

Application by Anglian Water Limited for an Order Granting Development Consent for the Cambridge Waste Water Treatment Plant Relocation project

The Examining Authority's written questions and requests for information (ExQ1)

Issued on 24 October 2023

The following table sets out the Examining Authority's (ExA) written questions and requests for information – ExQ1. If necessary, the Examination timetables enable the ExA to issue further rounds of written questions in due course. If this is done, the further rounds of questions will be referred to as ExQs with a number to denote the number of the round.

Questions are set out using an issues-based framework derived from the Initial Assessment of Principal Issues provided as Annex C to the Rule 6 letter of 19 September 2023. Questions have been added to the framework of issues set out there as they have arisen from representations and to address the assessment of each application against relevant policies.

Column 2 of the table indicates who each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, either providing a substantive response or explaining why the question is not relevant to them. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Each question has a unique reference number which starts with a number (indicating that it is from an ExQs round of that number) and then has an issue number and a question number. For example, the first question on 'General and cross topic issues' in this round of questions is identified as ExQ1.1.1. When you are answering a question, please start your answer by quoting the unique reference number.

Responses should be sent to the [mailbox](#) for the Examination. If you are responding to a small number of questions, answers in an email or a letter will suffice. If you are answering a larger number of questions, it will assist the ExA if you use a table based on this one to set out your responses. An editable version of this table in Microsoft Word is available on request from the Case Team.

Responses are due by **Deadline 1: Monday 20 November 2023**.

Abbreviations used

A	Article	LDS	Lighting Design Strategy
AAP	Area Action Plan	LERMP	Landscape, Ecological and Recreational Management Plan
AIA	Arboricultural Impact Assessment	LIR	Local Impact Report
AIL	Abnormal Indivisible Load	LLFA	Lead Local Flood Authority
ALC	Agricultural Land Classification	LOAEL	Lowest Observed Adverse Effect Level
AQMA	Air Quality Management Area	LVIA	Landscape and Visual Impact Assessment
AWS	Anglian Water Services	M	Metres
BMV	Best and Most Versatile	m³	Metres cubed
BNG	Biodiversity Net Gain	MHCLG	Ministry of Housing, Communities and Local Government
BOD	Biological Oxygen Demand	MoD	Ministry of Defence
BoR	Book of Reference	MWIA	Mental Wellbeing Impact Assessment
CA	Compulsory Acquisition	NB	Northbound
CC	County Council	NCSC	National Cyber Security Centre
CCA	Cambridge City Airport	NE	Natural England
CCC	Cambridge City Council	NEC	North-East Cambridge
CCoC	Cambridgeshire County Council	NEP	National Environment Programme
CCTV	Closed Circuit Television	NH	National Highways
CEAS	Cambridge Eastern Access Scheme	NO₂	Nitrogen Dioxide
CEMP	Construction Environmental Management Plan	NO_x	Nitrogen Oxides
CHP	Combined Heat and Power	NPPF	National Planning Policy Framework
CNI	Critical National Infrastructure	NPPW	National Planning Policy for Waste
CoCP	Code of Construction Practice	NPSWW	National Policy Statement for Waste Water
COMAH	Control of Major Accident Hazards Regulations 1999	NSIP	Nationally Significant Infrastructure Project
CPNI	Centre for the Protection of National Infrastructure	NT	National Trust
CSO	Combined Sewer Overflow	NTS	Non-technical Summary (of the ES)
CTMP	Construction Traffic Management Plan	OHID	Office for Health Improvement and Disparities
CWS	County Wildlife Site	OLTP	Operational Logistics Traffic Plan
CWTP	Construction Workers Travel Plan	OMMP	Outfall Management and Monitoring Plan



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CWWTP	Cambridge Waste Water Treatment Plant	OMP	Odour Management Plan
CWWTPR	Cambridge Waste Water Treatment Plant Relocation	oSMP	outline Soil Management Plan
DAS	Design and Access Statement	OWTP	Operational Workers Travel Plan
dB	Decibel	PA2008	Planning Act 2008
DCLG	Department for Communities and Local Government	PCU	Passenger Car Unit
dDCO	Draft Development Consent Order	PDF	Portable Document Format
DCO	Development Consent Order	PE	Population Equivalent
DEFRA	Department for Environment, Food and Rural Affairs	PICP	Pollution Incident Control Plan
DLUHC	Department for Levelling Up, Housing and Communities	PM_(x)	Particulate Matter (size in microns)
DM0	Delivery Milestone Zero	PRoW	Public Rights of Way
DMP	Decommissioning Management Plan	R	Requirement
DoS	Degree of Saturation	RES	Recycling Environmental Services
DSEAR	Dangerous Substances and Explosive Atmosphere Regulations 2002	RR	Relevant Representation
ECoW	Ecological Clerk of Works	RSA	Road Safety Audit
EA	Environment Agency	RWCS	Reasonable Worst Case Scenario
EEAST	East of England Ambulance Service NHS Trust	SAC	Special Area of Conservation
EIA	Environmental Impact Assessment	SB	Southbound
EM	Explanatory Memorandum	SCDC	South Cambridge District Council
EMS	Environmental Management System	Sch	Schedule
EqIA	Equalities Impact Assessment	SMP	Soil Management Plan
ES	Environmental Statement	SOAEL	Significant Observed Adverse Effect Level
EV	Electric Vehicle	SoCG	Statement(s) of Common Ground
EWCA	His Majesty's Court of Appeal in England	SoS	Secretary of State
ExA	Examining Authority	SoR	Statement of Reasons
FRA	Flood Risk Assessment	SSSI	Site of Special Scientific Interest
FS	Funding Statement	STC	Sludge Treatment Centre
GCLP	Greater Cambridge Local Plan	SWMP	Site Waste Management Plan



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GCSPS	Greater Cambridge Shared Planning Service	tCO₂e	Tonnes of Carbon Dioxide Equivalent
GPS	Global Positioning System	TA	Transport Assessment
HART	Hazardous Area Response Teams	TCPA	Town and Country Planning Act 1990
HDD	Horizontal Directional Drilling	TP	Temporary Possession
HDV	Heavy Duty Vehicle	TRICS	Trip Rate Information Computer System
HEMS	Helicopter Emergency Medical Services	UKHSA	UK Health Security Agency
HGV	Heavy Goods Vehicle	VP	Viewpoint
HIF	Housing Infrastructure Fund	WAML	West Anglia Mainline
HRA	Habitats Regulations Assessment	WTBCN	Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire
HSE	Health and Safety Executive	WHMP	Wildlife Hazard Management Plan
IED	Industrial Emissions Directive	WINEP	Water Industry National Environment Programme
IEMA	Institute of Environmental Management and Assessment	WMPE	Waste Management Plan for England
IP	Interested Party	WWTP	Waste Water Treatment Plant
J	Junction	ZTV	Zone of Theoretical Visibility
km	Kilometres		

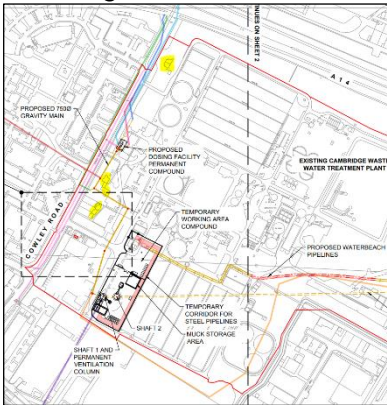
The Examination Library

References in these questions set out in square brackets (e.g. [APP-010]) are to documents catalogued in the [Examination Library](#). The Examination Library will be updated as the Examination progresses.

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ExQ1	Question to	Question
1. General and Cross Topic Questions		
1.1	Applicant	<p>Plans and Documents</p> <p>Please provide a list of all plans and other documents that will require Secretary of State (SoS) certification (including plan / document references) should the application be consented. This should be updated throughout the examination process for ease of tracking document versions and a final list supplied to the Examining Authority (ExA) before the close of the examination.</p>
1.2	Applicant	<p>Plans and Documents</p> <p>Figure 1.1 of Guide to the Application [AS-138] refers to “Main construction (first phase)” and to “Extension – 2nd phase (from 2036)”. Please provide a drawing indicating the extent of each phase.</p>
1.3	Applicant	<p>Plans and documents</p> <p>Cambridgeshire County Council’s (CCoC) Relevant Representation (RR) [RR-001] sets out a number of issues relating to the Works Plans [AS-150], the General Arrangement Plans [AS-149] and the Design Plans – Highways and Site Accesses [APP-025]. Please address these matters and update the plans as necessary.</p>
1.4	Applicant	<p>‘Future works’</p> <p>Regarding the ‘Future Works’ as shown on Sheet 11 of the Works Plans [AS-150]:</p> <ol style="list-style-type: none"> Are these related to ‘Phase 2’, and what specifically would these works involve; Does the draft Development Consent Order (dDCO) provide for them to be implemented and make it clear what the works would be; and Have the works been taken into account in all relevant assessments?
1.5	Applicant	<p>Legal agreements</p> <p>Paragraph (para) 57 of the National Planning Policy Framework (NPPF) states that planning obligations should only be sought where they meet all of the following three tests:</p> <ul style="list-style-type: none"> Necessary to make the development acceptable in planning terms. Directly related to the development. Fairly and reasonably related in scale and kind to the development. <ol style="list-style-type: none"> Please provide evidence that the proposed s106 agreements [AS-127 and AS-134] meets these tests; Confirm whether the matters outlined in the s106 Heads of Terms are backed up, or justified, by planning policy (including National Policy Statement for Waste Water (NPSWW) and development plan(s) policy) and / or supplementary planning documents? Could the matters outlined in the s106 Heads of Terms be secured by way of a dDCO Requirement (R)? Without the s106 agreements, would there be a harmful effect?
1.6	Applicant	Legal agreement

		CCoC's RR [RR-001] refers to potential s106 agreements relating to PRoW improvements, heritage interpretation and a Community Fund. Has the Applicant considered this and would it be willing to enter into such agreements?
1.7	Applicant	<p>Clarification of receptors for purposes of the assessments</p> <p>The image below is from Sheet 1 of the General Arrangement Plans [AS-149]:</p>  <p>The properties highlighted in yellow have the visual appearance of residential properties. Please confirm their lawful planning use. If they are residential properties, please confirm whether the impacts of the Proposed Development on these properties have been taken into consideration within the ES, notably in relation to noise and vibration and odour.</p>
1.8	Applicant	<p>Other consents and licences</p> <p>The consents and permits document [AS-123] confirms that other consents, licences and permits would be required for the Proposed Development. Please provide an update on any progress with obtaining these consents, licences and permits include a section providing an update on them in any emerging Statements of Common Ground (SoCG) that are being drafted with the relevant consenting authorities.</p>
1.9	Applicant	<p>Other consents and licences</p> <p>Appendix A, Table 1.1 relating to noise [AS-123] suggests that s61 consent may be needed in relation to noise during construction, and that the Applicant is <i>Not seeking to disapply this consent within the DCO</i>. However, it goes on to say that <i>...the DCO does include a statutory defence and disapplies s61(9) COPA 1974</i>. Please clarify.</p>
1.10	Applicant	<p>Other consents and licences</p> <p>Appendix A, Table 1.1 [AS-123] indicates that the Applicant would need to seek Building Regulations approval for some aspects of the Proposed Development, such as the Gateway building. However, this entry also appears to state that the Applicant is seeking to disapply such consent (seemingly through Schedule 17 para 3 of the dDCO). Please clarify this matter.</p>
1.11	Applicant	<p>Other consents and licences</p> <p>CCoC's RR [RR-001] refers to a need for agreements under s278 of the Highways Act 1980. Should this be added to the consents and permits document [AS-123]?</p>
1.12	Applicant	<p>Significant Effects</p> <p>Please provide a summary table listing all residual likely significant effects identified within the ES chapters.</p>

1.13	Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC)	Planning applications Please provide an update on any planning applications that have been submitted or determined since the DCO application was submitted that could either affect the Proposed Development or be affected by the Proposed Development and whether these would affect the conclusions reached in the ES.
1.14	CCC, SCDC Cambridgeshire County Council (CCoC), Interested Parties (IPs)	Other Projects and Proposals Are there any other projects that are not documented in the ES that are relevant and need to be considered by the ExA? If so, please identify these projects and the public information source(s) from which you have made your assessment that they are relevant.
1.15	Applicant, CCC, SCDC	Previous planning applications – Waste Water Treatment Plant (WWTP) Relocation Please provide details of any planning applications submitted previously regarding a potential move of the existing WWTP to the proposed site or any other site, as alluded to in some RRs (e.g. [RR-121, RR-304 and RR-178]). Please include full details of what was proposed, the outcome of the application and full reasoning behind the decision made.
1.16	Applicant, CCC, SCDC	Potential conflicts of interests A number of RRs (e.g. [RR-194, RR-225 and RR-262]) suggest CCC's and SCDC's involvement in the Examination gives rise to a conflict of interest given land interests and desire for the redevelopment of the existing WWTP site and wider area. Please comment on this.
1.17	Applicant	Associated development The 'Guidance on associated development applications for major infrastructure projects' (DCLG 2013) and in particular para 5(i) states that associated development should either support the construction or operation of the principal development, or help address its impacts. Please explain how the Discovery Centre, the amount of office space, amount of parking and the workshop meet these criteria.
1.18	Applicant	Project scope and cumulative assessment Given that there is a clear link between the Proposed Development and the demolition, remediation and redevelopment of the existing WWTP site (as mentioned in a number of application documents): a) Further justify your view that for the purposes of ES Chapter 22 cumulative assessment [AS-044], these works fall under Tier 3; b) Further justify the limited level of detail provided in section 3.9 of the cumulative assessment [AS-044]; c) Noting some RRs (e.g. [RR-051]), please explain how, without more detailed information in this regard, the information provided meets the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (such as section 4(2));

		<p>d) Noting reference (e.g. in [APP-008]) to the Court of Appeal's recent judgement in R. (oao Ashchurch Rural Parish Council) v Tewkesbury Borough Council [2023] EWCA Civ 101, please address the implication of this judgment for the application and the sufficiency of information provided;</p> <p>e) Notwithstanding the above judgment, para 3.1.3 of NPSWW requires the weighing of adverse impacts against benefits – please signpost to where in the application documents the adverse impacts of any housing development are identified and then weighed against the reported benefits of housing; and</p> <p>f) Explain why the activities that would be required to remediate and prepare the existing WWTP site for development have not been included in the dDCO and ES assessments.</p>
1.19	Applicant	<p>Cumulative assessment ES Chapter 22, para 4.1.27 [AS-044] indicates that work is continuing to inform the assessment of cumulative effects with the Waterbeach Station development. Please provide an update, including in relation to the co-ordination of the proposed early works to tunnel beneath the Cambridge-King's Lynn railway line.</p>
1.20	Applicant	<p>Future baseline Please confirm the year(s) that the future baseline conditions represent for each ES aspect chapter and explain why the same future baseline date has not been used by all assessments in the ES?</p>
1.21	Applicant	<p>Cumulative assessment ES Chapter 22 [AS-044] assumes that an interface plan would be in place with the developers of the Waterbeach Station Relocation to mitigate any potential cumulative effects with the Proposed Development. Please provide an update on progress with the development of this interface plan. How will it provide mitigation for potential effects with the Proposed Development? How would the terms of any agreement be managed and through what means by the Applicant? Who would be responsible for any corrective action required?</p>
1.22	Applicant	<p>Cumulative assessment Please clarify the conclusions of the cumulative effects assessment in relation to the two phased developments, Waterbeach New Town East and Waterbeach Station that are considered in ES Chapter 22, Table 2-6 [AS-044] to be both partly within the future baseline and also considered in the cumulative effects assessment?</p>
1.23	Applicant	<p>Future baseline / cumulative assessment ES Chapter 22, Table 2-6 [AS-044] identifies some projects as considered to be part of the future baseline rather than considered in the Cumulative Effects Assessment. No specific list of future baseline projects is identified in the ES and each aspect chapter makes aspect specific assumptions on the future baseline. Please provide a list to clarify which projects, or phases of projects, have been considered within the ES future baseline and which are considered in the ES cumulative effects assessment.</p>
1.24	Applicant	<p>Decommissioning The ES considers aspects of the decommissioning of the existing WWTP in some chapters. However, the ES does not appear to have assessed or made any assumptions regarding the future decommissioning of the proposed WWTP, despite some ES Chapters stating at the start that they present <i>the potential impacts of the Proposed Development on</i></p>

		<i>[...] during its construction, operational and decommissioning phases (for example ES Chapter 7: Air Quality [APP-039], amongst others). Notwithstanding para 1.7.4 of the Planning Statement [AS-166], please further justify the reason why the decommissioning of the proposed WWTP does not appear to have been assessed.</i>
1.25	Applicant	<p>Employment at the proposed WWTP – operational phase</p> <p>Table 2-6 of ES Chapter 11 Community [AS-028] notes that the Proposed Development would not result in a notable change in operational employment over and above the existing WWTP and in agreement with the Planning Inspectorate (the Inspectorate), the matter was scoped out.</p> <p>Para 2.2.6.2 of the Equalities Impact Assessment (EqIA) scoping report [APP-210] states that the number of staff on the existing WWTP would remain as current (20, including eight office staff) during construction of the proposed WWTP. The number of existing office staff set out at 5.2.1 of the Operational Workers Travel Plan (OWTP) [APP-149] is 26 (including eight office staff). Para 2.2.8.1 of the EqIA scoping report [APP-210] states that at the proposed WWTP, eight office staff are expected to be on site each day. However, PDF Page 62/68 of Consultation Appendix [APP-181] (which pre-dates [APP-210]) states that <i>As of October 2021, it is now confirmed that the total estimated number of combined small vehicle and van movements at the new facility (both ways) per day will instead total 92 movements. This is due to the recently confirmed inclusion of 30 office workers [...]. This will represent a like-for-like comparison with the existing traffic levels for office staff already associated with the current plant at Cowley Road [...].</i></p> <p>Table 5-1 of ES Chapter 2 [APP-034] suggests a total of 38 operational staff at the proposed WWTP and para 3.2.3 of the OWTP [APP-149] and Table 2-23 of ES Chapter 2 [APP-034] lists parking provision at the proposed WWTP for a total of 71 staff (plus 50 cycle spaces).</p> <p>Given the lack of clarity on staff numbers in the application documentation, and notwithstanding the Scoping Opinion of the Inspectorate, the ExA wishes to explore this matter further so that it can consider: any benefits from any increases in employment; traffic effects; functional relationship of staff to operations; and matters around associated development.</p> <ol style="list-style-type: none"> Please explain where the 30 office staff at the proposed WWTP would be relocated from? Before the relocation of all those office workers was confirmed, where was it envisaged that they would be located? Would the 30 office staff at the proposed WWTP work for Recycling Environmental Services (RES)? If yes, and bearing in mind that the office staff work a single daytime shift, why are 51 parking spaces proposed for RES staff? If no, what role would the RES staff using those 51 spaces be performing on the site? Why are 51 RES staff not included in the breakdown of staff at the proposed WWTP?

		<p>f) Why would RES staff have to be located on this site – are their roles physically connected to the operation of the WWTP such that it is essential for them to be on the proposed WWTP site or could they, for example, work remotely?</p> <p>g) Why, when the application documentation suggests that there would be 38 staff at the proposed WWTP and that staff would be encouraged to car share and use public transport (OWTP [APP-149]) are 71 car spaces and 50 bicycle spaces proposed?</p> <p>h) Please provide a schedule / table, supported by evidence to enable the corroboration of the information provided, setting out separately the number of staff at the existing WWTP and at the proposed WWTP, disaggregated as follows:</p> <ul style="list-style-type: none"> • job title / area of expertise for the roles / nature of the work • the number of people in that role • a brief explanation of whether / how the role is connected to the operation of the WWTP such that it is essential for that member of staff to treat the WWTP as their main place of work <p>i) Please set out whether any additional operational staff would be required as a consequence of the future expansion of the proposed WWTP.</p>
2. Principle (including policy and legislative context, need and alternatives)		
2.1	Applicant, IPs	<p>National policy</p> <p>a) A revised NPPF was published on 5 September 2023. Please address any implications this may have for the application and assessments undertaken.</p> <p>b) The National Policy Statement for Water Resources Infrastructure came into force on 18 September 2023. Please address any implications this may have for the application and assessments undertaken.</p> <p>c) Are you aware of any other updates or changes to national policy or guidance which may be relevant to the determination of this application that have occurred since it was submitted? If yes, what are these changes and what are the implications, if any, for the application?</p>
2.2	Applicant, CCC, SCDC, CCoC, IPs	<p>National policy</p> <p>NPSWW was designated in 2012. Taking account of any legislative and policy changes since that time:</p> <p>a) do you consider that there has been a significant change in any of the circumstances on the basis of which any of the policy set out in the statement was decided? If yes, which?</p> <p>b) Are the policy provisions relating to ‘factors for examination and determination of applications’ and the ‘generic impacts’ up-to-date or do any need to be supplemented or disregarded? Please provide justification for your response.</p> <p>c) Given that the Proposed Development is not one of the schemes that is named in NPSWW, which factors noted in NPSWW relating to the demonstration of need for waste water infrastructure should be taken into account in the determination of this application?</p>

		<p>d) Are there any other considerations relating to the need for waste water infrastructure that should be taken into account which are not noted in NPSWW? If yes, what are they and why should they be taken into account?</p> <p>e) Does NPSWW allow for developments that are not waste water infrastructure, such as housing, to form part of the need case for waste water infrastructure? If yes, please explain your response.</p> <p>f) Is there any other policy, guidance or legal precedent which suggests that developments that are not waste water infrastructure, such as housing, can form part of the need case for waste water infrastructure? If yes, please explain your response.</p>
2.3	Applicant, CCC, CCoC	<p>Effect of NPSWW</p> <p>Section 104(2) of the Planning Act 2008 (PA2008) says, in relation to an application for an order granting development consent, that in deciding the application the Secretary of State must have regard to any national policy statement which has effect in relation to development of the description to which the application relates.</p> <p>RR [RR-167] states that in relation to <i>EFW Group Limited v Secretary of State for Business, Energy and Industrial Strategy</i> [2021] the courts have confirmed that a s35 Direction does not in itself make the application an NSIP and therefore that the presumption in favour of development does not apply and s105 does apply.</p> <p>Similarly, RR [RR-151] states that <i>There is therefore no ‘presumption of need’ for the proposed development. The project is not in WINEP and policies in the NPS on Waste Water 2012 should be given little weight. The application should be determined under the provisions of s105 of the Planning Act 2008, not s104. The policies against which it should be tested are in the NPPF and the adopted local plans. The emerging NE Cambridge Area Action Plan and the Greater Cambridge Local Plan are at a relatively early stage in preparation and the latter is subject to ongoing review of its overall scope and strategic direction, so should be given little weight.</i></p> <p>a) In relation to this application, does NPSWW have effect?</p> <p>b) Does NPSWW set out a presumption in favour of development in relation to only those projects named in NPSWW or within the Environment Agency’s National Environment Programme (NEP)?</p> <p>c) Must a need be demonstrated for projects which are not named in NPSWW or the NEP?</p> <p>d) Should this application be determined under s104 or s105 of PA2008?</p> <p>e) If this application was determined under s105 of PA2008, should NPSWW be considered as important and relevant?</p> <p>f) If you consider that NPSWW to be important and relevant to a s105 determination, should the weight to be given to any of the considerations in NPSWW differ materially from a situation where the application is considered under s104? If so, which considerations, how would the weight differ and why would the weight differ?</p> <p>Please justify your answers.</p>
2.4	Applicant, CCC,	National policy

	SCDC	<p>ES Chapter 16 para 1.3.5 [APP-048], under the heading 'National Planning Policy for Waste 2014' (NPPW), states that <i>This sets out to identify need for waste management facilities and requirement for Local Authorities to identify in their Local Plans suitable sites and areas for waste management facilities (Department for Communities and Local Government, 2014).</i></p> <p>NPPW states at para 3 that when preparing Local Plans waste planning authorities should <i>undertake early and meaningful engagement with local communities so that plans, as far as possible, reflect a collective vision and set of agreed priorities when planning for sustainable waste management, recognising that proposals for waste management facilities such as incinerators can be controversial; ... and consider the extent to which the capacity of existing operational facilities would satisfy any identified need.</i></p> <p>a) Why did the local authorities not identify a suitable site for a replacement WWTP through their local plan process? b) Did the Applicant advocate that the local authorities identify a site? If yes, please provide evidence of this.</p>
2.5	CCC, SCDC	<p>The development plan</p> <p>a) Please provide full copies of any relevant adopted or emerging Development Plan policies (or other relevant documents e.g. North East Cambridge Area Action Plan) that you have referred to in any of your submissions. Should you refer to any additional Development Plan policies at any time in your future submissions (for example in a Local Impact Report) then, if they have not already been provided, please also submit copies of these into the Examination.</p> <p>b) Have there been any relevant updates to the statutory / emerging Development Plan(s) since the compilation of the application documents?</p> <p>c) Are the local planning authorities content with the Applicant's policy analysis?</p>
2.6	Applicant, CCC, SCDC, CCoC	<p>The development plan</p> <p>Please clarify which development plan policies / documents (adopted and emerging) are relevant to this DCO application and confirm whether the Proposed Development would be fully compliant with these policies and if not, which policies would it be in conflict with and why (this could form part of Local Impact Reports)?</p>
2.7	Applicant, CCC, SCDC	<p>The development plan</p> <p>Is it correct that neither the Cambridge Local Plan 2018 nor the South Cambridgeshire Local Plan 2018 require the relocation of the existing WWTP in their policies relating to NEC?</p>
2.8	Applicant, CCC, SCDC	<p>The development plan</p> <p>If development proposals for the existing WWTP site came forward in the absence of a replacement WWTP being secured, would development plan policy indicate that planning permission should be refused on the basis that the existing WWTP is essential infrastructure and should be protected or re-provided? If yes, please indicate which policy/ies would protect the existing WWTP.</p>
2.9	Applicant, CCoC	The development plan – Minerals and Waste Plan

		<p>The Planning Statement [AS-166] notes on page 102 <i>that the Cambridgeshire and Peterborough Minerals and Waste Plan Site Specific Proposals DPD-Preferred Options December 2006 identified a preferred site at Honey Hill, Horningsea/Fen Ditton, north of the A14 (Site SSP15) as the most appropriate location for the new CWWTP, although the document did not retain this allocation when finally adopted in 2012.</i></p> <p>a) Why did CCoC consider identifying land for a replacement WWTP at that time?</p> <p>b) Please provide:</p> <ul style="list-style-type: none"> (i) a copy of the draft policy and supporting text for Site SSP15; (ii) details of the decision setting out the reasons why the proposed allocation was not taken forward; and (iii) any background information / evidence base relating to the selection of sites for a replacement WWTP.
2.10	Applicant, CCC, SCDC	<p>Local planning policy – allocation of existing WWTP Site</p> <p>Please provide:</p> <ul style="list-style-type: none"> a) a concise chronology setting out the plan-making stages from the time when the existing WWTP site was first proposed for redevelopment; b) confirmation of who first proposed redevelopment of the site; c) any representations that were made by or on behalf of Anglian Water Services Limited or by any other party which highlighted the need to identify a site for a replacement WWTP if the existing WWTP was to be allocated for development; d) any responses to representations advocating the identification of a site for a replacement WWTP, or records of decisions by the Council in respect of the same (for example an explanation of why the Council did not think it necessary to allocate a site for a replacement WWTP); and e) any information that was submitted by Anglian Water Services Limited to inform the local plan / North East Cambridge Area Action Plan (NECAAP) process in respect of its locational requirements for a replacement WWTP.
2.11	Applicant, CCC, SCDC	<p>Emerging local plan and NECAAP</p> <p>Given the current early stage of the emerging local plan for the area and NECAAP:</p> <ul style="list-style-type: none"> a) What weight can be afforded to it and its policies; and b) Would it be premature to recommend / grant development consent relating to a site which is not yet formally allocated in a local plan.
2.12	CCC, SCDC	<p>Emerging local plan</p> <p>Please provide an update on the progress made in respect of the emerging local plan and NECAAP, including in relation to water supply issues. Please explain the implications of water supply issues in respect of the type(s) of land use that are affected by this issue and whether the amount of development in the emerging local plan might be affected. What are the timescales for resolving this issue?</p>
2.13	SCDC	Emerging local plan and draft NECAAP

		<p>On page 120 of Applicant Regard to Section 42 Consultation Responses [APP-167], the following comment is attributed to South Cambridgeshire District Council: <i>The AAP committee reports also, however, emphasised that the DCO process is a separate statutory planning process from the GCLP planmaking process and that the project itself will be determined under different legislation and by a separate decision maker i.e., ultimately the Secretary of State. The ReWWTP is therefore not a project or proposal within the scope of the joint GCLP or the AAP and it would be inappropriate for it to be such. Both plans are therefore currently being prepared on the basis that the CWWTP will be relocated but this relocation is not a policy requirement of either plan.</i></p> <ul style="list-style-type: none"> a) Please provide a copy of the Committee Reports referred to in [APP-167] and a copy of the record(s) of any decision(s) relating to them (such as Committee minutes). b) Why would it be 'inappropriate' for the proposed WWTP to be within the scope of the emerging local plan or NECAAP if it is a policy of those documents which gives rise to the need for it to be relocated? c) Could an application for a replacement WWTP be determined under the TCPA regime? d) Can proposals which may be consented under the DCO process be reflected in a statutory development plan, for example by identifying or safeguarding land for them, even if an application would not be determined under the TCPA regime? e) Given that it was within the knowledge of the local authority that the redevelopment of the existing WWTP site would require the provision of a new WWTP, and given the prospect that the site for a new WWTP might be in the Green Belt, why did the emerging local plan not make provision for this, particularly given that Green Belt boundaries can only be altered through a review of a local plan? f) Have any studies been undertaken on or on behalf of the local authorities (but not including any studies by the Applicant) to identify a site for a replacement WWTP? If yes, please provide a copy. If not, please explain why not. g) If this application for a DCO is not consented, given that the development of at least part of the NECAAP area would depend on relocation of the WWTP, would you expect the draft NECAAP to be found sound and adopted? Would you progress the NECAAP in its current form? h) Given that the relocation of the WWTP is not a policy requirement of either the emerging Local Plan or the draft NECAAP, could it be concluded that housing that would be delivered on the site of the existing WWTP is not required to meet the housing requirement identified in the emerging Local Plan? i) How much weight should the SoS give to a proposal that is not a requirement of an emerging non-statutory planning document such as an AAP? j) Does the draft NECAAP seek to pre-judge the outcome of this DCO Application? If not, what weight can be afforded at this time to those provisions of the draft NECAAP which depend on the approval of this DCO application? k) If this DCO application was not consented, could redevelopment of other parts of NEC be brought forward in the absence of an adopted NECAAP? If not, approximately how long would it take to prepare and adopt a revised NECAAP?
2.14	CCC	Emerging local plan and draft NECAAP

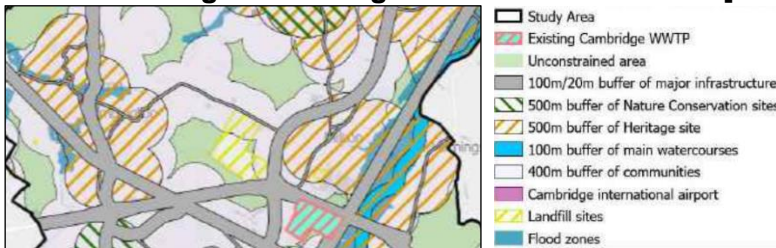
		<p>CCC's RR [RR-002] states that: 28. <i>The City Council recognises that one of the issues the ExA may need to explore is that of reasonable alternatives to the relocation of the existing CWWTP and what the City Council's position is in light of the above and the clear contribution the DCO project makes towards achieving the objectives currently contained within the emerging joint GCLP.</i> and that 29. <i>The evidence base supporting the emerging GCLP is clear. This concludes, of all the options considered, the NEC site (which includes the existing CWWTP site as noted above), is the most sustainable location for development in the area.</i></p> <p>a) Please provide a copy of the evidence base / Sustainability Appraisal that concludes that, of all of the options considered, the NEC site is the most sustainable location;</p> <p>b) Did the assessment of sustainability take account of the release of Green Belt land to facilitate development of the NEC site when it assessed the relative sustainability of growth options? If not, clarify the reason for this;</p> <p>c) Has an option been considered where the existing WWTP remains <i>in situ</i> and other parts of NEC are redeveloped? Has this possibility been independently assessed by / on behalf of the Council and consulted on;</p> <p>d) Which alternatives to NEC were considered and discounted;</p> <p>e) RR [RR-200] mentions potential for housing development at Impington and Histon and at Cambridge City Airport instead of using the existing WWTP site – please clarify whether these sites have been considered for future housing development?</p> <p>f) Has an option of denser development at other proposed allocations / on a reduced-size NEC been explored as an alternative to the currently proposed extent of NEC?</p>
2.15	Applicant, CCC, SCDC	<p>Housing benefits – weight</p> <p>How much weight should the ExA afford to housing delivery as a benefit having regard to: the unallocated status of the existing WWTP site; demolition / remediation associated with the existing WWTP site not secured through the dDCO; housing delivery not secured through the dDCO; no specific policies within the current development plans for CCC and SCDC relating to the relocation of the existing WWTP to the site proposed; and any draft policies in the emerging local plan and the NECAAP not having yet been tested or formally examined?</p>
2.16	Applicant, CCC, SCDC	<p>Planning history</p> <p>Is there any planning history of relevance to the determination of the DCO application?</p>
2.17	Applicant	<p>Importance of the Proposed Development</p> <p>Para 1.3.6 of the Guide to the Application [AS-138] states that <i>The importance of the Proposed Development, both regionally and nationally, was recognised by the Secretary of State for Environment, Food and Rural Affairs (DEFRA) in January 2021, who directed that the Proposed Development is nationally significant and is to be treated as a development for which a Development Consent Order (DCO) is required (see Appendix 1-3 of the Planning Statement, App Doc Ref 7.5).</i></p>

		Please set out the reasons why you consider the Proposed Development (i.e. the development described in the dDCO [AS-139], and excluding any other development that may be facilitated by the relocation of the existing WWTP) to be of regional and national importance.
2.18	Applicant, IPs	Need Is the Applicant or any IP aware of any other DCO applications which relied on housing need to justify the Proposed Development in totality or in part?
2.19	Applicant, CCC SCDC	Need – NPPW Para 7 of NPPW states that waste planning authorities should <i>only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where proposals are not consistent with an up-to-date Local Plan. In such cases, waste planning authorities should consider the extent to which the capacity of existing operational facilities would satisfy any identified need.</i> a) Do you consider that a need should be demonstrated for the proposed WWTP; and b) Do you consider that the extent to which the capacity of the existing operational facilities would satisfy the need should be taken into account?
2.20	Environment Agency (EA)	Need – NEP Do you consider that the need for the Proposed Development has been demonstrated for environmental reasons and do you intend to incorporate it into any NEP? If not, why not?
2.21	Applicant	Need – existing WWTP a) If the relocation of the existing WWTP was not consented, would there be sufficient capacity or could additional capacity be created at the existing WWTP and Waterbeach Recycling Centre to accommodate growth in the WWTP's catchment area during the forthcoming local plan period(s)? b) If additional capacity needs to be created, when would this be needed by and how would this be funded?
2.22	Applicant	Existing WWTP – recent investment a) Please provide details of any recent investment and upgrades to the existing WWTP, noting that a number of RRs (e.g. [RR-169]) make reference to this; b) Explain what brought about this investment; and c) Clarify what the lifespan of this investment was?
2.23	Applicant	Benefits Taking any perceived housing / redevelopment benefits out of the equation: a) What would be the main benefits that, in the Applicant's view, the Proposed Development would provide; b) Would these, in the Applicant's view, be sufficient on their own to demonstrate the very special circumstances needed to justify inappropriate development in the Green Belt and to amount to public benefits to outweigh less than substantial harm to designated heritage assets (and to outweigh all other harms identified); and c) Could these benefits be achieved by further improvements to the existing WWTP.
2.24	Applicant	Benefits

		<p>ES Chapter 2 section 6 [APP-034] sets out benefits of the Proposed Development relating to reduced carbon emissions, storm water management and water quality.</p> <p>a) Would any of these be required to meet future regulatory requirements; and</p> <p>b) Could any of these reported benefits be achieved without relocating the WWTP? If not, please explain why.</p>
2.25	Applicant, CCC, CCoC, SCDC	<p>Benefits</p> <p>It is proposed that the Waterbeach WRC would be replaced by a new pumping station, which would direct untreated effluent to the proposed WWTP and would support the development of Waterbeach New Town. However, given that the new pumping station at the Waterbeach site is outside of the control of this DCO application (as it is proposed to be provided by the developer of Waterbeach New Town and is subject to a separate planning application which has not yet been submitted), how can the ExA have confidence that this would be granted planning permission and be delivered, if the proposed WWTP were consented? Can an update be provided on the timescale for submission and likely determination of the pumping station? To this end, what extent can the benefits of providing connection from Waterbeach to the proposed WWTP be offered weight in the planning balance at this time?</p>
2.26	Applicant	<p>Site selection and alternatives</p> <p>Please explain what informed the choice of criteria used in Stage 4 Final Site Selection of the alternatives assessment [AS-018]?</p>
2.27	Applicant, CCC, SCDC, CCoC, IPs	<p>Site selection</p> <p>According to Environmental Statement Chapter 3 - Appendix 3.1 Initial Options Appraisal [APP-074], the Government announced in March 2019 that a Housing Infrastructure Fund (HIF) funding would be granted for the relocation of the existing WWTP. At para 2.2.22 of ES Chapter 3 [AS-018], and in respect of Stage 3 of the site selection process it is stated that <i>consideration was also given to the relative affordability of the sites, an important factor given the public funding of the CWWTPRP by the Government's HIF</i>. The Stage 1 Initial Site Selection Report [APP-075] is dated 1 July 2020 and the Stage 3 Fine Screening Report [APP-077] is dated 1 July 2020. Para S.14. of [APP-077] notes that some of the options explored in 2020 were unaffordable based on the amount of HIF funding that had been awarded. At para 2.2.24 of ES Chapter 3 [AS-018] it is stated that sites outside of the Green Belt were not deliverable under the HIF funding and that this was primarily a function of the significant additional tunnelling necessary to transfer waste water to sites outside of the Green Belt.</p> <p>a) When was the bid for HIF funding submitted?</p> <p>b) Prior to the July 2020 site selection exercises were undertaken, were options for the relocation of the WWTP explored and costed to support the HIF bid?</p> <p>c) If yes, please provide details of the sites that were considered and those which were discounted. Was the range of sites the same or more limited than in the July 2020 exercise? If it was more limited please explain why, and why the area of search was expanded for the July 2020 exercise that has been submitted as part of this DCO application.</p> <p>d) Was the scope of the site search exercise for the HIF bid agreed with any local authority?</p>

