

Response to ExA's First Written Questions (ExAQ1)

This document sets out the response to the Examining Authority (ExA)'s First Written Questions [PD-008] and requests for information (ExQ1) by Cambridgeshire County Council (CCoC). The table below sets out the topic, question number and CCC's response.

Question Number	Question for	Question	Cambridgeshire County Council (CCC)
General & Cross Topic Questions			
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.	The Greater Cambridge Partnership (GCP) is delivering a 'Greenway' project to improve non-motorised user connections between Fen Ditton and Horningsea. Part of the proposals for this Greenway involve providing for equestrian access in the western verge of the B1047 (to the south of the A14) and Horningsea Road (north of the A14). This enhanced provision would connect to the Applicant's proposed improvements to the B1047 bridge over the A14.
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>	CCoC would refer the ExA to the ExQ1 response by Cambridge City and SCDC.

		<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 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</p>	<p>a) CCoC does not 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 NPSWW was decided.</p> <p>b) The County Council considers policy provisions of the NPSWW relating to ‘factors for examination and determination of applications’ and the ‘generic impacts’ are not up-to-date to the extent that the NPS was designated over 10 years ago. That said however the County Council does not consider these provisions can or should be supplemented or disregarded.</p> <p>c) CoCC notes a number of factors which it considers are relevant to this question. The Appraisal of Sustainability set out in the NPSWW includes reference to Waste Water treatment infrastructure being essential for public health and a clean environment, accounting for population growth and adaption to climate change. The proposed relocation and modernisation could have a significant positive effect on water quality and resources. Furthermore, the NPSWW states that one of the key drivers for new waste water NSIPs as noted in the NPS at [1.4.3] is to “<i>improve water quality in certain locations to meet statutory European and national requirements</i>”. The NPSWW states at [1.2.1] that “<i>the population equivalent threshold in the Planning Act 2008 is likely to limit the geographical location of potential projects to very large conurbations</i>’ and the sustainability effects of the NPS had previously been considered in the context of new waste water</p>

		<p>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>	<p>NSIPs within a mature urban environment. The proposed development would not be in a mature urban environment, the development is consequently likely to result in adverse visual effects with many possible receptors in the proposed location, and in the short term, noise disturbance during construction. However, the NPSWW states that ‘there are likely to be positive effects for biodiversity related to improvements in water quality’ [1.4.3] which need to be balanced against any potential negative effects of the proposed development to relate to noise, landscape and visual effects and the impact from construction. Further the NPS at [3.1.3 and 3.1.4] states that when considering any proposed in waste water infrastructure development, and “in particular when weighing its adverse impacts against its benefits”, the decision maker should take a number of matters into account. These include</p> <ul style="list-style-type: none"> • its potential benefits including its contribution to meeting the need for waste water infrastructure, job creation and any long-term or wider benefits; and • its potential adverse impacts, including any long-term and cumulative adverse impacts, • as well as any measures to avoid, reduce or compensate for any adverse impacts. <p>3.1.4 In this context, the decision maker should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels. These may be identified in this NPS, in the application or elsewhere (including in local impact reports)”</p> <p>d) CCoC does not consider that there are any other considerations relating to the need for waste water infrastructure that should be taken into account which are not noted in NPSWW.</p> <p>e) The CoCC does not consider that the NPSWW specifically ‘allows’ for or addresses justification for proposed waste water infrastructure</p>
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			<p>that is based upon enabling housing development (or any other development to come forward). However, the resilience of the existing infrastructure, population growth and the suitability of retaining the current infrastructure in the current location are a consideration in the planning balance, along with how this fits with the Government's other key policy objectives.</p> <p>f) We do not consider there are 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. CoCC is aware of the principle of enabling development in other planning contexts.</p>
2.3	Applicant, CCC, CCoC	<p>Effect of NPSWW 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 EFW Group Limited v Secretary of State for Business, Energy and Industrial Strategy [2021] the courts have confirmed that a s35 Direction does not in itself make the application an NSIP and therefore that the presumption in</p>	<p>a) The County Council would refer the ExA to the response by Cambridge City Council and SCDC to this questions. The County Council considers that establishing whether the NPS has “effect in relation to the proposed to development of the description to which the application relates” or not, in accordance with section 104 or section 105 of the Planning Act 2008, rests with the ExA and Secretary of State.</p> <p>b) See response to a) above.</p> <p>c) See response to a) above.</p> <p>d) See response to a) above.</p> <p>e) See response to a) above.</p> <p>f) See response to a) above.</p>

		<p>favour of development does not apply and s105 does apply.</p> <p>Similarly, RR [RR-151] states that 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.</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>	
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2.4	Applicant, CCC, SCDC	<p>National policy ES Chapter 16 para 1.3.5 [APP-048], under the heading 'National Planning Policy for Waste 2014' (NPPW), states that 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</p>	<p>a) Please see Q2.9 below that describes the history of the MWLP and consideration of the WWTP relocation. When preparing the most recent M&WLP which was adopted in July 2021 the County consulted with the local authorities. The plan was the subject of examination in 2020. The County took the NPPW into account and the Inspector found MWLP sound.</p> <p>b) The County Council has searched its archives, during the preparation of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (MWLP), Anglian Water did respond to the various consultations that were undertaken during the</p>

		<p>management facilities (Department for Communities and Local Government, 2014).</p> <p>NPPW states at para 3 that when preparing Local Plans waste planning authorities should 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.</p> <p>a) Why did the local authorities not identify a suitable site for a replacement WWTP through their local plan process?</p> <p>b) Did the Applicant advocate that the local authorities identify a site? If yes, please provide evidence of this.</p>	<p>preparation of the MWLP. However, no responses from Anglian Water recorded during the preparation of the plan included advocating the identification of any new sites or areas of search. In the absence of a site or area being proposed, none would be assessed or allocated / identified within the Plan.</p>
2.6	Applicant, CCC, SCDC, CCoC	The development plan	The relevant development plan policies are contained within the Cambridgeshire and Peterborough Minerals and Waste Local Plan

		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)?	(MWLP), adopted July 2021 and the South Cambridgeshire Local Plan 2018. CCoC has provided further information on the relevant policies from their MWLP and compliance in their Local Impact Report.
2.8	Applicant, CCC, SCDC	The development plan 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.	Policy 11 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (MWLP) enables provision of Water Recycling Areas if it meets the criteria listed in the policy and the MWLP also identifies existing Water Recycling Areas (WRA) on the Policies Map. Policy 16: Consultation Areas safeguards (among other things) Water Recycling Areas as identified on the Policies Map under Policy 11. Policy 16 states that “development within a Consultation Area will only be permitted where it is demonstrated that the development will: ... (c) not prejudice the existing or future use of the area for which the Consultation Area has been designated;” In the event that alternative provision is made elsewhere and Anglian Water, as the sewerage undertaker, deemed the existing WWTP facility as no longer needed redevelopment would be unlikely to be opposed, subject to the redevelopment proposal also being considered suitable alongside other protected mineral and waste uses in the area and the wider MWLP policies within the development plan.
2.9	Applicant, CCoC	The development plan – Minerals and Waste Plan The Planning Statement [AS-166] notes on page 102 that the Cambridgeshire and Peterborough Minerals and Waste Plan Site Specific	a) An allocation for the Honey Hill site now the subject of this DCO application was included in the Draft Cambridgeshire and Peterborough Minerals and Waste Core Strategy Preferred Options Consultation Document (2006), as a result of the work that was undertaken by Cambridgeshire County Council, Cambridge City Council and South Cambridgeshire District Council, with other parties, to plan the future of the Cambridge Northern Fringe (East), which was identified as a location

