

Cambridge Waste Water Treatment Plant Relocation Project
 Cambridgeshire County Council Relevant Representations
 PINS Project Reference: WW010003

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1 Introduction

- 1.1 Throughout the pre-submission stage Cambridgeshire County Council has engaged with the Applicant in pre application discussions to help inform their proposal prior to the submission of their application.
- 1.2 Cambridgeshire County Council (CCC) has worked closely with the other host local authorities: Cambridge City Council and South Cambridgeshire District Council, through the Greater Cambridge Shared Planning Service. The authorities will continue to co-ordinate activities to best inform the Examination and avoid undue duplication.
- 1.3 Notwithstanding this, each authority is submitting their relevant representation on an individual basis to ensure that the Examining Authority (ExA) is fully informed of the matters of concern to those authorities and the communities and interests that they represent. This is particularly relevant, as during the Environment and Green Investment Committee it was noted that there continues to be much local concern as a result of these proposals, which includes the issue around deliverability of the project. Full access to the committee item can be accessed on the Council's recording¹.

2 Summary

- 2.1 Cambridgeshire County Council (CCC) officers have engaged in pre-application discussions with the Applicant to ensure that the final submission takes account of early concerns around the information and methodologies required to be able to fully assess their proposals. In the main this advice has been followed. However, as highlighted in the sections below, there are queries that need to be addressed to allow CCC to fully understand the impacts of the scheme and to form a view as to whether the mitigation measures proposed are sufficient.
- 2.2 The County Council seeks these matters to be resolved ahead of any consent being given to the scheme.

3 Agricultural land and Soils

- 3.1 The Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) contains Policy 24: Sustainable Use of Soils, which seeks to protect best and most versatile agricultural land and the soils that make that land so valuable for agriculture. The Council will seek soil resource is used sustainably and that a Management Plan is developed to ensure the proposed mitigation is delivered. Policy 24 also steers waste management development away from best and most versatile agricultural land, and the Council will be reviewing the design alternatives considered to ensure that land-take of the proposed development is minimised. Please note this includes consideration of ecology and landscape mitigation measures.

¹ https://www.youtube.com/watch?v=abWUKPsA_6E

4 Biodiversity

- 4.1 The scheme has been sensitively designed for biodiversity, taking on board comments raised at pre-application stakeholder biodiversity workshops with the Applicant. The Council considers that overall, a thorough ecological assessment has been undertaken. However, it has not been possible to review confidential documents in time for these Relevant Representations - the Council received unredacted versions from the Applicant close to the deadline. This includes badger reports. The Council has also asked for a copy of the Biodiversity Net Gain (BNG) spreadsheet, and associated maps, so that the Biodiversity Net Gain assessment can be fully reviewed.
- 4.2 The Environmental Statement (5.2.8 Environmental Statement - Volume 2 - Chapter 8 – Biodiversity) [APP-040] identifies potential adverse impacts on the following ecological receptors:
- a. wildlife sites: Stow-Cum-Quy Fen SSSI, River Cam County Wildlife Site (CWS), Allicky Farm Pond CWS, Low Fen Drove Way Grassland & Hedges CWS
 - b. habitats: veteran trees, hedgerows and other habitats
 - c. protected species: water vole, bats, badgers, notable plants
- 4.3 The Council is concerned that the documentation submitted doesn't demonstrate how these adverse impacts will be adequately mitigated / compensated as part of the scheme. Of particular concern is:
- a. Protected Sites - Habitat Regulations Assessment does not consider all Protected Sites
 - b. Stow-cum-Quy Fen SSSI – inadequate mitigation for adverse recreational and hydrological impacts
 - c. Low Fen Drove Way Grasslands and Hedges CWS – condition survey work hasn't been completed and not all impacts have been identified. Residual adverse impact from lighting scheme has not been addressed. Opportunities for enhancement to CWS have been missed.
 - d. River Cam CWS – inadequate assessment of impacts of discharging water into River Cam at new outfall. Further modelling of storm water events and details of surcharge from new treatment plant is required. Impacts of lighting during construction unknown. Insufficient evidence to demonstrate adequate mitigation during construction / operational phase.
 - e. Allicky Farm Ponds CWS – inadequate mitigation / monitoring of adverse hydrological impacts
 - f. Water Vole – insufficient evidence to demonstrate mitigation is adequate and can be delivered as part of the scheme
 - g. Bats – insufficient evidence to demonstrate impact of scheme on foraging / commuting bats
 - h. Biodiversity Net Gain – scheme does not adequately demonstrate how it will deliver no net loss and the proposed 20% BNG. Scheme is unlikely to deliver 20% BNG for river units.
 - i. Code of Construction Practice Part A [APP-068] does not provide protection for all ecological receptors during construction, as identified in the Environment Statement.

