

Cambridge Waste Water Treatment Plant Relocation Project
Anglian Water Services Limited

Section 55 Checklist

Application Document Reference: 1.7
PINS Project Reference: WW010003
APFP Regulation No. 5(1)

Revision No. 01
April 2023

13Section 55(2) Acceptance of Applications			
1	Within 28 days (starting day after receipt) the Planning Inspectorate must decide whether or not to accept the application for Examination.	Date received	28 day due date Date of decision
Section 55(3) – the Planning Inspectorate may only accept an application if it concludes that:			
Section 55(3)(a) and s55(3)(c): It is an application for an order granting development consent			
2	Is the development a Nationally Significant Infrastructure Project (NSIP) (or does it form part of an NSIP); and does the application state on the face of it that it is an application for a Development Consent Order (DCO) under the Planning Act 2008 (the PA2008), or equivalent words? Does the application specify the development to which it relates (ie which category or categories in ss14 to 30 does the Proposed Development fall)? If the development does not fall within the categories in ss14 to 30, has a direction been given by the Secretary of State under s35 of the PA2008 for the development to be treated as development for which development consent is required?	Yes.	The Secretary of State for Environment Food and Rural Affairs issued a Direction pursuant to Section 35 of the Planning Act 2008 on 18 January 2021 confirming that the Proposed Development is to be treated as development for which development consent is required. This is explained in the Application Form (Application Document Reference 1.2) and the Planning Statement (Application Document Reference 7.5) .
3	Summary: Section 55(3)(a) and s55(3)(c)		

Section 55(3)(e): The Applicant in relation to the application made has complied with Chapter 2 of Part 5 (pre-application procedure)

4	In accordance with the EIA Regulations, did the Applicant (prior to carrying out consultation in accordance with s42) either (a) request the Planning Inspectorate adopt a Screening Opinion in respect of the development to which the application relates, or (b) notify the Planning Inspectorate in writing that it proposed to provide an Environmental Statement in respect of that development?	<p>(a) No, the Applicant did not request a Screening Opinion.</p> <p>(b) Yes. The Applicant notified the Planning Inspectorate in writing pursuant to Regulation 8(1)(b) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 that it proposed to provide an Environmental Statement in respect of the development on 21 September 2021. A copy of this notice is contained at Appendix 33 of the Consultation Report (Application Document Reference 6.1.33).</p>
5	Have any Adequacy of Consultation Representations been received from 'A', 'B', 'C' and 'D' local authorities; and if so do they confirm that the Applicant has complied with the duties under s42, s47 and s48?	-
Section 42: Duty to consult		
Did the Applicant consult the applicable persons set out in s42 of the PA2008 about the proposed application?		
6	Section 42(1)(a) persons prescribed?	<p>Yes.</p> <p>The Applicant consulted the relevant prescribed consultees; defined in Regulation 3 and Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended), also including those parties notified to the Applicant pursuant to 11(1)(c) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. See Appendix 5 of the Consultation Report (Consultees Consulted under S42 of Planning Act 2008) (Application Document Reference 6.1.5) which summarises who was consulted (and includes further non-statutory and non-prescribed parties).</p> <p>Further detail on the Applicant's consultation pursuant to section 42 PA 2008 is contained in section 7 (statutory consultation under section 42 of the 2008 Act) of the Consultation Report (Application Document Reference 6.1).</p>
7	Section 42(1)(aa) the Marine Management Organisation?	n/a
8	Section 42(1)(b) each local authority within s43?	Yes.

		<p>The Applicant consulted each local authority that is within s. 43. For the sake of clarity, these are listed below:</p> <p>'A' Neighbouring Authorities:</p> <ul style="list-style-type: none"> • East Cambridgeshire District Council • Huntingdonshire District Council • Uttlesford District Council • North Hertfordshire District Council • Braintree District Council • West Suffolk District Council <p>'B' Host Authorities:</p> <ul style="list-style-type: none"> • Cambridge City Council • South Cambridgeshire District Council <p>'C' Host Authorities:</p> <ul style="list-style-type: none"> • Cambridgeshire County Council <p>'D' Neighbouring Authorities:</p> <ul style="list-style-type: none"> • Bedford Borough Council • North Northamptonshire Council • Central Bedfordshire Council • Peterborough City Council • Norfolk County Council • Suffolk County Council • Essex County Council • Lincolnshire County Council • Hertfordshire County Council <p>See Appendix 5 of the Consultation Report (Consultees Consulted under S42 of Planning Act 2008) (Application Document Reference 6.1.5).</p> <p>Further detail on the Applicant's consultation pursuant to section 42 PA 2008 is contained in section 7 (statutory consultation under section 42 of the 2008 Act) of the Consultation Report (Application Document Reference 6.1).</p>
9	Section 42(1)(c) the Greater London Authority (if in Greater London area)?	n/a

10	Section 42(1)(d) each person in one or more of s44 categories?	<p>Yes.</p> <p>The Applicant consulted each person who is within one or more of the categories set out in Section 44. See Appendix 32 of the Consultation Report (Section 44 consultees) (Application Document Reference 6.1.32) and the Book of Reference (Application Document Reference 3.3).</p> <p>Further detail on the Applicant’s consultation pursuant to section 42 PA 2008 is contained in section 7 (statutory consultation under section 42 of the 2008 Act) of the Consultation Report (Application Document Reference 6.1).</p>
Section 45: Timetable for s42 consultation		
11	Did the Applicant notify s42 consultees of the deadline for receipt of consultation responses; and if so was the deadline notified by the Applicant 28 days or more starting with the day after receipt of the consultation documents?	<p>Yes.</p> <p>The Applicant notified all those consulted under Section 42 of the deadline in writing by email or post. See Appendices 26 and 27 of the Consultation Report (Notification to Section 42 Consultees of Section 42 Consultation and Notification to Section 44 Consultees of Section 42 Consultation (24 February 2022 – 27 April 2022)) (Application Document References 6.1.26 and 6.1.27). All Section 42 consultees were notified of the Section 42 consultation to commence on 24 February 2022 and close on 27 April 2022 (being more than the statutory minimum of 28 days).</p> <p>See also paragraph 7.8 (Targeted statutory consultation under section 42 of the 2008 Act) of the Consultation Report (Application Document Reference 6.1) and Appendix 30 of the Consultation Report (Application Document Reference 6.1.30).</p>
Section 46: Duty to notify the Planning Inspectorate of proposed application		
12	Did the Applicant supply information to notify the Planning Inspectorate of the proposed application; and if so was the information supplied to the Planning Inspectorate on or before the date it was sent to the s42 consultees? Was this done on or before commencing consultation under s42?	<p>Yes.</p> <p>The Applicant notified the Secretary of State in writing under Section 46 of the 2008 Act on 22 February 2022 before commencing consultation that it was intending to commence consultation under Section 42 of the 2008 Act on the PEIR commencing on 24 February 2022 and closing on 27 April 2022. Confirmation of receipt was provided by the Planning Inspectorate on 28 March 2022.</p> <p>Consultation documents included in this electronic package were:</p> <ul style="list-style-type: none"> • Section 46 cover letter (please see a copy in Appendix 4 of the Consultation Report (Application Document Reference 6.1.4)); • Example covering letter to statutory consultees under Section 42 of the 2008 Act (please see a copy in Appendix 26 of the Consultation Report (Application Document Reference 6.1.26)); • Example covering letter to land interests under Section 44 of the 2008 Act (please see a copy in Appendix 27 of the Consultation Report (Application Document Reference 6.1.27)); • Notice publicising the proposed DCO application under Section 48 of the 2008 Act (please see a copy in Appendix 23 of the Consultation Report (Application Document Reference 6.1.23)); • A link to the Applicant’s document library on its consultation project website containing: <ul style="list-style-type: none"> ○ The Preliminary Environmental Information Report (PEIR);

		<ul style="list-style-type: none"> ○ A non-technical summary of the PEIR; ○ The Draft Development Consent Order and Works Plans ○ Management Plans
Section 47: Duty to consult local community		
13	Did the Applicant prepare a Statement of Community Consultation (SoCC) on how it intended to consult people living in the vicinity of the land?	<p>Yes.</p> <p>The Applicant prepared a Statement of Community Consultation (SoCC). See Appendix 8 of the Consultation Report (Section 47 Duty to Consult Local Community – Statement of Community Consultation (Application Document Reference 6.1.8)).</p> <p>Further detail on the Applicant’s preparation, consultation and publication of its SoCC is contained in section 5 of the Consultation Report (Application Document Reference 6.1).</p>
14	Were ‘B’ and (where relevant) ‘C’ authorities consulted about the content of the SoCC; and if so was the deadline for receipt of responses 28 days beginning with the day after the day that ‘B’ and (where applicable) ‘C’ authorities received the consultation documents?	<p>Yes.</p> <p>Before publishing the statement, the Applicant consulted each local authority that is within Section 43(1) on the content of the SoCC, being:</p> <ul style="list-style-type: none"> ● Cambridge City Council (B) ● South Cambridgeshire District Council (B) ● Cambridgeshire County Council (C) <p>The Applicant also consulted the Cambridgeshire and Peterborough Combined Authority and East Cambridgeshire District Council (an ‘A’ authority) on the draft SoCC, and sought comments from the Planning Inspectorate.</p> <p>Appendix 7 of the Consultation Report (Section 47, Duty to Consult Local Community – Draft Statement of Community Consultation (Application Document Reference 6.1.7)) includes a copy of the consultation version of the draft SoCC.</p> <p>The Applicant submitted the draft SoCC to the local authorities for statutory consultation on 18 February 2021 at 15:38 by email accompanied by a cover letter (see Appendix 6 of the Consultation Report (Section 47, Duty to Consult Local Community – Statement of Community Consultation Cover Letter to Planning Authorities (Application Document Reference 6.1.6))).</p> <p>Responses were requested by 19 March 2021 (28 days in total), compliant with the statutory minimum of 28 days under Section 47(3) of the 2008 Act.</p> <p>Further detail on the Applicant’s preparation, consultation and publication of its SoCC is contained in section 5 of the Consultation Report (Application Document Reference 6.1).</p>

15	Has the Applicant had regard to any responses received when preparing the SoCC?	<p>Yes.</p> <p>The Applicant had regard to all relevant comments received on the draft SoCC. Details of the responses and how the Applicant had regard to them are provided in section 5 of the Consultation Report (Application Document Reference 6.1).</p>						
16	Has the SoCC been made available for inspection in a way that is reasonably convenient for people living in the vicinity of the land; and has a notice been published in a newspaper circulating in the vicinity of the land which states where and when the SoCC can be inspected?	<p>Yes.</p> <p>The Applicant made the SoCC available for inspection by the public on the CWWTPR project website (www.cwwtpr.com) from 09 June 2021 and were available in hard copy on request, as set out in Appendix 8 of the Consultation Report (Section 47 Duty to Consult Local Community – Final Statement of Community Consultation Application Document Reference 6.1.8)).</p> <p>The Applicant published the Section 47 notice in the local newspapers set out below. The notice explained where the SoCC could be viewed and inspected – a copy of the notice is contained in Appendix 10 of the Consultation Report (Section 47 Statement of Community Consultation Advertisements (Application Document Reference 6.1.10)).</p> <table border="1" data-bbox="595 603 1473 727"> <thead> <tr> <th data-bbox="595 603 1055 643">Publication</th> <th data-bbox="1055 603 1473 643">Date</th> </tr> </thead> <tbody> <tr> <td data-bbox="595 643 1055 683">Cambridge Independent</td> <td data-bbox="1055 643 1473 683">09 June 2021</td> </tr> <tr> <td data-bbox="595 683 1055 727">Cambridge News</td> <td data-bbox="1055 683 1473 727">09 June 2021</td> </tr> </tbody> </table> <p>Hard copies of the SoCC were also displayed at the Community Access Points listed in the document.</p> <p>Further detail on the Applicant’s preparation, consultation and publication of its SoCC is contained in section 5 of the Consultation Report (Application Document Reference 6.1).</p>	Publication	Date	Cambridge Independent	09 June 2021	Cambridge News	09 June 2021
Publication	Date							
Cambridge Independent	09 June 2021							
Cambridge News	09 June 2021							
17	Does the SoCC set out whether the development is EIA development; and does it set out how the Applicant intends to publicise and consult on the Preliminary Environmental Information?	<p>Yes.</p> <p>The SoCC states that CWWTPR is EIA development and sets out how the Applicant intends to publicise and consult on the Preliminary Environmental Information in Section 7 (Environmental Information) and Section 9 (How we will consult).</p> <p>See Appendix 8 of the Consultation Report (Section 47 Duty to Consult Local Community – Final Statement of Community Consultation Application Document Reference 6.1.8)).</p>						
18	Has the Applicant carried out the consultation in accordance with the SoCC?	<p>Yes.</p> <p>The Applicant carried out the pre-application consultation in accordance with the SoCC, as agreed with host local authorities, as demonstrated in Appendix 9 of the Consultation Report (Statement of Community Consultation, Compliance Checklist Application Document Reference 6.1.9)).</p>						

