Cambridge Waste Water Treatment Plant Relocation Project
Anglian Water Services Limited

Applicant's Responses to the Examining Authority's Written Questions

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1	20/11/23	-	Submitted to ExA at Deadline 1

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1. General and Cross Topic Questions

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Please provide a list of all plans and other documents that will require Secretary of State (SoS) certification (including plan / document references) should the application be consented. This should be updated throughout the examination process for ease of tracking document versions and a final list supplied to the Examining Authority (ExA) before the close of the examination.</td><td>The plans and documents which will require Secretary of State certificate, including documents references, are set out in Schedule 18 of the dDCO. As at Deadline 1, the documents are:
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5.4.6.1</td><td>April 2023 Revision 03 subject to the following revisions:

(i) Addendum to the environmental statement – October 2023 Revision 01

(ii) Volume 2 Chapter 2 – Project Description – November 2023 – Revision 03

(iii) Volume 2 Chapter 17 – Noise and Vibration – November 2023 Revision 04

(iv) Volume 4 Chapter 6 – Baseline Agricultural Land Classification – November 2023 Revision 03</td></tr>
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				5.4.8.19	(v) Volume 4 Chapter 8 – Waterbeach Pipeline Arboricultural Impact Assessment – November 2023 Revision 03
				5.4.13.4	(vi) Volume 4 Chapter 13 – Historic Environmental Impact Assessment Tables – November 2023 Revision 03
				5.4.14.1	(vii) Volume 4 Chapter 14 – Preliminary Risk Assessment Report – November 2023 Revision 03
				5.4.19.7	(viii) Volume 4 Chapter 19 – Construction Traffic Management Plan – November 2023 Revision 04
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			Framework archaeological investigation mitigation strategy	5.4.13.8	September 2023 Rev 01
			The land plans	4.4	
			Key Plan	4.4.0	SAV_AW_CAM_DCO_4.4.0_01-Rev 02

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			Landscape, ecological and recreational management plan	5.4.8.14	September 2023 Revision 02
			Lighting design strategy	5.4.2.5	January 2023 Revision 01
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			Sections design plan- sewer tunnel and longitudinal section; design plan – outfall final effluent longitudinal section; design plan – outfall storm pipeline longitudinal section; design plan – outfall cross sections; design plan – outfall river frontage; design plans – waterbeach pipeline long sections; Key Plan	4.12 4.13.1 4.13.2 4.13.3 4.13.4 4.14 4.14.0	00001-100006-CAMEST-ZZZ-LAY-Z-9807-Rev C01 00001-100006-CAMEST-ZZZ-LAY-Z-9803-Rev C01 00001-100006-CAMEST-ZZZ-LAY-Z-9804-Rev C01 00001-100006-CAMEST-ZZZ-LAY-Z-9805-Rev C01 00001-100006-CAMEST-ZZZ-LAY-Z-9806-Rev C01 00001-100006-CAMEST-ZZZ-LAY-Z-9000-Rev C02
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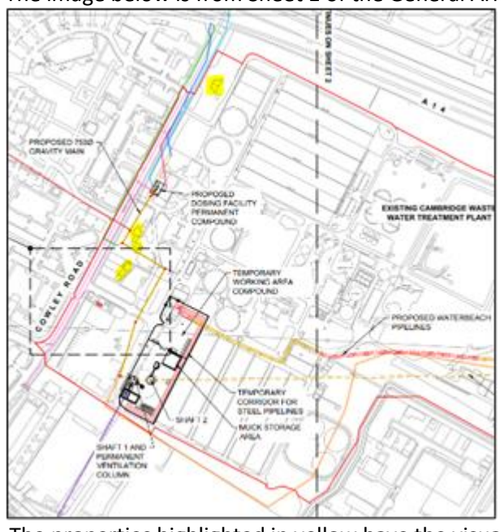
<tr><td>1.2</td><td>Applicant</td><td>Plans and Documents
Figure 1.1 of Guide to the Application [AS-138] refers to “Main construction (first phase)” and to “Extension – 2nd phase (from 20p36)”. Please provide a drawing indicating the extent of each phase.</td><td>The Applicant has produced a plan which sets out the extent of each phase (see 4.8.18 1Phased Construction Layouts provided at deadline 1)
This plan shows the 2nd phase extension includes the addition of 1No Primary Settlement Tank and 1No Final Settlement tank and associated electrical and mechanical connections as described in Environmental Statement Volume 2 [APP-034] 2.15.2, 3.2.1, 3.2.9 of the Project Description</td></tr>
<tr><td>1.3</td><td>Applicant</td><td>Plans and documents
Cambridgeshire County Council’s (CCoC) Relevant Representation (RR) [RR-001] sets out a number of issues relating to the Works Plans [AS-150], the General Arrangement Plans [AS-149] and the Design Plans – Highways and Site Accesses [APP-025]. Please address these matters and update the plans as necessary.</td><td>The Applicant will address all the points raised in the CCoC [RR-001] regarding the updating of the relevant Works Plans (App Doc Ref 4.3) [AS-150], the General Arrangement Plans (App Doc Ref 4.2) [AS-149] and the Design Plans – Highways and Site Accesses (App Doc Ref 4.11) [APP-025]. The outcomes will be recorded in the Statement of Common Ground.</td></tr>
<tr><td>1.4</td><td>Applicant</td><td>‘Future works’
Regarding the ‘Future Works’ as shown on Sheet 11 of the Works Plans [AS-150]:
Are these related to ‘Phase 2’, and what specifically would these works involve;</td><td>The area identified for ‘Future Works’ is not intended to have a separate work number. The area does fall within Work No. 23 (landscaping and ecological works) and therefore those works listed in Schedule 1 of the DCO such as earthworks and ground re-profiling will be carried out on this land. It is also intended that</td></tr>
</table>

ExQ1	Question to	Question	Response
		Does the draft Development Consent Order (dDCO) provide for them to be implemented and make it clear what the works would be; and Have the works been taken into account in all relevant assessments?	the "Further Works" described in Schedule 1 of the DCO might be undertaken on this land where necessary (such as fencing, temporary construction works etc.). The area is also separately identified on the Works Plans as accommodating 'Future Works' because this area is not specifically required for the other named works described in the DCO, but it may accommodate the expansion of the treatment works within the earth bank through future modification, enhancement or optimisation as explained in the Project Description Chapter of the Environmental Statement (Document Reference 5.2.2) (see paragraphs 2.15.3 – 2.15.5) and the Planning Statement (Document Reference 7.5) (see paragraphs 1.3.3, 1.7.4, 2.2.14 and 4.8.12). The potential 'Future Works' are not related to Phase 2. The draft DCO does not provide for the Future Works to be implemented, any planning consent required will be pursued at the relevant time. There are no works to be considered for assessment.
1.5	Applicant	**Legal agreements** Paragraph (para) 57 of the National Planning Policy Framework (NPPF) states that planning obligations should only be sought where they meet all of the following three tests: • Necessary to make the development acceptable in planning terms. • Directly related to the development. • Fairly and reasonably related in scale and kind to the development. Please provide evidence that the Draft s106 Obligations [AS-127 and AS-134] meets these tests; Confirm whether the matters outlined in the s106 Heads of Terms are backed up, or justified, by planning policy (including National Policy Statement for Waste Water (NPSWW) and development plan(s) policy) and / or supplementary planning documents? Could the matters outlined in the s106 Heads of Terms be secured by way of a dDCO Requirement (R)? Without the s106 agreements, would there be a harmful effect?	The Applicant currently proposes two Section 106 Obligations on Anti-Social Behaviour (App Doc Ref 7.16) [AS-127] and Parking (App Doc Ref 7.9) [AS-134]. There is some evidence of limited existing anti-social behaviour instances in the area marked blue on Plan 2 of AS-127. In the event of increased anti-social behaviour in this area as a result of the Proposed Development, including the use of the proposed new bridleway, this Section 106 allows for a payment to be made to the County Council to make highway applications as set out in Schedule 1 which it is believed could significantly reduce such activity. The provision would only be triggered by anti-social activity arising from the Proposed Development (including the proposed new PROW) and so this Section 106 is directly related to the Proposed Development. This provision also is fairly and reasonably related in scale and kind to the development. This Section 106 is justified by criterion o of Policy HQ/1: Design Principles of the adopted South Cambridgeshire Local Plan 2018 requires new development to design-out crime and create an environment that is created for people that is and feels safe. The second Section 106 on Parking (App Doc Ref 7.9) [AS-134] provides for a parking monitoring scheme in the first instance and dependent on the outcome, the potential for payment towards a Traffic Regulation Order. This applies to the area shown on Plan 2 of AS-134. The purpose of this Section 106 is to address the potential for parking issues occurring as a consequence of the new bridleway and permissive paths being proposed by the Applicant. In the event that parking problems occur in the area of Plan 2 then the Section 106 is necessary to make the development acceptable in planning terms. It is also fairly and reasonably related in scale and kind to the proposed development. It is also directly related to the development. This Section 106 is supported by criterion 2c of Policy TI/2 of the South Cambridgeshire Local Plan 2018 which includes protection and improvement of existing cycle and walking routes, including the Rights of Way network and ensure the effectiveness and amenity of these routes is maintained. It is considered that the above matters could not be secured by way of a dDCO Requirement due to the potential need for a financial payment to be made and the involvement of a third party (Cambridgeshire County Council) to secure the mitigation. Without the Section 106 agreements there may be a harmful effect subject to the monitoring being proposed.
1.6	Applicant	**Legal Agreement**	The Applicant has considered these requests and is not willing to enter into such agreements.

<table>
<tr><th>ExQ1</th><th>Question to</th><th>Question</th><th>Response</th></tr>
<tr><td></td><td></td><td>CCoC's RR [RR-001] refers to potential s106 agreements relating to PRoW improvements, heritage interpretation and a Community Fund. Has the Applicant considered this and would it be willing to enter into such agreements?</td><td>In respect of footpaths, the Applicant is already proposing to deliver a significant PRoW improvement through the delivery of the proposed bridleway. A survey of public paths in the vicinity of the development suggests that the path network is broadly well maintained and not in need of improvement. There is therefore no linkage between the proposed development and requested contribution for PRoW improvements; such a contribution would not be compliant with planning law or policy.

Discussions with CCoC have identified the requirement to install dismounting and mounting blocks and related signage on the Horningsea Road to facilitate equestrian usage of the road bridge over the A14. The mechanism for securing these blocks is under discussion; it is currently proposed that a s.106 contribution could be made in respect of these limited improvements.

In respect of heritage interpretation, the Landscape, Ecological and Recreational Management Plan ("LERMP", (App Doc Ref 5.4.8.14) AS-066) provides for interpretation boards - see paragraphs 3.5.13 and 3.5.15. The LERMP is secured by DCO requirement 11.

In respect of a community fund, the Environmental Statement has not identified any potential impacts which the operation of a community fund would mitigate. Therefore, there is no linkage between the proposed development and requested contribution; such a contribution would not be compliant with planning law or policy. Anglian Water operates a variety of community outreach initiatives in respect of its operational assets and the relocated plant would fall within that wider corporate activity.</td></tr>
<tr><td>1.7</td><td>Applicant</td><td>Clarification of receptors for purposes of the assessments
The image below is from Sheet 1 of the General Arrangement Plans [AS-149]:
 

The properties highlighted in yellow have the visual appearance of residential properties. Please confirm their lawful planning use. If they are residential properties, please confirm whether the impacts of the Proposed Development on these properties have been taken into consideration within the ES, notably in relation to noise and vibration and odour</td><td>The Applicant has summarised the information requested in the table below.
<table>
<tr><th>Property address</th><th>Lawful Planning Use</th><th>Current use</th><th>Owner</th><th>Included in the ES Chapter – Odour</th><th>Included in the ES Chapter – Noise and vibration ≠</th></tr>
<tr><td>18 Cowley Road</td><td>Residential</td><td>Residential</td><td>A company within the Applicant's group of companies</td><td>See note 1
Negligible' based on the frequency, intensity and duration of any effects, the source odour potential, pathway effectiveness, and sensitivity of receptors.[1]</td><td>RC16 within the Noise and Vibration Chapter assessment of impacts from construction and decommissioning noise and vibration as shown in Figure 17.1 (App Doc Ref 5.3.17) [APP-064] is representative of this sensitive receptor.</td></tr>
<tr><td>20 Cowley Road</td><td>Residential</td><td>Residential</td><td>A company within the Applicant's group of companies</td><td>As above.</td><td>RC16 within the Noise and Vibration Chapter assessment of impacts from construction and decommissioning noise and vibration</td></tr>
</table></td></tr>
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ExQ1	Question to	Question	Response					
								as shown in Figure 17.1 (App Doc Ref 5.3.17) [**APP-064**] is representative of this sensitive receptor.
			22 Cowley Road	Residential	Residential	A company within the Applicant's group of companies	As above.	RC16 within the Noise and Vibration Chapter assessment of impacts from construction and decommissioning noise and vibration as shown in Figure 17.1 (App Doc Ref 5.3.17) [**APP-064**] is representative of this sensitive receptor.
			The Stables (part of existing WWTP)	Office	Office	The Applicant	Represented by Receptor 13, Table 1-2, Appendix 18.1 (App Doc Ref 5.4.18.1) and Figure 18.2, Book of Figures: Odour (App Do Ref 5.3.18).	
			4a Cowley Road	Residential	Residential	A company within the Applicant's group of companies	See note 1 Negligible' based on the frequency, intensity and duration of any effects, the source odour potential, pathway effectiveness, and sensitivity of receptors.[1]	Represented by RC14 within the Noise and Vibration Chapter assessment of impacts from construction and decommissioning noise and vibration as shown in Figure 17.1 (App Doc Ref 5.3.17) [**APP-064**].
			4b Cowley Road	Office	Office	A company within the Applicant's group of companies	Represented by Receptor 13, Table 1-2, Appendix 18.1 (App Doc Ref 5.4.18.1) and Figure 18.2, Book of Figures: Odour (App Doc Ref 5.3.18).	As above.
			1. Construction and decommissioning impacts were assessed at three receptors (Receptor 12, 13 and 14) along Cowley Road outside of the DCO limits with ES Chapter 18: Odour (App Doc Ref 5.2.18) [AS-050] and Appendix 18.1 (App Doc Ref 5.4.18.1) [APP-137]. All of these were assessed to have a 'Negligible' impact. The property was assumed to be vacated therefore further review has been completed for the identified properties.					

ExQ1	Question to	Question	Response
			At the identified receptors within the DCO limits, it is concluded that the odour effect is also expected to be 'Negligible' based on the frequency, intensity and duration of any effects, the source odour potential, pathway effectiveness, and sensitivity of receptors. Of particular note, when determining the receptor sensitivity in this case, the FIDOL factors have been considered and whilst the receptors identified within the DCO limits are residential, they have been assessed to be of 'medium' sensitivity due to their location, their tolerance and the expectations of the receptor with regards to odour. This is on the basis the receptor is adjacent to the existing Cambridge WWTP where the is the potential for odour currently. On this basis, no further mitigation measures in addition to those included within the assessment are required. In relation to community effect the assessment of residential properties on Cowley Road considered temporary and permanent requirements for land; temporary and permanent changes to amenity and temporary changes to access. No significant effects were identified on residential properties on Cowley Road during decommissioning and this applies to the identified properties,
1.8	Applicant	**Other consents and licences** The Consents and Other Permits Register [AS-123] confirms that otherconsents, licences and permits would be required for the Proposed Development. Please provide an update on any progress with obtaining these consents, licences and permits include a section providing an update on them in any emerging Statements of Common Ground (SoCG) that are being drafted with the relevant consenting authorities.	The Applicant will insert into the Consents and Other Permits Register (App Doc Ref 7.1) [**AS -123]** a new column with an update on status. Statements of Common Ground with the relevant consenting authorities will also have updates for other consents, Licences and permits where relevant.
1.9	Applicant	**Other consents and licences** Appendix A, Table 1.1 relating to noise [AS-123] suggests that s61 consent may be needed in relation to noise during construction, and that the Applicant is *Not seeking to disapply this consent within the DCO*. However, it goes on to say that *…the DCO does include a statutory defence and disapplies s61(9) COPA 1974*. Please clarify.	The DCO does not disapply s61. However, Article 9 provides a statutory defence should proceedings be brought under s82 (summary proceedings by a person aggrieved by statutory nuisance) in relation to a nuisance falling within s79 (statutory nuisances). If proceedings are brought and the Applicant shows that the nuisance is attributable to the carrying out of the authorised development in accordance with a notice served under s60 (control of noise on construction sites) or s61 (prior consent for work on construction sites), no order or fine may be imposed (see Article 9(1)(a)). The Applicant is not therefore intending to disapply the need for a consent under section 61. The Applicant is just providing a defence.
1.10	Applicant	**Other consents and licences** Appendix A, Table 1.1 [AS-123] indicates that the Applicant would need to seek Building Regulations approval for some aspects of the Proposed Development, such as the Gateway building. However, this entry also appears to state that the Applicant is seeking to disapply such consent (seemingly through Schedule 17 para 3 of the dDCO). Please clarify this matter.	The Applicant can confirm that it is not seeking to disapply the need for Building Regulation approval and will amend the Register and disapplication in the DCO.
1.11	Applicant	**Other consents and licences** CcoC's RR [RR-001] refers to a need for agreements under s278 of the Highways Act 1980. Should this be added to the consents and permits document [AS-123]?	The Applicant has transposed the s278 requirements into the protective provisions of the dDCO and therefore deem this permit not to be necessary.
1.12	Applicant	**Significant Effects** Please provide a summary table listing all residual likely significant effects identified within the ES chapters.	The Applicant refers to Table 'Q1.12 Summary of residual significant effects' appended to this document (**Appendix A**). In reference to this Table note that there is an update in relation to the significant effect reported in relation to ditches that will be updated to account for compensatory habitat that removed the significant effect. Chapter 8 will be updated at Deadline 2 as it requires amendment however as the Applicant is currently in the process of engaging land owners on revised BNG figures the Applicant deems it more efficient to update the chapter as a whole at Deadline 2 along with the revision to the BNG figures.
1.13	Applicant, Cambridge City Council (CCC), South Cambridgeshire	**Planning applications** Please provide an update on any planning applications that have been submitted or determined since the DCO application was submitted that could either affect the Proposed Development or be affected by the Proposed Development and whether these would affect the conclusions reached in the ES.	The Applicant refers to an updated Table 2.7 'Long list of development' from the ES Chapter 22: Cumulative Effects Assessment (App Doc Ref 5.2.22) [**AS-044**] (provided at **Appendix B** of this document). The table includes a column 'Scale and nature of development likely to have significant impact?' which includes text to explain how new developments have been considered. The addition of new developments has been agreed with the City and District Councils. The Applicant is satisfied that that the updates do not

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	District Council (SCDC)		alter the conclusions in relation to residual significant cumulative effects. The Applicant will provide an updated ES Chapter 22: Cumulative Effects Assessment (App Doc Ref 5.2.22) at Deadline 2 showing the assessment of the updated list. ES Chapter 22 requires amendment however as we are currently in the process of following up in relation to Waterbeach station arrangements the Applicant deems it more efficient to update the chapter as a whole at Deadline 2 to account for any further details in relation to the station relocation. ES Chapter 22: Cumulative Effects Assessment (App Doc Ref 5.2.22) [**AS-044**] reported that in respect of ecology, landscape and visual, traffic and transport and water resources, although there were no likely significant cumulative effects, there was a requirement for an interface plan between the Proposed Development and the Waterbeach Railway Station so that construction phase issues could be managed. Similar requirements in relation to coordination with other schemes are identified as being required in order to management construction phase issues. These relate to the following developments should construction overlap with the construction of the Proposed Development: • 23/01509/FUL Vitrum Building St Johns Innovation Park Cowley Road • 23/01878/FUL Change of use and refurbishment of existing car showroom • 23/00835/FUL Taylor Vinters Merlin Place 460 Milton Road Cambridge Cambridgeshire 23/02953/SCOP • 23/02953/SCOP Cambridge Science Park Milton Cambridge South Cambridgeshire CB4 0WA This is to make sure that there is co-ordination in relation to managing cumulative effects in particular minimising visual impacts of temporary works and developing aligned traffic control measures. The Applicant has updated Section 3.4. and 3.5 of the CoCP Part B (App Doc Ref 5.4.2.2) which is being provided at Deadline 1 to clarify the requirements in relation to coordination with third parties where there is the potential for cumulative impacts.
1.14	CCC, SCDC Cambridgeshire County Council (CCoC), Interested Parties (IPs)	**Other Projects and Proposals** Are there any other projects that are not documented in the ES that are relevant and need to be considered by the ExA? If so, please identify these projects and the public information source(s) from which you have made your assessment that they are relevant.	
1.15	Applicant, CCC, SCDC	**Previous planning applications – Waste Water Treatment Plant (WWTP) Relocation** Please provide details of any planning applications submitted previously regarding a potential move of the existing WWTP to the proposed site or any other site, as alluded to in some RRs (e.g. [RR-121, RR-304 and RR-178]). Please include full details of what was proposed, the outcome of the application and full reasoning behind the decision made.	The Applicant is not aware of any planning applications submitted previously regarding a potential move of the existing Cambridge WWTP to the proposed site, or any other site. The Applicant believes stakeholders may be referring to Cambridgeshire County Council's proposed allocation, in the Minerals and Waste and Plan, for a waste water treatment plant in the Honey Hill area, in 2006. The allocation was not taken forward in the Minerals and Waste Plan because the relocation of the waste water treatment plant was not financially viable. Please see the Applicant's answer to ExQ1 2.9.
1.16	Applicant, CCC, SCDC	**Potential conflicts of interests** A number of RRs (e.g. [RR-194, RR-225 and RR-262]) suggest CCC's and SCDC's involvement in the Examination gives rise to a conflict of interest given land interests and desire for the redevelopment of the existing WWTP site and wider area. Please comment on this.	The statutory function of a local planning authority is separate from its role as a landowner. As a result, the Applicant believes there are no conflicts of interest.
1.17	Applicant	**Associated development** The 'Guidance on associated development applications for major infrastructure projects' (DCLG 2013) and in particular para 5(i) states that associated development should either support the construction or operation of the principal development, or help address its impacts. Please explain how the Discovery Centre, the amount of office space, amount of parking and the workshop meet these criteria.	The Gateway Building that is proposed to be delivered under the DCO for the Cambridge WWTP Relocation Project is a condensed replacement of the office facilities currently located at the existing Cambridge WWTP. Anglian Water employees would use the proposed Gateway Building in the same way as the existing facilities. The Applicant does not propose to increase this usage or materially change its functional operation or employment types currently using the existing Cambridge WWTP. For clarity, the Applicant is not proposing to relocate staff from its other regional offices to the proposed Gateway