- j. Landscape, Ecological and Recreational Management Plan [APP-099] does not cover the entire scheme (confined only on the new waste treatment plant) and therefore, does not cover the mitigation and management of all receptors.
- k. No Construction Outfall Management Plan or Operational Outfall Management Plan have been submitted. It is not possible to determine if there will be adequate protection of biodiversity, or adequate mitigation / management for habitat loss associated with the outfall, water vole compensation, delivery of 20% Biodiversity Net Gain river units, monitoring programme for scour of River Cam (during storm events)
- l. Lighting Design Strategy [APP-072] does not completely remove adverse impact of lighting scheme from bats and Low Fen Drove Way Grassland & Hedges CWS. The level of lighting spill associated with the operational phase is also unclear, as well as what additional mitigation measure will be implemented at the new Waste Water Treatment Plant (WWTP).

4.4 The Council is concerned that the proposed draft DCO requirements do not effectively secure conservation of biodiversity, and seeks the following:

- a. Requirement 9 - Construction Environmental Management Plan(s) wording should include a detailed Construction Ecological Management Plan
- b. Requirement 11 - Landscape, Ecological and Recreational Management Plan should cover the entire scheme, including monitoring wildlife sites, compensation for habitat loss and protected species (e.g. water vole / badger / bats).
- c. Requirement 10 - Outfall: wording of Requirement 10 should better reflect the Applicants commitment to deliver 20% BNG for River units.

4.5 We support the Applicant's proposal to establish an Advisory Group prior to the landscape works commencing in order to advise on the detailed management and maintenance plan and review of the Landscape, Ecological and Recreation Management Plan. However, it is unclear how this will be delivered. The Council seeks an outline terms of reference document for the proposed group. Funding will also be required to be secured to support effective participation by key stakeholders, which should include representation from local groups.

5 Carbon

Environmental Statement - Volume 2 - Chapter 10 – Carbon [APP-042]

- 5.1 Cambridgeshire County Council declared a Climate Emergency in May 2019. The County's Climate Change and Environment Strategy 2022 recognises the opportunity to provide local leadership to tackling the climate crisis in Cambridgeshire. This new Strategy is our commitment to working for and with people, communities, businesses. This should be considered under Local Policy.
- 5.2 The carbon emissions for operation are presented for 30 years, which the Applicant states is based on the 30 year lifespan of the Landscape, Ecological and Recreational Management Plan [AAP-099]. It would be useful to clarify what will be likely to happen after 30 years being the site is expected to be retained indefinitely.

- 5.3 Decommissioning impact should include waste disposal as well as vehicle movements. Construction emissions should also include construction waste disposal, which is not mentioned in Table 2-3.
- 5.4 Operation phase emissions do not seem to have a baseline as part of Section 4.4 of Chapter 10 of the Environmental Statement. It would be useful to understand how the proposed operational emissions compare to those of the existing plant, which would probably be a more suitable baseline.
- 5.5 It is important to note that the emissions referred to in 4.4.6 and 4.4.7 could change depending on the electricity grid decarbonisation profile. This issue is mentioned in 5.1.5 and 5.1.6. Year one emissions will therefore not be representative of every year of operation. Furthermore, it would be helpful to clarify if the net emissions 'per year' referred to in 4.4.7 and Figure 4.3 (and in Table 5-1) – is equal to the figure for year 1, or for an average year across the 30 years?
- 5.6 When considering the entire lifetime of the plant, it would be helpful to understand alternatives to exporting gas to the grid considering the move to electrification of heating.

Environmental Statement Chapter 10 appendix 10.1 GHG calculations [APP-109]

- 5.7 We note some matters of detail would be helpful to clarify with the Applicant in relation to the tables before completing a review and commenting on this appendix.

