

Date: 20 November 2023
Our ref: 454647
Your ref: WW010003
Registration identification number: 20041036

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BY EMAIL ONLY

Dear Sir / Madam

NSIP Reference Name / Code: WW010003 Cambridge Waste Water Treatment Plant Relocation Project
User Code: 20041036

Title: Written Representations and response to the Examining Authority's first written questions

Examining Authority's submission deadline 1 (D1) with a date of 20 November 2023

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

For any further advice on this consultation please contact the case officer Catherine Duerden via email at ██████████@naturalengland.org.uk and copy to consultations@naturalengland.org.uk.

Yours faithfully

Janet Nuttall
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Natural England's Written Representations

PART I: Summary and conclusions of Natural England's advice.
PART II: Natural England's detailed advice (starting on page 4)
PART III: Natural England's response to the Examining Authority's (ExA's) first written questions (starting on page 9)
PART IV: Natural England's detailed comments on the Development Consent Order (DCO) (starting on page 18)

Part I: Summary and conclusions of Natural England's advice

Summary of Natural England's advice

This is an update of our detailed advice provided at Relevant Representations stage.

Natural England's main outstanding issues relate to our ask for stronger commitments, to be secured through the Landscape, Ecology and Recreational Management Plan (LERMP), to address recreational pressure concerns described in our Relevant Representations [RR-015]. Suggestions for the resolution of this are given in our answer to ExQ1.7.29. We also reiterate our ask for the LERMP to be expanded to cover the entire scheme, so that all mitigation, management and monitoring is contained in one document, as explained in our answer to ExQ1.5.38.

Following the Examining Authority's Habitats Regulations Assessment (HRA) question (ExQ1.5.60) we have amended our advice to request that Eversden and Wimpole Woods SAC is taken forward into the Appropriate Assessment stage. Since our Relevant Representations submission, Natural England has also issued a Letter of No Impediment in relation to the draft badger licence application.

Hydrology issues may be resolved by documents which are currently being prepared by the Applicant, particularly the Outline Water Quality Monitoring Plan. We continue to support the Environment Agency's unresolved request for reedbed creation in the vicinity of the outfall, with reasoning explained in our answer to ExQ1.5.21.

Soils issues, raised in our Relevant Representations, may potentially have been resolved by recently submitted documents; however, we are awaiting internal advice to confirm this and will provide an update to the Examining Authority as soon as we can.

Natural England remains optimistic that outstanding matters can be resolved with the Applicant through ongoing discussions and / or written representations. We will only make oral representations at an issue specific hearing or open floor hearing where significant matters remain outstanding following further engagement with the Applicant and subject to Natural England's available capacity.

Part I of these Written Representations provides a summary (above) and overall conclusions of Natural England's advice. This advice identifies whether any progress in resolving issues has been made since submission of our Relevant Representations [RR-015]. Our comments are set out against the following sub-headings which represent our key areas of remit as follows:

- International designated sites
- Nationally designated sites
- Protected species

- Biodiversity net gain
- Soils and best and most versatile agricultural land
- Ancient woodland and ancient/veteran trees
- Other valuable and sensitive habitats and species, landscapes and access routes

Our comments are flagged as red, amber or green:

- Red are those where there are fundamental concerns which it may not be possible to overcome in their current form
- Amber are those where further information is required to determine the effects of the project and allow the Examining Authority to properly undertake its task and or advise that further information is required on mitigation/compensation proposals in order to provide a sufficient degree of confidence as to their efficacy.
- Green are those which have been successfully resolved (subject always to the appropriate requirements being adequately secured)

1.1 Natural England's overall conclusions

1.1.1 International designated sites:

Amended advice requesting an HRA Appropriate Assessment (AA) for Eversden and Wimpole Woods SAC (**amber** issue).

1.1.2 Nationally designated sites:

One unresolved issue (**amber**) regarding Stow-cum-Quy Fen SSSI recreational pressure, and six hydrology issues (**amber**) which may be potentially resolved by the submission of an Outline Water Quality Monitoring Plan (currently being prepared by the Applicant), and a more detailed CEMP.

1.1.3 Protected species:

Bat and water vole amendments should be included in the formal licence application submission, and lighting strategy changes may be required depending on the HRA AA (**amber**). Badger LONI has been issued (**green**). Two species mitigation issues (**amber**) are unresolved, regarding their suggested inclusion in the LERMP.