		<p>e) Which site or sites in [APP-075] could be delivered within the £227m funding envelope? Please provide evidence to support your response.</p> <p>f) If it was already known that some sites were not deliverable within the HIF funding envelope, why were they included in subsequent analyses? Does this affect the robustness of any consultation that was undertaken after the HIF funding announcement?</p> <p>g) Was the £227m bid based on the highest-cost option? If not, which options were discounted for the purposes of the bid?</p> <p>h) Was Homes England made aware that the cost of tunnelling was a variable that could affect the affordability of a relocation scheme?</p> <p>i) Were any planning risks in respect of the relocation site identified in the bid? If yes, what were they and did they include the Green Belt designation? Was it explained that non-Green Belt options could be delivered at a higher cost?</p> <p>j) Was it made clear in the bid that no site had been allocated or proposed to be allocated in a development plan document for a replacement WWTP? Was this considered to be a project risk?</p> <p>k) Please provide a copy of the HIF bid submission and a copy of Homes England's assessment and decision, including any conditions / obligations attached to it.</p>
2.28	Applicant	<p>Site selection – alternatives</p> <p>In ES Chapter 3 [AS-018] and in respect of the sites that were being studied for a potential relocation of the existing WWTP the following is noted:</p> <p><i>2.3.20 Subsequently, in early 2020, a call for sites was issued by the Greater Cambridge Shared Planning Service (GCSPS) as part of the Greater Cambridge Local Plan process. In response to this call, and as part of the associated consultation process, the landowner at site area 2 submitted a proposal for over 185,000sqm of commercial floor space on the site, to form an expansion to the Cambridge Science Park.</i></p> <p><i>2.3.21 The Science Park expansion proposals were not taken forward by GCSPS as part of the First Proposals for the Local Plan in Autumn 2021. Furthermore, although the OxCam Arc initiative received strong governmental support through the publication of a policy paper (DLUHC & MHCLG, 2021) in February 2021, that initiative has subsequently stalled and some elements of the government strategy, most notably the construction of the Oxford-Cambridge Expressway, having been cancelled.</i></p>

		<p>2.3.22 However, although the promotion of the site was not successful in 2020/21, the Anglian Water CWWTPRP team, supported by appropriate local planning and property advice, consider that future urban growth and development pressures would be likely to affect the long-term resilience of this site for a WWTP due to the close proximity to the Cambridge urban fringe. The site represents the highest construction cost option and a high risk remains that CWWTPRP viability could be undermined by significant increases in land value associated with possible future promotion of the land for commercial development. These risks are far lower at site areas 1 and 3. Therefore the original analysis made at the time of the Stage 4 site selection process remains accurate.</p> <p>a) Who provided the appropriate local planning and property advice?</p> <p>b) Was the advice of the local authorities sought in relation to the longer-term prospects for Site 2? If yes, please provide details of the advice given.</p> <p>c) Whilst this site was the highest construction cost option, could it have been funded within the HIF funding envelope?</p> <p>It is said that <i>viability could be undermined by significant increases in land value associated with possible future promotion of the land for commercial development.</i></p> <p>d) Given that the emerging local plan has not yet been adopted, is it likely that another opportunity to promote this site would become available within the timescale for the implementation of a DCO for a replacement WWTP? If yes, please explain your answer.</p> <p>e) Was an offer made to the owner of Site 2 for their land and if so did they say that it was unacceptable to them? If yes, please provide evidence to support your response.</p>
2.29	Applicant, CCoC	<p>Site selection – scope</p> <p>In the Consultation Appendix Site Selection Report [APP-179] the following is stated: 4.2.1 <i>The relevant national, regional and local policies were reviewed to identify the primary constraints and, where appropriate, apply buffer zones around them. The use of buffers ensured that any unconstrained areas would be away from residential properties, protected and statutory designated sites and existing important infrastructure in order to limit any potential impacts on them. The criteria, the buffers applied, and the relevant policies are provided in Table 4.1. and 4.2.2 It is noted that the NPS for Waste Water does not refer to prescribed buffer zones for any of the criteria.</i></p>

		<p>In respect of 'Communities' a 400m buffer applied around all residential properties. This is explained thus in Table 4.1 (PDF page 22/53 of [APP-179] – the internal page numbering is not sequential): <i>The buffer was defined to comply with the assessment methodology in Anglian Water asset encroachment policy, which assesses the potential risk of proposed development in proximity to existing WWTPs primarily in relation to odour impacts and states that developments within 400m of a WWTP are at a high risk of potential impact. It is considered that the policy is also relevant to siting of new WWTPs. Therefore, Anglian Water considers that situating the new WWTP within 400m of any existing residential properties would result in unacceptable risks to the local community and the operation of the plant.</i></p> <p>a) Does the 400m buffer align with development plan policy? Please provide a copy of any relevant policy.</p> <p>b) If yes, if there any flexibility in development plan policy to allow a buffer that is less than 400m?</p> <p>c) The ES Community chapter [AS-028] states that communities with a minimum of 30-50 properties formed part of the community-level assessment. Was the approach of identifying sites with regard to individual dwellings sufficiently flexible?</p> <p>d) The area around Milton Road / Butt Lane (shown below) appears to have been discounted on the basis of the '400m buffer of communities' despite this area being very sparsely populated. Were any more detailed studies undertaken to ascertain whether, in areas such as this, the effects on residential properties could be mitigated such that there could be a larger 'unconstrained area' from which to identify a site for the replacement WWTP?</p> <p>Extract from Figure 4.2: Stage 1 Baseline Constraints [APP-179]</p> 
2.30	Applicant, CCC, SCDC, Homes England	<p>Housing delivery – certainty of housing delivery on existing WWTP site</p> <p>What evidence is there to demonstrate that the existing WWTP site is likely to be suitable for development – for example, if the land is shown to have been contaminated over the years by the existing WWTP, has there been a feasibility assessment and financial estimate for site remediation and an assessment made as to whether this would be prohibitively expensive for a developer?</p>
2.31	Applicant, CCC, SCDC	<p>Emerging local plan and draft NECAAP</p>

		<p>In the RR of CCC [RR-002] it is stated that 30. <i>However, the City Council recognises that it would have to review the situation in the event that the release of the CWWTP site does not occur for any reason, for example if the SofS decides to refuse to grant the DCO or if there are delays to the release of the existing CWWTP site or indeed if the applicant decides not to implement the DCO.</i> and that 31. <i>The City Council together with South Cambridgeshire District Council would have to try to identify and allocate other land within Greater Cambridge as part of the emerging GCLP to meet the area's strategic requirements for housing and employment.</i></p> <p>a) Given the award of HIF funding to support housing delivery, are there any conditions attached to that funding or obligations which require the Applicant to implement the DCO? If there are obligations on the Applicant, please provide details of these and the timing of those obligations.</p> <p>b) In the development agreement or any other agreement, are there obligations on the Applicant to make the existing WWTP site available by a certain date? If yes, what is the date? Please provide a copy of this obligation or the reference to it if in a document that you have already provided.</p> <p>c) In the development agreement or any other agreement, are there obligations on the NEC master developer or any other party to commence or to complete the redevelopment of the existing WWTP site by a certain date? If yes, what is / are the date(s)? Please provide a copy of this / these obligation(s) or the reference to it / them if in a document that you have already provided.</p> <p>d) Please provide details of the number of homes that need to be delivered at NEC within the plan period of the emerging local plan.</p> <p>e) Please provide the housing trajectory for the emerging local plan period which disaggregates the number of homes at NEC per year and the number of those homes which would be on the existing WWTP site.</p> <p>f) If the DCO is not consented, how many homes could be brought forward at NEC? Please provide a marked-up copy of the draft policies map / site allocation to indicate which parts could still be brought forward.</p>
2.32	Applicant, CCC, CCoC	<p>Housing development around the existing WWTP</p> <p>Statement of Requirement [APP-201] para 10 states that <i>The WWTP cannot remain at the existing site and still release a significant area of brownfield land for residential development even if it is reconfigured with a reduced footprint. If the WWTP was reduced in size, redevelopment of the remaining area would be restricted, particularly for residential development because of the necessary safeguarding imposed around it. AWS' experience of residential development close to waste water treatment plants would preclude it from allowing such a scenario to happen.</i></p> <p>Para 11 goes on to state that: <i>A safeguarding area of 400 metres exists around all waste water treatment plants in Cambridgeshire and Peterborough. Where <u>new</u> development is proposed within the safeguarding areas involving buildings which would normally be occupied, the associated planning application must be accompanied by an odour assessment report.</i></p>

		<p>Similarly, ES Chapter 3 [AS-018] states <i>As discussed in the Planning Statement, option (b) (co-location of new development alongside the existing treatment works) would be heavily constrained by planning policy, including the provisions of the Cambridgeshire and Peterborough Minerals and Waste Local Plan, adopted in July 2021. Policy 16 of the local plan establishes a presumption against development of buildings which would be regularly occupied by people within a consultation area of 400m from the edge of the site of a Water Recycling Area (para 1.2.4). This policy would restrict development at NEC to employment land-use with largely general industrial and office uses on the fringes of the area. Housing development would not be possible on a core 35ha of land forming the gateway between Cambridge North station and the Cambridge Science Park (para 1.2.5). Consideration was additionally given to consolidating the existing treatment assets to occupy a smaller area of the existing site. However, this approach would not fully remove the presumption against development on large parts of the remainder of the site described above. Furthermore, the business case for the HIF funding award could only be sustained on the relocation of the whole WWTP, to enable regeneration of most of the site for housing. Funding was not available for a partial solution and without it, consolidation would be uneconomic. There was no partial solution which could sustain HIF support (para 1.2.6).</i></p> <p>a) Please provide a copy of the layout for NEC that the above comments from the Statement of Requirement and ES Chapter 3 have been based on.</p> <p>b) What is the status of that layout – does it benefit from planning permission?</p> <p>c) Please explain how many units would be lost from that layout if the WWTP remains <i>in situ</i> and if a 400m buffer zone is observed.</p> <p>d) Please explain how many units would be lost from that layout if the footprint of the WWTP were to be reduced / consolidated (which [APP-201] does not specifically state would be unfeasible) and if a 400m buffer zone is observed.</p> <p>e) Have measures to reduce the 400m buffer zone / safeguarding area been explored in this scenario? If so, please provide details and how many additional homes could be achieved. If not, please explain why not.</p> <p>f) Does the draft NECAAP provide an indicative distribution of land uses across the AAP area? If so, is there scope to alter / reconfigure the indicative distribution of land uses so that employment / business uses are closer to a retained or a reconfigured WWTP? If not, why not?</p> <p>g) Please comment on [RR-077] which suggests that Deephams and Eastbourne waste water treatment works demonstrate scope for housing being much closer than 400m with appropriate design.</p> <p>h) In respect of there being no partial solution which could sustain HIF support, please provide a copy of any bid / submission that was made in relation to funding for a partial solution and Homes England's response to this.</p>
2.33	Applicant, CCC, SCDC	<p>Housing delivery at NEC</p> <p>ES Chapter 2 [APP-034] notes at para 6.1.1 that <i>Once construction and commissioning of the proposed WWTP has been largely completed, there will be no requirement for any of the above ground plant or equipment at the existing Cambridge WWTP to remain in operation, other than that related to the new transfer tunnel shafts that comprises a vent</i></p>

		<i>stack, odour control and dosing unit.</i> Does the remaining plant affect the amount of housing envisaged in the emerging Local Plan and associated NECAAP?
2.34	Applicant	<p>Housing delivery</p> <p>ES Chapter 3 [AS-018] notes at para 1.2.3 that <i>In respect of option (a) ("do nothing"), such an approach would result in the failure to fully deliver on required housing numbers in Greater Cambridgeshire and / or necessitate the delivery of housing at less sustainable locations.</i></p> <p>a) Please indicate, with reference to the emerging local plan housing trajectory, the extent of the failure to fully deliver on required housing numbers in Greater Cambridgeshire.</p> <p>b) Which less sustainable locations would need to be developed, and how many homes would need to be delivered at such locations during the emerging local plan period?</p>
2.35	Applicant, CCC, SCDC	<p>Proposed Development</p> <p>Were the DCO to be consented, could there be a situation where:</p> <p>a) the Proposed Development is implemented and the existing WWTP site is not developed;</p> <p>b) the Proposed Development is only partially implemented, such as the Waterbeach pipeline element connecting to the existing WWTP which is due to be implemented first (according to Figure 1.1 of ES Chapter 2 [APP-034]) and is not reliant on HIF funding;</p> <p>c) If your answer to the above two questions is no, please provide reasons for this.</p>
2.36	Applicant	The Applicant confirmed its view at Issue Specific Hearing 2 that the Proposed Development is not a 'Nationally Significant Infrastructure Project' and does benefit from a presumption in favour of development under NPSWW. Does the Planning Statement [AS-166] require updating in light of this (e.g. given it refers numerous times to policy etc... relating to NSIPs).
3. Agricultural land and soils		
3.1	Applicant	<p>Code of Construction Practice (CoCP)</p> <p>ES Chapter 6 para 4.2.96 [AS-024] refers to measures in section 7.6 of the CoCP Part A relating to severance to farm businesses and farm access maintenance, provision and reinstatement. Please highlight which specific para / bullet point in section 7.6 of the CoCP Section A addresses this, as it unclear to the ExA.</p>
3.2	Applicant	<p>Monitoring</p> <p>ES Chapter 6 para 4.2.107-109 (and 4.3.14-16) [AS-024] refer to measures in section 7.4 of the CoCP Part A relating to soil monitoring and to section 5.7 of the oSMP in relation to 1-5 years of soil monitoring. However, it is not clear to the ExA where such matters are specified in the stated sections of the respective documents. Please clarify or update the documents as necessary.</p>
3.3	Applicant	Reinstatement

		ES Chapter 6 [AS-024] - please check that all references to para / sections in other documents are correct and if not, please correct these. For example, page 55 refers to <i>Return land temporarily required during construction to previous use through reinstatement and implementation of section 7.5 of the CoCP Part A and application of a SMP based on the outline SMP (App Doc Ref 5.4.6.3)</i> . However, section 7.5 of the CoCP Part A does not appear to relate to land restoration.
3.4	Applicant	Assessment ES Chapter 6 [AS-024] indicates that the decommissioning of the existing WWTP has been considered as part of the assessment (e.g. para 1.1.1 and 2.8.6). However, this does not appear to be the case. Please clarify.
3.5	Applicant	Assessment ES Chapter 6 para 3.1.9 [AS-024] notes that a farm was not included in the assessment due to access issues and lack of farming activity on the land. Have any further investigations been carried out in this regard to inform an assessment, and if not, does the Applicant intend to undertake any during the course of the Examination? If not, how can the ExA be certain that there has not been a change in circumstances which might give rise to an adverse effect as a result of the Proposed Development?
3.6	Applicant	Soil management Natural England's (NE) RR [RR-015] raises a number of concerns, including around: a) lack of information regarding soil re-use (including quantities and restoration profiles); b) the absence of a detailed Agricultural Land Classification survey where temporary disturbance would occur (i.e. along the route of the proposed Waterbeach pipeline); c) a lack of information in the Soil Management Plan relating to peaty soils, which require additional protection measures; d) and incorrect standards used in ES Chapter 6 [AS-024] (i.e. the British Standard cited in bullet point 6 on page 10 and the use of HS2 for impacts on agricultural land) and in the Soil Management Plan (i.e. MAFF Good Practice Guide for Handling Soils (2000) rather than the Institute of Quarrying Good Practice Guide for Handling Soils in Mineral Workings (2021)). Please address these concerns.
3.7	Applicant	Construction The Project Description [APP-034] refers to the use of horizontal directional drilling (HDD) (or pipe jack micro tunnelling) in some areas. Where are these areas shown and where would the use of HDD or pipe jack micro tunnelling be secured?
3.8	Applicant	Assessment Appendix B (Agricultural Impact Assessment Results) of ES Appendix 6.2: Agricultural Impact Assessment [APP-082] has a number of entries such as 'TBC' (including for whether land take would be permanent) or 'Not so far as we are aware at this stage' for impacts on other revenue sources. a) Does the Applicant intend to update this table with the relevant information (i.e. the Applicant is likely to know whether permanent land take is required from cross referencing with the Land Plans [AS-151]); and b) If so, might this affect the assessment undertaken?
3.9	Applicant	Farm holdings

		ES Chapter 6 at para 2.3.4 [AS-024] notes that farm holdings have been assigned an alphanumeric code to retain farm anonymity. However, given this, it is unclear to the ExA which plot numbers in the Book of Reference [AS-145] relate to the farms assessed in ES Chapter 6 and whether any RRs have been provided from the relevant landowners / farm owners (or others with an interest). Please provide a solution to this matter.
4.	Air quality	
4.1	Applicant	Policy Para 1.3.8 of ES Chapter 7: Air Quality [APP-039] refers to para 174 and 186 of the NPPF. Are any other paragraphs of the NPPF relevant to the consideration of the air quality effects of this application, e.g. para 105?
4.2	Applicant	Policy Para 1.3.9 of ES Chapter 7 [APP-039] says that local planning policy of relevance to the Proposed Development “includes”...; - are there any other policies that should be considered which are not listed in this chapter of the ES?
4.3	Applicant, CCC, SCDC	Policy Do you consider the air quality-related policies of the November 2021 ‘Proposed Submission North East Cambridge Area Action Plan Regulation 19’ or of the Regulation 18 ‘Greater Cambridge Local Plan’ to be Important and Relevant to the consideration of the DCO application?
4.4	Applicant, CCoC	Heavy duty vehicle (HDV) movements – clarification Para 2.3.12 of ES Chapter 7 [APP-039] says that the largest increase in construction vehicles is 528 HDV on the A14 between J32 and J33. At A14 J33 the number of two-way movements reduces as 59 HDV exit the A14 and continue to the transfer access works via the A1309. The other HDV would continue on the A14 and exit at J34. To the Applicant: a) Do the 528 and 59 figures in para 2.3.12 relate to the number of vehicles or the number of two-way trips? b) If 469 HDVs (528 minus 59) continue to J34, please explain why para 2.3.14 says that traffic movements on A14 J34 entry and exit ramps would increase by 415 HDVs in total. To CCoC: c) Does CCoC agree with the traffic movement figures used in Chapter 7 and that the TA represents a sound basis for the assessment of air quality impacts?
4.5	CCoC	Air quality comments CCoC made comments in respect of Air Quality at the Section 42 stage (see Applicant Regard to Section 42 Consultation Responses [APP-167]) but there are no air quality-related comments in its RR [RR-001]. Please confirm whether the Council will be making any representations in relation to air quality.
4.6	CCC, SCDC	Air Quality Statutory Limits Do you consider that the Proposed Development would lead to non-compliance with any statutory limits whether during the construction, operational or decommissioning phases?

		Do you consider that any substantial changes in air quality would be expected as a consequence of the Proposed Development?
4.7	Applicant	Decommissioning of existing WWTP ES Chapter 7 [APP-039] para 4.4.3 says that predicted impacts and effects on air quality associated with construction vehicle movements and construction plant during the decommissioning of the existing WWTP have been assessed. Has dust associated with decommissioning activities been assessed? If not, please provide an assessment, or justify why one is not necessary.
4.8	CCC, SCDC	Policy compliance and mitigation SCDC's RR [RR-004] says that, in general terms, it is satisfied with the scope, methodology and the initial conclusions derived from the Air Quality chapter of the ES. CCC's RR [RR-002] says that it is satisfied with the scope, methodology and results / conclusions of ES Chapter 7 when considering potential impacts within the City boundary. It also notes that CCC intends to comment upon the Decommissioning Management Plan (DMP) prior to works commencing. CCC recommends that airborne dust and emission control, management and monitoring during decommissioning should be captured by the DMP document to help minimise impacts of that phase of work. a) Does SCDC wish to make any further detailed comments? b) Please endeavour to agree DMP measures with the Applicant. c) Is the DMP referred to by CCC the same document that is referred to as the 'detailed decommissioning plan' which is provided for at R9(2)(b)(xiv) in the dDCO [AS-139]? d) Which local authority would be responsible for approving this? If it is not CCC, would CCC be given an opportunity to comment? e) Are there any other air quality-related mitigation measures / requirements that CCC or SCDC thinks should be included?
4.9	Natural England (NE)	Mitigation and requirements NE's RR [RR-015] says that it is satisfied with the Applicant's conclusions in respect of Air Quality on the basis that delivery of air quality control measures within the CoCP are secured through dDCO R8. For the avoidance of doubt, please specify the measures that NE wishes to be secured by R8.
4.10	Applicant	Draft Requirement 9 ES Chapter 7 [APP-039] refers to "Air Quality/Dust Management Plan(s)" e.g. at Table 5-2. R9(2)(a)(x) and R9(2)(b)(x) of the dDCO [AS-139] refers to "an air quality management plan". Should the dDCO be altered to reflect the terminology in the ES?
5. Biodiversity		
5.1	Applicant	Drafting Error

		Appendices A-D listed under the contents pages of ES Chapter 8 Biodiversity [AS-026] and the Biodiversity Net Gain (BNG) Assessment Report [AS-161] are mislabelled and/or missing. Only one of the appendices has been provided (BNG detailed metric), which is titled as <i>Appendix D</i> within the BNG Assessment Report at the end of the document, but is labelled <i>Appendix C</i> under the contents page of both of the aforementioned documents. Please update the labelling and provide all of the appendices listed in the documents.
5.2	Applicant	Drafting Error ES Chapter 8 para 4.2.198 [AS-026] states that <i>The COCP Part A Section 4 and Section 6.2 (Appendix 2.1, App Doc Ref: 5.4.2.1) includes best practice measures to minimise impacts from lighting through design</i> . However, CoCP Part A [APP-068] does not reference lighting design at Section 4 or Section 6.2. Please update the document(s) accordingly.
5.3	Applicant	Drafting Error ES Chapter 8 Biodiversity [AS-026] (4.2.201) references section 4.16 of CoCP Part A [APP-068]. However, this section does not appear to exist. Please update the document(s) accordingly.
5.4	Applicant	Response to ExA's Procedural Decision [PD-004] Regarding the ExA's Procedural Decision [PD-004], Biodiversity point 16.(f) has not been addressed in full – para 4.2.94 of ES Chapter 8 [AS-026] now refers to figure 6.3 which the ExA cannot locate within the Bat Technical Appendix [APP-092]. Please check and update accordingly.
5.5	Applicant	Baseline survey conditions Please confirm how the baseline for the condition of the Low Fen Drove Way Grasslands and Hedges County Wildlife Site (CWS) has been established in the absence of baseline habitat surveys?
5.6	Applicant	Baseline survey conditions, impacts from lighting and enhancements to CWS CCoC suggests that condition survey work has not been completed and that not all impacts have been identified on the Low Fen Drove Grasslands and Hedges CWS. CCoC also suggest that residual adverse effects from the proposed lighting scheme have not been addressed, and opportunities for enhancements to the CWS have been missed [RR-001]. Please provide a comprehensive response to address these points.
5.7	Applicant	Assessment Please explain the approach to the biodiversity assessment (ES Chapter 8 [AS-026]) that indicates a 'slight beneficial effect' could be both significant or not significant? How has professional judgement has been used to make the distinction in the conclusions?
5.8	Applicant	Response to RR from CCoC CCoC (para 4.3) [RR-001] has identified a number of concerns regarding the mitigation of impacts of the Proposed Development on biodiversity, the Habitats Regulations Assessment and regarding the drafting of the DCO (para 4.4). CCoC also seeks clarification on the proposed Advisory Group (para 4.5). Please provide a detailed response to these queries and concerns.
5.9	CCC	Cambridge Local Plan 2018

		Do you consider that ES Chapter 8 [AS-026] sufficiently addresses Policy 70 of the Cambridge Local Plan 2018, notably in relation to the requirement to assess the Proposed Development on Cambridgeshire-specific biodiversity action plan species and their habitats?
5.10	Applicant, SCDC	Clarification of information regarding SCDC's RR In SCDC's RR [RR-004], clarification is sought regarding ES Chapter 8 Table 2-8 [AS-026]. Please liaise with one another to establish what clarification is required and suitably address this matter.
5.11	Applicant	Scope of the Landscape, Ecological, Recreation Management Plan NE [RR-015] and National Trust [RR-031] consider that the scope of the Landscape, Ecological, Recreation Management Plan (LERMP) should be extended to cover the <i>entire</i> project area and for this to include ecological mitigation, enhancements (including BNG) and management across the wider project area. Please provide justification as to why the LERMP does not cover the whole of the project area, or update the LERMP accordingly in liaison with relevant stakeholders.
5.12	Applicant	Impacts from recreational pressure on Stow-cum-Quy Fen SSSI NE [RR-015] raises concerns regarding the potential for significant adverse effects on Stow-cum-Quy Fen SSSI through the proposed access enhancements. NE suggests that rigorous survey evidence to inform a robust assessment of recreational pressure impacts on the SSSI should be provided in order to assess the impacts of recreation on the SSSI, or that a post-construction monitoring programme and adaptive landscape management approach, progressed through a wider partnership arrangement, could provide acceptable mitigation. Please confirm how you intend to address this matter.
5.13	Applicant, National Trust (NT), Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire (WTBCN), CCoC, CCC, SCDC	Impacts from recreational pressure on Stow-cum-Quy Fen SSSI Do you agree with the proposed wording set out on pages 18 and 19 of NE's RR [RR-015] regarding dDCO R11 and do you consider this would act as a suitable solution to address concerns regarding the impacts from increased recreational pressure on Stow-cum-Quy Fen SSSI ([RR-015] para 4.3.21 and 4.3.22)?
5.14	NE, EA, NT, CCC, CCoC, SCDC, WTBCN	Comments on updated information submitted by the Applicant Please review and comment on the additional information provided by the Applicant in response to the ExA's Procedural Decision [PD-004], regarding the impacts of the Proposed Development on biodiversity with particular reference (but not limited to): the outline Outfall Management and Monitoring Plan (oOMMP) [AS-073]; the draft CEMP [AS-057]; Commitments Register [AS-125]; and the Preliminary Ecological Appraisal [AS-072].
5.15	Applicant, NE	Protected species licence applications

		<p>Please provide an update on progress of the draft protected species licence applications.</p> <p>To the Applicant only – please confirm when updated amendments to the vole and bat method statements will be provided (if not done so already) to NE and do you intend to update them in line with NE's recommendations?</p>
5.16	CCoC	<p>Impact on protected species</p> <p>It is stated in your RR [RR-001] that there is insufficient evidence provided by the Applicant to demonstrate the impact of the Proposed Development on foraging / commuting bats and that there is insufficient evidence to demonstrate that mitigation is adequate and can be delivered for water voles. If the Applicant updates its method statement for the water vole and bat licence applications in accordance with the recommendations from NE, would this satisfy your concerns?</p>
5.17	Applicant	<p>Bat surveys</p> <p>Please respond to concerns raised on the limitations and extent of surveys for bats, particularly in relation to roosting and foraging (e.g. [RR-001 and RR-083]).</p>
5.18	Applicant	<p>Effects of operational lighting on bats</p> <p>With reference to the comments raised on the effects of operational lighting on bats (e.g. [RR-001] and [RR-015]) please provide further details of the operational lighting and how the identified mitigation measures would be implemented and secured?</p>
5.19	Applicant	<p>Effects</p> <p>The summary and conclusion of ES Chapter 8 [AS-026] suggests that the impact of the loss of habitats is reduced from a significant adverse effect to non-significant following mitigation. However, Table 5-1 summarising the effects confirms a residual effect of moderate adverse (significant) for loss of ditch habitats. Please provide further clarification on this matter.</p>
5.20	Applicant	<p>Effects</p> <p>The summary in ES Chapter 8 [AS-026] suggests that all significant effects identified from operational activities are mitigated, and reduce the impacts to non-significant. However, the conclusion of ES Chapter 8 suggests that the residual effect of operational impacts through scour (directly and indirectly) upon the River Cam CWS remain significant. Please clarify.</p>
5.21	Applicant, NE, CCoC, CCC, SCDC	<p>Introduction of reed bed system at the proposed outfall</p> <p>EA [RR-013] recommends the inclusion of a reed bed system being implemented at the exit of the outfall, before reaching the watercourse, in order to keep a steady discharge flow and keep the water clean. Do you agree with / have any comments or concerns regarding this suggestion?</p>
5.22	Applicant	Loss of reed habitat

		In para 4.2.59 of ES Chapter 8 [AS-026] it is acknowledged that <i>There will be an overall loss of 50m2 of reed and despite the embedded measures there would still be a change of up to 70m from natural riverbank to modified river bank which is permanent.</i> Given that NPSWW states that applicants should demonstrate that habitats will, where practicable, be restored after construction works have finished, why is there an overall loss of 50m2 of reed? Are there further opportunities for replacement reed to compensate for this loss?
5.23	Applicant	Impacts on reed habitat ES Chapter 8 [AS-026] states that (4.2.148) <i>Areas of marginal vegetation (reed) will be moved to nearby downstream location (as directed by the ECoW) to replicate available habitat that would otherwise be lost due to the construction of the treated effluent discharge outfall. This will be included in the OMMP.</i> This indicates a like for like replacement of reed. However, para 4.2.59 states that there would be a loss of 50m2 of reed – please clarify. If there is not a like for like replacement of reed habitat, does this affect the finding of a residual effect of neutral which is not significant on aquatic species-fish (or any other impacts affected by this finding)?
5.24	Applicant	Ecological mitigation, compensation and enhancement measures Please provide a table which clearly and separately sets out the proposed ecological mitigation, compensation and enhancement measures. This is required in order to clarify the proposed BNG enhancements, in comparison to mitigation or compensation for loss of habitats.
5.25	Applicant	Biodiversity Net Gain How has a 20% minimum BNG across all unit types been determined? Are there any policy grounds this is based on?
5.26	Applicant	Biodiversity Net Gain – river units The BNG Assessment Report [AS-161] states that Schedule 2 of the dDCO would commit the Proposed Development to achieving 20% gain in river units and avoid a trading down in habitat value. However, R11(2) of the dDCO excludes river units, and R10(4)(e) does not specify the minimum biodiversity net gain comprising river units. a) Please therefore explain how the proposed 20% BNG relating to river units would be captured by the dDCO? b) Should river units be captured via a legal agreement i.e. a Section 106 Agreement, as suggested by SCDC [RR-004]? c) Please explain how the 20% BNG set out in R11(2) of the dDCO [AS-139] meets the 6 tests for conditions set out in para 56 of the NPPF?
5.27	Applicant	Biodiversity Net Gain – river units

		The BNG Assessment Report [AS-161] states that the 20% BNG for river units would be in part delivered through the creation of additional extents of river habitat through funding offsite habitat creation/ restoration initiatives. It is stated that this would either be from a supplier of BNG credits or the habitat creation would be funded directly to generate the units. It is stated that is that <i>river unit credits are not currently available on the market, but are likely to be in the near future</i> . This provides little certainty regarding the timescales in which the river units could come forwards, if at all. Please provide more detail on the likelihood of river units coming forwards and what mechanisms can be put in place in the event that they did not come forwards to ensure the proposed 20% BNG.
5.28	Applicant	<p>Biodiversity Net Gain – river units</p> <p>The BNG Assessment Report at para 1.2.1 of appendix C [AS-161] states that <i>although it is currently predicted that the Proposed Development will achieve more than 20% gain in all non-river habitat types, the river unit gain will be 4.30%</i>. Para 1.2.2 goes on to state that <i>In order to achieve a 20% BNG on river units the following is required: • 0.03 BNG river units delivered on the River Cam (or a river/watercourse in Cambridgeshire) to deliver on 'high distinctiveness'; and • 1.75 BNG units delivered via the creation of at least 227m of ditches which hold water all year</i>. The ExA require further clarity on the following matters:</p> <ul style="list-style-type: none"> a) on page 'v' and in para 5.2.2 of the same report, the percentage increase in river units is suggested to be 3.49%, not 4.3% - which is correct, please update the document; b) does the proposal, without any offsite mitigation currently result in a net biodiversity gain in river units of 4.3% (or 3.4%); and c) as the 227m of ditches is proposed to be delivered on-site, is it the 0.03 BNG river units delivered on the River Cam which need to be delivered offsite to achieve a BNG of 20% for river units?
5.29	Applicant	<p>Biodiversity Net Gain and the dDCO</p> <p>Please confirm how the proposed BNG Audit Survey to review the delivery of the habitat creation and enhancement and to determine whether BNG is on track to be achieved at the end of the 30-year period would be secured through the dDCO.</p>
5.30	Applicant	<p>Biodiversity Net Gain and compulsory acquisition</p> <p>To what extent could BNG be achieved without the compulsory acquisition of land – i.e. what percentage of BNG could be achieved?</p>
5.31	Applicant	<p>Above ground air value structures</p> <p>The BNG Assessment Report [AS-161] states that 16 above ground air valve structures are not considered. Please confirm the likely scale of these structures and provide further detail on why they have not been considered.</p>
5.32	Applicant	<p>Discharging proposed ecological requirements</p> <p>At various points within ES Chapter 8 [AS-026], it is stated that 'various consultees' would be consulted in order to discharge proposed ecological requirements. Please provide details of who are the likely consultees for discharging requirements.</p>
5.33	Applicant	Reinstatement of habitats

		There is a lack of specificity regarding the timescales for the reinstatement of habitats set out within ES Chapter 8 and the CoCP Part A. Please can this be made more specific.
5.34	EA, NE, WTBCN	Otter habitat ES Chapter 8 Section 3.1.50 [AS-026] states that evidence of otter was found during surveys in 2021 and 2022 along the watercourses and ditches and the River Cam within the survey area. It goes on to state that suitable terrestrial habitat is limited for otter holts around the proposed treated effluent discharge outfall to the River Cam. Do you agree with this statement?
5.35	Applicant	Impacts to designated sites through increase in flood levels NE suggests that ES Chapter 8 [AS-026] does not appear to identify impacts to designated sites through increase in flood levels and that the Flood Risk Assessment (FRA) included in Appendix 20.1 of the Environmental Statement [APP-151] has not assessed the increases in downstream flood levels identified through hydraulic modelling in the Fluvial Model Report [ES Appendix 20.6 [AS-113]. Please explain why these impacts have not been assessed.
5.36	SCDC, CCC	Review of ES Chapter 8 Biodiversity appendices Have Appendix 8.4: Ornithology Baseline Technical [APP-089] and Appendix 8.8: Badger Technical Appendix [APP-093] now been reviewed and do you have comments on these documents?
5.37	Applicant	Mitigation NE has requested [RR-015] that species mitigation, including for water voles, should be managed for the operational duration of the project, being secured through the LERMP. Can you confirm that this would be the case and that the LERMP will be updated accordingly? Please provide a timescale for this.
5.38	NE, EA	Mitigation Do you agree with the Applicant that mitigation measures related to the construction of the proposed River Cam outfall (to be set out within a detailed outfall management and monitoring plan (OMMP) – see p69/70 of [AS-026] / the outline OMMP [AS-073]) can be satisfactorily secured through a flood risk activities permit? Are proposed works in the area of the outfall, but not covered by the permit secured through the OMMP, satisfactorily secured by the CoCP Part A [APP-068]?
5.39	NE, WTBCN, CCoC, CCC, SCDC	Effects - habitats In reference to the impacts of the Proposed Development on habitats within ES Chapter 8 [AS-026], do you agree that the residual effect on habitats would be moderate beneficial (significant)?
5.40	Applicant	Impact of testing and commissioning on water quality ES Chapter 8 para 4.1.142 [AS-026] states that <i>Following completion of the outfall there would be a testing and commissioning phase for the proposed WWTP. This will include a short period of up to 6 months when both the existing and proposed outfalls are operating. This may result in short term intermittent reduction in water quality within the reach to Baits Bite Lock.</i>

		Please provide further information on the potential short-term reduction in water quality, whether this is considered to be significant and what impact this could have on protected fish species. Please give further information on how this could be mitigated.
5.41	WTBCN, CCoC, CCC, SCDC	<p>Protection of reptile species</p> <p>Are the mitigation measures proposed to protect reptile species set out within ES Chapter 8 [AS-026] (and detailed within the CoCP Practice Part A [APP-068] and the Reptile Mitigation Strategy within the LERMP [AS-066]) sufficient to ensure that reptile species present would be protected from killing or injury? Do you agree with the Applicant that the impact on reptiles directly and their habitats from construction is neutral?</p>
5.42	Applicant	<p>Mitigation</p> <p>In ES Chapter 8 [AS-026] there are a number of instances where the Applicant proposes mitigation measures <i>if feasible or if possible</i> (e.g. para 4.2.236 <i>if feasible, suitable habitat for breeding birds, including hedgerows, will be cleared between October and mid-February (outside of the breeding bird season)</i>).</p> <p>a) What would be the impacts of construction if these measures are deemed not feasible at the time? If the mitigation measures are not feasible, does this impact on the conclusions within the ES regarding significance of effects?</p> <p>b) What other mitigation / solutions are proposed to ensure protection of the relevant species / habitats?</p> <p>c) Where parameters are secured through the terms of the CoCP - please explain how the design envelope assessed in the ES would be committed to where measures being employed are described as 'where feasible' or 'if possible' as this flexibility is not contained in the ES?</p> <p>d) Please provide details of where the parameters and assumptions in the biodiversity assessment are secured within the dDCO in each case?</p>
5.43	Applicant	<p>Replacement of hedgerow</p> <p>ES Chapter 8 [AS-026] confirms at para 4.2.325 that there would be a small area of habitat loss expected near to the Milton Road Hedgerows City Wildlife Site where there would be a need to remove a small section of hedgerow for access/construction works to the existing WWTP. Please confirm whether it is intended to replace the hedgerow following completion of works at the existing WWTP, noting that there is a presumption in NPSWW that habitats will, where practicable, be restored after construction works have finished.</p>
5.44	Applicant	<p>Impact on hedgerow</p> <p>ES Chapter 2 [APP-034] notes that the working width for pipeline crossings of ditches and hedgerows during construction would be 'approximately 6m' wide. ES Chapter 8 [AS-026] however assesses 'up to 6m' as the maximum for the purposes of the assessment but the CoCP Part B [AS-161] only refers to reducing hedgerow removal 'where feasible'. Please confirm that the maximum working width would be committed to by supplying details and / or cross sections to demonstrate how it would be achieved? How and where it would be secured?</p>
5.45	Applicant	Design of the discharge point and permitting

		Has the design of the discharge point been discussed with the relevant consultation bodies? What progress has been made on design of the outfall to mitigate effects of scouring? Please provide an update on progress with the Environmental Permit(s) for the construction and operation of the outfall to the River Cam.
5.46	EA	Computer modelling of storm discharges and normal river flow ES Chapter 8 [AS-026] suggests that further Computational Fluid Dynamics modelling of the impact of maximum storm discharges and normal river flow conditions on the riverbank are required in order to inform final outfall design (in relation to the impacts of scour on the River Cam CWS). Do you consider that additional modelling could be secured through the dDCO, or whether this should be provided during Examination for consideration?
5.47	EA	Control of effluent load and water quality ES Chapter 8 para 4.3.29 [AS-026] states that <i>the environmental permitting framework will ensure that the effluent load (including agents added to reduce nitrate and phosphate load) being discharged to the River Cam from the proposed WWTP would never exceed the effluent load under currently consented limits for the existing WWTP. There will also be a reduction in storm water discharges from the proposed WWTP. Therefore, there would be no additional water quality impacts on these sites once the proposed WWTP is operating and hence no further impacts on biodiversity.</i> a) Please confirm that the permitting framework would be able to control the effluent load in the manner purported by the Applicant and whether you agree with the Applicant's conclusions regarding impacts on water quality? b) Given that the Applicant asserts that the quality of the effluent load would be no worse than the existing arrangements at the existing WWTP, to what extent can this be considered a benefit?
5.48	Applicant	Effects - aquatic habitats ES Chapter 8 [AS-026] concludes that with mitigation, there would be no likely significant effects on biodiversity receptors. However, with regard to the impact on and removal of aquatic habitats during construction, there would be a residual significant adverse effect – please therefore justify the conclusion that there are no likely significant effects on biodiversity receptors. Are further compensation measures possible to mitigate the harm?
5.49	Applicant	Determination of construction widths Please demonstrate how the construction widths have been determined with regard to ecological impacts and demonstrate that they are the minimum necessary for the Proposed Development; for example the construction width is up to 30m for the Waterbeach pipeline whereas the construction width for the treated effluent pipeline is up to 50m.
5.50	Applicant	Loss and disturbance of habitats Please demonstrate how the loss or disturbance of habitats is the minimum required to facilitate the Proposed Development, notably in relation to the permanent loss of up to 70m habitat along the River Cam and temporary disturbance of 25m of ditch habitat.
5.51	Applicant	NPSWW Regarding NPSWW Accordance Table [AS-130] - Biodiversity: a) please demonstrate how the Proposed Development has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests;