6 Health

- 6.1 We support the approach taken to assess the impacts on human health. The Environmental Statement - Volume 2 - Chapter 12- Health [APP-044] is comprehensive and has taken a sound methodological approach. Appropriate data sources have been used including the Cambridgeshire Joint Strategic Needs Assessment (JSNA) Core Data Set, however there are other JSNA's which could have been referenced, for example "Transport and Health JSNA", "New Housing and the Built Environment JSNA".
- 6.2 There are concerns that the disruption to access to services, particularly education have not been consistently addressed. In Table 2-8 in the Environmental Statement Chapter 12 [APP-044], it states changes to road layout or volumes of traffic are unlikely to significantly affect access to education, and therefore scoped out of any further assessment. However, earlier in the Health Chapter it states "changes in access to local services (Fen Ditton School) - during construction" will be an effect. More information is needed to ensure a good access is maintained throughout the construction phase.
- 6.3 The Environmental Statement, Chapter 12, needs to include consideration of the "ventilation stack" which is to be installed on the existing site at the interception shaft. The impacts should be assessed for future residential receptors. It is unclear if the stack will be removed if/or when the site is redeveloped and therefore how long it will be in situ.
- 6.4 The impact on the Gypsy and Traveller population has not been addressed within the Environmental Statement, Chapter 12, instead referring to the assessment on this population within the Equalities Impact Assessment (EQIA) [APP-211]. The EQIA, however appears not to have consulted with this group directly.

- 6.5 The health impacts on construction workers, particularly access to healthy food, should be included as part of the Environmental Statement Chapter 12. It is likely that construction workers will source food from takeaway provision, probably from “burger vans” which long term is an unhealthy source of food.
- 6.6 The Council would seek further clarity regarding the decommissioning process and responsibility for decontamination of the site prior to redevelopment. The Health Chapter references the Decommissioning Plan [AAP-070], but some of the potential Health Impacts are either not clear or have not been addressed. Clarity is needed on the decommissioning timelines, i.e., how long is the decommissioning process, at what point does it start, and how long are the gaps between each stage. There are concerns that once the site is decommissioned there may be a considerable gap until the site is redeveloped. Disused sites such as this may become targets for theft, vandalism and general antisocial behaviour, this can lead to increased community perceptions of lack of safety. The Equalities Impact Assessment (EQIA) [APP-211] concludes that there are no equalities impacts, however the impacts on human health have not adequately been addressed.
- 6.7 Sections 6.2-6.5, 6.7-9, and 6.11-6.13 of the Decommissioning Plan [AAP-070] refers to the process of emptying the “tanks” on site and “punching holes in them to prevent water build up. The Environmental Statement, Chapter 12, Health, has not assessed if there are any human health impacts of leaving these tanks in place with the potential for leachate from said holes.
- 6.8 Section 6.15.4 of the Decommissioning Plan mentions the need for temporary odour control/scrubbers, the use of such controls has not been assessed within the Environmental Statement, Chapter 12, Health. In addition, the health impacts of the cleaning process e.g. through fugitive emissions and/or noise have not been assessed with the Health Chapter. In addition are there any human health impact during cleaning from (spray, odour etc.).

Equalities Impact Assessment [AAP-211]

- 6.9 The Council broadly supports the findings of the Equalities Impact Assessment (EqIA), however there are concerns that the consultation has not reached some stakeholder groups. The Traveller community is not included in Appendix 7.12.2 of the EqIA that lists the stakeholder groups identified and contacted. The Health Chapter of the Environmental Statement specifically states that any health impacts to this group are considered with the EqIA. Without specific consultation with this group it is difficult to have assurance that the Health Impacts have been adequately addressed. This group have some of the poorest health outcomes and have a lower life expectancy when compared to the rest of the local population.
- 6.10 Appendix 7.12.2 of the EqIA (Stakeholders relevant to the EqIA identified and contacted) lists the stakeholders consulted, there are concerns that a significant number of stakeholders did not respond, whilst individual responses are not within the gift of the applicant the EqIA has not given sufficient detail on the attempts made to gather views or if any other data/similar consultations could have been used as proxy measure to ensure relevant views were taken into account in preparation of the EqIA.

Appendix 12.1: Health Screening Document [AAP-111]

- 6.11 The Council welcomes a high level introduction to health within the context of an EIA as well as the consideration given to key documents such as South Cambridgeshire Supplementary Planning Guidance for HIAs and the Public Health England Health Impact Assessment in spatial planning 2021. The Council further welcomes the inclusion of the wider determinants of health as the full scope of health considerations within the HIA.

Health Evidence Review 12.2 [AAP-112]

- 6.12 The Council supports the review and has identified links between the environmental, social and economic health determinants and their health outcomes.