1.1.4 Biodiversity net gain:

All issues resolved (**green**).

1.1.5 Soils and best and most versatile agricultural land:

Three potentially resolved issues (**amber**), awaiting advice from internal Natural England soil specialists.

1.1.6 Ancient woodland and ancient/veteran trees:

No issues (**green**).

1.1.7 Other valuable and sensitive habitats and species, landscapes and access routes:

Five unresolved issues (**amber**) relating to the LERMP and a request for reedbed proposals.

1.1.8 All **amber** issues, except those relating to soils are covered in more detail in our answers to the Examining Authority's First Questions (Part III, Table 2) and are signposted to within Part II (Table 1).

Natural England's Written Representations

Part II: Natural England's detailed advice

Part II of these Representations updates and where necessary augments Part II of the Relevant Representations. It expands upon the detail of all the significant issues ('red' and 'amber' issues) which, in our view remain outstanding and includes our advice on pathways to their resolution where possible. Part II also shows 'green' issues which have been agreed since our Relevant Representations [RR-015] (subject always to the appropriate requirements being secured adequately).

Natural England will continue engaging with the applicant to seek to resolve these concerns throughout the examination. Natural England advises that the matters indicated as 'red' and 'amber' will require consideration by the Examining Authority during the examination.

Natural England's Written Representations, Part II, Table 1

Table 1: Natural England's detailed advice						
NE key issue ref from RR-015	Topic	Issue summary (C) – construction phase (O) – operational phase	NE commentary and advice on further details about the project to enable assessment or further evidence/assessment work required	NE comment on mechanism for securing resolution, e.g. mitigation/compensation	Matters that must be secured in the DCO	Risk Red/Amber/Green
International designated sites						
1	HRA		As per our ExQ1.5.60 answer, complete an Appropriate Assessment (AA) for Eversden & Wimpole Woods SAC.	Submission of new AA.		Amber
National designated sites (biodiversity and geodiversity)						
2a	Stow-cum-Quy Fen SSSI recreational pressure	O	Unresolved. See our answer to ExQ1.7.29. Natural England would be willing to commence discussion with the Applicant, around potential solutions to this matter, as soon as possible.	LERMP strengthened wording. Commitments Register inclusions as per our ExQ1.7.29 answer.		Amber

Table 1: Natural England's detailed advice						
NE key issue ref from RR-015	Topic	Issue summary (C) – construction phase (O) – operational phase	NE commentary and advice on further details about the project to enable assessment or further evidence/assessment work required	NE comment on mechanism for securing resolution, e.g. mitigation/compensation	Matters that must be secured in the DCO	Risk Red/Amber/Green
2b	Black Ditch water quality monitoring	C/O	Potentially resolved. Awaiting sight of finalised Outline Water Quality Monitoring Plan once this has been signed off by EA. See ExQ1.21.11.	Submission of Outline Water Quality Monitoring Plan.		Amber
2c	Monitoring & mitigation strategy and CEMP	C/O	Awaiting sight of finalised Outline Water Quality Monitoring Plan once this has been signed off by EA. See ExQ1.21.11. Detailed CEMP still requested as the current draft CEMP is not very informative.	Submission of Outline Water Quality Monitoring Plan. Submission of more detailed CEMP.	See Part IV, Table 3 below, under DCO Requirement 16	Amber
2d	Groundwater monitoring	O	Potentially resolved. Awaiting sight of finalised Outline Water Quality Monitoring Plan once this has been signed off by EA. See ExQ1.21.11.	Submission of Outline Water Quality Monitoring Plan.		Amber
2e	Wilbraham Fen SSSI groundwater	C/O	Potentially resolved. Awaiting sight of finalised Outline Water Quality Monitoring Plan once this has been signed off by EA. See ExQ1.21.11.	Submission of Outline Water Quality Monitoring Plan.		Amber
2f	Downstream flood levels	C/O	Potentially resolved. Awaiting sight of finalised Outline Water Quality Monitoring Plan once this has been signed off by EA. See ExQ1.21.11.	Submission of Outline Water Quality Monitoring Plan.		Amber
2g	Water resources	C/O	Potentially resolved. Awaiting sight of finalised Outline Water Quality Monitoring Plan once this has been signed off by EA. See ExQ1.21.11.	Submission of Outline Water Quality Monitoring Plan.		Amber