		<p>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.</p> <p>a) Why did CCoC consider identifying land for a replacement WWTP at that time?</p> <p>b) Please provide:</p> <p>(i) a copy of the draft policy and supporting text for Site SSP15;</p> <p>(ii) details of the decision setting out the reasons why the proposed allocation was not taken forward; and</p> <p>(iii) any background information / evidence base relating to the selection of sites for a replacement WWTP.</p>	<p>for housing and employment in 2003 Cambridgeshire and Peterborough Structure Plan. The redevelopment proposed residential development, community uses, commercial uses and a new railway station. Anglian Water recognised the strategic need for sustainable redevelopment in the area located in the Cambridge Northern Fringe (east) adjacent to the A14 at the Issues and Options Stage in June 2005 and was prepared to consider the feasibility of relocating their site. This requirement was considered through Topic SS5: Milton Wastewater Treatment Works, where a broad range of criteria that Anglian Water provided was consulted upon to seek comments on whether the outlined criteria were appropriate, and whether any others should be considered. This effectively led to a number of sites and 'Areas of Search' being developed and consulted upon, ahead of a preferred option being published (as covered in our answer to point (b) below). The preferred option did not progress into the Core Strategy adopted in 2011, as the deliverability of the proposal was not considered viable as a result of the findings from the feasibility study at the time, which was an essential test for the soundness of the Local Plan. (For details regarding feasibility studies related to the relocation of the WWTP see SCDC LIR paragraphs 6.16 and 6.17).</p> <p>b) (i) Cambridgeshire and Peterborough Minerals and Waste Core Strategy – Development Plan Document – Preferred Options (November 2006). The ExA attention is drawn to pages 56-58:</p> <p><i>4.2.3 Relocation of Milton Waste Water Treatment Works</i></p> <p><i>Issues / Options Paper Topic SS5: Milton Waste Water Treatment Works</i></p> <p><i>Milton Wastewater Treatment Works (Milton WwTW) is located in the Cambridge Northern Fringe (East), adjacent to the A14, in a strategic area that has been identified for sustainable redevelopment. The redevelopment is proposed to include residential development, community uses, commercial uses and a new railway station.</i></p>
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			<p><i>Milton WwTW occupies a significant part of the Cambridge Northern Fringe (East) area. With the other stakeholders, Anglian Water is currently considering the feasibility of relocating Milton WwTW. If the Cambridge Northern Fringe (East) area is redeveloped, Milton WwTW needs to be relocated and a new site would have to be found.</i></p> <p><i>This is a matter that would be addressed through the new Minerals and Waste Development Plan. Anglian Water have identified a broad initial range of criteria that will need to be considered in identifying a new site, these include the following.</i></p> <ul style="list-style-type: none"> <i>• proximity to the River Cam – any site must be close to the River Cam to allow the efficient discharge of treated effluent</i> <i>• area of site – any site should be around 20 hectares</i> <i>• road access – any site must have good road access</i> <i>• distance from residential areas – any site must be away from residential areas and access to any</i> <i>• site should not be via residential areas</i> <i>• site characteristics – any site should not have unusual ground conditions or characteristics</i> <i>• a maximum distance from existing wastewater treatment works at Milton – any site should be a suitable distance from the existing site at Milton, avoiding the need to pump effluent over a long distance to the point of discharge</i> <i>• space for expansion – any site should have space to allow the expansion of the wastewater</i> <i>• treatment works in the future for the accommodation of growth</i> <p><i>Summary of Results of Community Involvement:</i></p> <ul style="list-style-type: none"> <i>• clarification is required of why a new Works needs good road access and what the definition of ‘good’ is</i> <i>• the relocation of the Works will fundamentally influence the ability to release the site for housing and other development. Support the criteria proposed, regard should also be had to visual</i>
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			<p><i>intrusion, biodiversity, natural and archaeological conservation and historic environment</i></p> <ul style="list-style-type: none"> • <i>Anglian Water supports the criteria. There are no operational reasons for the relocation, it is being driven by the redevelopment strategy for the Cambridge Northern Fringe. On this basis the relocation must be viable financially, including no requirement on Anglian Water's customers for funding, and not give rise to operational risk</i> • <i>Should be subject to appropriate level of environmental assessment, including the potential impact on archaeology</i> • <i>Release of this site is essential for long term regeneration of the area for housing and other uses.</i> • <i>Should add the importance of minimising impact on the community and local environment</i> • <i>The criteria proposed are appropriate</i> • <i>Must specify a specific site for relocation, a criteria-based approach would not be appropriate.</i> • <i>Further criteria should include visual impact, impact on Green Belt, the natural and built environment, including biodiversity, conservation and archaeology.</i> <p><i>Sustainability Appraisal:</i></p> <p><i>This Preferred Option relates to the identification and assessment criteria for potential sites for the relocation of the Milton Wastewater Treatment Works. The criteria set out in the MWDP, and those used to evaluate all potential allocations being considered for inclusion in the Site Specific Proposals DPD address the full range of potential effects on the sustainability appraisal objectives that may arise from the relocation of the wastewater treatment works. The potential effects of the relocated wastewater treatment works, on the selected site, have therefore been considered during the preparation of the Site Specific Proposals DPD and its accompanying SA Report.</i></p>
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			<p><i>Response:</i></p> <p><i>Following consideration of responses, it is concluded that the criteria should be refined as follows:</i></p> <ul style="list-style-type: none"> • <i>A site of 20 – 30 hectares to include landscaping areas</i> • <i>Good access from the existing highway network which would entail easy access from the A or B class road network</i> • <i>Avoiding the use of access for lorries through villages</i> • <i>Avoiding the need to access the site by way of a level crossing over the main line railway</i> • <i>Presumption against using land in the flood plain of the River Cam unless this can be achieved without the risk of pollution from flooding, extending the flooding pattern to additional areas and that the engineering feasibility of building subsurface structure and low relief buildings is not compromised</i> • <i>Having a stand-off of not less than 400 metres from residential property</i> • <i>Minimise the risk of residential property in the vicinity being in a ‘high risk’ area for exposure to any potential odours, given the direction of the prevailing wind</i> • <i>Use of land for the development and related infrastructure (e.g. pipeline) that would not prejudice the survival of any nationally protected nature conservation areas e.g. SSSIs</i> • <i>Ability of the site to minimise impact on the Green Belt by being able to support mitigation measures to minimise visual intrusion through land re-contouring and additional landscaping</i> • <i>Avoidance of any Schedule Ancient Monuments and to consider the risk to accommodating the development associated with any known areas of high archaeological potential</i> • <i>Relative proximity to the River Cam to allow efficient discharge of treated effluent</i> • <i>Proximate to the existing infrastructure to permit the efficient conveyance by pipeline to the new works.</i>
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			<p><i>The above criteria are specific to finding a location for a new wastewater treatment works. In addition to ensure all other relevant factors are captured and also to give consistency, it is considered that any site selection exercise should also consider possible sites against the generic site selection criteria being used to evaluate all potential allocations being considered for inclusion in this Plan.</i></p> <p>[Policy Text Starts]</p> <p><i>Preferred Option MW 15</i></p> <p><i>In order to facilitate the redevelopment of the Cambridge Northern Fringe (East), the Site Specific</i></p> <p><i>Development Plan Document will identify a site specific allocation for the relocation of the Milton Waste Water Treatment Works.</i></p> <p>[Policy Text Ends]</p> <p><u>Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals – Development Plan Document – Preferred Options (November 2006) - Pages 38 & 39 stated as follows:</u></p> <p><i>3.16 Relocation of Milton Waste Water Treatment Works</i></p> <p><i>3.16.1 Milton Waste Water Treatment Works lies in the eastern part of the Cambridge Northern Fringe lying between the A14 and the edge of Cambridge. The majority of the area, including the Milton Waste Water Treatment site, is in Cambridge City; and the remainder (mainly Chesterton Sidings) lies in South Cambridgeshire District.</i></p> <p><i>3.16.2 The Cambridge Northern Fringe (East) is a strategic area that has been identified for sustainable redevelopment, which requires the Waste Water Treatment Works to be relocated. The need to consider an alternative location for the Works arises from pressures for housing development in the Cambridge Sub-Region, and the consequential</i></p>
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			<p>proposals for redevelopment on the Cambridge Northern Fringe contained in the recently adopted Cambridge City Local Plan.</p> <p>3.16.3 The Core Strategy (MW15) states that:</p> <p><i>'In order to facilitate the redevelopment of the Cambridge Northern Fringe (East), the Site Specific Proposals DPD will identify a site specific allocation for the relocation of the Milton Waste Water Treatment Works.'</i></p> <p>3.16.4 The Site Specific Proposals DPD takes forward the provision of the Core Strategy by identifying a preferred site for the relocation of the Milton Waste Water Treatment Works. All sites considered have been subject to the Plan's site assessment process, and in addition site selection criteria, specific to the requirements of the potential new Waste Water Treatment Works have also been taken into account. These specific criteria, set out below, were refined through the Issues and Options consultation:</p> <ul style="list-style-type: none"> • A site of 20 – 30 hectares to include landscaping areas • Good access from the existing highway network which would entail easy access from the • A or B class road network • Avoiding the use of access for lorries through villages • Avoiding the need to access the site by way of a level crossing over the main line railway • Presumption against using land in the flood plain of the River Cam unless this can be achieved without the risk of pollution from flooding, extending the flooding pattern to additional areas and that the engineering feasibility of building subsurface structure and low relief buildings is not compromised • Having a stand-off of not less than 400 metres from residential property • Minimise the risk of residential property in the vicinity being in a 'high risk' area for exposure • to any potential odours, given the direction of the prevailing wind
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			<ul style="list-style-type: none"> • <i>Use of land for the development and related infrastructure (e.g. pipeline) that would not</i> • <i>prejudice the survival of any nationally protected nature conservation areas e.g. SSSIs</i> • <i>Ability of the site to minimise impact on the Green Belt by being able to support mitigation</i> • <i>measures to minimise visual intrusion through land re-contouring and additional landscaping</i> • <i>Avoidance of any Schedule Ancient Monuments and to consider the risk to accommodating</i> • <i>the development associated with any known areas of high archaeological potential</i> • <i>Relative proximity to the River Cam to allow efficient discharge of treated effluent</i> • <i>Proximate to the existing infrastructure to permit the efficient conveyance by pipeline to the new works.</i> <p>[Policy Text]</p> <p><i>Preferred Option SSP 15</i></p> <p><i>The following site, which is identified on the Proposals Map, is allocated for the relocation of the</i></p> <p><i>Milton Waste Water Treatment Works:</i></p> <p><i>Land at Honey Hill, Fen Ditton</i></p> <p>[End of Policy Text]</p> <p><i>3.16.5 Those sites that were considered but not preferred were:</i></p> <p><i>Milton Area of Search</i></p> <p><i>Milton / Landbeach Area of Search</i></p>
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			<p>Options (November 2006) [Consultation Document, Excludes Appendix C and D, attached below]</p> <ul style="list-style-type: none"> • The Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals – Development Plan Document – Preferred Options – Appendix C (Part 1) Site Profiles and Site Assessment Methodology & (Part 2) Issues and Options Proposals Maps (November 2006) [Consultation Document – See Site Profiles SS5-001, SS5-002, SS5-003 & SS5-004, (Pages 412-432)] • The Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals – Development Plan Document – Preferred Options – Appendix D Preferred Options Proposals Maps (November 2006) [Consultation Document – See Map 68 (Page 71)] <p>Further documentation can be provided if required by the Inspector.</p>
2.13	SCDC	<p>Emerging local plan and draft NECAAP</p> <p>On page 120 of Applicant Regard to Section 42 Consultation Responses [APP-167], the following comment is attributed to South Cambridgeshire District Council: 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</p>	<p>a) Not applicable to the County Council.</p> <p>b) Cambridgeshire County Council is the Minerals and Waste Local Planning Authority and allocates sites for Waste Water Treatment Plants. The Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021 is the current plan. The County Council therefore agrees with Cambridge City Council and SCDC that it would be inappropriate for the proposed WWTP to be within the scope of the emerging local plan or NECAAP.</p> <p>c) Yes, an application for a replacement WWTP could be determined under the TCPA 1990 regime. It would be made to and determined by the County Council in accordance with the TCPA and Planning and Compulsory Purchase Act 2004 applying the MWLP and any other material considerations.</p> <p>d) Yes, we consider the proposals consented under the DCO process can be reflected in a statutory development plan, even if an application would not be determined under the TCPA regime.</p>

		<p>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.</p> <p>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).</p> <p>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?</p> <p>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</p>	<p>e) See response to question 2.9 above.</p> <p>f) See response to question 2.9 above.</p> <p>g) - k) Not applicable to the County Council.</p>
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		<p>or safeguarding land for them, even if an application would not be determined under the TCPA regime?</p> <p>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?</p> <p>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.</p> <p>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</p>	
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		<p>WWTP, would you expect the draft NECAAP to be found sound and adopted? Would you progress the NECAAP in its current form?</p> <p>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?</p> <p>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?</p> <p>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?</p>	
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		<p>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?</p>	
2.18	Applicant, IPs	<p>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?</p>	<p>Cambridgeshire County Council is not aware of any DCO applications including those with which it has been involved in in recent years which have relied on housing need.</p>
2.19	Applicant, CCC SCDC	<p>Need – NPPW Para 7 of NPPW states that waste planning authorities should 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. a) Do you consider that a need should be demonstrated for the proposed WWTP; and b) Do you consider that the extent to</p>	<p>(a) If the development is not consistent with the Development Plan then national policy indicates that a demonstration of need would be required; In the context of an NSIP, as the Minerals and Waste Planning Authority the County Council’s comments focus on minerals and waste policies (see the list of relevant policies in the MWLP below in response to Q17.8 and detail of policy 11, the principal policy that would apply, in Q17.3 below) and defer to the Districts for their interpretation of their Local Plan policies. The County Council is not the decision maker for this DCO and in such circumstances it is not appropriate for it to place itself in the ExA and Secretary of State’s position but would only seek to assist the ExA and Secretary of State in directing it to matters which the County Council considers qualify as relevant and important matters under s 104 and 105 of the Planning Act 2008. The County Council considers the MWLP and Policy 11 are such relevant and important matters.</p> <p>b) In terms of the extent to which the operational capacity of the existing WWTP should be taken into account, the County would advise that as a starting point, it would be logical to establish if the capacity at the existing</p>

		<p>which the capacity of the existing operational facilities would satisfy the need should be taken into account?</p>	<p>site could assist in providing the necessary future capacity or be adapted to do so. However, as the relocation of the WWTP is intended to enable the redevelopment of the existing site and surrounding area, the County Council considers the ExA and the Secretary of State can determine on that basis the weight that should be given to the prospect of retaining and enhancing capacity at the existing facility balanced against the planned redevelopment of the area.</p>
2.25	Applicant, CCC, CCoC, SCDC	<p>Benefits 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</p>	<p>The timescale for submission and the extent of the benefits is considered to be for the applicant to respond to in the first instance. However, in response to what confidence could be given to the ExA that planning permission would be granted and the facility delivered, will ultimately depend on the proposal and an assessment against national and local planning policy and other material planning considerations.</p>

		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?	
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 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. 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</p>	CCoC considers other parties are better placed to respond to this question. However, as evidenced as part of the Council's issues and options and preferred options work set out in response to 2.9 above, the criteria required by Anglian Water for any new site, meant that land in the Green Belt would be required.

