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Table 1-1: National Policy Statement for Waste Water

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3	**FACTORS FOR EXAMINATION AND DETERMINATION OF APPLICATIONS**	
3.2.1 **(Environmental impact assessment)**	All proposals for projects that are subject to the European Environmental Impact Assessment Directive must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project. The Directive specifically refers to effects on human beings, fauna and flora, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them. The Directive requires a description of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects. When considering a proposal, the examining authority and the decision maker should ensure that likely significant effects at all stages of the project have been adequately assessed, and should request further information where necessary.	An Environmental Impact Assessment has been undertaken in respect of the Proposed Development. The Environmental Statement (ES) reports the assessments and potential impacts arising from the project and is found at Volume 5 of this DCO application. Chapters 6-20 of the ES assess the likely significant effects arising from the Proposed Development in relation to the key environmental topics listed in paragraph 3.2.1 of the NPSWW, and Chapter 21 of the ES (App. Doc. Ref 5.2.21) assesses the cumulative impact of the effects resulting from impacts of the Proposed Development acting together with an impact or impacts associated with other proposed development schemes on a single receptor. An EIA Scoping Opinion Request was submitted by the Applicant to the Planning Inspectorate (the Inspectorate) on 19th October 2021. Subsequently, the Inspectorate published its Scoping Opinion on 29th November 2021. This set out its opinion on the methodologies and scope of the assessments to be undertaken in the EIA. The Applicant has

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		taken into account the opinion provided by the Inspectorate when undertaking the EIA in order to ensure that all likely significant effects have been adequately assessed.
3.2.2	To consider the potential effects, including benefits of a proposal for a project, the examining authority and the decision maker will find it helpful if the applicant also sets out information on the likely significant social and economic effects of the development, and shows how any likely significant negative effects would be avoided or mitigated. This information could include matters such as employment, equality, community cohesion and well-being.	Chapters 11: Community (App Doc Ref 5.2.11) and 12: Health (App. Doc. Ref 5.2.12) set out the potential social and economic effects of the Proposed Development, and present the mitigation measures proposed to avoid and minimise significant negative effects. The assessments consider effects on factors including employment, equality, community cohesion and wellbeing, having been informed by guidance from National Highways' Design Manual for Roads and Bridges (DMRB), Public Health England's Health Impact Assessment in spatial planning – 'A guide for local authority public health and planning teams', the Institute of Environmental Management and Assessment's (IEMA) 'Health in Environmental Impact Assessment; A Primer for a Proportionate Approach', South Cambridgeshire Supplementary Planning Document for Health Impact Assessment (South Cambridgeshire District Council, 2011 and The Mental Wellbeing Impact Assessment: A Toolkit. A separate Equalities Impact Assessment (EqIA) (App. Doc. Ref7.12) assesses the proposed development in respect of the Applicant's obligation under UK equality legislation,

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		including the Equality Act 2010, and in particular the Public Sector Equality Duty (PSED), which encourages organisations delivering public functions, such as the Applicant, to understand how different people will be affected by their activities. The assessments conclude that during construction and operation, the effects arising from the Proposed Development will not be significant. The Applicant has also prepared a Landscape, Ecological and Recreational Management Plan (LERMP) in respect of the Proposed Development which is key in the delivery of landscape enhancement, visual screening, ecological habitat creation and recreational opportunities for local communities. In addition to the socio-environmental opportunities that are proposed as part of the Proposed Development through the delivery of measures set out in deliverables such as the LERMP, there are a number of socio-economic benefits which stem directly from the need for the scheme. These socio-economic benefits that would be delivered from the grant of development consent for the Proposed Development interlink with the relocation of the existing WWTP and release of land. This would allow for the

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		creation of the new city district and will provide for double the density of space and jobs at adjacent high-value employment sites such as Cambridge Science Park and allow the provision of significant new infrastructure to be delivered including investment in utilities, transport, green space, public realm, health facilities, schools and affordable housing. Please refer to Chapter 2 of the Planning Statement (App. Doc. Ref 7.5) accompanying this DCO Application for further information.
3.2.3-3.2.4	When considering cumulative effects, the ES should provide information on how the effects of the applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been sought or granted, as well as those already in existence). The examining authority and the decision maker may also have other evidence before it, for example from appraisals of sustainability of relevant NPSs or development plans, on such effects and potential interactions. Any such information may assist the decision maker in reaching decisions on proposals and in assessing the mitigation measures that have been proposed by the applicant or considered in the examination. The examining authority and the decision maker should consider how the accumulation of, and	Chapter 21 Cumulative Effects of the ES (App. Doc. Ref 5.2.21) presents the Applicant's assessment of cumulative effects arising from the Proposed Development. It considers the combined effects from the assessments set out in Chapter 6-20 of the ES. The assessment considers the effects from impacts of the Proposed Development acting together with an impact or impacts associated with other Proposed Development schemes on a single receptor. This can be two similar impacts acting on a single receptor (such as increases in noise levels as a result of the Proposed Development and another development), or two different impacts acting on a single receptor (such as an increase in noise levels from the Scheme and an increase in air quality emissions from another development). The Applicant has also considered the demolition of structures and site

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	interrelationship between, effects might affect the environment, economy or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.	preparation of the existing Cambridge WWTP as part of the cumulative effects assessment. It also assesses the future decommissioning activities at the existing WWTP that will be required to the extent that they are reasonably foreseeable to facilitate any future development that will be subject to a separate planning permission. The assessment concludes that in considering the potential for cumulative effects from other developments within 2km of the Order Limits, in combination with the Proposed Development, no significant cumulative effects have been identified. The exception to this is the beneficial multiplier socio-economic effects associated with the relocation of the existing Cambridge WWTP. Furthermore, the assessment also considers inter-related effects as a result of the construction and operation of the Proposed Development. It concludes that there would be no significant inter-related effects during either construction or operation of the Proposed Development.
3.2.5	To help the examining authority and the decision maker consider thoroughly the potential effects of a proposed project in cases where the EIA Directive does not apply, and an ES is not therefore required, the applicant should instead provide information proportionate to	The Applicant has undertaken EIA Screening which confirms that an EIA is required in respect of the Proposed Development and therefore this policy is not applicable.

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	the scale of the project on the likely significant environmental, social and economic effects. References to an ES in this NPS should be taken as including a statement which provides this information, even if the EIA Directive does not apply. In this NPS, the terms 'effects', 'impacts' or 'benefits' should be understood to mean likely significant effects, impacts or benefits.	
3.2.6 **(Flexibility in project proposals)**	In some instances it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case.	The design of the Proposed Development included within the DCO application submission is a 'preliminary design' which therefore may be subject to some design refinement following approval of the DCO, subject to the Requirements which are set out in Schedule 2 of the draft DCO. The Applicant recognises that it is standard for NSIPs particularly of this nature, to need to ensure that there is a reasonable degree of flexibility to make minor design changes as the design of the Proposed Development progresses. The draft DCO provides the limits of deviation, both laterally and vertically. These limits allow for flexibility in the proposals where necessary, yet ensuring these would be proportionate changes which can be made in order to facilitate the design and construction of the Proposed Development. In considering the need to include flexibility in the design proposals, the technical reports and

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		assessments undertaken have been taken into consideration. Chapter 5 EIA Methodology of the ES (App. Doc. Ref 5.2.5) sets out the methodology used in order to undertake the EIA. This chapter sets out the parameters for which the EIA covers in relation to what has been assessed within the scope of the EIA. The limits of deviation will not extend beyond the areas included within the EIA assessment.
3.2.7	Where some details are still to be finalised the ES should set out, to the best of the applicant's knowledge, what the maximum extent of the proposed development may be in terms of site and plant specifications, and assess, on that basis, the effects which the project could have to ensure that the impacts of the project as it may be constructed have been properly assessed.	Chapter 5 EIA Methodology of the ES (App. Doc. Ref 5.2.5) sets out how The Applicant has applied the Rochdale Envelope to the Proposed Development, in line with the Inspectorate's Advice Note Nine: Rochdale Envelope. This has been used to inform the technical assessments and therefore the maximum design parameters included within the draft DCO. This provides confidence that the EIA process robustly considers the likely worst-case impact of the Proposed Development in respect of the technical assessments set out in Chapters 6-20 of the ES, whilst also taking account of the need to include limits of deviation to allow for the flexibility required in the design.
3.2.8	Should the decision maker determine to grant development consent for an application where details are still to be finalised, it will need to reflect this in appropriate development consent requirements. Clearly, if development consent is granted for a	The Applicant recognises that it is standard for NSIPs particularly of this nature, to need to ensure that there is a reasonable degree of flexibility in the to make minor design changes as the design of the Proposed Development progresses, particularly where in respect of proposals such

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	proposal and at a later stage the developer wishes for technical or commercial reasons to construct it in such a way that its extent will be greater than has been provided for in the terms of the consent, it may be necessary to apply for a change to be made to the development consent, and the application to change the consent may need to be accompanied by further environmental information to supplement the original ES.	as this, construction of certain elements may be several years after the DCO application has been granted. As such, the draft DCO provides the limits of deviation, both laterally and vertically. The limits included allow for flexibility in the scheme where necessary, yet ensuring these would be proportionate changes can be made in order to facilitate the design and construction of the Proposed Development in the future. Therefore, there should not be the need to apply for a change to be made to the development consent where further supplementary environmental information would be required. Chapter 5 EIA Methodology of the ES (App. Doc. Ref 5.2.5) sets out the methodology used in order to undertake the EIA. This chapter sets out the parameters for which the EIA covers in relation to what has been assessed within the scope of the EIA. The limits of deviation will not extend beyond the areas included within the EIA assessment.
3.3.1 **(Habitats regulations assessment)**	Prior to granting a development consent order, the decision maker must, under the Habitats and Species Regulations, consider whether the project may have a significant effect on a European site, or on any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans or projects. Further information on the requirements	The Applicant has prepared a Habitats Regulations Assessment (HRA) Report in respect of the Proposed Development which is found at Appendix 8.16 of the ES Appendices (App. Doc. Ref 5.4.8.16). This assessment concludes that with the mitigation measures proposed, including regulatory requirements, the

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	of the Habitats Regulations can be found in a Government Circular. Applicants should also refer to section 4.5 on biodiversity and geological conservation. The applicant should seek the advice of Natural England and/or the Countryside Council for Wales, and provide the examining authority with such information as it may reasonably require to determine whether an appropriate assessment is required. In the event that appropriate assessment is required, the applicant must provide such information as may reasonably be required to enable the examining authority to conduct the appropriate assessment. This should include information on any mitigation measures that are proposed to minimise or avoid likely effects.	construction and operational activities associated with the Proposed Development will not have any significant adverse effects on the overall integrity of the European sites and their features either alone or in-combination with other plans, policies or projects.
3.4.3 **(Alternatives)**	The Environmental Statement (ES) should include an outline of the main alternatives studied by the applicant and an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects.	The Proposed Development has undergone an extensive optioneering process to establish the preferred option to take forward through the DCO application submission. Chapter 3 Site Selection and Alternatives of the ES (App. Doc. Ref 5.2.3) sets out the main alternatives considered by The Applicant and how the preferred option was determined through considering the environmental, planning, construction and operational impacts and, in the final stages, economic and programme criteria, in addition to looking at reasonable alternatives relating to design, technology, location, size, scale and construction.

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		The Statement of Requirements (App. Doc. Ref 7.2), Site Selection Non-Technical Summary (App. Doc. Ref 7.3) and the Design & Access Statement (App. Doc. Ref 7.6) provide added detail on the alternatives.
3.5.2 **(Criteria for "good design" for waste water infrastructure)**	The decision maker needs to be satisfied that waste water infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable and adaptable (including taking account of natural hazards such as flooding) as they can be. In so doing, the decision maker should satisfy itself that the applicant has taken into account both aesthetics and functionality (including fitness for purpose). Applicants and the examining authority should consider taking independent professional advice on the design aspects of a proposal. In particular, Design Council CABE can be asked to provide design review for nationally significant schemes and applicants are encouraged to use this service.	Chapter 2 Project Description (App. Doc. Ref 5.2.2) describes the design, mitigation measures and enhancement measures proposed in respect of the Proposed Development. The Design & Access Statement (App. Doc. Ref 7.6) describes how the Proposed Development has been subject to an extensive design development process, which has taken into consideration regulatory and environmental constraints. It explains how the design of the proposed CWWTP has been developed to meet the required functionality of infrastructure development of this nature. It describes the aspirational approach taken to the design of the proposed WWTP which exemplifies the scheme as an NSIP, incorporating novel technologies which help reduce the footprint of the proposed WWTP to 22ha, about half the size of the existing WWTP. This leaves the remainder of the site for landscapes areas, environmental mitigation and enhancements to screen the proposed WWTP and, for recreation, to produce a scheme which is innovative and which promotes a high level of sustainability within the context of the NPSWW.