Table 1: Natural England's detailed advice						
NE key issue ref from RR-015	Topic	Issue summary (C) – construction phase (O) – operational phase	NE commentary and advice on further details about the project to enable assessment or further evidence/assessment work required	NE comment on mechanism for securing resolution, e.g. mitigation/compensation	Matters that must be secured in the DCO	Risk Red/Amber/Green
Protected species						
3a	Water vole & bat licences	C/O	Natural England has provided LONIs for water vole and bats but require amendments to the method statements when the licence applications are formally submitted.	Water vole licence application amendments to be included in formal licence application submission. Amendment of the bats licence application to be included in formal licence application submission. Potential Lighting Strategy amendments, subject to LPA advice and HRA Appropriate Assessment conclusions. See our answer to ExQ1.5.60.		Amber
3b	Badger licence	C/O	Natural England has provided a LONI for badgers and has not requested any amendments.	N/A		Green
3c	Entire scheme species mitigation	C/O	Unresolved. See our answer to ExQ1.5.38.	Expansion of the LERMP.		Amber
3d	Duration of species mitigation management	C/O	Unresolved. See our answer to ExQ1.5.38.	Addition to the LERMP.		Amber
Biodiversity net gain						

Table 1: Natural England's detailed advice						
NE key issue ref from RR-015	Topic	Issue summary (C) – construction phase (O) – operational phase	NE commentary and advice on further details about the project to enable assessment or further evidence/assessment work required	NE comment on mechanism for securing resolution, e.g. mitigation/compensation	Matters that must be secured in the DCO	Risk Red/Amber/Green
4a	BNG Metric submission		Resolved.			Green
4b	20% river unit BNG proposal submission		Resolved.			Green
Soils and best and most versatile agricultural land						
5a	Detailed ALC survey for entire area	C	Potentially resolved, awaiting internal NE specialist advice.			Amber
5b	Soil reuse	C	Potentially resolved, awaiting internal NE specialist advice.			Amber
5c	RR Appendix 1 soil comments	C	Potentially resolved, awaiting internal NE specialist advice.			Amber
Ancient woodland and ancient/veteran trees						
6	None		N/A			Green
Other valuable and sensitive habitats and species, landscapes and access routes						
7a	Access enhancement impacts	O	Unresolved. See our answer to ExQ1.7.29.			Amber
7b	LERMP for entire scheme	C/O	Unresolved. See our answer to ExQ1.5.38.			Amber
7c	Additional documents	C/O	Partially resolved. We would still like to see: <ul style="list-style-type: none"> - An updated LERMP to cover the entire scheme (issues 3c, 3d & 7b), and to address the points in 			Amber

Table 1: Natural England's detailed advice						
NE key issue ref from RR-015	Topic	Issue summary (C) – construction phase (O) – operational phase	NE commentary and advice on further details about the project to enable assessment or further evidence/assessment work required	NE comment on mechanism for securing resolution, e.g. mitigation/compensation	Matters that must be secured in the DCO	Risk Red/Amber/Green
			<p>our answer to ExQ1.7.29 (issues 2a, 7a, 7d & 7e).</p> <p>- Reedbed/natural finish proposals, as covered in our answer to ExQ1.5.21.</p>			
7d	Nature Recovery Network	O	Unresolved. See our answer to ExQ1.7.29.			Amber
7e	Partnership approach	C/O	Unresolved. See our answer to ExQ1.7.29.			Amber
7f	WTBCN & EA	C/O	N/A			Green

Natural England's Written Representations

PART III: Natural England's response to the Examining Authority's (ExA's) first written questions (ExQ1) with a deadline of 20 November 2023