Section 48: Duty to publicise the proposed application

19	Did the Applicant publicise the proposed application in the prescribed manner set out in Regulation 4(2) of the APFP Regulations?	The Applicant prepared and publicised the application in the prescribed manner set out in Regulation 4 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 by publishing a Section 48 notice (see Appendix 24 of the Consultation Report (Section 48 Notice Advertisements Application Document Reference 6.1.24)):		
		Publication	1st Insertion	2nd Insertion
		Cambridge Independent	16 February 2022	23 February 2022
		Cambridge News	17 February 2022	24 February 2022
		The Guardian London Gazette	24 February 2022 24 February 2022	n/a n/a

		Newspaper(s)	Date
a)	for at least two successive weeks in one or more local newspapers circulating in the vicinity in which the Proposed Development would be situated;	Yes	<ul style="list-style-type: none"> Cambridge Independent: 16 and 23 February 2022 Cambridge News: 17 and 24 February 2022
b)	once in a national newspaper;	Yes	The Guardian: 24 February 2022
c)	once in the London Gazette and, if land in Scotland is affected, the Edinburgh Gazette; and	Yes	The London Gazette: 24 February 2022
d)	where the proposed application relates to offshore development – (i) once in Lloyds List; and (ii) once in an appropriate fishing trade journal?	n/a	n/a

20	Did the s48 notice include the required information set out in Regulation 4(3) of APFP Regulations?	Yes		
Information		Paragraph	Information	Paragraph
a) the name and address of the applicant		Para 1	b) a statement that the Applicant intends to make an application for development consent to the Secretary of State	Para 1
c) a statement as to whether the application is EIA development		Para 3	d) a summary of the main proposals, specifying the location or route of the Proposed Development	Para 5
e) a statement that the documents, plans and maps showing the nature and location of the Proposed Development are available for inspection free of charge at the places (including at least one address in the vicinity of the Proposed Development) and times set out in the notice		Para 6	f) the latest date on which those documents, plans and maps will be available for inspection	Para 6
g) whether a charge will be made for copies of any of the documents, plans or maps and the amount of any charge		Para 8	h) details of how to respond to the publicity	Para 10
i) a deadline for receipt of those responses by the Applicant, being not less than 28 days following the date when the		Para 6 (24 February – 27 April, providing 63 days for the consultation)		

	notice is last published		
21	Are there any observations in respect of the s48 notice provided above?		
22	Has a copy of the s48 notice been sent to the EIA consultation bodies and to any person notified to the Applicant in accordance with the EIA Regulations10?	Yes. The Applicant provided a copy of the Section 48 notice to all Section 42 consultees (including those notified to the Applicant pursuant to Regulation 11(1)(c) alongside a covering letter in accordance with the EIA Regulation 13. See Appendix 26 of the Consultation Report (Notification to Section 42 Consultees of Section 42 Consultation) (Application Document Reference 6.1.26) .	
s49: Duty to take account of responses to consultation and publicity			
23	Has the Applicant had regard to any relevant responses to the s42, s47 and s48 consultation?	The Applicant has had regard to all relevant responses made pursuant to Section 42, Section 47 and Section 48 in accordance with Section 49. A summary of relevant responses received and how the Applicant has considered these is provided in the Consultation Report (Application Document Reference 6.1) , specifically in Sections 9 and 10 , and in Appendix 2: Applicant Regard to Section 47 Consultation Responses, Appendix 3: Applicant Regard to Section 42 Consultation Responses and Appendix 31: Applicant Regard to Targeted Statutory Consultation under Section 42 Planning Act 2008. (Application Document References 6.1.2,6.1.3 and 6.1.31) .	
Guidance about pre-application procedure			
24	To what extent has the Applicant had regard to statutory guidance 'Planning Act 2008: Guidance on the pre-application process'?	The Applicant has had regard to the Department for Communities and Local Government (2015): Guidance on the pre-application process in undertaking its consultation process and in preparation of the Consultation Report (Application Document Reference 6.1) . Consultation Report Appendix 1 Compliance Checklist (Application Document Reference 6.1.1) provides a compliance checklist which sets out how the Applicant has had regard to the Guidance.	

25	Summary: Section 55(3)(e)	
s55(3)(f) and s55(5A): The application (including accompaniments) achieves a satisfactory standard having regard to the extent to which it complies with section 37(3) (form and contents of application) and with any standards set under section 37(5) and follows any applicable guidance under section 37(4)		
26	<p>Is it made in the prescribed form as set out in Schedule 2 of the APFP Regulations, and does it include:</p> <ul style="list-style-type: none"> • a brief statement which explains why it falls within the remit of the Planning Inspectorate; and • a brief statement that clearly identifies the location of the application site, or the route if it is a linear scheme? 	<p>Yes. The Application Form (Application Document Reference 1.2) is in the prescribed form as set out in Schedule 2 of the APFP Regulations and:</p> <ul style="list-style-type: none"> • Section 4 of the Application Form explains why the development falls within the remit of the Planning Inspectorate; and • Section 6 of the Application form identifies the location of the scheme. The Application is also accompanied by a Location and Scheme Order Limits Plan (Application Document Reference 4.1).
27	Is it accompanied by a Consultation Report?	<p>Yes. Application Document Reference 6.1 and its accompanying appendices.</p>
28	Where a plan comprises three or more separate sheets, has a key plan been provided showing the relationship between the different sheets?	<p>Yes – A key plan is included as part of the following series of plans all of which comprise three or more separate sheets:</p> <ul style="list-style-type: none"> • General Arrangement Plans (Document series 4.2) • Works Plans (Document series 4.3) • Land Plans (Document series 4.4) • Rights of Way Plans (Document series 4.6) • Access & Traffic Regulation Plans (Document series 4.7) • Hedgerow Regulations and Tree Preservation Plans (Document series 4.8) • Statutory and Non-Statutory Designated Sites Plans (Document series 4.15)

		<ul style="list-style-type: none"> • Habitats and Waterbodies Plans (Document series 4.16) • Historic Environment Plans (Document series 4.17) 		
29	Is it accompanied by the documents and information set out in APFP Regulation 5(2)?	Yes – as set out below.		
	Information	Document	Information	Document
	a) Where applicable, the Environmental Statement required under the EIA Regulations and any scoping or screening opinions or directions	Application Document Reference 5.2 - 5.4 inclusive.	b) The draft Development Consent Order (DCO)	Application Document Reference 2.1
	Is this of a satisfactory standard?		Is this of a satisfactory standard?	
	c) An Explanatory Memorandum explaining the purpose and effect of provisions in the draft DCO	Application Document Reference 2.2	d) Where applicable, a Book of Reference (where the application involves any Compulsory Acquisition)	Application Document Reference 3.3
	Is this of a satisfactory standard?		Is this of a satisfactory standard?	
	e) A copy of any Flood Risk Assessment	Application Document Reference 5.4.20.1	f) A statement whether the proposal engages one or more of the matters set out in section 79(1) of the Environmental Protection Act 1990 (statutory nuisances) and if so how the Applicant proposes to mitigate or limit them	Application Document Reference 7.13
	Is this of a satisfactory standard?		Is this of a satisfactory standard?	

<p>h) A Statement of Reasons and a Funding Statement (where the application involves any Compulsory Acquisition)</p>	<p>Application Document References 3.1 and 3.2 respectively</p>	<p>i) A Land Plan identifying:- (i) the land required for, or affected by, the Proposed Development; (ii) where applicable, any land over which it is proposed to exercise powers of Compulsory Acquisition or any rights to use land; (iii) any land in relation to which it is proposed to extinguish easements, servitudes and other private rights; and (iv) any special category land and replacement land</p>	<p>Plans at Document Series 4.4</p>
<p>Is this of a satisfactory standard?</p>		<p>Is this of a satisfactory standard?</p>	
<p>j) A Works Plan showing, in relation to existing features: - (i) the proposed location or (for a linear scheme) the proposed route and alignment of the development and works; and (ii) the limits within which the development and works may be carried out and any limits of deviation provided for in the draft DCO</p>	<p>Works Plans showing the proposed location of the development; and the limits within which the development and works may be carried out Document Series 4.3 has been submitted with the application.</p>	<p>k) Where applicable, a plan identifying any new or altered means of access, stopping up of streets or roads or any diversions, extinguishments or creation of rights of way or public rights of navigation</p>	<p>Access and Rights of Way Plans identifying any new or altered means of access, stopping up of streets or roads or any diversions, extinguishments or creation of rights of way or public rights of navigation have been submitted with the application Document Series 4.6 (Rights of Way Plans) and 4.7 (Access and Traffic Regulation Order Plans).</p>
<p>Is this of a satisfactory standard?</p>		<p>Is this of a satisfactory standard?</p>	

<p>l) Where applicable, a plan with accompanying information identifying:</p> <ul style="list-style-type: none"> - (i) any statutory/ non-statutory sites or features of nature conservation eg sites of geological/ landscape importance; (ii) habitats of protected species, important habitats or other diversity features; and (iii) water bodies in a river basin management plan, together with an assessment of any effects on such sites, features, habitats or bodies likely to be caused by the Proposed Development 	<ul style="list-style-type: none"> (i) Statutory and Non-Statutory Designated Sites Plans (Document Reference 4.15) (ii) Habitat and Waterbodies Plans (Document Reference 4.16) (iii) Habitat and Waterbodies Plans (Document Reference 4.16) <p>The assessments are contained in Chapters 8 (Biodiversity), 13 (Historic Environment), 15 (Landscape and Visual) and 20 (Water Resources) of the Environmental Statement (Documents 5.2.8, 5.2.13, 5.2.15 and 5.2.20) and their accompanying appendices.</p>	<p>m) Where applicable, a plan with accompanying information identifying any statutory/ non -statutory sites or features of the historic environment, (eg scheduled monuments, World Heritage sites, listed buildings, archaeological sites and registered battlefields) together with an assessment of any effects on such sites, features or structures likely to be caused by the Proposed Development</p>	<p>Historic Environment Plans (Document Reference 4.17).</p> <p>The assessment is contained in Chapter 13 (Historic Environment) of the Environmental Statement (Document 5.2.13) and its accompanying appendices.</p> <p>See also the following ES Figures: 5.3.13.1 to 5.3.13.6 - Built Heritage Within the 1KM and 500M Study Areas and 5.3.13.9 to 5.3.13.15 - Archaeological Remains in the 1km Study Area.</p>
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Hedgerows and Important Hedgerows are also identified on the **Hedgerow and Tree Preservation Plans (Document Series 4.8)**.

See also the following ES Figures:
5.3.8.2 and 5.3.8.3 - Statutory Designated Sites and Non-statutory Designated Sites, 5.3.20.1 – Hydrology, 5.4.8.2 – Hedgerow Survey, 5.4.8.11 - Great Crested Newt Baseline Report, 5.4.8.20 - Bat Ghost Licence Figures, 5.4.8.21 - Confidential Badger Ghost Licence MS Figures, 5.4.8.3 – Water Vole Report Figures, 5.4.8.5 – Reptile Baseline Report Figures, 5.4.8.6 – Invertebrates Baseline Report Figures, 5.4.8.7 - Bat Report Figures, 5.4.8.8 – (Confidential) Badger

	Baseline Report and 5.4.8.9 – Otter Baseline Report Figures.		
Is this of a satisfactory standard?		Is this of a satisfactory standard?	
n) Where applicable, a plan with any accompanying information identifying any Crown land	Plans at Document Series 4.5	o) Any other plans, drawings and sections necessary to describe the development consent proposal showing details of design, external appearance, and the preferred layout of buildings/ structures, drainage, surface water management, means of vehicular and pedestrian access, any car parking and landscaping	<p>Document Reference 4.1 (Location and Scheme Order Limits Plan)</p> <p>Document Series 4.2 (General Arrangement Plans)</p> <p>Document Series 4.8 (Hedgerow Regulations & Tree Preservation Plans)</p> <p>Document Series 4.9 (Proposed Waste Water Treatment Plant Plans and Sections)</p> <p>Document Series 4.10 (Buildings Gateway Building Floor and Roof Plans)</p> <p>Document Series 4.11 (Highways Plans)</p> <p>Document Series 4.12 (Sewer Tunnel and Longitudinal Section)</p> <p>Document Series 4.13 (Outfall & Effluent Storm Pipeline Plans and Sections)</p>

			Document Series 4.14 (Waterbeach Pipeline Long Sections)
Is this of a satisfactory standard?		Is this of a satisfactory standard?	
p) Any of the documents prescribed by Regulation 6 of the APFP Regulations:	N/A	q) Any other documents considered necessary to support the application	Document Reference 1.1 (Application Letter) Document Reference 1.3 (Guide to the application) Document Reference 1.4 (Generic Glossary) Document Reference 7.1 (Consents and other permits register) Document Reference 7.2 (Statement of Requirement) Document Reference 7.3 (Site Selection Report (NTS)) Document Reference 7.5 (Planning Statement) Document Reference 7.6 (Design and Access Statement) Document Reference 7.8 (Community Liaison Plan) Document Reference 7.11 (Initial Equalities Impact Assessment (EqIA)) Document Reference 7.12 (EqIA)
Are they of a satisfactory standard?		Is this of a satisfactory standard?	