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		Chapter 15 Landscape and Visual Amenity (App. Doc. Ref 5.2.15) sets out proposed mitigation measures based on the assessment and analysis of landscape and visual constraints. Chapter 20 Water Resources (App. Doc. Ref 5.2.20) contains the proposed mitigation measures in relation to the water environment and a Flood Risk Assessment (App. Doc. Ref. 5.4.20.1) has also been undertaken to demonstrate how the design of the Proposed Development does not have any adverse significant effects in respect of flood risk. The DCO deliverables set out above provide evidence to the Inspectorate and Secretary of State that the Proposed Development has been designed so far as reasonably practicable to firstly avoid, and in the second instance, to minimise any negative effects on the environment and community.
3.5.3	The development should, by the use of good architecture and appropriate landscaping, be as visually attractive as possible. While the applicant may have no, or very limited choice in the physical appearance of some waste water infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing and	The DAS (App. Doc. Ref. 7.6) describes the aspirational approach taken to the design of the proposed WWTP which exemplifies the scheme as an NSIP incorporating novel technologies which help reduce the footprint of the proposed WWTP to 22 ha, about half the size of the existing WWTP. This leaves the remainder of the site for landscaped areas, environmental mitigation and enhancements to screen the proposed WWTP and for

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	currently planned landscape character, landform and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as control rooms and pumping stations will assist in ensuring that such development contributes to the quality of the area.	recreation to produce a scheme which is innovative and which promotes a high level of sustainability within the national policy context as set out in the sections on 'good design' in the NPSWW (including section 3.5 and paragraphs 4.5.14, 4.8.19, 4.9.8 and 4.9.12). The Design and Access Statement (DAS) (Application Document Ref 7.6) describes the project objectives, design principles and considerations that have informed the design and appearance of the Proposed Development. It provides details of the design that are proposed to be reserved by the DCO requirements including the design and external appearance of plant and buildings, materials and landscape planting. Illustrative material is included in the document to help articulate what may be built, in terms of visual appearance, scale and massive, noting that the precise details may vary at the point that approval is requested to discharge the relevant DCO requirements. The Proposed Development has been designed whilst adhering to a set of eight principles (found at section 2.4 of the DAS) which define how the scheme will fulfil the criteria of 'good design', consistent with the NPSWW. These principles have informed the design requirements; that is, designs for the components of the Proposed Development (such as the buildings, principal structures

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		and landscape). The DAS provides detail of how the design principles and requirements have informed both the landscape and architectural design at a site-wide scales, in response to the site context and the likely way that the Proposed Development will continue to be developed though the detailed design process in accordance with the design requirements and site parameter plans.
3.5.4	Applicants should set out the main alternatives to the design that they have considered and the reasons why the favoured choice has been selected, demonstrating that all proposed and alternative infrastructure meets the relevant EU or UK technical standard for design, construction, installation and maintenance, where such standards exist; and where they do not, that these components of design are fully explained by the applicant. In considering applications the examining authority and the decision maker should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements which the design has to satisfy.	The Proposed Development has considered the guidance set out in the NPSWW and the Proposed Development has undergone an extensive optioneering process to establish the preferred option to take forward through the DCO application submission. Chapter 3 Site Selection and Alternatives of the ES (App. Doc. Ref. 5.2.3) sets out the main alternatives considered by the Applicant and portrays how the preferred option was determined through considering the environmental, planning, construction and operational impacts and, in the final stages, economic and programme criteria, in addition to looking at reasonable alternatives relating to design, technology, location, size, scale and construction. The Statement of Requirements (App. Doc. Ref. 7.3) also formed an important part in the optioneering process. This document sets out Anglian Water's requirements for a new waste water treatment plant from a technical, process and

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		operational perspective to inform the site selection process. The DAS (Application Document Ref 7.6) describes the project objectives, design principles and considerations that have informed the design and appearance of the Proposed Development.
3.6.6 **(Climate Change Adaptation)**	New infrastructure will typically be long-term investments which will need to remain operational over many decades, in the face of a changing climate. Consequently applicants must consider the impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new waste water infrastructure. The ES should set out how the proposal will take account of the projected impacts of climate change. While not required by the EIA Directive, this information will be needed by the examining authority and the decision maker.	As a principle, The Applicant is committed to delivering a modern, low carbon waste water treatment plant which forms part of Anglian Water's commitment to reach net zero carbon emissions by 2030. Chapter 9 Climate Resilience and Chapter 10 Carbon of the ES (App. Doc. Ref.s 5.2.9 and 5.2.10) set out The Applicant's assessment of the potential impacts of the Proposed Development in relation to climate change and carbon during construction, operation and decommissioning phases of the project. The climate impact assessment included in Chapter 9 Climate Resilience (App. Doc. Ref. 5.2.9) considers the effects and impacts of climate change into the 2090s (2080-2099), which is the furthest time period for which climate modelling has been conducted. The mitigations identified and residual risks take into account mitigations that are embedded into the Proposed Development, as

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		well as additional future mitigation (such as ongoing maintenance, renewals and upgrades) that will take place throughout the operational lifetime of the Proposed Development and which will take climate change into account.
3.6.7	Applicants should use the latest set of UK Climate Projections to ensure they have identified appropriate adaptation measures. Applicants should apply as a minimum, the emissions scenario that the Independent Committee on Climate Change suggests the world is currently most closely following – and the 10%, 50% and 90% estimate ranges. These results should be considered alongside relevant research which is based on the climate change projections.	The assessment in relation to climate resilience set out in Chapter 9 Climate Resilience (App. Doc. Ref. 5.2.9) has used the latest UK climate projections (UKCP18) to inform it, considering RCP8.5 highest emissions scenario for the East of England. It has considered the 50% value for average climate variables (such as increase change in average temperature) as well as the 10% and 90% values to show the range of projected change.
3.6.8	The decision maker should be satisfied that the proposals have taken into account the potential impacts of climate change using the latest UK Climate Projections available at the time the ES was prepared and have identified appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure. Should a new set of UK Climate Projections become available after the preparation of the ES, the examining authority should consider whether they need to request further information from the applicant.	The assessment in relation to climate resilience set out in Chapter 9 Climate Resilience (App. Doc. Ref. 5.2.9) has used the latest UK climate projections (UKCP18), considering RCP8.5 highest emissions scenario for the East of England. Impacts of climate change to the 2090s (2080-2099) are the furthest future time period for which climate projections are available and which are expected to cover the first approximately 60 years of the operational lifetime of the Proposed Development. The Proposed Development currently has no specified end-of-life and is therefore expected to continue to operate into the 2090s and

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		beyond. During this time routine maintenance, renewals and upgrades to equipment and processes are expected. Some of these activities are included as mitigations to the future impacts of climate change. The Statement of Requirement (App. Doc. Ref. 7.2) includes requirements for the review of new UK Climate Projections as they become available during the operation phase and at appropriate occasions such as when renewing the specifications for equipment renewal or upgrade. Schedule 2 of the draft DCO (App. Doc. Ref. 2.1) includes requirements for the review of climate change risks and identification of additional mitigation measures required as appropriate to ensure that the WWTP continues to operate safely and effectively.
3.6.10	The decision maker should be satisfied that there are not critical features of the design of new waste water infrastructure which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections, taking account of the latest credible scientific evidence on, for example, sea level rise (e.g. by referring to additional maximum credible scenarios – i.e. from the Intergovernmental Panel on Climate Change or the Environment Agency) and that necessary action can be	The site of the proposed WWTP is considered appropriate for the long-term (to beyond 2080) under a spectrum of future climate change scenarios. There are areas allowed for within the earth bank proposed to facilitate enhancements of these assets, all of which would be within the limits of deviation included within the DCO.

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	taken to ensure the operation of the infrastructure over its estimated lifetime.	
3.6.11-3.6.13	Any adaptation measures should be based on the latest set of UK Climate Projections, the Government's latest national Climate Change Risk Assessment, when available and in consultation with the appropriate statutory consultees. Adaptation measures can be required to be implemented at the time of construction where necessary and appropriate to do so. Where an applicant has identified adaptation measures necessary to deal with the impact of climate change, and those measures would have an adverse effect on other aspects of the project and/or surrounding environment (e.g. coastal processes), the decision maker may consider requiring the applicant to ensure that the adaptation measures could be implemented should the need arise, rather than at the outset of the development (e.g. reserving land for future extension, increasing height of existing, or requiring new, sea wall).	The assessment in relation to climate resilience set out in Chapter 9 Climate Resilience (App. Doc. Ref. 5.2.9) has used the latest UK climate projections (UKCP18), considering RCP8.5 highest emissions scenario for the East of England. It has also been informed by the findings of the second UK Climate Change Risk Assessment published by the Department for Environment, Food & Rural Affairs in 2017. The scope of the assessment was agreed with The Inspectorate, and has since been informed by statutory and non-statutory consultees. Although there were no specific climate resilience-related Technical Working Groups (TWGs) conducted, the impacts of climate change on future storm flows and discharge to the River Cam was discussed as part of bilateral consultation and technical working groups conducted as part of the water resources assessment, as outlined in Chapter 20: Water Resources (App. Doc. Ref. 5.2.20). Adaptation measures have been allowed for through allowing flexibility and capacity within the design of the Proposed Development. The flexibility allows for potential changes within the treatment process of the proposed WWTP to deal with future influent flow rates under future heavy rain gall and drought conditions. The flexibility also

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		includes capacity for adaptation and change within the Proposed Development, allowing the design to be modified in the future to provide additional climate resilience in response to higher temperatures, changing storm flows or drought conditions that require additional treatment to meet the Environmental Permit required to secure these measures. A Drainage Strategy (App. Doc. Ref. 5.4.20.12) has also been prepared in respect of the Proposed Development, which dictates that all surface water drainage design is to be based on a 1:100-year storm event +40% allowance for climate change. This climate change allowance is in line with Environment Agency guidance. Further details on adaptation measures are set out in Chapter 9 Climate Resilience of the ES (App. Doc. Ref. 5.2.9).
3.7.5 **(Pollution control and other environmental consenting regimes)**	Applicants should consult the Marine Management Organisation (MMO) on nationally significant projects which would affect, or would be likely to affect, any relevant marine areas as defined in the Planning Act 2008 (as amended by s.23 of the Marine and Coastal Access Act 2009). The decision maker's consent may include a deemed marine licence and the MMO will advise on what conditions should apply to the deemed	The Proposed Development will not affect any relevant marine areas as defined in the Planning Act 2008 (as amended by s. 23 of the Marine and Coastal Access Act 2009) and therefore consultation with the MMO was not required in accordance with Section 12(1)(aa) of the PA 2008.

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	marine licence. The examining authority and MMO should cooperate closely to ensure that nationally significant infrastructure projects are licensed in accordance with environmental legislation, including European directives.	
3.7.6	The projects covered by this NPS may be subject to the Environmental Permitting (EP) regime, which also incorporates operational waste management requirements for certain activities. When a developer applies for an Environmental Permit, the relevant regulator (usually the Environment Agency, but sometimes the local authority) requires that the application demonstrates that processes are in place to meet all relevant EP requirements. In considering the impacts of the project as part of their examination, the examining authority may wish to consider with the regulator any management plans that would be included in an Environmental Permit application.	The Consents and other permits register (App. Doc. Ref. 7.1) sets out the other permits, consents, licences and agreements required to be attained by the Applicant in respect of the Proposed Development separately to the DCO.
3.7.7	Applicants are advised to make early contact with relevant regulators, including the Environment Agency and the MMO, to discuss their requirements for environmental permits and other consents. This will help ensure that applications take account of all relevant environmental considerations and that the relevant regulators are able to provide timely advice	The Applicant has engaged with the Environment Agency throughout the preparation of the DCO application on a number of matters, including the requirement of any environmental permits. Details of additional consent requirements for the Proposed Development are included in the Consents and other permits register (App. Doc. Ref. 7.1).

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	and assurance to the examining authority. Wherever possible, applicants are encouraged to submit applications for Environmental Permits and other necessary consents at the same time as applying to the examining authority for development consent.	
3.7.8	The examining authority and decision maker should be satisfied that development consent can be granted taking full account of environmental impacts. This will require close cooperation with the Environment Agency (EA) and/or the pollution control authority, and other relevant bodies, such as the MMO, Natural England, Drainage Boards, and water and sewerage undertakers, to ensure that in the case of potentially polluting developments: • the relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework • the effects of existing sources of pollution in and around the site are not such that the cumulative effects of pollution when the proposed development is added would make that development unacceptable, particularly in relation to statutory environmental quality limits.	Regular liaison has been undertaken by The Applicant with the relevant statutory bodies, notably the Environment Agency, Natural England and the Internal Drainage Board. Discharges to the receiving water environment from this type of project are regulated by the Environment Agency as is the operation of both the existing and the proposed WWTP. The design of the Proposed Development has been guided by the consultation with relevant bodies to ensure that it is acceptable in terms of adhering to statutory environmental quality limits, when considering the existing sources of pollution in-combination with the development proposals.