Natural England's Written Representations, Part III, Table 2

Table 2: Natural England's response to Examiner's initial questions			
ExA question ref	Question addressed to	Question	Answer
ExQ1.4.9	Natural England (NE)	<p>Mitigation and requirements</p> <p>NE's RR [RR-015] says that it is satisfied with the Applicant's conclusions in respect of Air Quality on the basis that delivery of air quality control measures within the CoCP are secured through dDCO R8. For the avoidance of doubt, please specify the measures that NE wishes to be secured by R8.</p>	All measures specified in the CoCP:Part A [APP-068] Section 7.8 'Air Quality' should be secured by R8.
ExQ1.5.14	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-125]; and the Preliminary Ecological Appraisal [AS-072].</p>	<p>Outline Outfall Management and Monitoring Plan (oOMMP) [AS-073]</p> <p>Natural England is generally satisfied with the oOMMP, but has the following comments:</p> <p>A) Paragraph 4.3.8 is a little confusing, it says 'the following activities will ensure reasonable precautions have been taken to prevent disturbance of water vole whilst occupying a structure or shelter, to avoid death and/or injury of water vole during construction and operation and to conserve the local population of water vole. All activities will be carried out in accordance with current best practice guidelines ...'</p> <p>– no activities seem to be listed here, so perhaps 'the following activities' should be changed to 'the activities listed in Table 5-1'?</p> <p>B) Paragraph 7.3.1 includes a broken reference error.</p> <p>C) Paragraph 7.4.7 says 'Refer to the Landscape and Ecological Management Plan ... for further detail' – this</p>

Table 2: Natural England's response to Examiner's initial questions			
ExA question ref	Question addressed to	Question	Answer
			<p>is in relation to monitoring of the new ditches, however these ditches currently fall outside of the LERMP area and are therefore not mentioned in the LERMP (although we have requested that these ditches, and the entire works area, should be covered by the LERMP in RR issues 3c, 3d and 7b).</p> <p>Draft CEMP [AS-057] This document is very limited in detail, and contains many blank tables, so it is difficult to provide useful comments.</p> <p>We would however expect that either/both the Site Lighting sections (4.4, 5.4, 6.4, 7.6, 8.3) or Ecology and Nature Conservation sections (4.14, 5.8, 6.8, 7.10, 8.10) should include bat sensitive lighting strategy requirements.</p> <p>We would also like to see a Soil section included, particularly in the Enabling Works Phase.</p> <p>Commitments Register [AS-125] Natural England is generally satisfied with the Commitments Register, except for C58 which we have not been able to find mention of in the LERMP (the stated delivery mechanism). We also feel that this area of commitment needs to be strengthened, along with the LERMP itself. This is covered in more detail, with suggested additional commitments, in our answer to ExQ1.7.29 below.</p> <p>Preliminary Ecological Appraisal [AS-072] Natural England is generally satisfied with the revised PEA, and just note that paragraph 2.2.1 includes a broken reference error. We have no further comments on this document.</p>

Table 2: Natural England's response to Examiner's initial questions			
ExA question ref	Question addressed to	Question	Answer
ExQ1.5.15	Applicant, NE	Protected species licence applications Please provide an update on progress of the draft protected species licence applications.	Letters of No Impediment have now been issued for all the relevant species (badgers, bats and water voles). Any required amendments will need to be made for the formal licence application submission.
ExQ1.5.21	Applicant, NE, CCoC, CCC, SCDC	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 comments or concerns regarding this suggestion?	Natural England supports the EA's recommendation. We also note that in the BNG Report [AS-163] the planned loss of 1.06 reedbed habitat units in the outfall area have not yet been compensated for within the Metric calculations. As noted in section 5.3 of the report, this is a high distinctiveness habitat and therefore must be replaced with habitats that are of the exact same type to avoid 'trading down', which would contravene BNG rules. The report points to Appendix C to explain how this would be avoided, but Appendix C only talks about river units, not reedbed habitat units. If it is intended that reedbed is to be created in conjunction with the proposed wet ditches, then this needs to be made clearer. If the off-site or unit purchase routes are proposed it should be explained why on-site is not possible in the vicinity of the outfall. The creation of reedbed in this area should be preferred, to replace and improve on that which is due to be lost.
ExQ1.5.34	EA, NE, WTBCN	Otter habitat ES Chapter 8 Section 3.1.50 [AS-026] states that evidence of otter was found during surveys in 2021 and 2022 along the watercourses and ditches and the River Cam within the survey area. It goes on to state that suitable terrestrial habitat is limited for otter holts around the proposed treated effluent discharge outfall to the River Cam. Do you agree with this statement?	It can be seen from Figure 8.76 in the Biodiversity Book of Figures [AS-050] that otters do use the area under the A14, close to the proposed outfall, due to the number of spraints recorded. However, Natural England agrees with the statement that 'suitable terrestrial habitat is limited for otter holts around the proposed treated effluent discharge outfall to the River Cam' as no suitable holt features were found in that area during the surveys.
ExQ1.5.38	NE, EA	Mitigation Do you agree with the Applicant that mitigation measures related to the construction of the proposed River Cam outfall	We are uncertain whether the flood risk activities permit is the correct mechanism for securing these measures, particularly as within the oOMMP it states in paragraph 4.3.9 that the