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			Building at the proposed WWTP, something which was incorrectly asserted by the Save Honey Hill Group at the issue specific hearing. The Discovery Centre is planned as a mixed-purpose multifunctional area. The layout is shown in the Design and Access Statement, page 168 (App Doc Ref 7.6) [**AS-168**]. The Applicants RES (now WROL, Water Recycling Operational Logistics) operation that involves the management, logistics, planning, operation and coordination of its sludge tankers and cake distribution is based out of the existing Cambridge WWTP. This functional linkage arises from the geographical location of the WWTP in relation to the region Anglian Water serves as a Waste Water services provider. The Applicant utilises most of its large combined WWTP/STCs as administrative hubs to run many of its related regional operations from offices located on those sites. In addition to WROL team, there is a small Water Resources team that also use the offices at the existing WWTP as their base of operations. The number of car parking places for operational staff based at the proposed site under the dDCO is 46, representing the maximum number of vehicle movements assessed in the environmental statement (92). This includes 30 parking spaces associated with the WROL and water resources operations described above. As discussed at 1.25 below, further parking spaces are proposed for cars belonging to tanker drivers (6), additional operational visitors (2) and contingency spaces (5). A further 20 spaces, outside of the bunded area, are provided for "by invitation" visitors to the Discovery Centre. The table at Appendix F of the responses to ExA's first questions identifies those roles which are currently located at the existing WWTP and which would be relocated to the proposed WWTP. Note that the number of roles is greater than the number of office spaces because of part-time or flexi- working. All elements of these works therefore support the operation of the authorised development or are functionally linked to it. The Applicant considers that they firmly fall within the criteria of what would constitute "associated development". The Applicant refers to its position as explained in the Explanatory Memorandum (App Doc Ref 2.2, [**APP-010**]) in this regard at paragraphs 1.8 to 1.16. The Explanatory Memorandum considers the associated development in the context of the Guidance. The matter was also discussed at Issue Specific Hearing 2 (see paragraph 2.8.3 of the Post-Hearing Submission (App Doc Ref 8.6) where the context of the offices and the Discovery Centre as associated development was specifically discussed.
1.18	Applicant	**Project scope and cumulative assessment** Given that there is a clear link between the Proposed Development and the demolition, remediation and redevelopment of the existing WWTP site (as mentioned in a number of application documents): a) Further justify your view that for the purposes of ES Chapter 22 Cumulative Effects Assessment [AS-044], these works fall under Tier 3; b) Further justify the limited level of detail provided in section 3.9 of the cumulative assessment [AS-044]; c) Noting some RRs (e.g. [RR-051]), please explain how, without more detailed information in this regard, the information provided meets the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (such as section 4(2)); d) Noting reference (e.g. in [APP-008]) to the Court of Appeal's recent judgement in R. (oao Ashchurch Rural Parish Council) v Tewkesbury Borough Council [2023] EWCA Civ 101, please address the implication of this judgment for the application and the sufficiency of information provided; e) Notwithstanding the above judgment, para 3.1.3 of NPSWW requires the weighing of adverse impacts against benefits – please signpost to where in the application documents the adverse	**1.18 a)** The relationship between the Proposed Development and the redevelopment of the existing Cambridge WWTP site is summarised in the figure below, duplicated in a number of the application documents including Figure 1.1. of the Guide to the Application (App Doc Ref 1.3) [**AS-138** - page 5], the Planning Statement (App Doc Ref 7.5) [**AS-166**], the Environmental Statement Project Description (App Doc Ref 5.2.2) [**APP-034**] and the Design and Access Statement (App Doc Ref 7.6) [**AS-168**]. While there is a link between the relocation project and the redevelopment of the existing Cambridge WWTP site for housing (the former enables the latter), these are clear and distinct activities, carried out by different parties. The figure clearly sets out this separation, which can be further evidenced by the contractual arrangements with Homes England which place responsibility for the redevelopment activity on parties not associated with the Applicant. The redevelopment works (including demolition and remediation) fall outside the scope of the DCO application and are being carried out by other parties under a future planning permission, they therefore clearly do not constitute part of the proposed development for the purposes of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

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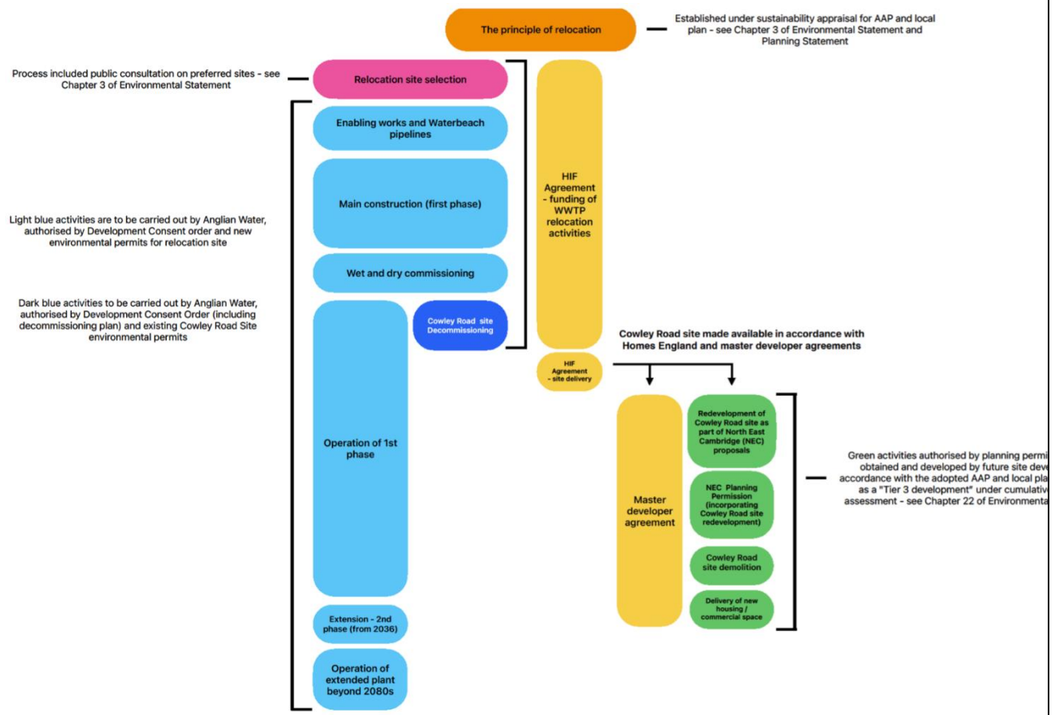
		impacts of any housing development are identified and then weighed against the reported benefits of housing; and f) Explain why the activities that would be required to remediate and prepare the existing WWTP site for development have not been included in the dDCO and ES assessments.	 The Applicant considers, however, through the application of the staged process set out in Planning Inspectorate Advice Note 17, that the redevelopment works could have the potential to constitute "*other existing development and/or approved development likely to result in significant cumulative effects"* (paragraph 3.1.1 of the Advice Note). That advice note sets out the criteria for assigning certainty to "other development", defined in accordance with the Advice Note and legal precedent as including existing developments and existing plans and projects that are "*reasonably foreseeable*". The tier 1 criteria relate to projects for which consent has been applied for, which have been granted consent but not implemented or which are under construction. Tier 2 applies to projects on the Planning Inspectorate's Programme of Projects for which a scoping report has been submitted. The redevelopment of the existing WWTP clearly does not fall into these two tiers. The applicant considers that the redevelopment of the existing WWTP site falls within Tier 3 which includes: • *development identified in the relevant Development Plan (and emerging Development Plans – with appropriate weight being given as they move closer to adoption) recognising that there will be limited information available on the relevant proposals; and* • *identified in other plans and programmes (as appropriate) which set the framework for future development consents/approvals, where such development is reasonably likely to come forward.* For this reason the redevelopment of the existing Cambridge WWTP site, including full decommissioning and demolition activities outside of the scope of the DCO, was included within the "other developments" long-list of the cumulative effects chapter (see lines 18, 19 and 21 of Table 2-6 at page 26 of **AS-044**).

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			1.18 b) and c) The level of information on the redevelopment of the existing Cambridge WWTP in the cumulative assessment represents what is available to the Applicant at the current time. It is consistent with Advice Note 17, which acknowledges that limited information will be available. In particular, attention is drawn to paragraph 3.1.4 of the Advice Note which states that the Planning Inspectorate acknowledges that the availability of information necessary to conduct the CEA will depend on the current status of the other development and 3.4.3 which recommends that in these Tier 3 instances, the applicant should aim to undertake an assessment where possible, although this may be qualitative and at a very high level. The Applicant considers it reasonable to conclude that the PINS guidance is intended to comply with the relevant legislative provisions and therefore that in complying with the Advice Note it is meeting the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. **1.18 d)** The applicability and relevance of this case to the application is limited. The Court of Appeal in *Ashchurch* was considering (inter alia) the question of what constitutes "the project" in connection with EIA screening and whether there had been a breach of the EIA regulations in concluding that EIA was not required. The question was whether a bridge which served no other purpose than to provide access to a future residential development had legitimately been considered as a separate project from the wider residential project which it would serve. In deciding that EIA was not required for the bridge application, the local planning authority failed to consider whether the bridge formed part of a wider project and in doing fell into legal error in breach of the EIA Regulations. The facts of the case can clearly be distinguished from the current application because (a) the new works are not an integral part of a wider project and will fulfil a standalone function of providing waste water treatment facilities serving the Cambridge catchment and the growing settlement at Waterbeach, (b) the Applicant, having voluntarily accepted that EIA would be required, scoped the current application under the EIA Regulations fully explaining the context in which it was coming forward and the Secretary of State acknowledged the Applicant's intention that the future potential redevelopment of the existing works would be considered as part of the cumulative assessment (see Scoping Opinion dated November 2021, pages 4 and 33), and (c) the Applicant has duly provided an ES and considered the future development as part of its cumulative assessment. **1.18 e)** The Applicant suggests that the weighing exercise proposed in this question is not the appropriate approach. In respect of the application, the Applicant submits that the correct approach is to weigh the benefits of the relocation (including the **enabling** of future housing growth) against the proposed development's adverse environmental effects (including the cumulative effects of the redevelopment and the housing growth so enabled, as reported in the cumulative effects assessment). This weighing exercise, which is guided by relevant planning policy, is described in the Planning Statement (App Doc Ref 7.5) [**AS-166**]. **1.18 f)** As described in the response to question 1.18 a) above, these activities do not form part of the Proposed Development. They are the responsibility of other parties involved in the redevelopment of the site in the future. Consent is not sought for these activities under the dDCO and therefore they are not included in its scope. The activities are assessed within the Environmental Statement Chapter 22. As described above in

ExQ1	Question to	Question	Response
			response to questions 1.18 a) - c) they are assessed as part of the cumulative effects assessment, drawing on the limited amount of information available for a Tier 3 project in accordance with Advice Note 17.
1.19	Applicant	**Cumulative assessment** ES Chapter 22, para 4.1.27 [AS-044] indicates that work is continuing to inform the assessment of cumulative effects with the Waterbeach Station development. Please provide an update, including in relation to the co-ordination of the proposed early works to tunnel beneath the Cambridge-King's Lynn railway line.	The Applicant is meeting periodically with the Waterbeach Development Company (WBDC) and SLC Rail in relation to the station relocation and new pumping station. These discussions are reflected in the SOCG. In relation to the assessment of cumulative impacts, the Applicant has not been informed of matters that require any change to the assessment as reported in ES Chapter 22: Cumulative Effects (App Doc Ref 5.2.22) [**AS-044**]. However this Chapter will be updated at Deadline 2 to incorporate an updated long list of developments and to account for further details in relation to the station relation that may come forward through the SOCG. In relation to proposals relating to early works, the Applicant has entered into discussions with Network Rail regarding the rail crossings and the necessary Basic Asset Protection Agreements (BAPA) this is also reflected in their Statement of Common Ground. The Applicant has amended the detail within Table 2-6: Cumulative Effects Long List of Developments within the ES Chapter 22: Cumulative Effects (App Doc Ref 5.2.22) [**AS-044**] to reflect the current understanding in relation to the Waterbeach station development. The details will be included in an update to ES Chapter 22: Cumulative Effects (App Doc Ref 5.2.22) [**AS-044**] that will be submitted at Deadline 2 as set out in the answer to ExQ 1.13 .
1.20	Applicant	**Future baseline** Please confirm the year(s) that the future baseline conditions represent for each ES aspect chapter and explain why the same future baseline date has not been used by all assessments in the ES?	The Applicant will include the following within the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1. This amendment includes further explanation of the future baseline and details relevant schemes as relevant to the revised long list presented as part of Q1.19. 3.6.3 Consideration has been given to any likely changes between the time of survey and the future baseline for the construction and operation of the Proposed Development. In some cases, these changes may include the construction or operation of other planned or consented developments in the area. Where such developments are built and operational at the time of writing and data collection, these have been considered to form part of the baseline environment. Otherwise planned future developments are considered within the assessment of cumulative effects. 3.6.4 The future baseline scenario based on a 2024 construction start year is therefore based on the reasonable assumption that planning permissions for consented development are delivered (or partially delivered) by 2024. Developments proposed to be within the future baseline are indicated within Chapter 22 Table 2-6 alongside cumulative schemes, in order to make this distinction clear, the consideration of developments considered as Future Baseline are set out in Table 3.1. **Table 3.1 Developments and status in relation to future baseline (appended to this document as Appendix C)** The Applicant also refers to the table in **Appendix D** to this document, which summarises approach to future baseline and associated assessment year. The Applicant has included relevant corrections relating to the appended table within the Environmental Statement Errata provided at Deadline 1.
1.21	Applicant	**Cumulative assessment** ES Chapter 22 [**AS-044**] assumes that an interface plan would be in place with the developers of the Waterbeach Station Relocation to mitigate any potential cumulative effects with the Proposed Development. Please provide an update on progress with the development of this interface plan. How will it provide mitigation for potential effects with the Proposed Development? How would the terms of any agreement be	The Applicant refers to section 4 of ES Chapter 22: Cumulative Effects Assessment (App Doc Ref 5.2.22) [**AS-044**], which identifies effects on biodiversity, landscape and visual amenity, and traffic and transport during construction of the Proposed Development in combination with the construction of the Waterbeach station relocation (planning reference S/0791/18/FL), and construction of the Waterbeach New Town East (S/2075/18/OL) and Waterbeach New Town West (Waterbeach Barracks) (S/0559/17/OL).

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		managed and through what means by the Applicant? Who would be responsible for any corrective action required?	Section 4 of ES Chapter 22: Cumulative Effects Assessment (App Doc Ref 5.2.22) [**AS-044**] also acknowledges a late start to construction of the Waterbeach pipeline may also require coordination of measures that run into the operational stage of the Proposed Development in relation to habitat reinstatement monitoring. Co-ordination with the parties delivering the Waterbeach station relocation (SLC Rail), Waterbeach New Town, and Waterbeach New Town East (Waterbeach Development Company) is required in order to resolve measures to avoid and or minimise cumulative impacts. ES Chapter 22: Cumulative Effects Assessment (App Doc Ref 5.2.22) [**AS-044**] refers to an interface plan; however, the Applicant confirms that in relation to securing the preparation of measures to avoid or minimise impacts arising as a result of the interaction with another project, section 3.4 of the CoCP Part B (App Doc Ref 5.4.2.2) includes a requirement for on-going engagement for the development of mitigation where there is the potential for cumulative effects. Any site specific measures required as a result any overlapping of construction activities will be included within a detailed CEMP. These measures will be developed and agreed though engagement with the SLC Rail, Waterbeach development company and Urban and Civic (as the developers of Waterbeach New Town) and included within the CEMP. Under Requirement 9 of the draft DCO (App Doc Ref 2.1) [**AS-139**], the Applicant would be required to prepare a detailed CEMP for approval by the local planning authority. Requirement 8 of the draft DCO (App Doc Ref 2.1) [**AS-139**] secures compliance with the CoCP. The Applicant would be obligated to implement measures incorporated into the approved CEMP. In relation to construction traffic movements, the Applicant is aware that SLC Rail are reviewing, with SCDC, the potential to utilize a haul road for their construction period that is not via Waterbeach village nor via Bannolds Drove but is accessed from the north of the site, from the Waterbeach New town development site itself. This is promoted to avoid access via the existing village and reduce the impact on the community. This proposed haul road location will form the subject of a separate planning application to SCDC.
1.22	Applicant	**Cumulative assessment** Please clarify the conclusions of the cumulative effects assessment in relation to the two phased developments, Waterbeach New Town East and Waterbeach Station that are considered in ES Chapter 22, Table 2-6 [AS-044] to be both partly within the future baseline and also considered in the cumulative effects assessment?	The Applicant refers to Section 4 of ES Chapter 22: Cumulative Effects Assessment (App Doc Ref 5.2.22) [**AS-044**], which identifies effects on biodiversity, landscape and visual amenity, and traffic and transport during construction of the Proposed Development in combination with the construction of the Waterbeach station relocation (planning reference S/0791/18/FL), and construction of the Waterbeach New Town East (S/2075/18/OL). As indicated in the response to 1.19, the Applicant has amended the detail within Table 2-6: Cumulative Effects Long List of Developments within ES Chapter 22: Cumulative Effects Assessment (App Doc Ref 5.2.22) to reflect the current understanding in relation to the Waterbeach station development. This update also covers Waterbeach New Town East. The Applicant will provide the updated ES Chapter 22: Cumulative Effects Assessment (App Doc Ref 5.2.22) at Deadline 2 as explained in the response to Q13. In relation to Waterbeach New Town East (S/2075/18/OL), there are no formal phasing plans available; the first phase is anticipated to be near the relocated station, but as this permission has not been granted and there is no certainty that this might happen. Should the construction commence prior to construction year 1, this would mean a small proportion of the overall development is future baseline with the majority to be delivered in a period that follows the construction phase of the Proposed Development. Any construction activities continuing throughout construction year 1 – 5 of the Proposed Development could give rise to cumulative effects.

ExQ1	Question to	Question	Response
			There are no overlapping operational activities that would spatially interact with the continued build out of the Waterbeach New Town East development that could result in cumulative effects. These being limited to occasional inspections of the Waterbeach pipeline. In relation to the Waterbeach station relocation (planning reference S/0791/18/FL), the Applicant has more certainty in relation to the overlap of activities. Waterbeach station is anticipated to be completed in 2025. Whereby construction would overlap with year 1 and 2 of construction of the Proposed Development meaning that particular attention is required in relation to the approach and timing of the Waterbeach pipeline sections in this location, as well as operation of the Waterbeach compound required for the construction of the Proposed Development. Waterbeach station is therefore a cumulative scheme in relation to construction of the Proposed Development and representative of future baseline in relation to the operational phase of the Proposed Development. Information reviewed in relation to the cumulative schemes is set out in section 3 of ES Chapter 22: Cumulative Effects Assessment (App Doc Ref 5.2.22) [**AS-044**]. The Applicant has engaged with both SLC Rail and WBDC in relation to overlapping activities from Autumn 2022 and has prepared Statement of Common Ground for each (App Doc Ref 7.14. 10 and App Doc Ref 7.14.19) to reflect where active discussions have reached agreement. ES Chapter 22: Cumulative Effects Assessment (App Doc Ref 5.2.22) [**AS-044**] recognises that the management of vehicle movements in the area of Waterbeach requires careful consideration in particular in relation to coordination between activities related to the Waterbeach station relocation and, should they have commenced, any activities associated with the initial stages of Waterbeach New Town East. The following sets out how overlapping activities are considered in ES Chapter 22: Cumulative Effects Assessment (App Doc Ref 5.2.22) [**AS-044**]. *Traffic and transport* Regarding construction traffic information related to the Waterbeach station development, the Applicant is aware of the following: • The construction route for vehicular access is from the A10 and following Denny End Road, Bannold Road and Bannold Drove to access the construction site. • Construction traffic routes will be managed by a Construction Environment Management Plan (CEMP) secured through a planning condition • The Transport Assessment in the current planning application did not include construction numbers. In discussions with SLC Rail/WBDC the Applicant has not been made aware of any recent vehicle movement estimates in relation to the station redevelopment. The contribution to vehicle movements in this location by the Proposed Development is associated the Waterbeach pipeline construction activities. It is anticipated that these activities will be highest during the first 8 weeks of construction when all the equipment including the pipe sections, pipe rings, plant and machinery are delivered to site and for the set up of the compound area (see Works Area 33, Sheet 10 (App Doc Ref 4.3.10) [**APP-017**]). Similarly, in the last 8 weeks of the programme activities and associated construction vehicle movements will also increase due to demobilization and reinstatement activities. Between these two periods, for 35-44 weeks, construction vehicle movements will reduce significantly and limited to one off deliveries for specific infrastructure items i.e., delivery of additional pipework and fittings, along with travel to and from site by operatives, supervisors, and managers along with associated visitors. For the 8 weeks before and after the 35-44 week period, construction movements associated with the Proposed Development are summarised as: • Construction vehicle movements travelling to work sites north of the A14: 82 daily

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			• Construction vehicle movements travelling to work sites south of the A14: 90 daily As there are no available data for predicted vehicle movements associated with the Waterbeach station construction, volumes prepared for a different but similar station (Cambridge North and Thanet Parkway, Kent) have been considered to inform an assessment of cumulative impacts. This sets construction traffic movements to 42 vehicle movements per day. The split between types of vehicles is assumed to be 12 HGVs and 30 cars/van/LGVs. The Applicant has reviewed the reasonable worst case that all vehicle movements would come from the nearest strategic or major road, for Waterbeach this is the A10. This review incorporates the assumed vehicle movements for Waterbeach station. In relation to traffic and transport impacts it is concluded that without any mitigation i.e. uncontrolled / unmanaged simultaneous use of the local road network by 3 projects in this location, that there could be cumulative adverse impacts in particular in relation to driver delay and fear and intimidation. In addition, there could be associated noise and air quality impacts in relation to these vehicle movements these would be temporary adverse impacts. In relation to traffic and transport impacts it is concluded that without any mitigation i.e. uncontrolled / unmanaged simultaneous use of the local road network by 3 projects in this location, that there could be cumulative adverse impacts in particular in relation to driver delay and fear and intimidation. In addition, there could be associated noise and air quality impacts in relation to these vehicle movements these would temporary adverse impacts. The Applicant refers to the inclusion of the requirement to set up Construction Forum and Traffic Working Groups in the Construction Traffic Management Plan (App Doc Ref 5.4.19.7) [**AS-109**] as the mechanism for coordinating measures for the management of construction impacts. The assessment of cumulative traffic impacts takes into account that there would be coordination with SLC Rail and WBDC so that each party can development mitigation measures in particular in relation to vehicle movement controls which would be incorporated in the relevant Construction Traffic Management Plan (CTMP) for each project. Requirement 9 of the draft DCO (App Doc Ref 2.1) [**AS-139**] requires approval of the detailed CEMP by the local authority and Requirement 8 of the draft DCO (App Doc Ref 2.1) [**AS-139**] secures compliance to the CoCP. *Biodiversity, landscape and visual amenity, and water* The ecology, landscape and visual, traffic and transport and water resources cumulative assessments concluded that, while there were no likely significant cumulative effects, there was a requirement for an interface plan between the Proposed Development and the Waterbeach Railway Station so that construction phase issues could be managed. This included ensuring there was co-ordination around habitat creation, protected species mitigation, minimising visual impacts of temporary works, developing aligned traffic control measures and ensuring temporary works did not increase flood risk. The assessment of cumulative impacts on these aspects takes into account that there would be coordination with SLC Rail and WBDC so that each party can development mitigation measures which would be incorporated in the relevant Construction Environment Management Plan (CEMP) for each project. The Applicant refers to section 3.4 of the CoCP Part B (App Doc Ref 5.4.2.2), which includes a specific requirement for the CEMP in relation to the Proposed Development to be prepared to include control

ExQ1	Question to	Question	Response
			measures in coordination with SLC Rail and WBDC. Requirement 9 of the dDCO requires approval of the detailed CEMP by the local authority and Requirement 8 secures compliance to the CoCP. The Applicant confirms that the issue of ongoing coordination specifically in relation to the interface on access and vehicle movements and the layout of the pumping station is covered within the SOCG with both SLC Rail and WBDC (App Doc Ref 7.14. 10 and App Doc Ref 7.14.19)**.** The Applicant has updated Section 3.4. of the CoCP Part B (App Doc Ref 5.4.2.2) which is being provided at Deadline 1 to clarify the requirements in relation to coordination with third parties where there is the potential for cumulative impacts.
1.23	Applicant	**Future baseline / cumulative assessment** ES Chapter 22, Table 2-6 [AS-044] identifies some projects as considered to be part of the future baseline rather than considered in the Cumulative Effects Assessment. No specific list of future baseline projects is identified in the ES and each aspect chapter makes aspect specific assumptions on the future baseline. Please provide a list to clarify which projects, or phases of projects, have been considered within the ES future baseline and which are considered in the ES cumulative effects assessment.	The Applicant will include in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1 the list of future baseline projects, as set out in response to Q1.20. The updated Table 2-6 (Long List of Developments) provided in response to Q1.13 above also identifies which are likely to be completed by construction and operation of the Proposed Development.
1.24	Applicant	**Decommissioning** The ES considers aspects of the decommissioning of the existing WWTP in some chapters. However, the ES does not appear to have assessed or made any assumptions regarding the future decommissioning of the proposed WWTP, despite some ES Chapters stating at the start that they present *the potential impacts of the Proposed Development on[…] during its construction, operational and decommissioning phases (for example ES Chapter 7: Air Quality [APP-039], amongst others). Notwithstanding para 1.7.4 of the Planning Statement [AS-166], please further justify the reason why the decommissioning of the proposed WWTP does not appear to have been assessed.*	Decommissioning considered within the assessment relates to those activities as they relate to the surrender of the existing permit. The Applicant refers to the table appended as **Appendix E** 'Q1.24 decommissioning assessment summary', which clarifies how decommissioning activities related to permit surrender at the existing Cambridge WWTP have been considered within each chapter. The Applicant has included relevant corrections relating to the appended table within the Environmental Statement Errata provided at Deadline 1. The Applicant refers to paragraph 5.4.27 of the Scoping Report (App Doc Ref 5.4.4.21) [**APP-080**] which sets out that '*the decommissioning of the proposed WWTP is not assessed in the EIA because there is currently no intention to decommission the proposed WWTP at any point in the future; it is more likely that further upgrades would be undertaken as required, to maintain treatment capacity in the catchment in perpetuity. Within this period, mechanical and electrical equipment would however require maintenance and as such, units such as electrical panels or pumps within buildings would have a shorter design life of between 10 and 20 years. Space for possible future expansion has been allowed for within the WWTP and STC operational areas'*. The Scoping Opinion (App Doc Ref 5.4.4.12) [**APP-079**] response from PINS on this matter stated that ''*….there is at least the potential for future decommissioning of the Proposed Development and that as such, this requires a description of likely decommissioning solutions to the extent that they can be foreseen (eg the extent of removal of above ground infrastructure and any landscaping etc).* In relation to this point, the Applicant refers to the ES Chapter 2: Project Description (App Doc Ref 5.2.2.) [**APP-034**] which included section 6.3 'Future decommissioning of the proposed WWTP'. This section explains that: • There are no plans to decommission any part of the proposed WWTP • The proposed WWTP Is designed to accommodate future flows until the end of the current local plan period (2041) • That to accommodate anticipated flows into the 2080s and 2090s this would be by expansion, modification, enhancement and optimisation of the WWTP infrastructure that is within the earth bank. • The only circumstances where the proposed WWTP might need to be decommissioned would be if the city of Cambridge was expanded into the Green Belt surrounding the proposed WWTP. This is considered to be a sufficiently unlikely scenario that it does not need to be addressed. In the unlikely event that this might occur, it would be subject to a separate planning process and assessment at the time.