30	Are there any observations in respect of the documents provided above?	
31	Is the application accompanied by a report identifying any European site(s) to which Regulation 48 of The Conservation (Natural Habitats, &c.) Regulations 1994 applies; or any Ramsar site(s), which may be affected by the Proposed Development, together with sufficient information that will enable the Secretary of State to make an appropriate assessment of the implications for the site if required by Regulation 48(1)?	Yes. Application Document Reference 5.4.8.15 and 5.4.8.16
32	If requested by the Planning Inspectorate, two paper copies of the application form and other supporting documents and plans	No paper copies have been requested by the Planning Inspectorate.
33	Has the Applicant had regard to statutory guidance 'Planning Act 2008: Application form guidance', and has this regard led to the application being prepared to a standard that the Planning Inspectorate considers satisfactory?	Yes, the Applicant has had regard to the 'Planning Act 2008: Application form guidance'.
34	Summary - s55(3)(f) and s55(5A)	

The Infrastructure Planning (Fees) Regulations 2010 (as amended)

Fees to accompany an application

35	Was the fee paid at the same time that the application was made?	The Application fee was paid on Friday 20 January 2023 by CHAPS and the Planning Inspectorate acknowledged receipt of the fee on Monday 23 January 2023.
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Cambridge Waste Water Treatment Plant Relocation – WW010003

Section 51 advice regarding draft application documents submitted by Anglian Water Services Ltd

On 01 July 2022 and 15 July 2022 Anglian Water Services Ltd submitted the following draft documents for review by the Planning Inspectorate as part of its Pre-application Service¹:

- 1 Draft Development Consent Order and supporting plans
- 2 Explanatory Memorandum
- 3 Statement of Reasons
- 4 Book of Reference
- 5 Land Plans
- 6 Environmental Statement – Project Description
- 7 Environmental Statement – Odour Chapter
- 8 Habitats Regulations Assessment
- 9 Consultation Report

10. Flood Risk Assessment

¹ See <https://infrastructure.planninginspectorate.gov.uk/application-process/pre-application-service-for-applicants/>

The Applicant also submitted a document which included focus areas it wished for the Planning Inspectorate to review. The advice recorded in the table comprising this document relates solely to matters raised upon the Planning Inspectorate's review of the draft application documents, and not the merits of the proposal. The advice is limited by the information provided and time available for consideration and is raised without prejudice to the acceptance or otherwise of the eventual application.

Draft Development Consent Order and supporting plans			
Ref No.	Article, Requirement or Schedule	Planning Inspectorate Comment/Question	The Applicant Comment/Amendment
1	General	<p>Drafting The Development Consent Order (DCO) should be:</p> <ul style="list-style-type: none"> • In the Statutory Instrument (SI) template • Follow guidance and best practice for SI drafting (for example avoiding "shall/should") in accordance with the latest version of guidance from the Office of the Parliamentary Counsel; • Follow best practice drafting guidance from the Planning Inspectorate and the Departments in Advice Note 15 – Drafting development consent orders (and see specific references to Advice Note 15 below); • Fully audited to ensure that there are no inconsistencies within the DCO and its constituent parts such as definitions or expressions in the articles, requirements, protective provisions, other schedules and any Book of Reference (BoR) that all legislative references in the DCO are to extant provisions and all schedules refer to the correct articles. (See for example Article 2 'access and traffic regulations order plans' which refers to Schedule 15, when it should be Schedule 17; or Article 2 'appeal documentation' which uses of 'discharging body' rather than the defined term 'discharging authority'); • Also, definitions should be precise, accurate and relatively easily understandable. (e.g. if a definition is drafted in a way that obliges the reader to cross refer to wording in multiple other documents in order to understand the definition, then it is not easily understandable). Where any registered company is referred to in the DCO (it should be defined by using its full and precise company name and company registration number (as those appear on the register held by Companies House); • Kept under constant review by the applicant throughout any examination so that definitions are kept up to date by them as matters evolve – e.g.: any definition of 'Environmental Statement' (ES) in the context of how/the purposes for which it is referred to in the DCO; or how plans and drawings are defined (and where possible include drawing/revision numbers); • Where the Explanatory Note at the end of a draft DCO states that documents will be available for inspection at a third party location, it should be confirmed in writing that the stated third party has agreed to that; and • The drafting should be, unambiguous, precise, and achieve what is intended, be consistent with any definitions or expressions in other provisions of the DCO, follow guidance and best practice for SI drafting referred to above. 	<p>The DCO is in the SI template. This has been verified and a Validation Report is submitted with the application.</p> <p>All references to "shall/should" have been checked and amended. This has also been checked in the protective provisions.</p> <p>It is considered that the DCO does accord with Advice Note 15.</p> <p>A full audit has been carried out prior to submission.</p> <p>Definitions have been re-reviewed in line with PINS comments. All references to a registered company include the precise company name and registration number.</p> <p>The DCO will be constantly kept under review until the end of the Examination.</p> <p>The Applicant will check with the third party location reference with South Cambridgeshire Council and confirm in due course.</p> <p>It is considered that best practice has been followed - this will be kept under review.</p>
2	Articles 5 and 6 and Schedule 1 'Site Wide works'	<p>Flexibility The extent of any flexibility provided by the DCO should be fully explained, such as the scope of maintenance works and ancillary works, limits of deviation and any proposed ability (through tailpieces) of discharging authorities to authorise subsequent amendments.</p> <p>The preferred approach to limiting this flexibility is to limit the works (or amendments) to those that would not give rise to any materially new or materially different environmental effects to those identified in the ES. Also, further as to tailpieces, see section 17 of Advice Note 15.</p> <p>The drafting which gives rise to an element of flexibility (or alternatives) should provide clearly for unforeseen circumstances and define the scope of what is being authorised with sufficient precision. There does not appear to be a definition of 'commence'. In relation to flexibility to carry out advance works, any "carve out" from a definition of "commencement" should be fully justified and it should be demonstrated that such works are de minimis and do not have environmental impacts which would need to be controlled by requirement. See section 21 of Advice Note 15. Pre-commencement requirements should also be assessed to ensure that the "carve out" from the definition of "commencement" does not allow works which defeat the purpose of the requirement.</p>	<p>The extent of flexibility has been re-reviewed following PINS' comments. With regards to Articles 5, 6 and Sch 1 in particular:</p> <p>- Article 5 - this refers to "maintain" which is defined in article 2. The definition states that any activities of maintenance must not result in a significant environmental effect not assessed in the ES.</p> <p>- Article 6 - this article has been re-drafted since submission to PINS. It now refers to specific limits of deviation for specific works, as well. However, the article does not expressly state that the limitation of deviation are limited to those which do not give rise to any materially new or materially different environmental effects to those identified in the ES as the limits are as per that assessed in the ES.</p> <p>- Schedule 1 Site Wide Works - these are confined to works "which fall within the scope of work assessed by the environmental statement".</p> <p>A definition of 'Commencement' has been added.</p>
3	Article 3	<p>Development Consent etc Granted by the Order. It may be appropriate to include reference to Schedule 2 to more precisely identify the requirements that the authorisation for development consent is subject to.</p>	<p>This has been considered but is not deemed necessary as "requirements" is defined in article 2 by reference to Schedule 2. It is therefore clear that the authorised development is subject to the Requirements.</p>
4	Article 6 and Explanatory Memorandum	<p>Limits of deviation It is noted that in accordance with Advice Note 15 the article does not include a tailpiece. The Explanatory Memorandum (EM) does not include an explanation of the need for the amount of the potential deviation. It would be helpful if this were included, and justification is likely to be needed during examination, including in relation to the broad scope of Article 6 (c) ii 'downwards as may be found to be necessary or convenient' and the impact such deviation may have on the construction use of the development. It is noted that the EM anticipates that a requirement will be included to ensure that the development is confined to the parameters assessed within the ES, and we encourage this. See comments above regarding 'flexibility'.</p>	<p>The Explanatory Memorandum has been re-drafted in parts since the draft submission to PINS and this includes the explanation for the limits of deviation. The Explanatory Memorandum refers to the specific chapters and paragraphs of the Environmental Statement where limits of deviation are assessed.</p>

5	Article 6	<p>While the wording broadly seems fine (some concerns with wording set out in subsequent points), the works plans do not indicate the limits of deviation. Without the limits of deviation clearly marked, the article does not stand.</p> <p>In terms of wording, further justification in the EM for what constitutes positioning is suggested. A 2-metre vertical limit of deviation could be 10-20% more than the proposed height, which seems excessive. Cross reference in the EM where this has been justified in the ES.</p>	<p>The Works Plans have been amended to address this and the limits of deviation are now shown on the Works Plans.</p> <p>As above, the Explanatory Memorandum has been re-drafted in parts since the draft submission to PINS and this includes the explanation for the limits of deviation. The Explanatory Memorandum refers to the specific chapters and paragraphs of the Environmental Statement where limits of deviation are assessed. Article 6 refers to the limits of deviation not exceeding the 'levels' (in respect of particular Work No.s). 'Levels' is defined as 'the levels as shown on the sections'. The definition of 'sections' lists the specific drawings as certified in Schedule 17.</p>
6	Article 8	<p>Is the word 'above' required in paragraph 2?</p> <p>Notwithstanding the provision for consent from the SoS and applications of the restrictions of the Order, Article 8 does not provide for the qualification of the transferee. Given the specialist nature of this work, the lack of qualification for the person that the benefits of the order can be transferred to, needs to either be included in the draft DCO or justified in the EM.</p>	<p>The word "above" has been removed.</p> <p>Article 8 does provide for the qualification of a transferee in that the Secretary of State has ultimate approval. We have considered other DCOs and consider this approach to be standard, see by way of example: The Northampton Gateway Rail Freight Interchange Order 2019, The A428 Black Cat to Caxton Gibbet Development Consent Order 2022 and The Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014. Further justification and explanation has been added to the Explanatory Memorandum.</p>
7	Article 12	<p>The provisions of Article 12 are too broadly drawn. Like Articles 10 and 11, the reference to relevant Schedules should provide a bar to the limitlessness of 'any street' and for 'any reasonable time' in paragraph (1) which the wording in the articles does not appear to provide. There also appears a contradiction between paragraphs 1(b) and 3. It is unclear why the condition for consultation and consent in paragraph 5 is only for the provisions in paragraph 4 and not also for paragraph 1.</p>	<p>This article has been redrafted since the draft submission to PINS. Reference to 'any' street has been retained. This is because Article 12 still requires the undertaker to obtain the consent of the street authority and therefore there is a limit on its powers. Further, the street authority may attach reasonable conditions to the consent.</p>
8	Article 20	<p>The provision to enter 'land which is adjacent to the building or structure but outside the Order limits', needs further justification. Notwithstanding the 14 days' notice period, this provision could mean effecting a party that has not been consulted with for the Proposed Development (PD). Definition is needed of land outside order limits, the extent of it, who it belongs to, have they been consulted, and so on.</p>	<p>Additional justification has been added to the Explanatory Memorandum. There may be circumstances where it is not possible determine how the powers under Article 20 are to be exercised by confining surveys and access to land within the Order limits only. The power is restricted in that Article 20(3)(b) states that land outside the Order limits may only be entered 'where reasonably necessary'. Although 'land outside Order limits' is not defined, Article 20(3)(b) restricts entry to land which is 'adjacent to the building' (that building being the building which is subject to the exercise of powers under Article 20). The applicability of this power is therefore restricted to a specified area. This is addition to the need for entry being 'reasonably necessary'.</p>
9	Article 21	<p>The provision to 'enter on any land shown within the Order limits or which may be affected by the authorised development', could again include land outside the order limits. This needs further justification, or the definition of what land which may be affected by the authorised development means, the extent of it, who it belongs to, have they been consulted, and so on.</p>	<p>As above, it may not be possible for surveys and investigations required in order to carry out the authorised development to be confined to land within the Order limits. The Article requires notice to be given to every owner and occupier at least 14 days in advance and compensation is payable in the event of loss or damage. Extension to land outside Order limits has precedent and this is detailed in the Explanatory Memorandum. Further, this power means such land does not need to be subject to compulsory acquisition or temporary possession powers.</p>
10	Articles 26-34	<p>Compulsory acquisition and extinguishment of rights</p> <p>These provisions (and any relevant plans) should be drafted in accordance with the guidance in Advice Note 15, in particular sections 23 (extinguishment of private rights over land) and 24 (restrictive covenants). Justification and explanation for the creation of any new rights, or extinguishment of existing rights should be provided. These rights must be clearly identified and described to enable affected persons to have sufficient information for meaningful consultation. Where an applicant wishes to create and compulsorily acquire new rights over land, those rights should be fully, accurately and precisely defined for each relevant plot and the compulsory acquisition should be limited to the rights described. This could be achieved by limiting the compulsory acquisition of new rights to those described in a schedule in the DCO or to those described in the BoR.</p> <p>While noting from the draft Statement of Reasons (SoR) that the Order Land does not include Crown Land, compulsory acquisition of an interest in land held by or on behalf of the Crown, cannot be authorised through this or any other article. The DCO should reflect this. Where the intention is to compulsorily acquire some other person's interest in that same land, that can only be done if the appropriate Crown authority consents to it under section 135(1) of the Planning Act 2008 (PA2008).</p> <p>In all respects (including in relation to the BoR), the applicant should follow <i>Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land</i> published by DCLG (now DLUHC) in September 2013.</p>	<p>It is considered that the compulsory acquisition provisions are drafted in accordance with guidance and good practice. In particular, the creation of rights have been specifically defined and limited to the nature of works and authorised development required in relation to each particular plot, this is then defined and limited by the DCO schedules and explained in the Book of Reference, Statement of Reasons and on the Land Plans.</p> <p>The Applicant is aware that the DCO cannot authorise compulsory acquisition of Crown Land and where necessary in respect of rights/CA needed on land in which there is a Crown interest, a section 135 application will be sought.</p>
11	Article 30	<p>Acquisition of land limited to subsoil</p> <p>The approach is noted. Whether the acquisition is justified is something which is likely to be explored during examination (if the application is accepted).</p>	<p>Noted.</p>