		<p>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</p>	
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		<p>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>	
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		<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>	
2.29	Applicant, CCoC	<p>Site selection – scope In the Consultation Appendix Site Selection Report [APP-179] the following is stated: 4.2.1 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</p>	<p>a) With regard to buffer zones Policy 16 of the MWLP refers to buffer zones of less than 400m from existing dwellings normally occupied by people (see paragraph 6.6 of the MWLP). The policy would require an odour assessment demonstrating that the proposal is acceptable, with appropriate mitigation in such circumstances.</p> <p>See Additional Submission by CCoC at Deadline 1 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (adopted July 2021).</p>

		<p>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.</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): 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</p>	<p>b) The buffer zone is relevant to the odour assessment only.</p>
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		<p>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.</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'</p>	
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		<p>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>	
2.32	Applicant, CCC, CCoC	<p>Housing development around the existing WWTP Statement of Requirement [APP-201] para 10 states that 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</p>	CCoC considers other parties are better placed to respond to this question. Details in relation to M&WLP Policy 16 is provided in response to 2.29 above.

		<p>to waste water treatment plants would preclude it from allowing such a scenario to happen.</p> <p>Para 11 goes on to state that: A safeguarding area of 400 metres exists around all waste water treatment plants in Cambridgeshire and Peterborough. Where new 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.</p> <p>Similarly, ES Chapter 3 [AS-018] states 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</p>	
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		<p>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</p>	
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		<p>would be uneconomic. There was no partial solution which could sustain HIF support (para 1.2.6).</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 in situ 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,</p>	
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		<p>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>	
Air quality			
4.4	Applicant, CCoC	Heavy duty vehicle (HDV) movements – clarification	The figures used in the Transport Assessment have been agreed with The Applicant. It is normal for the Transport Assessment flows, and the

		<p>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.</p> <p>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?</p>	<p>flows used in the environmental assessment in chapter 7 (air quality impacts) to match each other and is a sound basis for the assessment.</p> <p>For air quality comments please refer to the answer to question 4.5 below.</p>
4.5	CCoC	<p>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</p>	<p>Notwithstanding that in ES Chapter 7: Air Quality [APP-039], concludes the effect on air quality is not significant, Cambridgeshire County Council would encourage the Applicant to minimise the impact by including in the Air Quality Management Plan a statement to operate a minimum of EURO VI for it's own fleet and incorporate a condition limiting access to the site to minimum EURO VI for contractors and subcontractors. This could include on-site equipment to a minimum standard of EURO VI or alternative Fuels, such as LNG. This would complement and support the accompanying Climate Resilience and Carbon mitigations as part of the application as well as the Applicant's Net Zero Strategy to 2030. This is included in our LIR in the Traffic and Transport section.</p>
<p>Biodiversity (Note the local authorities worked together to provide answers to the following questions related to Biodiversity. These are captured in each local authorities submission.)</p>			

5.13	Applicant, NT, Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire (WTBCN), CCoC, CCC, SCDC	<p>Impacts from recreational pressure on Stow-cum-Quy Fen SSSI</p> <p>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)?</p>	The proposed wording set out in NE's RR [RR-015] would adequately address the County Councils concerns regarding impacts from increased recreational pressure on Stow-cum-Quy Fen SSSI.
5.14	NE, EA, NT, CCC, CCoC, SCDC, WTBCN	<p>Comments on updated information submitted by the Applicant</p> <p>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-</p>	<p>The County Council welcomes the additional information provided by the applicant, which provided additional details in respect of biodiversity. However, the documents do not fully address the County Council concerns regarding securing successful implementation of proposed mitigation.</p> <ol style="list-style-type: none"> 1. Draft Construction Environmental Management Plan [AS-057]. The Environment Management Measure – Ecology and Nature Conservation table 4-13 only contains 1 entry. It is therefore not clear how other mitigation measures to protect biodiversity during construction will be implemented through the draft CEMP. The draft CEMP does refer to section 7.2 of CoCP Part A [APP-068]. However, the County Council still have concerns that the CoCP Part A doesn't cover all aspects of biodiversity mitigation set out in ES Chapter 8 [AS-026]/[AS-027]. 2. Code of Construction Practices – Part B Section 3.1 of the CoCP Part B [AS-161]. This does not explain how damage to River Cam habitats / BNG River units will be dealt with as part of the outfall works to the River Cam. The County Council would expect that

		<p>125]; and the Preliminary Ecological Appraisal [AS-072].</p>	<p>a Biodiversity Net Gain (BNG) Plan for river units would be produced and off-site BNG river units would be secured prior to the commencement of works at the outfall. This should form part of the Outfall management and Monitoring Plan (OMMP) to be provided as part of Requirement 10 in the DCO [AS-139] (as discussed below).</p> <ol style="list-style-type: none"> 3. The Outline Outfall Management & Monitoring Plan [AS-073]. The Applicant has chosen to deliver BNG for river units through the OMMP but this has not been integrated adequately in the OMMP. The outline OMMP [AS-073] proposes to consider BNG provisions at the operational stage. This is not considered appropriate. BNG should be incorporated into the details design stage, to allow maximum on-site BNG and to secure off-site BNG (if needed). Therefore, the OMMP should require the production of a BNG Plan (for river units), including purchasing off-site BNG credits, within the pre-commencement works. The monitoring scheme for the operational phase (Table 5-2) does not appear to include monitoring of the River Cam County Wildlife Site, such as the impact of scour / impact on banks / spreading of invasive species, nor on the BNG scores associated with this river. It will be important that any remedial works (such as addressing scour) to the River Cam fully incorporate any ecological mitigation. 4. Lighting Assessment Report [AS-100]. This document has not been updated to refer to the most recent mitigation guidance for bats and lighting: ILP and Bat Conservation Trust Guidance Note 08/23 Bats and Artificial Lighting in the UK, Bats and the Built Environment series (Bat Conservation Trust & ILP, 2023). 5. Biodiversity Chapter 8 [AS-026]. At row 3, page 232 - direct / indirect impacts to bats: it is stated that there will be “use of maximum height lighting columns of 5m within the proposed WWTP”. However, it does not appear to recognise that there will be lighting positioned 8-10m above ground level within the Cambridge WWTP, as set out in Appendix A of the Lighting Design Strategy [APP-071]. The Detailed Lighting Design should
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			comply with the latest Guidance Note 08/23 – Bats and Artificial Lighting, rather than the 2018 version (as discussed above).
5.16	CCoC	<p>Impact on protected species 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>	<p>Cambridgeshire County Council is satisfied that the proposed update to the water vole licence, along with the submission of a draft Outfall Management & Monitoring Plan [AS-073], addresses previous concerns regarding water vole mitigation.</p> <p>Cambridgeshire County Council's concerns regarding foraging / commuting bats relate to a lack of detail contained within Lighting Design Strategy [APP-072] for both the construction and operational phase. In addition, the Council is concerned that there will be an adverse impact on bats during the operational phase (short-term) as a result of lighting spill onto the railway corridor, until the landscape scheme has matured. This has not been addressed through Natural England's proposed changes to method statement.</p> <p>The Council seeks an update of the Lighting Design Strategy to ensure:</p> <ul style="list-style-type: none"> (a) compliance with the latest ILP Guidance Note 8/23; (b) greater detail within Objective 6 (paragraph 4.2.18) to demonstrate how wildlife will be protected (e.g. otters / bats during construction & bats during operation). (c) preservation of a dark corridor along the disused railway. <p>During discussions with the Applicant, early planting was also discussed as a way to minimise impacts on the railway corridor.</p>
5.21	Applicant, NE, CCoC, CCC, SCDC	<p>Introduction of reed bed system at the proposed outfall 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</p>	The County Council agrees with EA's proposal and has no further comments.

		comments or concerns regarding this suggestion?	
5.39	NE, WTBCN, CCoC, CCC, SCDC	<p>Effects - habitats</p> <p>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)?</p>	<p>1. Terrestrial habitats The County Council agrees that the scheme will deliver a moderate benefit for terrestrial habitats, which is demonstrated by the delivery of on-site BNG score of 20% BNG (for both area-based and linear habitats).</p> <p>2. Veteran trees The County Council considers that the only potential exception is veteran trees located along the access roads, which to date have been omitted from the Tree Protection Plan [APP-102] and not referenced within the CoCP Part A [APP-086]. It is therefore unclear whether suitable protection measures will be adopted during the construction phase.</p> <p>3. River habitats The ability of the scheme to deliver moderate benefits for river habitats will be reliance on:</p> <ul style="list-style-type: none"> i. detailed modelling of the outfall to ensure there will be no adverse impacts of scouring on the River Cam ii. designing a scheme for the outfall works / works to area 32 that will deliver on-site BNG river units and securing off-site BNG river credits (to address the shortfall) <p>These will need to be secured in the County Councils view as part of the planning requirement 10 (Outfall) and planning obligations (for BNG).</p> <p>As set out in the County Councils response to 5.1.14, the draft OMMP [AS-073] also needs to provide better information about how scouring of River Cam will be dealt with.</p> <p>Currently, DCO requirement 10 [AS-139] only requires BNG to be addressed as part of the detailed operational management and monitoring plan, which is considered too late, and should be addressed as part of detailed construction (prior to commencement of works).</p>