Appendix 12.3: Mental Wellbeing Impact Assessment (MWIA) [AAP-113]

- 6.13 The MWIA screening toolkit appears fit for purpose and well utilised. With regard to Annex A MWIA screening toolkit, the data appears to say that no further MWIA is required. However, the narrative in the supporting text suggests different. Clarification will be sought from the Applicant.

7 Historic Environment

- 7.1 The Council welcomes the approach to the mitigation of construction impacts on undesignated heritage assets of archaeological interest and the stated intention of agreeing the programme of work with the County Council's Historic Environment Team. Further work to define the scope of the archaeological investigation, the research objectives and outcomes of the programme of work will be necessary to ensure that this approach is appropriately targeted and effective.

8 Land Quality

- 8.1 Policy 5 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) identifies a number of mineral safeguarding areas on its associated Policies Map. Mineral Safeguarding Areas identify areas of mineral deposits, and Policy 5 seeks to promote prior extraction where possible. During the course of the Examination the Council will be seeking to ensure that best use is made of any sand and gravel incidentally extracted as part of the development.

9 Landscape and Visual Amenity

- 9.1 The Proposed Development will have a significant adverse impact on the landscape both visually (from both the new structures and lighting proposed), but also as a result of the traffic generated by the Development during operation along its new access road. The Byway Open to all traffic (No. 130/17 Horningsea) runs immediately to the north and east of the Proposed Development. It is relatively lightly used, but is appreciated for its wide open views of the surrounding countryside, particularly towards the fens to the east and south-east. The Council welcomes the proposed new dedicated Public Bridleway linking Low Fen Drove with Station Road, Stow-cum-Quy, and recognises that this may provide

some reasonable degree of compensation for users of the public rights of way (PROW) network and local communities. The Councils would prefer that this path was a Restricted Byway, as this would enable use by carriage drivers who have few facilities available in the area, and it would also confer equal rights for cyclists as for other non-motorised users (NMUs). However, details to ensure the delivery of a dedicated PROW is needed to avoid concerns being raised during the Examination. It will also help meet certain policy requirements of the Cambridgeshire Rights of Way Improvement Plan (ROWIP), National Planning Policy Framework (NPPF) paragraph 100, the Defra 25 Year Environment Plan, and the Cambridgeshire & Peterborough Joint Health and Wellbeing Integrated Care Strategy.

- 9.2 Noting the above, the Council consider that more could be done to offset the adverse impact on local communities, including provision for all NMUs being inclusive of equestrians along the B1047 over the A14 bridge into Fen Ditton, meeting the new Bridleways being delivered as part of the Marleigh housing development; Section 106 (s106) legal agreement monies for protection and enhancement of the existing PROW network in the vicinity of the proposed development; heritage interpretation boards; and a Community Fund to help support local community initiatives. The Councils would welcome early engagement with the Applicant to resolve these concerns by the close of the Examination.

10 Material Resources and Waste

- 10.1 The Council notes that a quantity of material will be excavated from the ground to construct the proposed Transfer Tunnel and that this will be used in landscaping around the proposed Water Recycling Centre. During the Examination the Council will be seeking to ensure that only material from the development is used in the landscaping and that inert material from other developments will not be required. If this were to occur it would change the policy context, and Policy 26 Other Developments Requiring Importation of Materials would be relevant. The Council wishes to ensure that the importation of inert material will not be required.

11 Noise and Vibration

- 11.1 The Council is generally satisfied that the noise and vibration assessment is robust and has used appropriate methodology, however there are concerns that the noise for the emergency generators has been scoped out.
- 11.2 There are also concerns that some assessments can't be adequately concluded as some of the fixed plant locations e.g. the pumping station have yet to be determined and confirmed. Further assessments will be needed to assure there are no impacts on human health from noise and vibration when the locations have been confirmed.

12 Odour

- 12.1 The proposed 10m (above ground level) permanent ventilation stack to the interception shaft, at the start of the wastewater transfer tunnel within the existing Cambridge WWTP, requires further consideration having regard to a future residential use of the site. From a planning perspective, notwithstanding the potential application of the NPPF's Agent of

Change Principle at any such point, planned odour controls should, from the outset, be such as to robustly protect residential amenity throughout the use of the infrastructure's operations. Paragraph 5.1.5 of the Preliminary Odour Management Plan [AAP-140] mentions controls 'expected' to be included. More certainty as to the necessary mitigations needed are sought. Further, the potential application/weight of Policy 18: Amenity Considerations, of the Cambridgeshire and Peterborough Minerals and Waste local Plan must be accounted for. The policy refers to how development proposals can be integrated effectively with existing or planned neighbouring development.