12	Article 35	It is possible that 14 days' notice may not be considered adequate, especially where TP is being acquired from farmland where more formal notice could be needed for farming operations.	14 days is the standard notice period, consistent with many recently made orders such as The A57 Link Roads Development Consent Order 2022, The M25 Junction 10/A3 Wisley Interchange Development Consent Order 2022, The Drax Power (Generating Stations) Order 2019, The Sizewell C (Nuclear Generating Station) Order 2022, The Thurrock Flexible Generation Plant Development Consent Order 2022 and The A47 Blofield to North Burlingham Development Consent Order 2022
13	Article 41	<p>Statutory undertakers and Apparatus Where a representation is made by a statutory undertaker (or some other person) that engages section 127(1) of the PA2008 and has not been withdrawn, the SoS will be unable to authorise compulsory acquisition powers relating to that statutory undertaker land unless satisfied of specified matters set out in section 127. If the representation is not withdrawn by the end of the examination, the ExA will need to reach a conclusion whether or not to recommend that the relevant statutory test has been met in accordance with section 127.</p> <p>The SoS will be unable to authorise removal or repositioning of apparatus (or extinguishment of a right for it) unless satisfied that the extinguishment or removal is necessary for the purpose of carrying out the development to which the order relates in accordance with section 138 of the PA2008. Justification will be needed to show that extinguishment or removal is necessary.</p>	<p>The Applicant is aware of this position. The article is contained in many other DCOs and is considered necessary to ensure the undertaker has the powers needed to deliver the authorised development should this power be needed. The article is subject to the protective provisions which cover the arrangements between the relevant parties in respect of the need to relocate any apparatus and therefore this power provides the necessary land powers should they be needed to deliver any such relocation etc.</p> <p>This has been justified and explained in the Explanatory Memorandum and Statement of Reasons.</p>
14	Articles 11-18	<p>Streets These are broad powers, and not withstanding other precedents, justification should be provided as to why these powers are appropriate and proportionate having regard to the impacts on road users, residents and pedestrians. We note that 'guillotine clauses' are included meaning that deemed consent is granted if the other party does not respond within the specified time limit. Given that it is important that applications for consents are properly considered, and that upon receiving an application the authority may not be aware that the guillotine is in place, it might assist if there was a condition that any application must include suitable wording to bring the authority's attention to the guillotine. The timescales should be adequately justified.</p> <p>We note from paragraph 6.12 of the EM that there is 'safeguarding provision' for Article 11 that 'sufficient information must be provided'. It would be helpful if there was an explanation as to what is meant by 'sufficient information', and who decides whether the information provided is 'sufficient'. Further, should the 'safeguarding position' of the condition that 'all the relevant information' must be provided with any application for consent be included in other articles where deemed consent is possible by way of a guillotine clause (for example Articles 12, 14 and 17).</p>	<p>Deemed consent is essential because without it there is no swift route to a decision which could stall the delivery and implementation of the consent/a particular part of the authorised development. Deemed consent is widely accepted as being appropriate in nationally significant infrastructure projects for this reason. However, since the draft submission to PINS, the articles which contain deemed consent have been amended to require the undertaker to notify the relevant consent-giver of the deemed provisions. Further, the deemed provisions do not apply if the consent-giver acknowledges a request for consent and therefore only apply if there is an absence of any engagement from the consent-giver.</p> <p>As above, the deeming provisions are considered necessary for a development of this scale and only apply in the event the relevant highway authority does not acknowledge the application for consent.</p>
15	49 and Explanatory Memorandum	<p>Disapplication or amendment of legislation/statutory provisions</p> <p>The guidance in section 25 of Advice Note 15 should be followed, and the following information provided:</p> <ul style="list-style-type: none"> •the purpose of the legislation/statutory provision •the persons/body having the power being disappplied •an explanation as to the effect of disapplication and whether any protective provisions or requirements are required to prevent any adverse impact arising as a result of disapplying the legislative controls •by reference to section 120 of and Schedule 5 to the PA2008 how each disappplied provision constitutes a matter for which provision may be made in the DCO. <p>Where the consent falls within a schedule to the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015 evidence will be required that the regulator has consented to removing the need for the consent in accordance with section 150 PA2008.</p>	Noted and it is considered that the draft DCO adheres to Advice Note 15 including the guidance in section 25. Further detailed explanation has been added to the Explanatory Memorandum but none of the consents in the IP (IPMPP) Regs 2015 are disappplied in the DCO.
		<p>Crown Rights Noting paragraph 1.1.6 of the draft SoR, if there is a restrictive covenant for the benefit of the Crown, then consent under section 135 (1) and (2) should also be obtained from the Crown authority.</p>	As above, the Applicant is aware and this will be pursued and a new Article dealing specifically with Crown Rights has been added to the draft DCO.
16	Articles 22-25	<p>Felling or lopping of trees, removal of hedgerows and trees subject to preservation orders The guidance in section 22 of Advice Note 15 should be followed. It is noted that schedules relating to the felling and lopping of trees, and trees in a conservation area and/or subject to a tree preservation order is not included. See section 22.1 and good Practice point 6 of Advice note 15. There does not appear to be an explanation for this in the EM. The 'felling or lopping' article is drafted to allow such actions to trees both within and 'near r any part of the authorised development. Consideration should be given to whether this should be amended so that it only applies to trees within or encroaching upon the Order Limits.</p>	These articles and schedules have since been updated and are more specific, identifying the relevant trees/hedgerows. Further explanation has been included in the Explanatory Memorandum with reference to relevant Environmental Statement chapter.
17	Article 48 and Schedule 2	<p>Procedure for discharge of Requirements Advice Note 15 provides standard drafting for articles dealing with discharge of requirements. If this advice hasn't been followed (for example the omittance of '3. 1 Fees') justification should be provided as to why this is the case.</p>	The Advice Note has been followed only with the omission of fees.

18	Article 19	<p>Discharge of Water Be aware of and mindful of section 146 of the PA2008.</p>	<p>It is not considered that any amendments are required. This section relates to an order granting development consent which authorises the discharge of water into inland waters or underground strata and has the effect that the person to whom the order is granted does not acquire the power to take water or require discharges to be made from the source of water mentioned in the order. What the provision does is make it explicit that although the DCO may confer power on the undertaker to put water into inland water or underground strata, the undertaker cannot then take water back out (unless it otherwise has power to do so – e.g. the applicant for the DCO is a water company already having such powers).</p>
19	Articles 35-36	<p>Temporary Use of Land Given the parliamentary approval to the temporary possession regime under the Neighbourhood Planning Act 2017 ('NPA 2017'), which were subject to consultation and debate before being enacted, should any provisions relating to notices/counter notices which do not reflect the NPA 2017 proposed regime (not yet in force) be modified to more closely reflect the incoming statutory regime where possible? As examples:</p> <ul style="list-style-type: none"> • The notice period that will be required under the NPA 2017 Act is 3 months, substantially longer than the 14 days required under Article 35. Other than prior precedent, what is the justification for only requiring 14 days' notice in this case? • Under the NPA 2017, the notice would also have to state the period for which the acquiring authority is to take possession. Should such a requirement be included in this case? • Powers of temporary possession are sometimes said to be justified because they are in the interests of landowners, whose land would not then need to be acquired permanently. The NPA 2017 Act provisions include the ability to serve a counter-notice objecting to the proposed temporary possession so that the landowner would have the option to choose whether temporary possession or permanent acquisition was desirable. Should this article make such provision – whether or not in the form in the NPA 2017? <p>There should be justification as to why the undertaker would need to remain in temporary possession of the land for one year after the relevant construction has been completed.</p>	<p>It is noted that the land in Schedule 13 to the Order of which only temporary possession may be taken, relates principally to construction access and worksites which will not be required for a lengthy period and furthermore affects land which is not currently occupied for active uses</p>
20	Article 9	<p>Defence to proceedings in respect of statutory nuisance Justification for inclusion of this this protection against claims for statutory nuisance is likely to centre around whether there is sufficient mitigation secured through the DCO or elsewhere to justify the defence to a statutory nuisance claim provided by this article. It would be helpful if these could be signposted in the EM.</p>	<p>The Statutory Nuisance Statement provides an explanation of the assessment of whether any nuisance would arise and addresses the mitigation secured.</p>
21	Requirements	<p>It is noted that requirements have not been included in the dDCO provided. This limits the ability to make meaningful comments. It is noted that there is a distinct lack of the appearance of the PD, its visual impact and related provisions to control the design process and outcomes post consent, or at least it is difficult (in the absence of the requirements and full document suite) to understand how this is proposed to be secured.</p>	<p>Requirements have been drafted as per Schedule 2.</p>
22	General	<p>The Draft Works Plans appear to largely meet the requirements of Regulation 5(2)(j)(i) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 in so far as the Works Plans show the proposed location and alignment of the development and works.</p> <p>The Draft Works Plans do not appear to meet the requirements of Regulation 5(2)(j)(ii) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 as the Draft Works Plans do not clearly show the limits of deviation described in Article 6 of the draft Development Consent Order (dDCO).Limits of deviation are not represented in the legend shown on the Draft Works Plans. Overall, it is unclear where limits of deviation apply to individual works (i.e. – Work no. 15).</p>	<p>Noted. Works Plans have undergone further refinement since the draft submission.</p> <p>A note has been added to the legend to the Works Plans clarifying the limits of deviation and linking to Article 6</p>
23	General	<p>The Draft Works Plans appear to meet the requirements of Regulation 5(3) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 in so far as the Works Plans are no larger than A0 size; show the direction of North and are drawn to an identified scale (albeit the scales are not consistent across the suite of Draft Works Plans).</p>	<p>Works Plans have undergone refinement since the draft submission and the identified scales are now consistent across all drawings.</p>
24	General	<p>The Draft Works Plans appear to meet the requirements of Regulation 5(4) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 as a Key Plan showing the relationship between the different Draft Works Plans sheets is provided.</p>	<p>Noted</p>
25	General	<p>It can be difficult to identify the specific works within each Work Number. For example, identifying the individual highway works (Work No. 1) (a) – (j) on Draft Works Plans Sheet 2.</p>	<p>All DCO Plans have been reviewed to improve visual clarity of work areas and labels prior to formal submission.</p>
26	Works Plans Sheets 2 and 10	<p>Works No. 1 in the dDCO is Highways Works. This is shown highlighted in yellow on Sheet 2. However, Works No. 1 is also shown as Gateway/Welcome Building on Sheet 10. These are different works and therefore should have different Work Numbers in Schedule 1 of the dDCO.</p>	<p>Works names have been amended to remove the possibility of confusion. Work no. 1 is highway works and Work no. 19 is the gateway building.</p>
27	Works Plans Sheet 10	<p>The Works Plans should clearly show how the Works relate to one another. This is not always the case. For example, Works No. 4 (Inlet Works and Preliminary Treatment) could more clearly show 'connections' (4(i)) to Work Nos. 6, 8 and 16 on Draft Works Plans Sheet 10.</p>	<p>The Works Plans identify particular works areas and the plans read in conjunction with Schedule 1 to the DC which identifies, where relevant, particular works connect or relate to each other. The detail of the connections are then identified on the Design Plans (Document series 4).</p>