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3.8.1 – 3.8.2 **(Safety)**	Applicants should consult with the Health and Safety Executive (HSE) on matters relating to safety. HSE is responsible for enforcing a range of health and safety legislation applying to the construction, operation and decommissioning of waste water infrastructure. The decision maker will need to be satisfied that there is no reason to expect that the project will not comply. Some waste water infrastructure may be subject to the Control of Major Accident Hazards (COMAH) Regulations 1999. These are enforced by HSE and the Environment Agency in England and Wales. The same principles apply here as for those set out in the previous section on Pollution Control and other Environmental Permitting Regimes.	The Applicant has consulted with the Health and Safety Executive (HSE) in respect of the application and will continue to consult with the HSE on the construction, operation and decommissioning of the proposed WWTP in relation to health and safety matters. The Proposed Development does not meet criteria for a COMAH site and it should be noted that the Proposed Development does not fall within the scope of EU legislation 2012/18/EU (control of major-accident hazards involving dangerous substances). The Applicant will, however, continue to consult with the HSE on its proposed construction, operation and decommissioning activities.
3.9.1 – 3.9.3 **(Hazardous substances)**	All establishments wishing to hold stocks of certain hazardous substances, above a threshold quantity need hazardous substances consent. Applicants should consult the HSE at preapplication stage if the project is likely to need hazardous substances consent. Where hazardous substances consent is applied for, the decision maker will consider whether to make an order directing that hazardous substances consent shall be deemed to be granted alongside making an order granting development consent. The decision maker should consult HSE about this.	The predicted hazardous substances volumes are below threshold levels and therefore the Applicant has not been required to consult with the HSE at the pre-application stage of the project in relation to obtaining a hazardous substances consent in respect of the Proposed Development.

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	HSE sets a consultation distance around every site with hazardous substances consent and notifies the relevant local planning authorities. Whenever a waste water development is proposed within any consultation distance, the applicant should consult the HSE for its advice on locating the particular development there.	
3.10.1-3.10.5 **(Health)**	Waste water management has the potential to affect the health and well-being of the population. Adequate provision of waste water infrastructure is clearly beneficial to society and to our health as a whole. However, the possibility of some adverse effects cannot be discounted. The direct impacts on health may include increased traffic, air pollution, dust, polluting water (toxicity and disease risks), hazardous waste and substances, noise, and increases in pests. New waste water infrastructure may also have indirect health impacts, for example if it in some positive or negative way affects access to key public services, employment, transport or use of open space and water for recreation and physical activity. These impacts may affect people simultaneously, so the applicant, the examining authority and the decision maker should consider the cumulative impact on	An assessment of the effects of the Proposed Development on health and well-being has been undertaken, the conclusions of which are contained in Chapter 12 Health of the ES (Application Document Ref 5.2.12). The assessment considers the potential impacts and the health outcomes resulting from impacts related to matters including those listed below: - Air quality - Community - Land quality - Landscape and visual amenity - Material resources and waste - Noise and vibration - Odour - Traffic and transport - Water

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	health. The applicant should identify any significant adverse health impacts in the ES, and identify measures to avoid, reduce or compensate for these impacts as appropriate.	The Applicant has applied guidance set out in the institute of Environmental Management and Assessment (IEMA) 'Health in Environmental Impact Assessment; A Primer for a Proportionate Approach' to the assessment methodology included in Chapter 12 Health of the ES (App. Doc. Ref. 5.2.12). The effects of the Proposed Development on health during construction, operation and decommissioning would vary from neutral to slight adverse prior to mitigation, which is not significant. These include: - Slight adverse effects in relation to changes to how local people feel about their community, in particular their sense of place and wellbeing. - Slight beneficial effects in relation to changes in access to recreational areas impacting rates of physical activity and the ability to live active lifestyles within the area included in the scope of the assessment. Further details including mitigation measures proposed are set out in Chapter 12 Health of the ES (App. Doc. Ref. 5.2.12).
3.11.2 – 3.11.3 **(Common law nuisance and**	It is very important that, at the application stage of an NSIP, possible sources of nuisance under section 79(1) of the 1990 Act and how they may be mitigated or	The Applicant has prepared a Statutory Nuisance Statement (App. Doc. Ref. 7.13) in respect of the Proposed Development. It considers the embedded and essential

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statutory nuisance)	limited are set out by the applicant and considered by the examining authority so that appropriate requirements can be included in any subsequent order granting development consent. The decision maker should note that the defence of statutory authority is subject to any contrary provision made by the decision maker in any particular case in a development consent order (section 158(3)). Therefore, subject to paragraph 3.11.1, the decision maker can disapply the defence of statutory authority, in whole or in part, in any particular case, but in doing so should have regard to whether any particular nuisance is an inevitable consequence of the development.	mitigation measures proposed in the application in relation to 'statutory nuisances' which include: - Emissions (including air quality and odour) - Artificial lighting - Noise - Insect infestation The assessment concludes that construction, operation, use and maintenance of the Proposed Development would not give rise to impacts which would be likely to constitute a statutory nuisance as defined by the Environmental Protection Act 1990.
3.12.2- 3.12.3 **(Security Considerations)**	Government policy is to ensure that, where possible, proportionate protective security measures are designed into new infrastructure projects at an early stage in the project development. Where applications for development consent for infrastructure covered by this NPS relate to potentially 'critical' infrastructure, there may be national security considerations. Defra should be notified by the developer at pre-application stage about likely future applications for nationally significant infrastructure projects, so that any national security implications can be identified. Where national security implications have been identified, the	No national security implications have been identified for the Proposed Development, as the Proposed Development is not a water supply installation and is not, therefore, the most vulnerable infrastructure.. However, the design of the Proposed Development incorporates appropriate fencing, security and surveillance requirements. The design also includes appropriate information and communications technology (ICT) security. This is set out in more detail in the DAS (App. Doc. Ref. 7.6).

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	applicant should consult with relevant security experts from CPNI and Defra to ensure that physical, procedural and personnel security measures have been adequately considered in the design process and that adequate consideration has been given to the management of security risks. If CPNI and Defra are satisfied security issues have been adequately addressed in the project when the application is submitted, they will provide confirmation of this to the examining authority and they should then not need to give any further consideration to the details of the security measures in its examination.	
3.12.4-3.12.5	The applicant should only include sufficient information in the application as is necessary to enable the examining authority to examine the development consent issues and for the decision maker to make a properly informed decision on the application. In exceptional cases, where examination of an application would involve public disclosure of information about defence or national security which would not be in the national interest, the Secretary of State can intervene and examine a part or the whole of the application. In that case, the Secretary of State may	No national security implications have been identified for the Proposed Development. However, the design of the Proposed Development incorporates appropriate fencing, security and surveillance requirements. The design also includes appropriate information and communications technology (ICT) security.

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	appoint an examiner to consider evidence in closed session.	
4	**GENERIC IMPACTS**	
4.2.2 – 4.2.3 **(Water Quality and resources)**	Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on water quality, water resources and physical characteristics of the water environment as part of the Environmental Statement (ES) or equivalent. The ES should describe: • the existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges; • existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Catchment Abstraction Management Strategies); • existing physical characteristics of the water environment (including quantity and dynamics	Chapter 20 Water Resources of the ES (App. Doc. Ref. 5.2.20) sets out the Applicant's assessment on the potential effects of the Proposed Development on the water environment. It presents the findings of an assessment into the quality and characteristics of the existing watercourses and waterbodies (surface and groundwater) within the scope of the assessment and identifies any potential effects as a result of the construction, operation and decommissioning of the Proposed Development. A Water Framework Directive (WFD) Assessment has been prepared in respect of the Proposed Development and the findings are contained in the WFD Report (App. Doc. Ref. 5.4.20.3). The assessment follows the three-stage screening/scoping and detailed assessment approach outlined in the Inspectorate's Advice Note Eighteen: The Water Framework Directive. Chapter 20 Water Resources of the ES (App. Doc. Ref. 5.2.20) identifies the main surface water features as the River Cam which is an Environment Agency main river and WFD waterbody, Black Ditch and Quy Water and Bottisham

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	of flow) affected by the proposed project and any impact of physical modifications to these characteristics; • any impacts of the proposed project on water bodies or protected areas under the Water Framework Directive and source protection zones (SPZs) around potable groundwater abstractions; and • any cumulative effects.	Lode, also an Environment Agency main river and WFD waterbody. The main groundwater features include: The West Melbury Marly Chalk Formation, The Woburn Sands Formation and Superficial deposits, mainly associated with the River Cam and other watercourses. An assessment of cumulative effects for water resources has been completed and is reported in Chapter 21 of the ES (App. Doc. Ref. 5.2.21). For water resources, there are no residual cumulative effects. Furthermore, there are no residual inter-related effects for water resources.
4.2.4	The applicant should assess the impact of the proposal on existing abstractions that currently benefit from informal and indirect effluent re-use. The developer should also assess the potential water resources benefits that could arise from changes to effluent discharges as a result of the proposal.	Chapter 20 Water Resources of the ES (App. Doc. Ref. 5.2.20) sets out the Applicant's assessment on the potential effects of the Proposed Development on the water environment. The assessment identifies that there are potential beneficial effects of effluent discharge on water resources in the River Cam.
4.2.5	If the Environment Agency has concerns about the proposal on the grounds of impacts on water quality/resources, the applicant should discuss these concerns with the Environment Agency and take all reasonable steps to agree ways in which the proposal	The Applicant has been actively engaging with the Environment Agency throughout the various stages of the DCO process. This included discussions on consents and permits to be obtained outside the DCO, agreement on methodology and impacts on water quality/resources.

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	might be amended, or additional information provided, which would satisfy the Environment Agency's concerns.	Further details in relation to consents and permits to be obtained outside the DCO are set out in the Consents and Other Permits Register (App. Doc. Ref. 7.1).
4.2.8	The decision maker should be satisfied that a proposal has regard to the River Basin Management Plans and meets the requirements of the Water Framework Directive (including Article 4.7) and its daughter directives, including those on priority substances and groundwater. The specific objectives for particular river basins are set out in River Basin Management Plans. The decision maker should also consider the interactions of the proposed project with other plans such as Water Resources Management Plans and Shoreline/Estuary Management Plans.	The Stage 1 – WFD screening identified the following water bodies as requiring further assessment: - Cam (Surface water body; river); - Cam and Ely Ouse Chalk (Groundwater body); and - Cam and Ely Ouse Woburn Sands (Groundwater body). The WFD Assessment report considers operational WFD compliance risks to these water bodies, as it was agreed with the EA that temporary impacts could be excluded from the assessment. For all three water bodies, the assessment considers there to be no potential adverse WFD effects as a result of the Proposed Development and therefore no further WFD assessment is required. The Proposed Development is therefore considered to meet the requirements of the WFD. Further details can be found in the three summary tables set out in section 5 of the WFD Assessment Report (App. Doc. Ref. 5.4.20.3).

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		The present relevant River Basin Management Plan covers the period from 2015 to 2021 (Cycle 2). The Cycle 3 (2022-2027) draft River Basin Management Plan was issued for consultation in 2021, and at the time of writing is still due to be finalised, which may bring about changes in the baseline status and objectives for water bodies.
4.2.9	The examining authority and the decision maker should consider proposals to mitigate adverse effects on the water environment put forward by the applicant and whether appropriate requirements should be attached to any development consent and/or development consent obligations entered into.	Chapter 20 Water Resources of the ES (App. Doc. Ref. 5.2.20) sets out the Applicant's assessment of the potential effects of the Proposed Development on the water environment. The findings of the assessment are that there are no significant effects on the water environment as a result of the Proposed Development during construction taking into account the implementation of proposed the mitigation measures for surface water and ground water protection outlined in the Code of Construction Practice (App. Doc. Ref.s 5.4.2.1 and 5.4.2.2), with the exception of a few impacts identified in paragraph 5.1.17 of Chapter 20 Water Resources of the ES (App. Doc. Ref. 5.2.20). It is considered that these would have temporary adverse effects.

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		During operation, there would be impacts resulting from changes in final effluent and stormwater discharges which could have a significant beneficial effect on water quality in the River Cam. Mitigation measures are set out in Table 5-2 of Chapter 20 Water Resources of the ES (App. Doc. Ref. 5.2.20). Schedule 2 of the dDCO sets out the requirements relating to the Proposed Development. This secures mitigation measures such as the CEMP, which will contain management plans including those which relate to the water environment, such as a construction water quality management plan. Further details are set out in the dDCO (App. Doc. Ref. 2.1).
4.2.10	The decision maker should consider whether the mitigation measures put forward by the applicant which are needed for operational, construction and decommissioning phases (and which are over and above any which may form part of the project application) are acceptable. A construction management plan may help codify mitigation at that stage.	Mitigation measures in respect of the Proposed Development's impacts on the water environment are set out in Table 5-2 of Chapter 20 Water Resources of the ES (App. Doc. Ref. 5.2.20). A Code of Construction Practice (App. Doc. Ref.s 5.4.2.1 and 5.4.2.2) has been submitted as part of this DCO application and sets out mitigation measures for construction impacts.