		<p>b) there is no consideration of the Proposed Development against para 4.5.12 (regional and local sites) of NPSWW and how the proposal would meet with the requirements of this policy – please update accordingly;</p> <p>c) there is a lack of reference to veteran trees under para 4.5.13 which are located within the proposed order limits – please update accordingly;</p> <p>d) please demonstrate how the Proposed Development would meet with the requirements of para 4.5.14 of NPSWW;</p> <p>e) please demonstrate how the Proposed Development has ensured that activities would be confined to the minimum areas required for the works in accordance with para 4.5.17 of NPSWW;</p> <p>f) please outline mitigation measures which have been agreed with NE and whether they have been granted or refused, or intend to grant or refuse, any relevant licences, including protected species mitigation licences not already covered within the ES.</p>
5.52	Applicant	<p>Conformity of mitigation measures within ES Chapter 8 and the CoCP Part A</p> <p>Some of the mitigation measures proposed within ES Chapter 8 [AS-026] do not wholly tie up with the mitigation measures contained within the CoCP Part A [APP-068]. For example, the mitigation measures detailed in para 4.2.286 of ES Chapter 8 regarding badgers do not wholly accord with the mitigation measures set out in para 7.2.31 of the CoCP Part A. Please review both of these documents carefully and update all areas where there are discrepancies of this nature across all biodiversity receptors.</p>
5.53	Applicant	<p>Mitigation</p> <p>Para 4.2.51 of ES Chapter 8 [AS-026] states that <i>Other habitats will be reinstated on a site-specific basis, informed by detailed preconstruction surveys and will be set out within the CEMP (to be prepared by the contractor)</i> – please signpost to where this is secured.</p>
5.54	Applicant	<p>Mitigation</p> <p>Para 4.2.235 of ES Chapter 8 [AS-026] states <i>All hedgerows removed during construction will be reinstated</i> – please signpost to where this is secured for all parts of the Proposed Development.</p>
5.55	Applicant	<p>Mitigation</p> <p>Para 3.2.10 of ES Chapter 8 [AS-026] states that <i>Water vole ditch network: changes in water levels to wetter winters and drier summers may affect the habitat within the water vole ditch network being created. Management of water levels alongside IDB water level management for optimal water vole habitat will be required to provide long-term habitat resources for water vole</i> – please signpost to where this is secured.</p>
5.56	Applicant	<p>Mitigation</p> <p>Please demonstrate where the mitigation commitments and parameters set out in ES Chapter 8 [AS-026] Table 2-10, are secured.</p>
5.57	Applicant	<p>Mitigation</p> <p>Please provide details of how coastal and floodplain grazing marsh and fields supporting important arable flora would be reinstated following construction.</p>
5.58	Applicant	River crossings

		ES Appendix 8.1 [APP-086] states that the Waterbeach pipeline would cross the River Cam by trenchless methods and ES Chapter 2 [APP-034] notes that this is shown on Sheet 11 of the works plans [AS-150]. The aquatic ecology assessment assumes there would be no impact on the river. Sheet 9 of the works plans, however, demonstrates two crossings of the River Cam by the pipeline. Please confirm whether both crossings are to be carried out by trenchless methods? If not, has the biodiversity assessment taken account of the possibility of an alternative crossing method?
5.59	EA	Impact on Wicken Fen Ramsar / Fenland Special Area of Conservation NE consider in its RR [RR-015] that there would be no likely significant effect on Wicken Fen Ramsar / Fenland Special Area of Conservation, subject to agreement from the EA – do you agree?
Questions relating to Habitats Regulations Assessment (HRA)		
5.60	Applicant, NE	To the Applicant: ES Chapter 8, para 3.1.45 [AS-026] notes a cluster of records for barbastelle bat along the disused railway line. ES Appendix 8.7 [APP-092] concludes these records are within the foraging range of Eversden and Wimpole Woods Special Area of Conservation (SAC). The HRA Screening Report [AS-068] concludes that there is no ecological connectivity between the Proposed Development and the SAC. Please provide an explanation for the discrepancy in these conclusions. To Natural England: Please comment on the relevance of these findings in relation to your agreement to the conclusions of no Likely Significant Effects on the barbastelle feature of Eversden and Wimpole Woods SAC.
5.61	The Applicant	Please provide corrections to the HRA Screening Report [AS-068] and HRA Report [AS-070] to address discrepancies noted between the distances of the Devil's Dyke SAC site from the Proposed Development provided in the two reports.
5.62	NE	The Applicant has provided an updated HRA Screening Report [AS-068] and HRA Report [AS-070]. Please confirm whether the comments raised in your RR [RR-015] are maintained in light of this?
6. Carbon emissions and climate change mitigation and adaptation		
6.1	Applicant	Drafting error The figures for the proposed net zero carbon emissions for both the preferred option and CHP option are different in the summary and conclusion sections of ES Chapter 10: Carbon [APP-042] – please ensure that these are corrected throughout the document.
6.2	Applicant	National Adaption Programme 2023 To what extent does the publication of a new National Adaption Programme in July 2023 from DEFRA affect the Proposed Development and the findings on climate change adaption measures contained within the ES? Is this likely to result in improved climate change mitigation measures through the regulatory processes which could affect the Proposed Development?
6.3	Applicant	NPSWW Please demonstrate how the Proposed Development complies with bullet point 6 of para 2.2.3 of NPSWW.
6.4	Applicant, SCDC	South Cambridgeshire Local Plan

		South Cambridgeshire Local Plan policy CC/4 requires that for non-residential development, an application must be accompanied by a water conservation strategy which demonstrates a minimum water efficiency standard equivalent to the BREEAM standard for 2 credits for water use levels unless demonstrated not practicable. Would it be practicable to provide this for the Proposed Development (such as for the office building / discovery centre / workshop) - why / why not? If practicable, could it be included as a requirement for the detailed design stage – if so, please suggest potential wording for the dDCO.
6.5	Applicant, CCoC	Clarification of information – [RR-001] CCoC's RR [RR-001] seeks clarification regarding ES Appendix 10.1 GHG Calculations [APP-109] – please liaise with one another to establish what clarification is required and suitably address this matter.
6.6	Applicant	NPSWW Please explain how the ES demonstrates that there would be no critical features of the Proposed Development which might be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections in accordance with NPSWW para 3.6.10?
6.7	Applicant	UK Climate Change Risk Assessment 2022 ES Chapter 9: Climate resilience [APP-041] is informed by the second UK Climate Change Risk Assessment (DEFRA, 2017). Para 3.6.11 of NPSWW requires that adaption measures should be based on the Government's latest national Climate Change Risk Assessment, and a more up-to-date version was published in January 2022. Why was the 2022 Risk Assessment not utilised to inform the ES and how does this more recent Risk Assessment affect proposed adaption measures and findings of the ES?
6.8	Applicant	Effects - GHG emissions The IEMA Environmental Impact Assessment Guidance to Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022), which has been used to assess the impacts of the Proposed Development on carbon emissions, states that <i>...in the absence of any significance criteria or defined threshold, it might be considered that all GHG emissions are significant...</i> Please therefore justify how the significance table 2-1 within ES Chapter 10 [APP-042] has therefore been derived.
6.9	Applicant	Impacts on carbon from land use change Please justify the conclusion in para 4.3.6 of ES Chapter 10 [APP-042] that the impacts on carbon from land use change would be moderate adverse and not significant? To what extent can the Applicant ensure that the deciduous woodland would ensure overall net carbon benefits on land use from year 11 of planting?
6.10	Applicant	Baseline carbon emissions Regarding the baseline for carbon emissions (which uses a pre-value-engineered early view of how the existing WWTP would likely have been re-built through conventional processes and approaches) set out in ES Chapter 10 [APP-042]: a) Please confirm whether this baseline considers rebuilding the WWTP at the proposed or existing WWTP site?

		<p>b) Please confirm if the DM0 baseline is for the present day (rather than a 2010 baseline which is referred to a number of times within the ES – if a 2010 baseline was used, please justify this approach)?</p> <p>c) Please explain why a baseline which assumes the WWTP would be rebuilt was used as opposed to a baseline of the current operation of the existing site, given that in the event that this application for a DCO is not granted, and no other planning application to relocate the existing WWTP is successful, the WWTP would remain at the existing site. The ExA draws the Applicant's attention to the IEMA Environmental Impact Assessment Guidance to Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022) which states that baseline emissions should be considered as the existing emissions from the project boundary prior to the construction and operation of the project.</p>
6.11	CCC, CCoC, SCDC	<p>Baseline carbon emissions</p> <p>To what extent do you consider the DM0 baseline being representative of "existing" conditions, when this includes rebuilding the existing treatment plant (rather than using existing carbon emissions from WWTP / upgrading as necessary to meet population demands at existing site)?</p>
6.12	Applicant	<p>Alternative emissions – optimisation of the existing WWTP</p> <p>The IEMA Environmental Impact Assessment Guidance to Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022) suggests reporting on the Alternative Emissions (including future baseline emissions should the project be developed) – please provide detailed information on the scenario of the existing WWTP (and/or with upgrades to the Waterbeach Water Recycling Centre) being optimised for carbon where the works are upgraded at the existing site to serve the projected population equivalent from the same geographical areas, with the improved treatment standards proposed and the gas to grid export developed (if this is possible at the existing site). The ExA seeks to understand how retention of the existing site(s) with upgrades compares to the Proposed Development.</p>
6.13	Applicant	<p>Existing WWTP - CHP</p> <p>Does the existing WWTP have an on-site CHP which uses biogas generated by sludge treatment?</p>
6.14	Applicant	<p>Operational phase carbon impacts</p> <p>Para 4.4.4 of ES Chapter 10 [APP-042] does not appear consider the impacts of the Proposed Development from the operational phase from a worst-case scenario basis i.e. use of CHP. The CHP option appears to be modelled on the DM0 with a basic scheme only, but not with the Proposed Development. Please confirm the impacts of the CHP option and the Proposed Development, the significance of impact and residual effects.</p>
6.15	Applicant	<p>Decommissioning carbon impacts</p> <p>Table 4-7 of ES Chapter 10 [APP-042] considers the potential emissions from decommissioning, which focuses on transportation impacts, which are described as <i>the main activity</i>. What other activities could generate carbon impacts (e.g. use of electricity to power equipment to carry out this work, waste disposal)? If there are others, please demonstrate how these are considered within the ES.</p>
6.16	Applicant	Effects - decommissioning

		Please justify the conclusion in para 4.5.6 of ES Chapter 10 [APP-042] that the decommissioning effects would not be significant, in the context that the relevant guidance states that it might be considered that all GHG emissions are significant, noting that there would be 13 tCO ₂ e produced during this stage.
6.17	Applicant	Clarification of information What do the 'addition items' in Table 4-1 of ES Chapter 10 [APP-042] refer to and why are they not included in the dDCO design?
6.18	Applicant	Whole life carbon assessment - ES Chapter 10 [APP-042] a) Please confirm which years the whole life carbon assessment considers - the text in section 4.6 page 41 states the whole life carbon assessment is up to 2057 based on a 30 year operation period, while the title of Table 4-8 on page 42 suggests figures presented in Table 4-8 are until 2080. b) Please justify why is the whole life carbon assessment been taken up to 2057/2080 (see above question) and not to 2090s as this is the designed operational life of the Proposed Development? c) SCDC state [RR-004] that whilst there are no plans to decommission or demolish the Proposed Development at present, this should be factored into the whole life carbon assessment. The ExA appreciate that whilst the Applicant has no current plans to decommission the Proposed Development, it nevertheless would be decommissioned one day. On this basis, in order to form a "whole life" assessment, should the decommissioning of the Proposed Development therefore not form part of this assessment? If not, please justify why not. d) SCDC [RR-004] suggest that the operational impacts should be assessed until the future baseline of 2090's to align with ES Chapter 9: Climate Resilience. Why was this not considered appropriate?
6.19	Applicant	Existing WWTP – operationally net zero Could the existing WWTP (and / or the Waterbeach Water Recycling Centre) be made operationally net zero? Are there any legislative or other commitments which would require the existing site(s) to operate with net zero carbon emissions, and if so, within what time frame?
6.20	Applicant	Energy consumption Para 1.8.5. of ES Chapter 2 [APP-034] states that for the proposed WWTP it is envisaged that a Membrane Aerated Biofilm Reactor (MABR) configuration would be used to ensure low energy utilisation for maximum oxygen transfer but that other process options remain a potential. What other configurations could be used, and what impacts are these likely to have on energy consumption? Have other options with more energy consumption been assessed within the ES?
6.21	Applicant	Carbon Management Plan R21 of the dDCO [AS-139] requires the provision of a detailed Carbon Management Plan before the gas recovery plant is operated. a) Please explain why the operation of the gas recovery plant, rather than the first operation of the proposed WWTP would be the trigger for submission of the Plan, given that the proposed operational carbon neutrality of the

		<p>proposed WWTP would not solely rely on the gas recovery plant and noting that ES Chapter 10 [APP-042] states that the Plan would need to be agreed prior to the operation of the proposed WWTP.</p> <p>b) What happens to gas if the rest of the site becomes operational prior to submission of the Carbon Management Plan? How is this assessed within the ES?</p> <p>c) How would carbon emissions during commissioning and operation be monitored prior to the use of gas recovery plant and mitigated to ensure carbon neutrality?</p>
6.22	Applicant	<p>Carbon reduction targets</p> <p>Para 3.3.1 of ES Chapter 10 [APP-042] states that the project adopts a construction reduction target of 70% less than the 2010 construction baseline. Does this target align with current carbon reduction Government objectives, given that the Climate Change Committee's Carbon Budget requires a reduction in emissions by 78%? To what extent can the Applicant provide assurances that a 70% reduction would be achieved at the detailed design stage (over the current 50% confirmed reductions) as stated within ES Chapter 10 when this does not appear to be controlled through the dDCO, and to this end, to what extent can benefits be offered to a 70% reduction in construction emissions?</p>
6.23	Applicant	<p>Carbon Budget Delivery Plan 2023</p> <p>Does the Proposed Development accord with Carbon Budget Delivery Plan March 2023, for example, in the use of Advanced Anaerobic Digestion for sludge treatment / alternative ammonia removal processes? Please demonstrate how this has been considered within the ES.</p>
6.24	Applicant	<p>Effects of climate change on carbon emissions</p> <p>Has ES Chapter 10 [APP-042] considered the impacts of climate change and the potential increased carbon emissions which may be generated, such as future fitting of cooling equipment to the digesters if required?</p>
6.25	Applicant	<p>Future plant expansion</p> <p>Has potential future expansion of the proposed WWTP been considered in ES Chapter 10 [APP-042]?</p>
6.26	Applicant	<p>Mitigation</p> <p>Please specify where the mitigation measures proposed in para 4.2.13 of ES Chapter 10 [APP-042] are secured – Table 5-2 suggests a requirement in the dDCO [AS-139] to update the carbon model though there is no reference to carbon modelling in the dDCO.</p>
6.27	Applicant	<p>Mitigation</p> <p>Please specify where the mitigation measures proposed in para 4.2.15 of ES Chapter 10 [APP-042] are secured – Table 5-2 suggests a requirement in the dDCO [AS-139] to require the Gateway building to achieve BREEAM 'Excellent', though there is no apparent reference to BREEAM standards in the dDCO.</p>
6.28	Applicant	<p>BREEAM</p> <p>Cambridge Local Plan 2018 requires that all new non-residential buildings are built to achieve BREEAM 'excellent'. Whilst ES Chapter 10 [APP-042] suggests that the Gateway building would meet this target, there is nothing to suggest that the proposed Workshop Building would achieve the same standard – please justify why this is the case.</p>
6.29	Applicant	<p>Operational carbon emissions</p>

		Please confirm whether the Waterbeach effluent pumping station has been included within the operational carbon emissions produced within ES Chapter 10 [APP-042]?
6.30	Applicant, National Grid, Cadent Gas Limited	Capacity / ability of the gas network to accept biogas generated by the Proposed Development The Applicant proposes that biogas generated by the Proposed Development would be exported to the UK gas grid. Please confirm whether the gas grid system in the Cambridgeshire catchment area would be capable of accepting biogas of the extent proposed? Is there any risk that transferring biogas to the gas grid would not be possible or cease within the future?
6.31	Applicant	Mitigation Para 7.9.21 of the CoCP Practice Part A [APP-068] requires the Principal Contractor to put in place measures to minimise energy consumption and carbon emissions during construction. How is this secured through the dDCO [AS-139], noting that R9 does not make reference to the provision of a management plan relating to energy consumption or carbon emissions?
6.32	Applicant	Strategic Carbon Assessment To what extent has the significance of effects from the findings of the Strategic Carbon Assessment [APP-206] been considered as part of the ES?
6.33	Applicant	Strategic Carbon Assessment The Strategic Carbon Assessment [APP-206] states that for the counterfactual model, operational carbon site consumption has been discounted because of the decarbonisation of the electricity grid in the future. However, this would not be until at least 2035 – has this been factored into the model?
6.34	Applicant	Strategic Carbon Assessment Given that there is uncertainty regarding the operational energy use (i.e. use of biogas upgrading plant or CHP plant) and the future carbon environment, please can the Conservative and Optimistic scenarios of the CHP plant use under zero carbon policies and the biogas plant use under mid-point scenario be modelled and provided. This is requested for both the counterfactual scenario and Proposed Development.
6.35	Applicant	Strategic Carbon Assessment Save Honey Hill Group [RR-035 Section 9.2] suggest that the Strategic Carbon Assessment [APP-206] does not account for commuting, construction vehicle movements, housing development or demolition of the Proposed Development – please provide a response to this.
6.36	Applicant	Strategic Carbon Assessment To what extent does the Strategic Carbon Assessment [APP-206] consider the embodied carbon of the existing WWTP? Please justify the approach taken in this regard.
6.37	Applicant	Strategic Carbon Assessment What assumptions does the Strategic Carbon Assessment [APP-206] make regarding the proposed WWTP and housing – are these generic sewerage plant / housing designs, or ones where emissions have been designed to be minimised?

6.38	Applicant	Strategic Carbon Assessment Does the Strategic Carbon Assessment [APP-206] take into consideration the demolition and decommissioning of the existing Waterbeach Water Recycling Centre? Please justify the approach taken in this regard.
6.39	Applicant	Construction carbon emissions Does the construction of either the Applicant's preferred option (gas to grid recovery), or the CHP option result in different carbon emissions during construction – if so, please provide a table setting out the different carbon emissions for each option based on Table 4-1 in ES Chapter 10 [APP-042]. How has the carbon emissions for proposed solar panels been calculated in terms of carbon emissions within Table 4-1 of ES Chapter 10 as the quantity and extent of the solar panels is not fixed – is this based on a maximum parameter, if so, please confirm what this is and what is the likely generating capacity.
6.40	Applicant	Energy generation Please identify where the potential on site energy generation capacity is quantified and whether this is sufficient to provide the energy requirement of the Proposed Development?
6.41	Applicant	Water sector carbon emissions Please confirm what percentage the preferred and CHP option's net carbon emissions are of the estimated UK water sector emissions.
6.42	Applicant	Carbon Management Plan ES Chapter 10 [APP-042] para 5.1.4 confirms that the CHP option would have a whole life net impact of the production of 71,480 tCO ₂ e and this it to be mitigated using an operational Carbon Management Plan. An outline Carbon Management Plan is provided with the application [AS-076]. This implies that carbon emissions would not be monitored for the preferred option. a) How would carbon emissions for both options be monitored during construction, commissioning and decommissioning and then offset, through an <u>operational</u> carbon management plan? b) R21 of the dDCO [AS-139] requires the Proposed Development to be <u>operationally</u> net zero - how does this ensure that carbon emissions from construction, commissioning and decommissioning (of the existing WWTP) would be satisfactorily offset? c) Does R21 of the dDCO [AS-139] sufficiently allow for updates to the management and operation of the Proposed Development to reduce carbon emissions to meet any future carbon legislative requirements? d) According to the outline carbon management plan [AS-076], the operational carbon footprint of the Proposed Development would be reported in line with regulatory requirements - how would net emissions from construction, commissioning and operation be monitored and who would this information be provided to? What would happen if net zero carbon emissions for either option were not being achieved (either operationally or when considering the construction, commissioning and decommissioning of the site for either option)?
6.43	Applicant	Carbon Management Plan

		Outline Carbon Management Plan [AS-076] para 3.3.9 states that updates will be provided on new best practise methods to improve process emissions from water regulators within the detailed Carbon Management Plan. When are the regulators likely to offer advice on this matter?
6.44	CCC, SCDC, CCoC,	Carbon Management Plan Please review and provide comments on the acceptability of the outline Carbon Management Plan [AS-076].
6.45	Applicant	Alternatives to exporting gas to the grid Please respond to CCC's comment [RR-001]: <i>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.</i>
6.46	Applicant	Carbon emissions from sludge deliveries How have the carbon emissions from the deliveries of sludge been assessed within ES Chapter 10 [APP-042]? Could changes in delivery patterns over time (e.g. more deliveries from satellite sites further afar) increase carbon emissions to the extent that the Proposed Development operates outside of the impacts assessed within the ES? To this end, should deliveries of sludge and where they originate from be controlled through the dDCO? Should there be a definite commitment to utilise a low or zero emission vehicle fleet for example?
7. Community		
7.1	Applicant	Clarification – River Cam works Para 4.2.28 of ES Chapter 11 Community [AS-028] states that <i>Section 3.1 of the CoCP Part B (Appendix 2.2, App Doc Ref 5.4.2.2) includes limiting the construction activity in the river to between mid-June and early September and defining a minimum river width that must be retained throughout the duration of the construction.</i> PDF Page 11/40 of CoCP Part B [AS-161] states that <i>works are planned for July to October.</i> PDF Page 9/40 of CoCP Part B states that <i>core working hours for winter and summer will be complied with.</i> In the UK winter starts on 1 December and ends on the last day of February. Please clarify the period within which works to the River Cam would take place and ensure consistency between applicant documents. If CoCP Part B is to be re-issued please correct the internal page numbering and ensure that it is fully searchable.
7.2	Applicant	Clarification – incomplete paragraph On page vi of ES Chapter 11 [AS-028] it is stated that <i>The public right of way (PRoW) 85/6 along the east bank of the River Cam would be temporarily diverted for a period of up to 4 months for approximately 770m around the land temporarily required for construction of the outfall. It is assessed that there would be a temporary neutral effect on the users of -</i> Please complete this paragraph.
7.3	Applicant	National policy Does para 1.3.3 of ES Chapter 11 [AS-028] relate to the NPPF? If so, there appear to be discrepancies in the section titles and paragraph numbers referred to. Please address this.
7.4	Applicant	Clarification – employment numbers

		<p>Para 4.2.3 of ES Chapter 11 [AS-028] says that construction employment would peak at 60 supervisory and administrative staff and 300 staff. Para 3.10.2 of ES Chapter 2 [APP-034] says that construction employment would peak at 75 supervisory and administrative staff and 300 operatives. Para 6.2.1 of the Construction Workers Travel Plan [APP-150] says that during construction, 300 people on average are likely to be on site per day and that during the peak stage of construction (Q4 2026 to Q1 2027), this would rise to 422 people on site per day.</p> <p>a) Which is the correct figure for the peak: 360, 375 or 422 people?</p> <p>b) Is this figure solely for the proposed WWTP site or does it cover all works within the Order Limits?</p> <p>c) Please provide a breakdown of construction employment by work site (ie proposed WWTP, transfer tunnel, Waterbeach Pipeline and existing WWTP).</p> <p>d) Please confirm whether any of the submitted assessments or documents need to be amended in light of your response to a).</p>
7.5	Applicant	<p>Environmental Statement – Horningsea Road – clarification</p> <p>Para 4.2.45 of ES Chapter 11 [AS-028] states that <i>The sensitivity of pedestrians, cyclists and horse-riders using the section of Horningsea Road extending south by 755m from the junction with Horningsea Road are of high sensitivity...</i> - Please clarify the location of the junction referred to.</p>
7.6	Applicant	<p>Public rights of way – analysis of effects</p> <p>Part 1 of Schedule 6 of the dDCO [AS-139] sets out 'Public Rights of Way to be Temporarily Closed for which a Substitute is to be Provided'. The Schedule includes:</p> <ul style="list-style-type: none"> • Footpath FP247/10 between points R13 and R14 on sheet 9 of the rights of way plans [AS-153]; and • Footpath FP130/12 between points R11 and R12 on sheet 9 of the rights of way plans [AS-153]. <p>There is no analysis in ES Chapter 11 [AS-028] as to the impacts of the temporary closures or of any mitigation measures. Please update Chapter 11 accordingly.</p>
7.7	Applicant	<p>Public rights of way – provisions in the dDCO</p> <p>Part 1 of Schedule 6 of the dDCO [AS-139] refers to documents 4.6.2, 4.6.8, 4.6.9, 4.6.6. However, these are drawing numbers in Document 4.6 [AS-153]. The same is the case in other schedules when referring to other documents. Please amend the references in the dDCO as necessary.</p>
7.8	CCoC	<p>Draft Active Travel Strategy for Cambridgeshire</p> <p>This is listed by the Applicant under the heading 'Local Planning Policy' in ES Chapter 11 [AS-028]. Does the Draft Active Travel Strategy for Cambridgeshire include policies which should be taken into account in the determination of this application?</p>
7.9	Applicant	<p>Temporary and permanent requirements for land – proposed WWTP</p> <p>How would the vehicular access to Poplar Hall and Poplar Hall Farm be affected during the construction phase? How should the magnitude of any impact be categorised?</p>

7.10	Applicant	Environmental Statement – Community Facilities On page 11 of ES Chapter 11 [AS-028] it is not clear whether all potential receptors on the list collected by residents and provided by Fen Ditton Parish Council have been taken into account. Please confirm whether these have all been included or, if some have not been included, set out the justification for not including them.
7.11	Applicant	Proposed Discovery Centre On page 11 of Applicant Regard to Section 42 Consultation Responses [APP-167] it is stated that some respondents to consultation questioned the value of the Discovery Centre. As an alternative, has the Applicant considered delivering its educational programme by visiting schools and groups in their own premises rather than having schools and groups visit the proposed WWTP?
7.12	Applicant	Site of Proposed Development a) Is there any permitted recreational use of the site of the proposed WWTP at present? b) Are any other recreational facilities affected by the Proposed Development, whether temporarily or permanently? c) Are there any informal or permissive walking routes across the proposed WWTP site at the present time?
7.13	Applicant	Site of proposed WWTP – use of green space On page 10 of Applicant Regard to Section 47 Consultation Responses [APP-166] it is stated that: <i>...the Applicant confirms that the green space is not intended as a recreational destination in its own right, the aim is to create connectivity to the surrounding area.</i> - How would the proposed green space create connectivity when compared with the existing network of highways and PRoW?
7.14	Applicant, Conservators of the River Cam	Temporary disruption to the River Cam navigation Noting Table 2-7 (page 33 of ES Chapter 11 [AS-028]), para 3.1.30, para 4.2.22, para 4.2.25 and para 4.2.29: a) Whilst the number of university rowers might decrease during the summer university break, is there an increase in the use of the river by other parties during this time? b) If peak usage occurs from March to early November and the duration of construction is likely to be four months, is it possible or desirable for these works to take place from November to March? c) If so, how would this affect the magnitude of the impact? Would it reduce from 'significant'?
7.15	Conservators of the River Cam	Effects on the River Cam You expressed concern [RR-023] that this project would affect your ability of the to adequately fulfil your statutory responsibilities of navigation for this stretch of water during construction and that both the short-term and long-term consequences of the project may negatively impact the river, its banks, its ecology and the navigation of its users. a) What are the statutory duties that would be affected? b) What would be the effects on the statutory duties during the construction phase? c) What would be the effects on the statutory duties during the operational phase? d) What would be the consequences of not being able to fulfil your duties in whole or in part?
7.16	Applicant	Public rights of way – diversion (85/6 and 85/8)

		<p>At para 4.2.31 and 4.2.32 of ES Chapter 11 [AS-028] it is noted that <i>During the diversion there would be a period where use of the footpath 85/8 would cease due to the construction corridor related to the open cut construction of the treated effluent pipeline. This would require a longer diversion to the footway/cycleway along the western side of the carriageway to join the PROW 130/1 meaning users of the 85/6 would need to travel an additional 1010m to return to back to the 85/6 and that The magnitude of the impact is considered to be minor given the limited duration over which they are likely to be impacted. The diversion is unlikely to dissuade people from using these routes to access recreational opportunities.</i></p> <p>a) For how long would it not be possible to use footpath 85/8?</p> <p>b) Which carriageway is para 4.2.31 referring to?</p> <p>c) Why would the diversion be shorter for people coming from Horningsea (para 4.2.177 of ES Chapter 19 [AS-038])?</p> <p>d) The temporary closure of 85/8 and diversion to join 130/1 do not appear to be shown on Sheet 2 of the Rights of Way Plans [AS-153]. Should this be illustrated?</p> <p>e) The temporary closure of 85/8 and the 1,010m diversion are not listed in Part 1 of Schedule 6 of the dDCO. Should this be included?</p>
7.17	Applicant	<p>Public rights of way – diversions (generally)</p> <p>A number of the rights of way plans [AS-153] show a 'PUBLIC RIGHT OF WAY (TEMPORARY CLOSURE)' and a 'PUBLIC RIGHT OF WAY (INDICATIVE TEMPORARY DIVERSION)' close to / parallel with to each other. Does this represent a situation where gated access would be made available and the route would not be materially different to the existing route?</p>
7.18	Applicant	<p>Public rights of way – clarification regarding access (85/14 and 130/17)</p> <p>During works around the temporary site access to the proposed WWTP, would an alternative route be provided for recreational users of Low Fen Drove Way so that they could continue to access byway 85/14 and PRoW 130/17 when travelling from Horningsea Road? If so:</p> <p>a) can it be created on land that is or would be under the control of the Applicant;</p> <p>b) where would this diversion be located; and</p> <p>c) how would this diversion be secured?</p>
7.19	Applicant	<p>Public rights of way – diversion provisions in CoCP</p> <p>Para 7.6.15 of CoCP Part A [APP-068] states that: <i>the PRoW will either be temporarily diverted or if the route cannot be diverted temporarily stopped up.</i></p> <p>a) Would any PRoW be stopped up?</p> <p>b) If not, should the reference to stopping-up be omitted?</p>
7.20	Applicant	Public rights of way – severance during construction

		<p>Para 4.2.58 of ES Chapter 11 [AS-028] states: <i>Recreational users of PRow (130/16, 130/10, 130/6 and 130/8) to the east of Waterbeach may experience temporary disruption to the use of these routes which provide access to a wider network of PRow to the north and south. This is due to construction of the Waterbeach pipeline to the east of Waterbeach and under the railway line, the A14, Horningsea Road and the River Cam. - Would there be any effect on users accessing these PRow from the west, whether from other PRow or from the public highway?</i></p>
7.21	Applicant	<p>Public rights of way – severance during construction</p> <p>On page vi of ES Chapter 11 [AS-028] it is stated that <i>The public right of way (PRow) 85/6 along the east bank of the River Cam would be temporarily diverted for a period of up to 4 months for approximately 770m around the land temporarily required for construction of the outfall. It is assessed that there would be a temporary neutral effect on the users of [sic]</i></p> <p>The following is then set out in the same Chapter: 4.2.30 <i>Footpath 85/6 (parallel to the east bank of the River Cam south of the A14 road bridge) will be temporarily closed for a period of up to 6 months during construction of the outfall structure and the treated effluent pipeline. A temporary diversion will be put in place, via PRow 85/8 (which provides a connection between PRow 85/6 and PRow 130/1), throughout the construction period. and that 4.2.31 During the diversion there would be a period where use of the footpath 85/8 would cease due to the construction corridor related to the open cut construction of the treated effluent pipeline. This would require a longer diversion to the footway/cycleway along the western side of the carriageway to join the PRow 130/1 meaning users of the 85/6 would need to travel an additional 1010m to return to back to the 85/6.</i></p> <p>a) How long would the diversion last for – four or six months? b) How long would the closure of PRow 85/8 last for?</p>
7.22	Applicant	<p>Public rights of way – CoCP</p> <p>The CoCP Part A [APP-068] states:</p> <p>Public Rights of Way</p> <p>7.6.13 <i>The proposed construction works will impact a number of Public Rights of Way (PRow). Measures will be put in place to manage the impact upon users of the PRow during the construction period. 7.6.14 Where practical and feasible continued access to and use of the PRow will be facilitated in order to minimise the number of diversions required. Safety gates will be put in place and users allowed to safely cross the construction working area. 7.6.15 Where this is not feasible or would create a safety issue, the PRow will either be temporarily diverted or if the route cannot be diverted temporarily stopped up. Details of proposed diversions are shown on the Rights of Way Plans (App Doc Ref 4.6), referenced Part B of the CoCP and in DCO application (App Doc Ref 2.1).</i></p>

		<p>a) Please explain the measures referred to at para 7.6.13 or where details of these are set out in the application documentation;</p> <p>b) Would safety gates be operated by site personnel or PRow users? Would there be periods when PRow users would not be able to cross the construction working area via the gates? If so, how would these periods be communicated to PRow users, how long would such periods last for and could closures of crossing points be simultaneous (please provide information separately for each PRow)?</p> <p>c) Please indicate where the details referred to in para 7.6.15 can be found in CoCP Part B [AS-161].</p>
7.23	CCoC	<p>Public rights of way – management plans</p> <p>Is the CCoC satisfied with the proposed measures for the management of PRow during the construction phase? If not, please explain what measures you would like to see.</p> <p>Is CCoC satisfied with the proposed measures for the management of PRow during the operational phase as set out in the LERMP [AS-066]? If not, please explain what you would like to see.</p>
7.24	Applicant	<p>Site of proposed WWTP – proposed routes</p> <p>Design and Access Statement (DAS) para 6.12.1 [AS-168] states that: <i>A key objective of the Proposed Development is to expand and create recreational opportunities, employing new routes through the proposed WWTP site, adding a new bridleway, and linking to existing routes that expand the network of PRow. As the masterplan and LERMP developed, this strategy was integrated into the layout of routes and paths.</i> Whilst some parties have welcomed the proposed Bridleway (e.g. CCoC on page 84 of Applicant Regard to Section 42 Consultation Responses [APP-167]), a number of parties have raised issue with the proposed arrangements, for example:</p> <ul style="list-style-type: none"> • The RR of the British Horse Society [RR-036] says that the proposed PRow should be a Restricted Byway; that the permissive path across the application site should be a Restricted Byway; and that the proposed Horningsea Road crossing should be in a different location and designed for a wider variety of users. • SCDC's RR [RR-004] notes that that the extension to the B1047 does not include equestrian use and that it would be beneficial to include bridleway use as part of this circular route which would connect to new developments at Marleigh as well as Cambridge. It also says that the extent of the proposed new bridleway as part of the disused railway needs to be considered. • Stow-cum-Quy Parish Council's RR [RR-008] says that the plan to improve the proposed bridleway between the site and Quy is unclear and that there needs to be sufficient consideration given to prevent any unlawful vehicles using the bridleway, which is already a concern.