			Therefore, the County Council recommends the wording of draft DCO requirement 10.2 be updated, so that the detailed construction outfall management and monitoring plan includes a BNG Plan for rivers and purchasing of off-site BNG credits.
5.41	WTBCN, CCoC, CCC, SCDC	<p>Protection of reptile species 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>	<p>The County Council is concerned that insufficient consideration has been given to the proposed translocation methodology for the reptiles. Of particular concern is that the animals may be double handled as a result of other development being undertaken / likely to be undertaken around Waterbeach barracks. This would result in unnecessary adverse impacts to the reptiles.</p> <p>The County Council therefore is not satisfied that the outline Reptile Mitigation Strategy (ORMS) contained in paragraphs 7.2.26-7.2.29 within the CoCP Part A [APP-086] is sufficient to ensure reptile species would be protected and considers that the ORMS should be expanded to include details of the proposed translocation process, including locations of the proposed receptor sites. And more specifically, to confirm that areas associated with future development will be avoided, such as Waterbeach New Town.</p> <p>The County Council at this time cannot agree that the Applicant has shown that the impact on reptiles directly and on their habitats from construction is neutral</p>
Carbon emissions and climate change mitigation and adaptation			
6.5	Applicant, CCoC	<p>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</p>	<p>CCoC requests the following clarifications from the applicant regarding ES Appendix 10.1 GHG Calculations [APP-109]:</p> <ul style="list-style-type: none"> • 2.1.4 Is there a typo here? There must be more than 2 panels. 3600 kW must be the total capacity? • 2.3.2 and Table 2-8: it looks like the UK average grid electricity emissions factor forecast for 2028 has been used. This only shows what emissions will be in year 1 of operation so is not suitable for assessing overall emissions from the project, especially if emissions would vary from year to year. The same

		required and suitably address this matter.	<p>applies to Table 2-10 and 2-12. It would be helpful to make clearer in the titles that these are only for year 1. (However, we note that this issue of gradual decarbonisation of the electricity grid is addressed later though, in 2.7.1, Table 2-15, and Tables 2-17, 2-18 and 2-19.)</p> <ul style="list-style-type: none"> • Table 2-8 and 2-10 – it would be useful to total the kWh of power consumption as well as the carbon emissions. • Table 2-16 has rows that state ‘gross annual emissions’ and ‘net annual emissions’ but the figures given are lifetime emissions, not annual.
6.11	CCC, CCoC, SCDC	<p>Baseline carbon emissions 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>	<p>Cambridgeshire County Council officers consider that the baseline carbon emissions presented by the applicant is not representative of existing conditions.</p> <p>Firstly, for the construction phase, the Applicant puts forward a baseline of “a pre-value-engineered view (based on 2010 construction practices and baseline models)”. The Council’s view is that the baseline for construction ought properly to be zero, since without the development, no construction would take place.</p> <p>For operational emissions, the Applicant has not presented any baseline, but the Council’s view is that the most suitable baseline would be the current operational emissions of the existing Cambridge WWT plant, given that the proposal is for a relocation, such that the new plant is a direct replacement for the existing one, albeit at a different location.</p> <p>This is significant, because the Applicant’s treatment of the baseline (without development) scenario makes a material difference to the net change in emissions resulting from the development, compared to without the development.</p>
6.44	CCC, SCDC, CCoC	<p>Carbon Management Plan Please review and provide comments on the acceptability of the outline Carbon Management Plan [AS-076].</p>	See the County Council’s LIR submitted at Deadline 1.

Community			
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>	<p>The draft Active Travel Strategy for Cambridgeshire sets out the County's ambition for active travel. Policy AT04 prioritises active travel in new developments which has been considered with the applicant. Policy AT07 details that new highway schemes must consider active travel. This has been considered with the applicant for the works on the B1047. Policy AT10 considers improving existing walking and cycling provision and policy AT15 seeks improvement to the rights of way improvement plan - these have both been considered with the applicant. AT20 cycling and walking in rural areas has also been considered with the applicant.</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>	<p>A number of Public Rights of Way (PROW) are impacted by the construction of the proposed development, as shown on the Rights of Way Plans ('ROW Plans') [APP-020]. A series of localised PROW diversions are required while temporary closures are in place. Although the Construction Traffic Management Plan ('CTMP') [APP-148] makes limited reference to how these temporary closures and diversions will be managed, more detail is given in the Code of Construction Practice: Part A ('CoCP A') [APP-068]. CCoC is concerned that the proposal at paragraph 7.6.14 of the CoCP A, to use safety gates across PROW that are undergoing works, may represent an off-putting visual barrier to PROW users. Paragraph 7.6.15 of the CoCP A also mentions that PROW may be temporarily stopped up where it is not possible to implement a temporary diversion. CCoC is concerned about the impact this could have on users of the local PROW network and their enjoyment of the surrounding environment. Temporary closures should only be deployed as a last resort and must be agreed with the local highway authority LHA.</p> <p>CCoC is keen to ensure that no PROW closures or diversions are unnecessarily circuitous, or are in place for longer than is necessary. In order to safeguard against this, the DCO should include a requirement for the CTMP and the CoCP to be approved by the local</p>

			<p>highway authority ('LHA') prior to the commencement of any works on the proposed development. Without such a mechanism the LHA appears to have limited means to influence the changes that are undertaken on its highway network and is reliant upon consultation from the relevant Local Planning Authority. However, as these documents do have direct impact on the highway network, CCoC feels that the LHA should have a direct role in their approval.</p> <p>CCoC further notes that the proposed temporary diversion to Footpath 85/6, shown on Sheet 2 of the ROW Plans, appears to be approximately 500m in length. The indicated diversion moves users away from the river bank and includes a ~150m stretch running closely parallel to the A14 dual carriageway. These factors clearly have the potential to impact the public's enjoyment of the affected PROW.</p> <p>The proposed temporary diversion to Footpath 85/6 should be considered in discussion with the LHA, to explore whether an alternative, less circuitous diversion route could be provided.</p> <p>Paragraph 7.6.18 of the CoCP A references the restoration of affected PROW to their pre-commencement condition, or to a standard acceptable to the local highway authority. CCoC can see no explanation of how the restoration of particular pre-development conditions would be ensured by the Applicant.</p> <p>The CTMP or CoCP A should include a requirement for pre- and post-construction surveys to be undertaken on the affected PROW, to a methodology agreed with the LHA, so that restoration works can be carried out to an established standard. Restoration of PROW must ensure that the full legal width is restored. Provisions should be made to ensure the right of the LHA to inspect works to PROW.</p> <p>A programme detailing the proposed timing and duration of temporary PROW closures and diversions should be agreed with the LHA prior to the commencement of any work on the PROW network. This requirement is in accordance with CCoC's standard provisions for the undertaking of street works within PROW. The requirement to do this should be included in either the CTMP or CoCP A, and, as noted above, the approval of these documents by the LHA should be a requirement of the DCO. Any programme that is supplied should</p>
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			<p>incorporate details of a signage strategy to inform PROW users about the changes that may be taking place on the affected parts of the network, including in relation to PROW that may be subject to the use of safety gates whilst works are ongoing.</p> <p>Parish councils and local and statutory user groups (as well as the LHA) should be included as part of the communication to local residents and businesses mentioned in paragraph 7.6.17 of the CoCP A.</p> <p>The LERMP [AS-066] references horse-riding routes (para 3.5.11), including connectivity to the B1047, but does not promise the provision of equestrian access improvements over the A14 bridge on the B1047. CCoC has represented in its LIR that creating this link for equestrians is considered a valuable addition to the local network, and it would have the benefit of expanding the circular travel opportunities for equestrians by connecting to the forthcoming Horningsea Greenway.</p> <p>Paragraph 3.5.18 of the LERMP [AS-066] does not include the potential to provide enhanced crossing features for equestrians wishing to cross Horningsea Road to the north of the B1047/A14 junction. As noted in response to question 1.14, the GCP is delivering a 'Greenway' along the B1047 between Fen Ditton and Horningsea, which will open up the existing non-motorised user (NMU) facility on the west of the road to use by equestrians. This presents an opportunity for improved crossing facilities at the junction of Low Fen Drove Way with Horningsea Road, which would provide enhanced connectivity to the Applicant's proposed new bridleway leading towards Stow cum Quy.</p> <p>A "new bridleway" is referenced at several different points of the LERMP [AS-066]. CCoC anticipates this route becoming a public right of way, rather than a permissive path. The proposed bridleway forms an essential part of the mitigation for the development and therefore should be enshrined as a public right of way. Paragraph 3.5.17 references that access to this bridleway would be regulated through use of gates and signage – this is not acceptable for a PROW, where access should be unrestricted. The width, surface and boundary</p>
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			<p>treatment of a newly created public bridleway would also need to be agreed with the LHA.</p> <p>The LERMP [AS-066] also does not include any measures detailing the management of PROW during the operational phase of the proposed development. CCoC anticipates that any new PROW created by the undertaker will become highways maintainable at public expense (subject to the LHA's certification that such new PROW have been satisfactorily delivered) upon their completion, or the completion of the whole development – whichever is agreed to be most appropriate. As a result of this, there will be no requirement for the undertaker to maintain them. CCoC wishes to point out that PROW which are subject to temporary closure for construction purposes should be subject to pre-condition surveys, to be agreed with the LHA, and must be restored to an equivalent or better condition than that which preceded development. The management of the new permissive paths proposed by the Applicant in the vicinity of the proposed WWTP is a matter for the Applicant as the intended landowner, and CCoC does not at this time have specific requirements in relation to their management.</p>
7.39	CCC, SCDC, CCoC	<p>Equalities Impact Assessment (EqIA)</p> <p>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 PSED?</p>	<p>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. Therefore, the EQIA has not adequately assessed the impacts and therefore any mitigation required for the Gypsy and Traveller population.</p>
Compulsory Acquisition (CA) and Temporary Possession (TP)			
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	We are not aware of any inaccuracies.

		Land Plans [AS-151]? If so, please set out what these are and provide the correct details.	
8.20	Applicant Cadent Gas Limited, Network Rail Infrastructure Limited, National Highways, CCoC, Conservators of the River Cam	<p>To Statutory Undertakers (and others subject to protective provisions): 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>	<p>CCoC as local highway authority (LHA) is currently engaged in discussions with the Applicant regarding the detail of protective provisions in the dDCO. In summary, the current protective provisions are not considered to offer sufficient protection to the LHA and the potential insertion of amended protective provisions, or alternative means for protecting CCoC's interests, are under consideration with the Applicant.</p> <p>The Highway Authority has a well established procedure (including instructions, written specifications, AutoCAD drawings and financial processes) for dealing with applications under Section 278 of the Highways Act 1980.</p> <p>The use of S278 of the Highways Act 1980 provides the Highway Authority with a suitable level of protection for the public at large, while being open and transparent to both parties. It also allows flexibility within the design of any works to accommodate unforeseen circumstances.</p> <p>The vast majority of the proposed access works can be undertaken within the context of the Highway Authority's 'short-form' S278 which does not require any additional legal procedures. The Highway Authority would of course be prepared to consider any scheme specific requirements from the applicant following a legal review.</p> <p>The applicant is entering into a Framework Agreement for a similar scale of works in the east of Cambridgeshire and this could serve as a model for undertaking the proposed scheme.</p>
Draft Development Consent Order (dDCO)			

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?	CCoC in its capacity as public health authority have no particular view regarding timescales. Note CCoC has raised some concerns regarding security of the site and decommissioning in it's Relevant Representation [RR-001] and LIR submitted at Deadline 1.
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?	<p>CCoC are the Minerals and Waste Local Planning Authority for this waste management development. As such is the relevant planning authority. This should be reflected in the DCO which currently defines the relevant planning authority as the district councils.</p> <p>In order to allow appropriate consideration of the material submitted for each requirement the County Council considers that reference should be made to the inclusion of consultation with the District Councils and others. CCoC is of the view a minimum time period of 12 weeks should be stated in the DCO to allow for consultation, subject to any necessary extension of such period to be agreed with the Applicant.</p>
Green Belt			
11.6	Applicant, CCoC, CCC, SCDC	<p>Existing WWTP</p> <p>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</p>	CCoC considers other parties are better placed to respond to this question, albeit we note as part of Requirement 9 a Detailed Decommissioning Plan to be submitted for approval.