28	Works Plans Sheet 10	Works No. 5 is shown as 'Electrical Supply and Power Generation' in Schedule 1 of the dDCO. This is reflected in the legend on the Draft Works Plans however the label on Sheet 10 reads '05 – Electrical Substation'. There should be consistent labelling across the documentation. Similarly, Works No. 7 is shown as 'Workshop & Parking' in Schedule 1 of the dDCO but labelled as 'Site Offices and Parking' in Draft Works Plans Sheet 10. Furthermore, why do Works No. 7 and Works No. 31 both refer to Workshop? Works No. 31 is described as a Temporary Compound Area in Schedule 1 of the dDCO but is referred to as Workshop, Laboratory and Maintenance Area in Draft Works Plans Sheet 10.	The description of the authorised development in Schedule 1 and the Works Plans have been reviewed in conjunction with each other.
29	Works Plans Sheet 10	Works No. 9 is shown as 'Gas to Grid and/or Combined Heat and Power (CHP)' in Schedule 1 of the dDCO (our emphasis). There appears to be no explanation as to why Works No.9 is shown as 'Gas to Grid or Combined Heat and Power (CHP)' (our emphasis) on Draft Works Plans Sheet 10. It should be clearly identified whether this is 'and' or 'and/or'.	The description of the authorised development in Schedule 1 and the Works Plans have been reviewed in conjunction with each other.
30	Works Plans Sheet 1	It could seem that the arrow to Works No. 18 (Interception Shaft) is showing Works No. 21 (Transfer Tunnel) on Draft Works Plans Sheet 1. The distinction between Works should be clear and easily identifiable.	The description of the authorised development in Schedule 1 and the Works Plans have been reviewed in conjunction with each other.
31	Works Plans Sheet 2	Works No. 23 is shown as 'Temporary Access Works to Works 30, 33 & 36 (West of Horningsea Road)' in Schedule 1 of the dDCO. The label on Draft Works Plans Sheet 2 for Works No. 23 also references temporary access works for Work No. 21. Why is Work No. 21 not mentioned under the description of Work No. 23 of the dDCO?	The description of the authorised development in Schedule 1 and the Works Plans have been reviewed in conjunction with each other.
32	Works Plans Sheet 3	The Legend for Work No. 30 (Waterbeach Pipeline North) does not appear to correspond to the shading/hatching given to Work No. 30 on Draft Works Plans Sheet 3.	Legend colours reviewed to match drawings
33	Works Plans Sheet 2	Works No. 32 (New Bridleway) is shown as '32. Waterbeach Pipeline Construction Area' on Draft Works Plans Sheet 2. This needs to be corrected.	The description of the authorised development in Schedule 1 and the Works Plans have been reviewed in conjunction with each other.
34	Works Plans	Where is Works No. 38 (Gateway Building) on the Draft Works Plans?	The description of the authorised development in Schedule 1 and the Works Plans have been reviewed in conjunction with each other.
35	Access & TRO Plans	There is no key provided on Sheet 10 of the Access & TRO Plans. There should be consistency between the dDCO and the Access & TRO Plans. For example, the stopping up of the A14 Mainline Eastbound between points SU1 and SU2 appears to be shown as Westbound (rather than Eastbound) on Sheet 10. The key provided on the Access & TRO Plans contains 'Article 13 Temporary Stopping Up of Streets'. This is Article 12 in the dDCO. Similarly Article 19 in the key is not correctly cross referenced to the relevant Article in the dDCO. The labelling of any access to works should be clear and consistent. It is not clear where the reference OA2-2 is shown on Sheet 2 of the Access & TRO Plans.	The relevant Schedules and the Access and Traffic Regulation Order Plans have been reviewed in conjunction with each other.
36	Rights of Way Plans	It is unclear where the new permissive path/cycle track between points C1 and C2 is shown on Sheet 4, as described in the dDCO. There should be consistency between the Rights of Way Plans and the dDCO.	This path has now been removed from the drawings.
37	General	Requirements: it is difficult to provide a full review of the dDCO without seeing the draft requirements and thus being able to understand how necessary control documents, mitigation and potentially compensation are secured.	Noted. Requirements are now included at Schedule 2.
38	General	Decommissioning: it is noted that there is no article in relation to the decommissioning of the project. Will this be provided and has this been assessed?	It is not intended to decommission the proposed WWTP as it is designed to accommodate future flows until the end of the plan period (2041) and then to be capable of expansion. Decommissioning is addressed in the Project Description Chapter of the ES at paragraph 1.9.56. An exception to decommissioning is the Waterbeach Pipeline as this may need to be decommissioned if it is required to take flows into the existing Cambridge WWTP for an interim period. Whether or not this is required depends upon the build out rate of Waterbeach New Town.

Explanatory Memorandum			
Ref No.	Article, Requirement or Schedule	Planning Inspectorate Comment/Question	The Applicant Comment/Amendment
39	General	Guidance in Advice Note 15 should be followed. In particular section 1.4 and to note that as well as providing an explanation as to what a particular provision does, to explain why it is necessary for this particular dDCO. The extent of the justification should be proportionate to the degree of novelty or likely controversy that is expected from the inclusion of the particular provision.	Noted. PINS preference for significant/substantial detail in the EM is noted - consideration to be given and as much explanation as is possible to be added.
40	General	Cross referencing between the EM, the DCO and other documents should be checked and updated. (For example, the reference to Article 10.41 to Article 41 appears to be incorrect). The document will also need to be checked for typographical errors before the final version is submitted. If a justification that one could reasonably expect to be contained in the EM is in fact contained in another document, then this should be clearly signposted.	Noted. All cross referencing will be checked before submission.
41	General	Notwithstanding that the drafting precedent has been set by previous DCOs or similar orders, full justification should be provided for each power/provision, taking into account the facts for this particular dDCO. Where drafting precedents in previous made DCOs have been relied on, these should be checked to identify whether they have been subsequently refined or developed in the most recent DCOs so that the DCO provisions reflect the SoS' current policy preferences. If any general provisions (other than works descriptions and other drafting bespoke to the facts of this particular application and DCO) actually differ in any way from corresponding provisions in the SoS' most recent made DCOs, it would be preferable for an explanation to be provided as to how and why they differ (including but not limited to changes to statutory provisions made by or related to the Housing and Planning Act 2016).	Noted.
42	General	All instances of novel drafting should be clearly identified in the EM. The purpose of and necessity for any provision which uses novel drafting, and which does not have precedent in a made DCO or similar statutory order should be explained in the EM. The PA2008 power on which any such provision is based should also be identified in the EM.	Noted - the relevant power from the 2008 Act is now referenced in the Explanatory Memorandum.

Statement of Reasons			
Ref No.	Article, Requirement or Schedule	Planning Inspectorate Comment/Question	The Applicant Comment/Amendment
43	Para 4.3.4	STC and FFT should be set out in full as first (possibly only) time used.	Noted for STC and correction made and included in Glossary.FFT no longer used.
44	Para 4.3.21	This paragraph incorrectly referred to National Grid. The connection will be with Cadent Gas Also confirm whether this means National Grid Electricity Transmission or another company. Please confirm whether the connection agreements are in place and if not, when they will be secured or what would happen if the connection agreements are not secured.	This paragraph referred to the national grid meaning the nations gas grid. The point was noted and, as a result, changes were made to the BoR submitted as part of the Application.The STC will require a new gas connection that will be supplied by Cadent Gas. The connection agreements and capacity have been checked and confirmed with Cadent. The Applicant is in discussions with Cadent regarding a connection agreement and the related Protective Provisions.
45	Para 4.3.30	Typographic error – Spacing required between ‘9mtall’.	The comment was noted. The wording has been deleted as a result of text changes in the SoR submitted as part of the Application. The relevant paragraph number has changed to 4.4.19.
46	Para 9.1.4	Typographic error – Sentence does not make grammatical sense.	This comment was noted. The wording has been deleted as a result of text changes in the SoR submitted as part of the Application. The relevant paragraph number has changed to 1.7.1.
47	General	Inconsistent spelling throughout – see ‘Metres’ and ‘Meters’.	Noted and rectified.
48	Para 6.4.5	Incorrect referencing to paragraphs within the Planning Inspectorate’s ‘Advice Note Fifteen: Drafting Development Consent Orders’. Paragraph 6.4.5 refers to paragraphs 26.1-26.3 of the Inspectorate’s Advice Note. Paragraph 6.4.5 notes that these paragraphs ‘advise that it may be appropriate to include a power to impose restrictive covenants over part of the land which is subject to compulsory acquisition or use under the DCO’. This is incorrect. Paragraphs 26.1-26.3 refer to the geographical scope of DCO and Deemed Marine Licenses.	This comment was noted and, as a result, the correct paragraph number (24) has been inserted in the SoR submitted as part of the Application. The relevant paragraph number has changed to 6.4.4.

49	Table 6-3	The table following Table 6-3 is not labelled.	Noted. Table 6.3 now labeled "Land over which new rights will be acquired and restrictions imposed"
50	Para 7.3.1	This paragraph refers to 'Appendix A' of the SoR. This is shown as 'Appendix 1'.	This point was noted and, as a result, a the correct reference to Appendix 1 was inserted. The relevant paragraph number has changed to 7.3.2.
51	Pare reference missing	Level of detail in Powers sought in the Order (1.3) – should this be Section 1.5 as Section 1.3 is blank? The categorisation of the types of powers sought appears overly complicated. Feedback on this has been covered in greater detail under the land plan feedback section.	This point was noted. Changes to the structure of the SoR since the submission of the draft to PINS have resulted in this information now being located in section 6. The number of categories of land has been reduced (see comment 65 and 70 in the Land Plans section).
52	Section 5	Reference to work numbers and plots numbers, associated with each component of the project is missing. This is essential for the affected persons to understand why their land is required for the project, and the ExA will rely on it in their reasoning to the SoS.	This point was noted. All work numbers, Land parcel (plot) numbers have been inserted into the SoR submitted as part of the Application. A detailed chedule of plots and work numbers has been provided at Appendix 3 of the SoR.
53	Section 6	The purpose for which land may be acquired in all tables in Section 6 are inadequate. This should provide further justification, for instance where it says plot 4a is required for landscaping, why is this landscaping essential and how does that reason meet section 122 of the PA2008? It is noted that further justification is provided in the BoR, but Section 5 and 6 should set out the narrative why each plot of land is essential for the PD. Reference to relevant Articles cannot be tested because the Articles are not specified. The corresponding explanation in the EM should be complimentary and not conflicting.	These points were noted and, as a result, significant additional information has been included in the SoR. These are contained in Sections 5 and 6 and Appendix 3 of the SoR submitted with the Application.

54	Appendix B	<p>Appendix B: Current status of negotiations with landowners and occupiers</p> <p>The summary of negotiations is inadequate, it should show if negotiations are far enough progressed for the case to be examinable. A clearer picture should be provided, potentially using a scale of progression, highlighting any major objections, and reasons for objections. It is unclear what stage 'lengthy negotiations' are at. It would also be helpful to indicate next steps for negotiations.</p>	<p>These points were noted and, as a result, significant additional information has been included in the SoR. These are contained in Appendix 2 (previously Appendix B) of the SoR submitted with the Application.</p>
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Book of Reference			
Ref No.	Article, Requirement or Schedule	Planning Inspectorate Comment/Question	The Applicant Comment/Amendment
55	General	'Introduction' sections are not prescribed so not needed, but sometimes they can be helpful if they are concise.	This point was noted and, as a result, an introduction has been incorporated into the BoR submitted as part of the Application.
56	General	Further (non-prescribed) parts to a BoR should not be provided, all of the required information should be included in the prescribed parts.	This comment was noted and, as a result, all the required information has been included in the prescribed parts of the BoR submitted as part of the Application.
57	Parts 2a and 2b	The BoR should comprise of 5 parts. We note that part two is split into two 2a and 2b. This means that contrary to the legislation and guidance there appears to be 6 parts to the book reference. Furthermore, while 2b helpfully states that this part relates to Category 3 land, 2a does not.	These points were noted and, as a result, changes were made to the BoR submitted as part of the Application.
58	Parts 3-5	These are unpopulated, however the description of what might be included appears to be consistent with the legislation and guidance.	These points were noted. The BoR submitted as part of the Application is fully populated.

Land Plans			
Ref No.	Article, Requirement or Schedule	Planning Inspectorate Comment/Question	The Applicant Comment/Amendment
59	General	The Draft Land Plans appear to meet the requirements of Regulation 5(2)(i) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 in that the Plans show; the land required for, or affected by, the PD; any land over which it is proposed to exercise powers of compulsory acquisition; and any land in relation to which it is proposed to extinguish easements, servitudes and other private rights.	Noted.
60	General	The Draft Land Plans appear to largely meet the requirements of Regulation 5(3) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 in so far as the Plans are no larger than A0 size and are drawn to an accurate scale (not smaller than 1:2500). However, the Applicant should ensure that any plan clearly shows the direction of North (see Draft Land Plan Sheet 1).	This point was noted and has been rectified on the Land Plans submitted as part of the Application.
61	General	Regulation 5(4) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 state that, where a plan comprises three or more sheets (such is the case for the Applicant), a key plan must be provided showing the relationship between the different sheets. Although a Location Plan is shown in the bottom right corner of each Draft Land Plan Sheet, it could be clearer if this was enlarged and shown on a separate sheet. This could act as a reference point and could help Affected Persons visualise the scale of the PD, and the relationship between the Sheets.	This point was noted and has been rectified on the Land Plans submitted as part of the Application.
62	General	The number of inset maps provided appears adequate. When providing an inset map, the portion of the map being referred to should be easily identifiable. This is not consistent throughout the Sheets (see Sample Extract of Land Plans).	This point was noted and has been rectified on the Land Plans submitted as part of the Application.
63	Sheet 2	The 'Continuation to Sheet X' labelling should be accurate and reflect the distribution of the Draft Land Plan Sheets displayed in the Location Plan. Draft Land Plan Sheet 2 states 'For Continuation see Sheet 2' on the left of the Sheet. Should this read 'For continuation see sheet 1' instead? Should Draft Land Plan Sheet 2 have a label showing 'For Continuation see Sheet 3' on the right of the Sheet?	This point was noted and has been rectified on the Land Plans submitted as part of the Application.
64	General	Schedules 10, 11 and 12 of the dDCO do not contain the plot numbers shown on the Draft Land Plan Sheets. When populating this, the plots should be in the correct place (i.e. – if land on the Plans is identified as permanent, it should be under the correct Permanent article and Schedule in the dDCO.)	This point was noted and the Schedules submitted as part of the Application are now fully populated