		<ul style="list-style-type: none"> • The NT RR [RR-031] says that the proposed bridleway does not connect well to Anglesey Abbey and does not provide a direct route. It suggests that this could create conflict as the most direct and obvious route to Anglesey Abbey is to continue along the dismantled railway (not shown on submitted plans) in a north easterly direction, but this is on private land. During pre-application discussions the National Trust requested that the Applicant explores the possibility of extending the new bridleway along the dismantled railway route to make this connection to Anglesey Abbey and is disappointed that this cannot be achieved. • NT also states, with reference to the Stow-Cum-Quy Fen SSSI, that an uplift in recreational use of the area could have negative implications on sensitive designated sites through increased disturbance, damage, contamination, etc and could also impact on the surrounding public rights of way. It says that the impacts of this application must be considered cumulatively with uplift in recreational use of the area associated with the proposed housing growth which would be delivered through the existing and emerging Local Plan, including the housing which would be enabled by the proposed development. <ol style="list-style-type: none"> a) What is the 'extension to the B1047' referred to by SCDC? b) Would the landowner agree to the proposed PRoW being a Restricted Byway? c) Why does the proposed PRoW not continue further along the dismantled railway towards Anglesey Abbey? d) Why are the permissive routes across the application site not being provided to Restricted Byway standard? e) Please explain the choice of crossing location on Horningsea Road, rather than it being located at the junction to Low Fen Drove. Could this be relocated to the junction of Low Fen Drove Way as suggested? f) Why is the creation of recreational opportunities a <i>key objective</i> of the Proposed Development? Is this necessary, and would the development be unacceptable without such facilities? g) Having seen the issues raised in the RRs (e.g. in relation to increased pressure on the SSSI) would it be preferable to omit any of the proposed PRoW or permissive routes – could any negatives outweigh any positives in the overall planning balance? h) Given that the route across the site and connecting with Low Fen Drove Way would be permissive, how would this be secured if development consent was granted? Would there be a minimum period of time that the Applicant would undertake to make it available for use / guarantee that it would not be closed? i) On page 84 of the DAS [AS-168] the 'Final Masterplan' drawing indicates a 'Pedestrian only – controlled access' route, illustrated with brown dots. How and when would access be controlled? j) On page 84 of the DAS [AS-168] the 'Final Masterplan' drawing indicates a 'Site Access Cycle Route' with orange dots. How would pedestrians and wheelchair users access the site?
7.25	Applicant, SCDC	Site of proposed WWTP – proposed routes

		<p>On page 51 of [APP-167] it is reported that SCDC raised concerns that users of the proposed walking routes might park in Horningsea village. At para 64 of its RR [RR-004], SCDC notes that the expansion of and improvements to existing and proposed new rights of way poses a potential risk of intensification of car-borne visitors to the area for the purpose of using these rights of way for recreation. It says that further consideration of the most appropriate means to manage this issue would, in the view of SCDC, be required to be addressed by conditions or other measures and that any such measures would also need to be kept under review.</p> <p>a) If the purpose of the walking routes, as implied by the Applicant on page 51, is not to increase usage / to provide greater choice to the existing community, is there any significant benefit to the creation of the proposed routes and the possible consequential impacts arising from the redistribution of car parking?</p> <p>b) How does the Applicant envisage that usage could change as a result of other major housing developments within the catchment area of the proposed walking routes?</p> <p>c) What evidence does the Applicant have to support its suggestion that there would not be a significant increase in usage?</p> <p>d) What evidence does SCDC have to suggest that there would be an increase in car parking pressure?</p>
7.26	Applicant	<p>Proposed routes – Pegasus crossing</p> <p>On page 126 of [APP-167] it is stated that: <i>The Proposed safety crossings on the Horningsea Road will utilise Pegasus Crossing status.</i> - Should Work No.1(c) of the dDCO [AS-139] be amended to add a reference to 'equestrian crossing'?</p>
7.27	Applicant	<p>Public rights of way – creation of a restricted byway</p> <p>At page 85 of [APP-167] it is noted that CCoC requested that the status of Horningsea Public Byway No. 17/Fen Ditton Byway No. 14 be changed from a Byway to a Restricted Byway by way of the proposed DCO or a Traffic Regulation Order. SCDC also supports this (page 50 of [APP-167]). Please explain whether or not this would be possible.</p>
7.28	Applicant	<p>Public rights of way – restoration</p> <p>Para 4.2.35 of ES Chapter 11 [AS-028] refers to: <i>...a requirement for all PRow to be restored to the same condition as before the works took place or to a standard which is acceptable to the Local Highway Authority which returns the paths to the same or better condition, so journey quality is unaffected once the works have been completed.</i> Please indicate where this Requirement can be found in the dDCO.</p>
7.29	Applicant, NE	<p>Mitigation measures – monitoring of recreational pressure</p> <p>On page 14 of ES Chapter 11 [AS-028] Natural England suggests surveys of PRow usage to inform the assessment of recreational pressure impacts. Whilst the Applicant refers to surveys undertaken to inform the application, new recreational routes are proposed as part of the application.</p> <p>Would it be preferable to undertake surveys / monitoring during the operational phase to identify any changes in behaviour and any proportionate mitigation? If so, how would the surveys and a means to subsequently agree mitigation be secured?</p>
7.30	Applicant	Impacts on businesses

		Figure 11.8 – Businesses [AS-046] does not illustrate any businesses in the vicinity of Poplar Hall Farm. However, RR [RR-239] refers to business activities as does the RR [RR-109]. Please confirm whether or not there are any businesses within the area bounded by the River Cam, Field Lane, Horningsea Road and the A14.
7.31	Applicant	<p>Impacts on business and residential properties – temporary access, Works 33 & 34</p> <p>Para 4.2.50 of ES Chapter 11 [AS-028] states: <i>The Proposed Development requires temporary and permanent land. CBS Automotive, located in Clayhithe, is the only business which is affected. Temporary and permanent land requirements do not require land from private residential property, or communities facilities, so are not considered further within this assessment.</i></p> <p>a) From the ExA's Unaccompanied Site Inspection, it appears that there might be another business immediately adjacent to CBS Automotive known as NE Joinery. This business is also listed in the Book of Reference. Would this business also be affected?</p> <p>b) There is a sign for 'Cambridge Car Audio' – is this a separate business from CBS Automotive?</p> <p>c) It also appears that a residential property shares the access with CBS Automotive (marked as 'Mulberry House' on the Land Plans [AS-151]). Please clarify. Would this access be affected?</p> <p>d) Please also confirm whether these parties have been directly consulted by the Applicant in respect of the Proposed Development.</p>
7.32	Applicant	<p>Changes to amenity</p> <p>Para 4.2.11 of ES Chapter 11 [AS-028] states that <i>Changes in amenity, which result from a combination of significant residual (post mitigation) effects reported in other assessment topics, specifically noise, vibration, odour, air quality and visual effects. For an amenity effect to be identified, at least two residual effects must combine at the same location. The assessment has not identified any residual significant effects combining at the same location. Therefore, no change to amenity is anticipated during the construction of the proposed WWTP. Therefore, the impact of change to amenity is not considered further within this aspect of the assessment.</i></p> <p>Whilst significant effects have not been identified, have other magnitudes of impact been identified? If so, please indicate the location and magnitude of the impact(s).</p>
7.33	Applicant	<p>Impacts on residential properties</p> <p>ES Chapter 11 [AS-028] states at para 4.2.10 that <i>These temporary and permanent land requirements are not required from community receptors, namely residential properties, community resources, non agricultural businesses or areas of formal open space and recreational parks. Therefore, the impact of temporary and permanent land requirement is not considered further within this aspect of the assessment.</i></p> <p>However, from [RR-128] it appears that the Proposed Development would use the sole vehicular access to Poplar Hall and Poplar Hall Farm.</p>

		<p>Whilst ES Chapter 11 indicates at para 2.9.6 that <i>Communities with a minimum of 30-50 properties have formed part of this assessment</i>, it is stated at para 2.9.5 that <i>Amenity is very important to communities and other stakeholders at local, district, regional and national level</i>. It appears that there may be individual properties which would not have been assessed at the community level but which could be adversely affected during the construction phase in terms of access and / or amenity.</p> <p>With reference to ES Figure 11.7 [AS-046] the ExA has identified the following properties for more detailed consideration:</p> <ul style="list-style-type: none"> • Poplar Hall (accessed from Horningsea Road to the south of the A14); • Poplar Hall Farm (accessed from Horningsea Road to the south of the A14); • Red House Close (the dwelling on the eastern side of the River Cam approximately 150m to the southwest of Poplar Hall Farm); • Northern Bridge Farm (the dwelling on the western side of the River Cam approximately 325m to the west of Poplar Hall Farm); • Mulberry House (the dwelling to the south of CBS automotive on Clayhithe Road); • 'The Hamlet' and 'The Mead' to the east of Clayhithe Road, approximately 100m to the west of Clayhithe Farm; • the properties accessed from Hartridge's Lane, approximately 500m to the northeast of Clayhithe Farm; • the properties close to Bottisham Lock which are accessed from Bannold Road to the east of Long Drove; • the property to the south-east of the junction of Burgess's Drove and Bannold Road; and • properties accessed from Long Drove (which runs perpendicular to Bannold Road). <p>Please provide a concise schedule explaining:</p> <ol style="list-style-type: none"> a) any temporary (including the duration) or permanent access changes to these properties as a result of the Proposed Development; b) any amenity impacts during the construction phase; and c) whether and how impacts could be mitigated.
7.34	Applicant	<p>Impacts on residential properties – decommissioning of the existing WWTP</p> <p>Para 4.2.65 of ES Chapter 11 [AS-028] states that <i>No community effects are anticipated in relation to construction activities within the existing Cambridge WWTP</i>. Para 4.4.1 of the same document states that: <i>No community effects associated with the decommissioning of the existing Cambridge WWTP are anticipated. The activities within the existing Cambridge WWTP would be temporary and do not require disturbance to community receptors, namely residential properties, community resources, non-agricultural businesses or areas of formal open space and recreational parks. Therefore, decommissioning is not considered further within this aspect of the assessment.</i></p>

		However, it appears from ES Figure 11.7 [AS-046] that there are residential properties immediately adjacent to the existing WWTP within the Order limits on Cowley Road. Please describe the likely effects of the Proposed Development on these properties, the duration of those effects, and whether any mitigation is needed.
7.35	Applicant, CCC, SCDC	<p>Employment RR [RR-175] states that <i>Anglian Water promote the benefit of a growth of 15,000 jobs at North East Cambridge should the relocation be permitted (AW 7.5). However, these employment growth targets have been identified as attainable at North East Cambridge by the Local Planning Authority in preparation for the existing Local Plan without a relocation of the Waste Water Treatment Works (SCDC CNFE 2014) and would not therefore be directly attributable to a relocation.</i></p> <p>What is your opinion on this comment and why?</p>
7.36	Applicant	<p>Employment and training opportunities for local people On page 15 of ES Chapter 11 [AS-028] SCDC raises a question about whether the Proposed Development could provide employment opportunities for all members of society, including under-represented groups. In its RR [RR-005], SCDC welcomes the aim to maximise benefits for local residents relating to employment, supply chain contracts as well as apprenticeships and training opportunities but says that it would expect areas of Suffolk to be included within this monitoring due to several communities being located within reasonable commuting distance to the Proposed Development, such as Newmarket.</p> <p>The Applicant says that more details around employment opportunities associated with the Proposed Development would be made available as construction planning develops. Would the Applicant be willing to enter into any formal commitment at this stage as to the inclusion of under-represented groups or people in need of training / apprenticeships / experience in the construction workforce? If so, please set out the nature of any such commitment.</p>
7.37	Applicant	<p>Environmental Statement – existing WWTP On page 9 of ES Chapter 11 [AS-028], it is reported that SCDC and CCC suggested that the following two scenarios must be ‘scoped in’ for the community aspect of the EIA:</p> <ul style="list-style-type: none"> • the potential impacts of the existing site being decommissioned (as currently proposed) but not redeveloped; and • the potential impacts of construction lasting longer than anticipated. <p>The Applicant’s response focusses on there being a separate planning application and associated environmental impact assessment for the existing WWTP and does not respond directly to these points. The ExA also notes that the prospect of a separate planning application does not guarantee that a redevelopment scheme would be approved or implemented. Please provide a response to the two points raised by SCDC and CCC.</p>
7.38	CCC, SCDC	<p>Community Liaison Plan Is the Community Liaison Plan [AS-132] sufficiently comprehensive? If not please describe any additional measures you would wish to be included.</p>

7.39	CCC, SCDC, CCoC	Equalities Impact Assessment (EqIA) Does the EqIA [APP-211] provide an appropriate level of detail for effects on equalities groups to be taken into account as part of the decision-making process in accordance with NPSWW and the PSSED?
8. Compulsory Acquisition (CA) and Temporary Possession (TP)		
Book of Reference (BoR), Statement of Reasons (SoR), Land Plans, diligent enquiry and updates		
8.1	Applicant	Please advise whether the BoR [AS-145] is fully compliant with the Department of Communities and Local Government guidance 'Planning Act 2008: procedures for the compulsory acquisition of land' (September 2013) (DCLG guidance).
8.2	Applicant	a) Notwithstanding Appendix 5 of the SoR [AS-143], please provide further detail / justification of how you have identified Category 3 parties for the purposes of the BoR [AS-145]. b) Are there any other persons who might be entitled to make a relevant claim if the DCO were to be made and fully implemented and should therefore be added as Category 3 parties to the BoR [AS-145]? This could include, but not be limited to, those that have provided representations on, or have interests in: <ul style="list-style-type: none"> - noise, vibration, smell, fumes, smoke or artificial lighting; - the effect of construction or operation of the Proposed Development on property values or rental incomes; - concerns about subsidence or settlement; - claims that someone would need to be temporarily or permanently relocated; - impacts on a business; - loss of rights, e.g. to a parking space or access to a private property; - concerns about project financing; - claims that there are viable alternatives; or - blight.
8.3	Applicant	The Land Plans [AS-151] indicate which plots would be subject to TP only. However, does the Applicant intend for all plots to be subject to TP and if so, where is this provided for in the dDCO and within the SoR / BoR?
8.4	Affected Persons, IPs	Are any Affected Persons or Interested Parties aware of any inaccuracies in the BoR [AS-145], SoR [AS-143] or on the Land Plans [AS-151]? If so, please set out what these are and provide the correct details.
8.5	Applicant	Please summarise where you have not yet been able to identify any persons having an interest in the land, including any rights over unregistered land. What further steps will you be taking to identify any unknown rights during the Examination?
8.6	Applicant	Please provide further detail as to how diligent enquiry has been carried out, noting that there are a numerous 'unknown' interests in Part 1 and Part 3 the BoR [AS-145] (e.g. Plot 001a amongst many others) and numerous entries such as 'The Owner', 'The Occupier', or 'The Leaseholder' in Part 2 of the BoR?
8.7	Applicant	Please ensure that the BoR [AS-145], SoR [AS-143] and Land Plans [AS-151] are: a) Kept fully up to date with any changes and the latest versions submitted at the deadlines shown in the Examination timetable together with an explanation of the reasons for each change;

		b) Supplied in two versions (clean and track changed) at each deadline; c) Supplied with unique revision numbers that are updated consecutively from the application versions, clearly indicated within the body of each document and included within the electronic filename; and d) The dDCO [AS-139], including relevant Schedules, is updated accordingly.
8.8	Applicant	What assurance and evidence can the Applicant provide of the accuracy of the land interests identified as submitted and can the Applicant indicate whether there are likely to be any changes to the land interests, including the identification of further owners / interests or monitoring and update of changes in interests?
8.9	Applicant	Do you envisage any further proposed changes to the application, including any which might engage The Infrastructure Planning (Compulsory Acquisition) Regulations 2010?
8.10	Applicant	Please provide detailed information on the status of negotiations with all Affected Persons given that the ExA should be satisfied that the Applicant has engaged with all Affected Persons with a view to acquiring their land interests by agreement. This information can be included in the Compulsory Acquisition Schedule and Statutory Undertakers Progress Schedule (see below).
How is it intended to use the land, whether reasonable alternatives have been explored and whether the rights sought are legitimate, proportionate and necessary		
8.11	Applicant	To assist with the consideration of whether the extent of the land to be used temporarily is no more than is reasonably required for the purposes of the Proposed Development, please provide further details to justify the extent of the land sought to be used temporarily.
8.12	Applicant	Article 35(9) (a) and (b) of the dDCO [AS-139] appear to provide for the CA of rights over land / CA of subsoil in respect of plots identified for TP only (as set out in Schedule 12 of [AS-139] and as identified on the Land Plans [AS-151] in green). Please justify such powers, clarify to what extent persons affected are likely to be aware of this and confirm whether the powers sought are reflected in the BoR [AS-145] and SoR [AS-143]?
8.13	Applicant	Section 7.2 (amongst other sections) of the SoR [AS-143] states that there is a compelling case in the public interest for CA. Please address the following: a) What assessment, if any, has been made of the effect upon individual Affected Persons and their private loss that would result from the exercise of CA powers in each case; b) How has it been demonstrated within the application that the public benefits of the scheme would outweigh any residual adverse effects including private loss suffered by individual landowners and occupiers; and c) Demonstrate how such a conclusion has been reached and how the balancing exercise between public benefit and private loss has been carried out?
8.14	Applicant	Section 7.7 of the SoR [AS-143] addresses human rights. a) Please provide a more detailed demonstration that interference with human rights in this case would be proportionate and justified; and b) Explain how the proportionality test has been undertaken and how this approach has been undertaken in relation to individual plots?

8.15	Applicant	For the avoidance of doubt, please set out all the factors that are regarded as constituting evidence for a compelling case in the public interest for the CA and TP powers sought and where, giving specific paragraph references, are these set out in the submitted documentation?
8.16	Applicant	Please clarify why it is proposed to first connect the Waterbeach pipeline to the existing WWTP before diversion to the proposed WWTP, rather than just connecting to the proposed WWTP in the first place. How would this arrangement satisfy the conditions under s122 of PA2008?
8.17	Applicant	There is currently no statutory requirement for BNG for projects considered under PA2008. The application indicates that 20% BNG would be provided and this is reflected in R11 of the dDCO [AS-139]. a) What is the amount of land required and subject to CA / TP to provide the 20% BNG; and b) If this is not a statutory requirement, how would it satisfy the conditions under s122 of PA2008 (noting that some RRs mention this also (e.g. [RR-028 and RR-192]))?
Individual objections, issues and agreements		
8.18	Affected Persons	Does any Affected Person have any concerns that they have not yet raised about the legitimacy, proportionality or necessity of the compulsory acquisition or temporary possession powers sought by the Applicant that would affect their land or their rights in land?
8.19	Applicant	Please complete the Compulsory Acquisition (CA) / Temporary Possession (TP) Objections Schedule (CA Schedule) (at Annex A of this document) and make any entries you believe would be appropriate, taking account of the positions expressed in RRs, and giving reasons for any additions. As the Examination progresses and at each successive deadline, please update the CA Schedule as necessary.
	Applicant	In the light of the DCLG guidance, in particular para 8, please describe: a) How the ExA can be assured that all reasonable alternatives to CA (including modifications to the scheme) have been explored; and b) Set out in summary form, with document references where appropriate, what assessment / comparison has been made of the alternatives to the proposed acquisition of land or interests in each case.
Statutory undertakers		
8.20	Applicant Cadent Gas Limited, Network Rail Infrastructure Limited, National Highways, CCoC, Conservators of the River Cam	The BoR [AS-145] includes several Statutory Undertakers with interests in land and equipment that would be affected by CA / TP. The Applicant: a) Provide a progress report on negotiations with each of the Statutory Undertakers listed in the BoR, with an estimate of the timescale for securing agreement with them; b) Indicate whether there are any envisaged impediments to the securing of such agreements; and c) State whether any additional Statutory Undertakers have been identified since the submission of the BoR with the application.

		<p>To Statutory Undertakers (and others subject to protective provisions):</p> <p>Where Statutory Undertakers (and others subject to protective provisions) have concerns regarding the current drafting of the Protective Provisions within the dDCO [AS-139], either provide copies of preferred wording or if you have provided it, signpost where it can be found and explain why you do not consider the wording as currently drafted to be appropriate.</p>
8.21	Applicant	<p>The Applicant is requested to review the RRs and subsequent Written Representations made by any Statutory Undertaker as the Examination progresses and at each successive deadline update, as necessary, a table identifying and responding to any representations made by Statutory Undertakers with land or rights to which s127 and / or s138 of PA2008 applies (Statutory Undertakers Progress Schedule – which could form part of the CA Schedule). Where such representations are identified, the Applicant is requested to identify:</p> <ol style="list-style-type: none"> An up-to-date list of Statutory Undertakers; The nature of their undertakings; The Statutory Undertaker's land, rights or apparatus that would be affected and how it would be affected; The progress made in discussions with Statutory Undertakers since the last update in relation to the tests set out in s127(3)(a) or (b), s127(6)(a) or (b) and s138(4) of PA2008 and why these apply; and Any agreement or differences between the Applicant and the Statutory Undertaker about whether the tests have been met, the next steps to be taken, and the progress anticipated by the close of the Examination; In relation to these matters, whether any protective provisions and / or commercial agreement are anticipated, and if so: <ul style="list-style-type: none"> whether these are already available to the ExA in draft or final form; whether a new document describing them is attached to the response to this question or whether further work is required before they can be documented; and In relation to a Statutory Undertaker named in an earlier version of the table but in respect of which a settlement has been reached: <ul style="list-style-type: none"> whether the settlement has resulted in their representation(s) being withdrawn in whole or part; and identifying any documents providing evidence or agreement and withdrawal. <p>The above information will be published on the project page of the National Infrastructure website, so commercial and / or confidential details should not be given.</p>
Special category land		
8.22	Applicant	<p>The SoR [AS-143] and BoR [AS-145] state that there is no land categorised as 'special category land' (i.e. common, open space or fuel or field garden allotment land). However, ES Chapter 11 [AS-028] makes numerous references to 'open space', including in respect of the River Cam and public rights of way. Please provide clarification on whether any of the Order land includes open space for the purposes of s131 and s132 of PA2008.</p>

8.23	Applicant	Plan [AS-152] is titled 'Special Category and Crown Land Plan'. However, the BoR indicates there is no land classified as special category land. Please clarify and amend as necessary (noting also the above question on the matter).
Crown land		
8.24	Applicant	<p>Consent is required for any provision in the DCO which would relate to Crown land or rights benefiting the Crown in accordance with s135(1) and s135(2) of PA2008. Among other things this includes consent for any TP sought over Crown land. Part 4 of the BoR [AS-145] identifies no Order land under Crown ownership (which is confirmed in the SoR) but lists numerous plots in which the Crown holds an interest in the land. Elsewhere, the description of these plots includes the tailpiece 'except those interests belonging to the Crown'.</p> <p>a) Please provide a further explanation for the inclusion of this wording and what it implies for the purposes of s135 of PA2008;</p> <p>b) The SoR [AS-143] advises that you are in discussions with the appropriate Crown authorities (SoS for Transport and SoS for Defence) in order to obtain their consent to the inclusion of these provisions as required under s135 of PA2008. Please provide an update on where these discussions are and confirm whether agreement will be reached before the close of the Examination; and</p> <p>c) Please confirm whether any land subject to escheat is included within the Order limits?</p>
Compensation provisions and adequacy of funds		
8.25	Applicant	Since the production of the Funding Statement [APP-013], have there been any changes / cost implications which necessitate for it to be updated as a result (i.e. para 3.1.9 relates to inflation and market condition tracking and para 3.1.10 relates to a commitment to work together to secure additional funding)?
8.26	Applicant	If the project costs increase, how would the additional funding be secured?
8.27	Applicant	<p>Funding Statement para 3.1.3 [APP-013] indicates that funding for elements of the Proposed Development would be through the 'Final Determination' of an 'Asset Management Period'.</p> <p>a) Is the relevant funding secured through the 2020-2025 period or a future period;</p> <p>b) If a future period, how certain can the Applicant (and the ExA) be that such funding would be approved / secured; and</p> <p>c) If a future period, what implications would this have for the delivery of the Proposed Development and timescales for the ability to pay compensation?</p>
8.28	Applicant	Has the Funding Statement [APP-013] taken into account all potential project costs, including biodiversity offsetting (notably river units) and potential carbon offsetting costs (as mentioned in para 6.1.19 of ES Chapter 8 [AS-026] and para 5.1.4 of ES Chapter 10 [APP-042] respectively)?
8.29	Applicant	<p>Funding Statement para 4.1.5 [APP-013] identifies total costs for compensation / CA / TP to be in the region of £5 million.</p> <p>a) Please provide a breakdown of this figure, noting that it has been arrived at through professional advice from a chartered surveyor (para 4.1.4).</p> <p>b) Please clarify if this figure includes the £1.2 million for potential blight claims; and</p>

		c) Please confirm whether any blight notices have been received?
8.30	Applicant	Is the construction of the proposed Waterbeach pipeline element included within the £22.5 million referred to in Funding Statement para 3.1.7 [APP-013]? If not, what would be the cost of this element and how would it be funded?
8.31	Applicant, Homes England	<p>Planning Statement para 1.7.6 [AS-166] states that the HIF places obligations on the Applicant to relocate and commission the proposed WWTP and decommission the existing WWTP by March 2028, with works (as shown on Figure 1.1) set to commence in the second quarter of 2024 (albeit the application for the s35 Direction suggested commencement in early 2024 to meet the March deadline (page 137 of the Planning Statement)).</p> <p>a) How can the ExA be certain that this timescale is achievable (including having regard to SoS decision dates, approval of permits, discharging of pre-commencement requirements etc.);</p> <p>b) Are there any potential unforeseen issues which might arise which may have implications for this timescale; and</p> <p>c) Should the timescales not be met, what implications would this have for the HIF?</p>
8.32	Applicant	Other made DCOs have included a requirement to ensure that funding for CA / TP and other compensation would be in place prior to the exercise of the relevant powers (see, for example, Article 45 of the Hornsea Four Offshore Wind Farm Order 2023 and Article 31 of the Awel y Môr Offshore Wind Farm Order 2023). Given the complexities of funding in the case of this project and the different funding sources for various elements of it, would the Applicant be willing to include a similar requirement in the dDCO for this project?
Site specific issues		
8.33	Applicant	<p>Having regard to RRs [RR-028, RR-109, RR-245 and RR-239], please clarify:</p> <p>a) the extent of the use of access through Poplar Hall Farm (including Plots 012a and 012i) during the construction and operational phases of the Proposed Development;</p> <p>b) to what extent access to neighbours and services would be affected;</p> <p>c) to what extent any farming / business operations would be affected; and</p> <p>d) the need for the permanent acquisition of Plots 012b, 012r and 012s.</p>
8.34	Applicant	The Parochial Church Council of the Ecclesiastical Parish of Horningsea [RR-038] raises concerns around Chancel Repair Liability and funding effects as a result of CA. Please clarify to what extent its Chancel Repair Liability interests in respect of the relevant plots would be affected?
8.35	Applicant	There are some substantial areas subject to proposed CA freehold acquisition (shown pink on the Land Plans) in addition to the main proposed WWTP site, including strips along the proposed transfer tunnel route and rising main, the proposed bridleway and an area around the proposed new outfall location. Please provide further justification for the proportionality of such CA.
8.36	Applicant	Plot 019a (freehold acquisition) extends some distance over the River Cam. Please justify the extent and indicate how freehold acquisition may affect any users of the River Cam and access to this part of the river.
Other		
8.37	Applicant	Are any land or rights acquisitions required in addition to those sought through the dDCO before the Proposed Development could become operational?

8.38	Applicant	Please clarify: a) how you have had regard to the Equality Act 2010 in relation to the powers sought; b) whether any Affected Persons have been identified as having protected characteristics; and c) if so, what regard has been given to them.
8.39	Applicant	Please clarify why Waterbeach Parish Council are listed in the BoR Part 2 (Category 3) multiple times.
8.40	Applicant	Please clarify, having regard to [RR-033, RR-042, RR-057, RR-128 and RR-213], whether any changes to the BoR [AS-145] are required.
9. Design		
9.1	Applicant	Design principles and objectives The DAS [AS-168] includes a set of Design Objectives and a set of Design Principles. a) Explain the reasons for only referring to the Design Objectives in R7 of the dDCO [AS-139]; b) Clarify whether, by not referring to the Design Principles in R7 of the dDCO (which make reference to a design panel and design review process), the Applicant does not intend to use a design review panel to assist with determining the final design of the Proposed Development; c) Confirm whether the Applicant would be willing to include reference to the Design Principles in R7 of the dDCO and further to specify that the final design would be subject to review by a Design Review Panel, noting that this is encouraged in NPSWW para 3.5.2; and d) If so, please specify which bodies would be represented on the Design Review Panel and their specialisms (e.g. design, landscape architecture, ecology etc..).
9.2	CCC, SCDC, IPs	Design review Please comment on the desirability of implementing a Design Review Panel to provide an informed 'critical friend' on the developing proposals, to ensure that good quality sustainable design and integration of the Proposed Development into the landscape is achieved in the detailed design, construction and operation of the project.
9.3	Applicant	Design characteristics Noting for example SCDC's RR [RR-004], how would the proposed rotunda / hill fort inspired design reflect the landscape and historic character of the area and where are the nearest historic features of this type (or remnants of such) (i.e the local hillforts of the fens and Belsar's Hill as mentioned in the DAS [AS-168])?
9.4	Applicant	Design champion Do you have a design champion within your organisation designated to the project? If so, what are their qualifications for such a role and what is their hierarchical position within the project?
9.5	CCC, SCDC	Detailed design Are you satisfied that you have sufficient design expertise to ensure good design of the Proposed Development (including the proposed WWTP, bunding and landscaping) in respect of discharging R7 of the dDCO [AS-139], were development consent to be granted?
9.6	Applicant	Requirements

		R7(2) of the dDCO allows for an explanation as to why it may not be reasonably practicable to accord with the Design Objectives of the DAS. a) Under what circumstances might this occur; and, b) If it were to occur, could this have implications for the delivery of good design?
9.7	Applicant	Policy NPSWW para 3.5.1-2 sets out that good design is about ensuring attractive, usable, durable and adaptable places and contributing to sustainable development. Para 3.5.3 sets out that the development should, by the use of good architecture and appropriate landscaping, be as visually attractive as possible and that siting of the development and the sensitive use of materials are important aspects of design. Para 3.5.4 requires applicants to set out the main alternatives to the design they have considered and reasons why the favoured choice was selected. Please provide a detailed response as to how the Proposed Development would: a) Achieve good design having regard to NPSWW para 3.5.1 to 3.5.4; b) Accord with the National Infrastructure Commission's Design Principles for National Infrastructure (February 2020); and c) Accord with any adopted development plan policies relating to design.
9.8	Applicant	Design constraints Please clarify how the presence of a chalk aquifer has influenced the design of the proposed WWTP and what constraints this has posed for the potential to reduce the heights of structures / sink them deeper into the ground (noting, for example, that the terminal pumping station would be sunk relatively deep compared with, say, the digestors, as shown on [APP-023])?
9.9	Applicant	Design plans For clarity, please annotate the boiler stack on the Design Plans - Site Plan [APP-023] (referred to as 'boiler stack' in dDCO and 'boiler chimney' in Design Plans cross sections [APP-023]).
9.10	Applicant	Design and Access Statement The DAS para 2.2.2 [AS-168] sets out three bullet points for design improvements over the existing WWTP – how would these be secured?
9.11	Applicant	Parking The DAS at para 2.11.2 [AS-168] states that photovoltaics may be installed over car parking within the earth bank. Where within the earth bank would car parking be located and where is this shown?
9.12	Applicant	Requirements Does R7 of the dDCO relate to all aspects of the Proposed Development, including, for example, the Proposed Outfall to the River Cam, as well as the main proposed WWTP?
10. Draft Development Consent Order (dDCO)		
Note: Questions / comments relate to dDCO [AS-139] (clean) and [AS-140] (tracked)		

General		
10.1	Applicant	Please amend the three relevant para on pages 4 and 5 to identify that the ExA is a panel / panel of three.
10.2	Applicant	The dDCO refers to some plans as being in outline (e.g. outline soil management plan), whilst others are not referred to in this way (e.g. construction traffic management plan (CTMP)), albeit detailed versions would be required to be submitted for approval. Please clarify the reason for this noting that this has the potential to cause some confusion.
10.3	Applicant, CCC, SCDC	The ExA understands that R17 relates to the decommissioning of the existing WWTP as per the definition in Sch 2, Part 1 of the dDCO [AS-139]. a) Should there be a requirement for, and which also details appropriate information for, the eventual decommissioning of the proposed WWTP; and b) If not, would this mean that it would remain on the site for an infinite period?
10.4	Applicant	Please explain how the dDCO would deliver closure, decommissioning, rescinding of operational consents, and transfer of the land to facilitate the development of the existing WWTP site.
Questions / comments relating to Articles (A)		
10.5	Applicant	A2 - The definition of 'commence' means to carry out a material operation – s155 of PA2008 defines this as any operation except one of a prescribed description. There are no prescribed descriptions in the term. However, R3 (phasing) and R15 (drainage) would seem to allow the enabling phase to commence prior to certain details being submitted and approved. a) How does this align with the definition of 'commence'; and b) Please clarify whether any works at all would occur prior to, for example, the discharge of R9 (CEMP) or R13 (AIMS), which are pre-commencement requirements?
10.6	Applicant	A10, A11, A13, A14 and A15 - CCoC's RR [RR-001] requests some amendments to these articles – please address and update them accordingly.
10.7	Applicant	Article 19 (1) – should this be made subject to para (3) and (4)?
10.8	Applicant	A30 – this article relates to subsoil more than 7 metres beneath the surface (with the relevant plots listed in Sch 11). Please explain the reason for this land being shown as pink (freehold acquisition) on the Land Plans [AS-151].
10.9	Applicant	A35(9)(a) and (b) appear to provide for the CA of rights over land / CA of subsoil in respect of land identified for TP only (as set out in Sch 12). Please justify such powers and clarify to what extent persons affected are likely to be aware of this?
10.10	Applicant	A44(b) – Please further justify this power and explain any potential consequences for navigation / river users given the extent to which Work No. 32 extends over the River Cam?
10.11	Applicant	A44 – given this article relates to rights, please explain why it is within Part 6 rather than Part 5 of the dDCO?
Questions / comments relating to Requirements (R)		

10.12	Applicant, CCC, SCDC	Where requirements are to be discharged by <i>the relevant planning authority</i> , please clarify how this would occur efficiently and with the whole project bearing in mind there may be some crossover between CCC and SCDC? Would there be a need for these authorities to work together to discharge requirements and if so, is this reflected in the dDCO [AS-139]?
10.13	Applicant	Is R7 of the dDCO sufficiently detailed or should it, for example, include provision for further landscape detail, such as sizes, species, hard and soft details etc.?
10.14		R8 and R9 – Please explain: a) the relationship between the CoCP and the Construction Environmental Management Plan; and b) whether the CoCP is in outline and if so, whether a detailed version is required.
10.15	Applicant	R9(2)(a) – Please clarify what is included in the enabling phase and the reasons this is separated out from other phases?
10.16	Applicant	R10 – should the construction outfall management and monitoring plan (R10(1)) and the operational outfall management plan (R10(4)) make provision for consultation with any other bodies, such as the Environment Agency, Natural England and the Conservators of the River Cam (noting NE's RR [RR-015])?
10.17	Applicant	R11 – should this requirement make provision for consultation with any other bodies, such as the Environment Agency and Natural England (noting NE's RR [RR-015])?
10.18	Applicant	R13 relates to an archaeological investigation mitigation strategy (AIMS). Should it refer to being in accordance with measures set out in the CoCP (as, for example, R9 does) as well as the outline AIMS?
10.19	Applicant	R16 – Natural England [RR-015] suggests that this requirement should make provision for reporting, investigation and remediation of water contamination in addition to land-based contamination. Please address this and amend the dDCO as necessary.
10.20	Applicant, SCDC, CCC, CCoC	R17 states that decommissioning must be started no later than 3 months following the completion of commissioning, or longer if agreed by the relevant planning authority. Should this requirement also specify the maximum duration which decommissioning works should take?
10.21	Applicant	R20(3) – should this be in accordance with the <i>approved detailed</i> odour management plan?
10.22	Applicant	R21(1) – should this be <i>approved</i> in writing rather than 'agreed' in writing?
10.23	Applicant	R21(4) – should this be in accordance with the <i>approved detailed</i> carbon management plan?
10.24	Applicant	R22 – please provide the outline operational water quality management plan.
Questions / comments relating to Schedules (Sch)		
10.25	Applicant	Sch 2, Part 1 - The enabling works as defined refer to paragraph 3.1.8 of ES Chapter 2 [APP-034]. However, it appears that the correct paragraph is 3.1.6. In addition, paragraph 3.1.7 of ES Chapter 2 also specifies further enabling works which do not appear to have been mentioned in the Sch 2, Part 1. Please clarify.
10.26	CCC, SCDC	Sch 2, Part 2, 1(2)(a) and (b) – please confirm whether you are content with the specified 42-day time period for discharging requirements?

10.27	The Applicant IPs	Sch 2, Part 2, 1 - should this make some provisions, such as time periods, for the relevant local planning authority to consult any specified consultees?
10.28	Applicant	Sch 3 is titled 'Streets subject to street works' but the table includes a number of public rights of way in addition to streets – please explain the reasons for this?
10.29	Applicant	Sch 3 and Sch 4 - CCoC's RR [RR-001] requests these schedules differentiate between public highways and others. Please address and update the schedules as necessary.
10.30	Applicant	Sch 14 – throughout this schedule it is specified that finished ground level would be + or – 0.5m either side of the maximum parameter (which, for example, would be 9.5m above ordnance datum (AOD) for the terminal pumping station). On this basis, it would seem that a maximum parameter for the terminal pumping station would be 10.0m AOD. If so, would it provide greater clarity to present the information in this way?
10.31	Applicant	Schedule 14 (Parameters) - [RR-061] refers to inconsistencies between some submission documents and this schedule, for example the limits of deviation shown in Design Plan document [APP-024]. Please address this.
10.32	Applicant	Sch 15 (protective provisions) - Planning Inspectorate Advice Note 15 states that <i>If Protective Provisions for more than one protected party are included in a single Schedule, SI drafting requires the numbering of the para to follow sequentially throughout the Schedule and not re-start at '1' with each part (as with all textual Schedules in several parts). This approach should be adopted in the dDCO submitted with the application and in each amended draft submitted during the Examination where Protective Provisions are changed.</i> Please amend Sch 15 to align with good practice.
10.33	Applicant	Schedule 15 Part 6 - CCoC's RR [RR-001] refers to protective provisions for its benefit as Local Highway Authority and requests these are amended to address compensation, timescales for certification and PRoW. Please address this and amend the protective provisions as necessary.
10.34	Applicant	Sch 17(3) - This appears to seek to disapply building regulations for all buildings. However, [AS-123] suggests building regulations would be applied for in respect of the Gateway Building. Please clarify.
10.35	Applicant	Sch 17(5) - This appears to seek to disapply the Community Infrastructure Levy Regulations in respect of all buildings by deeming them ones in which people do not normally go or go in only to fix plant or machinery. Would this include the Gateway Building, and if so, please justify this power in respect of it.
10.36	Applicant	Sch 19 – please keep this up to date at each deadline having regard to any revised documents submitted during the Examination.
Explanatory Memorandum (EM)		
10.37	Applicant	Please update the EM as necessary.
11. Green Belt		
11.1	Applicant	Proposed Development

		Please set out in a table which elements of the Proposed Development the Applicant considers would be inappropriate development and which elements would not be inappropriate development in the Green Belt (noting, for example, that the Planning Statement [AS-166] and Green Belt Assessment [APP-207] do not appear to mention the Gateway Building / visitor centre in this regard).
11.2	Applicant	Effects How has the Applicant sought to minimise the amount of inappropriate development in the Green Belt and to minimise its visual impact?
11.3	Applicant	Quantum of development How would the size and volume of the proposed WWTP compare with the size and volume of the existing WWTP?
11.4	Applicant	Discovery centre and parking Please explain the need for the Discovery Centre and any other non-operational facilities being located in the Green Belt and justify the amount of proposed car parking.
11.5	Applicant	Assessment The Green Belt Assessment at para 6.1.6 [APP-207] identifies and overall level of 'moderate' harm to the openness of the Green Belt and to purposes of the Green Belt. As with other assessments which form part of the application, is this to be considered as a significant effect?
11.6	Applicant, CCoC, CCC, SCDC	Existing WWTP The ExA notes that the remediation of the existing WWTP site and its redevelopment for housing are not secured through the dDCO and that the site is not formally allocated for such a purpose in the relevant development plan. On this basis, what weight should the ExA afford to its potential for any redevelopment and housing delivery as contributing to the very special circumstances needed to outweigh the harm to the Green Belt, and any other harm, by reason of the inappropriateness of the Proposed Development?
11.7	Applicant	Benefits The Planning Statement at para 6.2.13 [AS-166] lists a number of reported benefits associated with the Proposed Development. To what degree could these be achieved if the WWTP were to remain at its current site?
11.8	Applicant	Benefits How much energy would be produced by the Proposed Development to feed into the grid?
11.9	Applicant	Assessment Some RRs (e.g. [RR-167]) make reference to the Applicant's Green Belt Assessment [APP-207] and its consistency with the Greater Cambridge Green Belt Assessment. Please provide a response to this.
11.10	Applicant	Discovery Centre Please clarify the demand for the Discovery Centre and provide examples of where such facilities have been successful and well used over a sustained period of time on other infrastructure projects.
12. Health		
12.1	Applicant	Policy – NPSWW

		<p>NPSWW states at para 3.10.1 that <i>Adequate provision of waste water infrastructure is clearly beneficial to society and to our health as a whole.</i></p> <p>a) Is the existing WWTP adequate for existing and foreseeable future needs?</p> <p>b) If not, why not – and is it capable of being made adequate? What would need to be done to make it adequate?</p> <p>c) With regard to NPSWW para 3.10.2 and 3.10.3, please set out your opinion as to whether the health impacts would be lower, about the same, or greater if in the future waste water was treated at the existing WWTP site rather than the proposed WWTP site in particular in relation to:</p> <ul style="list-style-type: none"> • traffic; • air pollution; • noise; • access to key public services (including Fen Ditton Primary School); • employment; and • use of open space and water for recreation and physical activity. <p>If you consider it would assist in the assessment of the overall planning balance, please also add your opinion in relation to any other health impacts which are not enumerated in these paras of NPSWW but which you have identified in your ES, for example ‘crime and public safety’ (para 3.3.14 of Chapter 12 [APP-044]).</p>
12.2	CCC	<p>Policy – local plan</p> <p>Has the Applicant identified the correct 2018 Cambridge Local Plan policies at 1.3.4 of ES Chapter 12: Health [APP-044] for the purposes of assessing impacts on health? If not, which policies should be taken into account?</p>
12.3	SCDC	<p>Policy – local plan and SCDC SPD</p> <p>a) Is the ‘South Cambridgeshire District Council Local Development Framework, Health Impact Assessment, Supplementary Planning Document (Adopted March 2011)’ referred to at 1.3.4 of ES Chapter 12 [APP-044] still in force?</p> <p>b) If yes, which 2018 Local Plan policy does this relate to?</p> <p>c) If yes, please provide a copy.</p> <p>d) Is the Applicant’s HIA sufficiently comprehensive to address current policy?</p> <p>e) Has the Applicant identified and assessed the application against the correct 2018 Local Plan policies?</p>
12.4	CCoC	<p>Mental Wellbeing Impact Assessment</p> <p>In your RR [RR-001] you state <i>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.</i> Does Revision 02, September 2023 [AS-077] addressed your concerns?</p>
12.5	Applicant	<p>Mental Wellbeing Impact Assessment</p> <p>In its RR [RR-002] CCC states 42. <i>In respect of the mental health and wellbeing assessment, the City Council is satisfied that baseline measurements have been taken (page 13) however it is noted that there is no specific</i></p>

