



**Anglian Water
Services Ltd**
Lancaster House
Lancaster Way
Ermine Business Park
Huntingdon
PE29 6XU

Tel 01480 323000
www.anglianwater.co.uk

Our ref

Your ref WW010003

██████████
Casework Manager
National Infrastructure
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

29th September 2023

**Cambridge Waste Water Treatment Plant Initial Response to WW010003-000815
Procedural Decision 10th of August 2023**

Application Ref: WW010003

Dear Deborah,

I am writing further to our letter of 08th September and confirming our submission of additional information and updated documentation as requested in response to the Examining Authority's (ExA's) Procedural Decision published by the Planning Inspectorate on the 10th of August 2023.

The Applicant notes the ExA's comments in the Rule 6 Letter in respect of the Applicant's submissions of 18 July and as requested, the Applicant has included in its submissions of 29 September in response to the Procedural Decision all of those documents submitted on 18 July in the formats requested by the ExA. Those versions have been consolidated with the updates made to address the matters identified by the ExA in its Procedural Decision. All changes to the documentation are summarised in the table below and in the updated 'Guide to the Application', document APP-003 which contains all document references and version numbers.

Planning Inspectorate ID	Overarching topic	Applicant's initial response
1	Transport Assessment (TA) [APP-143]	The Applicant notes the matters raised and has undertaken a full review of the Transport Assessment to address the comments and has included an updated version in the Procedural Decision submission.



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		A single version of the Transport Assessment has been provided so the document can be assessed as a single report, however this means the assessment is 172mb therefore a version split into three parts has also been provided for publishing on the website.
2	ES Chapter 19: Traffic and Transport [APP-051]	Requirement 19 of the dDCO secures the approval and implementation of the Operational Logistics Traffic Plan. The Applicant has amended the wording of the dDCO to refer to "Traffic" instead of "Travel".
3	Construction Traffic Management Plan (CTMP) [APP-148]	The Applicant notes the omission of Figure 3.1 from the CTMP, the CTMP has been updated to include a revised version of Figure 3.1.
4	Road Safety Audit (RSA)	The Road Safety Audit (RSA) has been produced which covers the permanent site access and A14 overbridge changes. This was issued to the relevant stakeholders on the 7 th of August 2023 and we have received comments from National Highways who confirm that in principle they have no concerns with the RSA but have raised further queries for example, confirmation of the parapet height to the bridge and asked for further clarification on technical issues. The Applicant responded to these requests on 25 September 2023. A copy of the RSA is provided with this Procedural Decision submission. The Applicant continues to engage with Cambridgeshire County Council on the RSA and has provided the Designers Response.
5	ES Chapter 3: Site Selection and Alternatives [APP-035]	The figure error has been corrected and is included in this Procedural Decision submission. The Applicant has also consistency checked with option 3 shown in consultation material, document reference APP-181 which we believe was incorrectly stated in the Procedural Decision Letter as APP-081.
6	ES Chapter 11: Community [APP-043]	The Applicant notes the matters raised and has undertaken a full review of Chapter 11 and the figures referenced IDs 6.e to 6.g and has addressed the comments. Note that the referenced Figure 19.1 is intended to show differences between footpath, byway and bridleway. The Figures in Appendix 19.3 of

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		the Transport Assessment (App Doc Ref 54.19.3) are a different scale and labelled to show the individual PRow.
7	ES Appendix 12.3: Mental Wellbeing Impact Assessment [APP-113]	The Applicant notes the comments made regarding Annex A. Content is provided in Annex A of this appendix within Tables A.2 – A.6. Minor edits to the front section 1, 5 and 6 of Annex A are provided in the Procedural Decision submission.
8	Planning Statement [APP-204]	<p>The Applicant notes the matters raised and has undertaken a full review of the Planning Statement to address the comments.</p> <p>The Applicant has also provided the legal submission requested in the Procedural Decision submission (Document 7.15).</p>
9	Book of Figures – Agricultural Land and Soils [APP-055]	The Applicant notes the matters raised and has undertaken a full review of the Book of Figures to address the comments and an updated version is provided in the Procedural Decision submission of 29 th September.
10	Historic Environment	The Applicant notes the matters raised and has undertaken a full review of Chapter 13: Historic Environment, Book of Figures – Historic Environment and the Gazetteer of Assets to address the comments.
11	Landscape and Visual	The Applicant notes the matters raised and has undertaken a full review of Chapter 15: Landscape and Visual Amenity, Viewpoints, the LERMP and NPSWW to address the comments.
12	Draft Development Consent Order	The Applicant notes the comments made and has undertaken a full review of the dDCO to address the comments. An updated dDCO is submitted in the Procedural Decision submission on 29 th September together with a DCO Tracker (Document 2.4) explaining the changes the Applicant has made in responding to the items raised in the ExA's Procedural Decision. The Applicant has also made some other minor changes as are explained in the DCO tracker.
13	Noise and Vibration	The Applicant notes the comments made and has rectified the formatting error within the Baseline Noise Report .