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4.3.5-4.3.9 **(Odour)**	All waste water treatment infrastructure projects considered by the examining authority will be subject to an appropriate odour impact assessment submitted as part of an Environmental Statement. The applicant should assess the potential for odour to have a detrimental impact on amenity. The assessment provided by the applicant should include: • a description of the component plant and processes of the development which will give rise to odour; • nature of the odour emissions from the identified sources; • consideration of the prevailing wind conditions; • premises or locations that may be affected by the emissions; • effects of the odour on identified premises or locations; and • measures to be employed to prevent or mitigate odorous emissions. These factors should be examined and assessed by means of a thorough and objective source receptor pathway risk assessment of potential odour impacts.	Chapter 18 Odour of the ES (App. Doc. Ref. 5.2.18) sets out the Applicant's assessment of potential effects in relation to odour as a result of the Proposed Development being constructed, operated and decommissioned. The assessment methodology takes into consideration the comments made by the Inspectorate in its Scoping Opinion published on 29th November 2021, in addition to the guidance set out in the NPSWW. The conclusions of the Odour Impact Assessment are that the likely odour effects at sensitive receptors are negligible and not significant.

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	Odour impacts should be assessed using appropriate odour impact standards that reflect whether the odour source is highly offensive, moderately offensive or less offensive. The odour impact assessment should also include consideration of: • ancillary activities associated with the project, for example, transport of sludge; and • the effects of abnormal operations (e.g. a major plant failure) and emergencies such as loss of sludge disposal route.	
4.3.10	The applicant is advised to consult the local planning authority and, where appropriate, the Environment Agency about the scope and methodology of the assessment.	The Applicant has undertaken engagement with South Cambridgeshire District Council and Cambridge City Council as the host authorities in respect of the Proposed Development, as well as the Environment Agency. This is in respect of the discussing the scope and methodology of the various environmental assessments which are contained in the ES. Details of engagement are included in the Consultation Report (App. Doc. Ref. 6.1).
4.3.16	Mitigation measures may include one of more of the following: • locating the main odour sources away from sensitive developments (such as housing, schools and hospitals, and other sensitive land uses including recreational facilities, commercial premises and open spaces);	The means by which potential odour impacts have been mitigated through design and management are described fully in Chapter 18 Odour of the ES (App. Doc. Ref. 5.2.18).

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	• selection of "low odour" process technologies; • containment or enclosure of the most odorous sources on the site; • where processes are enclosed, ventilation should be provided and vented, at high enough extraction rates to control fugitive leaks, to suitable odour abatement equipment; and • an Odour Management Plan (OMP) documenting the measures to be employed by the site operator to anticipate the formation of odours and to control their release from the site. This should include provision and obligations for suitable monitoring and testing regimes to ensure that controls are properly maintained throughout the life of the development.	
4.4.4 – 4.4.5 **(Flood Risk)**	Applications for projects of 1 hectare or greater in Flood Zone 175, and all proposals for projects located in Flood Zones 2 and 3 in England should be accompanied by a flood risk assessment (FRA). An FRA will also be required where a project less than 1 hectare may be subject to sources of flooding other than rivers and the sea (e.g. surface water), or where the Environment Agency, Internal Drainage Board or other body has indicated that there may be drainage problems. This should identify and assess the risks of all forms of flooding to and from the project and demonstrate how these flood	A Flood Risk Assessment has been carried out in respect of the Proposed Development, in accordance with paragraph 4.4.4 and 4.4.5 of the NPSWW. This assesses the risk to the Proposed Development from all sources of flooding and considers the effects of the Proposed Development to flood risk elsewhere. The proposed WWTP is located entirely within Flood Zone 1 (at lowest risk of flooding). 'Water compatible' infrastructure (outfall, pipes and tunnel) falls within Flood Zones 2 and 3 and are not considered to be at high risk from fluvial flooding with the implementation of best

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	risks will be managed, taking climate change into account. The minimum requirements for FRAs are that they should: • be proportionate to the risk and appropriate to the scale, nature and location of the project; • consider the risk of flooding arising from the project in addition to the risk of flooding to the project; • take the impacts of climate change into account clearly stating the development lifetime over which the assessment has been made; • be undertaken by competent people, as early as possible in the process of preparing the proposal; • consider both the potential adverse and beneficial effects of flood risk management infrastructure including raised defences, flow channels, flood storage areas and other artificial features together with the consequences of their failure; • consider the vulnerability of those using the site, including arrangements for safe access; • consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and identify flood risk reduction measures, so that assessments are fit for the purpose of the decisions being made;	practice construction methodology which is captured in the Code of Construction Practice (App. Doc. Ref. 5.4.2.1 and 5.4.2.2). The methodology for the Flood Risk Assessment follows relevant planning policy guidance including the NPSWW and relevant legislation applied is set out in Chapter 20 Water Resources (App. Doc. Ref. 5.2.20). Flood risk vulnerability and flood zone compatibility is shown in Table 13 of Chapter 20 Water Resources of the ES (App. Doc. Ref. 5.2.20) and highlights cells indicating elements of the Proposed Development. The proposed WWTP is considered 'Less Vulnerable' in terms of flood risk vulnerability and is sequentially located within Flood Zone 1 and therefore passes the Sequential Test. Other water compatible elements of the Proposed Development are deemed appropriate development within Flood Zones 1, 2 and 3a. Additionally, below ground pipelines and tunnel elements of the Proposed Development located in Flood Zone 3b would remain operational during flood conditions and would have a negligible impact on floodplain storage, surface water

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	• consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes; • include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that this is acceptable for the particular project; • consider how the ability of water to soak into the ground may change with development, along with how the proposed layout of the project may affect drainage systems; • consider if there is a need to be safe and remain operational during a worst case flood event over the development's lifetime; and • be supported by appropriate data and information, including historical information on previous events.	flows or flood risk elsewhere. It is considered that these elements in Flood Zone 3b are also considered appropriate development.
4.4.7-4.4.8	Applicants for projects which may be affected by, or may add to, flood risk should arrange pre-application discussions with the Environment Agency, and, where relevant, other bodies such as Internal Drainage Boards, sewerage undertakers, navigation authorities, highways authorities and reservoir owners and operators. Such discussions should identify the likelihood and possible extent and nature of the flood risk, to help scope the FRA, and identify the information that will be required	The Applicant has engaged with the following consultees in respect of flood risk and the Proposed Development: - Environment Agency - South Cambridgeshire District Council and Cambridge City Council as the host authorities - Lead Local Flood Authority - Waterbeach Level Internal Drainage Board - The Canal and River Trust

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	by the decision maker to reach a decision on the application once it has been submitted and examined. If the Environment Agency has concerns about the proposal on flood risk grounds, the applicant should discuss these concerns with the Environment Agency and take all reasonable steps to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the Environment Agency's concerns.	Engagement was taken with particular reference to scoping the methodology and provisions of the FRA and details of engagement are set out in the Consultation Report (App. Doc. Ref. 6.1). The Consultation Report also sets out how the Applicant has had due regard to comments raised during statutory consultation.
4.4.10	In determining an application for development consent, the decision maker should be satisfied that, where relevant: • the application is supported by an appropriate FRA; • the Sequential Test has been applied as part of site selection; • the proposal is in line with any relevant national and local flood risk management strategy; • a sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk; • priority has been given to the use of sustainable drainage systems (SuDS), and the requirements set out in the next paragraph on National Standards have been met; and	See response to paragraphs 4.4.4 – 4.4.5 above. A Drainage Strategy (App. Doc. Ref. 5.4.20.12) has been prepared in respect of the Proposed Development. The report sets out details of the drainage requirements for the permanent works associated with the scheme. It also sets out the SuDS hierarchy that will be applied where appropriate to the proposed WWTP.

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	• in flood risk areas, the project is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed over the lifetime of the development.	
4.4.11	For construction work which has drainage implications, approval for the project's drainage system will form part of the development consent issued by the decision maker. The decision maker will therefore need to be satisfied that the proposed drainage system complies with any National Standards published by Ministers under Paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 201078. In addition, the development consent order, or any associated development consent obligations, will need to make provision for the adoption and maintenance of any SuDS, including any necessary access rights to property. The decision maker should be satisfied that the most appropriate body is being given the responsibility for maintaining any SuDS, taking into account the nature and security of the infrastructure on the proposed site. The responsible body could include, for example, the applicant, the landowner, the relevant local authority, or another body such as the Internal Drainage Board.	A Drainage Strategy (App. Doc. Ref. 5.4.20.12) has been prepared in respect of the Proposed Development. The report sets out details of the drainage requirements for the permanent works associated with the scheme and identified that the Proposed Development's drainage has been designed in accordance with national standards for SuDS. This includes applying industry standard guidance such as the CIRIA SuDS Manual. The Drainage Strategy has been prepared in compliance with the national standards published by the Ministers under Paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010. Anglian Water will be responsible for the maintenance and inspection of all drainage infrastructure in respect of the Proposed Development.
4.4.13	The decision maker should not consent development in Flood Zone 2 unless it is satisfied that the Sequential Test requirements have been met. In relation to waste	See response to paragraphs 4.4.4 – 4.4.5 above.

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	water infrastructure, it should not consent development in Flood Zone 3a unless it is for water treatment works which do not need to remain operational during times of flood, or sewage treatment works (if adequate measures to control pollution and manage sewage during flooding events are in place). It should not consent development in Flood Zone 3b unless it is satisfied that the Sequential and Exception Test requirements have been met (see below). However, when seeking development consent on a site allocated in a development plan through the application of the Sequential Test, informed by a strategic flood risk assessment (SFRA), applicants need not apply the Sequential Test, but should apply the sequential approach to locating development within the site.	
4.4.14	Preference should be given to locating projects in Flood Zone 1. If there is no reasonably available site in Flood Zone 1, then projects can be located in Flood Zone 2. If there is no reasonably available site in Flood Zones 1 or 2, then essential infrastructure (including nationally significant infrastructure) projects can be located in Flood Zone 3 subject to the Exception Test.	The Proposed Development has undergone an extensive site selection process which is outlined in Chapter 3 Site Selection and Alternatives of the ES (App. Doc. Ref. 5.2.3) sets out the main alternatives considered by the Applicant. The preferred location for the proposed WWTP is on land which is in Flood Zones 1 (at lowest risk of flooding). 'Water compatible' infrastructure (outfall, pipes and tunnel) falls within Flood Zones 2 and 3 and are not considered to be at high risk from fluvial flooding with the implementation of best practice construction methodology

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		which is captured in the Code of Construction Practice (App. Doc. Ref.s 5.4.2.1 and 5.4.2.2).
4.4.15-4.4.17	If, following application of the Sequential Test, it is not possible, consistent with wider sustainability objectives, for the project to be located in zones of lower probability of flooding than Flood Zone 3, the Exception Test can be applied. The test provides a method of managing flood risk while still allowing necessary development to occur. The Exception Test is only appropriate for use where the Sequential Test alone cannot deliver an acceptable site, taking into account the need for essential infrastructure to remain operational during floods. It may also be appropriate to use it where, as a result of the alternative site(s) at lower risk of flooding being subject to national designations such as landscape, heritage and nature conservation designations, for example, Areas of Outstanding Natural Beauty (AONBs), Sites of Special Scientific Interest (SSSIs) and World Heritage Sites (WHS), it would not be appropriate to require the development to be located on the alternative site(s). All the three elements of the test will have to be passed for development to be consented. For the Exception	See response to paragraphs 4.4.4 – 4.4.5 above.

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	Test to be passed: a) it must be demonstrated that the project provides wider sustainability benefits to the community that outweigh flood risk; b) the project should be on developable previously-developed land80 or, if it is not on previously developed land, that there are no reasonable alternative sites on developable previously developed land; and c) a FRA must demonstrate that the project will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	
4.4.18	To satisfactorily manage flood risk, arrangements are required to manage surface water and the impact of the natural water cycle on people and property.	Mitigation measures to manage flood risk during construction are set out in the Code of Construction Practice (CoCP) (App. Doc. Ref. 5.4.2.1 and 5.4.2.2) and will be implemented through a Construction Environmental Management Plan (CEMP). The CoCP outlines that all construction activities will be undertaken to avoid any significant increase of flood risk. The CEMP will require that procedures are put in place to deal with potential flood events, as is relevant to the flood risk at each working area. Operational flood risk within the proposed WWTP from surface water and groundwater sources will be managed by the drainage strategy, which will in turn be informed by continuous monitoring of groundwater levels. The

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		drainage strategy further allows for future expansion of attenuation storage capacity if required. The drainage strategy is therefore considered to be the most vital element of flood risk management within the proposed WWTP and, in combination with flood warning and evacuation measures outlined in the FRA (Application Document Ref 5.4.20.1), in effect performs the role of an operational flood risk management strategy. Further details on surface water drainage arrangements during construction and operation are set out in Chapter 2 Project Description of the ES (App. Doc. Ref. 5.2.2).
4.4.19	In this document the term Sustainable Drainage Systems (SuDS) refers to the whole range of sustainable approaches to surface water drainage management including where appropriate: • source control measures including rainwater recycling and drainage; • infiltration devices to allow water to soak into the ground that can include individual soakaways and communal facilities; • filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns; • filter drains and porous pavements to allow rainwater and run-off to infiltrate into permeable material below ground and provide storage if needed; • basins, ponds and tanks to hold excess	Please see response to paragraph 4.4.11 above.