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		(to be set out within a detailed outfall management and monitoring plan (OMMP) – see p69/70 of [AS-026] / the outline OMMP [AS-073]) can be satisfactorily secured through a flood risk activities permit? Are proposed works in the area of the outfall, but not covered by the permit secured through the OMMP, satisfactorily secured by the CoCP Part A [APP-068]?	<p>flood risk activities permit will be submitted in year 2 of construction (although activities will be agreed with the EA in parallel with the DCO). Paragraph 3.2.2 states that the new ditches are required to be in place a minimum of 12 months in advance of water vole displacement, and this paragraph is in the 'Pre-construction' section. This therefore doesn't seem to fit with the timeline of the flood risk activities permit submission, in the second year of construction.</p> <p>NE have asked for ecological mitigation, enhancement (including BNG) and management for the entire scheme to be set out in the LERMP (RR issues 3c, 3d and 7b). This should include the new ditch creation, which is within the outfall area, as it forms part of the BNG improvements that require 30-year monitoring. This would mean that all management and monitoring is detailed and secured in the same document, and easier to use in the long-term.</p> <p>Other than the above, the anticipated contents of the detailed OMMP and CoCP Part A should be sufficient to cover aspects relating to Natural England's statutory remit. We defer to the Environment Agency for comment on any matters outside of our scope.</p>
ExQ1.5.39	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>	Natural England broadly supports this conclusion, however the issue of reedbed habitat BNG units, as described above in our response to ExQ1.5.21, does need to be resolved.
ExQ1.5.60	Applicant, NE	<p>Questions relating to Habitats Regulations Assessment (HRA)</p> <p>To the Applicant:</p> <p>ES Chapter 8, para 3.1.45 [AS-026] notes a cluster of records for barbastelle bat along the disused railway line. ES Appendix 8.7 [APP-092] concludes these records are within</p>	We have now reviewed the Appendix 8.7 [APP-092] and the maps in the Biodiversity Book of Figures [AS-050] in addition to the HRA Screening Report [AS-068]. Whilst the city of Cambridge lies between the SAC and the proposed development, we appreciate the examiner's concerns that it cannot be certain that the recorded barbastelles are not

Table 2: Natural England's response to Examiner's initial questions			
ExA question ref	Question addressed to	Question	Answer
		<p>the foraging range of Eversden and Wimpole Woods Special Area of Conservation (SAC). The HRA Screening Report [AS-068] concludes that there is no ecological connectivity between the Proposed Development and the SAC. Please provide an explanation for the discrepancy in these conclusions.</p> <p>To Natural England: Please comment on the relevance of these findings in relation to your agreement to the conclusions of no Likely Significant Effects on the barbastelle feature of Eversden and Wimpole Woods SAC.</p>	<p>connected to the SAC. It would therefore be best to take a precautionary approach and include Eversden and Wimpole Woods SAC in the Appropriate Assessment (AA) stage, where mitigation measures can be taken into account.</p> <p>Appropriate mitigation, such as an ecologically sensitive lighting strategy and the retention and enhancement of vegetation corridors, particularly along the disused railway line, as proposed, is likely to enable an AA conclusion of no adverse effect on the integrity of the SAC.</p>
ExQ1.5.62	NE	<p>Questions relating to Habitats Regulations Assessment (HRA) The Applicant has provided an updated HRA Screening Report [AS-068] and HRA Report [AS-070]. Please confirm whether the comments raised in your RR [RR-015] are maintained in light of this?</p>	<p>Except for the change of advice relating to Eversden and Wimpole Woods SAC, as described in our answer to ExQ1.5.60, we are happy that these submitted documents satisfy our RR issue 1a and we have no further comments relating to the HRA Screening Report [AS-068] or HRA Report [AS-070].</p>
ExQ1.7.29	Applicant, NE	<p>Mitigation measures – monitoring of recreational pressure On page 14 of ES Chapter 11 [AS-028] Natural England suggests surveys of PRow usage to inform the assessment of recreational pressure impacts. Whilst the Applicant refers to surveys undertaken to inform the application, new recreational routes are proposed as part of the application. Would it be preferable to undertake surveys / monitoring during the operational phase to identify any changes in behaviour and any proportionate mitigation? If so, how would the surveys and a means to subsequently agree mitigation be secured?</p>	<p>Yes, it will be necessary to undertake surveys and monitoring during the operational phase, however, comparable surveys and monitoring will also be required before and during the construction phase to establish baseline data. The survey effort to date does not provide adequate data to act as a baseline. Natural England's advice is that the applicant should engage recreational disturbance/visitor management specialists to undertake survey work and to create and help implement a suitable methodology, including measurable indicators and triggers for mitigation and management measures to be developed and delivered. These measures should be prepared and agreed through the partnership approach referred to in our RR [RR-015]. We also suggested in our RR that this should be secured through a strengthened commitment in the LERMP. We request that this aspect of the LERMP is improved at this</p>