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14	Mitigation Tracker & Commitments Register	<p>The Applicant notes the issue raised within the Mitigation Tracker [APP-073] and has rectified so that it is searchable by keyword. The updated version also contains revisions to improve clarity and accessibility. The Commitments Register, sets out commitments made during consultation which do not constitute mitigation as identified in the Environmental Statement . This is provided in the Procedural Decision deadline of the 29th of September (Document 7.10).</p> <p>In addition to the mitigation set out in the Code of Construction Practice Part A, the Applicant intends to submit an additional management plan to set out the mitigation proposed in the Water Resources Chapter of the Environmental Statement in relation to the monitoring of water quality and risk of ground water contamination. This plan will be entitled the Outline Water Quality Monitoring Plan and is currently with the Environment Agency for approval before this is submitted. An additional Requirement has been inserted into the draft DCO to secure the delivery of this plan once it is approved.</p>
15.a	Statement of Reasons [APP-012]	Figure 1.1 is updated and is resubmitted in this Procedural Decision submission.
15.b	Statement of Reasons [APP-012]	The Applicant notes the comments made and has updated the legislation reference.
16	Biodiversity	<p>The Applicant notes the matters raised and has undertaken a full review of Chapter 8: Biodiversity and associated figures to address the comments.</p> <p>The Preliminary Ecological Appraisal is provided with the Procedural Decision submission.</p>
17	Water Resources	<p>The Applicant notes the comments made and has undertaken a full review of the appendices to address the comments.</p> <p>There are five new reports relating the Land Quality 17b and 18 below (Appendices 14.6 to 14.9) these reports were produced externally and have been secured via password. They are included in this Procedural Decision submission, however, unfortunately we have been unable to obtain fully</p>

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		<p>editable versions of these reports and have therefore been unable to add the DCO Application front and rear covers.</p>
18	ES Chapter 14: Land Quality [APP-046]	<p>The Applicant notes the comments made and has undertaken a full review of Chapter 14: Land Quality to address the comments.</p>
19	Outline Management Plans	<p>For references 19.b to 19.h the Applicant is submitting a Mitigation Architecture figure (Figure 2.1 in the Mitigation Tracker (Doc 5.4.2.7)[APP-073]) to explain the relationship between the management plans more clearly. The level of detailed provided within the CoCP is of sufficient detail to aid the understanding of the mitigation measures proposed for the construction phase. A framework Construction Environmental Management Plan (CEMP) setting out the structure of the CEMP is provided in the Procedural Decision submission.</p> <p>An Outline Outfall Management and Monitoring Plans, Operational Logistics Traffic Plan, Carbon Management Plan and a Framework Archaeological Investigation Mitigation Strategy are also provided in the 29th of September Procedural Decision submission.</p> <p>Regarding the Archaeological Investigation Mitigation Strategy, a framework is provided as an outline of the scope and content of the strategy, a draft version of the detailed strategy is being prepared and will be shared with the relevant stakeholders (Cambridgeshire County Council Historic Environment Team, Historic England), and through the Statement of Common Ground (SOCG) process an agreement on the mitigation strategy will be reached.</p> <p>The Cambridgeshire County Council Historic Environment Team ('CHET') have indicated that they will prepare an Archaeological Brief which will describe their requirements. This document will sit as an appendix to the AIMS.</p>