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	water after rain and allow controlled discharge that avoids flooding; and • flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding.	
4.4.20-22	Site layout and surface water drainage systems should cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts. The surface water drainage arrangements for any project should be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project unless specific off-site arrangements are made and result in the same net effect. It may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration facilities or attenuation storage to be provided outside the project site, if necessary through the use of a planning obligation. The sequential approach should be applied to the layout and design of the project. More vulnerable uses should	The Drainage Strategy (App. Doc. Ref. 5.4.20.12) sets out how the drainage design allows for future expansion of attenuation storage capacity if required. Furthermore, all drainage design has been developed to be based on a 1:100-year storm event with +40% allowance for climate change. Drainage features which have been incorporated in the design of the Proposed Development during construction and operation include soakaways with rain/surface water recycling systems, swales/lagoon, seasonal ponds and land art. These are shown on the Landscape Master Plan included and described in the DAS (App. Doc. Ref. 7.6) and the LERMP (App. Doc. Ref. 5.4.8.14). The Drainage Strategy identifies that the drainage has been designed in accordance with best practice national SuDS guidance and policy.

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	be located on parts of the site at lower probability and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat and flood storage uses. Opportunities should be taken to lower flood risk by reducing the built footprint of previously-developed sites and using SuDS.	
4.4.23	Essential waste water infrastructure which has to be located in flood risk areas should: • where the development is for water treatment works, remain operational when floods occur; • where the development is for sewage treatment works, be designed to be resilient to the effects of flooding (e.g. adequate measures to control pollution and manage sewage during flooding events are in place).	The proposed WWTP is located in Flood Zone 1 which is at lowest risk of flooding. Nonetheless, the Proposed Development has been designed to manage flood risks in the future and all drainage design has been developed to be based on a 1:100-year storm event with +40% allowance for climate change. This allows for the proposed WWTP to remain operational once if at risk of any flooding.
4.4.24	The receipt of and response to warnings of floods is an essential element in the management of the residual risk of flooding. Flood warning and evacuation plans should be in place for those areas at an identified risk of flooding. The applicant should take advice from the emergency services when producing an evacuation plan for the project as part of the FRA. Any emergency planning documents, flood warning and evacuation procedures that are required should be identified in the FRA.	The proposed WWTP is located in Flood Zone 1 and safe refuge will be available on site in a flood event. Should staff and visitors leave the safe refuge of the proposed WWTP during a flood event, flooding may have already occurred in adjacent watercourses such as the River Cam or Quy Water. If flooding has commenced and flood depths along roads or public footpaths/bridleways exceed 25cm, staff and visitors are advised to remain on

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		site, or seek refuge within adjacent Flood Zone 1 areas, until flood waters recede. The CoCP Part A and B (Application Document Ref 5.4.2.1 & 2) requires that the Principal Contractor(s) consult with the Environment Agency, Lead Local Flood Authority and any other relevant risk management authorities (such as the emergency services) in respect of the flood risks in the preparation of the Emergency Preparedness Plan for construction work in areas at risk of flooding.
4.5.3 **(Biodiversity and geological conservation)**	Where the development is subject to EIA the applicant should ensure that the ES clearly sets out any effects on internationally, nationally and locally designated sites of ecological or geological conservation importance, on protected species, and on habitats and other species identified as being of principal importance for the conservation of biodiversity. The applicant should provide environmental information proportionate to the infrastructure where EIA is not required. The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.	Chapter 8 Biodiversity of the ES (App. Doc. Ref. 5.2.8) sets out the Applicant's assessment of potential effects of the Proposed Development on internationally, nationally and locally designated sites of ecological or geological conservation importance. This concludes that during operation, the Proposed Development will have some impact on biodiversity receptors during construction and operation. These are detailed in Chapter 8 Biodiversity of the ES (App. Doc. Ref. 5.2.8). However, once the mitigation measures required by the CoCP have been implemented, these impacts are not considered likely to be significant.
4.5.6	As a general principle, and subject to the specific policies below, development should aim to avoid significant harm to biodiversity and geological	The Proposed Development has sought to avoid significant harm to features of biodiversity interest, both during the consideration of alternatives and during the EIA process.

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	conservation interests, including through mitigation and consideration of reasonable alternatives85 where significant harm cannot be avoided, then appropriate compensation measures should be sought.	The findings and conclusions set out in Chapter 8, Biodiversity of the ES (App. Doc. Ref. 5.2.8) demonstrate how where the Proposed Development may give rise to significant effects, the mitigation hierarchy has been applied. This identifies that the Proposed Development has sought to avoid harm in the first instance, mitigate harm where it cannot be avoided and compensate harm where it has not been possible to adequately mitigate or avoid such effects. Mitigation measures have been incorporated in the design of the Proposed Development in order to mitigate any adverse effects on features of biodiversity and geological importance. These measures have ensured that effects of the Proposed Development are not significant and include the following: - Implementation of early planting and management to promote landscaping vegetation establishing quickly and successfully - Retention of existing treelines and hedgerow lines - Habitat reinstatements, restoration and creation measures - Translocation of rare floral species to suitable locations - Compensation bat roost provision

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		Additionally, the following beneficial effects are identified: - reptile species through creation of habitat suitable for use including hibernacula and refuge areas; and - habitats within the proposed WWTP through creation of more diverse grassland, woodland, scrub and seasonal ponds along with additional ecological features such as bat and bird boxes and bee banks. This additional habitat provision will support the local Nature Recovery Network.
4.5.10	Where a proposed development on land within or outside a SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments), development consent should not normally be granted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits (including need) of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs. The decision maker should ensure that the applicant's proposals to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's	There are no SSSIs within the Order Limits of the Proposed Development. Chapter 8 Biodiversity (App. Doc. Ref. 5.2.8) sets out how the Proposed Development will not have any adverse effects on a SSSI.

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	biodiversity or geological interest, are acceptable. Where necessary, requirements and/or development consent obligations should be used to ensure these proposals are delivered.	
4.5.11	Marine Conservation Zones (MCZs) (Marine Protected Areas in Scotland), introduced under the Marine and Coastal Access Act 2009, are areas that have been designated for the purpose of conserving marine flora or fauna, marine habitats or types of marine habitat or features of geological or geomorphological interest. The protected feature or features and the conservation objectives for the MCZ are stated in the designation order for the MCZ, which provides statutory protection for these areas. Measures to restrict damaging activities will be implemented by the MMO and other relevant organisations. As a public authority, the decision maker is bound by the duties in relation to MCZs imposed by sections 125 and 126 of the Marine and Coastal Access Act 2009.	The Proposed Development will not affect any relevant marine areas as defined in the Planning Act 2008 (as amended by s. 23 of the Marine and Coastal Access Act 2009) and therefore this policy is not relevant to the Proposed Development.
4.5.13	Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The decision maker should not grant development consent for any development that would result in its loss or deterioration unless the benefits (including need) of the development, in that location, outweigh the loss of the	The Proposed Development will not impact any pockets of ancient woodland and Chapter 8 Biodiversity (App. Doc. Ref. 5.2.8) sets out how there are no records of ancient woodland within the scope of the biodiversity assessment.

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	woodland habitat. Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals, the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons why.	
4.5.16	Other species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and thereby requiring conservation action. The decision maker should ensure that applicants have taken measures to ensure these species and habitats are protected from the adverse effects of development. Where appropriate, requirements or planning agreements may be used in order to deliver this protection. The decision maker should refuse consent where harm to the habitats or species and their habitats would result unless the benefits (including need) of the development clearly outweigh that harm.	The biodiversity assessment reported in Chapter 8, Biodiversity of the ES (App. Doc. Ref. 5.2.8) considers potential impacts on species and habitats and sets out mitigation measures taken to ensure that species and habitats are protected from any potential adverse effects of the Proposed Development. With mitigation, no significant adverse effects are identified in respect of the Proposed Development.
4.5.17	The applicant should include appropriate mitigation measures as an integral part of the proposed development. In particular, the applicant should demonstrate that: • during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works; • during	The Code of Construction Practice (App. Doc. Ref.5.2.4.1 and 5.2.4.2) sets out mitigation measures proposed during the construction period of the Proposed Development. A range of landscaping, ecological, drainage measures have been embedded into the design of the Proposed Development to mitigate, compensate and enhance

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	construction and operation, best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements; • habitats will, where practicable, be restored after construction works have finished; and • opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals.	habitats and features of biodiversity value and importance. Details are set out in Chapter 8 Biodiversity (App. Doc. Ref.5.2.8), Chapter 2 Project Description (App. Doc. Ref.5.2.2) and the Code of Construction Practice (App. Doc. Ref.5.2.4.1 and 5.2.4.2).
4.6.6 **(Coastal Change)**	Where relevant, applicants should undertake coastal geomorphological and sediment transfer modelling to predict and understand impacts and help identify relevant mitigating or compensatory measures.	The Proposed Development will not affect any relevant marine areas as defined in the Planning Act 2008 (as amended by s. 23 of the Marine and Coastal Access Act 2009) and therefore this policy is not relevant to the Proposed Development.
4.6.7	The ES (see Section A) should include an assessment of the effects on the coast, distinguishing between the construction, operation and decommissioning project stages as appropriate. In particular, applicants should assess: • the impact of the proposed project on coastal processes and geomorphology, including by taking account of potential impacts from climate change. If the development will have an impact on coastal processes the applicant must demonstrate how the impacts will be managed to minimise adverse impacts on other parts of the coast; • the implications of the proposed project on strategies for managing the coast as set out in Shoreline	The Proposed Development will not affect any relevant marine areas as defined in the Planning Act 2008 (as amended by s. 23 of the Marine and Coastal Access Act 2009) and therefore this policy is not relevant to the Proposed Development.

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	Management Plans, any relevant Marine Plans, River Basin Management Plans and capital programmes for maintaining flood and coastal defences; • the effects of the proposed project on marine ecology, biodiversity and protected sites; • the effects of the proposed project on maintaining coastal recreation sites and features; and • the vulnerability of the proposed development to coastal change, taking account of climate change, during the project's operational life and any decommissioning period.	
4.6.8	For any projects involving dredging or disposal into the sea, the applicant should consult the Marine Management Organisation (MMO) at an early stage. The applicant should also consult the MMO on projects which could impact on coastal change, since the MMO may also be involved in considering other projects which may have related coastal impacts. The applicant should examine the broader context of coastal protection around the proposed site, and the influence in both directions, i.e., coast on site, and site on coast.	The Proposed Development will not affect any relevant marine areas as defined in the Planning Act 2008 (as amended by s. 23 of the Marine and Coastal Access Act 2009) and therefore this policy is not relevant to the Proposed Development.
4.6.9	The applicant should be particularly careful to identify any effects of physical changes on the integrity and special features of Marine Conservation Zones, candidate marine Special Areas of Conservation (SACs), coastal SACs and candidate coastal SACs, coastal Special Protection Areas (SPAs) and potential coastal SPAs,	The Proposed Development will not affect any relevant marine areas as defined in the Planning Act 2008 (as amended by s. 23 of the Marine and Coastal Access Act 2009) and therefore this policy is not relevant to the Proposed Development.

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	Ramsar sites, Sites of Community Importance (SCIs) and potential SCIs and Sites of Special Scientific Interest.	
4.6.10-4.6.13	The decision maker should be satisfied that the proposed development will be resilient to coastal erosion and deposition, taking account of climate change, during the project's operational life and any decommissioning period. The decision maker should not normally consent new development in areas of dynamic shorelines where the proposal could inhibit sediment flow or have an adverse impact on coastal processes at other locations. Impacts on coastal processes must be managed to minimise adverse impacts on other parts of the coast. Where such proposals are brought forward, consent should only be granted where the decision maker is satisfied that the benefits (including need) of the development outweigh the adverse impacts. The decision maker should ensure that applicants have restoration plans for areas of foreshore disturbed by direct works and will undertake pre- and post-construction coastal monitoring arrangements with defined triggers for intervention and restoration. In addition to this NPS the decision maker must have regard to the appropriate marine policy documents, as provided for in the Marine and Coastal Access Act 2009. The decision maker may also have regard to any	The Proposed Development will not affect any relevant marine areas as defined in the Planning Act 2008 (as amended by s. 23 of the Marine and Coastal Access Act 2009) and therefore this policy is not relevant to the Proposed Development.