ExQ1	Question to	Question	Response
			• Decommissioning would be likely to follow a reverse sequence of construction and commissioning, along broadly similar lines as set out in Chapter 2 for the proposed and existing Cambridge WWTP.
1.25	Applicant	**Employment at the proposed WWTP – operational phase** Table 2-6 of ES Chapter 11 Community [AS-028] notes that the Proposed Development would not result in a notable change in operational employment over and above the existing WWTP and in agreement with the Planning Inspectorate (the Inspectorate), the matter was scoped out. Para 2.2.6.2 of the Initial Equalities Impact Assessment (EqIA) scoping report [APP-210] states that the number of staff on the existing WWTP would remain as current (20, including eight office staff) during construction of the proposed WWTP. The number of existing office staff set out at 5.2.1 of the Operational Workers Travel Plan (OWTP) [APP-149] is 26 (including eight office staff). Para 2.2.8.1 of the EqIA scoping report [APP-210] states that at the proposed WWTP, eight office staff are expected to be on site each day. However, PDF Page 62/68 of the Consultation Appendix Phase 2 [APP-181] (which pre-dates [APP-210]) states that *As of October 2021, it is now confirmed that the total estimated number of combined small vehicle and van movements at the new facility (both ways) per day will instead total 92 movements. This is due to the recently confirmed inclusion of 30 office workers […] This will represent a like-for-like comparison with the existing traffic levels for office staff already associated with the current plant at Cowley Road […].* Table 5-1 of ES Chapter 2 [APP-034] suggests a total of 38 operational staff at the proposed WWTP and para 3.2.3 of the OWTP [APP-149] and Table 2-23 of ES Chapter 2 [APP-034] lists parking provision at the proposed WWTP for a total of 71 staff (plus 50 cycle spaces). Given the lack of clarity on staff numbers in the application documentation, and notwithstanding the Scoping Opinion of the Inspectorate, the ExA wishes to explore this matter further so that it can consider: any benefits from any increases in employment; traffic effects; functional relationship of staff to operations; and matters around associated development. a) Please explain where the 30 office staff at the proposed WWTP would be relocated from? b) Before the relocation of all those office workers was confirmed, where was it envisaged that they would be located? c) Would the 30 office staff at the proposed WWTP work for Recycling Environmental Services (RES)? d) If yes, and bearing in mind that the office staff work a single daytime shift, why are 51 parking spaces proposed for RES staff? e) If no, what role would the RES staff using those 51 spaces be performing on the site? Why are 51 RES staff not included in the breakdown of staff at the proposed WWTP? f) Why would RES staff have to be located on this site – are their roles physically connected to the operation of the WWTP such that it is essential for them to be on the proposed WWTP site or could they, for example, work remotely? g) Why, when the application documentation suggests that there would be 38 staff at the proposed WWTP and that staff would be encouraged to car share and use public transport (OWTP [APP-149]) are 71 car spaces and 50 bicycle spaces proposed? h) Please provide a schedule / table, supported by evidence to enable the corroboration of the information provided, setting out separately the number of staff at the existing WWTP and at the proposed WWTP, disaggregated as follows: • job title / area of expertise for the roles / nature of the work • the number of people in that role • a brief explanation of whether / how the role is connected to the operation of the WWTP such that it is essential for that member of staff to treat the WWTP as their main place of work i) Please set out whether any additional operational staff would be required as a consequence of the future expansion of the proposed WWTP.	The Applicant notes the discrepancy between the Environmental Statement Project Description (Table 5-1, APP-034) and other documents. The Applicant confirms that the correct operational employment numbers are those set out in Table 5-1. The nature of roles carried out by the office-based personnel is described in response to ExAQ 1.17 above. The traffic and transport assessment has been carried out on the consequent vehicle movements set out in Table 5-2 of APP-034 however it is noted that corrections to other documents will need to take place. a) The 30 office staff at the proposed WWTP would be relocated from the existing WWTP offices (see Q1.17 above) b) It has always been envisaged by the Applicant that its personnel currently working from the existing WWTP would relocate to the proposed WWTP however considerable uncertainty during the Covid-19 pandemic about working models meant that final consideration of this issue was delayed. c) RES (now WROL Water Recycling Operational Logistics) make up the majority of the 30 office spaces identified with the inclusion of a small number of Water Resources employees (up to 6). It should be noted that , on a daily basis, it would not always be the same individuals using those spaces. d) The 51 spaces are derived from the 92 vehicle movements identified in Table 5-2 of APP-034, which would require 46 parking spaces. In addition to the 38 roles identified in Table 5-1 there are an additional six spaces for the cars of tanker drivers (i.e. 12 movements, shown in Table 5-2 as "cars" and 2 operational visitor parking spaces (i.e. 4 movements, shown in Table 5-2 as "operational visitors". Five additional spaces have been provided for contingencies, including non-normal operation. The office parking requirement is aligned with South Cambridgeshire District Council's parking standards. To make sure people with different working hours have somewhere to park and we do not create a delinquent parking issue, the Applicant is proposing to provide adequate parking for all its employees working at or visiting the proposed WWTP. e) Please refer to the above explanation and 1.17 above f) Please see the above explanation and 1.17 above. g) The justification for the 51 spaces is set out above. The 71 parking spaces include an additional 20 visitor parking spaces for the by appointment Discovery Centre. h) The table at appendix F of the responses to ExA's first questions identifies all those roles the Applicant has registered as working from or at the Current Cambridge WWTP and plan to relocate. Note that the number of roles is greater than the number of office spaces because of part-time or flexi-working i) There is no planned increase of operational staff for the first expansion planned for around 2034 referenced in the Project Description (ES Chapter 2 (App Doc Ref 5.2.2) [APP-034].

2. Principle (including policy and legislative context, need and alternatives)

ExQ1	Question to	Question	Response
2.1	Applicant, IPs	**National policy** a) A revised NPPF was published on 5 September 2023. Please address any implications this may have for the application and assessments undertaken. 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. 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?	The revised NPPF includes policy changes associated with onshore wind development in England. As the proposed WWTP Relocation Project does not involve any onshore wind works, it is considered this iteration of the NPPF does not have any implications on the Proposed Development and assessments undertaken. The Planning Statement (as revised) (App Doc Ref 7.5) [**AS-166**] addresses the National Policy Statement for Water Resources Infrastructure (NPSWRI) in section 3.7. Note that this NPS was designated on 18 September 2023 but this is not reflected in the Planning Statement. Paragraph 1.5.1 of the NPSWRI states that it is *"a standalone National Policy Statement and should be treated as such. It is separate from the National Policy Statement for Waste Water and section 20 of the Planning Act, which sets out the definition of nationally significant waste water infrastructure."* The NPSWRI is therefore not considered to be relevant to waste water treatment, and consequently not relevant to the Proposed Development and its assessments. The Levelling Up and Regeneration Bill received Royal Assent on 26 October 2023 and is now an Act of Parliament (law). It should be noted that some of the measures within the Act will not come into effect immediately and require secondary legislation. A review of the Levelling Up and Regeneration Act (LURA) has been conducted; there is no specific reference to waste water or waste water treatment plants. The closest reference to waste water is in LURA Part 7 which relates to sites affected by nutrient pollution, whereby sewerage undertakers need to ensure that treated effluent from sewage disposal works meet nutrient pollution standards. The Proposed Development is not situated in an area affected by nutrient pollution. It is, however, designed to meet the predicted nutrient pollution standards when the proposed WWTP is commissioning and put into service and will satisfy the standards required by the EA in issuing a new permit for the WWTP. At the time of writing, it is considered that the LURA does not introduce additional considerations which affect the determination of this application.
2.2	Applicant, CCC, SCDC, CCoC, IPs	**National policy** NPSWW was designated in 2012. Taking account of any legislative and policy changes since that time: 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? 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. c) Given that the Proposed Development is not one of the schemes that is named in NPSWW, which factors noted in NPSWW relating to the demonstration of need for waste water infrastructure should be taken into account in the determination of this application? 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? 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. 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.	It is considered there are no significant changes to the circumstances on which the policies of the NPSWW were originally decided, and that policy provisions relating to 'factors for examination and determination of applications' and 'generic impacts' remain up-to-date. Although dated 2012, the NPSWW is extant policy and therefore must be treated as such. Since its adoption, modern carbon policy is now set out in the 6th Budget 2021 which updates the Climate Change Act 2008. The Environment Act 2021 also introduces new requirements, including in respect of biodiversity net gain, although these have yet to become mandatory. These changes are referenced in paragraphs 3.4.5 - 3.4.9 of the Planning Statement (App Doc Ref 7.5) [AS-166]. Page 8 of the NPSWW provides a summary of why waste water infrastructure is needed. It acknowledges that waste water treatment infrastructure is essential for public health and a clean environment, and that demand for new and improved waste water infrastructure is likely to increase in response to four main drivers: • More stringent statutory requirements to protect the environment and water quality; • Population growth and urbanisation; • Replacement or improvement of infrastructure; and • Adaptation to climate change. Although the Proposed Development is not directly named in the National Environment Programme (NEP) or NPSWW, the NPSWW does not say that need must exclusively be demonstrated by inclusion in the NEP. Paragraph 2.5.4 of the NPSWW anticipates further "unforeseen" projects coming forward, therefore a project could be considered as "needed" if it accords with the wider principles set out in the NPSWW. These should be taken into account when determining the application.

ExQ1	Question to	Question	Response
			Regarding the need for waste water infrastructure, the 2011 Water White Paper 'Water for Life' sets out the UK Government's long-term priorities for the water industry in England to ensure that plans are in place to increase the sustainability and to protect the resilience of the water sector, taking account of climate change, population growth, patterns of demand and the need for resilience in the face of hazards such as drought and floods. Water companies are obliged by law to produce a long-term strategy every five years to demonstrate the sufficient supply of water availability over the next 25 years. This is called the Water Resources Management Plan (WRMP). Anglian Water published their last WRMP in 2019 which covers the period from 2020-2045. Anglian Water is now developing its next Plan (WRMP24) for the period 2025 – 2050, a draft of which was submitted to DEFRA in October 2022. This Plan will (amongst other things) deliver a new strategic pipeline and reservoirs to manage and address current water resource issues. It is requested that the WRMP be considered when determining the application. Whilst the NPSWW does not explicitly state whether it allows for developments that are not waste water infrastructure, it confirms in its summary on page 8 that *"demand for new and improved waste water infrastructure is likely to increase in response to: population growth and urbanisation, and replacement or improvement of infrastructure"*. The relocation of the WWTP will allow the Applicant to continue to provide vital waste water services to customers across Cambridge and Greater Cambridge for many years in a more sustainable and resilient way.
2.3	Applicant, CCC, CCoC	**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. 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 favour of development does not apply and s105 does apply. 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.* a) In relation to this application, does NPSWW have effect? 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)? c) Must a need be demonstrated for projects which are not named in NPSWW or the NEP? d) Should this application be determined under s104 or s105 of PA2008? e) If this application was determined under s105 of PA2008, should NPSWW be considered as important and relevant? f) If you consider that NPSWW to be important and relevant to a s105 determination, should the weight to be given to any of the considerations in NPSWW differ materially from a situation where the application is considered under s104? If so, which considerations, how would the weight differ and why would the weight differ?	a) As noted at paragraph 3.1.8 of the Planning Statement (App Doc Ref 7.5) [AS-166] and supported by the Applicant's Legal Submission on the Applicability of S104 and S105 Planning Act 2008 (App Doc Ref 7.15) [AS-126], it is the Applicant's opinion that the NPSWW has effect in this instance because of the terms of the s35 Direction dated 18 January 2021 stating that the project is "*nationally significant*" (noting footnote 6 in NPSWW paragraph 1.2). In this case, the NPSWW is the primary basis for making the decision on the Proposed Development and the Secretary of State must, therefore, decide the Application in accordance with that NPSWW unless one of the conditions set out at subsections (4) to (8) s104 PA 2008 apply. Section 3.5 of the Planning Statement (App Doc Ref 7.5) [AS-166] confirms that there are no grounds for concluding that the conditions set out at subsections (4) to (8) s104 PA 2008 apply. b) NPSWW paragraph 3.1.2 sets out a general presumption in favour of applications for Waste Water NSIPs. It does not indicate a specific presumption in favour of this application. c) Whether a need must be demonstrated for projects which are not named in NPSWW or the NEP will depend on the particular circumstances of each project. In this instance, given the situation of the Proposed Development within the Cambridge Green Belt (and having regard to NPSWW paragraph 4.8.10) very special circumstances (which would include need) must be demonstrated. d) Please see the Applicant's Legal Submission on the Applicability of S104 and S105 Planning Act 2008 (App Doc Ref 7.15) [AS-126]. This breaks down the approach to s104 and s105. The Secretary of State must determine whether either S104 or S105 applies and then 'have regard' to the matters listed in the relevant section. It is the Applicant's submission that the NPSWW has effect and that none of the exceptions in Sections 104(4) to (8) apply and therefore that that the Secretary of State must (as per the wording in Section 104(3)) decide the Application in accordance with the NPSWW. e) It is the Applicant's position that the NPSWW is a matter which is both important and relevant to the Secretary of State's decision. The wording of the NPSWW refers not only to NSIPs (as specifically defined by s29 PA2008) but also to "*major waste water infrastructure defined in section 1.2*" (paragraph 1.1.1), "*new waste water infrastructure*" (paragraph 1.1.4), "*nationally significant waste water infrastructure*" (paragraphs 1.1.6 and 2.2.1), "*nationally significant infrastructure in the waste water sector*" (paragraph 1.2.1) and Section 3 NPSWW specifically "*sets out general policies in accordance with which applications relating to waste water infrastructure are to be decided that do not relate only to the need for new*

ExQ1	Question to	Question	Response
		Please justify your answers.	*infrastructure (covered in Part 2) or to a particular physical impacts of its construction or operation (covered in Part 4)*" (paragraph 3.1.1). Note that NPSWW Section 2 'Government policy on need for waste water infrastructure' does not confine itself to NSIPs and that NPSWW paragraph 3.1.2 refers to "*infrastructure of the types* [our emphasis] *covered by this NPS, set out in Part 2 of this NPS...*". f) Unlike s104 which requires that the application must be decided in accordance with the NPSWW, s105 requires only that the Secretary of State must "*have regard to"* (amongst other things) any of the other considerations in NPSWW. In principle, this allows the Secretary of State to apply greater weight to other matters (for example, in any LIR) which may stray outside any of the considerations in NPSWW. In this instance, the only such consideration is in respect of the consequential benefits that could be realised by the vacation of the existing WWTP site in NEC and its redevelopment to provide much needed homes, jobs and a wide range of community, cultural and open space facilities (including a community garden and food growing spaces, indoor and outdoor sports facilities) as envisaged in the Draft NECAAP and emerging GCLP (see ExQ2.15). The weight that should be given to those benefits is substantial, taking into account the support provided by the HIF award, the contractual arrangements in place to ensure delivery and the support provided in the draft NECAAP and emerging GCLP to the realisation of those benefits (despite those development plans not yet having progressed to adoption).
2.4	Applicant, CCC, SCDC	**National Policy** ES Chapter 16 Material Resources and Waste 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 management facilities (Department for Communities and Local Government, 2014).* 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.* a) Why did the local authorities not identify a suitable site for a replacement WWTP through their local plan process? b) Did the Applicant advocate that the local authorities identify a site? If yes, please provide evidence of this.	The local authorities did not identify a suitable site for a replacement WWTP because they considered that this would be a waste planning matter and therefore was not within the remit of the district planning authorities' joint local plan (the GCLP). The Applicant did not advocate that the local authorities should identify a site as it agreed with the above statement. In addition, the Cambridge City Local Plan and the South Cambridgeshire Local Plan were adopted in 2018 prior to the award of the HIF and the Applicant did not therefore have the necessary funding to effectively promote a suitable site capable of meeting the tests of soundness at NPPF paragraph 36. Similarly, the Cambridgeshire and Peterborough Minerals and Waste Local Plan was adopted in July 2021 and the Applicant was not in a position to advocate for a specific site at the relevant stages of Local Plan preparation prior to this date as it had not secured funding or completed its site selection. However, the Applicant did make representations to this document which resulted in Policy 11: Water Recycling Areas which supports the principle of relocation of Water Recycling Centres subject to certain criteria.
2.5	CCC, SCDC	**The development plan** a) Please provide full copies of any relevant adopted or emerging Development Plan policies (or other relevant documents e.g. North East Cambridge Area Action Plan) that you have referred to in any of your submissions. Should you refer to any additional Development Plan policies at any time in your future submissions (for example in a Local Impact Report) then, if they have not already been provided, please also submit copies of these into the Examination. b) Have there been any relevant updates to the statutory / emerging Development Plan(s) since the compilation of the application documents? Are the local planning authorities content with the Applicant's policy analysis?	
2.6	Applicant, CCC, SCDC, CCoC	**The development 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)?	Please refer to the Local Policies Accordance Tables (App Doc Ref 7.5.5) which list all the relevant adopted development plan policies and relevant emerging policies to the DCO and the degree of compliance of the Proposed Development with them. This is a new document which is being submitted at Deadline 1 specifically to address the question raised by the ExA.

ExQ1	Question to	Question	Response
2.7	Applicant, CCC, SCDC	**The development plan** Is it correct that neither the Cambridge Local Plan 2018 nor the South Cambridgeshire Local Plan 2018 require the relocation of the existing WWTP in their policies relating to NEC?	Neither Local Plan requires the relocation of the existing WWTP in their policies relating to NEC. Policy 15 of the adopted Cambridge Local Plan 2018 identifies the existing Cambridge WWTP site and surrounding area as an '*area of major change*' for redevelopment for high quality mixed-use development primarily for employment use as well as a range of supporting uses, commercial, retail, leisure and residential uses (subject to acceptable environmental conditions) with the details to be to be established through the preparation of an AAP. The policy recognises the continuing aspiration and opportunity which could be realised if the existing WWTP is relocated (see Cambridge City LP para 3.35). The emerging North East Cambridge Area Action Plan (NECAAP) is being prepared in accordance with the requirement set out in Policy 15 of the adopted Cambridge City Local Plan 2018 and has progressed to a stage where the City Council and District Council have approved a Proposed Submission Regulation 19 version of the NECAAP which makes provision (Policy 1) for NEC to accommodate 8,350 new homes (3,900 in the period to 2041) and 15,000 new jobs, predicated on the relocation of the existing WWTP. Public consultation on the Proposed Submission Regulation 19 version of the NECAAP must await the outcome of this DCO application. Nevertheless, given the detailed studies undertaken to date on the suitability and capacity of NEC to accommodate development, the draft NECAAP is an important and relevant matter in the determination of the DCO application to which substantial weight should be given.
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 85 of the Cambridge Local Plan 2018 states that: *Permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the requirements arising from the new development. Where existing infrastructure will be placed under strain due to the impact of new development, improvements to existing infrastructure or compensatory provision should be made so that an appropriate level of infrastructure is maintained.* The Applicant believes it would be possible to refuse planning permission on the basis that the existing WWTP is essential infrastructure. If an application was made for redevelopment of the WWTP, this policy would require compensatory provision to be made.
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 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*. a) Why did CCoC consider identifying land for a replacement WWTP at that time? b) Please provide: (i) a copy of the draft policy and supporting text for Site SSP15; (ii) details of the decision setting out the reasons why the proposed allocation was not taken forward; and (iii) any background information / evidence base relating to the selection of sites for a replacement WWTP.	CCoC considered identifying land for a replacement WWTP in December 2006 as the adopted Cambridge Local Plan 2006 identified, under Policy 9/6, the existing WWTP to be redeveloped for residential uses. This was contingent on the WWTP being relocated off site. This is set out at paragraph 9.30 of the Cambridge Local Plan 2006. A copy of the draft policy and supporting text for Site SSP15 (the existing Cambridge WWTP site) is attached at **Appendix G**. The CCoC Cabinet met on 15 April 2008 and considered the Cambridgeshire and Peterborough Minerals and Waste Plan Preferred Options 2 and the minutes for that meeting set out the reasons for not proceeding with the allocation: *Waste Water Treatment Works (WWTW) - Although the feasibility study was not formally available, it was reported that the housing led redevelopment concept was not viable in the foreseeable future and that as a result, the WWTW would be retained on the current site. Cabinet therefore supported the proposal that an alternative site for the WWTW, including Honey Hill, should not form part of the Preferred Options 2 consultation. Cabinet recognised that if the WWTW remained at the present site it would need to be extended and developed to meet the needs of the growing city, while at the same time reducing its impact on the local environment. Further to this, it was proposed that the existing WWTW should be subject to a Consultation Area some 400 metres wide around the site in order to allow the Council to review the environmental impact of the existing works on any new development proposals in the near vicinity.* The Applicant does not hold any information/evidence base relating to the selection of sites for a replacement WWTP from that time.