Table 2: Natural England's response to Examiner's initial questions			
ExA question ref	Question addressed to	Question	Answer
			<p>stage so that it can be adequately secured, rather than relying on the promise of potential updates later which may be unfulfilled or carry less weight. It is appreciated that the details of this topic will need to be completed later, but as stated in issues 2a, 7a, and 7e of our RR (Table 1), much stronger, clearer commitments now would reassure us that this issue will be adequately addressed.</p> <p>We also requested that the related RR issue 7d should be secured through the LERMP, although the emerging Local Nature Recovery Strategy (LNRS) could be an additional mechanism for securing delivery – see suggested commitment below.</p> <p>We suggest commitments to be added to the LERMP [AS-066] and Commitments Register [AS-125] should be along the lines of:</p> <ul style="list-style-type: none"> - AW will engage recreational disturbance/visitor management specialists to review and improve the methodology for assessing the effects of the PRoW enhancements, including the bridleway link, on the natural environment, particularly Stow cum Quy Fen SSSI. This will include establishing stronger baseline data in the design and construction phases, and comparable frequent long-term monitoring during the operation phase, to be assessed against indicators and triggers. - AW will establish a partnership group including Cambridgeshire County Council, the Wildlife Trust, National Trust, Natural England and other interested stakeholders, which the recreational pressure monitoring results will be reported to on an annual basis, or as soon as specified 'early warning' triggers have been reached. This partnership will also be consulted on the mitigation and management

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			<p>measures required to address the issues, and specialists will be involved if necessary.</p> <ul style="list-style-type: none"> - AW will seek to compensate for loss of Green Belt land within the Cambridge Nature Network by delivering strategic enhancements for the local nature recovery network. Suitable opportunities will be identified through the emerging Local Nature Recovery Strategy (LNRS) and AW will cooperate with the LNRS Responsible Authority (and recreational pressure partnership group members) to agree a proportionate approach.
ExQ1.21.5	Applicant NE, EA	<p>WINEP guidance To what extent has the water industry national environment programme (WINEP) guidance (DEFRA, 2022) influenced the Proposed Development and what effect does it have on the assessment of this proposal?</p>	<p>Through engagement with the Applicant we are aware that neither the current Cambridge WRC or the Proposed Development form part of the current or next cycle WINEP list. However, we understand that the proposed permit requirements for the Proposed Development aim to meet the ambitions and objectives of the WINEP programme. Natural England has no further comments to make on this aspect of the Proposed Development.</p>
ExQ1.21.11	Applicant, NE	<p>Update following meeting Please provide an update regarding the meeting referenced in the RR from NE [RR-015] regarding hydrology.</p>	<p>A joint meeting was held on 22-08-2023 between Anglian Water, Natural England and the Environment Agency, where the proposals for groundwater protection and monitoring were discussed. It was agreed that an Outline Water Quality Monitoring Plan would be produced by AW and that it would be checked and agreed by EA. We look forward to receiving this document once it has been finalised, and will then check that it resolves our relevant RR issues, as anticipated.</p>
ExQ1.21.55	EA, NE	<p>Water supply A number of RRs refer to an objection from the EA and NE in June 2023 to the increase in housing in Cambridgeshire on the grounds that supplying water to these homes would pose</p>	<p>Natural England has recently submitted 'holding objections' to a number of planning applications for major housing and industrial /technology developments across Greater Cambridge. We have advised Greater Cambridge Council to</p>