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	relevant Shoreline Management Plans. Substantial weight should be attached to the risks of flooding and coastal erosion. The applicant must demonstrate that full account has been taken of the policy on assessment and mitigation in Section 3.6 of this NPS, taking account of the potential effects of climate change on these risks as discussed above.	
4.6.14	Applicants should propose appropriate mitigation measures to address adverse physical changes to the coast in consultation with the MMO, the Environment Agency, Local Planning Authorities, other statutory consultees, Coastal Partnerships and other coastal groups, as it considers appropriate. The decision maker should consider whether the mitigation requirements put forward by an applicant are acceptable and whether requirements should be attached to any grant of development consent in order to secure their delivery.	The Proposed Development will not affect any relevant marine areas as defined in the Planning Act 2008 (as amended by s. 23 of the Marine and Coastal Access Act 2009) and therefore this policy is not relevant to the Proposed Development.
4.7.2-4.7.4 **(Landscape and Visual Impacts)**	The applicant should carry out a landscape and visual assessment and report it in the ES. A number of guides have been produced to assist in addressing landscape issues93. The landscape and visual assessment should include reference to any landscape character assessment and associated studies, as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these	A landscape and visual impact assessment (LVIA) has been undertaken in respect of the Proposed Development. The findings and conclusions of this assessment and potential effects on landscape character and visual amenity are reported in Chapter 15 Landscape and Visual Amenity of the ES (App. Doc. Ref.5.2.15). The assessment considers landscape character assessments and associated studies within the scope of the defined study area. The assessment has considered

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	assessments in local development documents in England and local development plans in Wales. 4.7.3 The applicant's assessment should include the effects during construction of the project and the effects of the completed development and its operation on landscape components and landscape character. 4.7.4 The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include any light pollution effects including on local amenity and nature conservation.	local and national guidance to ensure that all relevant assessments/studies are included in the assessment in respect of the Proposed Development. As such, the assessment takes into account the Greater Cambridge Landscape Character Assessment and relevant local planning policies. Chapter 15 Landscape and Visual Amenity of the ES (App. Doc. Ref. 5.2.15) also includes a qualitative assessment of the effects of lighting which was informed by the quantitative Lighting Assessment (App. Doc. Ref. 5.4.15.3) having regard to the proposed Lighting Design Strategy (App. Doc. Ref. 5.4.2.5).
4.7.6	Landscape effects depend on the existing character of the local landscape, its current quality, how highly it is valued and its capacity to accommodate change. All of these factors need to be considered in judging the impact of a project on landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints, the aim should be to minimise harm to the	The LVIA methodology set out in Chapter 15 Landscape and Visual (App. Doc. Ref. 5.2.15) sets out the criteria for assessing the landscape value, ability to accommodate change and sensitivity of the existing landscape setting of the Proposed Development. A site selection process was followed to identify the location of the Proposed Development (as outlined in Chapter 3: Site Selection and Alternatives (App. Doc. Ref.5.2.3)). Preliminary design development focussed on reducing landscape impacts and ensuring the Proposed

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	landscape, providing reasonable mitigation where possible and appropriate.	Development could be adequately mitigated. The landscape masterplan referred to which is contained within the LERMP (App. Doc. Ref. 5.4.8.14) illustrates the proposed landscape mitigation.
4.7.7	National Parks, the Broads and Areas of Outstanding Natural Beauty (AONB), have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the decision maker has a statutory duty to have regard to in its decisions94. The conservation of the natural beauty of the landscape and countryside should be given substantial weight by the decision maker in deciding on applications for development consent in these areas.	The Scheme is not located in an Area of Outstanding Natural Beauty or a National Park therefore this policy is not applicable in respect of the Proposed Development.
4.7.8	Nevertheless, the decision maker may grant development consent in these areas in exceptional circumstances. The development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of: (i) the need for the development, including in terms of any national considerations95, and the impact of consenting, or not consenting it, upon the local economy; (ii) the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way96; and (iii) Any	The Scheme is not located in an Area of Outstanding Natural Beauty or a National Park therefore this policy is not applicable in respect of the Proposed Development.

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	detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.	
4.7.9	Where consent is given in these areas, the decision maker should make sure that the applicant has ensured that the project will be carried out to high environmental standards, and, where necessary should consider the application of appropriate requirements to ensure these standards are delivered.	The Scheme is not located in an Area of Outstanding Natural Beauty or a National Park therefore this policy is not applicable in respect of the Proposed Development.
4.7.10-4.7.11	The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints. This should include projects in England which may have impacts on National Scenic Areas in Scotland. The fact that a proposed project will be visible from within a designated area should not in itself be a reason for refusing consent.	The Scheme is not located in an Area of Outstanding Natural Beauty or a National Park, nor will it impact upon such nationally designated areas as confirmed by the LVIA contained in Chapter 15 Landscape and Visual (App. Doc. Ref. 5.2.15), therefore this policy is not applicable in respect of the Proposed Development.
4.8.5 **(Land use including open space, green**	The ES should identify existing and proposed land-uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a	Chapter 6 Agricultural Land and Soil Resources of the ES (App. Doc. Ref. 5.2.6) provides an assessment of the effects of the Proposed Development on agricultural land, which is the primary land use within the Order Limits.

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infrastructure and green belt)	neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan.	The Proposed Development will unlock land for housing development which will help bring forward the wider planning objectives of the host authorities, arising from population growth and urbanisation in Cambridge, and in Waterbeach. Not granting development consent would preclude a new development opportunity on land where the existing WWTP is located, which has been long identified by the host authorities.
4.8.6	Applicants will need to consult the local community on their proposals to build on open space, sports or recreational buildings and land. Taking account of the consultations, applicants should consider providing new or additional open space, including green infrastructure, sport or recreation facilities, to substitute for any losses as a result of their proposal. Applicants should use any up-to-date local authority assessment or, if there is none, provide an independent assessment to show whether the existing open space, sports and recreational buildings and land is surplus to requirements.	This project does not propose building on existing open space, sports or recreational buildings and land. The Applicant has undertaken public consultation and given regard to the consultation responses, including considering the comments raised about the land required for the Proposed Development. Notwithstanding, the recreational connectivity has formed a central part of the design of the Proposed Development. The Applicant recognises that Cambridgeshire has one of the lowest levels of natural green space available for public access in the UK, and therefore has taken the opportunity to provide new connections to existing PRoW as part of the design. Section 4.8 of this Planning Statement sets out further details. The design responds to feedback provided by

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		stakeholders who identified a gap in the PRoW network and lack of connectivity in the area.
4.8.8	Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification), and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations. Applicants should also identify any effects and seek to minimise impacts on soil quality taking into account any mitigation measures proposed. For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination.	The Applicant has undertaken an extensive site selection process in order to identify the preferred site. This is summarised in the Site Selection Report (NTS) (App. Doc. Ref. 7.3). As such, the proposed WWTP was fixed in terms of general location, which removed any opportunity to deliver the proposed WWTP on land that was not almost entirely agricultural in nature. Therefore, the use of agricultural land, 85% of which is grade 2 and grade 3a agricultural land, deemed best and most versatile (BMV), is unavoidable to successfully deliver the Proposed Development. Notwithstanding, the Applicant has made every effort as far as reasonably practicable to mitigate the effects on BMV agricultural land. An outline Soil Management Plan (App. Doc. Ref.5.4.6.3) will govern the reinstatement of land required for construction purposes, including agricultural land, to its previous use. Landscaping mitigation measures outlined in the CoCP (App. Doc. Ref.5.4.2.1) set out proposals to integrate re-use of all surplus soil resources and measures to offset as much as possible the effects of the Proposed Development. This primarily will take the form of an earth bank, which provides

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		a multi-purpose mitigation measure, forming part of the landscaping proposals to screen visual effects of the Proposed Development. The Applicant has also assessed all land within the Order Limits for sources of contamination, the details of which are set out in Chapter 14 Land Quality of the ES (App. Doc. Ref. 5.2.14). Primary mitigation measures will ensure that the design of the operational site includes appropriate bunding of tanks and use of hardstanding to break any significant pathways for contamination.
4.8.9	Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place.	The land quality assessment contained in Chapter 14 Land Quality of the ES (App. Doc. Ref. 5.2.14) sets out that two Mineral Safeguarding Areas (MSA) are present within the study area related to the River Terrace Deposits and Chalk. The assessment concludes that there are no potential significant effects identified as a result of the Proposed Development.
4.8.10	The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances. Applicants should therefore determine whether their proposal, or any part of it, is	As described in the response to paragraph 4.8.8, The Applicant has undertaken an extensive site selection process in order to identify the preferred site. This is summarised in the Site Selection Report (NTS) (App. Doc. Ref. 7.3).

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	within an established Green Belt and, if it is, whether their proposal may be inappropriate development within the meaning of Green Belt policy (as set out below).	As such, the proposed WWTP was fixed in terms of general location, which removed any opportunity to deliver the proposed WWTP on land that was not almost entirely agricultural in nature and incidentally, land within the Green Belt. Section 4.8 of this Planning Statement sets out an assessment of the Proposed Development against the NPSWW and NPPF policies in relation to development in the Green Belt. Chapter 6 of this Planning Statement sets out the overall assessment of the application proposals and the basis on which the Secretary of State can conclude that the very special circumstances needed to justify a grant of development consent have been demonstrated. Please refer to these two sections of the Planning Statement for a full assessment of compliance with the NPSWW and other relevant national and local planning policy.
4.8.13	The decision maker should not grant consent for development on existing open space, sports and recreational buildings and land unless an assessment has been undertaken either by the local authority or independently, which has clearly shown the open space	This project does not propose building on existing open space, sports or recreational buildings and land. Please refer to the Applicant's response to paragraph 4.8.6 above.

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	or the buildings and land to be surplus to requirements or the decision maker determines that the benefits of the project (including need) outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities. The loss of playing fields should only be allowed where applicants can demonstrate that they will be replaced with facilities of equivalent or better quantity or quality in a suitable location.	
4.8.15	Where networks of green infrastructure have been identified in development plans, they should normally be protected from development, and, where possible, strengthened by or integrated within it.	Please see response to paragraph 4.8.6 above.
4.8.17	In considering the impact on maintaining coastal recreation sites and features the decision maker should expect applicants to have taken advantage of opportunities to maintain and enhance access to the coast. In doing so the decision maker should consider the implications for development of the creation of a continuous signed and managed route around the coast, as provided for in the Marine and Coastal Access Act 2009.	The Proposed Development will not affect any relevant marine areas as defined in the Planning Act 2008 (as amended by s. 23 of the Marine and Coastal Access Act 2009) and therefore this policy is not relevant to the Proposed Development.
4.8.18	When located in the Green Belt, waste water infrastructure projects may comprise 'inappropriate	Section 4.8 of this Planning Statement sets out an assessment of the Proposed Development against the

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	development'103. Inappropriate development is by definition harmful to the Green Belt and there is a presumption against it. The decision maker will need to assess whether there are very special circumstances to justify inappropriate development. Very special circumstances will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In view of the presumption against inappropriate development, the decision maker will attach substantial weight to the harm to the Green Belt when considering any application for such development.	NPSWW and NPPF policies in relation to development in the Green Belt. Chapter 6 of this Planning Statement sets out the overall assessment of the application proposals and stipulates the Very Special Circumstances for development in the Green Belt. Please refer to these two sections of the Planning Statement for a full assessment of compliance with the NPSWW and other relevant national and local planning policy.
4.8.22	Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), the decision maker should ensure that the applicant has put forward appropriate mitigation measures to safeguard mineral resources.	Please see response to paragraph 4.8.9 above.
4.8.24	Rights of way, National Trails, and other rights of access to land (e.g., open access land) are important recreational facilities e.g., for walkers, cyclists and horse riders. The decision maker should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails and other rights of way. The decision maker should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements in	The Proposed Development will not affect the use of National Trails or Open Access Land. The Proposed Development, more specifically the proposed Waterbeach pipeline route, would cross seven existing PRoW; one of which would not be affected, and it is not proposed to close any of the other six PRoW but instead to provide safe priority crossings and/or temporary diversions. Safe access will be maintained.

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	respect of these measures might be attached to any grant of development consent.	Additionally, the Proposed Development's paths will be connected to the wider network of public rights of way, and a new bridleway will improve access to Quy Fen and Anglesey Abbey. Further details are set out in Chapter 2 Project Description (App. Doc. Ref. 5.2.2) and the Rights of Way Plans (App. Doc. Ref. 4.6).
4.9.4-4.9.5 **(Noise and Vibration)**	Where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment: • a description of the noise generating aspects of the development proposal leading to noise impacts, including the identification of any distinctive tonal, impulsive or low frequency characteristics of the noise; • identification of noise sensitive premises and noise sensitive areas that may be affected; • the characteristics of the existing noise environment; • a prediction of how the noise environment will change with the proposed development: – in the shorter term such as during the construction period; – in the longer term during the operating life of the infrastructure; and – at particular times of the day, evening and night as appropriate; • an assessment of the effect of predicted changes in the noise environment on any noise sensitive	The Applicant has undertaken a noise and vibration assessment which is contained in Chapter 17 Noise and Vibration of the ES (App. Doc. Ref. 5.2.17). This assessment identifies the likely effects of the Proposed Development on noise and vibration receptors. It includes and considers the following: - a description of the noise and vibration sources; - information regarding identified noise and vibration sensitive receptors; - a description of the characteristics of the existing ambient noise environment, including the results of a baseline survey; - Details of how the Proposed Development will impact the noise environment, including in relation to changes in traffic noise levels due to various factors such as the time of day;

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	premises and noise sensitive areas; and • measures to be employed in mitigating the effects of noise. The nature and extent of the noise assessment should be proportionate to the likely noise impact.	- An assessment of the noise impact as a result of construction, operation and decommissioning and whether these effects are significant; and - Mitigation measures proposed and an explanation of how the measures have been incorporated in the design (for instance the use of noise barriers where necessary). The proposed WWTP location and design aims to avoid significant adverse effects and minimise adverse noise and vibration impacts. Additionally, the noise mitigation measures are included at Chapter 2 Project Description of the ES (App. Doc. Ref. 5.2.2), Chapter 17 Noise and Vibration (App. Doc. Ref. 5.2.17) and the CoCP (App. Doc. Ref. 5.4.2.1 and 5.4.2.2).
4.9.6	The noise impact of ancillary activities associated with the development, such as increased road and rail traffic movements, or other forms of transportation, should be considered.	Chapter 17 Noise and Vibration of the ES (App. Doc. Ref. 5.2.17) conclude that with the implementation of mitigation measures during construction, there will be no significant effects in respect of the Proposed Development. During operation, there would also be no significant effects in respect of noise and vibration.
4.9.7	Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. For the	Please see response to paragraphs 4.9.4-4.9.5 above.