		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?	
Health			
12.4	CCoC	<p>Mental Wellbeing Impact Assessment In your RR [RR-001] you state 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. Does Revision 02, September 2023 [AS-077] addressed your concerns?</p>	<p>Whilst some concerns have been addressed by the additional submission [AS-077] there remain the following concerns on the County Council's part:</p> <ul style="list-style-type: none"> • Firstly, we are concerned about: <ol style="list-style-type: none"> 1. the finding in Table A.3: that there is <i>Not enough information on deprivation to draw relevant conclusions or recommendations</i> 2. the need to clarify whether there is any contradiction on the matters of any disproportionate impacts on people with protected characteristics. Text below next bullet refers. • Secondly, we are concerned that the presence and potential impacts of the substantial vent pipe that would be left on the vacated site (the site potentially designated for housing use), does not appear to have been included in the scope of the assessment. <p><i>On the Race and ethnicity, MWIA Key question</i></p> <p><i>Will the proposal impact differentially on different ethnic groups, including refugees, asylum seekers and newly arrived communities?</i></p>

			<p>Table A.2: Population Characteristics: Risk and Protective factors for mental well-being, identifies for <i>Likely impact? Positive, negative, indirect?</i> States that:</p> <p><i>The proportion of ethnic minorities in the study area are higher than the proportions in East Cambridgeshire, South Cambridgeshire and East of England. Construction work may adversely affect air quality, visual landscape, and perceptions of safety and security. However, adverse effects disproportionately impacting people with protected characteristics are unlikely due to the application of best practice mitigation measures. The dDCO Requirement 8 & 9 requires the implementation of the Code of Construction Practice (CoCP)</i></p> <p>Whereas,</p> <p>in Table A.3: <i>Wider determinants at a socio-economic and environmental level MWIA question: How does the proposed development impact on the wider determinants? Under the heading Likely impact? Positive, negative or is it an indirect impact? Select those most important it is stated that:</i></p> <p>Challenging discrimination: there may be indirect negative impacts during construction which disproportionately impact ethnic minorities, older people and those with disabilities or long-term health conditions.</p> <p>Comments or recommendations identified there include</p> <ul style="list-style-type: none"> • A requirement within section 3 of the CoCP Part A and B (Appendix 2.1 and 2.2, App Doc Ref 5.4.2.1 and 5.4.2.2) Part A (Community & stakeholder Engagement) to appoint a Community Liaison Officer responsible for ensuring that relationships and lines of communication are maintained throughout the construction period including communication of changes to access – Section 5.2 (Temporary access points and construction
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			<p>road signage) which requires the use of temporary signage along all proposed construction haul roads. As a minimum this will include internal haul road speed limits, warning (hazard signs), potential vehicle or pedestrian crossing points and distances to destinations.</p> <ul style="list-style-type: none"> • Alternative routes will be in place during construction and no permanent changes should limit significance of any impeded access to high quality public services. • Not enough information on deprivation to draw relevant conclusions or recommendations.
Historic environment			
13.1	Historic CCoC, SCDC	England, CCC,	<p>Assessment 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> <p>CCoC are satisfied with the heritage assessment and effects reported in ES Chapter 13 [AS-030].</p>
13.17	Historic CCC, CCoC	England, SCDC,	<p>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]?</p> <p>Areas where archaeological excavation will be required can be identified from the results of the evaluation. The nature of the archaeology is dispersed, generally unenclosed, prehistoric settlement activity and therefore the extent of any proposed mitigation areas are uncertain and necessarily imprecise. Flexibility should therefore be built into the Archaeological Mitigation Strategy to allow for variations to the scope of works during the mitigation phase.</p>
Landscape and visual			

14.1	CCC SCDC CCoC	<p>Assessment Please confirm whether you are satisfied with:</p> <ul style="list-style-type: none"> a) the study area; and b) the viewpoint (VP) / photomontage locations selected, as identified within ES Chapter 15: Landscape and Visual Amenity [AS-034]. <p>If not, please explain the reasons for this.</p>	<p>CCoC does not have the relevant expertise to respond to this question. CCoC has commented upon Landscape and Visual Amenity within its LIR as it relates to the impact for users of public rights of way.</p>
14.2	CCC, SCDC, CCoC	<p>Assessment Please confirm whether you are satisfied with:</p> <ul style="list-style-type: none"> 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. 	<p>The Applicant notes that in many of the locations considered as part of the Landscape and Visual Amenity assessment, the landscape will become less open and more wooded. After 15 years of operation, the screening planting will not completely shield receptors from the larger structures within the WWTP. Even where these impacts are only assessed to be slightly adverse, it is clear that the changes (both the structures and the vegetation) will be long-lasting and will alter receptors' impression of the landscape. In the most impacted locations, this change could potentially diminish users' enjoyment of the affected PROW and NMU facilities and may discourage participation in active travel. This is raised in the CCoC LIR.</p>
Land quality			
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>	<p>CCoC has not identified any monitoring required for the purposes of land quality.</p>

15.10	CCoC, SCDC	CCC, 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?	<p>The County Council has set out in its Local Impact Report Chapter 9, Land Quality and Contamination a description of the relevant policies in the Minerals and Waste Local Plan.</p> <p>The development is partially located on areas identified as a Chalk Mineral Safeguarding Area and a Sand and Gravel Mineral Safeguarding Area as depicted on the Cambridgeshire and Peterborough Minerals and Waste Local Plan Policies Map. This indicates that in those areas there may be a chalk or sand and gravel mineral reserve in those areas. The Sand and Gravel Mineral Safeguarding Area is largely affected by the proposed pipeline from the development to Waterbeach, and the Chalk Mineral Safeguarding Area by the main facility itself. Development will sterilise these resources.</p> <p>It is noted the Applicant is proposing to make use of excavated material within the project itself, which is supported.</p> <p>It is also worth noting the proposed development does fall within the Consultation Areas as defined under Policy 16: Consultation Areas (CAs) of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) for the following safeguarded facilities:</p> <ul style="list-style-type: none"> • Cambridge Water Recycling Centre • Cambridge Northern Fringe Aggregates Railhead • Cowley Road Waste Management Area (Waste Transfer Station) <p>The Council is content that the proposed development is unlikely to affect the Aggregates Railhead or the Waste Transfer Stations. In addition although the existing Cambridge Water Recycling Centre is safeguarded under MWLP Policy 16 – the proposal is for the relocation of this facility. In that event should it be constructed the existing facility will no longer be required. Consequently, the proposal, in this specific context, whilst not</p>
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			meeting the letter of the policy, which requires that the development “not prejudice the existing or future use of the area for this the CA has been designated”, does meet the spirit and intent of the policy which is to ensure that there is adequate waste management provision.
15.13	CCoC, CCC, SCDC, EA	<p>Review of additional information provided by the Applicant in response to ExA’s Procedural Decision</p> <p>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 29th September 2023 from the Applicant.</p>	Documents AS-089 to AS-098 are updates to various reports relating to ground conditions, including geophysical and geoenvironmental assessments. Document AS-032 has been consequently updated to reflect these updates. The County Council has no additional comments in light of the additional submissions.
Major accidents and disasters			
16.6	Applicant, CCC, SCDC, CCoC	<p>Planning policy</p> <p>Para 1.3.4 of ES Chapter 21 [AS-042] introduces local policy by noting that Local planning policies of relevance to the Proposed Development includes: [...]</p> <p>a) Are there any other policies that should be taken into account which are not listed in this chapter of the ES?</p> <p>b) Are there any emerging local policies that you consider to be potentially Important and Relevant?</p>	<p>The Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) (MWPL) does not contain any specific policies in relation to major accidents, disasters, or major hazards. Most MWLP policies such as Policy 22: Flood and Water Management, which may be indirectly relevant, are considered under their respective topics in the Environmental Statement.</p> <p>Policy 25: Aerodrome Safeguarding may be relevant. The topic of Aerodrome Safeguarding is referred to and solution proposed on page 18 of AS-042.</p> <p>The Cambridgeshire and Peterborough Minerals and Waste Local Plan is not currently under review. There are no emerging minerals and waste policies at this time.</p> <p>Policy 25: Aerodrome Safeguarding</p>

		<p>c) Are there any Neighbourhood Plan or Minerals and Waste Local Plan policies that you consider to be potentially Important and Relevant?</p> <p>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?</p>	<p>Mineral and waste management development within aerodrome safeguarding areas will only be permitted where it can be clearly demonstrated that the development would not constitute a significant hazard to air traffic. Where it cannot be demonstrated, or where the significance of any hazard is uncertain, the proposal will be refused.</p> <p>Where bird strike is an identified potential hazard, then the preparation and implementation of an approved Bird Management Plan may be required.</p>
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 An Operational Traffic Management Plan would be prepared post consent in relation to the management of operational traffic movements and that 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.</p>	<p>The County Council in its capacity as the Local Highway Authority seeks the exclusion of certain routes form part of the DCO. This would prevent the use of certain routes through villages from the outset.</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 (inter alia) that there are safe routes for all types of vehicles serving the proposed WWTP site?	
Material resources and waste			
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: 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:</p> <p>(a) it incorporates proposals for the sustainable use of soils (whether that be off-site or as part of an agreed restoration scheme); and</p> <p>(b) (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.</p>	<p>a) With regard to the issue of need, the County Council highlights Policy 11 of the Cambridgeshire and Peterborough Minerals and Waste Plan (MWLP) in its LIR. This policy states that proposals for new water recycling capacity or proposals required for operational efficiency, whether on Water Recycling Areas or elsewhere (with such proposals including the improvement or extension to existing Water Recycling Centres; relocation of Water Recycling Centres; provision of supporting infrastructure (including renewable energy); or the co-location of Water Recycling Centres with other waste management facilities) “will be supported in principle, particularly where it is required to meet wider growth proposals identified in the Development Plan”.</p> <p>b) CCoC has not got the specialism to be able to advise on the differences between grades 3a and above.</p> <p>c) CCoC considers the question is best addressed through the text of the Policy 24 which states the following:</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>

		<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> <p>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’.</p>	<p><i>(a) ...; and (b) (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> <p>[End of Extract]</p> <p>Policy 24 requires that where development affects Best and Most Versatile land (as defined in the National Planning Policy Framework) it should be demonstrated that there is an absence of suitable alternative using a lower grade of land. The wording of Policy 24 has an inbuilt preference that development should be located on the lowest grade of land possible, at least whilst the development is located on Best and Most Versatile Land. For example, if a development was proposed on Grade 1 land, then it should demonstrate that there were no suitable sites on land which is at a lower grade, i.e. Grade, 2, 3a, 3b, 4, 5 or non-agricultural land. If it was located on Grade 2, then the lower grades would be 3a, 3b, 4, 5 and non-agricultural land. The Policy, and consequently, the preference for lower grade sites no longer applies if the development is not located on Best and Most Versatile Land (Grades 1, 2 and 3a).</p>
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		<p>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 lowergrade BMV land?</p> <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>	
17.5	CCC, SCDC, CCoC	<p>Policy – NPSWW Para 4.14.5 of NPSWW states that The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a Site Waste Management Plan. 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</p>	CCoC consider that this can be part of CEMP and details can be dealt with under Requirement 9 of the DCO.

		with such detail under R9 of the dDCO.	
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>	<p>Noting in ES Chapter 16 [APP-048], para 1.3.14 listing the relevant M&W Local Plan policies, we would also add policy 26.</p> <p><i>In our Local Impact Report we identify the following policies from the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) as being relevant to the proposal:</i></p> <ul style="list-style-type: none"> • <i>Policy 1: Sustainable Development and Climate Change</i> • <i>Policy 5: Mineral Safeguarding Areas</i> • <i>Policy 11: Water Recycling Areas</i> • <i>Policy 17: Design</i> • <i>Policy 18: Amenity Considerations</i> • <i>Policy 20: Biodiversity and Geodiversity</i> • <i>Policy 21: The Historic Environment</i> • <i>Policy 22: Flood and Water Management</i> • <i>Policy 23: Traffic, Highways and Rights of Way</i> • <i>Policy 24: Sustainable Use of Soils</i> <p><i>In Section of the Local Impact Report relating to Chapter 16: Material resources and Waste we identify the following as relevant to that section.</i></p> <ul style="list-style-type: none"> • <i>Policy 24: Sustainable Use of Soils</i> • <i>Policy 26: Other Development Requiring Import of Material</i> • <p><i>Policy 26 would only become relevant if the proposed development required the importation of inert material, which as it is currently understood is not occurring.</i></p>
Noise and vibration			
18.17	CCoC, SCDC	CCC,	<p>Working hours</p> <p>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</p>
			CCoC does not have the relevant expertise to respond to this question.

			impacts which may be generated in relation to noise and vibration to nearby sensitive receptors?	
18.21	CCoC, SCDC.	CCC,	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?	CCoC does not have the relevant expertise to respond to this question.
18.30	CCC, SCDC	CCoC,	Further assessment Do you consider the proposed noise and vibration management plan, which would be required by R9 of the dDCO [AS139], 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?	CCoC does not have the relevant expertise to respond to this question.
18.31	CCC, SCDC	CCoC,	Review of additional information submitted by the Applicant Please review and comment on the acceptability of the draft Construction Environmental	CCoC does not have the relevant expertise to respond to this question.

