

Statement of ES Conformity

Introduction

Bidwells LLP submitted a hybrid planning application in June 2022, on behalf of Brookgate Land Ltd, for a mixed-use development of brownfield land at Milton Avenue, Cambridge North. The application was accompanied by an Environmental Statement (ES) prepared in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

In response to consultee and neighbour comments on the application, a suite of new and amended plans and documents is being submitted. This resubmission comprises the following:

1. Response to Statutory Consultees
 - 1.1 Highways Technical Note;
 - 1.2 Flood Risk Assessment Addendum and Water Resources Addendum;
 - 1.3 Updated Biodiversity Net Gain (BNG) Assessment and Ecology Survey Report Update;
 - 1.4 Landscape and Open Space Updates Report;
 - 1.5 Statement in response to the comments of the Minerals and Waste Authority (MWA);
 - 1.6 Updated Low Emission Strategy;
 - 1.7 Energy Strategy Addendum;
 - 1.8 Addendum to Sustainability Strategy;
 - 1.9 Response to Comments from Waste Services and Updated Preliminary Operational Waste Management Plan (P-OWMP);
 - 1.10 Response to Cambridge Past, Present and Future.
 - 1.11 Response to Urban Design Officer

2. Formal Amendments
 - 2.1 An amended schedule of updated or new drawings for approval, and illustrative drawings (not for approval).

Implications for Predicted Effects and Proposed Mitigation

This new/amended information has been reviewed by the EIA team to confirm whether it has any implications for the assumptions on which the assessment was based, or for the predicted effects and proposed mitigation as reported in the ES. The conclusions are set out below for each of the submitted deliverables.

1.1 Highways Technical Note

Transport

The changes in traffic flows resulting from the proposed car parking strategy have been considered against the methodology applied within the ES Transport chapter. The increase in vehicle movements associated with the additional car parking spaces are not considered to alter the predicted effects and therefore the proposed mitigation and conclusions of the Transport ES Chapter remain unchanged.

Air Quality

The Technical Note confirms that the uplift in parking traffic would give rise to more development traffic routing towards the city centre and less using the A14 junction north of the Site. This will result in some potential for increased air quality impacts at existing receptors, although this increase will be very small. The biggest differences relate to Cowley Road and the A14 west of the A1309 (westbound), which show a 693 increase and 858 decrease, respectively, in AADT numbers. These changes are insufficient to affect the conclusions of the air quality assessment as reported in the original ES.

Climate Change

The updated traffic modelling has identified an increase in generated trips to and from the proposed development. As a result, operational traffic carbon emissions would increase by 46%, and overall (construction and operational) design life carbon emission by 31%. Whilst this amounts to a material change to the carbon results, significance is determined from a combination of contextualising the project's emissions, the level of mitigation, alignment with relevant guidance and trajectory to net zero. The specialist advises that this increase in transport carbon emissions would be insufficient to alter the level of significance of the predicted effects.

Noise and Vibration

The Technical Note considers the implications of the vehicle trips associated with the additional car parking spaces proposed for commercial use within

the mobility hub. The noise assessment predicts a minor change in level from 3 dB to 3.8 dB on Cowley Rd, and a 0.1 dB change on some other road links. Changes of this magnitude are immaterial in assessment terms, and the effects as reported in the original ES are considered to remain valid.

1.2 FRA Addendum and Water Resources Addendum

It is confirmed that neither the FRA Addendum nor the Water Resources Addendum affects the conformity of the ES Drainage and Flood Risk Chapter or the Water Resources and Neutrality Addendum previously submitted

This is because the specific climate change allowances (percentages added to peak rainfall intensities) that were subject to UK Government Guidance updates dated 10th and 27th May 2022, and the specific surface water attenuation volumes (in m³) that derive from these allowances, are not referred to in the ES. Whilst the climate change percentages and attenuation volumes have been revised, as stated within the FRA Addendum, they do not affect the significance of the effects as originally reported.