		<i>reference in chapter 5.2 as to how mitigation would be secured, nor when further assessments would be undertaken to monitor change have been included. The City Council considers this information needs to be provided by the applicant. Please provide the requested information.</i>
12.6	Applicant	<p>Equality - Gypsies, Roma, Travellers</p> <p><i>In its RR [RR-004] and in respect of Health, SCDC states: 66. The District Council notes that although the Gypsy, Roma, Traveller population have been scoped in as part of the assessment but, it is unclear from the stakeholder engagement if any proactive engagement was undertaken with this community. It is acknowledged that numerous stakeholders were approached with regards to the application, however little feedback was received in response. The District Council will therefore ask the ExA to require clarity on what if any further attempts were made to ensure input was received from as wide a range of stakeholders as possible.</i></p> <p><i>In its RR [RR-001] and in respect of Health, CCoC states 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.</i></p> <p>Please respond to the authorities' comments and explain, with justification, whether or not you consider it necessary to undertake further consultation with these groups to ensure compliance with equalities duties.</p>
12.7	Applicant	<p>Existing WWTP – pests</p> <p>How would any impacts from pests be minimised and mitigated during decommissioning and after the existing WWTP site has been decommissioned, pending any redevelopment?</p>
12.8	Applicant	<p>Existing WWTP – decommissioning phase impacts</p> <p><i>In its RR (para 6.6-6.8) [RR-001] CCoC raises concerns around a range of matters relating to health impacts, including: decommissioning process details and timelines; decontamination responsibility; community safety; potential leachates from tank holes; temporary odour control / scrubbers; and fugitive emissions from cleaning processes. In addition CCC's RR [RR-002] raises concerns around decommissioning phase duration details and mitigation and potential for anti-social behaviour following decommissioning and prior to any redevelopment.</i></p> <p>Please respond to these comments and provide additional analysis as appropriate.</p>
12.9	Applicant	<p>Proposed ventilation stack at the existing WWTP</p> <p><i>In its RR [RR-001] CCoC states that 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.</i></p>

		<p>Please respond to this comment, in particular:</p> <ul style="list-style-type: none"> a) whether such an assessment should be undertaken in the absence of an adopted development plan allocation for residential development; b) in the event that a residential allocation is adopted, the extent of land that could have to be excluded from that allocation – please indicate this on a map and also indicate the location of this on the draft policies map covering the proposed NEC allocation; and c) if an assessment of the effects on future residential receptors should be undertaken, which potential effects would need to be explored.
12.10	Applicant	<p>Proposed WWTP – construction phase effects in Fen Ditton</p> <p>At para 4.2.32 of ES Chapter 12 [APP-044] it is stated that <i>In the community of Fen Ditton, additional traffic and congestion is likely to occur for a period of up to 24 months along Horningsea Road, the adjoining roads of High Ditch Road and Ditton Lane. In these locations construction noise and lighting may also be noticeable from some locations...</i></p> <p>The submitted Construction Traffic Management Plan (CTMP) [AS-109] does not describe the use of High Ditch Road and Ditton Lane as part of the construction routes, nor are they illustrated as construction routes on Figure 12.1 (PDF page 2 of 9) in ES Book of Figures Health [APP-059].</p> <p>Please explain why High Ditch Road and Ditton Lane would experience additional traffic and congestion during construction, and the expected type and volume of additional traffic.</p>
12.11	Applicant	<p>Proposed WWTP – education / Fen Ditton primary school</p> <p>In its RR [RR-001] CCoC states that <i>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.</i></p> <p>Please endeavour to agree with CCoC, by way of the proposed SoCG, a satisfactory position in relation to school access during the construction phase.</p>
12.12	Applicant	<p>Proposed WWTP – mental health impacts</p> <p>The ES has identified mental health effects during the operational phase e.g. in terms of employee mental health (para 2.2.14 of ES Chapter 12 [APP-044]) and <i>Changes to how local people feel about their community, in particular their sense of place and wellbeing, including mental health</i> (page 29 of the same document).</p>

		<p>A RR [RR-207] notes that <i>As a long term resident of Horningsea I am specifically concerned about the impact this plan is having on the mental health of so many residents. There is a feeling of despair. Many residents feel trapped – they feel they cannot cope with staying with the disruption that will ensue for many years, yet they cannot sell their houses. This is leading to an overwhelming depression. The worst thing is that this plan is totally unnecessary as the works could remain where they are in Milton.</i></p> <p>This RR relates to the pre-operational period. Is this a consideration that ought to be assessed as part of ES Chapter 12 ES? Please justify your response and, if relevant, quantify the effect.</p>
12.13	Applicant, CCC	<p>Cumulative effects – Cambridge North Residential Quarter</p> <p>a) Please provide the reference number for the application noted at para 3.5.16 of ES Chapter 22 [AS-044].</p> <p>b) Has that application been determined? If yes, please provide details including a record of the decision, the Officer's report and site layout plan(s) showing the boundary of the site.</p> <p>Para 3.5.18 of ES Chapter 22 states: <i>In addition, there are significant beneficial health effects during operation on accessible housing, housing mix and affordability, walking and cycling, open space, play space and access to nature, and local employment.</i></p> <p>c) How would the Proposed Development provide <i>significant beneficial health effects</i> during operation on accessible housing, housing mix and affordability?</p> <p>d) If this application for the proposed WWTP is not consented, could those <i>significant beneficial health effects</i> on accessible housing, housing mix and affordability be achieved in another way? Please justify your response.</p>
12.14	Applicant	<p>Proposed WWTP - East of England Ambulance Service NHS Trust (EEAST) resources</p> <p>EEAST's RR [RR-012] indicates that that the Proposed Development would have significant resource implications for the organisation. Please endeavour to agree with EEAST the resources that it considers would be needed and how these would be secured in the event that development consent is granted.</p>
12.15	Applicant, CCC, SCDC	<p>Proposed WWTP – mitigation measures</p> <p>In relation to the operational phase of the proposed WWTP, on page 74 of ES Chapter 12 [APP-044] it is stated that the potential risk to human health from water pollution would be dealt with in documents which form part of the Construction Environmental Management Plan (CEMP).</p> <p>Given that the CEMP would relate to the construction phase, is this the most appropriate mechanism to deal with operational phase effects? If not, how should this be dealt with / secured?</p>
12.16	Applicant	<p>Proposed WWTP – mental health impacts</p> <p>The RR of South Cambridgeshire District Council [RR-004] states that <i>In respect of the mental health and wellbeing assessment as part of this Chapter of the ES, the District Council is satisfied that baseline measurements have been</i></p>

		<p><i>taken (page 13). However, it is noted that no specific reference has been included in chapter 5.2 of this chapter as to how mitigation would be secured or when further assessments would be undertaken to monitor change. The District Council considers this information needs to be provided and secured by DCO requirement.</i></p> <p>Do you agree with SCDC's suggested use of a Requirement in relation to this matter? If yes, please draft a Requirement and endeavour to agree it with SCDC. If not, please explain why you do not agree.</p>
13. Historic environment		
13.1	Historic England, CCoC, CCC, SCDC	<p>Assessment</p> <p>Are the parties satisfied with the heritage assessment and effects as reported in ES Chapter 13 [AS-030]. If not, please explain the reasons why.</p>
13.2	Applicant	<p>Effects</p> <p>ES Chapter 13 [AS-030] assesses all reported adverse effects on designated heritage assets, even those which would be moderate adverse and thus significant, as 'less than substantial harm' to the significance of the asset. Please clarify how this term has been defined and determined.</p>
13.3	Applicant	<p>Effects</p> <p>The ES Chapter 13 summary on pages iv and v [AS-030] concludes that there would be no residual effects during construction and operation. However, could effects on designated heritage assets which are identified as 'less than substantial harm' be considered a residual effect?</p>
13.4	Applicant	<p>Baseline</p> <p>ES Chapter 13 para 3.1.19-23 [AS-030] consider the 'built heritage' baseline and mention Poplar Hall Grade II listed building. Why does this section not mention Biggin Abbey Grade II* listed building given that it has been considered elsewhere?</p>
13.5	Applicant	<p>Heritage assets</p> <p>ES Chapter 13 para 2.9.13 [AS-030] refers to 'Red House Close'. However, Red House Close is not mentioned elsewhere in ES Chapter 13 and nor does Red House Close (HE1404 on [AS-047]) appear to be included in Table 1.4 of ES Appendix 13.4 [AS-085] (along with other non-designated heritage assets mentioned in Table 1.8 of ES Appendix 13.2 [AS-081]. Please explain the reason for this and review Tables 1.4 and 1.8 as necessary.</p>
13.6	Applicant	<p>Heritage assets</p> <p>ES Chapter 13 para 3.1.19-23 [AS-030] do not appear to identify the number of listed buildings within the 1km study area (of which there appear to be many according to Figures in [AS-047]), as they do for other built heritage assets. Please:</p> <ul style="list-style-type: none"> a) clarify the number of listed buildings in this regard; and b) clarify why they have not been considered further in the assessments, as have been explained for those listed buildings outside the 1km study area though within the wider ZTV (i.e. in para 3.1.22).
13.7	Applicant	Terminology

		ES Chapter 13 para 3.1.24 [AS-030] mentions 'designated historic landscape assets'. Is this referring to conservation areas? If so, is it accurate to identify them as designated historic landscape assets and might this be unclear to the general reader?
13.8	Applicant	Construction ES Chapter 13 para 4.2.15 [AS-030] suggests there would be construction works in the north of Horningsea Conservation Area. However, Figure 13.4 [AS-047] indicates that the Order limits do not extend into this conservation area. Please clarify.
13.9	Applicant	Construction Some RRs raise concerns around construction traffic through Horningsea Conservation Area and Fen Ditton Conservation Area. ES Chapter 13 [AS-030] indicates such traffic would be routed around these areas and would be secured in the CoCP and CTMP [AS-109]. Please clarify where this is specified / secured within the CoCP and CTMP submitted with the application, noting that 'Figure 3.1' (Vehicle Routing Plan) as referenced in the CTMP does not appear to have been included within the document?
13.10	Applicant	Effects ES Chapter 13 para 4.2.59 [AS-030] refers to <i>Eye Hall (HE080)</i> , <i>Barn to East South East of Eye Hall (HE081)</i> and <i>Granary to East of Eye Hall (HE082)</i> (all Grade II listed and of high heritage value). Please clarify the significance of effect on these designated heritage assets, as it is unclear from para 4.2.62 to 4.2.64, and the reasons they are not listed in Table 5-1 of ES Chapter 13 or mentioned elsewhere in this chapter (e.g. baseline section)?
13.11	Applicant	Effects ES Chapter 13 [AS-030] reports a number of temporary and permanent adverse construction effects. Does this mean that the permanent adverse construction effects would prevail throughout the operational period, given their permanence, and would thus be residual effects?
13.12	Applicant	Policy The NPPF sets out that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation and that any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting), should require clear and convincing justification. Additionally, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. NPSWW reiterates these points. Please identify what you consider to be the public benefits which the ExA should take into account.
13.13	Applicant	CEMP ES Chapter 13 para 2.9.10 [AS-030] suggests that the CEMP and associated management plans would be approved by the Employer and would remain 'live' documents. Please clarify how this approach aligns with R9 (Construction environmental management plan) of the dDCO which indicates just a single document would be submitted for approval with no requirement to review it.

13.14	Applicant	Land restoration ES Chapter 13 [AS-030] sets out that land would be reinstated where necessary after construction. Whilst measures for land reinstatement are identified in the CoCP and oSMP, should land reinstatement / restoration also be a specific requirement in the dDCO?
13.15	Applicant	Effects SCDC's RR [RR-004] suggests an under-reporting of effects on: Biggin Abbey GII* listed building during construction, given the period over which construction works would occur; and on Biggin Abbey GII* listed building, Poplar Hall GII listed building, Horningsea Conservation Area, Fen Ditton Conservation Area and Baits Bite Lock Conservation Area during operation. Please further justify your assessment of effects in light of SCDC's comments.
13.16	Applicant	Parameters The ES Chapter 13 Table 2-6 [AS-030] states that the Terminal Pumping Station would be <i>40m below ground level</i> . Is this consistent with the parameters set out in Schedule 14 of the dDCO and if not, does this have any implications for the historic environment assessment (e.g. archaeology)?
13.17	Historic England, CCC, SCDC, CCoC	Archaeology Are the parties satisfied with the level of detail in the outline Archaeological Investigation Mitigation Strategy (AIMS) [AS-088] and CoCP Part A [APP-068] to inform the AIMS secured under R13 of the dDCO [AS-139]?
13.18	Applicant	Figures The annotation of HE002 and HE003 on Figure 13.9 [AS-047] does not appear to correlate with the reference numbers of these heritage assets listed in para 3.1.11 of ES Chapter 6 [AS-030]? Please clarify / rectify.
14. Landscape and visual		
14.1	CCC SCDC CCoC	Assessment Please confirm whether you are satisfied with: a) the study area; and b) the viewpoint (VP) / photomontage locations selected, as identified within ES Chapter 15: Landscape and Visual Amenity [AS-034]. If not, please explain the reasons for this.
14.2	CCC, SCDC, CCoC	Assessment Please confirm whether you are satisfied with: a) the Applicant's Landscape and Visual Impact Assessment (LVIA) methodology; and b) its assessment of effects in respect of landscape and visual receptors. c) If not, please explain the reasons for this.
14.3	Applicant	Guidance SCDC's RR [RR-004] makes reference to the Landscape Institute's Technical Guidance Note 2/19 on Residential Visual Amenity. Has consideration been given to this document in the assessment and if not, please explain the reason for this.

14.4	Applicant	<p>Wicken Fen Vision NT's RR [RR-031] suggests that there are opportunities to enhance the Wicken Fen Vision area beyond that of the Order limits. To what extent has this been considered by the Applicant and is this something that the Applicant would be willing to explore with NT further?</p>
14.5	Applicant	<p>Photographs The photograph from VP8 [AS-099] was not taken due to site development works. Does the Applicant intend to revisit VP8 at any point in the Examination to take the photograph? If not, please provide justification.</p>
14.6	Applicant	<p>Landscape planting Some RRs (e.g. SCDC's [RR-004]) raise concerns around difficulties of plant / trees establishment on a made bank / bund and thus their effective longer term screening potential. Please clarify what specific measures would be required to ensure the establishment and survival of such planting and where this is secured.</p>
14.7	Applicant	<p>Effects ES Chapter 15 [AS-034] reports no cumulative effects on landscape and visual receptors. However, please clarify whether, where for example, moderate adverse effects during construction have been reported separately for the proposed WWTP element and the proposed Waterbeach pipeline element (e.g. VPs 11, 22 and 25), this could result in an overall effect of greater than moderate.</p>
14.8	Applicant	<p>Future works How can the Applicant be certain that any future expansion of the capacity of the proposed WWTP could be accommodated within the proposed WWTP and bunded area, noting concerns raised by some IPs relating to this (e.g. [RR-151])?</p>
14.9	Applicant	<p>Mitigation ES Chapter 15 para 2.9.11 [AS-034] directs to Table 2-7 for primary and tertiary mitigation. However, Table 2-7, titled 'Primary and tertiary mitigation [...]', identifies no tertiary mitigation. Please explain the reasons for this and amend Table 2-7 as necessary. In addition, there is a blank para 2.9.10 – please rectify as necessary.</p>
14.10	Applicant	<p>Error ES Chapter 15 para 2.9.10 [AS-034] appears to have text missing. Please clarify / rectify.</p>
14.11	Applicant	<p>Trees ES Figure 8.3 [AS-050] indicates that two veteran trees may be affected by the Proposed Development (Waterbeach pipeline element). NPSWW para 4.5.13 addresses the considerations relating to impacts on veteran trees. However, these are not mentioned in NPSWW Accordance Table [ASS-130] at the relevant section. In addition, it is unclear from the Arboricultural Impact Assessment (AIA) [APP-104] to what extent these trees may be affected. The ExA also notes the Woodland Trust's RR [RR-040] on the matter, including relevant standing advice on root protection areas for such trees. On this basis, please: a) Update the NPSWW Accordance Table as appropriate;</p>

		<p>b) Amend the AIA as necessary to identify impacts on veteran trees (as it appears to currently provide for a smaller root protection area than the standing advice for T105); and</p> <p>c) Provide or signpost to the associated tree protection plans referred to in the AIA (i.e. in para 8.1.1).</p>
14.12	Applicant	<p>Requirements</p> <p>R7(c) (as well as R11) of the dDCO relates to landscape planting.</p> <p>a) Should R7 also make reference to the LERMP given that this forms the basis of the landscape masterplan associated with the proposed WWTP;</p> <p>b) Does R7 (c) relate to all land within the Order limits; and</p> <p>c) Should R7(c) specify information to be provided, such as numbers, sizes and species, and should it require details of hard landscaping and landscape management also?</p>
14.13	Applicant	<p>Landscape planting</p> <p>ES Chapter 15 para 4.2.11 [AS-034] states that initial planting and reinstatement planting would occur during the construction phase and that this is set out in the CoCP Parts A and B. Please clarify where this is stated in these documents, noting that, for example, CoCP Part A para 7.2.68 [APP-068] states that reinstatement planting would be undertaken following construction?</p>
14.14	Applicant	<p>Requirements</p> <p>LERMP para 4.3.5 [AS-066] indicates that the relevant local planning authority and NE would be the approval bodies for discharging R11 of the dDCO. However, NE is not referred to in this requirement. Please clarify.</p>
14.15	Applicant	<p>Requirements</p> <p>LERMP para 5.1.4 [AS-066] suggests that monitoring obligations are secured under a requirement of the dDCO and would be approved by the relevant local planning authority and NE. Where is this specified / secured in the dDCO?</p>
14.16	Applicant	<p>Maintenance</p> <p>In respect of LERMP Table 4.2 [AS-066] –</p> <p>a) For 'Proposed new areas of woodland', the 'At each maintenance visit' section says that timeframes and /or timings are not applicable. Please clarify, given that maintenance visits are likely to be needed to ensure establishment.</p> <p>b) It is stated that any trees which fail to establish in the first year will be replaced. Please justify this timeframe, given that assessments rely on effective woodland screening / establishment over a much longer period and that for 'Proposed new tree, shrub and hedgerow planting', it is indicated that any trees which fail within five years would be replaced (and noting that Table 5.1 indicates that any failures of woodland and trees, shrubs and hedgerows over a 30 year period would be replaced).</p>
14.17	Applicant	<p>Lighting</p> <p>ES Chapter 15 Table 5-1 [AS-034] and Lighting Assessment Report Table 4-4 [AS-100] state that lighting would be excluded from the proposed WWTP access road. Please signpost to where this is specified in the Lighting Design Strategy [APP-072], and if it is not, should it be?</p>
14.18	Applicant	Wider landscaping

		The LERMP para 1.1.9 [AS-066] notes that it focuses on the area around the proposed WWTP. Where is it specified / secured that landscape elements in the wider Order limits would be protected / reinstated / managed to ensure establishment (e.g. along the proposed Waterbeach pipeline corridor and around the proposed outfall area)?
14.19	Applicant	Assessment Regarding the landscape and visual assessment / lighting assessment: a) Would the proposed WWTP boiler stack (or any other feature) emit a plume, and would the flare stack emit a flare? b) If so, have these factors been taken into account in the landscape and visual assessment, lighting assessment and photomontages? c) If not, please provide an assessment in this regard or justify why this had been omitted from the assessments, noting that some RRs make reference to this (e.g. [RR-212 and RR-072]).
14.20	Applicant	Lighting [RR-061] raises a concern that no information appears to be provided in either the Lighting Design Strategy [APP-072] or the Lighting Assessment Report [AS-100] for the proposed workshop building. Please comment on this concern.
14.21	Applicant	Effects ES Chapter 15 Table 4-6 [AS-034] reports moderate adverse (significant) effects at Year 15 from VP17 due to views being less open as a result of hedgerow and woodland planting (as illustrated on Photomontage 6 [APP-127]). Has consideration been given to less dense planting to allow glimpsed views through, and if so, might this reduce adverse visual effects from this viewpoint (and along Low Fen Drove Way in general)?
15. Land quality		
15.1	Applicant	Assessment The EA [RR-013] considers that there is insufficient preliminary assessment and analysis of contamination in order to demonstrate that there would be no detrimental impact on groundwater. Regarding the Preliminary Risk Assessment [AS-089], please provide clarification why the conceptual site model and preliminary qualitative risk assessment (PRA) make no reference to the Waterbeach Water Recycling Centre (WRC). Please clarify why the ENVIROCHECK report covers only part of the area within the Order Limits.
15.2	EA	Consents, permits and licences Do you have any reason to believe that any operational pollution control permits or licences, or other relevant consents would not subsequently be approved if the dDCO were granted?
15.3	EA	NPSWW Do you consider that the Proposed Development meets with the requirements of policy 3.7.8 of NPSWW which states that: <ul style="list-style-type: none"> • the relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework; and

		<p>• <i>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.</i></p>
15.4	Applicant	<p>Assessment The EA [RR-013] notes that regarding the Geoenvironmental Results Waterbeach [AS-093] there has been no testing for ammonium or pesticides even though these were identified as potential contaminants within the Preliminary Risk Assessment, and no testing was targeted to the Waterbeach Water Recycling Centre. It also notes a lack of testing of groundwater for this part of the scheme. The EA also state that regarding the Geoenvironmental Results proposed WWTP [AS-091] there was no testing for Methyl tert-Butyl Ether or pesticides even those were identified as potential contaminants within the Preliminary Risk Assessment. The EA does not regard these matters as acceptable – please justify your approach.</p>
15.5	EA, CCoC, SCDC, CCC	<p>Monitoring Within ES Chapter 14 Land Quality [AS-032], the Applicant concludes that no monitoring is required for decommissioning of the Proposed Development for land quality purposes. Do you agree with this conclusion? If not, what monitoring do you propose?</p>
15.6	EA	<p>Licences, permits and decommissioning Do you have any comments or concerns regarding the proposed details from the Applicant regarding:</p> <ol style="list-style-type: none"> the surrendering of licences for the existing WWTP under the EA's RGN 9: Surrender Guidance, including the Sludge Treatment Centre (STC) Interim Industrial Effluent Discharge; The biological treatment works itself or existing Cambridge WWTP - Industrial Effluent Discharge; Monsal/Combined Heat and Power Plant Medium Combustion Permit; Do you have any other comments regarding the Outline Decommissioning Plan [AS-051] proposed by the Applicant?
15.7	Applicant	<p>Assessment Within the Outline Decommissioning Plan [AS-051], it is noted that various pieces of equipment would have holes drilled into them in order to allow rainwater to escape. Are there opportunities for contaminants to leak out of the plant equipment? Please direct the ExA to where this has been taken into consideration as part of the ES.</p>
15.8	Applicant	<p>Monitoring The EA suggests [RR-013] that on a precautionary basis it would like to see operational phase groundwater quality monitoring for the wider scheme so that any unacceptable impacts to can be detected and appropriate mitigation measures implemented. The EA appears to be particularly concerned about potential leakages from infrastructure that would be used for underground or sub-water table transmission of pollutants. Please continue further discussion with the EA on this matter and provide an update on this to the ExA.</p>
15.9	EA	Review of Appendix 20.8

		Have you reviewed Appendix 20.8: Update to Contaminant Transport Model [APP-158] digital ConSim models for the contaminant transport modelling assessment? Do you have any additional comments?
15.10	CCoC, CCC, SCDC	Mineral Safeguarding Areas Do you consider that the Mineral Safeguarding Areas are adequately protected and do you consider the Applicant's conclusions within ES Chapter 14 [AS-032] regarding mineral safeguarding are acceptable and meet with local and national policy requirements?
15.11	Applicant	Mitigation ES Chapter 14 [AS-032] states that it is proposed to reuse as much as possible of any of the extracted minerals within the Proposed Development. Please identify where this is secured.
15.12	Applicant	Contamination land regime Please provide more information regarding the contaminated land regime which the Applicant proposes would control any existing contamination risks during construction within ES Chapter 14 [AS-032].
15.13	CCoC, CCC, SCDC, EA	Review of additional information provided by the Applicant in response to ExA's Procedural Decision Please provide comments on the updated information contained within ES Chapter 14 [AS-032] and the associated new and updated appendices [AS-089 to AS-098] in relation to the impacts on land quality received on 29 th September 2023 from the Applicant.
15.14	Applicant	Disposal of waste How would disposal of waste materials from decommissioning be controlled from a contamination perspective?
16. Major accidents and disasters		
16.1	Applicant	Clarification – CEMP Para 4.2.37 of ES Chapter 21 [AS-042] states that <i>Section 7.5 of the CoCP Part A, Water resources and flood risk, sets out a framework for the control of flood risk during construction, identifying a number of 'standard' mitigation measures which will be implemented whilst construction work takes place. These will be reflected in an appended plan to/as part of the CEMP.</i> Which of the documents listed under dDCO R9 [AS-139] would set out this information?
16.2	Applicant	Clarification – transportation of hazardous loads Page 32 of ES chapter 21 [AS-042] notes that the assessment of the impact of the Proposed Development in relation to traffic accidents would be addressed in the ES Chapter 'Traffic and transport'. Please clarify where the risk of accidents associated with the transportation of potentially hazardous loads (including waste and flammable substances such as liquified natural gas) has been set out, along with where details of mitigation can be found.
16.3	Applicant	Clarification – decommissioning

		Para 2.7.33 of ES Chapter 21 [AS-042] states that <i>Decommissioning of the existing Cambridge WWTP would be subject to a Decommissioning Management Plan which is to be agreed with the Local Planning Authority. An outline Decommissioning Management Plan (Application document Reference 7.18) describes measure applied to this activity. Post grant of the DCO and prior to commencement of decommissioning a detailed plan will be prepared and agreed with the Local Planning Authority.</i> The application submission includes an 'Outline Decommissioning Plan' [AS-051] but not 'An outline Decommissioning Management Plan' and the ExA has been unable to locate a document with a reference of 7.18. Please clarify.
16.4	Applicant	Clarification – emergency response plans Para 4.2.26 of ES Chapter 21 [AS-042] refers to Emergency Response Plans required by section 5.6 of the CoCP Part A and also refers to an Emergency Preparedness Plan(s). Please indicate where Emergency Response Plans are referred to in CoCP Part A [APP-068] and explain how the Emergency Response Plan would differ from the Emergency Preparedness Plan.
16.5	Applicant	Consultation responses Table 1-2 of ES Chapter 21 [AS-042] refers to pre-application consultation. a) Please provide copies of the responses of DEFRA, the HSE and the MoD. b) Have there been any changes to the proposals since those responses were issued that could change the conclusions of any of these parties?
16.6	Applicant, CCC, SCD, CCoC	Planning policy Para 1.3.4 of ES Chapter 21 [AS-042] introduces local policy by noting that <i>Local planning policies of relevance to the Proposed Development includes: [...]</i> a) Are there any other policies that should be taken into account which are not listed in this chapter of the ES? b) Are there any emerging local policies that you consider to be potentially Important and Relevant? c) Are there any Neighbourhood Plan or Minerals and Waste Local Plan policies that you consider to be potentially Important and Relevant? d) Are the local authorities content that all relevant development plan policies have been referred to? If not, which additional or alternative policies should be included?
16.7	Applicant	Planning policy Para 1.3.4 of ES Chapter 21 [AS-042] refers to Policy 19 of the Cambridge Local Plan 2018. Is this policy number correct?
16.8	Applicant, DEFRA	Planning policy Para 3.12.3 of NPSWW states: <i>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.</i> Please provide an update on DEFRA's position.

16.9	CCoC, National Highways	<p>Construction phase – vehicle movements including Abnormal Indivisible Loads</p> <p>At para 2.7.26 and 2.7.27 of ES Chapter 21 [AS-042] it is stated that <i>An Operational Traffic Management Plan would be prepared post consent in relation to the management of operational traffic movements</i> and that <i>The requirements to prepare and implement the OTMP is secured through a requirement of the draft DCO (Application Document Reference 2.1) for approval and implementation of the OTMP.</i></p> <p>Do the highways authorities accept that all detail should be reserved until any development consent has been granted or should any grant of development consent be dependent on it being demonstrated (<i>inter alia</i>) that there are safe routes for all types of vehicles serving the proposed WWTP site?</p>
16.10	Applicant	<p>Existing WWTP – post-decommissioning – <i>Please note that this question also relates to the Health chapter of the ES and RRs related to that chapter</i></p> <p>CCC's RR [RR-002] notes that the duration and process of decommissioning has not been explained and that this should be clearly set out to ensure that negative impacts have been appropriately mitigated. It makes a similar point in relation to security measures and anti-social behaviour. CCoC's RR [RR-001] also seeks this information, noting that there are concerns that once the site is decommissioned there may be a considerable gap until the site is redeveloped. CCoC considers that the impacts on human health have not adequately been addressed.</p> <p>Once the existing WWTP has been decommissioned:</p> <ol style="list-style-type: none"> how would this location be secured to prevent unauthorised access, occupation or deposit of waste (fly-tipping), or other anti-social behaviour? would there be any way by which contaminants could be added to the water network via the decommissioned site, whether by accident or deliberately? would any buildings or structures containing asbestos and where asbestos could be exposed by vandalism, an accident or deterioration, be left on the site? could structures such as settlement tanks fill with water (e.g. by rainfall) and pose a safety risk in the event of unauthorised access? <p>Please explain for how long any such risks would last, how they would be mitigated and by whom.</p>
16.11	Applicant	Operational phase – Environmental Management System

		<p>Para 4.4.7 and 4.4.8 of ES Chapter 21 [AS-042] state that <i>The earth bank will be designed and constructed according to industry best practice earthworks standards. The earth bank would be designed to have effective drainage and would be subject to ongoing monitoring as part of the Landscape Ecology and Recreation Management Plan (LERMP) which would be applied for 30 years as a minimum as part of the biodiversity net gain (BNG) obligation (Application Doc Ref 5.4.8.14) and In the event that structural failure of the earth bank occurred the Applicant would implement operational management plans and procedures. The management plans and procedures will sit within the EMS required under the environmental permitting regime. Including enacting emergency response plans.</i></p> <p>a) Where in the LERMP is monitoring of the structural integrity of the earth bank provided for? b) Why is integrity of the earth bank considered to be part of the BNG obligation? c) What obligation would there be on the Applicant to restore the earth bank in the event of its failure and how would such an obligation be secured and enforced?</p> <p>There is reference to an Environmental Management System (EMS) in relation to this and other mitigation measures.</p> <p>d) Please provide a list of all mitigation measures that would be included in the EMS. e) Who would approve the EMS? f) How could it be guaranteed that mitigation measures noted in the ES would be included in the EMS or that the EMS approval body would accept the inclusion of those matters in the EMS? g) How would the failure to comply with measures / undertakings in the EMS be enforced?</p>
16.12	Applicant	<p>Operational phase – risk management Para 4.4.47 of ES Chapter 21 [AS-042] states: <i>The risk of fire from flaring will be managed through designed in line with the Applicants DSEAR guidance.</i></p> <p>Para 4.4.48 of ES Chapter 21 [AS-042] states: <i>To mitigation against an on-site incident, under the EMS and operation procedures development for the proposed WWTP, the operator will prepare and test emergency procedures for dealing with the consequences of a major accident. The management system is required to include the risk management measures specified in the HAZOP and DSEAR plans and cover planned maintenance (Environment Agency, 2022).</i></p> <p>a) What are the HAZOP and DSEAR plans? Please provide a copy of these. b) Please provide a copy of the Applicant's 'DSEAR guidance'. How does this differ from the DSEAR plan? c) How would adherence to this guidance be secured / guaranteed?</p>
16.13	Applicant	<p>Operational phase – hazardous area classification Para 4.4.44 of ES Chapter 21 [AS-042] relates to Hazardous Area Classification.</p> <p>a) Has Hazardous Area Classification been conducted to inform the layout of the proposed WWTP?</p>

		b) Could activities taking place in the publicly-accessible space outside of the perimeter fence, such as the use of electrically-assisted bicycles and tobacco smoking, increase the risk of an incident?
16.14	Applicant	<p>Operational phase – biogas holder safety</p> <p>Para 4.4.46 of ES Chapter 21 [AS-042] states that <i>The biogas holder is to be shielded from areas of frequent access of the general public by the earth bank. The gas holder is located over 300m from the A14 and approximately 800m from the nearest public dwelling.</i></p> <p>a) Section A on Plan 4.9.2 of the Design Plans [APP-023] appears to indicate that the biogas holder would be significantly taller than the earth bund – please explain how the bund would shield receptors outside of the site.</p> <p>b) How far would the biogas holder be from the on-site office accommodation and Discovery Centre?</p> <p>c) Would the occupants / users of the on-site office accommodation and Discovery Centre be shielded in the event of an explosion?</p> <p>d) If an explosion was to occur, how would this affect the on-site office accommodation and Discovery Centre?</p>
16.15	Applicant	<p>Operational phase – safety of the workforce and visitors</p> <p>At para 2.7.20 of ES Chapter 21 [AS-042] it is stated that <i>...an emergency muster point will be positioned away from the offices that it is easily accessible and large enough for all of the workforce at that location to assemble and be accounted for....</i></p> <p>a) Where would this be located – would the visitors' car park be too close to the office building to be a safe muster point?</p> <p>b) If the visitors' car park was used as a muster point, where would emergency vehicles park in the event of an emergency?</p> <p>c) Would the muster point be accessible to people with reduced mobility?</p>
16.16	Applicant	<p>Operational phase – security and safety, access and evacuation</p> <p>ES Chapter 21 [AS-042] para 4.4.58 states that <i>The Proposed Development is vulnerable to malicious attack resulting in damaging equipment within the site facilities.</i> Para 4.4.59 and 4.4.60 state that <i>Design measures include the earth bank as well as perimeter fencing, the use of surveillance equipment to monitor the facility, security-controlled access and egress points and Physical security design measures following NSPA guidance (NSPA, 2023) will be incorporated to ensuring the site is secure from unauthorized personnel.</i></p> <p>The drawing on page 100 of the DAS [AS-168] shows the alignment of the proposed WWTP's <i>secure boundary</i> as a broken red line. The line is between the bunding and the proposed WWTP. Para 7.9.2 of the DAS [AS-168] states that <i>The Gateway Building provides the main arrival point for workers and visitors, located at the convergence of the primary access road, the pedestrian and cycle route, the earth bank and the plant works. It provides access to the controlled areas of the landscape, including onto the earth bank and into the secure works site, and provides passive surveillance of the whole works from the offices within.</i></p>

		<p>Table 2-25 of ES Chapter 2 [APP-034] states that CCTV cameras would be inside the perimeter fence boundary.</p> <ol style="list-style-type: none"> What is the approximate circumference of the secure boundary? The application drawings show one point of access to / egress from the proposed WWTP but the above text implies that there would be more than one access / egress (<i>security-controlled access and egress points, the main arrival point</i>). Please confirm whether other points of access / egress which are not shown on the application drawings are intended to be provided. If so, please also indicate whether paths or roads would be provided to access these. Could the location of the Fuel Storage Area near the site's only access / egress and office building (Plan 4.9.1 of the Design Plans [APP-023]) prejudice the safe evacuation of the site in the event of an incident involving the fuel storage, or increase the risk of harm to people in the Gateway Building? Would it be safer to locate fuel storage elsewhere on the site? Would it be safe or desirable for the solar panel arrays to be located outside of the secure boundary? Could there be a need to erect fencing to protect them from vandalism etc? If there is a need for fencing, please provide indicative details of its location and height. In the event that the main site entrance was blocked / could not be used (e.g. because it was the location of an incident), how would emergency services such as the fire brigade access the site? How would staff evacuate the site? If the fire brigade needed to tend to an emergency within the secure boundary from a location outside of the secure boundary, would fire hydrants be available outside of the boundary? How would emergency services and site security access areas around the outside of the secure boundary bearing in mind the size of the site and length of the boundary – would this be by motorised vehicle? If so, how would vehicles travel from the site access road, bearing in mind the absence of roads around the proposed WWTP secure boundary and the proposed topography (which includes drainage ditches, ridges and furrows etc.)? Bearing in mind the curved secure boundary fence, would CCTV cameras need to be pole-mounted outside of the secure boundary fence to enable good coverage? If so, how many would be needed, how high would the mounting poles be, and how visible would these be from outside of the site?
16.17	East of England Ambulance Service NHS Trust (EEAST); Cambridgeshire Fire and Rescue Service	<p>Construction and operational phases – emergency service access</p> <ol style="list-style-type: none"> Please provide details of alternative route planning that has been undertaken for ambulances and fire tenders for situations where roads are closed (including for AILs) or experiencing heavy congestion that could prevent emergency vehicles from safely accessing the worksites. Has an area been identified for Helicopter Emergency Medical Services (HEMS) access at each of the worksites? Has the fire and emergency rescue service responded in relation to the layout of the development for rescue and fire-fighting purposes? If not, please provide a response. Would congestion on Horningsea Road prevent or slow down responders' journeys to locations other than the site? If so, how could any such concerns be overcome?