		Management Plan [AS-057] in relation to noise and vibration.	
Odour			
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?	CCoC does not have the relevant expertise to respond to this question.
19.7	Applicant, EA, CCC, CCoC, SCDC.	Data ES Chapter 18 [APP-050] states in the summary that 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. 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?	The County Council does not have specialisms in environmental health to comment on odour and therefore defers to appropriate public bodies.
19.13	E A, CCC, CCoC, SCDC	Assessment The IAQM 2018 guidance on assessing odour impacts for	The County Council does not have specialisms in environmental health to comment on odour and therefore defers to appropriate public bodies.

		<p>planning, in Appendix A1.2.2 states that a qualitative riskbased 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?</p>	
19.15	CCC, SCDC	CCoC, 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?	The County Council does not have specialisms in environmental health to comment on odour and therefore defers to appropriate public bodies.

Traffic and transport			
20.4	Applicant, CCoC	<p>TA In CCoC's note at page 283 of 554 of the TA [AS-108] it is stated by CCoC that 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.</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>	<p>a) See Appendix 1</p> <p>b) Yes, we are 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, it was clear early on that the flows on the A10 and other local roads in that area, relating to construction, would be much lower than the flows relating to the WWTP.</p>
20.13	Applicant, SCDC, CCoC	<p>Policy – local Is the Proposed Development a development with 'significant transport implications'</p>	<p>Whilst there are local impacts as detailed in the CCoC LIR submitted at Deadline 1. CCoC considers the development is not a development with 'significant transport implications' in overall terms. This is because it relates to the relocation of an existing facility and so the transport and</p>

		according to Policy TI/2: Planning for Sustainable Travel of the South Cambridgeshire Local Plan 2018?	trip generation implications are not as significant as many new key strategic sites such as a new town or a large-scale commercial development.
20.14	CCC, SCDC, CCoC	<p>Policy – local</p> <p>a) Is the Applicant’s summary of applicable adopted and emerging local policy complete?</p> <p>b) Are there any other policies that should be taken into account?</p> <p>c) Should any of the policies noted by the Applicant be disregarded?</p>	<p>It is assumed this question refers to AS-038, (ES Chapter 15, Landscape and Visual Amenity), in that context, with regard to CCoC adopted plans the document correctly refers to the Minerals and Waste Policy 23: traffic, highways, and rights of way.</p> <p>For a full list of policies, these are included in the local authorities LIR’s.</p>
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>	There is a section 3.2 in ES Chapter 19 [AS-038] which refers to future years. The County Council in its capacity as LHA is content that future years have been assessed as per the need set out in WebTAG guidance.
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</p>	The County Council has worked together with the Applicant and are satisfied that the applicant has followed CCCs Transport Assessment Guidance.

			what needs to be done to address this situation.	
20.17	CCC, CCoC	SCDC,	<p>Strategy documents – relevance to decision</p> <p>ES Chapter 19 [AS-038] refers to the following documents: ▪ 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 ▪ 3.17 Cambridge City Access</p> <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</p>	The ExA is referred to the County Council's LIR submitted at Deadline 1.

		each document you consider to be Important and Relevant.	
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 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. RRs [RR-005 and RR-012] raise a concern relating to AIL movements. 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</p>	<p>The County Council as the Local Highway Authority considers that all abnormal loads should use the National Highways network until the end of the journey when a short section of the Local Highway Authority’s network will need to be used to gain access to the main site. Given the traffic sensitive nature of the B1049 and its junctions with the A14 all abnormal loads should be delivered outside peak times. The County Council will seek this control on abnormal loads through a requirement in the DCO.</p>

		<p>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: 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> <p>Could National Highways and CCoC please explain: g) whether there are any network restrictions that the Applicant should be aware of /</p>	
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		which could pose an issue for the transportation of AIL to the work sites.	
20.23	Applicant, National Highways, CCoC	<p>Choice of vehicular access 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 overwhelming preference 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 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.</p> <p>6.1.10 Option 1 generally outperformed 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</p>	CCoC would not be the relevant authority to respond to this question.

		<p>being delivered without adversely affecting road safety or the capacity of the strategic road network. 6.1.11 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.</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>	
20.26	Applicant, CCoC	<p>Access to public transport Para 2.7.11 of the TA [AS-108] notes: improved pedestrian accessibility to the local bus stops and the provision of a new bus stop if required as part</p>	<p>a) The bus service links Landbeach to central Cambridge. The timings as of November 2023 do not support workers at the site.</p> <p>b) This could be done by the Cambridgeshire and Peterborough Combined Authority or by Stagecoach at any time.</p> <p>c) If needed a bus stop flag would be paid for by Stagecoach.</p>

		<p>of future reviews of bus services.</p> <p>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? c) how would new bus stop infrastructure be paid for and how would the funding 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>a) Table 2 gives a good indication of the level of use of each location. December use will be lower than summer but the level of the flows will not be significantly different.</p> <p>b) This is possible as some children from Horningsea might attend Fen Ditton primary school. However, the TA uses peak hour flows and analysis in its considerations which is why counts were undertaken after 4pm.</p> <p>c) These locations are more recreational and less commuter sensitive and so these counts are considered to be representative.</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>	
20.38	CCoC	<p>Construction traffic routes – safety With reference to the swept path analyses at Appendix G of the TA [AS-108]:</p> <p>a) Are there any other junctions or access points that should be analysed?</p> <p>b) 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.</p> <p>c) 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])?</p> <p>d) Would a condition survey need to be carried out before works take place to ensure that any works-related damage can be identified?</p>	<p>a) No, the County Council do not consider there are other junctions or access points to be analysed.</p> <p>b) The suitable design of works within the adopted public highway or third-party land should overcome this type of issue.</p> <p>c) Any damage to footways should be rectified in the County Council's view by the Applicant at no cost to the Highway Authority. The response time would be dependent on the level of damage.</p> <p>d) Yes, the Highway Authority would normally seek a condition survey for 50m either side of an access point prior to works commencing. This distance would encompass the area for turning (where maximum damage can occur). In addition, the primary point where HGV's will be slowing significantly, which can lead to the 'scuffing' of the surface course.</p>
20.39	The Applicant, CCoC, SCDC, Waterbeach Parish	<p>Construction traffic – alternatives</p>	<p>a) Although it is noted that part a) was for the applicant, CCoC considers it relevant that Cardyke Road and sections of Cambridge Road were constructed in the early 1970's (the side orders to close Landbeach Road</p>

<p>Council, Horningsea Parish Council</p>	<p>Applicant please respond to all parts; other parties please respond to all parts except a) and c) a) 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? b) Are there any known road safety issues in Waterbeach? c) 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. d) 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?</p>	<p>date to 1973) and as such are better suited to carry HGV traffic than the roads leading to and through Horningsea. There is no doubt that there are potential issues associated with the use of Station Road in Waterbeach, but this is shorter than the High Street in Horningsea and thus the potential for conflict is reduced. b) There are a number personal injury accidents throughout the village. Along the proposed route there have been five slight accidents and serous accident over the last five years, which is the same number as those that occurred in Horningsea. However, the only ‘cluster’ (two slights and one serious) is on the curve of Chapel Street and Station Road. f) In principle the HGV movements to access sites are acceptable to the Highway Authority and the authority is also content that suitable routing agreements can be put in place in line with the CTMP. g) CCoC seeks confirmation that AWS have discussed with U&C and RLW the potential use of the existing haul road access off the A10 to service sites COA12, COA13, COA14, COA17, COA18, COA26 and COA29. This routing will remove significant levels of construction traffic for the village of Waterbeach. h) The Applicant has proposing to avoid deliveries during rush hours. This minimises the impact on Station Road and the Waterbeach level crossing.</p>	<p>date to 1973) and as such are better suited to carry HGV traffic than the roads leading to and through Horningsea. There is no doubt that there are potential issues associated with the use of Station Road in Waterbeach, but this is shorter than the High Street in Horningsea and thus the potential for conflict is reduced. b) There are a number personal injury accidents throughout the village. Along the proposed route there have been five slight accidents and serous accident over the last five years, which is the same number as those that occurred in Horningsea. However, the only ‘cluster’ (two slights and one serious) is on the curve of Chapel Street and Station Road. f) In principle the HGV movements to access sites are acceptable to the Highway Authority and the authority is also content that suitable routing agreements can be put in place in line with the CTMP. g) CCoC seeks confirmation that AWS have discussed with U&C and RLW the potential use of the existing haul road access off the A10 to service sites COA12, COA13, COA14, COA17, COA18, COA26 and COA29. This routing will remove significant levels of construction traffic for the village of Waterbeach. h) The Applicant has proposing to avoid deliveries during rush hours. This minimises the impact on Station Road and the Waterbeach level crossing.</p>
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		<p>e) Has an option been looked at where construction traffic is split between Waterbeach and Horningsea? If not, why not?</p> <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 [APP166])?</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>	
20.48	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 The</p>	The County Council does not consider there to be a material difference between vehicles delivering materials from the east to use junction 33 to access Junction 34 of the A14, whereas vehicles arriving from the west would not. Vehicles from the east have to use junction 33 in order to be

		<p>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. 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>	<p>able to exit the A14 at junction 34 from the west, as this junction only has sliproads on the western side.</p>
20.49	Applicant, National Highways, CCoC	<p>Trip generation – construction phase assumptions 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. a) Para 2.3.4 of ES Chapter 16: ‘Material resources and waste’ [APP-048] states that the study</p>	<p>a) CCoC notes this assumption is consistent with the Transport Assessment p259. c) The highways authorities agree with the ‘10% from the east / 90% from the west’ split. d) A greater split from the east would result in more movements at the Milton interchange so that vehicles can approach j34 from the west. We are most concerned with operational traffic rather than construction traffic as construction traffic flows are short term in nature. As a result, we would be unlikely to be concerned of any long-term impacts at the Milton interchange.</p>

		<p>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> <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?</p>	
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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. Do you consider that sensitivity testing should be undertaken to address these considerations? If not, please explain why. 	Other DCOs with similar timescales are A428, Sunnica. There may be a greater cumulative impact on the national highway network (A14, M11) in this regard, for which National Highways will respond.
20.53	Applicant, CCoC, National Highways	<p>Junction modelling – short-term exceptional movements</p> <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</p>	<p>a) Yes, it would extend to the north but a vehicle exiting the site access looking to access the A14 will join this queue.</p> <p>b) The queues would not extend as far as the site access to the north of Horningsea. The applicant is seeking to monitor construction vehicles.</p> <p>c) This scenario is a worst case one for construction. I am sure that this will be managed day to day</p>

		<p>queue length limit and that 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? 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 constant movement of construction vehicles referred</p>	<p>d) The highway authority is unlikely to seek closing a road so that it can be used for construction due to the impact on amenity for residents.</p>
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		to in 10.2.3 of the TA and affect the successful implementation of the concrete pours and drilling? 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 constant movement of construction traffic.	
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 vice versa) 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</p>	CCoC notes this is set out in the first bullet point of para 4.1.3

		explain where this information is set out in the ES.	
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: 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. Para 4.5.6 concludes that: Overall, it is considered it is that the impacts of the proposed development can be mitigated</p>	e) See Q20.39 response to g).