13 Traffic and Transport

DCO Order [APP-009]

13.1 The Highway Authority seeks that all works within the adopted public highway be agreed with the developer using Section 278 (S278) of the Highways Act 1980. This will require the developer to enter into appropriate S278 Agreements, with either a bond or cash deposit, pay the Highway Authority's inspection fees and any legal fees resulting from the works. Such measure will provide a suitable level of protection for the Highway Authority (and ultimately the citizens of Cambridgeshire) in the event of any difficulties being encountered in the future. This requirement will necessitate the DOC to be amended.

13.2 The Highway Authority already has two forms of S278 Agreement:

- I. The Formal Agreement. This is used when any land needs to be dedicated as adopted public highway (using Section 38 of the Highways Act 1980), when a formal Road Safety Audit is required and when the estimated value of the works is above £50,000.
- II. The Short Form Agreement. This is used for minor works under the value of £50,000. Given the current rate of inflation and nature of the works the Highway Authority would be content to see this figure increased to £100,000.

13.3 The Highway Authority already has precedent forms of both agreements and if their structure could be agreed as part of the DOC, this will significantly increase the speed at which the agreements can be issued and reduce the need for legal input from both sides.

13.4 Road Safety Audits (RSA): GG119 of the Design Manual for Roads and Bridges States:

5.46.1 A stage 1 RSA report should be undertaken before planning consent is applied for as this demonstrates that the potential for road user safety issues has been addressed.

The RSA Stage 1 for the main signalised access to the waste water treatment plant has been completed (25th November 2022), though no Designers Response has been provided so the process is incomplete.

Protective Provisions

13.5 The Protective Provisions for the highway authority are generally comprehensive. However, the County Council has the following concerns:

- 13.6 There is no mention of compensation to the Local Highway Authority (LHA) for possible damage to the highway network as a result of extraordinary levels of traffic – this could be particularly relevant during construction phases.
- 13.7 The timescales presented are not sufficient. The timeline for certification and provisional certification is set at 14 days, but this is not realistic as it would need to include a site inspection. The County Council requests 21 days.
- 13.8 The protective provisions do not appear to encompass any works that affect PROW. However, PROW are public highways governed by the same traffic management procedures. The Council would request that this provision is amended to explicitly refer also to PROW.

Street Works (Article 10 and Schedule 3)

- 13.9 The schedule should clearly state which streets are public highways and which are not.
- 13.10 The undertaker should be required to agree the timing and nature of its works with the LHA prior to commencement and submit Permits via DfT StreetManager in advance of any works on the public highway and / or any temporary closures or traffic management to enable the Highway Authority to co-ordinate the network.
- 13.11 It would be helpful for this article to explicitly linked to the protective provisions.

Alterations to streets (Article 11 and Schedule 4)

- 13.12 The schedule should clearly state which streets are public highways and which are not.
- 13.13 It would be helpful for this article to make direct reference to the protective provisions.

PROW (Article 13)

- 13.14 The undertaker should be required to issue CCC with a schedule of proposed temporary closures. Alternatively, this could be provided for within the Construction Traffic Management Plan (CTMP).
- 13.15 The undertaker should be required to seek CCC approval before enacting any closures. The Council would request that this be added to this article.
- 13.16 Article 13(4) covers creation of new PROW. The creation of new PROW should be subject to highway authority protective provisions like any other highway.

Accesses (Article 14)

- 13.17 The construction or alteration of any access that joins the highway should be covered by the Protective Provisions. It is not immediately clear that this is covered in the DCO. CCC should have the right under the DCO to approve the design, construction and completion of any new access, which includes the need for street lighting as part of the design.

Maintenance (Article 15)

13.18 There should be a 12 month maintenance period from the issue of the Provisional Certificate when the works are completed. Upon final certification the street works become highway maintainable at public expense.

Works Plans [APP-017]

13.19 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9001 Rev C02:

- i. This drawing is acceptable to the Highway Authority.

13.20 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9002 Rev C02:

- i. the 'highway works' elements should be separated out to clearly identify those areas under the control of the National Highway Authority and those under the control of the Local Highway Authority as these bodies may have differing requirements within the context of the DOC.