ExQ1	Question to	Question	Response
2.10	Applicant, CCC, SCDC	**Local planning policy - allocation of existing WWTP Site** Please provide: a) a concise chronology setting out the plan-making stages from the time when the existing WWTP site was first proposed for redevelopment; b) confirmation of who first proposed redevelopment of the site; c) any representations that were made by or on behalf of Anglian Water Services Limited or by any other party which highlighted the need to identify a site for a replacement WWTP if the existing WWTP was to be allocated for development; d) any responses to representations advocating the identification of a site for a replacement WWTP, or records of decisions by the Council in respect of the same (for example an explanation of why the Council did not think it necessary to allocate a site for a replacement WWTP); and e) any information that was submitted by Anglian Water Services Limited to inform the local plan / North East Cambridge Area Action Plan (NECAAP) process in respect of its locational requirements for a replacement WWTP.	a) The concise chronology is set out in the Greater Cambridge North East Cambridge Area Action Plan supporting evidence entitled: Chronology of the feasibility investigations of redevelopment of the Cambridge Waste Water Treatment Plant July 2021. It is also set out in the SCDC Local Impact Report in paragraphs 6.4 to 6.24. That is not repeated in detail here but the key elements are summarised below: The Cambridge Northern Fringe East area was first identified as a reserve of land for future growth and redevelopment in the Cambridgeshire Structure Plan 1989, for uses where an edge of Cambridge location was essential and not just desirable. It was excluded from the Cambridge Green Belt in the Cambridge Green Belt Local Plan 1992 prepared by Cambridgeshire County Council. Regional Planning Guidance Note 6: Regional Planning Guidance for East Anglia to 2016 was approved in 2000. It established a strategy for the Cambridge Sub-Region in Policy 22 that made a significant change from the previous development strategy where a substantial proportion of development had been dispersed to the villages and market towns around Cambridge, to a strategy that focused more development within and on the edge of Cambridge and in a new settlement close to Cambridge and well connected to it by high quality public transport. The Cambridgeshire and Peterborough Structure Plan 2003 gave effect to the development strategy for the Cambridge area that was set by RPG6 and it forms the basis for the strategy still being delivered today. The Cambridge Northern Fringe East site was included as part of the development strategy for the Cambridge Sub-Region (as the wider Cambridge area was called at that time, which included the area out to the ring of market town beyond South Cambridgeshire). The Cambridge Local Plan adopted in 2006 included an allocation for the Cambridge Northern Fringe (East) area. The independent Inspector's Report (at section 2.8 and paragraphs 5.3.10, 7.6.2 and 9.19.4) acknowledged that a policy in the plan allocating the Cambridge Northern Fringe site for redevelopment for principally residential uses could not fully go ahead unless the Waste Water Treatment Works was relocated, but found the proposed allocation sound, commenting that "the housing market in the City is buoyant, [and] residential land is valuable" and that "There are particular difficulties with the redevelopment of the Northern Fringe, but several years are available to Plan and prepare for this development". Viability work was carried out by the local authorities between 2006 and 2008 which ultimately concluded that the cost of relocation rendered redevelopment of the area as a whole unviable. They also suggested that that this position would remain unless an alternative source of funding for the reprovision of the Waste Water Treatment Plant could be secured. The East of England Plan 2008, updated RPG6 and carried forward the strategy contained in the Cambridgeshire and Peterborough Structure Plan 2003 largely unchanged and retained the development sequence that focused growth in the built-up area of Cambridge as the more sustainable location for development. Cambridge City and South Cambridgeshire District Councils both submitted their Local Plans for examination in March 2014, with draft policies for Cambridge Northern Fringe East saying that the amount of development, site capacity, viability, time scales and phasing of development for the site will be established through the preparation of an Area Action Plan (AAP). The examination into the two local plans took over four years before both were formally adopted in 2018. The HIF was then awarded in 2019.

ExQ1	Question to	Question	Response
			b) It is the Applicant's understanding that the Local Authorities first proposed the redevelopment of the site in the Cambridgeshire Structure Plan 1989. The above chronology and the Cambridgeshire Structure Plan show how long this site has been proposed to be redeveloped and with the HIF it can now be achieved. c) The Applicant has submitted representations to the emerging Greater Cambridge Local Plan Issues and Options 2020 stating that the Local Plan should clearly reflect the dependency on the need for the WWTP to be relocated. The Applicant further responded to the Greater Cambridge Local Plan First Proposals 2021 stating that it supported the Plan which stated at page 17 that the North East Cambridge allocation is dependent on the relocation of the CWWTP. d) This is a matter for the local authorities to respond to. e) No information has been submitted by the Applicant to inform the Local Plan or NECAAP in respect of its locational requirements for a replacement WWTP. As explained in our answer to Q2.4 above, the local authorities did not identify a suitable site for a replacement WWTP because they considered that this would be a waste planning matter and therefore was not within the remit of the district planning authorities' joint Local Plan. The process undertaken by the Applicant to identify a suitable site for the relocation is described in Chapter 3 of the ES Site Selection and Alternatives (App Doc Ref 5.2.3) [AS-18].
2.11	Applicant, CCC, SCDC	**Emerging local plan and NECAAP** Given the current early stage of the emerging local plan for the area and NECAAP: a) What weight can be afforded to it and its policies; and b) Would it be premature to recommend / grant development consent relating to a site which is not yet formally allocated in a local plan.	a) The proposed submission (Regulation 19) version of the NECAAP has been agreed by Cambridge City and South Cambridgeshire District Councils' decision-making processes "*for future public consultation, contingent upon the separate Development Control Order being undertaken by Anglian Water for the relocation of the Waste Water Treatment Plant being approved*". Whilst noting the advice at NPPF paragraph 48, in this instance substantial weight should be afforded to the NECAAP given the significant change in circumstances of the HIF award since the Local Plans for Cambridge City and South Cambridgeshire were adopted in 2018 and particularly to the extent of the development potential of the area identified in it. The NECAAP is being prepared in accordance with the requirement set out in Policy 15 of the adopted Cambridge City Local Plan 2018. It makes provision (Policy 1) for NEC to accommodate 8,350 new homes (3,900 in the period to 2041) and 15,000 new jobs, predicated on the relocation of the existing WWTP. The position set out in the NECAAP is based on detailed studies undertaken to date on the suitability and capacity of NEC to accommodate development and progression to adoption of the NECAAP has only been stalled by the local councils for the reason given by them in their RRs (RR-002 and RR-004). Weight should also be given to the Greater Cambridge LP - First Proposals (Regulation 18: Preferred Options), particularly to the supporting evidence that the NEC site is the most sustainable location for strategic scale development available within Greater Cambridge, and given the resolution by the Councils to approve the Development Strategy Update (Regulation 18 Preferred Options) report on 6 February 2023 which provides a clear position on NEC as one of three key strategic sites which will form "central building blocks of any future strategy for development" in the next GCLP Draft Plan (Regulation18) consultation. Substantial weight should be given to the conclusions of the Strategy Update. b) It would not be premature to recommend / grant development consent relating to a site which is not yet formally allocated in a Local Plan. NPPF paragraph 50 notes that refusal of permission on grounds of prematurity will seldom be justified. In this instance, the Proposed Development only provides for the decommissioning of the existing WWTP within NEC. That element of the Application does not conflict with either the adopted or emerging development plan. The Proposed Development of the new WWTP and connecting infrastructure does not require the prior allocation of a site for this purpose (and, for the reasons given by the local Councils, could not in any event be addressed in the emerging GCLP). The Minerals and Waste Local Plan, which is the appropriate development plan document for this development, includes a criteria-based policy (MWLP Policy 11: Water Recycling Areas) against which the Application can be judged. Likewise, the site of the Proposed Development

ExQ1	Question to	Question	Response
			does not need to first be removed from the Green Belt by an appropriate alteration to the Green Belt boundary. It can be implied from NPSWW paragraph 4.8.11 that some forms of nationally significant infrastructure can be accommodated in Green Belt without need for Green Belt boundary change. Indeed, the area contained within the Draft Order Limits will continue to perform an important Green Belt function even after the Proposed Development is complete. NPSWW and NPPF policy in relation to Green Belt allows inappropriate development where very special circumstances can be demonstrated (NPSWW paragraph 4.8.10 and NPPF paragraph 147). As set out at section 6.2 of the Planning Statement (App Doc Ref 7.5) [AS-166] the Applicant considers that the very special circumstances needed to justify the grant of development consent in this instance have been demonstrated.
2.12	CCC, SCDC	**Emerging local plan** Please provide an update on the progress made in respect of the emerging local plan and NECAAP, including in relation to water supply issues. Please explain the implications of water supply issues in respect of the type(s) of land use that are affected by this issue and whether the amount of development in the emerging local plan might be affected. What are the timescales for resolving this issue?	
2.13	SCDC	**Emerging local plan and draft NECAAP** 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 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.* a) Please provide a copy of the Committee Reports referred to in [APP-167] and a copy of the record(s) of any decision(s) relating to them (such as Committee minutes). b) Why would it be 'inappropriate' for the proposed WWTP to be within the scope of the emerging local plan or NECAAP if it is a policy of those documents which gives rise to the need for it to be relocated? c) Could an application for a replacement WWTP be determined under the TCPA regime? d) Can proposals which may be consented under the DCO process be reflected in a statutory development plan, for example by identifying or safeguarding land for them, even if an application would not be determined under the TCPA regime? e) Given that it was within the knowledge of the local authority that the redevelopment of the existing WWTP site would require the provision of a new WWTP, and given the prospect that the site for a new WWTP might be in the Green Belt, why did the emerging local plan not make provision for this, particularly given that Green Belt boundaries can only be altered through a review of a local plan? f) Have any studies been undertaken on or on behalf of the local authorities (but not including any studies by the Applicant) to identify a site for a replacement WWTP? If yes, please provide a copy. If not, please explain why not. g) If this application for a DCO is not consented, given that the development of at least part of the NECAAP area would depend on relocation of the WWTP, would you expect the draft NECAAP to be found sound and adopted? Would you progress the NECAAP in its current form? h) Given that the relocation of the WWTP is not a policy requirement of either the emerging Local Plan or the draft NECAAP, could it be concluded that housing that would be delivered on the site of the existing WWTP is not required to meet the housing requirement identified in the emerging Local Plan?	

ExQ1	Question to	Question	Response
		i) How much weight should the SoS give to a proposal that is not a requirement of an emerging non-statutory planning document such as an AAP? j) Does the draft NECAAP seek to pre-judge the outcome of this DCO Application? If not, what weight can be afforded at this time to those provisions of the draft NECAAP which depend on the approval of this DCO application? If this DCO application was not consented, could redevelopment of other parts of NEC be brought forward in the absence of an adopted NECAAP? If not, approximately how long would it take to prepare and adopt a revised NECAAP?	
2.14	CCC	**Emerging local plan and draft NECAAP** CCC's RR [RR-002] states that: *28. The City Council recognises that one of the issues the ExA may need to explore is that of reasonable alternatives to the relocation of the existing CWWTP and what the City Council's position is in light of the above and the clear contribution the DCO project makes towards achieving the objectives currently contained within the emerging joint GCLP.* and that *29. The evidence base supporting the emerging GCLP is clear. This concludes, of all the options considered, the NEC site (which includes the existing CWWTP site as noted above), is the most sustainable location for development in the area.* a) Please provide a copy of the evidence base / Sustainability Appraisal that concludes that, of all of the options considered, the NEC site is the most sustainable location; b) Did the assessment of sustainability take account of the release of Green Belt land to facilitate development of the NEC site when it assessed the relative sustainability of growth options? If not, clarify the reason for this; c) Has an option been considered where the existing WWTP remains *in situ* and other parts of NEC are redeveloped? Has this possibility been independently assessed by / on behalf of the Council and consulted on; d) Which alternatives to NEC were considered and discounted; e) RR [RR-200] mentions potential for housing development at Impington and Histon and at Cambridge City Airport instead of using the existing WWTP site – please clarify whether these sites have been considered for future housing development? Has an option of denser development at other proposed allocations / on a reduced-size NEC been explored as an alternative to the currently proposed extent of NEC?	
2.15	Applicant, CCC, SCDC	**Housing benefits – weight** How much weight should the ExA afford to housing delivery as a benefit having regard to: the unallocated status of the existing WWTP site; demolition / remediation associated with the existing WWTP site not secured through the dDCO; housing delivery not secured through the dDCO; no specific policies within the current development plans for CCC and SCDC relating to the relocation of the existing WWTP to the site proposed; and any draft policies in the emerging local plan and the NECAAP not having yet been tested or formally examined?	The weight that should be afforded to enabling housing delivery / urban regeneration as a benefit of the Proposed Development is substantial. Based on the details contained within the NECAAP, decommissioning and release of the existing WWTP site will enable regeneration and the creation of a new district delivering 8,350 homes (40% affordable), 15,000 new jobs and a wide range of community, cultural and open space facilities (including a community garden and food growing spaces, indoor and outdoor sports facilities) on a brownfield site within the urban area of Cambridge which is recognised as "*the most sustainable location for strategic scale development available within Greater Cambridge*" (as stated in the relevant representations of both South Cambridgeshire District Council and Cambridge City Council – RR-004 and RR-002). Delivery of this housing/urban regeneration on the vacated site (if the DCO is approved) is secured through the contractual arrangements around the HIF award (see response to ExQ 2.31 below). The Proposed Development, by freeing up a major brownfield site for regeneration, will therefore assist the Councils in delivering their spatial development strategy for homes and jobs sustainably as set out in the emerging GCLP by making possible the delivery a new low-carbon city district which will make a key contribution to the development of Cambridge, supporting growth in the economy and making an important contribution to meeting government housing objectives. The regional and national significance of this has been recognised in the SoS (DEFRA) s.35 direction (18 January 2021) and its importance elevated by the announcement by the Prime Minister and the Secretary of State for Levelling Up, Housing and Communities on 24 July 2023 to 'supercharge' Cambridge. This is a matter which the applicant believes is a 'both important and relevant' matter (in s104(2)(d) and s105(2)(c) PA2008 terms) which should be given substantial weight in the determination of the DCO application.

ExQ1	Question to	Question	Response
2.16	Applicant, CCC, SCDC	**Planning history** Is there any planning history of relevance to the determination of the DCO application?	There are numerous historic planning applications across the existing treatment works which are of no relevance to the determination of the DCO application. However, as referred to in ExQ2.22 permission was granted for construction of five buildings and kiosks on 19/8/2014 by Cambridgeshire County Council. This included the construction of a pumping station, four aeration lanes, and four final settlement tanks, five buildings to house electrical equipment and associated pipework and cabling. Permission was also granted for Installation of two containers to house plant and electrical control equipment under reference CCC/22/131/FUL on the existing site. Within parts of the Order Limits area, planning permission was granted for temporary borehole testing under permissions 21/05095/FUL, 21/05094/FUL and 21/03583/FUL. These were for intrusive investigative works to inform the DCO application. At the northern end of the Order Limits area planning permission has been granted for the Waterbeach Railway Station as referred to in the Notification of Change Request **[AS-006]**. The Change Application Covering Letter **[AS-137]** explains the reduction in overlap with the planning permission for the railway station. A prior approval for the Change of Use of Agricultural Buildings to 1 No. Dwellinghouse (Class C3), and for building operations reasonably necessary for the conversion at the barn on Low Fen Drove Way (22/00343/PRIOR) which has to be completed by 1 April 2025. This is addressed in the ES Volume 4 Chapter 18 Appendix 18.2 Odour Impact Assessment (App Doc Ref 5.4.18.2) **[AS-104].** Other Applications which are located close to the DCO and might impact on the DCO or be impacted by the DCO have been assessed in Chapter 22 (Cumulative Effects Assessment) of ES (App Doc Ref 5.2.22) **[AS-044]).**
2.17	Applicant	**Importance of the Proposed Development** Para 1.3.6 of the Guide to the Application [AS-138] states that *The importance of the Proposed Development, both regionally and nationally, was recognised by the Secretary of State for Environment, Food and Rural Affairs (DEFRA) in January 2021, who directed that the Proposed Development is nationally significant and is to be treated as a development for which a Development Consent Order (DCO) is required (see Appendix 1-3 of the Planning Statement, App Doc Ref 7.5).* Please set out the reasons why you consider the Proposed Development (i.e. the development described in the dDCO [AS-139], and excluding any other development that may be facilitated by the relocation of the existing WWTP) to be of regional and national importance.	The reasons for why the Applicant considers the Proposed Development (i.e. the development described in the dDCO (App Doc Ref 2.1) **[AS-139**]) by itself of regional and national importance are set out in the request for s35 direction attached at Appendix 1 of the Planning Statement (App Doc Ref 7.5 **[AS-166]**). The Secretary of State's reasons for making the s35 direction as set out in the annex to the direction are also attached at Appendix 1. The Applicant's s35 request refers, in particular, to: • The project is of a substantial scale and will deliver a modern, carbon-efficient waste water treatment plant that will continue to provide vital services for the community and the environment, recycling water and nutrients, producing green energy and enabling Cambridge to grow sustainably. • The project plays a vital role in the development of north-east Cambridge and in turn Cambridge's role in the Government's Industrial Strategy. • The project's national importance has already been recognised through the securing of £227m investment from Homes England via the Housing Infrastructure Fund (HIF) grant. This investment signifies its role in supporting the Government's target to build 300,000 new homes every year, while supporting jobs and local economies, and contributing to the Government's "Project Speed" initiative. • Cambridge is a regional, national and international centre of excellence for academic research, successfully commercialising that research in a range of fast-growing knowledge-intensive clusters, and industrial innovation. • The future economic growth of Cambridge is recognised as a priority in the Government's Industrial Strategy and in the announcement of Cambridge as one of eleven Tech Nation regional hubs being established outside London. The availability and affordability of housing has long been identified at local and national levels as a critical issue which must be addressed if the area is to realise its economic potential.
2.18	Applicant, IPs	**Need** Is the Applicant or any IP aware of any other DCO applications which relied on housing need to justify the Proposed Development in totality or in part?	No.
2.19	Applicant, CCC SCDC	**Need – NPPW**	In strict accordance with paragraph 7 of NPPW the Applicant considers that a need should be demonstrated for the proposed WWTP. This is consistent with the Applicant's response to ExQ 2.3 c). The Applicant has been clear

ExQ1	Question to	Question	Response
		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 which the capacity of the existing operational facilities would satisfy the need should be taken into account?	that there is no operational need for a new or relocated WWTP in Cambridge. There is an operational need for new waste water treatment capacity to serve Waterbeach new town, but this and all other existing development commitments in the combined Cambridge and Waterbeach waste water drainage catchment can be accommodated in biological capacity terms (but not yet in hydraulic/flow capacity terms) up to 270,000pe. There will be a need in due course for additional biological and hydraulic/flow capacity to meet non-committed development (ie other Development Plan allocations and any new allocations which are made in the emerging GCLP) up to 2041 which fall in the combined Cambridge and Waterbeach waste water drainage catchment (see Planning Statement paras 2.2.3-2.2.15, 2.4.3 - 2.4.6 and 2.4.24 (App Doc Ref 7.5) **[AS-166]**. This will have to be accommodated at the existing WWTP if not by the Proposed Development (275,000pe up to 2035 and 300,000pe up to 2041). There are no other existing operational facilities within this waste water drainage catchment area which could accommodate the required capacity of the Proposed Development. Consequently, the only existing facility which could accommodate the required capacity is the existing Cambridge WWTP. However, this would defeat the purpose of the application to relocate the WWTP. Need for WWTP relocation is best described as a need to deliver a vacated site in accordance with the terms of the HIF award and a strategic development need for the site to be redeveloped to deliver a new low-carbon city district making a key contribution to the development of Cambridge, supporting growth in the economy and making an important contribution to meeting government housing objectives (consistent with the objectives at sections 6 and 11 of the NPPF). The regional and national significance of this has been recognised in the SoS (DEFRA) s.35 direction (18 January 2021) and its importance elevated by the announcement by the Prime Minister and the Secretary of State for Levelling Up, Housing and Communities on 24 July 2023 to 'supercharge' Cambridge. Arguably there is a market need for the relocation in order to deliver a vacant site to enable regeneration for new homes and commercial space. This is demonstrated in the objectively assessed housing need for the Greater Cambridge Local Plan First Proposals 2021 and the Development Strategy update referred to in our answer to ExQ 2.34 below. There has been a market failure to deliver housing on this site which the HIF award seeks to unlock. Given the long history of attempts to seek regeneration of this site it is clear that there is a market need to deliver homes on the last major brownfield site in Cambridge. The NPSWW sets out at section 2 the 'general' need for waste water infrastructure and the main drivers for this need. This recognises the Government's key policy objective of sustainable development (mirrored at NPPF paragraphs 7 - 9 and elaborated in NPPF sections 6 and 11), population growth and urbanisation as one factor affecting need (paragraph 2.3.8), the potential need to centralise and transfer waste water treatment and discharge to suitable locations outside of urban centres (paragraph 2.4.14) and contribution to "... any long-term or wider benefits" (paragraph 3.1.3). Paragraph 2.5.4 anticipates further "unforeseen" projects, of which the need for those identified through the NEP should be considered to have been demonstrated. This does not preclude demonstration of need in other ways. The NPPW refers to quantitative or market need for new or enhanced waste management facilities (NPPW Paragraph 7). The purpose and objectives of achieving sustainable development set out at NPPF paras 7-9 remain relevant (see NPSWW para 2.2.3) - there is no conflict between the NPSWW and NPPF in this respect sufficient to trigger the advice at NPSWW para 1.1.6. (i.e. that the NPSWW should prevail). The extent to which the capacity of the existing operational facilities would satisfy the need (particularly over the longer term beyond 2035) in support of the spatial development strategy for Greater Cambridge is a relevant consideration and should be taken into account.
2.20	Environment Agency (EA)	**Need – NEP** Do you consider that the need for the Proposed Development has been demonstrated for environmental reasons and do you intend to incorporate it into any NEP? If not, why not?	
2.21	Applicant	**Need – existing WWTP** a) If the relocation of the existing WWTP was not consented, would there be sufficient capacity or could additional capacity be created at the existing WWTP and	There is inadequate capacity at Waterbeach to accommodate the additional flows from the Waterbeach New Town development. There is capacity at Cambridge WWTP at present, but if the existing facility continued to

ExQ1	Question to	Question	Response
		Waterbeach Recycling Centre to accommodate growth in the WWTP's catchment area during the forthcoming local plan period(s)? b) If additional capacity needs to be created, when would this be needed by and how would this be funded?	operate the capacity would be taken up by Waterbeach New Town growth and committed growth within the Cambridge catchment alone. Any applications which do not have planning permission (ie allocated but not committed) in the existing or emerging GCLP would require additional capacity within this waste water drainage catchment. Operationally, the existing WWTP is capable of being upgraded to provide additional waste water treatment capacity and not accommodate new technologies and increasing environmental standards. However, such expansion and new technologies would need to be incorporated into an existing and ongoing operational facility with mechanical and electrical equipment below peak efficiency and with less reliability and which has already been subject to a series of incremental improvements and upgrades. This means that new process elements will be subject to legacy placement (ie they will be more difficult to locate near to their counterparts and may instead have to be fitted into less suitable areas) where they would be less economical and not deliver the same process efficiency. Capital costs would be higher (in relative terms), operational efficiencies and improved workflow would be very difficult to achieve, maintenance time and costs will be increased, there would be increasing pressure on customers' bills and challenges to ensure the WWTP could keep within permit conditions for discharge or emission. The constraints imposed by the Safeguarding Area around the existing plant and the potential odour impacts on neighbours in its proximity would not be removed or be capable of being reduced to the extent capable of being achieved at the proposed WWTP. Absent the DCO, the Applicant would need to increase capacity to be able to accommodate 275000pe by 2035 and 300000pe by 2041. The existing WWTP will require continued incremental investment over the upcoming AMP periods to progressively increase its growth capacity and ability to meet tightening discharge permit obligations. The funding is identified at each AMP Price Review business plan submission where growth and regulatory changes are forecasted and budgeted for, so the Applicant's capital delivery partners can then construct and commission in the next AMP period. Maintenance and innovation investments are also planned within each AMP period. These generally improve plant performance and allow a facility's assets to be optimised. The specifics of these investments do not generally require Ofwat approval.
2.22	Applicant	**Existing WWTP – recent investment** a) Please provide details of any recent investment and upgrades to the existing WWTP, noting that a number of RRs (e.g. [RR-169]) make reference to this; b) Explain what brought about this investment; and Clarify what the lifespan of this investment was?	Planning permission was granted for construction of five buildings and kiosks on 19/8/2014 by Cambridgeshire County Council under reference S/0467/14/CW. This included the construction of a pumping station, four aeration lanes, and four final settlement tanks, five buildings to house electrical equipment and associated pipework and cabling. Permission was also granted for Installation of two containers to house plant and electrical control equipment under reference CCC/22/131/FUL. This planning permission facilitated the stream D activated sludge plant, associated sludge management and final settlement tanks that replaced streams A&B trickling filters, improving the WWTP performance, resilience and capacity. a) The Applicants recent investments on the existing WWTP outside of normal operation and maintenance were a capital investment for growth in 2014 of c£22M to improve performance and capacity of the WWTP as well as an OfWAT innovation fund investment to trial a hydrogen recovery process that is not part of the treatment process but will inform the Applicant on its ability to abstract hydrogen from the treatment process using a side stream MABR and hydrogen recovery equipment. b) Answered in a)
2.23	Applicant	**Benefits** Taking any perceived housing / redevelopment benefits out of the equation: a) What would be the main benefits that, in the Applicant's view, the Proposed Development would provide; b) Would these, in the Applicant's view, be sufficient on their own to demonstrate the very special circumstances needed to justify inappropriate development in the Green Belt and	The benefits arising from the Proposed Development are described at paragraphs 6.2.13 – 6.2.14 of the Planning Statement (App Doc Ref 7.5) **[AS-166].** These can be summarised as: ***Environmental benefits*** through the delivery of a new modern, low carbon waste water treatment facility: • significantly reducing carbon emissions (from being operationally net zero and energy neutral) • improving storm resilience (by making storm overflows and CSOs less likely to occur)