65	General	<p>The categories for the types of acquisition proposed for Compulsory Acquisition and Temporary Possession in the Draft Land Plan Sheets appears to be more than seen across other Nationally Significant Infrastructure Projects. This needs further explanation in the SoR.</p>	<p>This point was noted and has been rectified by reducing the number of categories shown on the Land Plans, and explained in the SoR (see, particularly, sections 1.6 and 6.5), both submitted as part of the Application. See also comment 70.</p>
66	General	<p>"Paragraph 1.5.6 of the SoR provides a generic explanation of the three types of acquisitions. It could be beneficial if this is explained further, setting out:"</p> <ol style="list-style-type: none"> a. "what rights it intends to acquire; b. for what period (temporary or permanent); c. was this clarified to the Affected Persons during consultations (along with necessary references to the Consultation Report where that is evidenced; and d. the article and schedule in the dDCO where this is secured, along with signpost to the explanation in the EM. <p>For example, could the blue shading with green hatch be explained? Is it permanent new right or new rights over a temporary period? Given that it could be either, how has this been consulted on with the landowners?</p>	<p>This point was noted and this information has been included in the various relevant documents submitted as part of the Application.</p> <p>See Appendix 2 of the Statement of Reasons for details of discussions with each landowner and sections 4.6 and 4.10 of the Consultation Report for details of discussions with landowners.</p>
67	General	<p>Are the New Rights with blue shading Permanent New Rights?</p>	<p>Yes, they are permanent new rights. Any temporary rights are denoted with green shading.</p>
68	General	<p>There is no reference in the SoR and dDCO to Highway Land (shaded in orange in the Draft Land Plan Sheets). What is the proposal here; and if there isn't an acquisition proposed, could it be explained why it is in the Draft Land Plans?</p>	<p>This point was noted and has been rectified by later versions of the various documents submitted as part of the Application. Please see paragraphs 6.6.6 to 6.6.8 in the SoR.</p>

Land Plans			
Ref No.	Article, Requirement or Schedule	Planning Inspectorate Comment/Question	The Applicant Comment/Amendment
69	General	Why has 'Intervention with Third Party Rights' been identified? What is Third Party? Paragraph 1.5.9 of the SoR is unclear in this regard. Affected Persons must always be identified as Category 1 or 2 (or 3) persons, and that should be identified in the Book of Reference only, not in the Land Plans. If Third Party refers to a party that the undertaker may transfer DCO powers to, that too does not need to be identified because the DCO powers will be given only to the undertaker in the first instance.	This point was noted and the references have been updated to refer to the interference with private rights pursuant to Articles 31 and 32 of the draft DCO.
70	General	Clarity is crucial in Land Plans, especially for consulting with Affected Persons. The several colours are not helpful in this regard. Could the purple colour ('No Rights Being Sought') be explained? Is this outside the Order Limits? If so, could it be shaded grey (i.e - same as 'Land Outside of Order Limits').	This comment has been superseded by later amendments to the Land Plans, including reduction of number of colours. There is no longer a category of "no rights sought"
71	General	There appears to be a disconnect between the Sample Extract of Land Plans, the Draft Land Plans and the BoR. There is also a disconnect between the colour coding in the Sample Extract of Land Plans and the Draft Land Plans. The Variables listed under the Legend and overall map layout is not consistent between the Sample Extract of Land Plans and the Draft Land Plans. Consistency is needed here.	This comment has been noted but has been superseded by later amendments to the Land Plans.
72	General	The referencing in the Sample Extract of Land Plans corresponds with the BoR. The Inspectorate notes that the referencing shown in the Sample Extract is quite simplistic and notes Compulsory Acquisition plans are often more nuanced. The unique references in the Sample Extract of Land Plans correspond with the BoR, but the Draft Plans do not. The same land parcels identified in the Sample Extract of Land Plans and the Draft Plans share different unique reference numbers.	These comments were noted and have been rectified in the Land Plans submitted as part of the Application.

73	General	The description given to the location of the land plots in the BoR corresponds to the siting of the land plots on the Sample Extract of Land Plan.	Noted but no comment required.
74	General	Parcel Boundaries are generally clear and identifiable. However, it is advised that the plots on the Land Plan sheets are searchable to help Interested Parties easily identify certain plots.	This comment was noted and a search function has been provided on the Land Plans submitted as part of the Application.

Environmental Statement – Project Description			
Ref No.	Article, Requirement or Schedule	Planning Inspectorate Comment/Question	The Applicant's response
75	General	The ES should include a reference list as required by Schedule 4 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and consider the use of a glossary for technical terms. It is not always explained in the project description what different technical terms mean.	Reference lists are provided at the end of each technical chapter. There is a separate full glossary of terms (General Glossary, Application Document Reference 1.4)
76	General	<p>The project description contains a lot of information about the built elements of the PD but is less detailed in terms of its operation, particularly in relation to discharges to the river (both during 'normal' and 'storm' operation). The Inspectorate understands that there is not a "single point" between operations ceasing at the existing Cambridge Wastewater Treatment Works (WWTW) / Waterbeach Water Recycling Centre (WRC) and operation beginning at the PD. We note that this would be phased (for example the potential for adding further treatment at a later date noted in paragraph 2.2.3), and the transfer of operation between the old and new works, including the interim permit stages that are indicated will be needed are not included. There is also an indication that there will be an interim stage where the existing Cambridge WWTW will be treating additional flow from new housing development until the new Cambridge WWTW is fully operational, and it is unclear whether this is within its current capacity.</p> <p>We also note that the discharge from the new works will be different in quality and quantity from the existing works, and that these details are matters of ongoing discussions with the Environment Agency. The ES should explain the stages of the PD and where there is a phased approach to construction and operation, including details of these phases and their timings (including any interim stages of operational development that would result in future changes to the permitted discharge standards). This is so it is possible to understand how this affects the assessment, what assessment years are considered in the ES and to see that a consistent position has been applied across the ES.</p>	The stages of the PD are described at section 3 of the Environmental Statement Project Description Chapter (Application Document reference 5.2.2), by reference to indicative and worst case assessment years. The phasing of the project is described at sections 1.6.4 to 1.6.6. This description includes at 3.1.10 the transition from the existing to proposed WWTW, maintenance activities (section 3.6), lighting (1.8.25 - 1.8.30), chemical consumption (1.8.39), operational odour, including the operational odour management plan (1.8.46-1.8.49) and operational traffic (2.4.7 - 2.4.9). The operation of the individual project components is described within their description (e.g. sludge treatment 1.7.8-1.7.21 as part of the sludge treatment centre in section 1.7).
77	General - options	The project description makes reference in several places to elements where options are still under consideration, such as the technology for effluent treatment and energy generation from gas. An explanation of the options still under consideration, and a description of what they will be, should be included within the ES including how the options are capable of being delivered under the DCO consent. (See also general points below about the 'Rochdale envelope').	The optionality sought in the DCO is explained in Table 1-2 of the Environmental Statement Project Description ("Design Envelope")(Application Document reference 5.2.2). The table has been amended to include details of where that optionality is secured in the draft DCO.

78	Section 1.2	<p>This section could benefit from reference to plans and figures at the outset that show the location of the various elements described in the text. In addition, where locations or structures are referred to in the text, these should be shown on a figure for ease of reference (for example – at paragraph 1.3.9 Waterbeach New Town Development Area and Waterbeach Train Station are mentioned without reference to where these are on a map).</p> <p>References to any features should also be kept consistent across the chapter and where possible, consider whether there is a need for multiple names for the same feature to avoid confusion. For example, the document begins by referring to the ‘existing Cambridge Wastewater Treatment Works’, but later in the chapter this site becomes referred to as ‘Milton’ or ‘Milton WRC’.</p>	<p>A context plan is included at Figure 1.2 and a layout plan is included at figure 1.4 of the Environmental Statement Project Description (Application Document reference 5.2.2). A consistent naming protocol has been adopted for the application. The terms "proposed waste water treatment plant" and "proposed WWTP" are used to refer to the proposed development and the "existing Cambridge Wastewater Treatment Works" or "existing Cambridge WWTP" are used to refer to the site and works at Milton.</p>
79	Para 1.3.4	<p>Paragraph 1.3.4 begins by discussing current operational permits without describing where these discharge to, to what standard, and how this would change. It isn't clear from the project description how and when the phased transfer of current operations at Cambridge WWTW to the new STW will occur nor what parameters the assessment has been based on.</p>	<p>The current discharge location is described at paragraph 3.4.4 ("decommissioning of existing Cambridge WWTP), the baseline for water quality includes the Cambridge WWTW - details of the current discharge permit are included at table 3-1 of Chapter 20: Water Resources of the Environmental Statement (Application Document Reference 5.2.20)</p>
80	Section 2	<p>Section 2 and Figure 2-1 ‘main development design’ provide a simple introduction to the sewage treatment process but do not cover all of the processes that would be part of the PD. There seem to be other processes at the new operational works that are not included (such as storm treatment, inlet and pumping stations) within this section. The subsequent sections of the Project Description introduce new treatment features such as ‘terminal pumping station’ and inlet pumping station’, ‘valve chambers’ and ‘flow monitoring devices’ that are not included in this ‘main development design’ section for example making it difficult to understand where they occur in the treatment process. The project description might benefit from a more general description of the process, and block diagrams showing the features of the process that are relevant to the assessment, to provide further context for the descriptions of each feature.</p>	<p>A general description of the process is set out at section 1.6.1 of the Environmental Statement Project Description (Application Document reference 5.2.2) with an overview figure provided at figure 1.3. A labelled layout figure showing context is provided at figure 1.4.</p>
81	General	<p>Given the technical nature of the PD, any features described in the text should be shown on an accompanying plan. There are several references to – for example – inlet and terminal pumping station – that are introduced with limited explanation and their locations should be shown on accompanying diagrams or figures.</p>	<p>Figure 1.4 of the Project Description (Application Document reference 5.2.2) shows the location of each of the headings used in the project description to describe the processes and equipment. Greater detail is provided in the works plans accompanying the application (Application Document Reference 4.3)</p>

82	Section 1.4	<p>Rochdale Envelope. This section is key to the assessment of effects but only dealt with very briefly. Please refer to our Advice Note Nine (Rochdale Envelope) for further advice on how to approach the Rochdale Envelope.</p> <p>It is not clear which elements of the PD are fixed and which elements of the PD require more flexibility from the information provided so far. While details of the aspect – specific parameters are proposed to be contained within aspect chapters, for consistency there should be an over-arching approach such that is possible to see:</p> <ul style="list-style-type: none"> • Those elements of the design where flexibility is sought and those elements where it is not; • The elements of the PD where options remain, what these options are and what has therefore been assessed; • The chapters where further information can be found. <p>Elsewhere in the chapter there are numerous references to potential options still being considered for example, in working methods for road crossings and the technology within the treatment process. However, the options are presented in limited detail to be able to understand what has been considered and / or assessed.</p>	<p>The optionality sought in the DCO is explained in table 1-2 of the Environmental Statement Project Description chapter (Application Document reference 5.2.2) ("Design Envelope"). The table has been amended to include details of where that optionality is secured in the draft DCO. The approach to the design envelope is described at Section 1.5 and in Chapter 5:EIA methodology (Application Document reference 5.2.5) at paragraphs 3.8.3 to 3.8.6</p>
83	Para 2.2.3	<p>Phasing – it is not clear what activities will be potentially carried out in the second phase of construction and how this will be assessed. For example, a description of the effect on the operation of the PD at the two stages of delivery and what parameters have been assumed for the purposes of the assessment(s).</p>	<p>The approach to phasing, and its assessment, is described at paragraphs 1.6.4 - 1.6.6 of the Environmental Statement Project Description chapter (Application Document reference 5.2.2)</p>