16.18	Applicant	<p>Electricity transmission towers</p> <p>Taking account of the proposed landscaping, would maintenance vehicles be able to access all electricity transmission towers around the site?</p>
16.19	Applicant, Cambridge City Airport	<p>Cambridge City Airport</p> <p>Page 19 of ES Chapter 21 [AS-042] states that: <i>The Code of Construction Practice (CoCP) (App Doc Ref 5.4.2.1) requires that relevant permits and approvals in relation to cranes and tall plant are obtained from the operators of Cambridge Airport prior to the commencement of construction.</i></p> <p>To the Applicant:</p> <p>a) Please indicate where in the CoCP Part A [APP-068] and in the Consents and Permits Register [AS-123] the requirement to obtain <i>relevant permits and approvals</i> is set out.</p> <p>b) CoCP Part A [APP-068] refers to a highest point of 10 metres at para 5.12.2 and a highest point of 15 metres at para 5.15.1. Please explain why there are two height thresholds.</p> <p>To Cambridge City Airport:</p> <p>c) Is the airport operator satisfied with the proposed arrangements included in the CoCP and in any relevant Requirements? If not, what should be changed / added?</p>
16.20	Applicant	<p>Cambridge City Airport</p> <p>Para 4.4.28 of ES Chapter 21 [AS-042] states: <i>Further consultation with Cambridge Airport will be in relation to the detailed design and orientation of buildings and lighting.</i> How would this consultation be secured / guaranteed?</p>
16.21	Applicant	<p>Cambridge City Airport – operational WHMP</p> <p>Para 2.7.31 of ES Chapter 21 [AS-042] states: <i>The Environment Manager will be responsible for the preparation and implementation of the operation WHMP including appointing suitably qualified and experience staff or contractors to undertake operational monitoring of birdstrike risk.</i> How would this be secured and enforced?</p>
16.22	Applicant	<p>dDCO</p> <p>Schedule 2 Part 1 of the dDCO [AS-139] defines <i>decommissioning</i> as <i>the process for decommissioning the existing Cambridge WWTW as described in the outline decommissioning plan.</i> Does this definition need to include any other decommissioning works, for example Waterbeach Water Recycling Centre?</p>
17. Material resources and waste		
17.1	Applicant	<p>Policy – NPPF</p> <p>Para 1.3.4 of ES Chapter 16 [APP-048] states: The National Planning Policy Framework (NPPF) (Ministry of Housing, Communities [sic] & Local Government, 2021) sets out policies for development and makes specific reference to Section 17: Sustainable use of minerals. This includes the use of secondary and recycled materials and mineral waste before considering extraction of primary materials.</p> <p>a) Does the Applicant agree that this policy relates to plan-making?</p> <p>b) If so, should the decision-maker pay regard to it?</p>

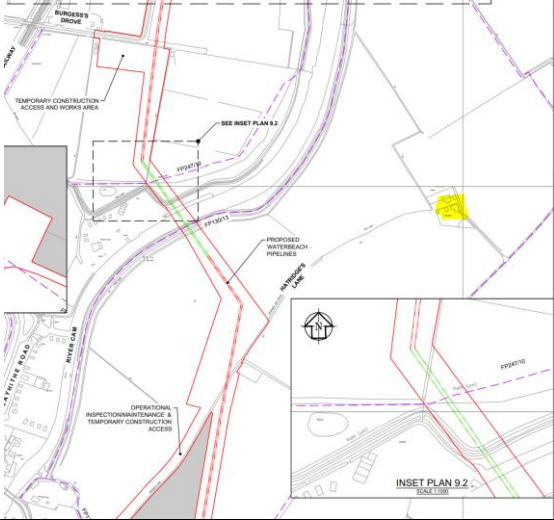
		c) Are any other parts of the NPPF Important and Relevant, e.g. para 4 and 8?
17.2	Applicant	<p>Policy – Minerals and Waste Local Plan 2021</p> <p>Please explain the relevancy of the following policies, which are listed at para 1.3.14 of ES Chapter 16 [APP-048], to the assessment of material resources and waste:</p> <ul style="list-style-type: none"> – Policy 3: Waste management needs; – Policy 4: Providing for waste management; – Policy 10: Waste management areas; – Policy 11: Water recycling areas; – Policy 14: Waste Management Needs Arising; – Policy 16: Consultation areas; – Policy 17: Design; and – Policy 19: Restoration and aftercare.
17.3	The Applicant, CCoC	<p>Policy – interpretation of policy in Minerals and Waste Local Plan 2021</p> <p>Policy 24 is noted at para 1.3.14 of ES Chapter 16 [APP-048]. The policy states that:</p> <p><i>Mineral or waste development which adversely affects agricultural land categorised as ‘best and most versatile’ will only be permitted where it can be shown that:</i></p> <ul style="list-style-type: none"> (a) <i>it incorporates proposals for the sustainable use of soils (whether that be off-site or as part of an agreed restoration scheme); and</i> (b) <i>(for non-allocated sites) there is a need for the development and an absence of suitable alternative sites using lower grade land has been demonstrated.</i> <p>Para 2.11.4 of Chapter 3 – Appendix 3.3 ‘Stage 2 Site Selection Report - Coarse Screening’ [APP-076] states that A review of the ALC maps covering the study area shows that all of the longlisted site areas comprise greater than 50% ‘Best and Most Versatile Land’. This means that there is no clear differentiation between any of the site areas under this criterion. Therefore, this assessment has been removed from the Stage 2 coarse screening RAG assessment and will not be included in the final comparison of results.</p> <p>Best and Most Versatile (BMV) agricultural land is graded 1 to 3a. The other agricultural land grades are 3b, 4 and 5.</p> <ul style="list-style-type: none"> a) Is there a ‘need’ for the Proposed Development within the meaning of the term ‘need’ as used in the Minerals and Waste Local Plan? If so, please explain the ‘need’ and how the Proposed Development satisfies that ‘need’. b) Whilst four grades of agricultural land are referred to as ‘BMV’, are there differences between the quality of land in grades 1, 2, 3 and 3a? If so, would it be preferable to prioritise the protection of higher-grade BMV land over lower-grade BMV land?

		<p>c) Does part (b) of Policy 24 prefer lower-grade sites that are still BMV (e.g. does it prefer Grade 3 to Grade 1)? Please justify your response.</p> <p>d) To Applicant only: What percentage of sites F, H, K and L (shown on page 4 of [APP-076]) are Grade 1, Grade 2, Grade 3, and Grade 3a agricultural land? Please give a separate percentage for each grade.</p>
17.4	Applicant	<p>Policy – NPPW Para 1.3.6 of ES Chapter 16 [APP-048] discusses NPPW policies relating to non-waste development. Please explain why these are relevant to the decision on this application for a DCO.</p>
17.5	CCC, SCDC, CCoC	<p>Policy – NPSWW Para 4.14.5 of NPSWW states that <i>The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a Site Waste Management Plan</i>. R9 of the dDCO [AS-139] indicates that a SWMP would be part of the construction environmental management plans to be submitted after an Order is made.</p> <p>Are the relevant authorities content with this approach or do you require further detail at this stage? If further detail is required at this stage, please explain why you do not consider it appropriate to deal with such detail under R9 of the dDCO.</p>
17.6	Applicant	<p>Policy – emerging Local Plan Para 1.3.17 of ES Chapter 16 [APP-048] refers to the emerging local plan, supporting documents and topic papers. In respect of 'Material resources and waste', please set out which of these policies or documents you consider to be Important and Relevant to the decision on this application.</p>
17.7	Applicant	<p>Policy – draft NECAAP Para 1.3.17 of ES Chapter 16 [APP-048] refers to the draft NECAAP. Please explain whether, and which part(s) of, this document is / are Important and Relevant to the decision on this application.</p>
17.8	CCC, SCDC, CCoC	<p>Policy – adopted and emerging Local Plan and SPDs</p> <p>a) Do you agree that the policies listed in ES Chapter 16 are relevant to the determination of this application?</p> <p>b) If not, which policies should be disregarded?</p> <p>c) Have any policies been omitted which should be taken into account? If so, which?</p>
17.9	Applicant	<p>Environmental Statement – clarification Para 4.2.6 of ES Chapter 16 [APP-048] states that <i>Estimated quantities of resource materials required for the construction of the Waterbeach Pipeline are provided in Table 3-1 in 'Materials resources and waste estimates' (Appendix 16.1, App Doc Ref 5.4.16.1). The raw materials required for the construction of the Waterbeach Pipeline are High Performance Polyethylene (HPPE) pipes and aggregates for road surfacing works. The HDPE pipes are considered a manufactured product and are not included in the assessment based on the assumption given in section 2.7.</i></p> <p>a) would the pipes be HPPE or HDPE?</p> <p>b) If the pipes are considered to be a 'manufactured product', is it accurate to refer to them as a 'raw material'?</p>

17.10	Applicant	<p>Environmental Statement – clarification</p> <p>In ES Appendix 16.1 Material Resource Requirements and Waste Estimates [APP-132], and save for the 0.5km covered within the area required for the construction of the proposed WWTP, why is the proposed WWTP referred to in Table 3-2 and Table 3-3 (which relate to the Waterbeach Pipeline)?</p>
17.11	Applicant	<p>Environmental Statement – clarification</p> <p>Para 4.3.7 of ES Chapter 16 [APP-048] states that <i>Use of bio-fertiliser on agricultural land is the most sustainable option and is guided by The Sludge (Use in Agriculture) Regulation (The Sludge (Use in Agriculture) Regulation, 1998)</i>. Should this reference be to The Sludge (Use in Agriculture) Regulations 1989?</p>
17.12	Applicant	<p>Environmental Statement – scope</p> <p>Table 1-3 of ES Chapter 16 [APP-048] summarises some of the advice given to the Applicant during the pre-application stage thus: [Planning] <i>Inspectorate does not agree that the effects of waste generated from demolition activities at both existing sewage works can be scoped out of the assessment at this time. The assessment needs to describe the likely decommissioning works to the extent that they are foreseeable.</i></p> <p>The ExA understands that such information has not been included because it is intended that post-decommissioning work at the existing WWTP would be undertaken by the party or parties who would be redeveloping that site as part of the wider prospective North East Cambridge (NEC) development. The status of the emerging local plan and the NECAAP (which are not yet adopted) and the absence of planning permission for NEC (including for demolition of the existing WWTP) would need to be taken into account when assessing the weight that can be given to the certainty of the existing WWTP being redeveloped, as well as the timing of redevelopment.</p> <ol style="list-style-type: none"> Does the intention to leave structures etc. on the decommissioned sites (at both the existing WWTP and Waterbeach) accord with the EA's requirement to return the site of a regulated facility to a satisfactory state, having regard to the condition of the site before the permit was granted (para 4.4.5 of [APP-048])? What is the EA's requirement? How long does the Applicant expect the decommissioned structures to remain <i>in situ</i> pending redevelopment at both sites? Are there any risks associated with this – whether risks to the environment or other risks such as trespass, arson etc.? How would any such risks be minimised or mitigated so as not to harm the safety and amenities of nearby occupiers or landowners. What would happen if the NEC development or the redevelopment of the decommissioned existing WWTP does not proceed? Are any entities subject to legal obligations to clear the decommissioned site, whether or not in connection with the NEC development? Please provide evidence to support your response.

		<p>f) If yes, what provisions are in place if those entities cease to exist or fail to clear the decommissioned site? Does the responsibility fall back to the Applicant? Please provide evidence to support your response.</p> <p>g) Please also explain the arrangements that are in place for the removal of structures at Waterbeach.</p> <p>h) Bearing in mind the Planning Inspectorate's advice, is the Applicant satisfied that its approach has sufficiently pre-empted any challenge to the Secretary of State's decision in respect of the adequacy of the ES? Please provide a full explanation to support your answer.</p>
17.13	CCC	<p>Environmental Statement – scope</p> <p>Is CCC, as local authority for development at NEC, satisfied that it is appropriate to exclude demolition of the existing WWTP from this DCO application, bearing in mind that any impacts associated with the demolition could have to be taken into account in the determination of a planning application for NEC?</p> <p>What are the Council's views on the site potentially remaining uncleared or undeveloped for a number of years?</p>
17.14	SCDC	<p>Environmental Statement – scope</p> <p>Is SCDC, as local authority for Waterbeach, satisfied that it is appropriate to exclude demolition of the existing Waterbeach facility from this DCO application?</p> <p>What are your views on the site potentially remaining uncleared or undeveloped for a number of years?</p>
17.15	Applicant	<p>Proposed WWTP – use of excavated material</p> <p>CCoC's RR [RR-001] states at 10.1 that <i>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.</i></p> <p>Please explain whether and how CCoC's request can be addressed.</p>
17.16	Applicant	<p>Proposed WWTP – use of excavated material</p> <p>At para 3.2.6 of ES Chapter 16 Appendix 16.1 [APP-132] it is stated that <i>As part of mitigation plans, re-use of all suitable excavated material in the construction of the Proposed Development has been proposed to reduce the requirement to import materials for construction and reducing the need to remove surplus materials (waste generated) from site. This would produce less carbon emission for the transportation of materials on-site and removal of waste for disposal.</i></p>

		<p>At para 4.2.39 it is stated that <i>Non-hazardous excavated soil will be reused on-site for landscaping works. Considering a worst-case scenario, where excavated material (except topsoil) is unacceptable for reuse, it will be managed in accordance with the waste hierarchy. The reduction in the Cambridgeshire's non-hazardous landfill void capacity, given in Table 3-9 and paragraph 3.1.25, would be by 0.4% in the event that the entire estimated 26,241m³ of material did require disposal, the reduction in East of England's non-hazardous landfill void capacity will be 0.11%.</i></p> <p>a) Please explain why the 26,241 m³ of excavated material might be unacceptable for re-use. b) When would the suitability of this material for re-use be known? c) If it is acceptable for re-use, how would it be used? d) In the interests of minimising vehicle journeys and associated carbon emissions, if this material is suitable for re-use how could its re-use on-site or, failing that, on other local developments be ensured? e) If it were used in landscaping works, how would this affect the appearance of the Proposed Development? Would the scheme's parameters change?</p>
17.17	Applicant	<p>Proposed WWTP – operational phase effects In section 4.3 of ES Chapter 16 [APP-048] under the heading 'Operation Phase Proposed WWTP' the following is noted: <i>4.3.14 The application of measures within section 7.9 of the CoCP Part A (Appendix 2.1, App Doc Ref 5.4.2.1) would further mitigate the potential effects associated with waste generation during construction.</i></p> <p>Please explain the construction activities that would be taking place and the measures in CoCP Part A that would be applied during the operational phase.</p>
17.18	Applicant, CCC, SCDC	<p>Proposed WWTP – use of resources It has been suggested in some RRs (such as [RR-167]) that there is no operational reason to replace the existing WWTP and that the plant / equipment is still fit for purpose. On the basis that there is no operational need to replace the existing WWTP, should the use of resources and the generation of waste (as explained in ES Chapter 16 [APP-048]) to build the proposed WWTP and associated works be given positive, neutral or negative weight in the planning balance?</p>
18. Noise and vibration		
18.1	Applicant	<p>Assessment Do the impacts of operational traffic contained within ES Chapter 17 Noise and Vibration [AS-036] consider night time impacts?</p>
18.2	Applicant	<p>Assessment Please justify why Grange Farm, Clayhithe Road was not included as a sensitive receptor within ES Chapter 17 [AS-036] for which noise and vibration monitoring and modelling was undertaken, given it appears to be a residential property adjacent to a construction access?</p>

		<p>Please justify why the property highlighted below in yellow (taken from Sheet 9 of the General Arrangement Plans [AS-149]) was not included as a sensitive receptor within ES Chapter 17 [AS-036] for which noise and vibration monitoring and modelling was undertaken, given it appears to be a residential property in relatively close proximity to the Proposed Development:</p> 
18.3	Applicant	<p>Assessment Why were receptors around Cody Road / Abbey Place (Waterbeach) scoped out of assessment from noise and vibration impacts?</p>
18.4	Applicant	<p>Response to SCDC's RR Please provide a response to para 76 and 77 of SCDC's RR [RR-004].</p>
18.5	Applicant	<p>NPSWW Para 4.9.8 of NPSWW states that the Proposed Development should demonstrate good design through selection of the quietest cost-effective plant available. Whilst it is noted that NPSWW accordance table [AS-130] states that the use of low noise generating plant and equipment has been selected, please confirm whether the equipment selected is the quietest cost-effective plant available? If not, please justify your response.</p>
18.6	Applicant	<p>Assessment Residential properties have been categorised as having Medium Sensitivity - Moderate tolerance to change and of Moderate quality/importance within the Noise Assessment within ES Chapter 17 [AS-036]. CCC state that residential properties are usually considered highly sensitive noise receptors with a low tolerance to change, and that the noise assessment therefore is likely to underestimate the overall significance of effects.</p>

		<p>a) It is stated within ES Chapter 17 [AS-036] that the <i>sensitivity of different receptors has been reviewed in accordance with prevailing standards and guidance accounting for criteria such as their ability to absorb change, their importance and value</i>. Please provide further information on the aforementioned prevailing standards and guidance and justify why residential properties have been categorised as medium sensitivity, with reference to CCC's comments.</p> <p>b) Would residential properties have a lesser degree of tolerance at night and does this affect their classification of sensitivity – why / why not?</p> <p>c) Please justify why listed buildings are listed as having medium sensitivity and therefore moderate quality given the significance of these heritage assets and importance to be attributed to such buildings within national planning policy and NPSWW.</p>
18.7	Applicant	<p>Guidance – BS 5228-1 Para 2.3.2 of ES Chapter 17 [AS-036] states that in accordance with BS 5228-1 guidance, the study area for airborne noise during the construction phase includes an area 300m from any construction works. Please signpost to where within the guidance (i.e. page and para number) this is stated.</p>
18.8	Applicant	<p>Assessment Para 2.3.3 of ES Chapter 17 [AS-036] states that <i>Groundborne vibration typically has the potential to affect the closest receptors during activities that involve high vibratory sources (for example piling, vibratory compaction or tunnelling). Vibration effects are assessed for receptors within 100m of these relevant activities. This distance is extended, however, for specific circumstances where significant adverse effects appear likely at larger distances</i>. Please detail how these parameters have been determined and if there is any guidance which supports this.</p>
18.9	Applicant	<p>Assessment and mitigation CCoC raise concerns [RR-001] that some assessments can't be adequately concluded as some of the fixed plant locations, such as the pumping station, have yet to be determined and confirmed. They suggest that further assessments would be needed to ensure there are no impacts on human health from noise and vibration when the locations have been confirmed. Do you agree with CCoC and how do you propose to ensure that this matter is satisfactorily addressed?</p>
18.10	Applicant	<p>Assessment Table 2-5 of ES Chapter 17 [AS-036] sets out the impact magnitude criteria for operational noise. Please justify your classification of minor impacts being between '0dB and less than +10dB', particularly when noting that +5dB is likely to have an adverse impact in accordance with BS:4142.</p>
18.11	Applicant	<p>Effects ES Chapter 17 [AS-036] does not refer to the noise and vibration impacts from decommissioning in full (e.g. Table 2-9: Noise and vibration study areas and Construction and Operation and Maintenance (para 2.4.1 – 2.4.6)). It's therefore unclear to the ExA how decommissioning has been considered within the initial consideration of significance of impacts.</p>
18.12	Applicant	<p>Working hours</p>

		<p>The CoCP Part A [APP-068] proposes that construction hours should have an additional hour at the start and end of the working day for mobilisation and maintenance activities. This includes the arrival and departure of the workforce (peak would be approx. 375 staff across all areas).</p> <p>a) Whilst it is stated that contractors would be considerate towards neighbours with no raised voices, how would this be controlled or enforced?</p> <p>b) The mobilisation period also includes the refuelling of vehicles, plant and machinery. If, for example, this equipment needs to be moved to be refuelled, this could cause disturbance. How has this (or similar activities during these additional hours) been considered within the ES?</p> <p>c) The wording of the CoCP Part A does not suggest that the list of mobilisation activities is exhaustive - please confirm if this is exhaustive?</p> <p>d) Provide justification for the extension of the proposed working hours to allow for mobilisation which could potentially cause significant noise disturbance, including unknown activities which could cause disturbance. Moreover, please justify why this has not been considered within the ES regarding noise and vibration.</p>
18.13	Applicant	<p>Working hours</p> <p>Within the CoCP Part A [APP-068], the proposed construction working hours states that for very special circumstances, extended working hours would be required. It is not clear whether the three activities listed under the relevant section of Table 5.1 are exhaustive, please clarify. Please also provide justification for why these activities cannot be carried out under the normal core hours proposed.</p>
18.14	Network Rail Infrastructure Limited, National Highways	<p>Working hours</p> <p>Within the CoCP Part A [APP-068], the proposed construction working hours states that for very special circumstances, extended working hours would be required. Under table 5.1 regarding this matter, the Applicant states that <i>Network Rail and/or National Highways are expected to stipulate a requirement for 24 hour working in relation to works under or adjacent to their asset</i>. Please confirm whether you intend to stipulate a requirement for 24 hour working as suggested by the Applicant and provide justification if so.</p>
18.15	Applicant	<p>Working hours</p> <p>Within the CoCP Part A [APP-068], the proposed construction working hours states that continuous working hours would be required for specific construction activities. It is not clear whether the four activities listed under the relevant section of Table 5.1 are exhaustive because ES Chapter 17 [AS-036] refers to other specific activities e.g. the operations at shafts 3 and 5 would be 24hr working for 2 years - please clarify. Does the CoCP Part A need updating? Please also provide justification for why these activities cannot be carried out under the normal core hours proposed.</p>
18.16	Applicant	<p>Working hours</p>

		Within the CoCP Part A [APP-068], the proposed construction working hours states that there may be over running work and that <i>whilst every effort will be made to ensure that this does not happen there may be some occasions when a construction activity over runs and cannot be paused until it has been completed and/or made safe</i> . It is noted that this is not referred to within ES Chapter 17, but would be secured as part of the dDCO through R8. Please therefore clarify how this has been assessed within the ES. Furthermore, please justify why this should be included within the CoCP at all, given that construction works should be carefully planned at all times. Please provide any precedents for where this has been included in other DCO applications.
18.17	CCoC, CCC, SCDC	Working hours Do you consider the proposed construction working hours within the CoCP Part A [APP-068] (Table 5.1) to be acceptable in terms of the impacts which may be generated in relation to noise and vibration to nearby sensitive receptors?
18.18	Applicant	Assessment Para 2.9.6 of ES Chapter 17 [AS-036] regarding construction states that the <i>mobilisation activities are assumed to not include significant sources of noise or vibration</i> . Assessment of noise and vibration impacts therefore does not consider mobilisation periods. Chapter 17 does go on to assess the impacts of construction traffic. The ExA is not clear on whether the impacts of construction traffic include the impacts of the workforce arriving and departing the site - please clarify. If it does not, please demonstrate how the arrival and departure of the workforce would not have a significant impact on sensitive receptors.
18.19	Applicant	Assessment Para 2.9.17 of ES Chapter 17 [AS-036] regarding operational noise impacts states that testing of emergency power generators would occur weekly, please justify why have the noise impacts been scoped out of the assessment on noise and vibration on sensitive receptors, given that the flare stack has been scoped-in to the assessment on a worst-case scenario basis and appears that it would be used less frequently? How long does testing last, and is it likely to impact sensitive receptors? What are the noise and vibration assumptions for this equipment?
18.20	Applicant	Assessment Why did the noise surveys include a combination of unattended measurements (measuring noise conditions continuously over a period of approximately one week – 5 locations) and attended measurements (completed during the daytime only – 6 locations) – why weren't unattended measurements used for all measurements? Does a lack of night-time baseline data for the attended measurements ensure reliable survey results, particularly noting that more surveys were attended than unattended?
18.21	CCoC, CCC, SCDC.	Assessment In various instances within ES Chapter 17 [AS-036], where there are limitations of available existing data, the Applicant has applied professional judgement (e.g. para 4.2.8). Do you find these conclusions sufficiently justified and acceptable?
18.22	Applicant	Mitigation

		ES Chapter 17 states [AS-036] 4.2.61 <i>It is required that building condition surveys are undertaken prior to construction works at any sensitive buildings, including historic or listed buildings that are located near works where there is potential risk vibration would exceed SOAEL (1.0mm/s PPV). This requirement is included within the CoCP Part A. Please direct the ExA to where in the CoCP Part A this is secured.</i>
18.23	Applicant	Assessment ES Chapter 17 [AS-036] identifies baseline noise data and predicated noise levels at various receptor sites. At receptors RC2, RC5, RC9, RC17, RC22 and RC27 the predicted noise levels exceed the night-time SOAEL between 11dB and 18dB (and are also above the ambient level by up to 27dB). Please justify why you consider these effects to be minor or moderate adverse, rather than major adverse, with reference to the criteria set out in Table 2-5 and to the definition of the significant observed adverse effect level (SOAEL).
18.24	Applicant	Continuous construction activities Please set out (or signpost) a list of construction activities which are continuous and would require continuous construction work through the night (such as dewatering of shafts, tunnelling activities at drive shafts, and large concrete pours within the area of land). Please detail the predicted / likely timescales for these works.
18.25	Applicant	Mitigation ES Chapter 17 [AS-036] states in regard to assessing the effects of construction noise on nearby receptors on a number of occasions that <i>due to the nature of these activities the enabling works would only take place within normal construction hours and are unlikely to occur during these periods unless under exceptional circumstances</i> (e.g. para 4.2.21, 4.2.25, 4.2.30, 4.2.31 etc). What controls could be put in place to ensure that enabling works would only take place within normal construction hours, particularly noting the proposed mobilisation hour either side of the core working hours?
18.26	Applicant	Assessment and mitigation Where some moderate adverse effects have been identified in relation to noise impacts from construction work within ES Chapter 17 [AS-036], it is concluded that the significance of the effect is reduced because the works occur over a large area and impacts would reduce over the construction programme (e.g. para 4.2.39, 4.2.92, 4.2.95, etc). Please provided further justification regarding how this reduces the impacts. It is also concluded that the moderate adverse impact is unlikely to occur for an extended duration (i.e. not more than 10 in 15 consecutive days or, not more than 40 days in a 6 month period), therefore the significance of the effect is reduced. How would the length of the moderate adverse impacts be controlled to ensure a reduction in the significance of effect as proposed?
18.27	Applicant	Assessment Para 4.4.14 of ES Chapter 17 [AS-036] states that <i>results during the night-time period indicate exceedances of LOAEL (highlighted blue) due to decommissioning activities at RC16 and RC17. None of these impacts increase the existing ambient noise level by +5dB</i> . However, table 4-29 indicates that RC16 and RC17 would experience an increase of 11dB and 8dB respectively from the ambient baseline. Please correct the information accordingly. Does this affect the conclusion that the impacts would be minor adverse?

18.28	Applicant	Mitigation Para 4.4.17 of ES Chapter 17 [AS-036] states that decommissioning works in this area would not be undertaken between 23:00 and 06:00. Please identify where this is controlled within the CoCP.
18.29	Applicant	Additional information Para 4.6.6 of ES Chapter 17 [AS-036] describes the in-combination effects of construction and that the most sensitive receptor location to combined impacts is Red House Close due to the horizontal directional drilling and Shaft 4 construction activities. It is stated that this would result in new exceedances of LOAEL during shoulder periods, evenings and weekends, however, it would not exceed SOAEL and would not result in new significant adverse effects. Please provide the predicted noise impacts in tabular form for cross referencing.
18.30	CCC, CCoC, SCDC	Further assessment Do you consider the proposed noise and vibration management plan, which would be required by R9 of the dDCO [AS-139], should include further noise assessments of sensitive receptors in accordance with BS4142, and/or should include real time monitoring and management of noise in order to suitably mitigate effects of the proposed construction works?
18.31	CCC, CCoC, SCDC	Review of additional information submitted by the Applicant Please review and comment on the acceptability of the draft Construction Environmental Management Plan [AS-057] in relation to noise and vibration.
19. Odour		
19.1	Applicant	Drafting error Table 1-2 of ES Chapter 18 Odour [APP-050] includes an incomplete link to another document - Mitigation measures have been presented <i>in Error! Reference source not found.</i> Please update the document accordingly.
19.2	Applicant	Assessment Please justify why Poplar Hall was not identified as a specific odour receptor for the purposes of ES Chapter 18 [APP-050] and why the odour impacts of the Proposed Development were not assessed on this receptor?
19.3	Applicant	Drafting error and clarification Figure 4-1 of ES Chapter 18 [APP-050] and Figure 18.1 of Book of Figures – Odour [APP-065] do not correlate entirely (e.g. the odour concentration line of 1.5ouE/m ³ incorporates receptor no. 2 on Figure 18.1, but excludes receptor no. 2 on Figure 4-1). Please check the figures and update them to ensure that they are both correct. Do any updates affect any of the findings of the ES? Do the aforementioned figures show the impacts of standard operational impacts and abnormal operating conditions?
19.4	Applicant	Drafting error

		Para 4.3.17 of ES Chapter 18 [APP-050] states that <i>the largest predicted odour concentration for the one-hour 98th percentile at existing high sensitivity receptors is 0.5ouE/m3 at Receptor 4, 'Biggin Abbey' a residential property to the north west of the proposed WWTP, and is classed as a Negligible impact.</i> However, according to Table 2-4 of ES Chapter 18 Odour, an odour exposure level of 0.5ouE/m3 would have a magnitude impact of 'very small'. Please update the effects accordingly.
19.5	EA, CCC, CCoC, SCDC.	Assessment Do you consider one odour emissions rate survey during July 2019 and three sniff surveys during April and May 2022 to be sufficient for the baseline odour assessment?
19.6	Applicant	Assessment Please explain why only one odour emissions rate survey during July 2019 and only three dates within 2022 were used for the baseline odour assessment, when five years of wind data was used – can this therefore be considered as representative? Regarding the sniff surveys, how can these be considered as worst case scenario data to inform the baseline when they were not carried out during the summer months when it is accepted that odour can be worsened due to increased temperatures?
19.7	Applicant, EA, CCC, CCoC, SCDC.	Data ES Chapter 18 [APP-050] states in the summary that <i>As the proposed waste water treatment plant (WWTP) does not currently exist, the quantitative odour predictions applied estimated emission rates from measurements taken at the existing Cambridge WWTP from a July 2019 odour survey during the summer months.</i> Are there any design differences between the existing Cambridge treatment works and the proposed treatment works that might make the use of this survey data unrepresentative of the conditions at the proposed new treatment works?
19.8	Applicant	Assessment Please justify why odour impacts of deliveries of waste water and sludge by vehicles, and the operation of the treated effluent discharge outfall to the River Cam were assessed qualitatively rather than quantitatively using survey data from the existing Cambridge treatments works?
19.9	Applicant	Sludge deliveries What are the anticipated odour levels from the dried sludge cake leaving the treatment works? What is the anticipated road route of the vehicles transporting the dried sludge cake? Is odour from the sludge cake likely to be noticeable at sensitive receptors when being transported from the treatment plant?
19.10	Applicant	Licences and permits Please clarify if the Preliminary OMP mitigation measures for any elements of the proposal would fall outside the Industrial Emissions Directive (IED) permit application (e.g. waste water transfer tunnel vent stack, carbon filter etc maintenance) and if so, what they are? If they fall outside of the IED permit, how are they controlled through the dDCO?
19.11	EA	Permits

		Do you agree with the Applicant that <i>climate change is not expected to alter future baseline odour emissions. Both existing odour sources and the Proposed Development would be expected to comply with the requirements of their environmental permits and mitigate any increases in odour emissions associated with changes in climate</i> [para 2.2.23 ES Chapter 18 [APP-050]. Do you consider that the environmental permitting process could acceptably control an increase in odour emissions associated with climate change?
19.12	EA	Permits The Applicant confirms in ES Chapter 18 [APP-050] that the operation of the Proposed Development would require an environmental permit, which would require the operation to have a written Environmental Management System, which includes an OMP. Do you consider the submitted Preliminary OMP to be acceptable and do you have any reason to consider that the environmental permit would not be issued, based on the information available?
19.13	EA, CCC, CCoC, SCDC	Assessment The IAQM 2018 guidance on assessing odour impacts for planning, in Appendix A1.2.2 states that a qualitative risk-based approach towards assessment is appropriate under certain circumstances. Other than the odour impacts for the operation of the proposed WWTP, the assessment of odour impacts is determined in a qualitative approach. Do you accept the Applicant's approach towards assessment of odour impacts in this regard?
19.14	Applicant	Mitigation Para 4.2.15 of ES Chapter 18 [APP-050] sets out what is contained within CoCP Part B to mitigate impacts of odour from testing and commissioning. However, this is not the exact wording which is contained on p15 of CoCP Part B [APP-069] (which is what the document implies is included). Please update CoCP Part B accordingly as ES Chapter 18 is more specifically worded.
19.15	CCC, CCoC, SCDC	Mitigation Within ES Chapter 18 [APP-050], the magnitude of effects from odour release from the connection of Waterbeach pipeline to the new pumping station, breaking open the existing sewer and connection of the Waterbeach pipeline to the existing sewer are described as small. This is in part because they would occur intermittently and for no more than 4 weeks. In your view, should these works to be limited to no more than 4 weeks within the CoCP Part B [AS-161] to ensure that the magnitude of the effect would remain small as proposed by the Applicant?
19.16	Applicant	Effects Please provide more justification for the conclusion that the significance of the likely odour effect from abnormal operations, accidents or emergencies would be Negligible at worst in ES Chapter 18 [APP-050] - given that at worst, the source odour is classified as Medium, with a Highly Effective pathway, with an odour exposure risk of Medium, imposed on High sensitivity receptors - please provide additional justification for the conclusion of the significance of effect.
19.17	Applicant	Effects

		Please provide more justification for the conclusion that the significance of the likely odour effect from deliveries of waste water and sludge by vehicle would be Negligible at worst in ES Chapter 18 [APP-050] - given that at worst, the source odour is classified as Small, with a Highly Effective pathway, with an odour exposure of Low, imposed on High sensitivity receptors - please provide additional justification for the conclusion of the significance of effect.
19.18	Applicant	<p>Effects</p> <p>Please confirm the likely frequency of utilisation of the interception shaft at the waste water transfer tunnel within the existing Cambridge WWTP. Please provide more justification for the conclusion that the significance of the likely odour effect from the use of the vent stack at the existing Cambridge WWTP would be Negligible at worst in ES Chapter 18 [APP-050] - given that at worst, the source odour is classified as Small, with a Highly Effective pathway, with an odour exposure of Low, imposed on High sensitivity receptors - please provide additional justification for the conclusion of the significance of effect.</p>
19.19	Applicant	<p>Decommissioning</p> <p>Regarding decommissioning, ES Chapter 18 [APP-050] states that tanks would be drained through the existing treatment process, but that any residual sludge within the primary settlement tanks would be removed via suction pump and either taken offsite for treatment or treated onsite via a process such as a quick lime dosing plant. It is noted that the dosing with lime would be odorous, and the sludge would be stored onsite.</p> <ol style="list-style-type: none"> Please confirm what happens to the sludge once treated with lime – e.g. is it taken offsite? Why does the sludge need to be treated onsite with lime creating an odorous process if it is to be taken offsite in any event – could this odorous process occur offsite away from sensitive receptors? How long are odorous processes likely to take regarding this matter? Please justify the suggested location of the ‘dosing facility permanent compound’ as shown on Sheet 1 of the General Arrangement Plans [AS-149], which would be nearby to sensitive receptors. Should there be an area identified on the works plans where this treatment cannot occur to protect sensitive receptors? Would the dosing facility be removed as part of the decommissioning activities? If so, please identify how this has been considered as part of the ES. If it is not removed, why not?
19.20	Applicant, EA	<p>NPSWW</p> <p>In accordance with para 4.3.9 of NPSWW, do you consider that all potential emergencies have been considered as part of the odour impact assessment (e.g. has the loss of the sludge disposal route been fully considered)?</p>
19.21	Applicant	<p>Additional information – vent shafts</p> <p>ES Chapter 18 [APP-050] states that the odour impacts of vent shafts have not been modelled, owing to the variability of operation and owing to the embedded measures to minimise odour. Please can more information be provided on the frequency, duration and potential odour impacts from use. It is understood that vents of this nature are commonplace, so could quantitative information be provided on this matter regarding the odour impacts?</p>
19.22	Applicant, EA	Localised odours

		ES Chapter 18 [APP-050] states that <i>some localised areas close to the existing Cambridge WWTP currently experience intermittent odours from its operation, likely due to the age of the plant and historic technology and processes</i> . However, given that the proposed WWTP would operate under the same permitting regime, what assurances can the Applicant give that localised odours would not occur? When the scheme is taken comprehensively, would the Proposed Development result in an overall betterment in terms of odour impacts on sensitive receptors in the local area, and if so, to what significance would this betterment be?
19.23	Applicant	Assessment There does not appear to have been assessment of the impact of storm surge overflow and combined sewer overflows from the outfall into the River Cam and the associated odour impacts. Please direct the ExA to where this is contained within the ES or provide further information on this matter.
19.24	Applicant	Assessment Regarding the sewer air valves for the Waterbeach transfer pipeline, please detail how this has been assessed on a worst case scenario – i.e. have locations nearest the most sensitive receptors been considered? What is the likely frequency and duration of use of the valves?
19.25	Applicant	Assessment Please provide a response to comments from IPs (e.g. [RR-035]) that the existing WWTP creates odours from time to time, at locations outside the modelled zone of detection. Is it likely to be the case that the proposed WWTP would create odour impacts outside those which have been modelled / predicted?
19.26	Applicant	Climate change Regarding the impacts of climate change, please confirm what is the maximum temperature the proposed WWTP has been designed to work within? What type of controls through the environmental permits would be able to mitigate odour impacts as a result of increased temperatures from climate change?
20. Traffic and transport		
20.1	Applicant	Transport Assessment (TA) Please thoroughly check the TA [AS-108] for errors, for example see the paragraph numbering on page 125/554 and missing paragraph numbers elsewhere such as on page 134/554. This will enable the ExA to include clear references in its recommendation report.
20.2	Applicant	TA The 'Version History' says that a new Appendix L has been included in Version 3 of the TA [AS-108] and para 5.1.2 of the TA states: <i>Appendix A, Figure A.37 shows the locations and survey types. Appendix L: ATC Speed / Count Surveys contains the detailed survey results</i> . However, no survey results have been provided in Appendix L, only an undated drawing showing proposed ATC speed count survey locations. Please address this.
20.3	Applicant	Road Safety Audit (RSA)

		<p>In response to the ExA's request in the 10 August 2023 PD, the Applicant's letter dated 29 September 2023 states <i>The Road Safety Audit (RSA) has been produced which covers the permanent site access and A14 overbridge changes</i>. However, the RSA that was provided on 29 September 2023 [AS-112] is dated 25 November 2022 and makes no reference to the A14 overbridge changes.</p> <p>Please submit the information that was requested.</p>
20.4	Applicant, CCoC	<p>TA</p> <p>In CCoC's note at page 283 of 554 of the TA [AS-108] it is stated by CCoC that <i>With regards to the use of survey data this has been discussed at our meeting dated 13th April 2021 in detail and please refer to these meeting notes. In terms of the new surveys, it is agreed that these will be taken at the relevant access points as necessary. These surveys should be undertaken as late as possible, and for further advice on this please contact CCC.</i></p> <p>a) Please provide a copy of the notes of the 13 April 2021 meeting.</p> <p>b) The scoping exercise at Appendix B of the TA appears to relate primarily to the Proposed WWTP. Is CCoC content with the scope of work carried out in relation to construction phase effects at other locations, e.g. in Waterbeach and along the A10?</p>
20.5	Applicant	<p>Environmental Statement</p> <p>New IEMA Guidance about the Environmental Assessment of Traffic and Movement was published in July 2023. Does this have any implications for the methodology or conclusions of ES Chapter 19 [AS-038] which was based on the IEMA's 1993 guidance, or does it require any changes to be made to any proposed mitigation?</p>
20.6	Applicant	<p>Environmental Statement – clarification</p> <p>On page 157 of ES Chapter 19 [AS-038] under the heading 'Operation and maintenance of transfer tunnel' the text (para 4.3.21 and 4.3.22) is identical to the text at 4.3.19 and 4.3.20 which relates to 'Operation and maintenance of the outfall / ditch habitat'. Please clarify and indicate where 'Operation and maintenance of transfer tunnel' is discussed.</p>
20.7	Applicant	<p>Environmental Statement Chapter 19 Appendix 19.1 Baseline – traffic surveys</p> <p>Parts of ES Appendix 19.1 [APP-141] are illegible, e.g. PDF page 380/405 Please rectify the issues with this document, add page numbering, and re-issue. When re-issuing documents please also provide a list of changes / updates that have been made.</p>
20.8	Applicant	<p>Environmental Statement – clarification Regarding PRow diversions</p> <p>ES Chapter 11: Community [AS-028] states at section 1.2 (after para 4.2.35 on page 58 of Revision 2 dated September 2023) that: <i>The provision of safety gates allowing users to cross the construction working area would reduce the length of the diversion to 770m for users of PRow 85/6.</i></p>