ExQ1	Question to	Question	Response
		to amount to public benefits to outweigh less than substantial harm to designated heritage assets (and to outweigh all other harms identified); and c) Could these benefits be achieved by further improvements to the existing WWTP.	• improving the quality of recycled water returned to the River Cam (by reducing concentration in final treated effluent discharges of phosphorus, ammonia, total suspended solids and BOD) • maximising public value and supporting the circular economy (by more efficiently and effectively recycling and re-using waste water in the interests of public health) • restoring and enhancing the surrounding environment (by increasing biodiversity by a minimum 20% complementing local initiatives such as the Cambridge Nature Network and Wicken Fen Vision) • substantially reducing the number of homes and properties within the area which may potentially experience odour (when compared to the equivalent area for the Proposed Development) The commitment to higher energy efficiency, on-site renewable energy provision, high standards of design and sustainable transport measures are clear environmental benefits, representing a move towards a low carbon economy and promoting more sustainable means of travel. These are key objectives of the NPSWW and the NPPF and are environmental benefits. ***Social benefits*** through: • improving access to the countryside (by the delivery of new paths and accessible open spaces) • enhancing education (through the facilities provided in the Discovery Centre and increased access to the WWTP) • enhancing recreational opportunities (formalising recreational access and providing wider connectivity through new and enhanced public rights of way) The provision towards new recreational space and enhanced public rights of way, while necessary to mitigate the impact of the development, would also be available to everyone in the local area. These are social benefits of the scheme. ***Economic benefits*** through: • investment in construction and related employment for its duration • increasing operational employment • supporting planned population growth and urbanisation in Waterbeach (in water treatment terms) • increasing operational resilience and flexibility to accommodate population growth projections plus an allowance for climate change into the 2080s in accordance with Anglian Water's statutory duties and with capability to efficiently and economically expand within the WWTP site to accommodate anticipated flows into the early 2100s in support of the spatial development strategy for homes and jobs set out in the emerging GCLP and the ambitions set out in the recent announcement by the Prime Minister and the Secretary of State for Levelling Up, Housing and Communities on 24 July 2023 to 'supercharge' Cambridge as Europe's science capital. The most significant benefit is that decommissioning and release of the existing WWTP site will enable regeneration and the creation of a new district delivering 8,350 homes (40% affordable), 15,000 new jobs and a wide range of community, cultural and open space facilities (including a community garden and food growing spaces, indoor and outdoor sports facilities). Enabling the realisation of these benefits is the key purpose of the Application. Ignoring this is, therefore, perverse since there is no other motivation for relocation. Absent the housing/redevelopment benefits, it is unlikely that the other benefits described would be sufficient on their own to 'clearly outweigh' GB harm and any other harm in this instance to constitute very special circumstances, though this is a matter of judgement for the decision maker. It is the Applicant's case that if the enabling benefits relating to housing delivery / urban regeneration arising from the delivery of the vacated existing WWTP are given their proper weight then there are other benefits which are additional to and contribute to and overall outweigh GB harm. Many of the operational benefits of the Proposed Development could be achieved to some extent by further improvements to the existing WWTP but this would depend on funding. Improvements to storm resilience (from

ExQ1	Question to	Question	Response
			use of the new tunnel for attenuation) would not be possible and achievement of the same level of operational and capital cost efficiencies and operational carbon neutrality would be more difficult and may be delayed by availability of funding. The benefits from the decommissioning and release of the existing WWTP site to enable regeneration would not be achieved, nor would the quantum of habitat creation, improved access to the countryside, provision of accessible open spaces, enhanced education and recreational opportunities.
2.24	Applicant	**Benefits** ES Chapter 2 Project Description section 6 [APP-034] sets out benefits of the Proposed Development relating to reduced carbon emissions, storm water management and water quality. a) Would any of these be required to meet future regulatory requirements; and b) Could any of these reported benefits be achieved without relocating the WWTP? If not, please explain why.	See answer to ExQ 2.23. The existing WWTP will require continued incremental investment over the upcoming AMP periods to progressively increase its growth capacity and ability to meet tightening discharge permit obligations. The funding is identified at each of our AMP Price Review business plan submissions where growth and regulatory changes are forecasted and budgeted for, so the Applicant's capital delivery partners can then construct and commission in the next AMP period. Maintenance and innovation investments are also planned within each AMP period. These generally improve plant performance and allow a facility's assets to be optimised. The specifics of these investments do not generally require Ofwat approval. They can have relatively quick paybacks to support business efficiency targets.
2.25	Applicant, CCC, CCoC, SCDC	**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 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?	Waterbeach New Town is an important strategic housing allocation in the South Cambridgeshire Local Plan (adopted 2018) Policy SS/6 which when built out will comprise some 11,000 new homes with associated infrastructure including new schools. Outline planning permission has been granted for the western part of the New Town for up to 6,500 dwellings in September 2019 (S/0559/17/OL) which is being delivered by Urban and Civic. They have received reserved matters approval (20/01649/REM) for part of the delivery of landscape, highways and earthworks and surface and foul drainage for Phase 1 (1600 homes) and the majority of this is now in place. Two developers now have reserved matters consented for 89 (21/02400/REM) and 111 dwellings (21/03866/REM) respectively and these are under construction. Their approved foul drainage strategy, which was agreed with Anglian Water, sets out that initial flows from their development (Phase 1) will be taken to the existing Cambridge WWTP via an existing Anglian Water pumping station located within the Cambridge Research Park. However, this pumping station has limited capacity and cannot accommodate flows from the entirety of the western part of the New Town. Full planning permission (S/0791/18/FL) for a relocated railway station and associated facilities and infrastructure was approved in January 2020. This has been commenced in order to ensure the permission does not lapse. Greater Cambridge Partnership are now taking forward the delivery of the station with anticipation of opening in late 2025. The eastern part of Waterbeach New Town received a resolution to grant planning approval in January 2021 for up to 4,500 dwellings (S/2075/18/OL). Anglian Water has been in discussion with the applicants, Waterbeach Development Company (WDC), with regard to a foul drainage strategy for their part of the New Town. It is proposed 0that initial flows from the development will be treated at Waterbeach Water Recycling Centre (WRC) which already treats waste water from Waterbeach village. The existing WRC however, has limited capacity and as with Anglian Water's existing pumping station in the Research Park, cannot accommodate the flows from all of Waterbeach east. In light of this, it is proposed to direct flows from Waterbeach New Town along with those from the existing Waterbeach village via a new pumping station to Cambridge WWTP for treatment. Essentially the new pumping

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			station and pipeline will be required whether or not the Development Consent Order for the new WWTP is granted. Anglian Water has been working closely with WDC with regard to the delivery of the new pumping station. A proposed location within the eastern New Town has been identified and Anglian Water have prepared a design for the pumping station. WDC has prepared a draft EIA Screening Opinion request and this is due to be submitted to South Cambridgeshire Council shortly. A formal planning application will follow thereafter. At this stage it is anticipated that this will be submitted in early 2024 with planning approval in place by autumn 2024. In light of the above, it is considered that significant weight can be attached to the benefits of providing a connection to the proposed WWTP at this time.
2.26	Applicant	**Site selection and alternatives** Please explain what informed the choice of criteria used in Stage 4 Final Site Selection of the alternatives assessment [APP-078]?	The criteria were selected through consideration of the NPS EIA criteria (sections 4.1 – 4.15 of the NPSWW) and stakeholder discussion, including with the relevant local planning authorities, taking into account the extent to which criteria were likely to be determining factors. The list of criteria encompasses the relevant issues which the project team, drawing on professional advice, considered to be material. The selection of the criteria is discussed further at Section 2 (page 11) of the Stage 4 Final Site Selection Report (App Doc Ref 5.4.3.5) **[APP-078]**.
2.27	Applicant, CCC, SCDC, CCoC, IPs	**Site selection** 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 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. a) When was the bid for HIF funding submitted? 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? c) If yes, please provide details of the sites that were considered and those which were discounted. Was the range of sites the same or more limited than in the July 2020 exercise? If it was more limited please explain why, and why the area of search was expanded for the July 2020 exercise that has been submitted as part of this DCO application. d) Was the scope of the site search exercise for the HIF bid agreed with any local authority? e) Which site or sites in [APP-075] could be delivered within the £227m funding envelope? Please provide evidence to support your response. 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? g) Was the £227m bid based on the highest-cost option? If not, which options were discounted for the purposes of the bid? h) Was Homes England made aware that the cost of tunnelling was a variable that could affect the affordability of a relocation scheme? 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?	The Applicant has the following answers to each part of the question. a) The HIF bid was submitted by The Cambridgeshire and Peterborough Combined Authority to Homes England on 3 Dec 2018. b) To support the HIF bid, the Applicant carried out a costing exercise which considered the generic costs of relocating to a, then unidentified, site within the relevant catchment. It would have been premature to carry out a site selection process as part of the HIF bid process. As described in the application documents, the site selection exercise was carried out later. c) As described above, only a costing exercise was carried out at this stage. d) As above, the work carried out to support the HIF bid did not include a site selection exercise. e) It is not known how many sites in the Stage 1 Initial Site Selection Report (App Doc Ref 5.4.3.2) [APP-075**]** could have been delivered within the funding envelope. As described in section 2 of that document, the Stage 1 Initial Site Selection process was based on physical constraints mapping including catchment locations and the 8 constraints listed in table 2.1. It would be costly, resource intensive and premature to develop cost models for the 47 areas of lower constraint identified in the report. f) See (e) above - cost comparison was not carried out at this stage. The HIF funding application was based on a robust estimate of generic costs of relocating to a, then unidentified, site. The Applicant does not believe it affects the robustness of any consultation. g) The parties to the HIF bid agreed the use of the higher number for bid was correct, to cover contingencies etc. h) Homes England assessed the HIF bid and would have been fully aware that the cost of tunnelling was a variable. The length of tunnel and final effluent pipeline were considered as key variables. i) Planning was identified as a risk in the HIF bid, with an explanation of practical and programme matters in the event of the development being brought forward through an application for planning permission compared with the development consent order. j) The site allocation process had not started and would not fit with HIF timescales. This was part of the project risk (see j) above and was accepted by Homes England, as evidenced in Mr Denton's statement during ISH2 (see ISH2

<table>
<tr><th>ExQ1</th><th>Question to</th><th>Question</th><th>Response</th></tr>
<tr><td></td><td></td><td>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?
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.</td><td>Transcript Document Reference EV-005d) and also as referenced in Homes England assessment of the bid (see Document Reference 8.10)

k) A redacted copy of the HIF bid can be found at Document Reference 8.7

All applications to the HIF programme were subject to a comprehensive assessment process undertaken by MHCLG (now DLUHC) and Homes England. A summary of the HIF assessment process and the assessment of the Cambridge HIF bid submission is in Document Reference 8.10.

The final conditions were included in the Grant Determination Agreement (GDA) provided in Document Reference 8.8.

Please note that the milestones in the GDA were revised by agreement as follows:

<table>
<tr><th>Enabling Stage Milestone</th><th>GDA Milestone Date</th><th>Latest approved date</th></tr>
<tr><td>Final site selection for new Waste Water Treatment Plant including tunnel corridors</td><td>31-Dec-2020</td><td>31-Dec-2020</td></tr>
<tr><td>Submission of a Development Consent Order to Planning Inspectorate</td><td>30-Jun-2022</td><td>28-Apr-2023</td></tr>
<tr><td>Grant of a Development Consent Order or planning permission satisfactory to Homes England</td><td>31-Dec-2023</td><td>30-Jun-2024</td></tr>
<tr><td>Enabling Stage Start Date</td><td>Date of the GDA</td><td>Date of the GDA</td></tr>
<tr><td>Enabling Stage Completion Date</td><td>31-Dec-2023</td><td>30-Jun-2024</td></tr>
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</td></tr>
<tr><td>2.28</td><td>Applicant</td><td>Site selection – alternatives
In ES Chapter 3 [AS-018] and in respect of the sites that were being studied for a potential relocation of the existing WWTP the following is noted:

2.3.20 Subsequently, in early 2020, a call for sites was issued by the Greater Cambridge Shared Planning Service (GCSPS) as part of the Greater Cambridge Local Plan process. In response to this call, and as part of the associated consultation process, the landowner at site area 2 submitted a proposal for over 185,000sqm of commercial floor space on the site, to form an expansion to the Cambridge Science Park.

2.3.21 The Science Park expansion proposals were not taken forward by GCSPS as part of the First Proposals for the Local Plan in Autumn 2021. Furthermore, although the OxCam Arc initiative received strong governmental support through the publication of a policy paper (DLUHC & MHCLG, 2021) in February 2021, that initiative has subsequently stalled and some elements of the government strategy, most notably the construction of the Oxford-Cambridge Expressway, having been cancelled.

2.3.22 However, although the promotion of the site was not successful in 2020/21, the Anglian Water CWWTPRP team, supported by appropriate local planning and property advice, consider that future urban growth and development pressures would be likely to affect the long-term resilience of this site for a WWTP due to the close proximity to the Cambridge urban fringe. The site represents</td><td>(a) The final site selection report is included at Environmental Statement - Volume 4 - Chapter 3 - Appendix 3.5 Stage 4 Site Selection Report (App Doc Ref 5.4.3.5) [APP-078]. The local planning and property advice was provided by Savills and this fed into the economic and planning sections at 4.4 and 4.5 of this report.

(b) Advice from the local authorities was not sought in relation to the longer term prospects for Site 2 as it was considered that they would be unable to provide any advice due to the risk of prejudicing the emerging Greater Cambridge Local Plan process. The promotion of Site 2 was, it should be noted, only one of a number of developments being considered/promoted in this area.

Paragraph 4.5.4 of the above document states:

Site area 2 is the subject of proposals for an extension to the Cambridge Science Park currently being promoted through the emerging Greater Cambridge Local Plan process. This proposal directly affects a significant portion of site area 2. At this time, this proposal has no planning weight. However, it is considered to be a credible promotion by a strategic landowner (Trinity College Cambridge) compatible with growth aspirations for Greater Cambridge for technology related development and the Government's growth prospectus for the OxCam Arc "key economic priority" area. Overlaying site area 2 with this promotion land and accounting for the asset encroachment/safeguarding area, development of a new WWTP here could therefore impede the future strategic</td></tr>
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		the highest construction cost option and a high risk remains that CWWTPRP viability could be undermined by significant increases in land value associated with possible future promotion of the land for commercial development. These risks are far lower at site areas 1 and 3. Therefore the original analysis made at the time of the Stage 4 site selection process remains accurate. a) Who provided the appropriate local planning and property advice? b) Was the advice of the local authorities sought in relation to the longer-term prospects for Site 2? If yes, please provide details of the advice given. c) Whilst this site was the highest construction cost option, could it have been funded within the HIF funding envelope? It is said that *viability could be undermined by significant increases in land value associated with possible future promotion of the land for commercial development.* d) Given that the emerging local plan has not yet been adopted, is it likely that another opportunity to promote this site would become available within the timescale for the implementation of a DCO for a replacement WWTP? If yes, please explain your answer. e) Was an offer made to the owner of Site 2 for their land and if so did they say that it was unacceptable to them? If yes, please provide evidence to support your response.	*growth of Cambridge by prejudicing or, at worse, obstructing alternative economic development proposals which are likely to be brought forward in the near to medium future.* Given the recent announcements by the Secretary of State regarding the Longer Term Plan for Housing and the commitment therein to see Cambridge supercharged as Europe's science capital, addressing constraints that have left the city with some of the most expensive property markets outside London, and companies fighting over extremely limited lab space and commercial property with prices that rival London, Paris and Amsterdam, it is considered that the above paragraph 4.5.4 still holds true, if not more so. (c) All sites taken forward from Stage 3: Fine Screening were considered to be fundable within the HIF funding envelope. Unaffordable options were excluded at this stage, as described at paragraph 3.2.2 of the Fine Screening Report (App Doc Ref 5.4.3.4) **[APP-077].** Site 2 was not ultimately selected for a variety of reasons, as detailed in the Stage 4 Site Selection Report (App Doc Ref 5.4.3.5) **[APP-078]**, including for cost reasons. The landowner of Site 2 will have further opportunities to promote Site 2 for commercial development at both Regulation 18 (full draft Greater Cambridge Local Plan) and Regulation 19 (Submission version Local Plan) consultation takes place. Regulation 18 consultation was due in Summer 2023 but has been delayed and an update to the GCLP programme is still awaited from the local authorities. Regulation 19 consultation (and subsequent examination of GCLP) will not occur until after this DCO application is decided. In respect of opportunities to promote Site 2 as a potential suitable location for the WWTP relocation, this is not an exercise the landowner has chosen to pursue to date. As explained in the answer to 2.4 it is considered that the Cambridgeshire and Peterborough Minerals and Waste Plan is the relevant development plan to seek an allocation for a new WWTP. This Plan was adopted in July 2021 and there is no current Local Development Scheme setting out when a review might occur. Therefore there is no opportunity to promote this site within the timescale for the implementation of the DCO for a replacement WWTP. Regarding (e) the parties agreed that their discussions were on a confidential basis.
2.29	Applicant, CCoC	**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 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.* 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 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.* a) Does the 400m buffer align with development plan policy? Please provide a copy of any relevant policy. b) If yes, if there any flexibility in development plan policy to allow a buffer that is less than 400m?	(a), Yes, the 400m buffer aligns with the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021 Policy 11 Water Recycling Areas (which is itself consistent with paragraph 8 NPPW). Policy 11 states: *POLICY 11: WATER RECYCLING AREAS (WRAS)* *Water Recycling Centres (WRCs) are essential infrastructure, and are identified on the Policies Map as Water Recycling Areas (WRAs). Proposals for new water recycling capacity or proposals required for operational efficiency, whether on WRAs or elsewhere (with such proposals including the improvement or extension to existing WRCs, relocation of WRCs, provision of supporting infrastructure (including renewable energy) or the co-location of WRCs 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. Proposals for such development must demonstrate that:* *(a) there is a suitable water course to accept discharged treated water and there would be no unacceptable increase in the risk of flooding to others;* *(b) if a new site, or an extension to an existing site, is less than 400 metres from existing buildings normally occupied by people, an odour assessment demonstrating that the proposal is acceptable will be required, together with appropriate mitigation measures;* *(c) if a new site, or an extension to an existing site, it has avoided land within flood zone 3 unless there is a clear and convincing justification not to do so, and the proposal is supported by thorough evidence of sustainability benefits, evaluation of site options and risk management through the application of the sequential and exception tests; and* *(d) adequate mitigation measures will address any unacceptable adverse environmental and amenity issues raised by the proposal, which may include the enclosure of odorous processes.*

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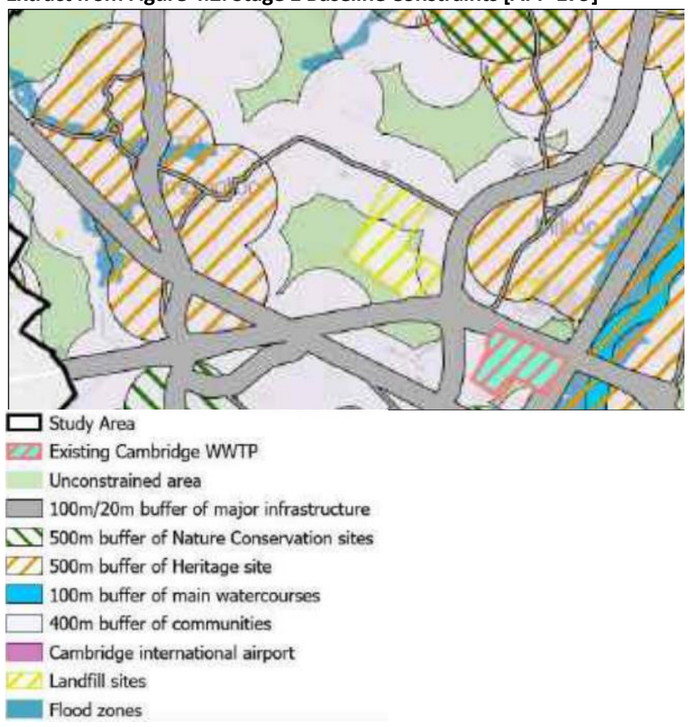
		c) The ES Chapter 11 Community [AS-028] states that communities with a minimum of 30-50 properties formed part of the community-level assessment. Was the approach of identifying sites with regard to individual dwellings sufficiently flexible? d) The area around Milton Road / Butt Lane (shown below) appears to have been discounted on the basis of the '400m buffer of communities' despite this area being very sparsely populated. Were any more detailed studies undertaken to ascertain whether, in areas such as this, the effects on residential properties could be mitigated such that there could be a larger 'unconstrained area' from which to identify a site for the replacement WWTP? **Extract from Figure 4.2: Stage 1 Baseline Constraints [APP-179]**  	(b) The presumption set out in the local plan policy above is that if a new site is less than 400m from buildings occupied by people then an odour assessment must be carried out to demonstrate the proposal is acceptable. So there is flexibility to allow for a buffer that is less than 400m. However, as explained in the Construction Appendix Site Selection Report (App Doc Ref 6.1.15) [APP-179], the Applicant considers, drawing on its considerable experience of managing odour issues at operational plants, that placing the new WWTP within 400m of any existing residential properties would result in increased risks to local community amenity and the operation of the plant. While existing waste water treatment plants operate in proximity to housing in many locations in the UK, odour impacts on residential amenity are not uncommon and the most effective solution to potential odour conflicts between a new plant and existing housing remains spatial separation. A similar principle applies to potential conflicts between existing plants and new housing, a principle which underpins the 400m consultation zone established in the local plan policy. (c) This question is inappropriately eliding two very distinct issues - a strategic site selection exercise and the assessment of community impacts. Given the provisions of the local plan described above, the Applicant considers that the application of the 400m criteria for site selection was robust and appropriate, particularly given its experience of managing operational plants. Consultation on the site selection methodology took place, including with the local planning authorities. In respect of the ES Chapter 11 Community (App Doc Ref 5.2.11) **[AS-028]**, and the focus of the assessment on groups of residential properties, it is common practice in EIA to distinguish community impacts from potential impacts on individual properties. The Applicant does not believe that it would be appropriate to apply strategic site selection criteria as the basis of project level environmental impact assessment. (d) More detailed studies were not considered to be appropriate at the preliminary stage of site selection, which encompassed the whole of the Cambridge and Waterbeach catchment areas (figure 3.1 of the Construction Appendix Site Selection Report (App Doc Ref 6.1) **[APP-179]**). As described above, the site selection process was based on the application of a robust 400m odour buffer which is supported in local planning policy. The selection of that buffer distance was informed by EIA professionals with odour expertise and through the Applicant's experience of managing operational assets. Other buffer distances were not considered. Odour issues were among the most significant community concerns during the Consultation 1 exercise carried out in respect of site selection, the strength of these concerns is reflected in the consideration of odour issues set out in the Stage 4 Site Selection Report (App Doc Ref 5.4.3.5) [**APP-078**] where a strong preference of the Applicant for optimising the separation of the proposed WWTP from housing is evidenced, for example see paragraphs 3.6.3 (page 28), 4.6.3 (page 44), 5.6.3 (page 61) and section 6.4 (page 75). At no stage in the consultation process did stakeholders express a preference for a process which adopted alternative, smaller, buffers around residential receptors.
2.30	Applicant, CCC, SCDC, Homes England	**Housing delivery – certainty of housing delivery on existing WWTP site** What evidence is there to demonstrate that the existing WWTP site is likely to be suitable for development – for example, if the land is shown to have been contaminated over the years by the existing WWTP, has there been a feasibility assessment and financial estimate for site remediation and an assessment made as to whether this would be prohibitively expensive for a developer?	There is a high degree of certainty that the existing WWTP site is suitable for housing development. As described above, its future use for housing is secured through the Homes England HIF agreement. The 'NECAAP - Chronology of the feasibility investigations of redevelopment of the Cambridge Waste Water Treatment Plant' Report (July 2021) lists studies dating back to 1989 into feasibility of the redevelopment of the existing site. Studies in support of the Reg.19 version of the NECAAP have specifically looked at the suitability of the vacated site for housing development and have not raised any issue which would suggest the site is not suitable. In terms of potential contamination, LandsecU+I / TOWN as master developers have commissioned a Preliminary Risk Assessment of the WWTP site which considers that it is unlikely that the site would be classified as Contaminated Land under Part 2A of the Environmental Protection Act (EPA) 1990. Contamination risk is therefore considered to be manageable, both technically and commercially.
2.31	Applicant, CCC, SCDC	**Emerging local plan and draft NECAAP**	