84	Para 2.2.14	The sizing of the storm tanks to be complete in the first phase is not described i.e., their future design capacity with climate change allowances etc.	<p>The sizing of the storm tanks has been agreed with the Environment Agency as part of the environmental permitting discussions. As discussed in the Environmental Statement at Chapter 9: Climate Resilience (Application Document Reference 5.2.9), the plant has been designed to be resilient under the UKCIP climate projections for the 2090s. Changes in catchment management (including the requirement for SuDs on future developments) means that the required storm capacity for the 2090s has a high degree of uncertainty and so cannot currently be assessed. A storm model was run to simulate storm flows for ten consecutive years, during which the maximum simulated storm experienced was 13,873m³ (compared to the 20,400m³ capacity) which would result in no storm water discharge incidents to the River Cam (paragraph 2.9.14 of Chapter 9). The transfer tunnel provides an element of storm attenuation and additional storage which contributed in the model towards the management of the flows. There is, therefore, at present, sufficient capacity to accommodate both anticipated population growth and climate change. It is possible that additional storm storage capacity would be required into the 2050s-2070s in response to changes in the frequency or magnitude of storm events or in response to changes in the environmental permitting regime. As discussed at section 1.6.6 of the Environmental Statement Project Description (Application Document reference 5.2.2), the design of the plant provides sufficient space to accommodate the need for additional storm storage in the future, if required. Any requirement for additional storage capacity will be established through the environmental permitting regime and discharge consent for the proposed development.</p>
85	Para 2.3.15	This section introduces piling as a method, but no details are included as to the method, durations, locations or numbers of piles that have been assumed in the assessment.	<p>The piling methodology is outlined at section 3.3 (Construction Techniques as Methodology) of the Environmental Statement Project Description chapter (Application Document reference 5.2.2), a summary of the worst case for the assessment of piling is provided at section 1.5 (Design Envelope). No percussive piling methods will be employed on the main site although they may be required at the outfall.</p>
86	Para 3.3.2	This paragraph indicates that the new town development will start to become operational before the PD is fully operational requiring an interim situation where the existing Cambridge WWTW still operates. It is unclear what (if any) additional capacity is expected during this period and what work is required for the existing Cambridge WWTW to treat the additional flows, and whether there are any implications in terms of the PD.	<p>The transition from the Cambridge WWTW to the proposed WWTW is discussed at paragraph 3.1.10. There would be sufficient capacity to treat these flows and therefore are no implications in terms of the PD.</p>

	<p>87 General</p>	<p>The project description is missing details of the sludge treatment centre (during construction and operation on site and the quantity of sludge transfers from other sites), the operation of the PD, the operation and construction of the energy recovery systems (such as CHP and potential Battery Storage), including possible gas flares. It is also missing details of, for example, the operational vehicle movements (or cross references to further details in this respect). The chapter also omits reference to the relationship with existing and new environmental permits and any assumptions that have been made as part of the EIA as to how the works will operate (e.g., water quality elements which are key to the assessment of water resources and the changes that will occur to the “baseline” once the PD is operational). The Inspectorate understands that a separate “other consents and licenses” document is being prepared as part of the application and so the ES should cross refer to further detail /explanation in this and any other relevant documents in clearly explaining the position.</p> <p>Although the proposed landscape, recreation or enhancements proposed are captured elsewhere in the ES (paragraph 1.3.6) it should be clear what information the assessment has been based on in the project description.</p> <p>Phasing - there appear to be ‘interim’ stages of development before the new works is in operation. These appear to be stages between the new works being operational and the old works being decommissioned, the interim situation where the new works is not complete and the old works needs to continue operating to cover the increased capacity from additional housing, and another interim stage where the new works will be a phased development with some elements of the treatment process being built out at a later date once the new works is completed. We note from our review of the HRA that there is reference to an ‘interim permit’.</p> <p>These should be represented in the assessment years for the assessment which may be within other chapters of the ES, but for ease of reference, it should link to the way in which the project description is also set out.</p> <p>The project description currently focusses on the built infrastructure and less on the operational changes / characteristics of (for example) flow, quality, water levels during normal and storm events.</p>	<p>The design capacity of the sludge treatment centre is set out at paragraph 1.7.1 of the Environmental Statement Project Description chapter (Application Document reference 5.2.2) with the number of transfers from other sites described as part of the traffic assessment and summarised at paragraph 2.4.8 and in Table 2-2. The changes to water resources and assumptions in respect of the baseline are set out the Water Resources chapter (Chapter 20, Application Document reference 5.2.20) which includes details of the current permit.</p> <p>The landscape, ecological and recreational management plan outlined in paragraphs 1.8.56 - 1.8.60 of the project description has informed the assessments for landscape and visual, historic environment, community impacts and ecology - as discussed at 1.8.61 these are secured in the DCO which contains a requirement to deliver the LERMP.</p> <p>Phasing is discussed at paragraphs 1.6.4 to 1.6.6 with discussion on the transition from the Cambridge WWT to the proposed WWT described at paragraph 3.1.10. Realistic and worst case assessment years are set out at paragraphs 3.1.1 to 3.1.10.</p>
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88	Figure 4-1	<p>The construction phasing packages figure refers to 'demolition existing site' which involves 'site clearance and demolition'. However, demolition as part of the decommissioning activities at the existing Cambridge WWTW is excluded from the assessment in paragraph 1.3.4 of the chapter. This is a little unclear and perhaps could be better clarified in terms of the assessment of construction effects.</p>	<p>Table 3.1 and section 3.4 of the Project Description (Application Document reference 5.2.2) have been amended to reflect that the demolition and redevelopment of the Cambridge WWTW are outside of the scope of the DCO. The chapter has been amended to include at Section 3.4 a list of the decommissioning activities which are sought under the DCO. The cumulative effects assessment of the ES (Chapter 21, Application document reference 5.2.21) considers the cumulative effect of the demolition and redevelopment.</p>
89	Page 53	<p>The figure (no reference number) on this page indicates a construction programme between 2024 and 2028. Paragraph 2.2.3 of the chapter however also refers to a second potential future phase of construction in the 2030's which is not described in this figure. The potential for future construction phases (their necessity, optionality and extent) should be clearly set out in the ES in so far as they are within the scope of the consent for which the DCO is seeking.</p>	<p>The phasing and potential expansion of the proposed development is discussed at paragraph 1.6.4 to 1.6.6 of the Project Description ((Application Document reference 5.2.2)</p>

Environmental Statement – Odour Chapter			
Ref No.	Article, Requirement or Schedule	Planning Inspectorate Comment/Question	The Applicant Comment/Amendment
90	General	There are a number of grammatical errors, incorrect references and units of measure throughout the document.	The Applicant notes the comment and the final version has been updated to correct these points.
91	Para 1.3.6	The odour chapter refers to both an Operational Management Plan and an Odour Management Plan, abbreviating both to OMP making it unclear in places which the chapter is referring to. The ES should clearly set out which documents abbreviations refer to and how the two plans co-exist in terms of mitigating potential odour effects.	The comments are noted and as a result the chapter now refers to the Preliminary Odour Management Plan (OMP) (Application Document Ref 5.4.18.4), the need to prepare a detailed Odour Management Plan and removes reference to OMP in relation to generic 'Operational Management Plan' and replaces with 'Operation and maintenance activities would be subject to operational management plans and procedure.
92	Table 1-3 ID Para 3.14.5	The odour chapter does not provide consideration or further information relating to odour impacts from surface manhole vents as was set out in the Scoping Opinion. The ES should provide this information and assessment and/or clearly justify the basis on which it has been considered and excluded from the need for further assessment.	The comments are noted and the paragraph (now paragraph 1.4.1) has been amended to confirm that further information on the operation of surface manhole valves is provided in Chapter 2: Project Description (Application Document Reference 5.2.2). They have been excluded from further assessment on the basis these are minor and intermittent sources of odour.
93	Para 3.1.2	The odour chapter states that the existing Cambridge WWTP is located approximately 1km from the proposed WWTP. Paragraph 1.2.2 of the project description states the distance is approximately 2km. Please ensure consistency throughout the ES.	The Applicant notes the comment. The finalised Odour chapter has been amended at paragraph 3.1.2 to read 2km.
94	Figure 4.1	Figure 4-1 provides a useful contour plot; however, a key would be useful and increased visibility of the earth bank which demarcates the proposed WWTP perimeter.	The comments are noted and figure 41 is updated to include a Legend/Key. The earth bank and its boundary is shown shaded in pale blue.

95	Para 5.1.3	The conclusion and summary of the odour chapter refer to minor adverse effects during abnormal operation of the proposed WWTP. The effects of abnormal operation are only referred to as negligible within paragraphs 4.2.35 and 4.2.37 and Table 6-1. The odour chapter should clearly detail where minor adverse effects are anticipated to occur and ensure consistency throughout the chapter and ES.	The comments are noted and are rectified in the finalised Chapter.
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Habitats Regulations Assessment			
Ref No.	Article, Requirement or Schedule	Planning Inspectorate Comment/Question	The Applicant Comment/Amendment
96	Table 1-1	For GDPR purposes in particular, it would assist if this table was anonymised or redacted at the point of submission.	These points were noted and, as a result, changes were made to the table in the final HRA submitted as part of the Application.
97	Tables 5-2 to 5-10 (General)	<p>These are large tables holding a lot of information. We would suggest considering the presentation of the information within them to ensure it is possible to follow the process of the assessment for each site and qualifying feature. This is particularly where these tables spread across multiple pages.</p> <p>In some cases, the table presentation makes it difficult to identify the effects on each qualifying feature and whether the features listed in the first column of the tables correspond to specific paragraphs in the text in the columns to their right. Mitigation is currently presented as general text points making it difficult to link effects on specific qualifying features with mitigation and thus the given conclusions. The assessment sometimes appears quite generic and could be applied to any site or feature rather than a specific assessment taking account of the site, its features, status and conservation objectives.</p> <p>The text sometimes muddles, for example, construction with operational effects or mitigation and there is sometimes repetition in the points under discussion within sections. Mitigation measures could be more clearly tied to the impacts and features they are intended to address.</p> <p>Measures such as agreement with the Environment Agency of the standards for the environmental permit are provided as evidence to demonstrate that changes from the new effluent discharge will not lead to adverse effects on integrity, however, these standards do not appear yet to have been confirmed and / or are reliant on separate consent under the environmental permit. The SoS as the competent authority will need to be satisfied that reliance can be placed on any measures necessary to avoid (beyond reasonable scientific doubt) adverse effects on the integrity of any European site(s). This applies particularly to the text at paragraphs 5.4.21 of the HRA Report.</p> <p>For some features, the 'risks' identified in column 2 are not specifically followed through to the narrative in column 3. In some cases (for example Fenland SAC, Table 5.3) new impacts are considered in column 3 that were not raised in column 2 as a risk.</p> <p>Where effects are discounted, evidence should be provided to support the conclusions (such as the statement in relation to Fenland SAC that distance means it is concluded there will be no appreciable change in temperature within the site).</p>	<p>The Applicant notes the comments and the HRA submitted as part of the application has as a result amended the format of these tables. Table 5.2 now table 61 with additional narrative on discounting impacts.</p> <p>The comments on paragraph 5.4.21 are noted and all other Consents and permits required by the consenting authority are set out in document 7.1 "Other Consents and Permits"</p>
98	Para 1.2.2	<p>Although there is no specific need to duplicate a project description in the HRA appropriate assessment report, if reference is made to this being available in the EIA and the HRA Screening Report, it would be useful to understand what changes may or may not have occurred between the preparation of the screening report and the preparation of the EIA and HRA Screening Report and whether this has affected the conclusions of Stage1. The screening report that was appended to the HRA Report reviewed by the Inspectorate had a number of comments and tracked changes. The Inspectorate suggests that in finalisation of the report(s), the screening report would perhaps benefit from more prominence as a standalone document with clear conclusions which then lead directly into the HRA Appropriate Assessment report. This would aid clarity in the reasons for sites being taken forward to AA and those that are screened out.</p> <p>In addition, it is noted from the review of the EIA Project Description that there are several elements of the PD where flexibility is sought or where options are still under consideration, such as the inclusion of a Combined Heat and Power plant. It would be helpful to highlight this in the HRA along with any implications for the assessment in demonstrating that a "worst case" has been adopted and that HRA has accounted for the full extent of the consent sought by the DCO.</p>	The comments are noted and as a result an additional summary of the design progression since screening is included at paragraph 1.2.4 of the HRA submitted as part of the Application.
99	Baseline	The HRA Report does not contain a section on the baseline or reference to how baseline conditions have been established (for example, through reference to the EIA).	The comments are noted and as a result an additional section 4 "Baseline" has been included in the HRA submitted as part of the Application to include Information Referred to at Screening, Information from the Environment Statement and Additional Data sources and can be found from paragraphs 4.1 to 4.3.1.
100	Para 3.1.0	It would be useful to also include in this section any other comments from / engagement with other agencies, NGO's (e.g. RSPB, the Wildlife Trusts etc) or local planning authorities in a HRA context.	The comments are noted and as a result the table included in the HRA submitted as part of the Application has been updated.
101	Para 4.1.2	<p>It would be useful to have an explanation of the reasoning behind the selection of a 10km radius from the Proposed Development with reference to the potential effects of the proposed development and any standard guidance.</p> <p>In addition, given that sites are screened in at a much greater distance than 10km, the approach taken to determining which sites further afield, or sites where factors other than distance were considered, were screened into the assessment should be expanded on.</p>	<p>The Applicant notes the comments and as a result paragraph 4.1.2 (now 5.1.3) includes narrative on the most recent guidance on ecological impact assessment (CIEEM, 2018).</p> <p>Bats are included as "non-distanced-constrained pathways" which includes hydrological links.</p>