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	prediction, assessment and management of construction noise, reference should be made to any relevant British Standards and other guidance which also give examples of mitigation strategies. The applicant should consult the Environment Agency and Natural England as necessary and in particular with regard to assessment of noise on protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be taken into account.	The assessment contained in Chapter 17 Noise and Vibration of the ES (App. Doc. Ref. 5.2.17) considers the following British standards and guidance: - British Standard (BS) 8233, 2014 'Guidance on sound insulation and noise reduction for buildings' (British Standards Institution, 2014); - British Standard (BS) 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound' (British Standards Institution, 2019); - British Standard (BS) 5228:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites – Part 1: Noise' (British Standards Institution, 2014); - British Standard (BS) 5228:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites – Part 2: Vibration' (British Standards Institution, 2014); - British Standard (BS) 7385-2 'Evaluation and measurement for vibration in buildings. Guide to damage levels from ground borne vibration (British Standards Institution, 1993); Further details on the guidance and standards which have informed the noise and vibration assessment are contained within Chapter 17 Noise and Vibration of the ES (App. Doc. Ref. 5.2.17).

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		The Applicant has engaged with the Environment Agency throughout the pre-application process on a number of matters including the noise and vibration assessment. Details of engagement are included in the Consultation Report (App. Doc. Ref. 6.1). The biodiversity assessment contained within Chapter 8 Biodiversity of the ES (App. Doc. Ref. 5.2.8) has considered the impacts of noise on sensitive ecological receptors such as bats. Please refer to this assessment and conclusions for further details. Noise control measures are set out in the CoCP **(**App. Doc. Ref. 5.4.2.1 and 5.4.2.2)**.**
4.9.8	The project should demonstrate good design through selection of the quietest cost effective plant available; containment of noise within buildings wherever possible; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission.	The Proposed Development has been carefully developed to embed noise and vibration mitigation measures in the design to avoid and minimise effects on noise and vibration receptors as far as reasonably practicable, in addition to the proposed measures set out in the CoCP (App. Doc. Ref. 5.4.2.1 and 5.4.2.2). These embedded mitigation measures ensure that the Proposed Development complies with the NPSWW and demonstrates good design through the following ways: - the use of low noise generating plant and equipment - noise reduction measures (e.g., acoustic enclosures for plant)

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		- considerate siting and orientation of plant and equipment to maximise distances and screening effects - acoustic attenuation from earthwork bank integrated into the landscape masterplan Further details are set out in Chapter 17 Noise and Vibration of the ES (App. Doc. Ref. 5.2.17).
4.9.9	The decision maker should not grant development consent unless it is satisfied that the proposals will meet the following aims: • avoid significant adverse impacts on health and quality of life from noise; • mitigate and minimise adverse impacts on health and quality of life from noise; and • where possible, contribute to improvements to health and quality of life through the effective management and control of noise.	Please see responses to paragraphs 4.9.4-4.9.5 and 4.9.8 above. Chapter 17 Noise and Vibration of the ES (App. Doc. Ref. 5.2.17) concludes that there are no significant effects arising from the construction or operation of the Proposed Development.
4.9.13	In certain situations, and only when all other forms of noise mitigation have been exhausted, the applicant may consider it appropriate to provide noise mitigation through improved sound insulation to dwellings, or, in extreme cases, through compulsory purchase of affected properties in order to gain consent for what might otherwise be unacceptable development.	Chapter 17 Noise and Vibration of the ES (App. Doc. Ref. 5.2.17) concludes that there are no significant effects arising from the construction or operation of the Proposed Development, therefore, there is no requirement to undertake such forms of mitigation.
4.10.7 **(Historic Environment)**	As part of the ES the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance. The	Chapter 13 Historic Environment of the ES (App. Doc. Ref. 5.2.13) presents the Applicant's assessment of the potential effects on the historic environment as a result of the Proposed Development.

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	level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset. As a minimum the applicant should have consulted the relevant Historic Environment Record109 and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact.	The assessment includes a description of the heritage value (significance) of all assets within the defined study area. The use of heritage value versus significance is included within this assessment and a description of the methodology used to assess this. Assets with greater potential to be impacted have been described and assessed in greater detail. A setting assessment, to gauge its contribution to the heritage value of an asset, has also been undertaken for all relevant assets
4.10.8	Where a development site includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, representative visualisations may be necessary to explain the impact.	Chapter 13 Historic Environment of the ES (App. Doc. Ref. 5.2.13) presents the Applicant's assessment of the potential effects on the historic environment as a result of the Proposed Development. Desk-based research has been undertaken to inform the assessment of effects on the historic environment, including the technical appendix, Geophysical and trial trenching surveys (App. Doc. Ref. 5.4.13.5). A programme of evaluation, initially including geophysical survey and trial trenching, was agreed with Cambridgeshire Historic Environment Team (CHET).

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		Geophysical surveys were undertaken in March 2021 and September 2021. Trial trenching was undertaken between November 2021 and February 2022.
4.10.9	The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents	Chapter 13 Historic Environment of the ES (App. Doc. Ref. 5.2.13) presents the Applicant's assessment of the potential effects on the historic environment as a result of the Proposed Development. Section 4.10 of this Planning Statement considers the extent of impact of the Proposed Development on the significance of the setting of the identified designated assets within the Order Limits.
4.10.13	There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Once lost, heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated	In the design of the Proposed Development, the Applicant has given meticulous consideration to the desirability of sustaining, and where appropriate, enhancing the significance of heritage assets and their setting. Section 4.10 of this Planning Statement considers the extent of impact of the Proposed Development on the significance of the setting of the identified designated assets within the Order Limits. It provides a full assessment of the Proposed Development's compliance with the NPSWW.

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	assets of the highest significance, including Scheduled Monuments, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.	The planning balance in respect of the Proposed Development's impact on the historic environment set out in section 4.10 of this Planning Statement concludes that the Proposed Development will not cause 'substantial harm' to any heritage asset as it is not physically impacting an asset itself or causing 'total loss' of any asset. In the case of a change to the setting of a heritage asset, the impact of the Proposed Development equates to 'less than substantial harm'. It is therefore considered that the Proposed Development accords with the NPSWW paragraph 4.10.14.
4.10.14	Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss. Where the application will lead to substantial harm to or total loss of significance of a designated heritage asset the decision maker should refuse consent unless it can be demonstrated that the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm.	The planning balance in respect of the Proposed Development's impact on the historic environment set out in section 4.10 of this Planning Statement concludes that the Proposed Development will not cause 'substantial harm' to any heritage asset as it is not physically impacting an asset itself or causing 'total loss' of any asset. In the case of a change to the setting of a heritage asset, the impact of the Proposed Development equates to 'less than substantial harm'. In particular, there will be less than substantial harm caused to Baits Bite Lock, Horningsea and Fen Ditton Conservation Areas, and the Grade II Listed Poplar Hall and Grade II* Listed Biggin Abbey. With the application of the primary, secondary and tertiary mitigation described in this

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		chapter, it is predicted that the level of harm on these heritage assets will be at the lower end of less than substantial harm. It is therefore considered that the Proposed Development accords with the NPSWW paragraph 4.10.14.
4.10.18	Applicants should aim to design the proposal to avoid unnecessary damage but also ensure that any unavoidable losses are recorded.	Chapter 3 Site Selection and Alternatives of the ES (App. Doc. Ref. 5.2.3) sets out how the preferred option for the proposed WWTP takes into account environmental impacts as part of the site selection process. This includes taking into consideration the potential impacts on the historic environment in the extensive site selection process which informed the selection of the preferred site, to try to avoid impacting assets as far as reasonably practicable, taking into consideration other factors which were taken into account in the site selection process.
4.11.2-4.11.3 **(Air Quality and Emissions)**	Where the project is likely to have adverse effects on air quality the applicant should undertake an assessment of the impacts of the proposed project as part of the Environmental Statement (ES). The ES should describe: • any significant air emissions, their mitigation and any residual effects distinguishing between the project stages and taking account of any significant emissions from any road traffic generated by the project; • the predicted absolute emission levels from the proposed project, after mitigation methods	A detailed air quality assessment has been undertaken as part of the EIA, the outcomes of which are reported in Chapter 7 Air Quality of the ES (App. Doc. Ref.5.2.7). A baseline assessment has been undertaken and presented within Chapter 7 Air Quality of the ES (App. Doc. Ref. 5.2.7) which provides a summary of existing air quality conditions. The future year baseline is also presented to provide predicted future air quality conditions without the Proposed Development in place. The Chapter reports the

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	have been applied; and • existing air quality levels and the relative change in air quality from existing levels.	changes in modelled concentrations in line with relevant guidance. Air quality impacts have been assessed qualitatively for construction dust, construction plant and the emergency use of vents, known as 'Whessoe Valves' during operation, and quantitively for on road construction vehicle movements, on road operational vehicle movements and operational energy plant. Both the quantitative and qualitative approaches consider the maximum design envelope parameters and primary, secondary and tertiary mitigation measures adopted as part of the Proposed Development. No significant effects have been identified; however, where required, further mitigation measures are presented in Chapter 7 Air Quality of the ES (App. Doc. Ref. 5.2.7). In the case of dust, mitigation measures as recommended within the Institute of Air Quality Management (IAQM) guidance will be applied and are included within the CoCP (App. Doc. Ref. 5.4.2.1 and 5.4.2.2).
4.11.4-4.11.5	The decision maker should generally give air quality considerations substantial weight where a project	Chapter 7 Air Quality of the ES (App. Doc. Ref. 5.2.7) concludes that there will be no significant effects in

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	would lead to a deterioration in air quality in an area, or leads to a new area, where the air quality breaches any national air quality limits. However, air quality considerations will also be important where substantial changes in air quality are expected, even if this does not lead to any breaches of any national air quality limits. In all cases the decision maker must take account of relevant statutory air quality limits. Where a project is likely to lead to a breach of such limits applicants should work with the relevant authorities to secure appropriate mitigation measures to allow the proposal to proceed. In the event that a project will lead to non-compliance with a statutory limit the decision maker should refuse consent.	relation to air quality as a result of the Proposed Development during the construction, operation and decommissioning. It is therefore considered that the Proposed Development would not lead to any breach in the air quality thresholds set out in the NPSWW.
4.11.6-4.11.8	The decision maker should consider whether mitigation measures put forward by the applicant or considered at examination of a project, and which are needed both for operational and construction emissions, are acceptable. A construction management plan may help codify mitigation at this stage. In doing so the decision maker may refer to the conditions and advice in the Air Quality Strategy or any successor to it.	A detailed air quality assessment has been undertaken as part of the EIA, the outcomes of which are reported in Chapter 7 Air Quality of the ES (App. Doc. Ref. 5.2.7). The assessment has identified that construction effects would be temporary and proposed mitigation measures are set out within the CoCP (App. Doc. Ref. 5.4.2.1 and 5.4.2.2) and the Construction Traffic Management Plan (App. Doc. Ref. 5.4.19.7).