		<p>On page 44 of ES Chapter 19 [AS-038] it is stated that <i>In total, the diversion on PRoW 85/6 results in a 770m? added journey length</i>. At para 4.2.175 of ES Chapter 19 it is noted that: <i>users of the 85/6 would need to travel an additional 780m to return to back to the 85/6 at Baits Bite Lock</i>. In addition, the figures for 85/8 on Table 4-54 differ from figures in Table 4-53 of ES Chapter 19.</p> <p>Please ensure that all figures are consistent throughout the ES. If there is a reason why figures differ (e.g. between Table 4-53 and Table 4-54 or between chapters) please explain the reason for this.</p>
20.9	Applicant	<p>Mitigation plans</p> <p>Para 3.8.23 of ES Chapter 2 [APP-034] says that <i>All vehicle and pedestrian movements will be managed via a Construction Transport Management Plan</i>. Para 3.10.1 of ES Chapter 2 refers to a <i>green travel plan</i>. Para 4.5.20 of ES Chapter 19 [AS-038] states: <i>For this major significant effect on driver delay to be made not significant, an Operational Traffic Management Plan would be necessary in order to clearly manage operational traffic. Measures secured through the Operational Traffic Management Plan (OLTP) / Servicing and Delivery Plan would also form part of further mitigation</i>. Para 2.7.3 of the Non-Technical Summary [APP-032] refers to an 'Operational Traffic Management Scheme' and para 3.2.8 of ES Chapter 2 refers to an 'Operational Logistics Plan'.</p> <p>The ExA cannot locate a number of these documents or references to them in the dDCO:</p> <ul style="list-style-type: none"> ▪ Construction Transport Management Plan (not found in application documents or dDCO) ▪ Green Travel Plan (not found in application documents or dDCO) ▪ Servicing and Delivery Plan (not found in application documents or dDCO) ▪ Operational Traffic Management Plan (not found in application documents or dDCO) ▪ Operational Traffic Management Scheme (not found in application documents or dDCO) ▪ Operational Logistics Plan (not found in application documents or dDCO) <p>Please provide an accurate and definitive schedule of the mitigation plans which are referred to in the ES and in the dDCO, including any other management plans not listed above. Please set out:</p> <ol style="list-style-type: none"> a) The exact name of the document (as it appears on the document); b) Where this is referred to in / secured by the dDCO (Requirement or a Certified Document); c) The Examination Library reference; and d) Any alternative names that have been used in the ES for each document.
20.10	Applicant	<p>Construction phase – clarification</p> <p>ES Chapter 19 [AS-038] makes reference at para 4.2.244 to: <i>a temporary parking restriction on Bannold Road junction with Denny End Road / Car Dyke Lane</i>. Please indicate on a map where this is located.</p>
20.11	Applicant	Policy – national

		<p>Section 3.1 of the TA [AS-108] refers to the over-arching aims of NPSWW. However, it does not refer to NPSWW section 4.13 which relates to 'Traffic and transport impacts'. Please provide a brief addendum to the TA which:</p> <ul style="list-style-type: none"> a) signposts where each relevant consideration in NPSWW section 4.13 has been dealt with in the TA; b) where considerations in NPSWW section 4.13 have not been dealt with, either deals with them in the addendum or explains why you do not consider there to be a need to deal with them; and c) frames the TA's conclusions in terms of compliance with NPSWW section 4.13, setting out the author's opinion on the acceptability (or other otherwise) of identified impacts.
20.12	Applicant, CCC	<p>Policy – local</p> <p>Para 1.3.4 of ES Chapter 19 [AS-038] says that Policy SS/4 (Cambridge Northern Fringe) of the South Cambridgeshire District Council Local Plan 2018 is relevant. It also indicates that the emerging North East Cambridge Area Action Plan 2020 and policies 16, 17, 18, 22 of the North East Cambridge Action Plan 2021 are relevant. Please explain the relevance of these to the Examination of the application for the proposed WWTP.</p>
20.13	Applicant, SCDC, CCoC	<p>Policy – local</p> <p>Is the Proposed Development a development with 'significant transport implications' according to Policy TI/2: Planning for Sustainable Travel of the South Cambridgeshire Local Plan 2018?</p>
20.14	CCC, SCDC, CCoC	<p>Policy – local</p> <ul style="list-style-type: none"> a) Is the Applicant's summary of applicable adopted and emerging local policy complete? b) Are there any other policies that should be taken into account? c) Should any of the policies noted by the Applicant be disregarded?
20.15	National Highways CCoC	<p>Guidance – WebTAG</p> <p>With reference to sections 3.4 and 3.5 of ES Chapter 19 [AS-038], are you satisfied that the Applicant has appropriately and satisfactorily followed the WebTAG guidance? If not, please set out what needs to be done to address this situation.</p>
20.16	CCoC	<p>Guidance – Cambridgeshire County Council's Transport Assessment Guidance</p> <p>With reference to section 3.15 of ES Chapter 19 [AS-038], are you satisfied that the Applicant has appropriately and satisfactorily followed CCoC's guidance? If not, please set out what needs to be done to address this situation.</p>
20.17	CCC, SCDC, CCoC	<p>Strategy documents – relevance to decision</p> <p>ES Chapter 19 [AS-038] refers to the following documents:</p> <ul style="list-style-type: none"> ▪ 3.7 Cambridgeshire Long Term Transport Strategy ▪ 3.8 Transport Strategy for Cambridge City and South Cambridgeshire ▪ 3.9 Cambridgeshire County Council's Transport Investment Plan ▪ 3.10 Greater Cambridge Greater Peterborough Strategic Economic Plan ▪ 3.11 Cambridgeshire and Peterborough Combined Authority Local Transport Plan ▪ 3.12 Cambridgeshire Local Transport Plan ▪ 3.16 Greater Cambridge City Deal

		<ul style="list-style-type: none"> 3.17 Cambridge City Access <p>It appears to the ExA that some of the documents / provisions noted by the Applicant relate to strategy rather than decision-making considerations. Which, if any, of the above documents do you consider to be Important and Relevant to the decision on this application? Please specify which part(s) of each document you consider to be Important and Relevant.</p>
20.18	Applicant	<p>Safety – Operation of Cambridge City Airport</p> <p>Please provide comments on the requests of Marshalls [RR-030] for:</p> <ul style="list-style-type: none"> a) Involvement in the preparation of a Construction Environmental Management Plan; b) a Bird Hazard Management Plan; and c) if there is a need for additional aeronautical studies to be undertaken, the cost of these studies to be covered by the Applicant.
20.19	Applicant, National Highways, CCoC	<p>Safety – Abnormal Indivisible Loads (AIL)</p> <p>Para 3.8.26 of ES Chapter 2 [APP-034] says that <i>It is anticipated that abnormal loads will be required for the access platform, process tank, and pipe bridges, and that the delivery of these would be via the main access point. Abnormal load licenses may also be required for pre-assembled kiosks.</i> RRs [RR-005 and RR-012] raise a concern relating to AIL movements.</p> <p>NPSWW states at para 4.13.2 that the consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development. NPSWW also notes at 4.13.1 that disturbance caused by traffic and abnormal loads generated during the construction phase would depend on the scale and type of the proposal. In that context the ExA considers it important for information on AILs to be provided, including to identify whether there are any barriers to the physical deliverability of the Proposed Development or whether any changes would be needed to the proposed construction traffic routes.</p> <p>Could the Applicant please set out:</p> <ul style="list-style-type: none"> a) the number of AILs that would be expected at the Proposed Development; b) when these are expected to occur; c) how these would be transported to the final location(s); d) any route testing that has already been undertaken; e) any specific issues which have not yet been resolved such as areas of the network that could not be traversed with an AIL (for example bridges with weight or height restrictions, narrow roads, or the existence of a live overhead line at railway level crossings); and f) its response to the EEAST's suggestion that Requirements or a DCO Obligation would be required in relation to AIL.

		<p>Could National Highways and CCoC please explain:</p> <p>g) whether there are any network restrictions that the Applicant should be aware of / which could pose an issue for the transportation of AIL to the work sites.</p>
20.20	Applicant, Network Rail Infrastructure Limited	<p>Safety – railway level crossings</p> <p>Would all vehicles involved in implementation of the Proposed Development (including cranes and AIL) be capable of traversing level crossings without damaging the tracks, overhead lines and any safety equipment? Would the ‘hump’ at the Fen Road level crossing cause any issues for long vehicles / low loaders?</p>
20.21	Applicant	<p>Evidence for choice of vehicular access</p> <p>On page 20 of Consultation Appendix Phase Two Consultation Summary Report dated December 2021 [APP-183] it is stated that <i>in addition to a traffic assessment, we have undertaken a detailed, wider appraisal assessing the options against 22 different criteria</i> and that <i>However, when considering our analysis alongside National Highways’ advice that a new junction to allow access directly from the A14 would only be acceptable to them where there were no viable alternatives, Anglian Water did not consider that a need for Option 3 could be evidenced.</i> At para 5.1.1 and 5.1.3 of the TA [AS-108] it is noted that traffic surveys were undertaken in December 2021 and May 2022, apparently after the decision was made in relation to the site access.</p> <p>a) Were any traffic surveys undertaken before December 2021 to support the choice of site access?</p> <p>b) Please provide a copy of the ‘traffic assessment’ and ‘detailed wider appraisal’ that informed the choice of access.</p>
20.22	Applicant	<p>Choice of vehicular access</p> <p>On page 38 of Phase Three (Statutory Phase Two) Section 47 Community Consultation Materials [APP-185] it is stated that <i>After consultation with National Highways and Cambridgeshire County Council as the relevant highways authorities, and feedback from the local community and stakeholders as part of our phase two consultation last year, we selected a safe and sustainable permanent access for the project from Junction 34 of the A14.</i> On PDF page 545/554 of the TA [AS-108] it is stated that: <i>Option 3 has not been selected on account of technical issues around creating a new junction off the A14 based on feedback from National Highways.</i></p> <p>a) Please provide copies of National Highways’ and CCoC’s response to the consultation on the site access.</p> <p>b) Please outline the evidence that was presented to them to inform their decisions.</p> <p>c) Please explain the technical issues relating to the creation of a new junction off the A14.</p>
20.23	Applicant, National Highways, CCoC	<p>Choice of vehicular access</p> <p>Four road access options (1a, 1b, 2 and 3) are presented in ES Chapter 3 [AS-018]. While Option 1b has been pursued, Option 3 (direct access from the A14) was the <i>overwhelming preference</i> amongst local people during consultation (page 23 of Applicant Regard to Section 47 Consultation Responses [APP-166]), the preference of SCDC (page 126 of [APP-167]) and is noted in a number of RRs.</p>

		<p>The ES states 6.1.7 <i>Option 3, shown in Figure 6.4, would involve constructing a new junction on the north side of the A14 only, between the current junctions 34 and 35. A new road would be constructed from this junction to the facility.</i></p> <p>6.1.10 <i>Option 1 generally out-performed options 2 and 3, providing a lower cost option which was quicker to deliver while reducing land take and minimising impacts on visual amenity and green belt. All three options were capable of being delivered without adversely affecting road safety or the capacity of the strategic road network.</i></p> <p>6.1.11 <i>While Option 3 performed best in respect of impacts on the local road network and local amenity it was considered that these matters could be appropriately managed through a construction traffic management scheme.</i></p> <p>a) Please provide the approximate costings of the four options which informed these conclusions.</p> <p>b) Would there need to be peak hour movement restrictions with Option 3, whether during the construction phase or the operational phase of development?</p> <p>c) To National Highways only: What is your position on Option 3, including in a situation where other options were shown to have unacceptable highways impacts?</p>
20.24	Applicant	<p>J34 – disruption during construction</p> <p>On PDF Page 23/32 of Consultation Appendix Phase Two part b [APP-182] it is stated that: <i>Option 1B potentially causes disruption or closure to the existing junction during construction of the new access, and requires larger volumes of material than Option 1A.</i> Please describe the nature and expected duration of any disruption and / or closures.</p>
20.25	Applicant	<p>Pedestrian and cycle access</p> <p>Para 2.7.4 of the Transport Assessment (TA) [AS-108] states that <i>The proposals will include a new shared-use path between Horningsea Road and the proposed site, including a new pedestrian crossing on Horningsea Road to allow pedestrians to access the proposed site from the existing shared-use path on Horningsea Road.</i></p> <p>a) The alignment of this path has been omitted from drawings. Please provide an indication of its alignment and a calculation of its likely surface area.</p> <p>b) Would the path be lit? If not, how safe and usable would it be during the hours of darkness?</p> <p>c) Would the path be fully accessible?</p> <p>d) Should the path be shown on the General Arrangement Plans [AS-149], the Works Plans [AS-150], and Design Plans - Highways and Site Access [APP-025]?</p> <p>e) There are no pedestrian facilities shown alongside the access road to the WWTP. Does this present a risk that pedestrians coming from the south would walk along the carriageway to access the facility rather than making a more circuitous approach via the aforementioned shared-use path? Please explain the rationale for not providing a footway in this location.</p>
20.26	Applicant, CCoC	<p>Access to public transport</p> <p>Para 2.7.11 of the TA [AS-108] notes: <i>improved pedestrian accessibility to the local bus stops and the provision of a new bus stop if required as part of future reviews of bus services.</i> Please provide further information as follows:</p> <p>a) are existing bus services suitably-timed to serve workers at the site?</p>

		<p>b) when would future reviews of bus services take place?</p> <p>c) how would new bus stop infrastructure be paid for and how would the funding be secured?</p>
20.27	Applicant	<p>Site access – safety</p> <p>Would the site access road and pedestrian / cycle access require any safety / crash barriers, signage or lighting? If so, please provide indicative details.</p>
20.28	Applicant	<p>Site access – safety</p> <p>Please provide tracking to demonstrate that a coach could safely turn right into the Visitors' Car Park having passed by the traffic island / pedestrian refuge close to the entrance to the Visitors' Car Park.</p>
20.29	Applicant	<p>Site access – resilience</p> <p>On page 52 of ES Chapter 19 [AS-038] the following is stated that <i>Pedestrian island crossing on Horningsea Road – This provides additional protection for pedestrians and cyclists crossing the road and ensures safe connection to shared footway. The traffic island prevents right-turns from the permanent site access road, which reduces potential conflicts at the A14 offslip Road/Horningsea Road junction.</i></p> <p>How would vehicles leave the site in the event that a left-hand turn is not possible, whether at short notice or because of planned closure (for example if the overbridge is closed because of an accident or for roadworks)?</p>
20.30	Applicant	<p>Site access</p> <p>Para 2.3.6 of the TA [AS-108] states that <i>The access road to the proposed WWTP site will be built prior to the main WWTP works commencing.</i> How would this be secured?</p>
20.31	Applicant, CCoC	<p>Cycling and walking – robustness of evidence</p> <p>TA [AS-108] Table 5-3 sets out pedestrian and cyclist counts in early December 2021.</p> <p>a) How representative are the results of these counts – are people less likely to walk or cycle during the winter / would there be a noticeable difference in the number of pedestrians and cyclists during the summer?</p> <p>b) Afternoon counts commenced at 4pm. The local primary school's day ends at 3.25pm. Could the TA have underestimated the number of children travelling on foot or by bicycle as a consequence of the count periods?</p> <p>c) Similarly, how representative are counts that took place during the school / summer holiday period (e.g. noted at para 4.2.11 of the TA)?</p>
20.32	Applicant	<p>Cycling and walking – safety</p> <p>A number of parties have expressed concern about the safety of schoolchildren using the cycle and pedestrian path alongside the B1047 Horningsea Road to travel to and from school in Fen Ditton when development is being implemented. The TA [AS-108] states that construction traffic would not travel along the construction route between the hours of 0800 and 0900 and 1500 and 1600.</p> <p>a) Have those hours been chosen to reflect typical times for travelling to and from school?</p> <p>b) Is there any usage of the cycle and pedestrian during the school's lunch period (e.g. pupils returning home for lunch)?</p>

		<p>c) Is there any flexibility for occasions when the school is opening or closing at different times? If so, how would the school communicate changes to the applicant?</p> <p>d) Would all vehicle movements across the cycle path (e.g. construction workers' private vehicles which might not be considered to be 'construction traffic') be paused during these times?</p> <p>e) Would the cycle path be kept free of other obstacles, dirt and debris which could cause an issue for cyclists and pedestrians?</p> <p>f) In the event that part of all of the cycle path is temporarily unavailable during works, how would cyclists be managed along the Horningsea Road corridor? For example, would the whole of the cycle route be closed given that it is segregated from the roadway which could prevent cyclists from safely leaving and re-joining the cycle path.</p> <p>g) How would the measures be monitored and enforced?</p>
20.33	Applicant	<p>Construction traffic – alternatives</p> <p>A number of RRs have raised concerns relating to construction-related traffic on the highway network. Bearing in mind para 4.13.10 of NPSWW (Water-borne or rail transport is preferred over road transport at all stages of the project, where cost effective...), please explain whether you have considered transporting materials and arisings by the nearby railway (e.g. via the Chesterton Railhead which is very close to the existing WWTP) or by watercourse and, if yes, why were these modes were discounted? If not, could either mode be used to reduce the number of large vehicles, particularly where safety concerns might arise due to the geometry of existing junctions? This point has not been directly addressed in the NPSWW Accordance Table [AS-130, page 79].</p>
20.34	Applicant	<p>Construction traffic – further information</p> <p>Please provide the information requested by / a response to the following points made by National Highways in its RR [RR-016]:</p> <p>a) The proposal for a traffic monitoring regime to determine the timing of the phasing of implementation works requires further details in terms of its operation and application.</p> <p>b) Construction Traffic Routes on the SRN are not sufficiently understood, and further detail is required in respect of how they would be managed, in particular the impact on Junctions 33, 34 and 35 of the A14.</p> <p>c) Should the proposed construction works require the temporary closure of eastbound off slip, this can be done for short durations at night-time only. Does this present any issues for the implementation of the project?</p>
20.35	Applicant	<p>Construction traffic routes</p> <p>Please explain why the 'Article 17 (Traffic Regulation, Part 1 - Temporary)' restriction shown on Sheet 9 of the Access & Traffic Regulation Order Plans [AS-154] between Point Q and Point T33 is proposed – this appears to extend beyond the construction route illustrated on page 185/554 of the TA [AS-108].</p> <p>Similarly, please explain why the proposed temporary restrictions between Point W and Point Y on Sheet 10 of the Access & Traffic Regulation Order Plans [AS-154] extend beyond the construction route illustrated on page 185/554 of the TA [AS-108].</p>

20.36	Applicant	<p>Construction traffic routes</p> <p>The construction route illustrated on the drawing on page 185/554 of the TA [AS-108] does not include the westbound off-slip or eastbound on-slip of J33. If these do not form part of the route, how would construction traffic travelling east from the proposed WWTP access the A14?</p>
20.37	Applicant	<p>Construction traffic routes – safety</p> <p>At Appendix G of the TA [AS-108] there are swept path analyses of the J34 on-slip. Please provide:</p> <ol style="list-style-type: none"> a swept path analysis for the off-slip junction with the A14 overbridge, including for tipper trucks; and commentary on whether construction vehicles would be able to safely turn left or right from the J34 off-slip in the event that southbound queuing to the J34 on-slip extends close to or beyond (to the north of) the junction of the J34 off-slip and the A14 overbridge (for example when concrete pouring / directional drilling works take place during the peak periods).
20.38	CCoC	<p>Construction traffic routes – safety</p> <p>With reference to the swept path analyses at Appendix G of the TA [AS-108]:</p> <ol style="list-style-type: none"> Are there any other junctions or access points that should be analysed? Where tracking indicates a kerb overrun or a restrictive road width, do you have any concerns? If so, please explain them and whether / how these could be overcome. How would any damage to footways caused by construction vehicles be rectified and by whom (would this be covered by the provisions at para 6.8.1 of the CTMP [AS-109])? Would a condition survey need to be carried out before works take place to ensure that any works-related damage can be identified?
20.39	The Applicant, CCoC, SCDC, Waterbeach Parish Council, Horningsea Parish Council	<p>Construction traffic – alternatives</p> <p><i>Applicant please respond to all parts; other parties please respond to all parts except a) and c)</i></p> <ol style="list-style-type: none"> Why is construction access to temporary accesses CA16, COA9 and CA20 (illustrated on the map at page 428/554 of the TA [AS-108]) solely via Car Dyke Road / Clayhithe Road rather than via Horningsea High Street? Are there any known road safety issues in Waterbeach? Please provide an estimate of any additional mileage and the additional carbon emissions associated with that additional mileage that would be travelled by construction vehicles travelling via the A10 and Waterbeach towards temporary accesses 7, 8 and 9 to avoid Horningsea High Street – para 3.8.20 of ES Chapter 2 [APP-034] suggests that the route via the A10 might be in the region of 7 miles. Should any additional mileage / carbon emissions be given negative weight in the planning balance, and would there be any countervailing benefits that should be given positive weight? Has an option been looked at where construction traffic is split between Waterbeach and Horningsea? If not, why not?

		<p>f) Is CCoC satisfied that suitable mitigation has been proposed for the Clayhithe Bridge / Hartridge's Lane area in response to the issue raised by HPC (see page 59 of Applicant Regard to Section 42 Consultation Responses [APP-167])?</p> <p>g) Is CCoC satisfied that suitable mitigation has been proposed for Denny End Road and Bannold Road in response to the issue raised by respondents (see page 54 of Applicant Regard to Section 47 Consultation Responses [APP-166])?</p> <p>h) Has sufficient regard been paid to the potential for delays at the Station Road, Waterbeach level crossing (see page 55 of Applicant Regard to Section 47 Consultation Responses [APP-166])?</p>
20.40	Applicant	<p>Junction modelling – clarification</p> <p>Whilst para 2.3.1 of the TA [AS-108] states that construction and associated decommissioning works are projected to start in 2024 and end in 2028, para 9.5.52 refers to construction traffic and related mitigation measures in 2038. Which construction traffic has been taken into account in the 2038 modelling?</p>
20.41	Applicant	<p>Junction modelling – clarification</p> <p>TA [AS-108] para 7.1.6 states: <i>For construction the peak is in Year 3 (assumed to be 2026), with a peak 630 movements required on Horningsea Road and the A14 off-slip and on-slip.</i> Over what time period would the 630 movements be made?</p>
20.42	Applicant	<p>Junction modelling – clarification</p> <p>The headings of Table 9-8 in the TA [AS-108] are:</p> <ul style="list-style-type: none"> • Year 4 Construction (2028) Without decommissioning • Year 3 (2026) Construction Traffic Only • Year 5 Construction (2028) With decommissioning <p>a) Why is 2028 labelled as both Year 4 and Year 5?</p> <p>b) Why is construction traffic data provided for 2026 and not for 2028?</p>
20.43	Applicant	<p>Junction modelling – clarification</p> <p>Please clarify where the following information can be found in the TA [AS-108]:</p> <ol style="list-style-type: none"> the size of the construction workforce; the expected modes for travel to and from work; where workers' private vehicles would be parked; and the hours within which workers' movements have been modelled (para 9.3.3: states that: <i>Worker mobilisation has been modelled to take place in the peak hours.</i>).
20.44	Applicant	<p>Junction modelling – clarification</p> <p>Para 6.9.3 and 6.9.5 of the CTMP [AS-109] refer to speed restrictions and temporary traffic lights on Horningsea Road. Have these been taken into account in the modelling of construction phase impacts on the A14 / Horningsea Road junction?</p>
20.45	Applicant	<p>Junction modelling – baseline</p>

		With reference to section 9 of the TA [AS-108], has operational traffic associated with the existing WWTP been removed from the baseline for the assessment of the effects of the operation of the proposed WWTP?
20.46	Applicant	<p>Trip generation – construction phase assumptions</p> <p>Para 4.2.16 of ES Chapter 19 [AS-038] states: <i>It is estimated that the Proposed Development could generate up to 1,312m³ of hazardous waste throughout the entire duration of the programme (based on Chapter 15: Material resources and waste).</i> ‘Material Resources and Waste’ is discussed in ES Chapter 16. Here the Applicant estimates that there could be 1,950 m³ (para 4.2.23) and 330m³ (para 4.2.42) of hazardous waste, a total of 2,280m³.</p> <p>a) Please explain the difference in the figures.</p> <p>b) If 1,312m³ is an incorrect figure, would a revised figure change the magnitude of the effect that is stated at para 4.2.19 of ES Chapter 19?</p>
20.47	Applicant	<p>Trip generation – construction phase assumptions</p> <p>Please clarify how the movements at para 4.2.30 of ES Chapter 19 [AS-038] add up to a total of 70 movements; please explain whether the “10 worker and staff movements for both hours” means five or ten movements in each of the hours.</p>
20.48	Applicant, National Highways, CCoC	<p>Trip generation – construction phase assumptions</p> <p>At para 3.10.3 of ES Chapter 2 [APP-034] it is stated that <i>The source of materials does not affect the transport assessment, given that the strategic highway network has the capacity to accommodate these flows. It is desirable to seek local sourcing where possible to reduce vehicle miles, total emissions and transport costs, but this is subsidiary to the need to deliver materials of an appropriate quality and longevity.</i></p> <p>Would the origin of materials have implications in terms of amount of traffic on A14 junctions, for example, if vehicles delivering materials from the east would have to use J33 to access J34 whereas vehicles arriving from the west would not?</p>
20.49	Applicant, National Highways, CCoC	<p>Trip generation – construction phase assumptions</p> <p>On page 10 of ES Chapter 19 [AS-038] it is noted that the ‘10% from the east / 90% from the west’ construction material delivery split was questioned by CCoC and National Highways.</p> <p>a) Para 2.3.4 of ES Chapter 16: ‘Material resources and waste’ [APP-048] states that the study area for the sources and availability of construction materials would be the Cambridgeshire and, where necessary, the East of England region. However, the drawing on page 259/554 of the TA [AS-108] indicates that most materials would not be from Cambridgeshire or the East of England. Should the 10% / 90% assumption should be adjusted in light of what is stated in ES Chapter 16?</p> <p>b) Has a sensitivity test of the east-west split been carried out?</p> <p>c) Do the highways authorities agree with the ‘10% from the east / 90% from the west’ split or do they require additional modelling?</p>

		d) Please explain in general terms, with reference to the effects on J33 and J34, how a change to the assumptions would change the modelled highways impacts, for example if there was a 50% / 50% split or a 90% / 10% split. Would there be any concerns in relation to the operation of the J33 Milton Interchange?
20.50	Applicant, National Highways, CCoC	<p>Trip generation – workforce movements</p> <p>In its RR Suffolk County Council [RR-005] has made the following observations:</p> <ul style="list-style-type: none"> ▪ Simultaneous NSIPs relying on the same pool of workers resulting in greater travel distances for workers than assumed due to a shortage of local labour. ▪ Recent NSIP applications have used set shift patterns to avoid workers travelling during network peak hours. However, with the multiple NSIPs using the same mitigation this may move the network peak to the times that their workers are travelling. ▪ Both can be explored through sensitivity testing. <p>Do you consider that sensitivity testing should be undertaken to address these considerations? If not, please explain why.</p>
20.51	Applicant	<p>Trip generation – time-critical activities</p> <p>a) In relation to Table 4-28 of ES Chapter 19 [AS-038], why are A14 eastbound and A14 westbound flows and flows on the J34 slip roads the same in AM and PM peaks? If vehicles arrive in the AM and depart in the PM, would flows be reversed?</p> <p>b) The AM and PM peak flows total 132 movements which is the same as the total number of vehicles per day as set out in Table 4-26. Does this mean that all movements would take place during the two peak hours?</p> <p>c) With reference to Table 4-26 of ES Chapter 19, why is the delivery of pre-cast concrete units for tank walls and the movement of imported stone for site infrastructure and temporary working platforms considered to be ‘time critical’ such that it must occur during peak hours?</p> <p>d) With reference to Table 4-26 of ES Chapter 19, how long is ‘short term’?</p>
20.52	Applicant	<p>Horningsea road – disruption during construction</p> <p>Para 4.2.135 of ES Chapter 19 [AS-038] states: <i>The programme has been designed to sequence construction of the proposed WWTP access road construction at the start of the programme so that it can be used in construction to reduce the duration of use of Horningsea Road and Low Fen Drove Way in construction.</i></p> <p>a) Do the figures presented in Table 4-40 represent the situation when the proposed WWTP access road is being used for construction?</p> <p>b) Would the impact be lesser or greater in the period before the access road has been opened for use by construction traffic?</p>
20.53	Applicant, CCoC, National Highways	Junction modelling – short-term exceptional movements

		<p>Para 9.5.22 the TA [AS-108] indicates that when construction activities would take place in the AM and PM peak hours, queue lengths would be over the maximum queue length limit and that there would be occasions where there could be queuing back from the on-slip junction to the off-slip junction. Table 9-5 indicates degrees of saturation in excess of 100% for the A14 off-slip and the Horningsea Rd Bridge SB / right turn onto the A14 WB on-slip. In the PM peak the latter would experience a queue of 129.6 passenger car units (PCU). One PCU represents a distance of 5.75m (TA para 9.2.4) and therefore it appears that a queue would be approximately 745 metres long.</p> <p>a) Would such a queue extend to the north beyond the site access, potentially affecting or delaying access to and egress from the site?</p> <p>b) If the queue extended beyond the site access how would construction-related vehicles be prevented from travelling north through Horningsea to avoid the queue?</p> <p>c) Would the capacity constraints during peak hours simply prevent the required <i>constant movement</i> of construction vehicles referred to in 10.2.3 of the TA and affect the successful implementation of the concrete pours and drilling?</p> <p>d) In respect of those junctions that would approach or exceed capacity with construction traffic at peak hours, please explain whether any temporary measures would need to be introduced on the wider highway network such as closures or diversions, also bearing in mind the need to ensure access for emergency services at all times, to enable the required short-term <i>constant movement</i> of construction traffic.</p>
20.54	Applicant, CCoC	<p>Junction modelling – traffic from multiple work sites</p> <p>In assessing the increase in construction-phase traffic in ES Chapter 19 [AS-038], has traffic associated with the proposed WWTP work site been taken into account in assessing traffic from the Transfer Tunnel works (and <i>vice versa</i>) on the links that would be affected by traffic from both work sites (Horningsea Road, A14 on-slip junction 34, A14 off-slip junction 34, and A14)? Please explain where this information is set out in the ES.</p>
20.55	Applicant	<p>Junction modelling – construction phase ‘reasonable worst-case scenario’</p> <p>Para 4.2.30 of ES Chapter 19 [AS-038] states that <i>The total peak 70 daily construction movements required for the construction of the waste water transfer tunnel, have been divided across an 8-hour working day to obtain hourly movement rates.</i></p> <p>a) Have the 70 movements been divided equally across the eight hours so that 8.75 movements in each hour have been tested?</p> <p>b) If yes, is this realistic? For example, while works would be carried out between 15:00 and 18:00 it would not be possible for construction traffic to arrive or depart for two hours during that period. Could the pauses in construction traffic result in peaks in construction traffic movements before (e.g. to deliver additional materials to be used during the moratorium) or after (e.g. to take away waste / arisings that has accumulated during the moratorium) each pause?</p>

		<p>Para 4.1.3 of ES Chapter 19 [AS-038] states that: <i>the hourly construction flows as identified in the first assumption have been added to the network peak hours (08:00-09:00, 15:00-16:00, 17:00-18:00).</i></p> <p>c) Tables 4-7 and 4-8 do not refer to 15:00-16:00; where can this information be found?</p> <p>d) Tables 4-15 to 4-19 refer to 'AM Peak' and 'PM Peak'. Which hour does the 'PM Peak' relate to? Where can information relating to the other 'PM Peak' hour be found?</p> <p>Table 4-19 (relating to transfer tunnel and shafts) sets out some 'significant' effects on Horningsea Road and J34 which 4.2.65 and 4.2.66 explain would be mitigated by restrictions on construction traffic movements to times outside of the peak hours, such that the effect during the peak hours would be 'not significant'. Similarly, Table 4-43 (relating to WWTP construction) identifies 'significant' effects which would be mitigated by peak-hour movement restrictions.</p> <p>However, the Baseline Traffic Surveys [APP-141] appear to show that, in some cases the baseline traffic flow outside of the peak hours of 08:00-09:00, 15:00-16:00 and 17:00-18:00 is of a similar order of magnitude to the baseline traffic flow during the 'peak' hours, for example:</p> <ul style="list-style-type: none"> • Site 16 / A14 off-slip between 16:00 and 17:00 (see PDF page 218/405 of [APP-141]) • Site 17 / Horningsea Road between 07:00 and 08:00 (Arm A Approach), 09:00 and 10:00 (Arm B Approach) and 16:00 and 17:00 (both approaches) (see PDF page 228/405 of [APP-141]) <p>Similarly, 9.5.24 of the TA [AS-108] states: <i>The hours outside of AM and PM peaks have significantly lower traffic volumes compared to the peak hours.</i> However, movements on the A14 off-slip (AM and PM) and the on-slip (PM) for times outside of the peak hours are not significantly different from peak hour movements according to the data presented in Table 9-6. A similar situation is apparent in Table 9-10.</p> <p>e) Please provide additional analysis of the locations listed below during the following hours: 07:00-08:00 (including any 'mobilisation' movements); 09:00-10:00; and 16:00-17:00. Please do this by way of a tracked changes update to ES Chapter 19, setting out the significance of the effects and, where relevant, any mitigation measures:</p> <ul style="list-style-type: none"> (i) Horningsea Road – Northbound ahead; (ii) Horningsea Road – Southbound ahead; (iii) J34 on-slip; and (iv) J34 off-slip. <p>Please include all traffic that would be added simultaneously to those locations by any part of the Proposed Development (for example from works at both the proposed WWTP site and the Transfer Tunnel worksite).</p>
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20.56	Applicant, SCDC, CCoC, Network Rail Infrastructure Limited	<p>Construction phase – cumulative impacts</p> <p>Para 4.5.3 of ES Chapter 19 [AS-038] states that: <i>the construction of Waterbeach Station Relocation has the potential to overlap with the construction of the Proposed Development and the Waterbeach New Town East. However, due to the lack of readily available construction traffic information for the Waterbeach Station Relocation, it is not possible to determine whether the cumulative effect of the simultaneous construction of the three developments would result in a significant cumulative effect. However, should construction of developments happen simultaneously, each developer would need to agree their Construction Transport Management Plan with the relevant highway and local planning authority.</i> Para 4.5.6 concludes that: <i>Overall, it is considered it is that the impacts of the proposed development can be mitigated limited through the proposed construction management of the transport network and are not significant.</i></p> <p>To the Applicant:</p> <ul style="list-style-type: none"> a) What efforts have been made to obtain construction traffic information for the Waterbeach Station Relocation? b) How can it be concluded that an effect that is not known can be mitigated? c) Could the potential for cumulative impacts be reduced or avoided by routing construction traffic through Horningsea? d) If there was a significant cumulative impact which could not be mitigated, what are the alternatives to the routing of construction traffic through Waterbeach; <p>To SCDC, CCoC and Network Rail Infrastructure Limited:</p> <ul style="list-style-type: none"> e) Are you satisfied with the approach suggested by the Applicant?
20.57	Applicant, CCoC	<p>Assessment of impacts – construction phase</p> <p>The ES assesses effects in relative terms and quantifies the magnitude of the effects based on the percentage increase in traffic and the assessment thresholds in Institute of Environmental Management and Assessment (IEMA) guidance. This means that some increases in traffic are not considered to be significant. Are there any instances where, even if the change in traffic volume is below the IEMA thresholds, the absolute increase in traffic could result in a harmful impact / an impact that requires mitigation?</p>
20.58	Applicant	<p>Outline Construction Workers Travel Plan</p> <p>Has consideration been given to remote parking and the use of buses / shared vehicles to transport construction workers to and from the construction areas? If not, is this a possibility?</p>
20.59	CCC, SCDC, CCoC	<p>Construction Workers Travel Plan</p> <p>Para 1.8.2 of the CWTP [APP-150] states: <i>The measures included with the final CWTP would be developed through consultation with the relevant local highway authority and the relevant local planning authority.</i></p> <ul style="list-style-type: none"> a) Please set out the measures that you consider should be included. b) How should the CWTP be secured, monitored and enforced?
20.60	CCC, SCDC, CCoC	<p>Construction Workers Travel Plan</p>

		<p>Para 4.3.1 of the CWTP [APP-150] states: <i>Staff Parking at the construction compound for the Cambridge WWTP will be limited and all spaces will be allocated. All staff requiring a parking space will have to demonstrate that arriving by private vehicle is the most practical option.</i></p> <p>a) Please explain which other travel options would be practical for members of the workforce.</p> <p>b) How would informal parking by staff and visitors, whether on or off site, be monitored and prevented?</p>
20.61	Applicant	<p>Construction Workers Travel Plan</p> <p>How do workforce numbers in section 6.2 of the CWTP [APP-150] reconcile with Table 7-4 of the TA [AS-108]? Please provide a consolidated table with actual numbers alongside percentages.</p>
20.62	Applicant	<p>Construction traffic restrictions – peak hours restrictions</p> <p>The Applicant has indicated that there would be no construction traffic movements during three ‘peak’ periods.</p> <p>a) Would any vehicles that are already at worksites remain on those sites?</p> <p>b) Where vehicles are travelling to sites, please describe (preferably illustrate on a map) the area that those vehicles would be excluded from so as not to contribute to peak traffic in that area.</p> <p>c) Where vehicles are close to that area but cannot enter it because it is a ‘peak’ time, where would the vehicles wait (ie where are the areas indicated in 6.5.5 of the CTMP [AS-109])?</p> <p>d) Bearing in mind that a number of large construction projects are expected to take place in and around Cambridge in the near future, how would parties be able to identify which vehicle movements are connected with the Proposed Development so as to ensure compliance with the CTMP?</p>
20.63	Applicant	<p>Construction traffic restrictions – geofencing</p> <p>On page 25 of Applicant Regard to Section 47 Consultation Responses [APP-166]) the potential use of geofence technology is noted.</p> <p>a) In which locations would the geofence operate?</p> <p>b) Given the nature of the local road network, where would HGVs turn if they are stopped by the geofence technology?</p> <p>c) Could this result in safety or congestion issues?</p> <p>d) Would there be independent oversight of the effectiveness of this measure?</p>
20.64	National Highways	<p>Construction traffic – marshalling on the strategic road network</p> <p>In the CTMP [AS-109] the following is noted: <i>4.2.4 The off-slip and on-slip of the A14 have been identified as a potential conflict area that may require traffic marshalling during peak hours.</i> Is it acceptable to National Highways that marshalling would take place on its network? If yes, does National Highways have any guidance or requirements in relation to marshalling that should be taken into account?</p>
20.65	Applicant	<p>Mitigation – Denny End Road</p> <p>Para 4.2.222 of ES Chapter 19 [AS-038] states <i>The A10/Denny End Road junctions (required for the movement of construction vehicles for the Waterbeach pipeline) will operate over capacity in the 2026 baseline (‘Without Development’) in the AM peak. Therefore, this junction is likely to require intervention by others prior to 2028 (opening year).</i></p>