13.21 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9003 Rev C02:

- i. Discussions must be held with the Greater Cambridge Partnership to ensure that their proposed Waterbeach Greenway Project and the proposed Highway Works dovetail.
- ii. Note 2.i applies.

13.22 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9007 Rev C02:

- i. The use of the existing access at Gayton Farm will require some works within the existing adopted public highway and this area should be shown shaded tan.

13.23 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9008 Rev C02:

- i. The works to the existing adopted public highway at Grange Farm and S37 need to be separately identified and not conflated with off highway temporary works.

13.24 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9009 Rev C02:

- i. The works to the existing adopted public highway at Burgess Farm and Riverside Farm need to be separately identified and not conflated with off highway temporary works.

13.25 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9010 Rev C02:

- i. The works to the existing adopted public highway at Bannold Road, Burgess Drove and Long Drove need to be separately identified and not conflated with off highway temporary works.

General Arrangement Plans [APP-016]:

13.26 10. Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9031 Rev C01:

- i. Confirmation of any works to the existing Waste Water Treatment Plan access is requested.

- 13.27 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9033 Rev C01:
- i. Any proposed works to alter the alinement of the adopted public highway over the A14 Bridge need to be specifically identified on this plan
- 13.28 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9037 Rev C01:
- i. No works are shown at Gayton Farm, even if these are only shown indicatively it must be recognised that such works are likely to be needed.
- 13.29 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9038 Rev C01:
- i. The works to the existing adopted public highway at Grange Farm and S37 need to be shown. At present the General Arrangement Drawing is showing no additional works.
- 13.30 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9039 Rev C01:
- i. The works to the existing adopted public highway at Burgess Farm and Riverside Farm need to shown. At present the General Arrangement Drawing is showing no additional works.
- 13.31 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9023 Rev C01:
- i. The works to the existing adopted public highway at Bannold Road, Burgess Drove and Long Drove need to shown. At present the General Arrangement Drawing is showing no additional works.

Design Plans – Highways and Site Access [APP-025]

- 13.32 The plans should show more clearly that the access road to the site will not be a highway maintainable at public expense.
- 13.33 It is also important the Applicant uses the County Council's Highway Boundary data to ensure proposals can be delivered within the Local Highway boundary. This is available to the Applicant upon request. It is also important to distinguish between Local Highway from land owned by National Highways in the plans.
- 13.34 The Council objects to the proposed pedestrian and cycle facility currently proposed for the B1047 Horningsea Road. In meetings with the Applicant in 2022 the Council explained that this non-motorised user (NMU) facility should be inclusive of all NMUs including equestrians. Every effort should be made to accommodate for all NMU unless it can be demonstrated it is undeliverable. The Council also pointed out that it would be better for NMUs using the PROW network access via Low Fen Drove if this facility was on the eastern side of the B road, to avoid the need to cross this busy road. As noted under Landscape and Visual (Paragraph 9.2 above), this NMU facility offers an excellent opportunity to provide an important missing link in the bridleway network, helping to meet statutory ROWIP policy SoA2. It is therefore disappointing to see that no change has

been made. The Councils requests early engagement with the Applicant to resolve this matter.

- 13.35 Further detailed design of the access and improvements on Horningsea Rd. are needed including the locating and management of street furniture, including lighting. The narrowing of the verge on the eastern side of the A14 bridge is a concern as there is already experience of vehicles hitting poles and heads on this section. The narrowing also impacts the ability to maintain the signals without a full set of temporary signals and a lane closure.
- 13.36 Swept paths for HGVs are needing to be shown on the access plans to ensure street furniture is not vulnerable to being struck. Current street furniture is prone to poles being damaged by large vehicles making turns.
- 13.37 Overhead traffic signal detection should be the very first consideration in the detailed design. Inductive loops will only be considered where no other option is available.
- 13.38 The proposals as part of the application need to be aligned with that of the Horningsea Greenways scheme that is to deliver further improvements along Horningsea Road.
- 13.39 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9808 Rev C01:
- i. This drawing is acceptable in principle subject to detailed design and that raise above relating to provision for equestrian users.
- 13.40 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9809 Rev C01:
- i. The proposals within the existing adopted public highway are acceptable subject to detailed design. The Highway Authority will not adopt swales as a drainage solution.
- 13.41 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9810 Rev C01:
- i. The facility to the widened section of the bridge for non-motorised users will not solely be a cycleway and the term shared use, should be annotated. There were discussions re the use of this route by equestrians and these should be referred even if they proved to be impractical.
 - ii. It is doubtful that the proposed grass verge along the widened bridge section will establish or be successful, so an appropriate hard paved solution may be required.
- 13.42 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9811 Rev C01 and Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9812 Rev C01:
- i. These works are wholly off the existing or proposed adopted public highway.
- 13.43 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9813 Rev C01:
- i. The proposals are acceptable subject to detailed design.