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	The mitigations identified in the section on transport impacts will help mitigate the effects of air emissions from transport.	Emissions from vehicle movements generated by construction activities have been assessed as not significant. Operational effects as a result of the Proposed Development are assessed as not significant. Any mitigation measures incorporated into the design proposals are set out in Chapter 7 Air Quality of the ES (App. Doc. Ref. 5.2.7).
4.12.4-4.12.6 **(Dust, artificial light, smoke, steam and insect infestation)**	The applicant should assess the potential for insect infestation and emissions of dust, steam, smoke and artificial light to have a detrimental impact on amenity, as part of the Environmental Statement. In particular, the assessment provided by the applicant should describe: • the type, quantity and timing of emissions; • aspects of the development which may give rise to emissions; • premises or locations that may be affected by the emissions; • effects of the emission on identified premises or locations; and • measures to be employed in preventing or mitigating the emissions. The applicant is advised to consult the relevant local planning authority and, where appropriate, the	An assessment of the potential effects of the Proposed Development on air quality has been carried out and is reported in Chapter 7 Air Quality of the ES (App. Doc. Ref. 5.2.7). The air quality assessment considers the likely significant effects on amenity from all types of emissions in respect of the Proposed Development. Chapter 15, Landscape and Visual of the ES (App. Doc. Ref. 5.2.15) considers artificial light in the assessment of landscape and visual impacts. Further, the Applicant has prepared a Statutory Nuisance Statement (App. Doc. Ref. 7.13) in respect of the Proposed Development. It considers the embedded and essential

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	Environment Agency (EA) about the scope and methodology of the assessment.	mitigation measures proposed in the application in relation to 'statutory nuisances' which include: - Emissions (including air quality and odour) - Artificial lighting - Noise - Insect infestation The assessment concludes that construction, operation, use and maintenance of the Proposed Development would not give rise to impacts which would be likely to constitute a statutory nuisance as defined by the Environmental Protection Act 1990. Both the Environment Agency and the host authorities have been consulted throughout the pre-application process on matters including the scope and methodology of the ES assessments where appropriate. Details are set out in the Consultation Report (App. Doc. Ref. 6.1) and Chapter 4 Consultation of the ES (App. Doc. Ref. 5.2.4).
4.12.13	Mitigation measures may include one or more of the following: • engineering: prevention of a specific emission at the point of generation; control, containment and abatement of emissions if generated; • lay-out: adequate distance between source and sensitive receptors; reduced transport or handling of	The assessment concludes that construction, operation, use and maintenance of the Proposed Development would not give rise to impacts which would be likely to constitute a statutory nuisance as defined by the Environmental Protection Act 1990.

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	materials; • administrative: limiting operating times; restricting activities allowed on the site; implementing management plans. Applicants should consider the need for such a scheme to reduce any loss to amenity which might arise during the construction, operation and decommissioning of the development. A construction management plan may help codify mitigation at that stage.	Notwithstanding, the mitigation measures in respect of the Proposed Development in relation to dust, artificial light, smoke, steam and insect infestation are included within the following documents: - Chapter 3 Site Selection and Alternatives of the ES (App. Doc. Ref. 5.2.3) sets out how the preferred option for the proposed WWTP takes into account environmental impacts as part of the site selection process. - Chapter 7 Air Quality of the ES (App. Doc. Ref. 5.2.7) sets out the findings and conclusions of the air quality assessment which also provides details of the embedded design, essential mitigation and enhancement measures proposed to minimise the effects of the Proposed Development on air quality. - Chapter 15, Landscape and Visual of the ES (App. Doc. Ref. 5.2.15) considers artificial light in the assessment of landscape and visual impact and sets out the proposed embedded design, essential mitigation and enhancement measures proposed to minimise the effects of the Proposed Development. - The CoCP (App. Doc. Ref.s 5.4.2.1 and 5.4.2.2) details the mitigation measures that will be implemented by the Principal Contractor during the construction of the Proposed Development which

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		include measures that are specifically proposed to manage control and reduction of dust, artificial light, smoke, steam and insect infestation. The CoCP also includes several management plans which assist with ensuring that good practice is followed in relation to particular elements of the construction of the Proposed Development.
4.13.3 **(Traffic and Transport Impacts)**	If a project is likely to have significant transport implications, the applicant's ES should include a transport assessment, using the NATA/WebTAG methodology stipulated in Department for Transport guidance, or any successor to such methodology. Applicants should consult the Highways Agency and/or the relevant highway authority, as appropriate, on the assessment and on mitigation measures. The assessment should distinguish between the construction, operation and decommissioning project stages as appropriate.	The Applicant has included a Transport Assessment as part of the ES (App. Doc. Ref. 5.4.19.3). This forms part of appendices to Chapter 19 Traffic and Transport of the ES (App. Doc. Ref. 5.2.19). The assessment has been informed by guidance set out by the Department for Transport and further information is set out in the documents listed above. The Transport Assessment follows the Department for Transport (DfT's) Transport Assessment Guidance and uses WebTAG. The Applicant has undertaken engagement with National Highways and the Highways team at Cambridgeshire County Council throughout the pre-application process. A Transport Assessment (TA) Scoping Report was provided to these two consultees to inform the scope of the TA and the associated methodology through pre-application discussions.
4.13.4	Where appropriate, the applicant should prepare a travel plan including demand management measures to	As the CWWTPR project meets the criteria for requiring a Transport Assessment, an Operational Workers Travel Plan

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	mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by public transport, walking and cycling, to reduce the need for parking associated with the proposal and to mitigate transport impacts.	has been prepared (App. Doc. Ref. 5.4.19.8) and includes demand management measures to mitigate transport impacts and reduce the need for parking.
4.13.5	If additional transport infrastructure is proposed, applicants should discuss with network providers the possibility of co-funding by Government for any third-party benefits. Guidance has been issued in England114 which explains the circumstances where this may be possible, although the Government cannot guarantee in advance that funding will be available for any given uncommitted scheme at any specified time.	No additional transport infrastructure is proposed which would require co-funding by Government for any third-party benefits.
4.13.8-4.13.9	Where mitigation is needed, possible demand management measures must be considered and, if feasible and operationally reasonable, required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts. The decision maker should have regard to the cost-effectiveness of demand management measures compared to new transport infrastructure, as well as the aim to secure more sustainable patterns of transport development when considering mitigation measures.	The effects of the Proposed Development on severance, pedestrian delay, driver delay, fear and intimidation, accidents and road safety, and hazardous and abnormal loads during construction have been determined to vary from neutral to slight and are not significant owing to the measures secured through the Construction Traffic Management Plan (App. Doc. Ref. 5.4.19.7) and CoCP (App. Doc. Ref. 5.4.2.1 and 5.4.2.2). These measures are set out to be able to identify if there are likely to be any cumulative effects and the DCO Order Limits and plans identify how it would occur and how it would be dealt with. These mitigation measures would be

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		expected to combine with the measure required as part of any other development to manage traffic demand. Further details in relation to mitigation measures are set out in Chapter 2 Project Description (App. Doc. Ref. 5.2.2) and Chapter 19 Traffic and Transport (App. Doc. Ref. 5.2.19).
4.13.10-4.13.11	Water-borne or rail transport is preferred over road transport at all stages of the project, where cost-effective. Where there is likely to be substantial HGV traffic, applicants should look to: • control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements; • make sufficient provision for HGV parking, either on the site or at dedicated facilities elsewhere, to avoid 'overspill' parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions; and • ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force. The decision maker may consider attaching requirements to any development consent in order to ensure such arrangements are delivered.	The Construction Traffic Management Plan (App. Doc. Ref. 5.4.19.7) and the CoCP (App. Doc. Ref.s 5.4.2.1 and 5.4.2.2) set out mitigation measures to manage and control construction traffic movements to and from the site (including HGVs).

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	If an applicant suggests that the costs of meeting any obligations or requirements would make the proposal economically unviable this should not in itself justify the relaxation by the decision maker of any obligations or requirements needed to secure the mitigation.	
4.14.5 **(Waste Management)**	The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a Site Waste Management Plan. The arrangements described and the Management Plan should include information on the proposed waste recovery and disposal system for all waste generated by the development, and an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation. The applicant should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that this is the best overall environmental outcome. The applicant must demonstrate that all waste produced by the facility will be managed in accordance with the waste hierarchy and that during construction, excavated soils and subsoils will, where possible, be re-used on site e.g., for the balancing of cut and fill.	The Applicant has prepared a CoCP (App. Doc. Ref.s 5.4.2.1 and 5.4.2.2) which includes at section 6.10 a Waste Management and Resource Use Plan which requires that materials being imported or removed comply with all necessary legislative requirements, and that resource efficiency is maximised throughout the construction process in line with the principles of the waste hierarchy. The Applicant has sought to minimise the volume of waste produced and the volume of waste sent for disposal and the design of the Proposed Development has in fact identified the reuse of more than 90% of the site-won material during the construction phase of the proposed WWTP. Additionally, it has been identified that during the construction of the proposed WWTP, 100% of the site won materials during the construction of the Waterbeach transfer pipeline, thus reducing the impact on the depletion of non-renewable resources. The CoCP Part A (App. Doc. Ref. 5.4.2.1) requires the appointed contractor(s) to prepare a Site Waste

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		Management Plan (SWMP) to implement management measures higher up the waste hierarchy.
4.15.2-4.15.3 **(Socio-economic)**	Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts during the construction, operation and decommissioning phases. This assessment could consider the following impacts; however, these suggestions are not exhaustive and other socio-economic impacts should be assessed if appropriate for the proposed development: • Regional and local socio-economic impacts associated with new waste water infrastructure may include the creation of jobs and training opportunities. The application should have taken into account the location of public rights of way, including footpaths, bridleways and byways and minimised hindrance to them where possible. • The changing influx of workers during the different construction, operation and decommissioning phases of the waste water infrastructure may alter the demand for services and facilities in the areas surrounding the proposed development.	The Applicant has assessed the likely socio-economic impacts of the Proposed Development as part of the ES. Chapter 11 Community of the ES (App. Doc. Ref. 5.2.11) sets out an assessment of the potential impacts arising from the Proposed Development on population, employment and economic activity, training opportunities, private property and housing, businesses, community facilities and open space and recreational impacts. Chapter 12 Health of the ES (App. Doc. Ref. 5.2.12) assesses the effects of the Proposed development on human health during construction and operation. It concludes that during construction and operation, the effects would not be significant. Chapter 3 Site Selection and Alternatives of the ES (App. Doc. Ref. 5.2.3) sets out how the preferred option for the proposed WWTP took into account a number of contributing factors including the potential impact on PRoW, cycleways and bridleways in order to avoid and minimise impacts as far as reasonably practicable.
4.15.4-4.15.5	Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and could also refer to how the	The Applicant has prepared an Initial Equalities Impact Assessment (App. Doc. Ref. 7.11) in respect of the

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	development's socio-economic impacts correlate with local planning policies. Socio-economic impacts may be linked to other impacts, for example the visual impact of a development is considered in (section 4.7) but may also have an impact on tourism and local businesses.	Proposed Development which assesses how different people will be affected by the Proposed Development. The assessment considers the potential impacts on people with protected characteristics as a result of changes to socio-economic factors attributed to the Proposed Development. The existing socio-economic conditions in the areas surrounding the Proposed Development are also set out in the report. This includes demographic profile of the area, along with maps to illustrate areas with disproportionate representation of people with protected characteristics to inform the impact assessment. The Proposed Development would result in a beneficial impact on the economy during construction through the provision of employment opportunities via both new and existing construction contracts. The effects of the Proposed Development on community receptors during operation are slight beneficial, as a result of the effect of formalising recreational opportunities provided as part of the Proposed Development (as set out in the LERMP (App. Doc. Ref. 5.4.8.14), and through the

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		provision of the Discovery Centre, which will provide a unique education experience for users. Further details in respect of measures to control any effects in relation to socio-economic impacts linked to temporary land use change (agricultural land and soils), air quality, health, landscape and visual changes, noise, odour, traffic and transport and water quality are detailed within Chapter 6: Agricultural Land and Soils (App. Doc. Ref. 5.2.6), Chapter 7: Air Quality (App. Doc. Ref. 5.2.7), Chapter 12: Health (App. Doc. Ref. 5.2.12), Chapter 17: Noise and Vibration (App. Doc. Ref. 5.2.17), Chapter 18: Odour (App. Doc. Ref. 5.2.18) and Chapter 20: Water Resources (App. Doc. Ref.5.2.20) respectively.
4.15.6-4.15.9	The applicant should undertake and include in their application an equalities impact assessment for the construction, operation and decommissioning phases. This will require an Initial Equalities Impact Assessment (EqIA) to identify potential adverse, differential or positive impact on equalities groups, and whether these are direct or indirect. If significant impacts are identified at the screening stage, a full Equalities Impact Assessment should be undertaken.	Please refer to the Applicant's response to paragraphs 4.15.4-4.15.5 above. The EqIA concludes that no adverse equality effects are expected as a result of the construction phase of the Proposed Development. During operation, there will be beneficial equality effects on PRoW as a result of improvements to the network. There will also be a beneficial effect on personal safety and security due to increased CCTV and lighting provision, differentially benefitting older people, disabled people, ethnic minority groups, men, women and LGBT+ groups. Finally, the

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	The applicant should identify which impacts have an adverse, differential or positive impact on particular equalities groups. The applicant should describe the existing demographics of the area surrounding the development which will show whether a disproportionate number of a particular equalities group will be affected by the generic impacts e.g. air emissions, other emissions, flood risk, noise, visual impacts, land use etc. The applicant should describe the equalities impact on people living, working or owning businesses who may be displaced as a result of the development. The applicant should also describe the indirect equalities impact of a loss of goods or services as a result of displacement.	inclusion of a discovery centre as part of the operational design will differentially benefit children and young people who will have access to a new educational resource.

Get in touch

You can contact us by:


Emailing at **info@cwwtpr.com**


Calling our Freephone information line on **0808 196 1661**

Writing to us at **Freepost: CWWTPR**


Visiting our website at [redacted]

You can view all our DCO application documents and updates on the application on The Planning Inspectorate website:

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