102	Table 5-1	This table to a certain extent appears to duplicate the 'mitigation' column of the following tables 5-2 to 5-10. It notes management measures to prevent contamination of groundwater and from there, pollution to sensitive sites. It is noted in the EIA Project Description that there is potential for soakaways to be used as part of the drainage strategy which are not considered here as part of the drainage design.	The Applicant notes the comment and as a result the HRA submitted with the Application has been updated to align with the updated drainage strategy document 5.4.20.12
103	Table 5-3	Wicken Fen Ramsar – column 2 indicates there is potential for loss of functionally linked habitat and some confusion as to whether direct habitat losses are predicted. It isn't clear why the assessment focusses on birds when this is not a stated qualifying feature of the site.	The Applicant notes the comments and as a result the HRA has been updated to confirm no direct habitat loss at Wicken Fen Assessment considers qualifying features of: 1. One of the most outstanding and representative remnants of the East Anglian peat fens. The area is one of the few which has not been drained. Traditional management has created a mosaic of habitats from open water to sedge and litter fields. 2. The site supports one endangered species of Red Data Book plant, the fen violet <i>Viola persicifolia</i> , which survives at only two other sites in Britain. It also contains eight nationally scarce plants and 121 Red Data Book invertebrates. The GB Red Book considers the vascular plant <i>Senecio paludosus</i> as critically endangered; while <i>Myriophyllum verticillatum</i> and <i>Peucedanum palustre</i> are considered vulnerable.
104	Table 5-4	Devils' Dyke SAC – column 2 refers to impacts on populations of 'qualifying species' without explanation of what species it is referring to. (Reference to the reasons for selection of this site shows no Annex I or II species). The table concludes that air quality effects will be small from the emission sources within the WWTW without further evidence. The Inspectorate notes that slightly more information is provided on this point in the integrity matrices and that it is however reliant on modelling outputs not yet completed. Modelling for both traffic and emissions sources has not yet been complete and so the Inspectorate has not commented further on this section. However, the conclusions for air quality emissions should provide further evidence to support the conclusions that emissions will be small and controlled through stringent emission requirements.	The Applicant notes the comments and as a result appropriate cross reference have been added to refer to the air dispersion assessment now available as evidence for no appreciable effect.
105	Table 5-5	Fenland SAC – column 2, operational effects, begins by noting the potential for changes in water chemistry and water quantity from the new works' discharges, but the subsequent text only addresses effects from water level and temperature. The assessment does not consider the phased approach to operation indicated in the project description. The conclusion that there will be a requirement for no deterioration in quality in the River Cam and thus there will be no Adverse Effects on Integrity on the SAC would benefit from further supporting evidence on the basis of the current status of both the river and Fenland SAC. The conclusion is supported with limited evidence / discussion on the effects of any variations to the discharge permit standards (and what these may be), nor changes that might occur that are not related to quality, such as changes in flow or storm events.	The Applicant notes the comment and as a result the HRA is updated to confirm no hydrological links as also concluded in the Water Cycle Strategy 2008 available at: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-09/Integrated%20Water%20Management%20Study%20-%20Outline%20Water%20Cycle%20Strategy%20%28Stantec%29.pdf
106	Para 5.4.10 and Para 5.4.13	Mitigation – this section refers to the control measures within the noise and vibration section of the Code of Construction Practice and a noise and vibration management plan but does not mention specific effects to sites or qualifying features that this is designed to mitigate (or whether this is cited as a general provision).	The comments are noted and as a result the HRA submitted as part of the Application has been updated to clarify the proposed mitigation of specific effects to sites /qualifying features.

107	In-combination assessment	<p>This assessment is supported by more information in the integrity matrices but the Inspectorate recommends the detail / supporting evidence should be set out in full in the report, and that additional / new detail should not be deferred to the matrices, they should merely summarise / signpost to that evidence where it is presented in the report.</p> <p>The Inspectorate also notes that the assessment of in-combination effects in table 6-1 does not go to individual sites and individual qualifying features, only in broad terms against each of the identified projects. It may therefore be useful to be categorical in these conclusions being applicable to all sites and features and for the Applicant to be prepared that the examination may lead to exploration of these matters on a site / qualifying feature specific basis.</p> <p>It is also unclear if there are any offshore plans or projects that require consideration for the downstream in combination effects, for example changes in effluent nutrient levels affecting the availability of prey for qualifying species of birds.</p>	<p>The Applicant notes the comments and as a result the final HRA submitted with the Application has been updated to provide further supporting evidence.</p> <p>In combination effects statements has also been updated in relation to all sites and features.</p> <p>Applicant notes comments regarding examination.</p> <p>A review of offshore plans and projects to be included and discussed if relevant.</p>
108	Appendix A, Table 3 - 2	<p>Eversden and Wimpole Woods SAC - It is assumed that the HRA screen will provide an update on the position with this site, which has been screened out at Stage 1 of the process. We note Natural England is due to comment further on this site and whether it should be considered further at Stage 2.</p>	<p>The Applicant notes the comments and as a result additional text has been added in Table 3-1 to reflect the consultation engagement relevant to HRA.</p>
109	Appendix A	<p>It is noted that the advice from Natural England states that the Ouse Washes SPA, SAC and Ramsar sites should be screened into the assessment and that these sites are therefore considered in the integrity matrices.</p> <p>However, as a late addition, it appears that the document does not contain information about these sites; e.g. conservation objectives or conservation status, nor are there screening matrices for them.</p> <p>It is also noted that not all of the qualifying features for the Ouse Washes Ramsar have been included in the integrity matrices.</p>	<p>The comments are noted and as a result the HRA submitted with the Application has details for noted sites added to screening matrices.</p>
110	Appendix B	<p>The consultation records appendix was not included in the version reviewed by the Inspectorate</p>	<p>The comments are noted and as a result the HRA submitted with the Application has had these records included.</p>

111	Appendix C	<p>Integrity matrices – these contain more information than the tables within the main text and therefore present a better picture of the conclusions presented in the main report tables.</p> <p>There remain, however, gaps in the evidence to support statements that have been made and/or the conclusions that have been reached. For example, there is a general statement relevant to several of the conclusions that the final effluent quality standard is ‘expected to improve’ without saying what the standard will be, or how the SoS as the competent authority can rely on these assertions in concluding no adverse effect on integrity (AEoI) within the provisions of the DCO.</p> <p>There appear also to be gaps in the assessment of in-combination effects in terms of consideration of population growth and the extent of increase of flow into the river Cam. At present this results in a qualitative conclusion not supported by specific evidence.</p>	<p>The Applicant notes the comments and as a result further detail and evidence to support the appropriate assessment has been included within the HRA Report submitted with the Application.</p> <p>The assessment places reliance on regulatory function of the EA and the EPR in relation to water quality and quantity within the River Cam, and issues associated with phasing to be discussed prior to Application. This approach has been discussed with Natural England. The HRA report has benefitted from the supporting evidence provided with the EPR application provided to the EA.</p> <p>Reliance on regulatory function of the EA and the EPR in relation to water quality and quantity within the River Cam, and issues associated with phasing will continue to be discussed following submission of the Application and as the EPR permit, submitted in August 2022, is progressed.</p>
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Consultation Report			
Ref No.	Article, Requirement or Schedule	Planning Inspectorate Comment/Question	The Applicant Comment/Amendment
112	Covid-19 restrictions Para 11.2.1	<p>It is noted that a "Covid secure" approach was taken by carrying out small group meetings that did not exceed the "6-person rule" during phase one consultation. Once restrictions had eased during phase 2 statutory consultation, the Applicant took on board phase one statutory and non-statutory feedback and took a largely "face-to-face" approach, reintroduced larger group meetings and individual meetings.</p> <p>While unfortunate that non-statutory consultation could not be undertaken in person, the Applicant was guided by Government restrictions and recommendations during the non-statutory consultation period.</p>	Noted
113	Executive Summary	<p>Typographic error on page 6 of the Executive Summary. Date range of phase three consultation given as "24 February 2022 – 27 April 202". A "2" is missing from the year "2022".</p> <p>The Executive Summary appears to give a good overview of the project, why it is necessary and some key data from the Applicant's consultation efforts. There are several references to yet unallocated chapters/figures/tables which should help to give further clarity in the final submission but at this time cannot be commented on.</p> <p>The restrictions dealt with during phase one non-statutory consultation should be explained, particularly where it prevented face-to-face events. The COVID-19 Pandemic and subsequent difficulties with consultation does not appear to have been mentioned in the Executive Summary.</p>	<p>The comments are noted and have been addressed in the revised Executive Summary, including that the Applicant has been required to undertake statutory and non-statutory consultation and engagement in accordance with national restrictions and guidance relevant at the time. The following guidance regarding consultation during COVID-19 restrictions was followed:</p> <p>The Planning Inspectorate updated Advice Note 14: Compiling the Consultation Report ('Advice Note 14').</p> <p>The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 as amended in December 2020.</p>
114	Structure and Content Para 4.1.1 Para 4.2.8 & 9.2.4	<p>During previous project update meetings, the Applicant has highlighted what they call "negligible odour" and explained how they planned to communicate and clarify what classes as "negligible odour" to the local community. While the Consultation Report does mention odour being raised as a concern during consultation, the Consultation Report does not appear to make any reference to this having happened, or how "negligible odour" is classified and communicated to the local community.</p> <p>"between 25 June 2020 and the start of non-statutory community consultation on 08 July". For clarity to the reader and to avoid any doubt, the year non-statutory community consultation started on 08 July should be included.</p> <p>The use of statistics is useful in giving a thematic overview of the feedback received during statutory consultation and highlighting.</p>	<p>The Applicant notes the comments and has made amendments to the structure and content. Regarding communicating 'negligible' odour levels, the Applicant has added reference to the Odour Modelling undertaken and also has added details of an Odour Site Visit to the existing Milton works to explain with reference to the existing site, odour levels that have been modelled for the new facility.</p> <p>The comments on statistics are noted and continued throughout.</p>

115	Distinction between non-stat and stat consultation	<p>There is a clear distinction regarding the activities carried out by the Applicant in both non-statutory and statutory consultation. Section 42 consultees were given between 24 February 2022 and 27 April 2022 (63 days) to engage in the consultation which exceeds the 28-day minimum requirement.</p> <p>Non-statutory consultation provided 68 days for responses between 08 July 2022 and 14 September 2020.</p> <p>It is clear within the Consultation Report that face-to-face consultation was unable to be conducted (for non-statutory consultation) due to the COVID-19 pandemic and has clearly detailed the materials (such as a digital engagement platform and digital webinars). Supporting tables and appendices are yet to be populated.</p> <p>Section 9.3 "Ongoing non-statutory consultation" still to be populated.</p>	The comments are noted and the Ongoing Community Involvement and ongoing engagement with Technical Stakeholders has been populated and is now in Section 11.
116	General	The Community Consultation Timeline on page 9 should be less pixelated.	The comments are noted and this has been rectified in the final version of the Consultation Report.
117	General	Typographic error on page 28 – repetition of 'facility'.	The comments are noted and this has been rectified in the final version of the Consultation Report.
118	Para 5.4.1	<p>Paragraph 5.4.1 states that 'The local authorities consulted by the Applicant on the SoCC are listed in Table 7.1.'</p> <p>Table 7.1 of the report lists the Community Access Points for statutory consultation.</p> <p>Should Paragraph 5.4.1 instead refer to Table 7.2?</p>	The comments are noted and this has been rectified in the final version of the Consultation Report. Paragraph 7.4.1 now refers to Table 71 on page 73 labelled Section 42 Local Authorities Consulted under section 42 (1) (b) of the 2008 Act.
119	Table 7.3	Part of the comment on the draft SoCC by Greater Cambridgeshire Shared Planning Service is repeated – see paragraph starting 'Community Working Groups plural...'	The comments are noted and this has been rectified in the final version of the Consultation Report.

Flood Risk Assessment			
Ref No.	Article, Requirement or Schedule	Planning Inspectorate Comment/Question	The Applicant Comment/Amendment
120	Section 5	The flood risk assessment contains limited detail on the residual flood risks / changes to flooding associated with the decommissioning of the existing waste water treatment plant (to the extent that these may be a consequence of the Proposed Development).	The comment is noted and as a result the amendment has been made in FRA report to clarify that the risk associated with existing Cambridge WWTP remains unchanged from the present level of risk.
121	Section 5	The flood risk during construction section does not describe (if any) potential flood risks to / from the Proposed Development during the period of overlap between the commissioning of the new facility and the phasing out of the existing facility (and / or the duration of this).	The comment is noted and as a result amendments have been made to the final report.
122	Sections 2, 6.5 and 7	The Inspectorate has not reviewed or commented on the drainage strategy. However, it is noted that it will form an appendix to the FRA. What is unclear is the extent to which this will be provided in detail at the application stage, such that the SoS can have confidence in the FRA mitigation measures that are said to be secured and delivered as part of the drainage strategy. There is also reference to "an operational management plan for flood risk" and it is assumed that this will be provided, at least in outline, as part of the application documents so as to understand the measures that it will contain and the governance / approval process for it being reviewed (and / or updated) periodically.	The FRA will be updated to align with the Drainage Strategy and measures within this to avoid or reduce flood risk from surface water (including emergent groundwater should this occur). The detailed drainage design and any adaptive management measures related to it will be subject to agreement with the LLFA. The Drainage Strategy will set out a schedule for those items that require approval post consent and which of these items will deliver specific mitigation. Copies of the Drainage Strategy and FRA have been shared with the LLFA and Internal Drainage Boards and in a meeting of 9th December 2022 they have confirmed they are acceptable.

Get in touch

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<https://infrastructure.planninginspectorate.gov.uk/projects/eastern/cambridge-waste-water-treatment-plant-relocation/>