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20.a	Habitats Regulations Assessment (HRA) Report - A HRA Screening Report [APP-100] containing the information referred to in the Schedule of Amendments [APP-008] should be supplied.	An updated HRA which reflects the changes as set out in the Schedule of Amendments is resubmitted with this Procedural Decision submission.
20.b	Environmental Statement (ES) - please check the following documents: <ul style="list-style-type: none"> • ES Chapter 3, Figures 3.1 and 6.1 to 6.4 (Doc 5.2.3) are embedded in the text and the background mapping and text is indistinct. • ES Chapter 5 [APP-037] refers to a "Commitments Register" (ref 7.10). The Schedule of Amendments [APP-008] indicates this should refer to the Mitigation Register [APP-073]. 	<p>The figures referenced in ES Chapter 3 are updated and included with this Procedural Decision submission.</p> <p>Reference to the Commitments Register is updated to instead reference the Mitigation Tracker within Chapter 5 of the ES, the revised Chapter 5 is resubmitted with this Procedural Decision submission.</p> <p>All other updates are included in the Procedural Decision submission on 29th September.</p>
20.c	General comments / errors and omissions - please check the documents carefully for errors in text, headings, document names, and correct use of terms in	<p>The Consents and Other Permits Register is updated to correct legislation references, the updated version is submitted as part of this Procedural Decision submission.</p> <p>The first page of Appendix 6.1.5 is updated.</p>

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	<p>relation to legislation. For example, a few minor errors remain in the Consents and Other Permits Register [APP-200], such as, 'ecology protected species' rather than 'European protected species' (in several places), and 'The Wildlife Act 1981' rather than 'The Wildlife and Countryside Act 1981'. Appendix 6.1.5 of the Consultation Report [APP169] is given the title Application Document Reference 6.1.4 on the first page of the document.</p>	<p>Remaining DCO application documents have been checked for formatting errors or omissions, documents which required amendment are included in the Procedural Decision submission on 29th September.</p>
20.d	<p>Works Plan [APP-017] - Within Sheet 11 of the Works Plan [APP-017] west of Work No. 6, a plot is shown as 'Future Works' without a work number.</p>	<p>The area identified for 'Future Works' is not intended to have a separate work number.</p> <p>The area identified on the works plans as 'Future Works' falls within Work No. 23 (landscaping and ecological works) and therefore those works listed in Schedule 1 of the DCO such as earthworks and ground re-profiling may be carried out on this land. It is also intended that the "Further Works" described in Schedule 1 of the DCO might be undertaken on this land where necessary (such as fencing, temporary construction works etc.).</p> <p>The area is also separately identified on the Works Plans as accommodating 'Future Works' because this area is not specifically required for the other named works described in the DCO, but it may accommodate the expansion of the treatment works within the earth bank through future modification, enhancement or optimisation as explained in the Project Description Chapter of the Environmental Statement (Document Reference 5.2.2) (see paragraphs 2.15.3 – 2.15.5) and</p>

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		the Planning Statement (Document Reference 7.5) (see paragraphs 1.3.3, 1.7.4, 2.2.14 and 4.8.12).
20.e	<p>Land Plan [APP-018] and Book of Reference [APP-014] - Descriptions of plots in the Book of Reference [APP-014] could be improved, for example:</p> <ul style="list-style-type: none"> • 003b (missing 'Cowley Road') • 071d (should be southeast instead of east) • 022n (should be B1047 Horningsea Road and A14 where they meet – not described overly well) • 025b (should include reference to junction 34) 	The Applicant has taken on board the suggested amendments to the Book of Reference and can confirm that the changes are made in the updated submission of the Book of Reference with this Procedural Decision submission.
20.f	Previous Section 51 Advice - the Applicant is further advised to refer to Section 51 advice previously provided by the Planning Inspectorate on 22 September 2022 and 9 March 2023.	The Applicant considers that it has addressed the comments raised in the previous Section 51 Advice and has submitted updated documents in this Procedural Decision submission on 29 th September.
21	Legal Agreement(s)	The Applicant is currently proposing two Section 106 Agreements. The first to address perceived concerns over parking on Low Fen Drove Way, and the second containing provisions related to antisocial behaviour. Drafts of the Section 106 Agreements are provided in the Procedural Decision submission on the 29 th of September. Engagement with relevant parties on the drafting is ongoing.

The Applicant believes we have now responded with the updated evidence as requested in the Procedural Decision Letter of 10th August 2023.

Should you have any questions please do not hesitate to contact me.

Yours sincerely



Karen Barclay
Head of Major Infrastructure Planning & Stakeholder Engagement



Registered Office
Anglian Water Services Ltd
Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
Cambridgeshire. PE29 6XU
Registered in England
No. 2366656.

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