ExQ1	Question to	Question	Response
		In the RR of CCC [RR-002] it is stated that *30. However, the City Council recognises that it would have to review the situation in the event that the release of the CWWTP site does not occur for any reason, for example if the SofS decides to refuse to grant the DCO or if there are delays to the release of the existing CWWTP site or indeed if the applicant decides not to implement the DCO. and that 31. The City Council together with South Cambridgeshire District Council would have to try to identify and allocate other land within Greater Cambridge as part of the emerging GCLP to meet the area's strategic requirements for housing and employment*. a) Given the award of HIF funding to support housing delivery, are there any conditions attached to that funding or obligations which require the Applicant to implement the DCO? If there are obligations on the Applicant, please provide details of these and the timing of those obligations. b) In the development agreement or any other agreement, are there obligations on the Applicant to make the existing WWTP site available by a certain date? If yes, what is the date? Please provide a copy of this obligation or the reference to it if in a document that you have already provided. c) In the development agreement or any other agreement, are there obligations on the NEC master developer or any other party to commence or to complete the redevelopment of the existing WWTP site by a certain date? If yes, what is / are the date(s)? Please provide a copy of this / these obligation(s) or the reference to it / them if in a document that you have already provided. d) Please provide details of the number of homes that need to be delivered at NEC within the plan period of the emerging local plan. e) Please provide the housing trajectory for the emerging local plan period which disaggregates the number of homes at NEC per year and the number of those homes which would be on the existing WWTP site. f) If the DCO is not consented, how many homes could be brought forward at NEC? Please provide a marked-up copy of the draft policies map / site allocation to indicate which parts could still be brought forward.	a) The Applicant refers the ExA to the copy of the HIF Grant Funding Agreement ("GDA") (Document Reference 8.8), and we note as follows. i. The provision of funding in the GDA is subject to a number of conditions precedent. The conditions precedent that apply to the relevant funding depend on whether the funding relates to Enabling Stage Costs or Delivery Stage Costs. If they are Enabling Stage Costs the relevant conditions precedent are set out at clause 4.2.1 of the GDA; If they are Delivery Stage Costs they are set out at 4.3.1. At this time the Applicant foresees no issues with satisfying the relevant conditions as necessary at the appropriate time and will engage with Homes England as necessary to do so. ii. Once the conditions are satisfied and sums drawn down it must be used for defined "Project Expenditure" only. iii. There is no express obligation to implement the DCO in the GDA, but it is a Condition Precedent of the Delivery Stage Works that this be provided (if applicable). Whilst it was the expectation of the parties that the DCO would be necessary, the GDA does not pre-judge this. b) Dealing with the GDA: as noted in our response to ExQ 8.31, there are Milestones for securing vacant possession of the NEC/ Hartree site (referred to as "the Core Site" in the GDA) but these are indicative only at this stage/ The actual timings will be agreed with Homes England, based on realistic delivery timeframes, prior to commencement of the Delivery Stage. With regard to the Master Development Agreement ("MDA"), there is an indicative milestone date for the vacant possession of the Core Site of 28 February 2028. The indicative milestone will be reviewed and fixed before the Delivery Stage so there will then be a set date. The milestone however will not prevent part of the Core Site being made available before the milestone date. c) As noted above, there are milestones in the MDA, a redacted copy of which can be found (Document Reference 8.9) Milestone Dates for each plot are to be determined as part of during the conditional period of the MDA. In the GDA, the Milestone Dates are set out in Schedule 1. As noted above these milestones are currently indicative only and will be finalised with Homes England prior to commencement of the Delivery Stage. Currently it envisages commencement of the development on or before 31 March 2028 and completion on or before 31 December 2043. Please note these dates are for the delivery of the NEC/ Hartee site which includes other land as well as the WWTP site. d) 3900 homes to be provided between 2020-2041 (GCLP First Proposals Policy S/DS) e) This is taken from the Proposed Submission Version of the North East Cambridge AAP (page 271)

ExQ1	Question to	Question	Response

Figure 45 and 46 below provide a summary of the broad distribution and phasing of the housing provision anticipated in the plan.

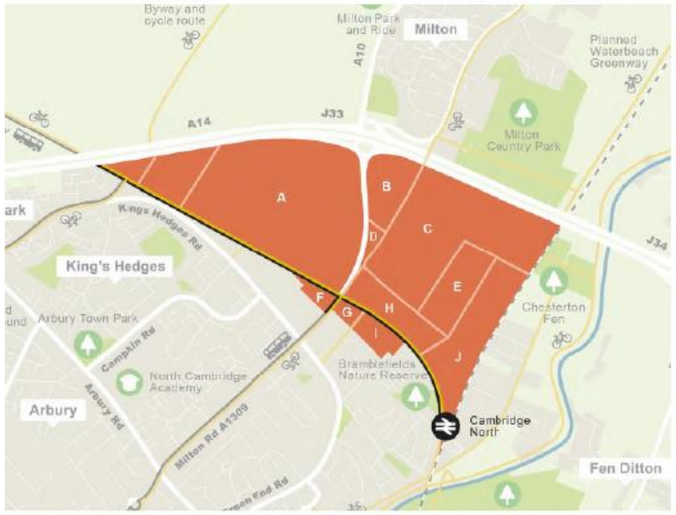
Residential - Net additional units	2020/25	2025/30	2030/35	2035/41	Plan Period	2041+	Total
Anglian Water / Core Site	-	-	400	1,500	1,900	3,600	5,500
Cambridge Business Park	-	-	100	200	300	200	500
Cambridge Science Park	-	-	-	-	-	-	0
Chesterton Sidings	-	650	600	-	1,250	0	1,250
St Johns Innovation Park	-	-	-	-	-	-	0
Trinity Hall Farm Industrial Estate	-	-	-	-	-	-	0
Nuffield Road Industrial Estate	-	-	50	100	150	300	450
Cowley Road Industrial Estate	-	-	-	100	100	350	450
Merlin Place	-	-	-	125	125	0	125
Milton Rd Car Garage	-	-	0	75	75	0	75
Cambridge Regional College	-	-	-	-	-	-	0
Total	0	650	1,150	2,100	3,900	4,450	8,350

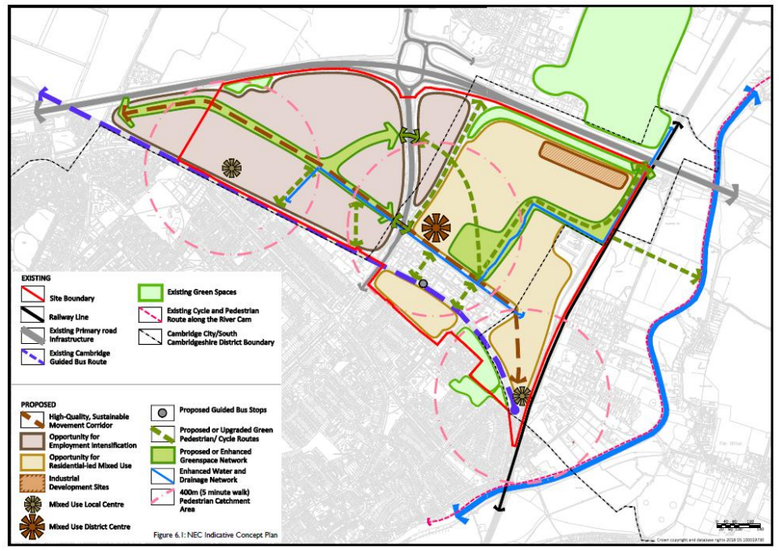
Fig 45: Table showing Net additional Residential units

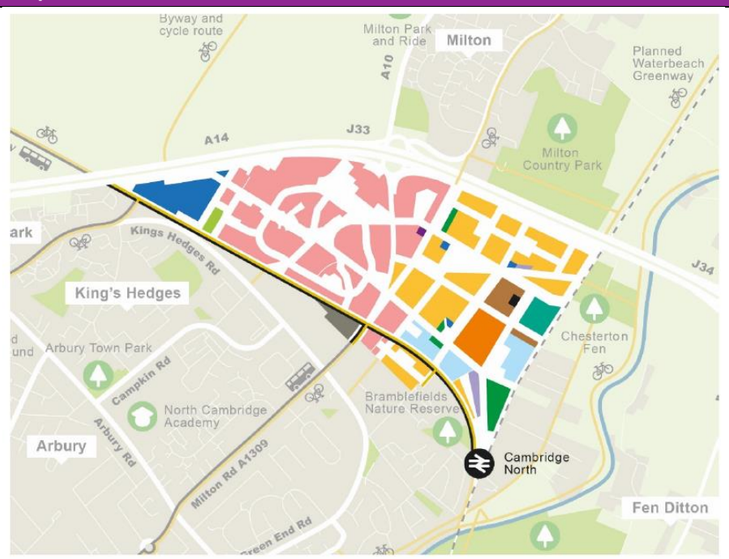
f) In the absence of the relocation of the WWTP, the existing Cambridge WWTP and the Safeguarding Area (or odour zone) around it will continue to prevent any residential development and restricts employment land-use to general industrial and office on the fringes. This prevents the consideration of housing development not only on the existing WWTP site but also on the surrounding 35 hectares of land, an area which forms the gateway between Cambridge north station and the Cambridge Science Park.

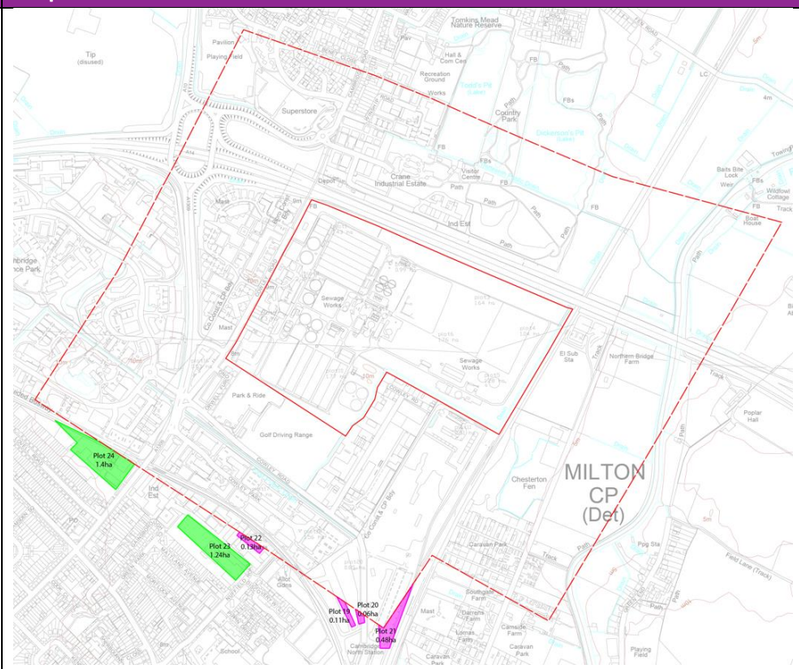
The NECAAP Sustainability Appraisal November 2021 acknowledges that “whilst it may be possible that some individual proposals may still come forward…. opportunities would continue to be very limited in the vicinity of the WWTP in order to be compatible with the existing constraints. There would be no comprehensive redevelopment of the site and very limited opportunities for residential development”.

The NECAAP Sustainability Appraisal ‘Area Action Plan and Reasonable Alternatives’ acknowledges (paragraph 4.26) that “if the WWTP were to remain in its current location, the full NEC development would not take place” and therefore that the full positive effects of the NEC including delivery of 8,350 houses, could not be delivered.

ExQ1	Question to	Question	Response
			Therefore, under the situation if the DCO is not consented, approximately 8,000 dwellings allocated to the NEC area will not be delivered and result in no homes can be brought forward. Please see the drafted map (Page 138, the Proposed Submission NECAAP November 2021), it shows sites allocated for housing.  KEY **A Cambridge Science Park** 60,000m² new business space, 1,150m² new logistics hub, 1,400m² new shops and community facilities **B St John's Innovation Park** 30,000m² new business space, 200m² new shops **C Anglian Water/ Cambridge City Council site** 5,500 new homes, 23,500m² new business space, 13,600m² new shops, local services, community, indoor sport and cultural facilities, 2 Primary schools and land safeguarded for 1 additional primary school if needed **D Merlin Place** 125 new homes **E Cambridge Commercial Park/ Cowley Road Industrial Estate** 450 new homes, 19,000m² re-provided industrial, storage and distribution space (B2 and B8), 5,000m² re-provided business floorspace **F Milton Road Garage site** 75 new homes, Partial retention of exisiting commercial floorspace **G Trinity Hall Farm Industrial Estate** 1,500m² new business space **H Cambridge Business Park** 500 new homes, 50,000m² new business space, 4,500m² new shops, community and cultural facilities **I Nuffield Road Industrial Estate** 450 new homes **J Chesterton Sidings** 1,250 new homes, 23,500m² new business space, 4,200m² re-provided industrial, storage and distribution space (B2 and B8), 1,400m² new shops and community facilities Figure 30: Map graphic showing broad locations and quantities of business space, homes and other land uses envisaged for North East Cambridge
2.32	Applicant, CCC, CCoC	**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 to waste water treatment plants would preclude it from allowing such a scenario to happen.* 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.*	a) The layout that was used for the purposes of the Statement of Requirement was the concept plan contained within the North East Cambridge Area Action Plan Issues and Options 2019 (below). ES Chapter 3 deals with alternatives considered by the Applicant in respect of the **relocation project** which is the subject of the DCO application; the concept plan in the local authority issues and options paper is therefore not relevant to that chapter. However, the Statement of Requirement helped to inform the 22ha land requirement adopted for site selection (see paragraph 2.2.5) although, as set out at paragraph 2.1.2 - 2.1.5, alternative technologies were considered, and dismissed.

ExQ1	Question to	Question	Response
		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 buildings which would be regularly occupied by people within a consultation area of 400m from the edge of the site of a Water Recycling Area* (para 1.2.4). *This policy would restrict development at NEC to employment land-use with largely general industrial and office uses on the fringes of the area. Housing development would not be possible on a core 35ha of land forming the gateway between Cambridge North station and the Cambridge Science Park* (para 1.2.5). *Consideration was additionally given to consolidating the existing treatment assets to occupy a smaller area of the existing site. However, this approach would not fully remove the presumption against development on large parts of the remainder of the site described above. Furthermore, the business case for the HIF funding award could only be sustained on the relocation of the whole WWTP, to enable regeneration of most of the site for housing. Funding was not available for a partial solution and without it, consolidation would be uneconomic. There was no partial solution which could sustain HIF support* (para 1.2.6). 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. b) What is the status of that layout – does it benefit from planning permission? 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. 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. e) Have measures to reduce the 400m buffer zone / safeguarding area been explored in this scenario? If so, please provide details and how many additional homes could be achieved. If not, please explain why not. 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? 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. 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.	NORTH EAST CAMBRIDGE INDICATIVE CONCEPT PLAN  Figure 6.1: NEC Indicative Concept Plan b) This layout does not have the benefit of planning permission. c) The Regulation 19 Proposed Submission North East Cambridge Area Action Plan 2021 includes Figure 11: Proposed land uses within the Area Action Plan boundary (see below).

ExQ1	Question to	Question	Response
			 Based on this latest figure, the Applicant estimates that approximately 8,000 of the 8,350 units identified in the NECAAP could not be provided if the WWTP remains in situ with the 400m buffer zone. The plan below indicates the existing WWTP site and 400m buffer area and shows the remaining sites identified for housing in the NECAAP which are situated outside the 400m buffer.

ExQ1	Question to	Question	Response
			 d) Consolidation on site was considered by the Applicant and Cambridge City Council as part of the scoping process for the bid to Homes England for support from the Housing Infrastructure Fund (HIF). The submitted HIF Expression of Interest made reference to options considered to address the problem of achieving large scale transformation in NEC to unlock land for a substantial number of new homes in an area of very high housing demand, adjacent to the rapidly growing Science, Innovation and Business Parks and Cambridge North station. In the context of downsizing/consolidation, the following is stated: *Various technical options for relocating the WRC* [WWTP] *to an alternative site were explored by consultants MWH to explore the impact of complete relocation on odour contours and developable area. Seven options were costed by Arcadis exploring different solutions for tunnelling, discharge point and extent of retention of the existing facility, with the preferred option chosen for its ability to minimise odour risk and enable and maximise residential development. The option of rationalising the WRC* [WWTP] *and retaining on site was also explored. This would still be expensive, while not allowing the release of any land for residential development on the core site. The potential of Council's owned land along Cowley Road (c.8 hectares), assuming the WRC* [WWTP] *remains on site in a do-nothing scenario, was also explored. The limited business, storage and industrial uses which could come forward would not generate sufficient value to fund the relocation of the WRC* [WWTP] *or achieve intended regeneration objectives.* The discussions with Homes England before the award of HIF funding included the identification of potentially surplus land released as a result of consolidating the treatment plant into the north east quadrant of the existing site. The conclusions drawn were that downsizing / consolidation: • would move the odour consultation zone to the north east, and so towards CB4; • would not allow residential development to be built on Anglian Water's land, or on much of the City land; and • would prevent the regeneration of the whole NEC and not deliver the wider vision of supporting the Science Park redevelopment, and possible extension.

ExQ1	Question to	Question	Response
			The amount of land released would not fund the consolidation, and funding would not be available from the Applicant or externally (from Homes England). Consolidation was therefore rejected as an option. e) 400m is considered by Anglian Water to be a safe distance from which odour will not be an issue for neighbouring properties. Properties outside this zone may still experience odour, but at a level not likely to give rise to statutory nuisance. Measures to reduce this zone have not been explored as the HIF funding is predicated on relocation of the WWTP and not consolidation on site. f) The draft NECAAP contains a masterplan for the area as explained above. The masterplan is predicated on the relocation of the WWTP and has reached Regulation 19 Proposed Submission Stage so there is no option to amend this with the WWTP retained on site. The proposed submission version is effectively a final draft which the Councils propose to adopt. Prior to formal public consultation on the Proposed Submission AAP, the Councils have paused the AAP process until a decision has been made on the Development Consent Order application for the relocation of the Cambridge Waste Water Treatment Plant. This is because the Area Action Plan is being prepared on the basis that the existing Waste Water Treatment Plan will be relocated off-site, which will enable this new city district to come forward, and the Development Consent Order is an important part of showing that the Area Action Plan can be delivered. g) The Deephams and Eastbourne works are adjacent to residential development and both have had an upgrade in recent years in part to reduce odour. These upgrades were partially to attempt to resolve existing issues with existing residential properties. This shows the difficulties that arise with housing being so close to a WWTP. It is the Applicant's understanding that before these upgrades odour was a significant problem due to the proximity of the WWTP to the housing. Both companies have also had to undertake a very lengthy and costly odour monitoring programme following the upgrade that puts undue operational risk on the operation of the WWTP. Notwithstanding the Applicant's position on relocation, a reduced/consolidated works would still have inherent odour risks if housing was built in close proximity to the works. Therefore, it would not be 'good planning' to introduce housing adjacent to even an upgraded WWTP. This is one of the reasons for the 400m consultation zone and the criteria set out in Policy 11 the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021. h) No bid/submission was made in relation to funding for a partial solution. At the ISH2 session Homes England confirmed this was not an option they would have considered.
2.33	Applicant, CCC, SCDC	**Housing delivery at NEC** ES Chapter 2 [APP-034] notes at para 6.1.1 that *Once construction and commissioning of the proposed WWTP has been largely completed, there will be no requirement for any of the above ground plant or equipment at the existing Cambridge WWTP to remain in operation, other than that related to the new transfer tunnel shafts that comprises a vent stack, odour control and dosing unit. Does the remaining plant affect the amount of housing envisaged in the emerging Local Plan and associated NECAAP?*	The remaining plant does not affect the amount of housing envisaged in the emerging Local Plan and associated NECAAP. The layout in the masterplan for the NECAAP has taken into account the need for retained plant on site. The plant is located outside of any development parcels and will not affect the delivery of the anticipated housing on the site.
2.34	Applicant	**Housing Delivery** ES Chapter 3 [AS-018] notes at para 1.2.3 that In respect of option (a) ("do nothing"), such an approach would result in the failure to fully deliver on required housing numbers in Greater Cambridgeshire and / or necessitate the delivery of housing at less sustainable locations. a) Please indicate, with reference to the emerging local plan housing trajectory, the extent of the failure to fully deliver on required housing numbers in Greater Cambridgeshire. b) Which less sustainable locations would need to be developed, and how many homes would need to be delivered at such locations during the emerging local plan period?	With the option of 'doing nothing', firstly, in accordance with Figure 45 of NECAAP (page 271, Proposed Submission NECAAP 2021), this will result in a direct loss of the housing allocated on the existing WWTP site which will be 1,900 houses during the Plan period (and a further 3600 houses thereafter). In addition, in accordance with Policy 16: Consultation Areas of the adopted Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021, there is a presumption against allowing housing development within the 400m buffer zone due to the odour safeguarding. According to the envisaged land uses for North East Cambridge, all other housing allocated at Merlin Place (125 homes), Cambridge Business Park (300 homes), Cowley Road Industrial Estate (100 homes) and Chesterton Sidings (1,250 homes) which are within the 400m buffer zone will also not be delivered. This will total 3,675 homes not being delivered in the Plan period.

ExQ1	Question to	Question	Response
			The Greater Cambridge Local Plan First Proposals sets out an objectively assessed housing need of 44,400. In accordance with Figure 7 (page 34) of the Greater Cambridge Local Plan First Proposals 2021, the joint councils have a pipeline of 37,200 homes committed, which leaves additional sites needed for 7,200 plus a 10% buffer of 4,440 which means 11,640 homes to be allocated. Of those 3,900 are due to be delivered at NECAAP. As explained in our answer to ExQ2.32, if the WWTP remains in situ then only approximately 350 homes could be delivered. This would result in 3,550 homes not being delivered in the Plan period of a total of 11,640 homes. In percentage terms this is 30%. The Greater Cambridge Development Strategy January update uplifted the housing need to 51,723. This demonstrates the importance of the housing development on this site being delivered. In the absence of the relocation of the WWTP, the existing Cambridge WWTP and the Safeguarding Area (or odour zone) around it will continue to prevent any residential development and restricts employment land-use to general industrial and office on the fringes. This prevents the consideration of housing development not only on the existing WWTP site but also on the surrounding 35 hectares of land, an area which forms the gateway between Cambridge north station and the Cambridge Science Park. The NECAAP Sustainability Appraisal November 2021 acknowledges that "whilst it may be possible that some individual proposals may still come forward…. opportunities would continue to be very limited in the vicinity of the WWTP in order to be compatible with the existing constraints. There would be no comprehensive redevelopment of the site and very limited opportunities for residential development". The NECAAP Sustainability Appraisal 'Area Action Plan and Reasonable Alternatives' acknowledges (paragraph 4.26) that "if the WWTP were to remain in its current location, the full NEC development would not take place" and therefore that the full positive effects of the NEC including delivery of approximately 8,000 houses would not be delivered. Therefore, with the option of 'doing nothing', the total housing – 3,900 dwellings allocated to the NEC area within the plan period will not be delivered and result in a total loss of approximately 8,350 dwellings allocated to the NEC area beyond the plan period. It is acknowledged above that there may be smaller opportunities that could come forward as shown in our answer to 2.32(c). South Cambridgeshire District Council's relevant representations (paragraph 25 – RR-004) recognise that "*should the relocation of the CWWTP not occur, both the District Council and Cambridge City Council would have to try and identify and allocate other land within Greater Cambridge to meet the area's strategic requirements for housing and employment*". Under present planning requirements, the Councils have to meet their Objectively Assessed Need (OAN) for housing within their combined boundary and both would have to try and identify and allocate other land within Greater Cambridge to meet the area's strategic requirements for housing and employment. Presuming that this exercise would need to align with the approach adopted to date for the development strategy in the emerging GCLP (ie to promote sustainability through provision of sustainable travel), the Councils acknowledge that "*this would likely include consideration of other less sustainable strategic locations, including the Edge of Cambridge in the Green Belt and New Settlements with high quality public transport connections to Cambridge*". As suggested above, 3,900 homes will need to be delivered at less sustainable locations within the local plan period.
2.35	Applicant, CCC, SCDC	**Proposed Development** Were the DCO to be consented, could there be a situation where: a) the Proposed Development is implemented and the existing WWTP site is not developed; b) the Proposed Development is only partially implemented, such as the Waterbeach pipeline element connecting to the existing WWTP which is due to be implemented first (according to Figure 1.1 of ES Chapter 2 [APP-034]) and is not reliant on HIF funding;	Please see Appendix D of the Applicant's Post Hearing Submissions in respect of ISH2 (App Doc Ref 8.6) which addresses these questions as raised in the hearing.