Construction Traffic Management Plan (ES Vol. 4, Chapter 19, Appendix 19.7) [App-148]

- 13.44 From the Highway Authority perspective, the function of the Construction Traffic Management Plan (CTMP) is to control, and where possible mitigate the impact and interaction of construction traffic on the users of the adopted public highway. Furthermore, the impact on the fabric of the highway itself. The document needs to be more focused on these outcomes.
- 13.45 Paragraph 6.3.3 states “*These weight limits are Traffic Regulation Orders (TRO) and are therefore enforceable by Cambridgeshire County Council as the Local Highways Authority.*” The police authority enforces weight restrictions not the Local Highways Authority.
- 13.46 Installation of Automatic Number Plate Recognition (ANPR) cameras will be subject to the approval of Cambridgeshire County Council and will require the relevant licences being applied for by the applicant and approved by the County Council. ANPR equipment must meet current standards and data collected by the cameras must be managed / stored to ensure GDPR is complied with.
- 13.47 Installation and locations of any signage must be approved by the County Council.
- 13.48 Paragraphs 6.4 and 6.5. The proposed timeframes for deliveries etc. must be made explicit within the document. Given the traffic sensitive nature of the streets in question the Local Highway Authority seeks that demolition or construction vehicles with a gross weight in excess of 3.5 tonnes shall service the site only between the hours of 09.30hrs - 16.00hrs, seven days a week.
- 13.49 Paragraph 7.3.3 The applicant should provide details of suggested enforcement procedures (how many breaches before a company is removed from the works for instance). Having a more transparent procedure will give more confidence to the public that these matters will be effectively enforced.

Appendix 2.1 Code of Construction Practice Part A [APP-068]

- 13.50 Paragraphs 7.6.13 – 7.6.18 provides details of measures to be put in place to manage the impact upon users of the PRow during the construction period. Temporary closures should be a last resort and must be agreed with the LHA. Any alternative routes must be agreed with LHA Rights of Way Officer. Signage at appropriate decision points for public to be agreed with LHA.
- 13.51 The programme for works should be shared with LHA Rights of Way Officer.
- 13.52 Parish councils and local and statutory user groups as well as LHA should be included as part of the communication to local residents and businesses mentioned in paragraph 7.6.17.
- 13.53 Paragraph 7.6.18 describes PRowS will be restored to the same condition as before the works took place or to a standard which is acceptable to the Local Highway Authority.

Restoration to full legal width of the PROW is required. Condition surveys should be taken before works commence and should include boundary features as well as the surface. Provision should be provided for the LHA to make inspections.

Appendix 19.3: Transport Assessment

- 13.54 The Council would encourage the Applicant to review opportunities that would minimise the need for construction traffic through Waterbeach. This could include using or sharing routes with other nearby developments. It is also important to co-ordinate with other developments in the area such as the relocated Waterbeach railway station.
- 13.55 The Council also encourages the Applicant to review opportunities to minimise the construction traffic through Chesterton and using Fen Road level crossing which is known to be down for a high proportion of time.
- 13.56 The Council is broadly satisfied that the construction access routes are acceptable in terms of highway capacity. It is essential to ensure unnecessary movements are avoided through residential areas.
- 13.57 It is agreed that the only construction access point that needs modelling is the site access. However, it is noted that other access routes and junctions have been modelled. The Council will need to review the details of the modelling of these junctions and the highway layout and design of these works.
- 13.58 Traffic generation, this will have a negative impact on the network due to the additional traffic. However, the applicant has put forward a package of mitigation that includes the signalisation of the main access junction. Please note comments above in relation to further enhancements to the current proposals for non-motorised users on Horningsea Road.
- 13.59 The 50 cycle parking spaces seem appropriate for the potential 92 full time employees on the site at any time. Further detail will be needed on the location and layout of the cycle parking.
- 13.60 The Council will need to review whether there is a need for bus stops to be relocated on Horningsea Road to the pedestrians and cyclists site access.
- 13.61 The secondary mitigation details (Paragraph 2.7.23 and Table 2.8) are appropriate and relate to Travel Plans and construction good practice. CCC will need to review the details within these to ensure that they represent the best opportunity to reduce single occupancy travel by the workforce.
- 13.62 The network of traffic surveys (see Paragraph 4.2.36) undertaken had been agreed at the pre app stage with the applicant.
- 13.63 The collision analysis (see paragraph 4.2.40) covers the agreed area during the pre application stage and the findings detailed are agreed. The only cluster of collisions in the Waterbeach area is noted to be at the junction of the A10 with Denny End Road. The layout of this junction has recently been improved which may reduce the number of collisions in the future. These works were completed as part of Waterbeach New Town.

