Waste
- Major Accidents and Disasters
- Secondary Effects

Microclimate

It is not anticipated that 'Odour' would have a significant effect and can be addressed via implementation of a waste strategy at the operational stage of development. This is acceptable.

Whilst the development is not expected to significantly increase light pollution effects, a Lighting Impact Assessment is required at the planning application stage and must follow the guidance for preparation as set out in Environmental Health Department's response.

The scale, massing, height and proximity of the proposals to neighbouring residential dwellings has the potential to reduce daylight and sunlight as well as cause overshadowing and solar glare. Whilst the development design to date has sought to maintain and manage these impacts, the Council would expect a daylight, sunlight and overshadowing study in accordance with the recent update to the '*BRE Site Layout Planning for daylight and Sunlight – a guide to good practice*' to be submitted with the planning application.

Similarly, consideration of wind microclimate effects and the comfort of both pedestrians, cyclists and visitors in/around event spaces/public realm should be considered in a separate wind impact assessment to accompany the planning application.

Climate Change

It is noted that the issue of greenhouse gases and climate change has been scoped out of the ES. The Council considers this approach to be acceptable.

In line with policies contained within Section 4 of the Cambridge Local Plan 2018, the development will need to comply with the requirements of policies relating to climate change mitigation and adaptation, with the planning application supported by a Sustainability Statement and Energy Strategy. Further detail on what should be included within these documents is provided in the Greater Cambridge Sustainability Design and Construction SPD (see previous link provided above).

Health and Wellbeing

The Council is content that the health and wellbeing effects of development has been scoped out of the ES and acknowledges that a separate Health Impact Assessment (HIA) will be prepared to accompany the planning application and appended to the Technical Appendix of the ES.

It is an expectation that the application submission will set out how the development will provide healthy, inclusive and safe places, in accordance with Chapter 8 of the NPPF (2021).

Tourism

The Council is satisfied that tourism effects can be scoped out of the ES.

Social Infrastructure

As there are no residential dwellings proposed as part of the development, there will not be an increased demand for social infrastructure such as schools, health services, affordable housing or active recreation space such as playing fields. It is accepted that the overall social infrastructure demands are unlikely to be significant and can therefore, be scoped out of the ES.

Retail

Submission of a Retail Impact Assessment to accompany the planning application is acceptable. However, the additional comments made in respect to the potential scope of socioeconomic effects of development must be considered more comprehensively and thoroughly (see pages 11-13).

Ecology

Whilst the Council can be satisfied that the proposed development would not have a significant 'local' impact on habitats, species or designated sites, the Applicant Team should ensure that interrelated effects from potential increases in water abstraction have been robustly considered.

An up-to-date ecological survey, in accordance with the Greater Cambridge Biodiversity SPD (February 2022) - [Greater Cambridge Biodiversity Supplementary Planning Document \(greatercambridgeplanning.org\)](https://www.greatercambridgeplanning.org) should be submitted as part of the planning application alongside a Biodiversity Net Gain Plan.

Arboriculture

The Council is satisfied that the proposed development would seek to protect and enhance tree assets within the site and therefore no significant effects are anticipated. Notwithstanding, a full Arboricultural Impact Assessment and Arboricultural Method Statement are required to be prepared in accordance with relevant best practice and submitted with the planning application.

Archaeology

The Scoping Report confirms that there is low potential for archaeological remains to survive within this developed site. Notwithstanding, it advises an Archaeological Assessment will be undertaken and submitted with the planning application. The Council agrees with this approach.

Utilities

The Council notes that relevant technical reports could address the provision of utilities. However, the Applicant Team should note and address the potential significant effects on existing and future water resources given the concerns expressed at the beginning of Section 5 of this Opinion (see pages 14-16).

Waste

The Council is content that this issue can be scoped out of the ES. In accordance with County policies, the planning application should demonstrate for construction and operational phases of the development how waste will be minimised and managed in a sustainable way, in accordance with the Waste Hierarchy. All major developments are required to have a

temporary waste recycling facility to maximise the re-use, recycling and recovery of inert and construction waste streams throughout the construction phases of the development.

It is noted that a Site Waste Management Plan and Construction Environmental Management Plan will support the planning application, which is welcomed.

Major Accidents and Disasters

The Council accept that significant effects from major accidents and disasters is low given the site location and nature of development proposed. Therefore this can be scoped out of the ES.

Secondary Effects

The Council is content that this issue can be scoped out of the ES.

END