ExQ1	Question to	Question	Response
		c) If your answer to the above two questions is no, please provide reasons for this.	
2.36	Applicant	The Applicant confirmed its view at Issue Specific Hearing 2 that the Proposed Development is not a 'Nationally Significant Infrastructure Project' and does benefit from a presumption in favour of development under NPSWW. Does the Planning Statement [AS-166] require updating in light of this (e.g. given it refers numerous times to policy etc... relating to NSIPs).	The Planning Statement [(App Doc Ref 7.5) - AS-166] has been updated to remove any ambiguity that might imply that the Proposed Development is a 'Nationally Significant Infrastructure Project' and may benefit from a specific presumption in favour of development under NPSWW. The Proposed Development is development for which development consent is required, as confirmed by the s35 direction. Any retained references to NSIPs in the Planning Statement are only where specific wording in NPSWW is quoted. The revised Planning Statement is being provided to the Examining Authority at Deadline 1.

3. Agricultural land and soils

ExQ1	Question to	Question	Response
3.1	Applicant	**Code of Construction Practice (CoCP)** ES Chapter 6 Agricultural Land and Soils (App Doc Ref 5.2.6) [AS-024] para 4.2.96 refers to measures in section 7.6 of the CoCP Part A relating to severance to farm businesses and farm access maintenance, provision and reinstatement. Please highlight which specific para / bullet point in section 7.6 of the CoCP Section A addresses this, as it unclear to the ExA.	Section 7.6 (Traffic and Transport) of the CoCP Part A (App Doc Ref 5.4.2.1) has been updated to include at paragraph 7.6.10 that: "There will be a requirement to agree temporary access through coordination with landowners, tenants and/or land agents. One such example will be the creation of a temporary access from the B1047 Horningsea Road to land required for the construction of the transfer tunnel and avoidance of existing farm access to Poplar Hall. Affected farms are R037 and Y039." In addition to paragraph 7.4.30 referenced above under 'reinstatement', section 3.4 of the CoCP Part B (App Doc Ref 5.4.2.2) includes, in the 'Transport and Access' section of the table, a commitment that: "Final access arrangements for the following Farm holdings will be agreed with the landowner as per the Land Plans (App Doc Ref 4.4), parcel numbers: 012a-012m, 021a-021o, 036a-036d, 037a-037c, 039a-039c, 042a-042f, 044a-044d, 046a-046d and 055a." The updated CoCP Part A (App Doc Ref 5.4.2.1) and CoCP Part B (App Doc Ref 5.4.2.2) have been provided at Deadline 1.
3.2	Applicant	**Monitoring** ES Chapter 6 (App Doc Ref 5.2.6) [AS-024] para 4.2.107-109 (and 4.3.14-16) refer to measures in section 7.4 of the CoCP Part A relating to soil monitoring and to section 5.7 of the oSMP in relation to 1-5 years of soil monitoring. However, it is not clear to the ExA where such matters are specified in the stated sections of the respective documents. Please clarify or update the documents as necessary.	Paragraph 5.5.2 of ES Appendix 6.3 Outline Soil Management Plan (App Doc Ref 5.4.6.3) specifies that the minimum aftercare period is 1 year. ES Appendix 6.3 Outline Soil Management Plan (App Doc Ref 5.4.6.3) has been updated to include a soil monitoring period of 1-5 years and have been provided at Deadline 1. Paragraph 7.4.34 of the CoCP Part A (App Doc Ref 5.4.41) refers to the requirement to put in place measures to protect soil quality in accordance with ES Appendix 6.3 Outline Soil Management Plan (App Doc Ref 5.4.6.3), with bullet one referring to the monitoring period for soils as 1-5 years. The updated CoCP Part A (App Doc Ref 5.4.2.1) has been provided at Deadline 1.
3.3	Applicant	**Reinstatement** ES Chapter 6 (App Doc Ref 5.2.6) [AS-024] - please check that all references to para / sections in other documents are correct and if not, please correct these. For example, page 55 refers to *Return land temporarily required during construction to previous use through reinstatement and implementation of section 7.5 of the CoCP Part A and application of a SMP based on the outline SMP (App Doc Ref 5.4.6.3)*. However, section 7.5 of the CoCP Part A does not appear to relate to land restoration.	The Applicant acknowledges that the following sections of the ES Chapter 6: Agricultural Land and Soils (App Doc Ref 5.2.6) should instead state that: • Table 1-4. Sentence saying "the oSMP is based on Section 7.4 of the CoCP" should be updated to: "The oSMP is based on Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Site and on the Institute of Quarrying Guide to handling soils." • Table 5-1 and Table 5-2. Text in mitigation should be corrected to: "Return land temporarily required during construction to previous use through reinstatement and implementation of Section 7.4.30 (Soil Management) of CoCP Part A." • Table 5-1 and Table 5-2. Text in mitigation should be corrected to: 'Requirement within section 3 of the CoCP Part A (App Doc Ref 5.4.2.1) to appoint a Community Liaison Officer responsible for ensuring that

ExQ1	Question to	Question	Response
			relationships and lines of communication are maintained throughout the construction period including communication of temporary changes to access.' The Applicant has included the above corrections within the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1. The following sections of the CoCP Part A (App Doc Ref 5.4.2.1) have been updated to make reference to mitigation measures reference in relation to Agricultural land and soils: • Section 5.3 para 5.3.16 In locations where construction might result in disturbance to crops, livestock or horses, the working area will be delineated by post and rope fence except in fields where livestock is present, in which case livestock or horse fencing will be used. • Section 7.6 (Traffic and Transport) para 7.6.10 'There will be a requirement to agree temporary access through coordination with landowners, tenants and/or land agents. One such example will be the creation of a temporary access from the B1047 Horningsea Road to land required for the construction of the transfer tunnel and avoidance of existing farm access to Poplar Hall. Affected farms are R037 and Y039.' The updated CoCP Part A (App Doc Ref 5.4.2.1) has been provided at Deadline 1.
3.4	Applicant	**Assessment** ES Chapter 6 (App Doc Ref 5.2.6) [AS-024] indicates that the decommissioning of the existing WWTP has been considered as part of the assessment (e.g. para 1.1.1 and 2.8.6). However, this does not appear to be the case. Please clarify.	The decommissioning was considered during the assessment, with the conclusion that it would not have an impact on agricultural land and soils as it does not require land acquisition from agricultural land and the site is made-ground (Section 4.5 of the ES Chapter 6: Agricultural Land and Soils (App Doc Ref 5.2.6) [**AS-024**]).
3.5	Applicant	**Assessment** ES Chapter 6 para 3.1.9 (App Doc Ref 5.2.6) [AS-024] notes that a farm was not included in the assessment due to access issues and lack of farming activity on the land. Have any further investigations been carried out in this regard to inform an assessment, and if not, does the Applicant intend to undertake any during the course of the Examination? If not, how can the ExA be certain that there has not been a change in circumstances which might give rise to an adverse effect as a result of the Proposed Development?	The land that this sentence refers to is G042, southeast of Clayhithe Road, a 2.27ha parcel that will experience no permanent land acquisition and only 0.05ha temporary acquisition (Figures 6.11 - 6.14 in ES Book of Figures Agricultural Land and Soils (App Doc Ref 5.3.6) [**AS-049**]). It is confirmed amenity land and the landowner does not undertake any agricultural activity (Appendix B of Agricultural Impact Assessment (App Doc Ref 5.4.6.2) [**APP-082**]). The land parcel will be unaffected by works as they will involve installation using trenchless techniques in this location (see Design Plans – Waterbeach Pipeline Long Sections (App Doc Ref 4.14) [**AS-156**], with reference to 'Pipe Details' in the table shown below the 'Plan' of the pipeline long section on Drawings Nos. 4.14.2, 4.14.3, 4.14.4, 4.14.10, 4.14.11 and 4.14.12).
3.6	Applicant	**Soil management** Natural England's (NE) RR [RR-015] raises a number of concerns, including around: a) lack of information regarding soil re-use (including quantities and restoration profiles); b) the absence of a detailed Agricultural Land Classification survey where temporary disturbance would occur (i.e. along the route of the proposed Waterbeach pipeline); c) a lack of information in the Soil Management Plan relating to peaty soils, which require additional protection measures; d) and incorrect standards used in ES Chapter 6 (App Doc Ref 5.2.6) [AS-024] (i.e. the British Standard cited in bullet point 6 on page 10 and the use of HS2 for impacts on agricultural land) and in the Soil Management Plan (i.e. MAFF Good Practice Guide for Handling Soils (2000) rather than the Institute of Quarrying Good Practice Guide for Handling Soils in Mineral Workings (2021)). Please address these concerns.	The Applicant has addressed these concerns within an updated ES Appendix 6.3 Outline Soil Management Plan (App Doc Ref 5.4.6.3), which has been provided at Deadline 1. a) The Applicant does not yet know the quantities of soil that would be re-used as further detailed design would be required post DCO consent to confirm the excavation depths. The Applicant provided estimated maximum available soil volumes based on ALC surveys. The Applicant has now updated ES Appendix 6.3 Outline Soil Management Plan (App Doc Ref 5.4.6.3) [**AS-060**] to include a breakdown of soil volumes per soil type and per field. b) The approach to the ALC survey area is in alignment with the approved scoping approach defined within the Scoping Report (App Doc Ref 5.4.4.2) [**APP-080**] and Scoping Opinion (App Doc Ref 5.4.4.1) [**APP-079**]. For pipeline routes in areas of temporary land acquisition, the potential impacts are associated with the construction stage and are relatively short. The CoCP Part A (App Doc Ref 5.4.2.1) requires that the Contractor prepares detailed plans including a detailed soils management plan (SMP). The SMP includes mitigation that would ensure the appropriate restoration of soil without degradation to soil quality.

<table>
<tr><th>ExQ1</th><th>Question to</th><th>Question</th><th>Response</th></tr>
<tr><td></td><td></td><td></td><td>
c) ES Appendix 6.3 Outline Soil Management Plan (App Doc Ref 5.4.6.3) has been updated to incorporate peat guidance (paragraph 5.3.9 to 5.3.10; paragraph 5.3.16, bullet 13; paragraph 5.3.26, bullet 3; paragraphs 5.3.34 to 5.3.38) and replacing MAFF guidance with Institute of Quarrying guidance.

d) The British Standard was appropriately referred to as a means of classifying topsoil (e.g. low fertility, multipurpose etc.) after soil nutrient sampling. HS2 methodology was referred to as guidance, not a standard. IEMA guidance was used for the assessment of the loss of soil resources. However, IEMA guidance does not provide a methodology for an impact assessment on farm businesses (Tables 2, 3 and 4 of the IEMA guidance only provide criteria for soil resources, not farm businesses). There is no standard guidance for assessing the impact on farm businesses, hence the use of the HS2 methodology. It is a rational approved approach and its wider use would also have the benefit of providing parity in assessment between significant schemes.

For agricultural land assessment, the Applicant used an established methodology to determine significance of effect as required by the EIA regulations.

The Applicant has since conducted a sensitivity test to note the difference in results between the HS2 and IEMA methodologies (see table below). Both methods identified significant effects on agricultural land, although the degree of significance differs (moderate significance for HS2 vs major significance for IEMA). The ‘Temporary loss of agricultural land from waste water transfer tunnel, and treated effluent pipelines, the outfall and habitat creation’ was assessed as minor and not significant using HS2 methods, whereas IEMA methodology would identify a moderate, significant effect due to a different approach to assigning sensitivity (i.e. IEMA methodology would assign the land a higher sensitivity than HS2 methodology). The Applicant does not propose to update the ES because Natural England made the comment in the Relevant Responses that they ‘broadly agree with the significance of impact assigned to agricultural land and soils, despite inappropriate EIA methodology for agricultural land take’.

The difference in assessment between HS2 and IEMA for agricultural land is indicated below:
<table>
<tr><th>Area of scheme</th><th>Method</th><th>Sensitivity</th><th>Impact magnitude</th><th>Significance of effect</th></tr>
<tr><td rowspan="2">Temporary loss of agricultural land from waste water transfer tunnel, and treated effluent pipelines, the outfall and habitat creation</td><td>HS2 method used in the submitted ES</td><td>Low

(High prevalence of BMV land within a 2km radius of the Proposed Development)</td><td>Medium

(57% of land is Grade 2 (18ha) and, considered BMV land.)</td><td>Minor, not significant</td></tr>
<tr><td>IEMA method</td><td>Very high

(Presence of Grade 2 land)</td><td>Minor

(Temporary, reversible loss of one or more soil functions or soil volumes)</td><td>Moderate or large, significant effect</td></tr>
<tr><td>Permanent loss of BMV land due to land required for the proposed WWTP, access road and</td><td>HS2 method used in the submitted ES</td><td>Low

(High prevalence of BMV land within a 2km radius of the</td><td>High

(80% of the land constitutes BMV land)</td><td>Moderate, significant effect</td></tr>
</table>
</td></tr>
</table>

ExQ1	Question to	Question	Response
			landscaping proposals | | Proposed Development) | | | | | IEMA method | Very high (Presence of Grade 2 land) | Major (Permanent, irreversible loss of one or more soil functions or soil volumes over an area of more than 20ha) | Moderate or large, significant effect |
3.7	Applicant	**Construction** The Project Description [APP-034] refers to the use of horizontal directional drilling (HDD) (or pipe jack micro tunnelling) in some areas. Where are these areas shown and where would the use of HDD or pipe jack micro tunnelling be secured?	The areas where trenchless techniques (horizontal directional drilling (HDD) or microtunnelling) is to be used for construction of the Waterbeach pipeline are shown in the document Design Plans – Waterbeach Pipeline Long Sections (App Doc Ref 4.14) [**AS-156**]. Refer to the 'Pipe Details' in the table shown below the 'Plan' of the pipeline long section on Drawings Nos. 4.14.2, 4.14.3, 4.14.4, 4.14.10, 4.14.11 and 4.14.12. The standards and measures to be adopted by the Applicant and its Principal Contractors to manage the use of HDD (or pipe jack micro tunnelling) construction methods are set out in the Code of Construction Practice Part A (App Doc Ref 5.4.2.1). Further site specific measures relating to construction of the Waterbeach pipeline are set out in section 3.4 of the Code of Construction Practice Part B (App Doc Ref 5.4.2.2). The updated CoCP Part A (App Doc Ref 5.4.4.1) and CoCP Part B (App Doc Ref 5.4.4.2) have been provided at Deadline 1.
3.8	Applicant	**Assessment** Appendix B (Agricultural Impact Assessment Results) of ES Appendix 6.2: Agricultural Impact Assessment (App Doc Ref 5.4.6.2) [APP-082] has a number of entries such as 'TBC' (including for whether land take would be permanent) or 'Not so far as we are aware at this stage' for impacts on other revenue sources. a) Does the Applicant intend to update this table with the relevant information (i.e. the Applicant is likely to know whether permanent land take is required from cross referencing with the Land Plans (App Doc Ref 4.4) [AS-151]); and b) If so, might this affect the assessment undertaken?	The ES Appendix 6.2 Agricultural Impact Assessment (App Doc Ref 5.4.6.2) has been updated and is provided at Deadline 1. The document that was submitted erroneously contained an older version of the results table contained in Appendix B. The correct table has now been included in Appendix B, outlining the areas of permanent and temporary land take.
3.9	Applicant	**Farm holdings** ES Chapter 6 at para 2.3.4 (App Doc Ref 5.2.6) [AS-024] notes that farm holdings have been assigned an alphanumeric code to retain farm anonymity. However, given this, it is unclear to the ExA which plot numbers in the Book of Reference (App Doc Ref 3.3) [AS-145] relate to the farms assessed in ES Chapter 6 and whether any RRs have been provided from the relevant landowners / farm owners (or others with an interest). Please provide a solution to this matter.	The information in ES Appendix 6.2 Agricultural Impact Assessment (App Doc Ref 5.4.6.2) contains commercially and personally sensitive data. As the Environmental Statement is in the public domain, providing maps of land holdings labelled with the anonymised code, linked to information on the farm holding, would compromise the sensitive landowner information. In relation to Relevant Representations received from landowners / farm owners (or others with an interest) the Applicant refers to RR-192 (J Francis), RR-032 (PX Farms), RR-111 (E Francis), RR-128 (G Phillips), RR-239 (O Phillips) and RR-028 (Gonville and Caius). The Applicant has provided a confidential schedule to facilitate the review of the Book of Reference (App Doc Ref 3.3) [**AS-145**] and plot numbers in relation to the assessment of farms in ES Appendix 6.2 Agricultural Impact Assessment (App Doc Ref 5.4.6.2).

4. Air quality

ExQ1	Question to	Question	Response
4.1	Applicant	**Policy** Para 1.3.8 of ES Chapter 7: Air Quality [APP-039] refers to para 174 and 186 of the NPPF. Are any other paragraphs of the NPPF relevant to the consideration of the air quality effects of this application, e.g. para 105?	Apart from paragraph 174 and 186 of the NPPF, the Applicant considers that there are no other paragraphs of the NPPF directly relevant to the assessment of air quality for the Proposed Development. Paragraphs 104 and 105 of the NPPF relate to promoting sustainable transport. Paragraph 104 seeks to ensure that transport issues, such as the environmental impacts of traffic and transport infrastructure (which would include impacts on air quality) are considered at the earliest stages of development proposals. Paragraph 105 identifies the role of the planning system to actively manage patterns of growth by locating significant development in sustainable locations so as to (amongst other aims) reduce congestion and emissions, and improve air quality and public health. Whilst the purpose of this policy is perhaps more focused on development that leads to growth in transport requirements, such as housing, the Applicant accepts that it has some relevance to the Proposed Development. In this instance, the Proposed Development would result in the displacement of existing traffic associated with the existing WWTP. However, it does not generate, for example, the transport demand necessary to enable sustainable and alternative transport modes to help deliver congestion and emissions reductions, although it does aim to deliver the NPPF objective at paragraph 104 c) to promote walking, cycling and public transport use and, as described in paragraph 2.2.2 of ES Chapter 2: Project Description (App Doc Ref 5.2.2) [**APP-034**], vehicle parking at the proposed WWTP would include electrical vehicles charging points. The Applicant considers that paragraph 105 of the NPPF is of equal (if not more) relevance to the opportunity for the redevelopment of the existing Cambridge WWTP for housing and employment, which will be enabled by the Proposed Development.
4.2	Applicant	**Policy** Para 1.3.9 of ES Chapter 7 [APP-039] says that local planning policy of relevance to the Proposed Development *"includes"*...; - are there any other policies that should be considered which are not listed in this chapter of the ES?	Relevant local planning policy is listed at Appendix 5 of the Planning Statement (App Doc Ref 7.5) [**AS-166**]. An Adopted and Emerging Policy Accordance Table (App Doc Ref 7.5.5) has been prepared in response to ExQ1 2.6, which the Applicant is seeking to agree with the local planning authorities and other parties through SoCGs.
4.3	Applicant, CCC, SCDC	**Policy** Do you consider the air quality-related policies of the November 2021 'Proposed Submission North East Cambridge Area Action Plan Regulation 19' or of the Regulation 18 'Greater Cambridge Local Plan' to be Important and Relevant to the consideration of the DCO application?	The air quality-related policies of the November 2021 'Proposed Submission North East Cambridge Area Action Plan Regulation 19' apply strictly to development within NEC and therefore are not relevant to those parts of the Proposed Development outside this area. They instead apply to the decommissioning of the existing WWTP and the future redevelopment of that site that is enabled by the Proposed Development. The policies in the proposed NECAAP reference policies within the adopted Cambridge Local Plan such as 'Policy 36: Air quality, odour and dust', which is already considered in paragraph 1.3.9 of ES Chapter 7: Air Quality (App Doc Ref 5.2.7) [**APP-039**]. To the extent that these policies relate to the area of the Application within Cambridge City Council's authority and within the NECAAP area, the policies have, therefore, been taken into account and considered by the Applicant. It is for the Secretary of State, in accordance with s104 and s105 Planning Act 2008, ultimately to determine whether these policies are important and relevant. The 'Greater Cambridge Local Plan First Proposals' will apply to the whole of the Order Limits and includes 'Policy WS/HS: Pollution, health and safety'. The consultation undertaken as part of the Greater Cambridge Local Plan First Proposals raised a number of issues to be considered, such as sustainable heating and energy generation; reduction of car use through encouraging sustainable transport and locating homes close to existing development and employment areas; banning cars in Cambridge and congestion charging. The Applicant considers that the issues raised in the consultation process for the Greater Cambridge Local Plan are not relevant to the Proposed Development as they relate to the management of air quality through policy not relevant to a waste water treatment plant. Furthermore, the proposed policy direction for policy 'WS/HS: Pollution, health and safety' (page 201) of the Greater Cambridge Local Plan First Proposals highlights that applications for the development of hazardous installations / pipelines, such as the Proposed Development, will be referred to the Health and Safety Executive and/or the Environment Agency. An Industrial Emissions Directive (IED) permit to operate the Proposed Development is being sought from the Environment Agency. Nevertheless, a full air quality assessment has been undertaken demonstrating that there are no significant adverse air quality

ExQ1	Question to	Question	Response
			effects from the Proposed Development on air quality management areas, which is consistent with (amongst other policy) the policy requirements of the Greater Cambridge Local Plan First Proposals.
4.4	Applicant, CCoC	**Heavy duty vehicle (HDV) movements – clarification** Para 2.3.12 of ES Chapter 7 [APP-039] says that the largest increase in construction vehicles is 528 HDV on the A14 between J32 and J33. At A14 J33 the number of two-way movements reduces as 59 HDV exit the A14 and continue to the transfer access works via the A1309. The other HDV would continue on the A14 and exit at J34. **To the Applicant:** a) Do the 528 and 59 figures in para 2.3.12 relate to the number of vehicles or the number of two-way trips? b) If 469 HDVs (528 minus 59) continue to J34, please explain why para 2.3.14 says that traffic movements on A14 J34 entry and exit ramps would increase by 415 HDVs in total. **To CCoC:** c) Does CCoC agree with the traffic movement figures used in Chapter 7 and that the TA represents a sound basis for the assessment of air quality impacts?	a) The Applicant confirms that, as discussed in paragraph 2.3.7 of ES Chapter 7: Air Quality (App Doc Ref 5.2.7) [**APP-039**], all vehicle movements are presented as two-way trips, including the 528 and 59 referenced in this question. b) The number of vehicles using J34 to access the B1047, as well as J33 to access the A10 and A1309, are based upon construction traffic requirements to build out the Proposed Development. As presented in paragraph 2.9.4 of ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) [**AS-038**], all construction traffic movements on the A14 are calculated with the assumption that 90% of construction traffic is from the west and returns to the west and 10% of the construction traffic is from the east and returns to the east. The Applicant recognises a drafting error at paragraph 2.3.12 of ES Chapter 7: Air Quality (App Doc Ref 5.2.7) [**APP-039**] when citing 59 vehicles departing the A14 at J33, this should be 155. This does not influence the vehicle emission factors used in the dispersion modelling or the results and conclusions presented in of ES Chapter 7: Air Quality (App Doc Ref 5.2.7) [**APP-039**] as these are based on the correct data (including 155 departing the A14 at J33) as presented below, and so is purely a typographic error in ES Chapter 7: Air Quality (App Doc Ref 5.2.7) [**APP-039**]. This error has been acknowledged in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1. For clarity, the traffic generated for the construction phase for the following roads in question are calculated as follows (all as two way based on peak day of the peak construction year) • A14 west of J33 = 528 two way trips • A10 = 82 two way trips • A1309 = 90 two way trips • (82 + 90) x 0.9 = 155. This is the number of vehicles accessing/egressing at A14 J33 from the west. • 528-155 = 373. This is the number of vehicles on the A14 between J33 and J34 from the west. • East of J34 = (82+90+370+45) x 0.1 = 42 • J34 slip roads = 415 (370 for main site access north of J34, plus 45 for transfer tunnel access south of J34). • Between J33 and J34 = 474. This includes the double trip required between J33 and J34 to access J34 west facing slip roads when originating from the east. Notwithstanding the above, as discussed in paragraph 2.9.6 of ES Chapter 7: Air Quality (App Doc Ref 5.2.7) [**APP-039**], the air quality assessment is based on traffic numbers assuming a peak day in the peak construction year, which provides an extremely conservative worst-case scenario as the assessment is assuming the peak traffic numbers occurred every day of the year. If construction traffic was calculated as annual average daily traffic flows, as is typical for air quality assessments, the increase in traffic flows due to construction would likely have been below the assessment thresholds recommended by the Institute of Air Quality Management (IAQM) as presented in Table 2-16 of ES Chapter 7: Air Quality (App Doc Ref 5.2.7) [**APP-039**], which are used to determine if assessment is required. The benefit of the assessment approach used (i.e. adopting the peak day peak year construction traffic numbers) is that this is highly conservative and therefore the assessment in ES Chapter 7: Air Quality (App Doc Ref 5.2.7) [**APP-039**] provides a robust conclusion that the Proposed Development would not generate significant effects on air quality. Therefore, slight discrepancies such as those highlighted in this question, would not change the conservative nature of the assessment and would not change the overall conclusion of no significant effects.
4.5	CCoC	**Air quality comments**	