Table 2: Natural England's response to Examiner's initial questions			
ExA question ref	Question addressed to	Question	Answer
		a significant risk to the local water supply and would also bring about harm to the environment – can you confirm whether this was the case and the context of this objection?	<p>ensure their determination of the planning applications is informed by evidence of the availability of sufficient water resources to meet the needs of the new development/s, in-combination with other proposed development, without adverse impact to the water environment and groundwater dependent designated sites. The context of our objections is the evidence being gathered by the Environment Agency, Natural England, water companies and others, to inform the Integrated Water Management Study (IWMS) for the Greater Cambridge Local Plan. This indicates that groundwater abstraction from the Cambridge aquifer, to meet current needs, is already contributing to environmental deterioration including impacts on water dependent Sites of Special Scientific Interest (SSSIs) and supporting habitat. In our response to consultation on the IWMS we have highlighted those SSSIs we believe to be at particular risk; however, further data is still being gathered to identify the full suite of potentially affected sites.</p> <p>Water resources, particularly groundwater, are highly stressed across Greater Cambridge and wider East Anglia. The Cam and Ely Ouse Chalk aquifer is failing to meet its water quantity standards and there are numerous river catchments where flows are failing to meet their environmental requirements, with the hydrological regime of SSSIs causing conditions that are too dry to maintain their notified features of interest. It is now widely accepted that the region is facing a 'water crisis' due to over-abstraction of the groundwater resource that is the life-support of water dependent designated sites and other important habitats. There is significant uncertainty around the availability of water supply, from groundwater in the Cambridge aquifer, to meet growth needs without contributing to environmental deterioration – until alternative supply options can be</p>

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ExA question ref	Question addressed to	Question	Answer
			<p>identified and implemented. In the absence of alternative supply options we are not confident that water resources to meet the needs of any new major development across Greater Cambridge, alone and in-combination with other proposed development, can, at this point in time, be supplied sustainably and without adverse impact to statutorily designated sites and wider ecology, in accordance with the relevant policies of the adopted South Cambridgeshire Local Plan including Policy CC/7: Water Quality. Natural England has no principle objection to the proposed developments per se. Our concern is that the water crisis has now reached a potential 'tipping point' and that, until alternative water supply sources and/or measures to reduce further groundwater abstraction become available, careful consideration is required, by the Council, as to whether any major new development can be delivered sustainably and without contributing further environmental degradation. This is the basis of Natural England's holding objections to the relevant planning applications. Our position is explained more fully in a written statement submitted to the Planning Inspectorate (16 June 2023 ref. 436374).</p>
ExQ1.21.59	EA, CCC, CCoC, SCDC, NE	<p>Review of additional information Please review and comment on the additional information provided by the Applicant in response to the ExA's Procedural Decision [PD-004], regarding the impacts of the Proposed Development on water resources with particular reference (but not limited to): the oOMMP [AS-073], Appendix 20.5 Fluvial Modelling Report [AS-113] and Appendix 20.6 3D Velocity Mixed Model [AS-114].</p>	<p>See our answer to ExQ1.5.14 for comments on the oOMMP [AS-073] and other additional information. We do not have any comments to make on Appendix 20.5 Fluvial Modelling Report [AS-113] and Appendix 20.6 3D Velocity Mixed Model [AS-114] as these do not relate to matters within Natural England's statutory remit.</p>

Natural England's Written Representations

PART IV: Natural England's detailed comments on the Development Consent Order (DCO) and associated documents

Natural England's Written Representations, Part IV, Table 3

Page	DCO/DML or Omission ref	Natural England's comments	Risk (Red/Amber/Green)
52	DCO Requirement 10 Outfall	Natural England welcomes this essential requirement. We advise that requirement 10(1) should also include the requirement for approval by the Environment Agency and Natural England, in addition to the relevant planning authority, or for the relevant planning authority to consult with these bodies prior to approval.	Amber
53	DCO Requirement 11 Landscape, Ecology and Recreation Management Plan	Natural England welcomes this essential requirement. We advise that requirement 11(1) should also include the requirement for approval by Natural England, in addition to the relevant planning authority, or for the relevant planning authority to consult with Natural England prior to approval.	Amber
54	DCO Requirement 16 Contamination risk	Natural England welcomes this essential requirement. We advise that the contamination of water should also be reported, investigated, and remediated if necessary, not just land-based contamination.	Amber

[Intentionally left blank]