- 13.64 It is noted that modelling has been undertaken for the Milton interchange and this will be reviewed and CCC to comment accordingly during the Examination. The construction traffic volume is not expected to cause a network issue but this will be assessed by CCC. This is because construction traffic movements are to be restricted during peak times, when the highway network is at its busiest. The modelling scenarios have been agreed with CCC at the pre application stage. CCC will undertake a detailed review for each of the junctions modelled, of the modelling scenarios, assumptions outputs and model details and will respond accordingly.
- 13.65 The flows from construction and operation were set out at the pre application stage. The impact of the flows on the network will need to be checked, including the modelling for the main access junction, and the other junctions modelled.

14 Water Resources

- 14.1 Paragraph 3.4.3 of the Flood Risk Assessment [APP-151] indicates that any drainage exceedance event would be contained within the boundary of the site, which is acceptable in principle, however it must be clear that there will be safe access and egress in times of flood or have suitable flood evacuation plans. This is equally a concern if there is any risk of overland flows being captured within the depression of the site.
- 14.2 It is important Cambridgeshire County Council as the Lead Local Flood Authority (LLFA) retains a role in consenting any structures in watercourses under the DCO and that sufficient protective provisions are put in place.
- 14.3 7.1.5 of the Flood Risk Assessment [AAP-151] indicates that if groundwater emerges at the surface it will be managed as part of the surface water strategy. Calculations need to show the volume of groundwater accounted for in the Surface Water Drainage Strategy.
- 14.4 Clarity should be provided on the meaning of “water returned to the head of the system for treatment” for the potentially contaminated water. (Environmental Statement, Chapter 20, Water Resources, [AAP-052] Pp45 Table 2-6: Primary and tertiary mitigation measures relating to water resources adopted as part of the Proposed Development). Whilst the LLFA is not opposed to the principle, as this reduces the risk of pollution to the surrounding watercourse network, clarity should be provided on whether this is the foul treatment works or head of a surface water treatment system. If this is the former, then it should be clear that there is capacity in the design of the system to take the proposed increase in foul water, as well as the critical storm in times of contamination from all surfaces.
- 14.5 It is not clear why a 20Ha area has been used for the calculation of the discharge rate as the area draining through areas 3 and 7 only totals 12.4Ha, as set out in Table 4-1 of the Environmental Statement Chapter 20, Water Resources [AAP-052]. This needs to be relevant to only the drained areas.
- 14.6 The rainwater harvesting tank will need to have the overflow connected to a viable point of discharge. It is noted in paragraph 4.8.3 of the Drainage Strategy (Appendix 20.12) [APP-162] that it is to be self-contained or overflow to a soakaway. The rainwater harvesting is supported as an inclusion; however, this should not be treated as

attenuation storage and the system will need to accommodate any runoff from these roofs.

- 14.7 The proposed runoff from the access road may require an additional stage of treatment if this is to be utilised by larger vehicles to ensure that all water is suitably treated before discharge.
- 14.8 A detailed drainage layout plan should be submitted to clearly show the extent of drained areas within the WWTP area. The proposed extent of permeable paving, discharge locations, attenuation facility etc covering all surfaces of the proposed system should all be included on the drainage layout plan.
- 14.9 Volumetric hydraulic calculations should be clearly submitted showing the required volume of attenuation required in the 100%, 3.3% and 1% Annual Exceedance Probability (AEP) storm events, including climate change allowances on the 3.3% and 1% AEP storms. This should include the use of FSR rainfall data for the 15 and 30 minute storms and FEH rainfall data for storms of 60 minutes or greater.

15 Other Documents

- 15.1 The Council may raise further comments on the Planning Statement and other documents as part of the application through the Local Impact Report.

END