1.3 Updated BNG Assessment and Ecology Survey Report Update

The updated BNG assessment confirms the positive impact the development would have on the biodiversity of the site, and is consistent with the conclusions of the ecological assessment as reported in the original ES.

The Ecology Survey Report Update confirms that the survey results are in line with the baseline assessment within the ES Chapter. Therefore this additional information has no implications for the predicted effects or proposed mitigation as reported in the ES.

1.4 Landscape and Open Spaces Updates Report

This update has no material implications for the assessment of either townscape and visual effects, or effects relating to demand for public open space, as reported in the ES.

1.5 Statement in Response to MWA

Supplementary assessment work has confirmed that:

- the additional and amended information has no implications for the predicted effects and proposed mitigation reported in the ES, the findings of which remain valid;

- the closest this information comes to giving rise to a material change relates to the carbon emissions from the additional traffic flows, but this is not considered to alter the level of significance; and
- the environmental impacts of the waste transfer station, aggregates railhead and Tarmac plant are insufficient to give rise to complaints from residents of the proposed development, and are therefore unlikely to compromise the operation of these safeguarded facilities.

1.6 Updated Low Emission Strategy (LES)

Air Quality

The LES explains how the impact of transport-related emissions from the development would be mitigated by promoting low-emission modes. It is consistent with the conclusions of the air quality assessment as reported in the original ES.

Climate Change

The LES was produced in response to the Greater Cambridge Sustainable Design and Construction Supplementary Planning Document (SPD). It presents a series of measures to reduce transport carbon emissions through, for example:

- providing EV charging points to encourage the update of electric vehicles;
- using Travel Plans to facilitate modal shift to more active modes;
- limiting parking provision for non-electric vehicles; and
- incentivising the use of public transport through the provision of extended bus stop facilities and a shuttle-bus service.

The LES does not alter the development's carbon footprint or the conclusions of the carbon assessment, because the LES does not provide any specific data to enable the assessment to be updated. The mitigation measures identified in the LES align with the sustainable transport measures set out within the Sustainability Strategy and presented in the Climate Change chapter.

1.7 Energy Strategy Addendum (ESA)

Air Quality

The ESA relates to overheating, the mobility hub and the aspiration for the development to be operational net zero. It has no implications for the conclusions of the air quality assessment, which therefore remain valid.

Climate Change

The updated Energy Strategy states that the development “*will be targeting a baseline operational energy target...in line with LETI....committing to 60 kWh/m²/year with aspirations to 55 kWh/m²/year.*” LETI is a network of over 1,000 built-environment professionals working to put the UK on a net zero pathway. If LETI’s 60kWh.m².yr target is met on the development’s gross internal area (37,135m²), the overall carbon footprint would be reduced by 0.5%, whilst operational emissions would be cut by 20%. It is important to note that operational emissions represent only 3% of overall emissions. This new energy efficiency target is unlikely to make a material change to the overall carbon assessment (construction + operational emissions) or to alter the conclusions in the ES.

The updated Energy Strategy also refers to overheating and the mobility hub. In response to overheating concerns, the Strategy commits to meeting CIBSE TM59, the latest guidance on how to address overheating risks in homes. This does not alter the reported carbon emissions in the ES and complies with the scheme’s design guide inputs appended to the ES climate change chapter (Appendix 7F) which requires a thermal analysis to demonstrate its resilience to climate change, including heating. The Strategy states that an initial energy analysis of the Mobility Hub has been undertaken, and that it will be all electric and efficient in design. This does not alter the results of the carbon assessment or the conclusions in the Climate Change chapter.

1.8 Addendum to Sustainability Strategy

This has no implications for the findings of the ES.

1.9 Response to Comments from Waste Services/Updated P-OWMP)

This response has no implications for the findings of the ES.

1.10 Response to Cambridge Past, Present and Future

This response has no implications for the findings of the ES.

1.11 Response to Urban Design Officer

This response has no implications for the findings of the ES.

2.1 Updated Schedule of Plans for Approval/Illustrative Plans

These new/updated plans have no implications for the findings of the ES.