		<p>a) Who would 'intervene' to address this capacity issue and when? Is there an approved and funded scheme?</p> <p>b) Before 'intervention', is it acceptable that construction traffic is added to this junction if it is already over capacity? Would this lead to safety issues?</p> <p>c) Should capacity enhancement works be completed before construction traffic related to the Proposed Development is routed through this junction?</p> <p>d) If there are issues / concerns, would routing some construction traffic through Horningsea lessen those concerns?</p> <p>e) Should the Proposed Development make any contribution towards capacity enhancement works?</p>
20.66	Applicant	<p>Mitigation – CTMP</p> <p>At 6.9.10 of the Construction Traffic Management Plan [AS-109] it is stated that <i>There is also a commitment to avoid HGV movements through Waterbeach during school drop-off and pick-up hours throughout term time and to reinstate any areas of footpath affected by the works and to maintain the existing alignment/gradient as much as is practicable.</i> Where is this commitment set out, and how would it be secured and enforced?</p>
20.67	National Highways, CCC, SCDC, CCoC	<p>Mitigation – CTMP</p> <p>On page xvi of ES Chapter 19 [AS-038] in respect of the proposed WWTP it is stated that ES Chapter 19 reports that significant effects on driver delay around the Horningsea Road area associated with the construction of the proposed WWTP and Waterbeach pipeline would be mitigated by the secondary measures set out in the CTMP [AS-109].</p> <p>a) Are the measures in the CTMP sufficient / satisfactory?</p> <p>b) Are they enforceable?</p> <p>c) Do you have any examples of where similar measures have been successful or unsuccessful?</p> <p>d) Who would be responsible for ensuring compliance; is it likely that they would have the resources to ensure compliance with the CTMP; and do they need additional resources to ensure compliance?</p> <p>e) Overall, what are your views on the use of secondary mitigation to address highways impacts in this case?</p>
20.68	Applicant	<p>Trip generation – clarification regarding Phase 2</p> <p>Does the implementation of Phase 2 / the extension of the Proposed Development in 2036 (as noted on Figure 1.1 of ES Chapter 2 [APP-034] but not described in TA [AS-108] section 2.3 'Construction Programme') give rise to any additional impacts? Please indicate where Phase 2 has been analysed in the TA.</p>
20.69	Applicant	<p>Trip generation – clarification regarding Phase 2 / future growth</p> <p>The RR on behalf of Marshalls [RR-030] states that the site access arrangements appear to be close to capacity up to 2038 and expresses concern that sufficient flexibility may not have been built into the site access proposals and operational access strategy to facilitate longer term growth or to accommodate a situation where the volume or origins of vehicles entering and exiting the site differs from that tested in the TA. Please respond to these observations.</p>
20.70	Applicant	<p>Trip generation – clarification regarding operational traffic</p> <p>Please clarify where the journeys noted in Table 4-12 of ES Chapter 16: Material Resources and Waste [APP-048] are considered in the TA – they are not specifically noted in Table 2-5 of the TA [AS-108].</p>
20.71	Applicant	<p>Trip generation – sludge etc imports and exports</p>

		<p>At 2.6.3 of the TA [AS-108] it is stated that: <i>Existing and future estimates of maximum number of HGV movements (two way) are outlined in Table 2-6. The future estimates are based on when the proposed WWTP is at full capacity. When the proposed WWTP is commissioned (i.e., year 1 of operation), it is likely that the traffic movements at that time will be similar to the existing Cambridge WWTP.</i></p> <p>a) Please state approximate years for the 'existing' and 'proposed' years in Table 2-6.</p> <p>b) Why would there be more HGV movements in the future – for example is this due to a larger area being covered or due to population growth (with the area served remaining broadly the same)?</p> <p>c) Does a growth factor need to be applied to reflect future population growth in the area served?</p> <p>d) Please briefly describe the existing local routing of such traffic and whether there would be any benefits arising from re-routing it from the existing to the Proposed WWTP, for example would there be a reduction in traffic on Milton Road?</p>
20.72	Applicant	<p>Trip generation – Discovery Centre</p> <p>Table 8-6 'Expected daily trips for the discovery centre' of the TA [AS-108] estimates between six and seven two-way journeys by car or on foot.</p> <p>a) If there would not be any journeys by the other modes listed in Table 8-6, why is a coach parking space shown on the submitted Design Plans (e.g. PDF Page 9/12 of [APP-025])?</p> <p>b) If coach trips are anticipated, does this indicate that the TRICS data are not representative of the usage of the Discovery Centre that is expected by the Applicant?</p>
20.73	Applicant	<p>Trip generation / junction modelling – office staff</p> <p>a) Does the '2033 operational traffic only' in Table 9-11 of the TA [AS-108] include the 30 peak hour office worker journeys set out at Table 8-2?</p> <p>b) Would it be accurate for the ExA to report that in 2033, between two-thirds and three-quarters of the predicted increase in traffic on J34 during peak hours would be attributable to the proposed office floorspace?</p>
20.74	Applicant	<p>Junction modelling – clarification / explanation</p> <p>In respect of Table 9-14 (2038 without and with operation) of the TA [AS-108], for 'Horningsea Rd SB' and 'Horningsea Rd Bridge NB' why does the PM degree of saturation (DoS) decrease in the 'with operation' scenario, even though the PCU figure is higher?</p>
20.75	Applicant	<p>Junction modelling – clarification / explanation</p> <p>With reference to Table 9-16 of the TA [AS-108], why are some PCU and DoS lower when the WWTP is in operation?</p>
20.76	Applicant	<p>Junction modelling – commitments</p> <p>With reference to TA [AS-108] para 9.2.3, please list the cumulative schemes that have been included in junction modelling for each of the years listed (2026, 2028, 2033, 2038).</p>
20.77	Applicant, CCoC	<p>Junction modelling – commitments</p> <p>TA [AS-108] paras 9.1.2 and 9.1.3 state that <i>Traffic modelling has considered the following committed developments in the vicinity of the Proposed Development:</i></p>

		<ul style="list-style-type: none"> • <i>Waterbeach New Town, including the relocation of the Waterbeach Station;</i> • <i>Marleigh Development;</i> • <i>Land north of Cherry Hinton;</i> • <i>Cambridge Eastern Access Scheme (CEAS); and</i> • <i>NEC AAP, with special reference to policy 22 which specifies a trip budget.</i> <p><i>These committed developments have been considered but are not reflected within the modelling due to the testing of the RWCS, which assumes that these committed developments would not be operational / open during the construction of the Proposed Development.</i></p> <p>a) Please explain whether any of these commitments have been taken into account in the assessment of the operational phase of the Proposed Development.</p> <p>b) If not, please explain why it is not necessary to include an assessment of these proposals.</p> <p>c) Is it correct to classify all of these prospective developments as ‘commitments’, for example do they all benefit from planning permission and / or an adopted development plan allocation?</p>
20.78	Applicant	<p>Junction modelling – robustness of Modelling</p> <p>The RR on behalf of Marshalls [RR-030] states that <i>As the performance of the site access and A14 J33 in particular are critical to longer term expansion beyond 2050 and the ability to accommodate committed (and future) Marshall developments, there are some queries on the methodology that supports the current conclusions for the capacity assessment at these junctions. Specifically:</i></p> <p>(i) <i>Why the traffic data for the strategic road network junctions collected in December 2021 has not been re-validated with data from 2022 and whether there are implications for the capacity conclusions?</i></p> <p>(ii) <i>Whether the future forecast year flows through these junctions include robust forecasts of consented flows from Springstead Village and Marleigh as Appendix K of the TA is missing which sets out the growth assumptions.</i></p> <p>(iii) <i>What assumptions were included for Cambridge East within the junction modelling?</i></p> <p>(iv) <i>How sensitive the conclusions regarding the performance of A14 J33 are in the event that the volume, timing or assignment of operational traffic varies from those within the Transport Assessment?</i></p> <p>Please respond to these questions.</p>
20.79	Applicant, National Highways, CCoC	<p>Operational traffic – assessment of effects – cumulative conclusions</p> <p>At para 4.5.11 of ES Chapter 19 [AS-038] it is stated that it is likely that junction 34 would have already been operating close to or over capacity in the 2038 future baseline (“without operation”) even without the addition of operational traffic from the Proposed Development. As this is a matter relating to background traffic growth, this has been considered as a cumulative effect. Table 4-86 of the ES indicates that a ‘major – significant’ effect would occur at ‘Horningsea Road / A14 on-slip junction – SB in’.</p>

		<p>a) Given the location of the commitments cited in para 4.5.7 of Chapter 19, how much of the 2038 baseline traffic at 'Horningsea Road / A14 on-slip junction – SB in' can be attributed to those commitments?</p> <p>b) What is the relevance of the contribution that the commitments make to the baseline – should this affect the conclusion that is drawn in relation to the acceptability of the operational effects of the proposed WWTP?</p>
20.80	Applicant, National Highways, CCoC	<p>Operational traffic – acceptability of impacts</p> <p>The TA [AS-108] states at para 9.1.7 that <i>In the future operational scenario (2038) 10-year post-opening of the proposed main WWTP, junctions relevant to the operation of the proposed main WWTP operate within or close to capacity in the peak hours. An OTMP would be required to fully manage operational vehicles during the peak hours.</i></p> <p>a) Is it acceptable to propose development at a location where parts of the network are already at or close capacity without providing any improvement to capacity?</p> <p>b) Why would it be acceptable to add operational traffic to junctions operating above capacity at peak times when it has been concluded (TA para 9.1.6) that it would not be acceptable to add construction traffic to junctions operating at capacity, not least when considering that construction traffic would be for a limited period?</p> <p>c) How and by whom would the document referred to as an 'OTMP' be monitored and enforced? Would there be any ongoing resource implications for local planning and highways authorities?</p> <p>d) How would any unacceptable outcomes be enforced against and rectified?</p> <p>e) Are the predicted DoS, such as they are increased by the Proposed Development, and suggested mitigation acceptable to the highways authorities?</p> <p>f) What degree of certainty can be attached to the suggestion of modal shift that is noted in TA para 9.5.16, bearing in mind the location of the Proposed Development?</p>
20.81	Applicant	<p>Operational traffic – J34 outside of 'peak' hours</p> <p>Please provide an assessment of operational traffic at the locations listed below during the following hours: 07:00-08:00; 09:00-10:00; and 16:00-17:00. Please do this by way of a tracked changes update to ES Chapter 19 which sets out the significance of the effects and, where relevant, any mitigation measures:</p> <p>a) Horningsea Road;</p> <p>b) J34 on-slip; and</p> <p>c) J34 off-slip.</p>
20.82	Applicant, National Highways	<p>Operational (and construction) traffic – assessment of effects – J35</p> <p>On page 8 of ES Chapter 19 [AS-038] it is noted that National Highways recommended that an analysis of J35 be undertaken.</p> <p>To the Applicant:</p> <p>a) Why has this not been done?</p> <p>To National Highways:</p> <p>b) Do you still require such an assessment?</p>
20.83	Applicant, CCoC	Assessment of impacts – operational phase

		The ES assesses effects in relative terms and quantifies the magnitude of the effects based on the percentage increase in traffic and the assessment thresholds in Institute of Environmental Management and Assessment (IEMA) guidance. This means that some increases in traffic are not considered to be significant. Are there any instances where, even if the change in traffic volume is below the IEMA thresholds, the absolute increase in traffic could result in a harmful impact?
20.84	Applicant	<p>Operational traffic routing</p> <p>Some RRs raise concerns around an increase in traffic, including sludge tankers, on residential roads during the operational period, for example RR [RR-197], which says <i>I am particularly concerned about the increase in traffic and pollution which would be caused by both the construction traffic over several years, and by the daily slurry lorries thereafter, which will impact on all residents of Horningsea and surrounding villages.</i> It appears to the ExA that, under normal circumstances, the routing of vehicles means that sludge tankers would not travel past residential properties / through residential roads in Horningsea, Fen Ditton or other villages.</p> <p>a) Is this correct?</p> <p>b) If so, would the proposed situation represent an improvement when compared with the existing situation – for example do sludge lorries travel past residential properties to access the existing WWTP?</p>
20.85	National Highways, CCC, SCDC, CCoC	<p>Operational traffic – mitigation – J34</p> <p>On page xviii of ES Chapter 19 [AS-038] it is stated that <i>Despite the addition of a small amount of operational traffic (relative to the total traffic on the surrounding road network), a major cumulative effect is identified on driver delay at the Horningsea Road / A14 on-slip junction (southbound on Horningsea Road, right-hand turn into the on-slip) in the AM And PM peak which is significant. This occurs as a result of background traffic growth in 2038 in the peak hours. With the application of the secondary measure to restrict peak period movements the effect on driver delay is reduced to neutral which is not significant. This measure would be secured through the Operation Logistics Traffic Plan, with which no significant effects on driver delay would occur.</i> A number of RRs express concerns about operational traffic running through the villages of Horningsea and Fen Ditton.</p> <p>a) Would measures in the Operational Logistics Traffic Plan (OLTP); R9 of the dDCO [AS-139]) be sufficient / satisfactory to deal with the Horningsea Road / A14 issue, and to prevent traffic from travelling through Horningsea and Fen Ditton?</p> <p>b) Are the measures enforceable?</p> <p>c) Do you have any examples of where similar measures have been successful or unsuccessful?</p> <p>d) Who would be responsible for ensuring compliance; is it likely that they would have the resources to ensure compliance with the OLTP; and do they need additional resources to ensure compliance?</p> <p>e) Overall, what are your views on the use of secondary mitigation to address highways impacts in this case?</p>
20.86	Applicant	<p>Operational traffic (staff) – mitigation – evidence to support mitigation proposals</p> <p>Para 5.3.1 of the OWTP [APP-149] states that <i>Due to the absence of a published travel plan, there is currently no existing data regarding modal splits for the existing Cambridge WWTP to serve as a baseline.</i></p>

		The reasoning for not providing actual data is unclear to the ExA. Given the number of staff working at the existing WWTP site, a survey is unlikely to be particularly onerous. Please endeavour to provide actual evidence to demonstrate current travel patterns at the existing WWTP.
20.87	Applicant	<p>OWTP – clarification of staff and visitor numbers</p> <p>It is unclear to the ExA:</p> <ul style="list-style-type: none"> a) whether the figures in Section 6 of the OWTP [APP-149] include staff working in the Discovery Centre. Please provide a full breakdown of staff numbers by job type for the existing and proposed WWTP. b) whether the application documentation includes information in relation to other potential staff including those who might not be directly employed by Anglian Water (e.g. security and cleaning personnel etc). Please provide an estimate for any such personnel as part of the requested breakdown of the number of people working on the site. c) whether account has been taken of additional trips that one would normally be associated with a workplace such as postal / courier deliveries, supplies of office sundries and so on. If not, should an allowance be added for such trips?
20.88	Applicant	<p>OWTP – evidence</p> <p>Parag 9.5.47 of the TA [AS-108] states that: <i>the Operational Worker Travel Plan (Appendix 19.8, App Doc Ref 5.4.19.8) will reduce the volume of workforce traveling by single occupancy car.</i> Para 4.5.21 of ES Chapter 19 [AS-038] indicates that single occupancy vehicle trips would be discouraged and that remote working would be encouraged.</p> <ul style="list-style-type: none"> a) Can the Applicant provide any evidence to support its statement that the OWTP would reduce single occupancy car use? b) What degree of certainty can be attached to this statement, bearing in mind the location of the site and the availability of public transport? c) Would any staff be compelled to share car journeys, to use non-car transport, or to work remotely? If yes, how would they be compelled to do so?
20.89	Applicant	<p>OWTP – sustainable travel</p> <p>In the OWTP [APP-149], Table 8.2 indicates a 55% target for staff driving to work in a car or a van. Table 6.1 estimates that there would be 92 two-way operational staff trips which appears to the ExA to amount to 46 vehicles. Para 6.1.2 says that the daily trip generation for the Discovery Centre is expected to be 13 trips to and from the site which indicates that there would be seven vehicles. In total it appears that there would be up to 53 vehicles on the site.</p> <ul style="list-style-type: none"> a) Are the above assumptions of the ExA correct? b) Does 46 vehicles (per Table 6.1) represent 55% of the total number of staff on the site? c) What is the ratio of car parking (including visitor parking) to staff members? d) Would parking permits be issued for the use of car parking? e) Would staff be able to use visitor car parking when no visits to the Discovery Centre are scheduled? If not, how would this be controlled?

		f) If 71 parking spaces are proposed to serve the Gateway and Workshop buildings, might this appear to represent a significant over-provision of car parking spaces which could encourage people to travel to the site by car or van. Please set out your justification for 71 spaces, bearing in mind that parking policies set out maxima and the aim of planning policy to encourage travel by means other than the private car.
20.90	Applicant, CCC, SCDC, CCoC	Mitigation measures Is there a need for any measures to mitigate transport-related impacts per Policy TI/2: 'Planning for Sustainable Travel' of the South Cambridgeshire Local Plan?
20.91	Applicant	Mitigation of effects of housing on existing WWTP A RR [RR-200] suggests a range of measures that should be adopted to mitigate the effects of the housing at NEC. Should the Applicant be responsible for delivery of any of these mitigation measures, or at least make a contribution towards them? Please set out the justification for your response.
20.92	Applicant, CCoC	Approvals – agreement of traffic management works On page xii of ES Chapter 19 [AS-038] it is stated that <i>For all highway related approvals, Cambridge City Council are consulted as per the standard highway approvals process to ensure traffic management works are coordinated with the wider highway network operation. However, the DCO provides The Applicant with the necessary powers to undertake the works that are needed.</i> Is there any need for CCoC (as highways authority) and National Highways to be consulted?
20.93	Applicant, SCDC, CCoC	Electric vehicle charging How would electric vehicle charging points be secured to ensure compliance with (<i>inter alia</i>) Policy 23 of the Minerals and Waste Local Plan 2021?
20.94	Applicant, SCDC, CCoC	Requirement 12 – OWTP a) Should this requirement include a provision relating to ongoing implementation of the OWTP? b) Should there be a mechanism by which the effectiveness of the OWTP can be reviewed and, if necessary, new measures agreed if targets are not being met?
20.95	CCoC	Highway network / roads – existing a) Do the weight limits on Horningsea Road have any implications for the construction or operational phases of the Proposed Development? b) Should the weight limits be removed or changed?
21. Water resources		
21.1	Applicant	Drafting error Please correct the referencing error in para 7.3.1 of the oOMMP [AS-073].
21.2	Applicant	Drafting error Para 3.1.2 of the FRA [APP-151] refers to Appendix 0 which does not exist – please update the document with the correct appendix reference.
21.3	Applicant	Capacity

		Please confirm the PE capacity of the existing and proposed WWTP – please identify the Waterbeach Recycling Centre capacity, and the PE capacity of all sites at present and at working at full capacity (a table setting out this information would be helpful). As noted with the Save Honey Hill Group RR [RR-035 Section 8.2], there are differing figures presented within the application documents, so a clear summary of the existing and proposed PE capacity is required. The proposed capacity for different phases of the Proposed Development and future projections would also be helpful as part of the table.
21.4	Applicant	Response to CCoC RR Please provide a detailed response to the water resources comments contained within the RR from CCoC [RR-001] (section 14).
21.5	Applicant NE, EA	WINEP guidance To what extent has the water industry national environment programme (WINEP) guidance (DEFRA, 2022) influenced the Proposed Development and what effect does it have on the assessment of this proposal?
21.6	Applicant	Private drinking water sources ES Chapter 20 Water Resources [AS-040] describes the potential impact on two private drinking water sources from construction activity as 'slight adverse, not significant'. a) Has monitoring of water quality in these water sources been proposed and if so where is it secured? b) Are there any other private water sources which could be impacted as a result of the Proposed Development? c) How can the ExA have confidence that the proposed no-derogation agreements would be agreed and secured with the owners of the private groundwater sources if required? d) Who would determine if a no-derogation agreement was necessary?
21.7	Applicant	Private drinking water sources What action plan is proposed in the Water Quality Management Plan(s) or Pollution Incident Control Plan to warn users of the private wells in the event of a spillage potentially contaminating groundwater, either during construction or operation?
21.8	EA	Mitigation Is the mitigation proposed to limit potential water pollution of the Black Ditch and Quy Fen sufficient?
21.9	EA	Assessment Does the ES adequately consider the influence of the additional transfer of Waterbeach effluent on the Dry Weather Flow (DWF) effluent return to the River Cam?
21.10	EA, CCoC	Monitoring and mitigation NE advises that this groundwater-dependent site is included in the groundwater monitoring and mitigation strategy, because ES Chapter 20 [AS-040] indicates the potential for impacts on water levels at Wilbraham Fen SSSI during the dewatering phase. Is this necessary in your view?
21.11	Applicant, NE	Update following meeting Please provide an update regarding the meeting referenced in the RR from NE [RR-015] regarding hydrology.

21.12	The EA	Review of hydraulic modelling Has the EA reviewed the hydraulic modelling undertaken by the Applicant as part of the FRA, and does the EA have comments on this?
21.13	Applicant	Assessment Regarding the preliminary risk assessment [AS-089], why does the conceptual site model and preliminary qualitative risk assessment (PRA) make no reference to the Waterbeach Water Recycling Centre (WRC)? Why was there no testing of groundwater within the Waterbeach WRC for contaminants?
21.14	Applicant	Assessment Regarding the preliminary risk assessment [AS-089], should the ENVIROCHECK cover all of the area within the Order Limits as suggested by the EA in its RR [RR-013]? Why, why not?
21.15	Applicant	Assessment Please provide further clarification on the magnitudes of impacts to groundwater from Cr III as referenced by the EA [RR-013].
21.16	EA	Review of ConSim models Has the EA reviewed the digital ConSim models for the contaminant transport modelling assessment and does the EA have comments on this?
21.17	Applicant	Monitoring The EA and NE propose that operational phase groundwater quality monitoring for the wider scheme should be carried out so that any unacceptable impacts can be detected (such as impacts on SSSIs) and appropriate mitigation measures implemented. NE also advise that monitoring of the water quality of the Black Ditch, which is hydrologically connected to Stow-cum-Quy Fen SSSI, should be carried out in addition to water level monitoring during construction and operation. Is this necessary in your view – why / why not?
21.18	Applicant	Mitigation The EA raise particular concerns regarding potential leakages from infrastructure that would be used for underground or sub-water table transmission of pollutants. Please detail how this would be avoided.
21.19	Applicant	Water consumption The EA expects water efficiency standards and water consumption estimates to be provided to them. Please confirm if and when this will be completed.
21.20	Applicant, CCC, SCDC, CCoC	Capacity Some RRs (e.g. [RR-030, RR-035]) suggest that the capacity of the proposed WWTP may not be sufficient to cater for the development of Cambridge East, North East Cambridge and other planned development owing to uncertainties around future housing growth, which could lead to the plant being undersized, potentially constraining future housing growth. To what extent do you agree or disagree with this? Please evidence your stance on this matter.
21.21	Applicant	Assessment

		Please explain how the assessments in the ES have addressed the potential for further extension in capacity beyond 2041 to accommodate for anticipated flows into the 2080s and 2090s?
21.22	Applicant	<p>Benefits</p> <p>A reported benefit of the Proposed Development would be greater resilience and improved storm management, reducing storm overflows and combined sewer overflows – could the existing WWTPs be updated to achieve the same or similar level of benefit? If not, why not?</p>
21.23	Applicant	<p>Benefits</p> <p>Could the existing WWTPs be updated to reduce the concentration in final treated effluent discharges of phosphorus, ammonia, total suspended solids and biological oxygen demand (BOD) to achieve similar benefits to the proposed WWTP? If not, why not?</p>
21.24	Applicant	<p>Abnormal operating conditions</p> <p>How often are abnormal operating conditions likely to occur at the proposed WWTP – data from the operation of the existing WWTP would be useful in this regard. How often do stormwater discharge events happen at the existing WWTP?</p>
21.25	Applicant	<p>Monitoring</p> <p>Para 4.1.105 of ES Chapter 20 [AS-040] suggests that the CoCP Part A [APP-068] details that monitoring of boreholes would be required and the scope of which would need to be agreed with relevant stakeholders.</p> <ol style="list-style-type: none"> Please direct the ExA to where this is contained within the CoCP Part A – para 7.5.2 suggests that monitoring would take place, but not that the scope would be agreed with relevant stakeholders. What mechanisms would be put in place if the monitoring shows unacceptable levels of dewatering to the West Melbury Marly Chalk Formation? What level of dewatering would be considered unacceptable / result in a trigger for action to be taken? Please detail the locations at which piezometers were installed in boreholes to allow groundwater levels to be monitored.
21.26	Applicant	<p>Monitoring</p> <p>Where is the proposed monitoring detailed within para 4.1.113 of ES Chapter 20 [AS-040] secured?</p>
21.27	Applicant	<p>Monitoring</p> <p>CoCP Part A [APP-068] states that 5.14.3 <i>Where possible land drains will be avoided. If this is not possible then these will be repaired. In localised areas where there is extensive land drainage, it may become necessary to install a Pre and Post works land drainage system in consultation with landowners, their tenants and/or land agents.</i> Repairs to drains should ensure that the functionality of the drain is equal to, or better than it was prior to commencement of works – this should be made clear in the CoCP Part A. What constitutes “extensive land drainage”? Please provide more information around this definition and the triggers for a pre and post works construction drainage system and how this would be agreed with landowners and their tenants and mechanisms to overcome this matter if not agreed by all parties.</p>

21.28	Applicant	<p>Assessment</p> <p>The impacts from groundwater flows and levels for the proposed WWTP due to dewatering in the West Melbury Marly Chalk Formation (p89 of ES Chapter 20 [AS-040] onwards) does not appear to reference the pile foundations which go much deeper than the stated depths of the proposed WWTP (e.g. storm water tank foundation depth parameter is - 15.5m AOD). Are the foundations of the Proposed Development likely to affect dewatering in the West Melbury Marly Chalk Formation and impact on groundwater?</p>
21.29	Applicant	<p>Clarification</p> <p>The impacts on water resources set out under Testing and commissioning of proposed WWTP – groundwater quality [AS-040], para 4.1.82 states that <i>Tests will be undertaken on tanks and pipes following installation to ensure they will hold water at the design pressure and not leak. The source of this water will be agreed as part of a commissioning plan. The source may comprise final effluent from the existing Cambridge WWTP or from the existing Waterbeach WRC, conveyed to the proposed WWTP via the new waste water transfer tunnel or Waterbeach pipeline.</i> However, the Outline Commissioning Plan [AS-053] (section 3) does not reference the use of final effluent from the existing Waterbeach WRC and suggests that secondary effluent could be used from the existing WWTP. Furthermore, it does not set out that the source needs to be agreed as part of the detailed commissioning plan. Please provide clarity on this matter.</p>
21.30	EA	<p>Permitting and benefits</p> <p>Do you consider the assumed indicative discharge consent limits for water quality determinants contained within Table 4-1 of ES Chapter 20 [AS-040] to be reasonable and realistic? How likely is it that the extent of the suggested benefits could be reduced during the permitting process?</p>
21.31	Applicant	<p>Mitigation</p> <p>Para 4.2.15 of ES Chapter 20 [AS-040] provides secondary mitigation measures to reduce impacts of the outfall on scour during operation and notably during maximum stormwater discharges. Please confirm how mitigation by design refinement suggested by the Outfall CFD Report [APP-157] at the detailed design stage would be secured through the dDCO?</p>
21.32	Applicant	<p>Monitoring</p> <p>Para 4.2.84 15 of ES Chapter 20 [AS-040] states that <i>It is unlikely that any impact would be evident in changes in groundwater levels in the area of the landscape masterplan, although monitoring of groundwater levels will continue throughout construction and into the operational period. The monitoring data will be assessed and compared with records for groundwater levels elsewhere in the aquifer during operation.</i> What is the purpose of this monitoring in relation to this matter and what would be a trigger to take action, and what would this action be?</p>
21.33	Applicant	<p>Benefits</p> <p>Benefits on water quality:</p>

		<p>a) In terms of the beneficial impacts cited in ES Chapter 20 [AS-040], please confirm whether the improvements are in comparison to the use of the existing WWTP only, or are in comparison to the existing WWTP and Waterbeach WRC combined?</p> <p>b) In terms of the benefits cited, are these in comparison to the existing WWTP functioning as it is now (below capacity), or functioning at full capacity?</p> <p>c) In terms of the benefits cited, are these based on the proposed WWTP running at capacity under Phase 1 of the development, capacity under Phase 2 of the development, or with future population growth beyond this in mind? It is noted that this is explained for the impacts from operation of outfall under normal conditions on water quality, but not for other matters.</p>
21.34	Applicant	<p>Drainage Strategy R15 of the dDCO [AS-139] requires a detailed drainage strategy be submitted for each phase of development, apart from the enabling phase. Why is a detailed drainage strategy not required for the enabling phase, given that enabling works include construction of development which could impact on surface water drainage e.g. construction of access, offices, land drainage works etc?</p>
21.35	Applicant	<p>Assessment Why have increased treated flows on combined sewer outflow not been modelled, particularly noting that stormwater discharge incidents have been modelled and that the benefits of the Proposed Development include fewer combined sewer overflow incidents?</p>
21.36	Applicant, EA	<p>Benefits What weight can be offered to the suggested benefits of reduced Combined Sewer Overflows, if the impacts of the Proposed Development in this regard have not been modelled?</p>
21.37	Applicant	<p>Monitoring Para 4.2.126 of ES Chapter 20 [AS-040] states <i>that During the operation of the proposed WWTP, water quality monitoring should be undertaken in the pond receiving the discharge from the sub-surface drainage network, the drain connected to Black Ditch which receives the discharge from the pond, and also Black Ditch.</i> The word “should” indicates that this may not happen. How can water quality monitoring therefore be assured and secured through the dDCO or environmental permitting?</p>
21.38	Applicant	<p>Monitoring How would the monitoring measures set out on pages 137-138 of ES Chapter 20 [AS-040] be secured?</p>
21.39	Applicant	<p>Assessment Please provide a detailed response to the EA's concerns [RR-013] regarding lack of assessment of the potential impact of increased flood levels on local flood risk from smaller magnitude flood events – the EA suggests that <i>The FRA needs to clearly show the locations of the areas of land where an increase in flood depths is shown in the modelling during different flood events.</i> If needed, please liaise with the EA on this matter to work towards a resolution.</p>
21.40	EA	<p>Assessment - clarification</p>

		Please provide more detail regarding the following statement within [RR-013]: <i>Insufficient preliminary assessment and analysis. There is further clarification, justification and information that needs to be supplied to demonstrate that there will be no detrimental impact on groundwater.</i> Please confirm what additional work needs to be carried out in your view by the Applicant.
21.41	EA	Water supply Within your RR [RR-013], it is stated that <i>The proposed new facility is replacing the existing works so no additional demand to the water supply will be made. We are expecting water efficiency standards and water consumption estimates to be provided to us.</i> However, the capacity of the proposed WWTP is to be increased to meet population demands as set out within the ES. Does this affect your comments regarding demands on the water supply and in relation to the conclusions drawn by the Applicant regarding the impacts of the development in relation to Water Resources?
21.42	EA	Water Framework Directive The Applicant states within the Water Framework Directive Assessment Report [APP-153] that as a result of the Proposed Development, the phosphate status for the River Cam is likely to change from 'poor' to 'moderate', which meets with the 2027 WFD objective. a) To what extent do you think this is likely and to what is the significance of this benefit to the application? b) Do you consider that the Proposed Development meets the requirements of the Water Framework Directive and its daughter directives, including those on priority substances and groundwater?
21.43	Applicant, EA	Monitoring Within [RR-013], the EA recommends monitoring of Wilbraham Fen SSSI during the de-watering-phase. The Applicant states that there would be a negligible impact on the SSSI and does not propose monitoring. Please discuss this matter further to reach a conclusion and update the ExA.
21.44	Applicant	Surface water drainage strategy CCoC as the Local Lead Flood Authority [RR-001] request additional details and clarification regarding the proposed surface water drainage strategy. Please liaise with the County Council on this matter and provide an update, with any relevant additional information, to the ExA.
21.45	Applicant	Flood risk The CoCP Part A [APP-068] states that construction compounds and storage areas would be located in flood zone 1 <i>where feasible</i> . Based on the sequential approach, construction compounds should ideally be secured in Flood Zone 1 with no fluvial flood risk to access – please confirm why this is not secured in full, or preferably amend the document accordingly.
21.46	Applicant	Flood risk

		Within the FRA [APP-151], the proposed WWTP has been classified as 'less vulnerable' development. Annex 3 of the NPPF confirms that sewage treatment works are less vulnerable development, if adequate measures to control pollution and manage sewage during flooding events are in place. Please set out the measures to control pollution and manage sewage during flood events, to ensure compliance with Annex 3 of the NPPF.
21.47	EA, CCoC	Flood risk Do you agree with the Applicant's approach to climate change allowance within the FRA [APP-151] regarding fluvial flood risk?
21.48	Applicant, CCoC, CCC, SCDC	NPSWW In accordance with the requirements of NPSWW para 4.4.10, please confirm if there are any relevant national and local flood risk management strategies which apply to any part of the application site?
21.49	Applicant	Flood risk Whilst the Sequential Test has been applied to the main area of the proposed WWTP, which is located in Flood Zone 1, it does not appear that the Sequential Test has been applied to the other elements of the proposal (outfall, pipelines and tunnel), which are located in Flood Zones 2 and 3. It is noted that the Applicant considers the outfall, pipelines and tunnel are classified as 'water compatible' development. However, in accordance with the requirements of 4.4.14 of NPSWW, in the first instance preference should be given to locating projects in Flood Zone 1 and if there are no reasonably available sites, then projects can be located in Flood Zone 2. ES Chapter 3 Site Selection and Alternatives [AS-018] gives little information on site selection based on flood risk, therefore the ExA is unclear how the Sequential Test has been applied at all stages of the site selection process. The FRA should detail the how the Sequential Test was been applied during site selection, including details of alternative locations considered and why they were not deemed suitable. It is also highlighted that temporary works compounds would be located within Flood Zones 2 and 3 which the Sequential Test has not been applied to, and therefore further justification is required in this regard.
21.50	Applicant	Flood risk The Notes to Table 2: Flood Risk and flood zone 'incompatibility' contained within para 079 of the PPG on flood risk and coastal changes states that <i>Some developments may contain different elements of vulnerability and the highest vulnerability category should be used, unless the development is considered in its component parts</i> . Please justify why the development has been allocated different levels of vulnerability within the FRA [APP-151] and how it can be broken down into component parts for the purposes of flood zone incompatibility bearing in mind the connectivity between all parts.
21.51	Applicant	NPSWW Please provide evidence to show how the Proposed Development meets the three elements detailed in para 4.4.17 of NPSWW.
21.52	Applicant	Surface water Please confirm whether the surface water drainage arrangements are 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?

21.53	Applicant	Mitigation Para 6.3.3 of the FRA [APP-151] states that <i>The CoCP Part A and B (Appendix 2.1 & 2.2, App Doc Refs 5.4.2.1 & 5.4.2.2) requires that the Principal Contractor(s) consult with the Environment Agency, Lead Local Flood Authority and any other relevant risk management authorities in respect of the flood risks in the preparation of the Emergency Preparedness Plan for construction work in areas at risk of flooding.</i> However, the CoCP does not require that the Local Lead Flood Authority or relevant risk management authorities are consulted on the preparation of the Emergency Preparedness Plan. Please update the CoCP Parts A and B accordingly.
21.54	Cambridge Water	Water supply The Applicant states that the potable water supply to the proposed WWTP would be from Cambridge Water, with a new connection suggested from Horningsea Road running adjacent to the new access road. Can you confirm whether this is likely to be agreed if the Proposed Development were consented?
21.55	EA, NE	Water supply A number of RRs refer to an objection from the EA and NE in June 2023 to the increase in housing in Cambridgeshire on the grounds that supplying water to these homes would pose a significant risk to the local water supply and would also bring about harm to the environment – can you confirm whether this was the case and the context of this objection?
21.56	Applicant	Assessment Save Honey Hill Group RR [RR-035] suggests that the potential 20% reduction in summer low flow of the River Cam in relation to climate change and associated reduction in dilution at the proposed outfall has not been considered in relation to the impacts on water quality, or within the HRA or WFD assessment. Please confirm whether this is the case or not, and explain why.
21.57	Applicant	NPSWW Please demonstrate how the Proposed Development has had regard to the most up to date River Basin Management Plan (including any relevant draft Plan), in accordance with the requirements of para 4.2.8 of NPSWW.
21.58	Applicant, CCC, CCoC, SCDC	NPSWW Are there any Water Resources Management Plans (including any emerging plans) which are relevant to the Proposed Development? If so, please set out the interactions of the Proposed Development with such plans, in line with para 4.2.8 of NPSWW. To what extent may water supply be a constraint of any new housing development proposed within the NEC AAP or other future housing growth?
21.59	EA, CCC, CCoC, SCDC, NE.	Review of additional information Please review and comment on the additional information provided by the Applicant in response to the ExA's Procedural Decision [PD-004], regarding the impacts of the Proposed Development on water resources with particular reference (but not limited to): the oOMMP [AS-073], Appendix 20.5 Fluvial Modelling Report [AS-113] and Appendix 20.6 3D Velocity Mixed Model [AS-114].
21.60	Applicant	Mitigation

		Not all of the mitigation measures proposed within para 4.1.66 of ES Chapter 20 [AS-040] are contained within the oOMMP [AS-073]. Please update the oOMMP accordingly.
21.61	Applicant	<p>Effects</p> <p>ES Chapter 20 [AS-040] para 4.2.33 states that there would be a moderate significant beneficial effect on the water quality of the River Cam during operation of the Proposed Development compared to the current conditions. However, within the same para it is also stated that climate change could impact on low flows, which could cause a substantial reduction in river flow which dilutes the final effluent discharge (thus reducing the stated beneficial impacts on the River Cam). Given that the Proposed Development should be assessed on a worst case scenario basis, please justify the conclusion that there would be a residual significant beneficial effect on the water quality of the River Cam, with the aforementioned impacts of climate change taken into account.</p>
21.62	Applicant	<p>Additional information</p> <p>ES Book of Figures Water Resources [APP-067] Figure 20.1 does not delineate flood risk zones 3a and 3b – please updating the map accordingly.</p>
21.63	Applicant	<p>Water quality management plan</p> <p>dDCO [AS-139] R22 requires the provision of a water quality monitoring plan prior to operation of the Proposed Development – why is this not required prior to commissioning of the Proposed Development, which could also have potential impacts on water quality?</p>
21.64	Applicant	<p>Additional information</p> <p>Please provide the outline Operational Water Quality Monitoring Plan referred to in R22 of the dDCO.</p>

ANNEX A: Cambridge Waste Water Treatment Plant Relocation project - Compulsory Acquisition / Temporary Possession Objections Schedule

In the event of a new interest in the land, or Category 3 person, being identified the Applicant should inform those persons of their right to apply to become an Interested Party under s102A PA2008.

Obj No. ⁱ	Name/ Organisation	IP/AP Ref No ⁱⁱ	RR Ref No ⁱⁱⁱ	WR Ref No ^{iv}	Other Doc Ref No ^v	Interest ^{vi}	Permanent/ Temporary ^{vii}	Plot(s)	CA? ^{viii}	Status of objection

i Obj No = objection number. All objections listed in this table should be given a unique number in sequence

ii Reference number assigned to each Interested Party (IP) and Affected Person (AP)

iii Reference number assigned to each Relevant Representation (RR) in the Examination library

iv Reference number assigned to each Written Representation (WR) in the Examination library

v Reference number assigned to any other document in the Examination library

vi This refers to parts 1 to 3 of the Book of Reference:

Part 1, containing the names and addresses of the owners, lessees, tenants, and occupiers of, and others with an interest in, or power to sell and convey, or release, each parcel of Order land;

Part 2, containing the names and addresses of any persons whose land is not directly affected under the Order, but who “would or might” be entitled to make a claim under section 10 of the Compulsory Purchase Act 1965, as a result of the Order being implemented, or Part 1 of the Land Compensation Act 1973, as a result of the use of the land once the Order has been implemented;

Part 3, containing the names and addresses of any persons who are entitled to easements or other private rights over the Order land that may be extinguished, suspended or interfered with under the Order.

vii This column indicates whether the applicant is seeking compulsory acquisition or temporary possession of land / rights

viii CA = compulsory acquisition. The answer is ‘yes’ if the land is in parts 1 or 3 of the Book of Reference and the Applicant is seeking compulsory acquisition of land / rights.