		<p>limited through the proposed construction management of the transport network and are not significant.</p> <p>To the Applicant:</p> <p>a) What efforts have been made to obtain construction traffic information for the Waterbeach Station Relocation?</p> <p>b) How can it be concluded that an effect that is not known can be mitigated?</p> <p>c) Could the potential for cumulative impacts be reduced or avoided by routing construction traffic through Horningsea?</p> <p>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> <p>To SCDC, CCoC and Network Rail Infrastructure Limited:</p> <p>e) Are you satisfied with the approach suggested by the Applicant?</p>	
20.57	Applicant, CCoC	Assessment of impacts – construction phase	On the roads to be used for the construction access routes, it is unlikely that changes in traffic volume could result in a harmful impact that requires mitigation.

			<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>	
20.59	CCC, CCoC	SCDC,	<p>Construction Workers Travel Plan Para 1.8.2 of the CWTP [APP-150] states: The measures included with the final CWTP would be developed through consultation with the relevant local highway authority and the relevant local planning authority.</p> <p>a) Please set out the measures that you consider should be included.</p> <p>b) How should the CWTP be secured, monitored and enforced?</p>	<p>a) The key measures in the travel plan will be the encouragement of car sharing and a work bus from a railway station or other destination and installation of cycle parking at sites.</p> <p>b) CWTP will be secured as a requirement condition of permission should it be given. Monitoring is set out in section 6.3. Enforcement on the monitoring or the implementation of the travel plan will be on request by the County Council should we need to see the data, although it would be helpful if you could require that monthly reports from the applicant are sent to CCoC.</p>

20.60	CCC, CCoC	SCDC, Construction Workers Travel Plan Para 4.3.1 of the CWTP [APP-150] states: 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. a) Please explain which other travel options would be practical for members of the workforce. b) How would informal parking by staff and visitors, whether on or off site, be monitored and prevented?	a) Other travel options such as car sharing is a key measure and is mentioned in para 4.3.2 of the CWTP [APP-150]. Another key measure could be a work bus from a key destination like a railway station. b) When looking at informal parking for staff and visitors, whether on or off site, the site layout will determine whether this will be possible or not.
20.67	National Highways, CCC, CCoC	SCDC, Mitigation – CTMP 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]. a) Are the measures in the CTMP sufficient / satisfactory?	a) The measures outlined in section 6.3 of the CTMP are considered to be reasonable and appropriate b) Yes, they are enforceable as we can ask the applicant for the evidence from the ANPR cameras and reporting of incidents c) A reporting system operates in Northstowe with limited success. However, it is important that the applicant does have a reporting system and acts on any incidents in a diligent way with sub-contractors. d) To ensure compliance with the CTMP, CCoC would expect the applicant to resource these measures adequately as these measures will be required. e) In terms of the use of secondary mitigation to address highways impact, the key measure to address highway impacts is to ask all sub-contractors to car share. This is appropriate and a good idea and hopefully will be enforced during construction.

		<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>	
20.77	Applicant, CCoC	<p>Junction modelling – commitments</p> <p>TA [AS-108] paras 9.1.2 and 9.1.3 state that Traffic modelling has considered the following committed developments in the vicinity of the Proposed Development:</p> <ul style="list-style-type: none"> • Waterbeach New Town, including the relocation of the Waterbeach Station; • Marleigh Development; • Land north of Cherry Hinton; • Cambridge Eastern Access Scheme (CEAS); and • NEC AAP, with special reference to policy 22 which specifies a trip budget. 	<p>a) It is agreed that these committed developments would be taken into account with the application of Temprow growth factors of road traffic growth.</p> <p>b) Referring to each TA for the developments was not considered necessary as we are unsure of the build out rates of each development and therefore the traffic flows resulting from each development. Temprow was in this instance considered reasonable to refer to.</p> <p>c) Yes, it is correct to classify all these prospective developments as 'commitments'.</p>

		<p>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.</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>	
20.79	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</p>	<p>a) The increase in flow southbound on Horningsea Road between the 2026 base and 2038 base is about 80 vehicles. Most of this could come from Waterbeach new town and most traffic from the new town should be on the A10. Measures are to be implemented in Waterbeach and Horningsea villages to deter through traffic as mitigation from the new town. This will deter</p>

		<p>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>	<p>traffic from the new town from routing via Horningsea Road. As a result, this flow is considered a reasonable assumption. Traffic flows on Horningsea Road have an element of diverting traffic from the A10 to avoid congestion. By 2038 the A10 should also be improved with increased capacity. This should reduce traffic seeking to divert through Horningsea.</p> <p>b) It is clear in table 9.14 of the TA that the operational effects of the development are small. By 2038 there will be many junctions in Cambridge that will be over capacity if they are not already over capacity. This is why the Greater Cambridge Partnership have a programme of infrastructure that will enable a mode shift from car to other modes. The conclusion drawn in para 9.5.49 is reasonable.</p>
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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 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.</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>Where the impact of any particular development does not meet the test of a ‘severe’ impact it can be acceptable to propose a development with no mitigation.</p> <p>The Transport Assessment Team and the County Council must always refer to National and Local Planning Policies and the tests of ‘Severity’ when assessing any transport impacts. In Cambridge City and the surrounding areas, it is not unusual for part of the network to be operating over, at, or above effective capacity.</p> <p>The test of severity is one which is not clearly defined. However, in teh CCoC experience, it is objectively very difficult to prove a severe impact where the traffic arising and impact from a particular individual development is minimal compared to overall growth in the area.</p> <p>Turning to the matter of mitigation, again CCoC must refer to the planning tests and ensure that any mitigation is proportional to the impact. On a congested network such as exists in the City and surrounding areas, large scale schemes are required to reduce congestion and it would not be reasonable to request that the required mitigation is funded by smaller minimal traffic generating developments.</p> <p>The volume and indeed nature of Construction vehicles is such that the construction traffic has the propensity to cause far more inconvenience to residents than daily operation traffic albeit that this inconvenience has a defined period.</p> <p>Construction traffic has a high proportion of large commercial Heavy Goods Vehicles (HGVs) compared to operation traffic which in this case will predominantly consist of staff, visitor, and maintenance vehicles. HGV’s are slow moving and (in terms of modelling) do have an impact which is equivalent to 2-3 cars on the network. Furthermore, the environmental impacts on an HGV are far more damaging than a single car.</p>
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		<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>	<p>It is therefore the case that the Transport Assessment Team and Local Highway Authority would always seek to minimise peak hour construction traffic.</p> <p>The OTMP would primarily be enforced by the applicant. However should they fail to do so, it would fall to the Local Planning and Highway Authorities to investigate any breach of protocol. This would have an impact on resources for both authorities meaning that timescales for enforcement could realistically be compromised.</p> <p>Initially any breaches of protocol would be referred to the applicant who would manage the OTMP. They would be obliged to enforce this in the first instance</p> <p>The proposed increases in DOS are acceptable to the Highway Authority subject to the review of the details of the traffic signals modelling and design of the junction being satisfactory.</p> <p>There is no certainty as it is very difficult to quantify predictions of mode shift via modelling, therefore the Transport Assessment Team usually take a worst-case approach and assume that mode shares will remain at the levels currently being experienced in any given area.</p> <p>However, whilst the mode share of this particular development may not reduce, the overall strategy for Cambridge including the City Deal schemes is such that vehicular traffic on the network will reduce in the future.</p>
20.83	Applicant, CCoC	<p>Assessment of impacts – operational phase The ES assesses effects in relative terms and quantifies the magnitude of the effects based on the percentage</p>	<p>As alluded to in our answer to 20.57. On the roads to be used for the construction access routes harmful impact is considered to be unlikely.</p>

		<p>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?</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 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</p>	<p>Cambridge City will experience significant growth in the future given the large number of residential and commercial sites contained with the existing and future draft local plans. This development will add a minimal volume of traffic compared to the overall planned growth. Cambridge has a number of schemes in the pipeline through the City Deal programme which are designed to reduce the volume of vehicle trips to and from the City.</p> <p>The modelling undertaken at Junction 34 does not take these into consideration therefore it gives a far more pessimistic outlook than will be experienced once the City deal schemes start to come forward.</p> <p>Currently Cambridge does not experience a single peak hour' in terms of traffic volumes but rather has a peak period covering the three hours from 7:00-10:00. Restricting peak hour movements over any peak period would be unenforceable and, in the view of the Transport Assessment Team, would not achieve any great reduction in traffic given the commentary above.</p> <p>It would not be possible or legal to prevent all vehicles travelling through Horningsea as there may be employees for which this is the fastest or</p>

		<p>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.</p> <p>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</p>	<p>most convenient route to and from their workplace. As alluded to above, enforcement of a peak hour or peak period ban would be very difficult.</p> <p>For this reason, the Local Highway Authority do not currently have any schemes or instances where all vehicles with a specific origin or destination are monitored for the purposes of restricting route choice</p> <p>It is the view of the Local Highway Authority that secondary mitigation as proposed would not achieve its aims due to aforementioned enforcement and legal issues.</p>
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		resources to ensure compliance? e) Overall, what are your views on the use of secondary mitigation to address highways impacts in this case?	
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?	Mitigation measures have been proposed at Junction 34 of the A14, these being the implementation of an enhanced signalised junction and enhanced active travel / equestrian routes which tie into the Greater Cambridgeshire Partnership's Horningsea Greenway scheme, local walking, cycling and equestrian routes in and around the site itself. The Transport Assessment Team are satisfied that the mitigation measures proposed meet the required planning tests and policies at a Local and National level.
20.92	Applicant, CCoC	Approvals – agreement of traffic management works On page xii of ES Chapter 19 [AS-038] it is stated that 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.	This is one of the issues with Part 3 of the DCO as drafted. The Local Highway Authority will need to be consulted in relationship to traffic management plans as part of its duties under the Traffic Management Act 2004. If the applicant were to commence works without such approvals being required, the impact on the network as a whole could be considerable.

		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 (inter alia) Policy 23 of the Minerals and Waste Local Plan 2021?	The nature, location and volume of Electronic Charging points should be in the detailed Travel Plan to be submitted prior to the Operation Phase Commencing. However, Cambridgeshire County Council considers this information should be clearly defined prior to the DCO being determined and should be reflected in the Travel Plan now.
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?	The OWTP currently seeks to clarify these matters in the detailed Travel Plan. However, it does allude to the fact that the Travel Plan will become a ‘Live’ document which will be revised after each Travel survey has been completed. It is not anticipated that any measures outside those set out in Requirement 12 as necessary, (although commitment to looking at alternative measures would be welcomed). It is more likely that those measures that were not achieving a significant impact would be looked at to see whether they could be enhanced / promoted in a more robust way. Again, the Transport Assessment Team of the County Council would recommend that the Travel Plan makes a firmer commitment to the measures and the enhancement thereof through the Travel Plan process prior to the DCO being determined.
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?	(a) The Construction Traffic Management Plan [AS-109] correctly identifies weight restriction for Horningsea Road, and we can confirm there is an exception for vehicles used for or in connection with the conveyance of goods to or from any premises situated on or adjacent to that length of road. (b) The CCoC considers there is no need to remove or change the current TRO for Horningsea Road.

		b) Should the weight limits be removed or changed?	
Water resources			
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?	Yes the County Council considers that the NE's advice is correct. Further we are seeking the Code of Construction Practice Parts A [APP-068] / B [AS-161] be updated to confirm that the water monitoring programme will include Black Ditch, Stow-cum-Quy SSSI and Allicky Farm Ponds CWS. In addition teh CCoC seeks confirmation of the remedial action that will be undertaken if an issue is identified. These should be ensured through the provisions of the DCO.
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 to you agree or disagree with this? Please evidence your stance on this matter.	The capacity of the foul water treatment system is not a matter that the LLFA can address or comment upon.
21.47	EA, CCoC	Flood risk Do you agree with the Applicant's approach to	Fluvial risk matters are considered by the EA and are not for the LLFA.

		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?	The following strategies are in the County Council's view relevant to the assessment of flood risk implications of the DCO application. <ul style="list-style-type: none"> • Cambridgeshire Flood Risk Management Strategy https://www.cambridgeshire.gov.uk/business/planning-and-development/flood-and-water/flood-risk-management/flood-risk-management-strategy • Greater Cambs Shared Planning Strategic Flood Risk Assessment https://www.greatercambridgeplanning.org/emerging-plans-and-guidance/strategic-flood-risk-assessment/
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?	Water supply is not something the LLFA can assist with or that is within the remit of the County Council.
21.59	EA, CCC, CCoC, SCDC, NE.	Review of additional information Please review and comment on the additional information provided by the Applicant in	The information provided by the Applicant in the requested additional information is more around fluvial and main river issues (Environment Agency) and Geotechnical information around potential contaminants in the ground. These are not matters for the County Council in its capacity as the LLFA to comment on. However, the proposals for the new ditch

		<p>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):</p> <ul style="list-style-type: none"> the oMMP [AS-073], Appendix 20.5 Fluvial Modelling Report [AS-113] and Appendix 20.6 3D Velocity Mixed Model [AS-114]. 	<p>network for water voles is something that may require work with the LLFA if this is to impact on existing watercourses. There is an element of consent work which is required under the DCO with the LLFA for works to watercourses. However, the LLFA is not opposed to the new water vole ditch network.</p>
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Appendix 1

Traffic Survey Data and access optioneering - Technical Discussion -
notes of the 13 April 2021 meeting



Meeting Notes

Project: **C W W T P R**

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Traffic Survey Data and access
optioneering - Technical Discussion

Date: 13 / 04 / 2021

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Time: 15 : 00 - 16 : 15

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Location: M i c r o s o f t T e a m s

Attendees:

CWWTP - Mike Dexter, Vicky Hurrell
(Anglian Water), Russell Howles, Tim De
Laat, Andrew Rawlings, Emma Case,
Michael Stallard (Mott MacDonald)

Eric Cooper, Stephen Greenhill, (Highways
England), Tam Parry, Lou-Mason Walsh, Jez
Tuttle (Cambridgeshire County Council)

Agenda/Purpose of Meeting

- **Welcome and Introductions**
- **Re-cap of last month's Technical Working Group**
- **Currently available historic traffic data**
- **Application of historic traffic data to optioneering and appraisal**
- **Policy update**
- **Future surveys for Transport Assessment**

TDL welcomed everyone to the meeting, summarising what was discussed at last month's TWG, highlighting the agenda for today's meeting "Traffic Survey Data and access optioneering".

TDL Outlined the currently available historic traffic data and the three data sources which have been used so far for access option assessment (as bullet pointed below).

- Local Road Network (including High Ditch Road/Horningsea road and J35)— **2013** Survey Data and Traffic Flow Diagrams from the "Land North of Newmarket Road" TA (WSP) S/2682/13/OL.
 - A14 Flow between J23-24 & 24-25 - One Way Flow data (by hour) from DFT website (**2013-2019**).
 - Milton Interchange flows - **2021** future base year Traffic Flow Diagrams from WNT TA.
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LMW - questioned the use of 2021 future base data at the Milton Interchange due to its perception of being a COVID year. Questioned the use of TEMPRO growth factors for Cambridgeshire, stating that a comparison for a 2013-2021 growth factor will need to be made to validate this factor.

RH - Stressed the fact this traffic data will not be used in isolation for the purposes of Transport Assessment and will only be used for the purposes of access optioneering.

LMW - Stated that 2018 flows may be more appropriate for the Milton Interchange due to the fact that it accounts for observed data and is not a growth-based future base year. LMW said that CCC is happy to provide the team with this data.

TDL - Thanked LMW for this Information, stating that MM will investigate the use of 2018 observed data at the Milton Interchange (J33).

JT - Agreed with the use of 2018 data if available, questioning however it's potential compatibility with the project timeline. Asked for further detail on project timeline.

MS - Explained the project timeline with a DCO submission of Q4 (Dec)2022 and an full Env Statement at that time with comprehensive Tsp Chapter. LMW - stated that regardless of traffic data used (2021 baseline or 2018 baseline), Cambridgeshire County Council (CCC) will not be directly opposed to its use, the project team just needs to be confident that they are able to defend what they are using for analysis and are happy to stand up during enquiry (If needed).

TDL - Thanked LMW for this

EC - Asked whether it is worth considering the use of flows coming out of the Cambridgeshire Huntingdon model

LMW - Strongly dismissed the use the Cambridgeshire Huntingdon model.

LMW - Asked the project team to consider the use of the Black Cat model data as It covers an extent relevant to CWWTP. EC said he can provide a contact for the data. JT asked if this covers the Honeyhill slips. LMW confirmed it covers all of Cambridgeshire.

RH - questioned the potential use of CSR (base year 2015)

LMW - stated that the CSR base is due to be updated to 2019 and is a possibility for data validation.

TDL - explained the application of construction/operation flow to our baseline.

TP, JT & LMW - agreed and happy for the outlined (2018 base) approach to be applied as part of an access optioneering process.

RH - explained that any operational assumptions we are making are based on existing Anglian Water (AW) ANPR data.

MD - emphasised this point, stating that these operational flows have also been largely unaffected by COVID and will include a minimal number of operational staff members. The main consideration will be HGV movements.

TP - questioned the 90:10 split assumption (west/east) for construction traffic.

RH - explained that the construction split is based upon nearby sources of construction material available in the area.

MD - provided detail on potential material sources via - Holyhead Wales (from the west) suggesting that our 90% assumption has merit but is of course subject to change following detailed design and contractual arrangements.

EC - questioned the complexity of this construction and whether any unusual specialist materials were required as this is an issue he has come across on other similar projects.

MD - reassured the group that construction of a new CWWTP is relatively simple given previous experience and that there are limited unknowns to consider thus far.

TDL - described the layout for base year traffic flow diagrams. Explaining the extent of the network to be used for options appraisal.

TDL - outlined the project teams' approach for access appraisal. Highlighting the fact that we are currently considering 6 access options, of which we hope to scope out 2-3 if this is feasible. Listed and explained the following access options.

- HSR-01 - Horningsea Road
- HDR-01 - High Ditch Road
- Quy-01 - Access via A1303, north of the Quy Interchange
- Quy-02 - Access via A1303, north of the Quy Interchange
- JCT-01 - Access via a new grade separated junction on the A14
- ES-01 - Access via eastern slips on J34 of the A14

RH - stated that the additional access options that were not discussed at our last TWG meeting, (Quy1/2 and JCT-01 & ES-01) are a result of further consideration and internal review as well as a number of responses following public consultation. The project team would like to assess all options before picking a preferred access option.

AR - highlighted the complexity of some of the proposed access options, including the new grade separated junction

TDL - provided a policy update to the group, listing COVID related policy which will need to be considered during both access option appraisal and transport assessment.

- Bircham Dyson Bell (BDB) Pitmans, Progressing DCO Projects During Covid-19, May 2020
- Pinsent Masons/Arup, Robust EIA during Covid-19 and beyond, June 2020
- Department for Transport, WebTAG Updates on Covid-19, July 2020
- MHCLG, Coronavirus (COVID-19) NSIP guidance, July 2020

TDL - Stated that the DfT's "appraisal and modelling strategy" (July 2020) sets a precedent to conduct surveys during the pandemic.

TDL - Stated that scenario testing should be used to explore plausible futures and that nationally important infrastructure projects must continue as best is possible during these uncertain times, utilising a mixture of historic and present-day data sources.

TDL - Explained the project team's desire to survey in **late June** at both the existing site and the local and strategic network relevant to the preferred site location. JT said he would be concerned about a June survey date given the proximity to the school holidays.

LMW - Stated that CCC are happy to discuss the opportunity for surveys in relation to this project, but would like to stress that there is risk associated with surveys being conducted in late June given that full restrictions will only just have been lifted stating that it may be wiser to consider surveying in Autumn (late September/October at the earliest) to minimise risk associated with licensing/ COVID. However, in theory, based on current COVID timelines, late June is fine, subject to no further government update.

LMW - Stressed CCC's desire to help on this point and push forward with the project. She advised that CCC are working on a new model and collecting data to validate this. Happy to keep talking to agree the right date for surveys.

Jez - Stated that there may be worth in utilising new surveys for the purposes of validation/sensitivity testing.

TDL/RH - Agreed.

MS considered that the Project Team might have failed to consider a worst-case scenario for Covid-19 in 2021 whereby a 'Lockdown 4' would be imposed by the Gov after April 2021. Assuming MM was required to avoid Lockdown periods, this might mean that the Project DCO EIA Tsp baseline survey programme could not be

progressed in 2021 but MM do not consider that the required baseline surveys can be left to 2022. As a result, to manage risk, MM will have to conduct baseline surveys in 2021 regardless of any limiting Covid-19 issues and resultant depressed flows, and assume the Lockdown lifted in April 2021 will continue.

MS - asked If there was a possibility that this work can be conducted without primary data collection.

TDL - stated that work without primary data collection is unlikely to be acceptable due to DFT guidance which focuses on a mixture of primary and historic data.

AR - asked about the potential to survey firstly in June (for example) and then later on "post-COVID" as a validation exercise (In line with JT).

LMW - stressed the quantity of survey data currently available on the strategic network and the upcoming 2022 CSRM surveys.

MS - stated the need for a future WebTAG discussion with all parties on the method of assessment for the 6 junction access options

VH/TDL - thanked all attendees for their time and valid contributions.