ExQ1	Question to	Question	Response
		CCoC made comments in respect of Air Quality at the Section 42 stage (see Applicant Regard to Section 42 Consultation Responses [APP-167]) but there are no air quality-related comments in its RR [RR-001]. Please confirm whether the Council will be making any representations in relation to air quality.	
4.6	CCC, SCDC	**Air Quality Statutory Limits** Do you consider that the Proposed Development would lead to non-compliance with any statutory limits whether during the construction, operational or decommissioning phases?	
4.7	Applicant	**Decommissioning of existing WWTP** ES Chapter 7 [APP-039] para 4.4.3 says that predicted impacts and effects on air quality associated with construction vehicle movements and construction plant during the decommissioning of the existing WWTP have been assessed. Has dust associated with decommissioning activities been assessed? If not, please provide an assessment, or justify why one is not necessary.	As discussed in paragraph 1.4.7 of ES Chapter 2: Project Description (App Doc Ref 5.2.2) [**APP-034**], consent is not sought under the DCO for the demolition or redevelopment of the existing Cambridge WWTP, which will be consented under a separate and future planning permission. The full demolition and redevelopment of the existing Cambridge WWTP would have the potential to raise dust and should be assessed under the future planning application. A dust risk assessment specific to the decommissioning activities associated with the existing Cambridge WWTP has not been undertaken in ES Chapter 7: Air Quality (App Doc Ref 5.2.7) [**APP-039**]. As presented in Section 6 of the ES Appendix 2.3: Outline Decommissioning Plan (App Doc Ref 5.4.2.3) [**AS-051**], decommissioning activities would not generate additional dust or emissions for the majority of activities. However, if 'punching' holes in tanks to avoid future build-up of rainwater was to lead to generation of dust, the activity would have a very short duration and would be at the lowest possible end of the potential dust emission magnitude for demolition within the Institute of Air Quality Management's 'Guidance on the assessment of dust from demolition and construction'. The risk of dust effects associated with the decommissioning of the existing Cambridge WWTP are therefore expected to be negligible and an assessment of dust risk associated with decommissioning activities at the existing Cambridge WWTP was not included in ES Chapter 7: Air Quality (App Doc Ref 5.2.7) [**APP-039**]. Assessment of the dust risk associated with construction activities at the existing Cambridge WWTP, Waterbeach Pipeline and the proposed WWTP are included in Section 4.2 of ES Chapter 7: Air Quality (App Doc Ref 5.2.7) [**APP-039**]. Whilst the dust risk is expected to be negligible during the decommissioning phase, paragraph 5.1.14 of Appendix 2.3 Outline Decommissioning Plan (App Doc Ref 5.4.2.3) [**AS-051**] notes that 'Decommissioning will be undertaken in accordance with the Code of Construction Practice Parts A and B (Appendix 2.1 & 2.2, App Doc Refs 5.4.2.1 and 5.4.2.2) to manage risks to the environment.' Section 7.8 of the CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**] sets out a framework for the control of air quality and includes 'standard' mitigation measures for dust control. Requirement 8 of the draft DCO (App Doc Ref 2.1) [**AS-139**] secures implementation of the CoCP. These are considered suitable to manage any dust emissions associated with the decommissioning phase and a specific decommissioning dust risk assessment would not result in further dust control measures being identified.
4.8	CCC, SCDC	**Policy compliance and mitigation** SCDC's RR [RR-004] says that, in general terms, it is satisfied with the scope, methodology and the initial conclusions derived from the Air Quality chapter of the ES. CCC's RR [RR-002] says that it is satisfied with the scope, methodology and results / conclusions of ES Chapter 7 when considering potential impacts within the City boundary. It also notes that CCC intends to comment upon the Decommissioning Management Plan (DMP) prior to works commencing. CCC recommends that airborne dust and emission control, management and monitoring during decommissioning should be captured by the DMP document to help minimise impacts of that phase of work. a) Does SCDC wish to make any further detailed comments? b) Please endeavour to agree DMP measures with the Applicant. c) Is the DMP referred to by CCC the same document that is referred to as the 'detailed decommissioning plan' which is provided for at R9(2)(b)(xiv) in the dDCO [AS-139]? d) Which local authority would be responsible for approving this? If it is not CCC, would CCC be given an opportunity to comment?	

ExQ1	Question to	Question	Response
		e) Are there any other air quality-related mitigation measures / requirements that CCC or SCDC thinks should be included?	
4.9	Natural England (NE)	**Mitigation and requirements** NE's RR [RR-015] says that it is satisfied with the Applicant's conclusions in respect of Air Quality on the basis that delivery of air quality control measures within the CoCP are secured through dDCO R8. For the avoidance of doubt, please specify the measures that NE wishes to be secured by R8.	
4.10	Applicant	**Draft Requirement 9** ES Chapter 7 [APP-039] refers to "Air Quality/Dust Management Plan(s)" e.g. at Table 5-2. R9(2)(a)(x) and R9(2)(b)(x) of the dDCO [AS-139] refers to "an air quality management plan". Should the dDCO be altered to reflect the terminology in the ES?	References to 'Air Quality/Dust Management Plan(s)' should instead be 'air quality management plan' to be consistent with the draft DCO (App Doc Ref 2.1) [AS-139]. This has been acknowledged in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1.

5. Biodiversity

ExQ1	Question to	Question	Response
5.1	Applicant	**Drafting Error** Appendices A-D listed under the contents pages of ES Chapter 8 Biodiversity [AS-026] and the Biodiversity Net Gain (BNG) Assessment Report [AS-161] are mislabelled and/or missing. Only one of the appendices has been provided (BNG detailed metric), which is titled as *Appendix D* within the BNG Assessment Report at the end of the document, but is labelled *Appendix C* under the contents page of both of the aforementioned documents. Please update the labelling and provide all of the appendices listed in the documents.	ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**] includes appendices A-J and the mislabeling has been corrected.
5.2	Applicant	**Drafting Error** ES Chapter 8 para 4.2.198 [AS-026] states that *The COCP Part A Section 4 and Section 6.2 (Appendix 2.1, App Doc Ref: 5.4.2.1) includes best practice measures to minimise impacts from lighting through design.* However, CoCP Part A [APP-068] does not reference lighting design at Section 4 or Section 6.2. Please update the document(s) accordingly.	The Applicant will update the reference in ES Chapter 8: Biodiversity (App Doc Ref 5.2.8) [**AS-026**] to reflect that the correct location of information is Section 5.9 within CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**]. Chapter 8 will be updated at Deadline 2 as it requires amendment however as the Applicant is currently in the process of engaging landowners on revised BNG figures the Applicant deems it more efficient to update the chapter as a whole at Deadline 2 along with the revision to the BNG figures.
5.3	Applicant	**Drafting Error** ES Chapter 8 Biodiversity [AS-026] (4.2.201) references section 4.16 of CoCP Part A [APP-068]. However, this section does not appear to exist. Please update the document(s) accordingly.	The Applicant will update the reference in the ES Chapter 8: Biodiversity (App Doc Ref 5.2.8) [**AS-026**] to: "Section 5.15 of the COCP Part A (App Doc Ref 5.4.2.1) **[APP-068]** specifies the requirement for continued engagement with airport operators and the requirement of a Wildlife Hazard Management Plan (App Doc Ref 5.4.8.18) **[APP-103]** in relation to Cambridge Airport." This update will be provided for Deadline 2.
5.4	Applicant	**Response to ExA's Procedural Decision [PD-004]** Regarding the ExA's Procedural Decision [PD-004], Biodiversity point 16.(f) has not been addressed in full – para 4.2.94 of ES Chapter 8 [AS-026] now refers to figure 6.3 which the ExA cannot locate within the Bat Technical Appendix [APP-092]. Please check and update accordingly.	The Applicant will update the reference in the ES Chapter 8: Biodiversity (App Doc Ref 5.2.8) [**AS-026**] to reflect that the correct figure number is 8.4.2, within ES Book of Figures Biodiversity (App Doc Ref 5.3.8) [**AS-050**]. the ES Chapter 8: Biodiversity (App Doc Ref 5.2.8) [**AS-026**] will be updated at Deadline 2 as it requires amendment, however, as the Applicant is currently in the process of engaging landowners on revised BNG figures the Applicant deems it more efficient to update the chapter as a whole at Deadline 2 along with the revision to the BNG figures.
5.5	Applicant	**Baseline survey conditions** Please confirm how the baseline for the condition of the Low Fen Drove Way Grasslands and Hedges County Wildlife Site (CWS) has been established in the absence of baseline habitat surveys?	It is incorrect that baseline habitat condition surveys were not carried out. The Applicant undertook baseline habitat surveys along Low Fen Drove Way Grassland and Hedges CWS in 2020 and completed National Vegetation Classification (NVC) surveys in July 2021. This survey effort is reported in Table 2-6 in the ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**]. These surveys provided information on the condition of the habitats present within the CWS. In addition, the NVC survey results are reported within the ES Appendix 8.10 NVC Baseline Technical Appendix (App Doc Ref 5.4.8.10) [**APP-095**].
5.6	Applicant	**Baseline survey conditions, impacts from lighting and enhancements to CWS** CCoC suggests that condition survey work has not been completed and that not all impacts have been identified on the Low Fen Drove Grasslands and Hedges CWS. CCoC also suggest that residual adverse effects from the proposed lighting scheme have not been addressed, and opportunities for enhancements to the CWS have been missed [RR-001]. Please provide a comprehensive response to address these points.	**Condition assessment** The Applicant has responded to this question in response 5.5 above. It is incorrect that baseline habitat condition surveys were not carried out. The Applicant undertook baseline habitat surveys along Low Fen Drove Way Grassland and Hedges CWS in 2020 and completed National Vegetation Classification (NVC) surveys in July 2021. This survey effort is reported in Table 2-6 in the ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**]. These surveys provided information on the condition of the habitats present within the CWS. In addition, the NVC

ExQ1	Question to	Question	Response
			survey results are reported within the ES Appendix 8.10 NVC Baseline Technical Appendix (App Doc Ref 5.4.8.10) [**APP-095**]. **Residual Lighting impacts** In relation to the lighting assessment, the approach to assessment and receptor selection has been discussed and agreed with Greater Cambridge Shared Planning during consultation, as outlined in Table 1-2 in ES Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [**AS-100**]. The assessment considers the measures indicated in ES Appendix 2.5 Lighting Design Strategy (App Doc Ref 5.4.2.5) [**APP-072**], which indicates that 'the installation shall be designed to avoid light pollution beyond the site boundary and upwards into the surrounding atmosphere, particularly in rural areas'. This assessment adopted a "worst case" approach (as provided in the ES Appendix 2.5 Lighting Design Strategy (App Doc Ref 5.4.2.5) [**APP-072**] and is presented in ES Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [**AS-100**]. The embedded, best practice and tertiary mitigation measures accounted for in the assessment are the provided within Table 4-4 in ES Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [**AS-100**], which are secured by the following Requirements in the draft DCO (App Doc Ref 2.1) [**AS-139**]: • Requirement 8: Each phase must be undertaken in accordance with the CoCP in so far as it relates to the works proposed in the relevant phase. This includes section 5.9 within the CoCP Part A (App Doc Ref 5.4.2.1) **[APP-068]** relating to lighting controls. • Requirement 9: No phase of the authorised development is to commence until a CEMP for that phase has been submitted to and approved by the relevant planning authority. • Requirement 14: Construction lighting, which requires that a detailed construction lighting design strategy for is submitted to and approved in writing by the relevant planning authority. This shall accord with the measures set out in the lighting design strategy. • Requirement 7: Detailed design, which requires detailed design information relating to the works proposed in that phase to be submitted to and approved in writing by the relevant planning authority. The details submitted in relation to operational lighting must accord with the details set out in the ES Appendix 2.5 Lighting Design Strategy (App Doc Ref 5.4.2.5) [**APP-072**]. In relation to the impacts of lighting, Low Fen Drove Way Grasslands and Hedges CWS is represented by receptors LR2 and LR3 in ES Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [**AS-100**]. Section 6.4, Table 6-1 and 6-2 of ES Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [**AS-100**] concludes that the residual effect to both LR2 and LR3 are none/negligible for both construction and operation respectively. The details submitted in relation to operational lighting must accord with the details set out in ES Appendix 2.5 Lighting Design Strategy (App Doc Ref 5.4.2.5) [**APP-072**]. On this basis, there are no adverse residual lighting effects that require further consideration. **Opportunities for enhancement** The Applicant disagrees that opportunities for enhancement of the CWS have been missed. The Order Limits have sought to minimise the extent overlapping with the CWS. Enhancement proposals for the CWS are provided in paragraphs 3.4.9, 3.4.10 and 3.4.11 of ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**] and are secured by Requirement 11 in the draft DCO (App Doc Ref 2.1) [**AS-139**]. These include the creation of new semi-improved neutral grassland to buffer the CWS, providing an opportunity to expand the CWS. This habitat creation and subsequent management ensures that there is no shading or encroachment of the existing CWS habitats. Furthermore, habitat management (scrub clearance to restore semi-improved neutral grassland and unimproved calcareous grassland) will help to improve the condition of the CWS.
5.7	Applicant	**Assessment** Please explain the approach to the biodiversity assessment (ES Chapter 8 [AS-026]) that indicates a 'slight beneficial effect' could be both significant or not significant? How has professional judgement has been used to make the distinction in the conclusions?	The Applicant has updated references within ES Chapter 8: Biodiversity (App Doc Ref 5.2.8) [**AS-026**] that stated, "a slight beneficial effect and significant" to "not significant". This is provided in ES Chapter 8: Biodiversity (App Doc Ref 5.2.8) [**AS-026].**

ExQ1	Question to	Question	Response
5.8	Applicant	**Response to RR from CCoC** CCoC (para 4.3) [RR-001] has identified a number of concerns regarding the mitigation of impacts of the Proposed Development on biodiversity, the Habitats Regulations Assessment and regarding the drafting of the DCO (para 4.4). CCoC also seeks clarification on the proposed Advisory Group (para 4.5). Please provide a detailed response to these queries and concerns.	The Applicant has reviewed the CCoC RR [RR-001]. The Applicant welcomes the comments made and further discussions are ongoing as part of the Statement of Common Ground process. The concerns raised within the RR are addressed in turn, and as presented in the CCoC RR. <u>HRA</u> The ES Appendix 8.15 HRA Screening Report (App Doc Ref 5.4.8.15) [**AS-068**] and ES Appendix 8.16 Habitats Regulations Assessment Report (App Doc Ref 5.4.8.16) [**AS-070**] considers European Sites and not SSSIs unless they are wholly or partially part of a European site (or that comprise functionally linked habitat or populations). The sites considered within the HRA have been discussed with Natural England who have indicated that they are content with the sites considered, captured within the working draft of the SOCG (App Doc Ref 7.14.8). ES Appendix 8.16 Habitats Regulations Assessment Report (App Doc Ref 5.4.8.16) [**AS-070**] will be updated to scope in the Eversden and Wimpole Woods Special Area of Conservation (SAC) through to Appropriate Assessment, as outlined in response 5.60, below. No additional Protected Sites are to be additionally considered. This update will be provided for Deadline 2. <u>Recreational usage of Stow-cum-Quy Fen SSSI</u> In relation to recreational usage of Stow-cum-Quy Fen SSSI, the Applicant has assessed the impact of recreational users and this is set out in paragraphs 4.3.12 to 4.3.18 of ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**]. The Applicant does not consider the proposed pathways and bridleway within ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**] will increase the effects on the Stow Cum Quy Fen area. ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**] proposes the inclusion of boundary treatment either side of paths within the landscape masterplan area with the intent that these would be an effective mitigation against footfall away from defined paths. This measure is used successful at many nature reserves and within the grounds of National Trust properties, such as Anglesey Abbey (which is a CWS) by using brash and woody material and/or mature and dense thorned planting to discourage both dogs and people from entry into sensitive habitats. This approach is in line with the intention of ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**] to formalise how people are already using the land required for the proposed WWTP rather than encouraging intensification of use. ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**] has not identified significant residual effects on this receptor, however, the following are proposed: • In relation to the bridleway, the Applicant will provide, as part of ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**] adequate signage to support appropriate use of the Bridleways to limit any impact. • Long-term application of ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**], which requires that the Applicant to prepare a detailed management and maintenance plan (secured through Requirements 11 in the draft DCO (App Doc Ref 2.1) [**AS-139**]), based on ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**], which will be agreed with key stakeholders. In relation to users, Section 4 of the Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**] includes the requirement to complete a user survey at least twice a year to understand how people are interacting with the recreational space and accessing the wider network of PRoW and permissive paths. The Applicant also refers to paragraph 4.1.2 and 4.1.4 of ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**], which confirms the commitment to set up an Advisory Group. Through this Advisory Group, matters such as recreational use can continue to be discussed and managed. The Applicant would continue to engage with relevant stakeholders including, but not limited to, councils (such as Cambridgeshire County Council, Cambridge City Council, South Cambridgeshire District Council and East Cambridgeshire District Council) and Natural England in relation to the development of the detailed Landscape, Ecological and Recreational Management Plan including the terms of reference for the Advisory Group. The terms of reference (ToR) would form part of the detailed Landscape, Ecological and Recreational Management Plan. The ToR would be agreed between the members and would include provisions on how many members are required for meetings or decisions quorate and have provision for dispute resolution in the event of non-agreement.

ExQ1	Question to	Question	Response
			The implementation of the measures within ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**] are secured by Schedule 2 of the draft DCO (App Doc Ref 2.1) [**AS-139**] relating to the detailed landscape scheme and detailed Landscape, Ecological and Recreational Management Plan, which will be approved by the relevant planning authority. Requirement 11 of the draft DCO fulfils this requirement and requires that the detailed plan accords with ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**]. Hydrological impacts to Stow-cum-Quy Fen SSSI ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**] considers the hydrological impacts including upon Stow-cum-Quy Fen SSSI. The Applicant organised a meeting with the Environment Agency and Natural England on the 22nd August 2023 to discuss proposals for groundwater protection and monitoring. It was agreed that the Applicant would provide an Outline Water Quality Monitoring Plan, which would be reviewed and agreed with the Environment Agency. A further meeting was held with the Environment Agency in October 2023 to agree this document and incorporate comments from the Environment Agency. A draft Outline Water Quality Management Plan (App Doc Ref 5.4.20.13) has been agreed in principle with the Environment Agency and will be submitted at Deadline 1. The final version of the plan, following approval from the Environment Agency, will be submitted at Deadline 2. Low Fen Drove Grasslands and Hedgerows CWS The Applicant has provided answers regarding Low Fen Drove Grasslands and Hedgerows CWS within responses 5.5 and 5.6 above. The Applicant confirms that there is continued engagement with Cambridgeshire County Councilin relation to Biodiversity matters and that the Applicant welcomes discussions in relation to impacts to the CWS and resolution of matters through the SoCG. River Cam The Applicant disagrees that there is inadequate assessment of impacts of discharging water into River Cam at the new outfall. ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**] includes the following appendices that include detailed modelling of the outfall: • ES Appendix 20.10 Storm Model Report (App Doc Ref 5.4.20.10) [**APP-160**] • ES Appendix 20.7 Outfall CFD Report (App Doc Ref 5.4.20.7) [**APP-157**] • ES Appendix 20.5 Fluvial Modelling Report (App Doc Ref 5.4.20.5) [**AS-113**] • ES Appendix 20.6 3D Velocity Mixing Report (App Doc Ref 5.4.20.6) [**AS-114**] • ES Volume 4 Chapter 20 Appendix 20.1 Flood Risk Assessment (App Doc Ref 5.4.20.1) [**APP-151**] The assessment within ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**] finds that the residual effect of stormwater discharges on River Cam water quality is moderate (beneficial) and significant, with regulatory stormwater discharge compliance monitoring proposed. This is assessed as such (refer to paragraphs 4.2.105 to 4.2.112 within ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**]) due to the River Cam having a high sensitivity and an anticipated reduced frequency of stormwater discharges occurring, meaning that the water quality will increase. The impact of the temperature of the final effluent discharge on dissolved oxygen concentrations in the River Cam is assessed as having a residual effect of slight adverse (not significant). The impact of treated effluent discharge from the proposed outfall on the River Cam hydromorphology is assessed as having a slight adverse (not significant) residual effect for normal operating conditions, and moderate adverse (significant) for abnormal flows (infrequent and extreme storm discharge). In relation to construction lighting, the Applicant can confirm that this matter has been subject to further discussions with the Council. ES Chapter 2: Project Description [**APP-034**] indicates that the works in the area of the outfall would be up to 12 months with the in river works limited to a period of up to 4 months during the summer months. Lighting in relation to the river works would be limited to essential navigation marks for river users. These measures will continue to allow nocturnal species such as bats and otter, to utilise the River Cam without light-mediated functional habitat fragmentation occurring. The assessment, along with the approach to assessment and receptor selection is presented in ES Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [**AS-100**]. The approach was discussed and agreed with

ExQ1	Question to	Question	Response
			Greater Cambridge Shared Planning during consultation, as outlined in Table 1-2 in ES Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [**AS-100**]. The mitigation measures considered in ES Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [**AS-100**] and how they are secured are explained in the response to the information provided for the Low Fen Drove Way Grasslands and Hedgerows CWS, above. In relation to the impacts of lighting, the River Cam CWS is represented by receptor LR13 in ES Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [**AS-100**]. Section 6.4, Table 6-1 and 6-2 of ES Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [**AS-100**] concludes that the residual effect to LR13 is "none/negligible" for both construction and operation respectively. This is based on the Institute of Lighting Professionals Professional Lighting Guide 04: Guidance on Undertaking Environmental Lighting Impact Assessments, PLG04 (2013). On this basis, there are no adverse residual lighting effects that require further consideration. <u>Allicky Farm Ponds CWS</u> The Applicant disagrees that there is inadequate mitigation / monitoring of adverse hydrological impacts. ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**] does not identify significant residual effects to this receptor as a result of construction, operation or maintenance of the Proposed Development. ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**] assesses the potential for ground water contamination and mobilisation of contaminants. This assesses the risk of accidental spills and leaks from the proposed WWTP migrating in groundwater through the west Melbury Marly Chalk Formation, or through sub-surface drainages at the proposed WWTP, to the surface drain connected to Black Ditch and to nature conservation sites, which include Allicky Farm Pond. The assessment is based on a contaminant transport model (ES Appendix 20.8 Update to Contaminant Transport Model (App Doc Ref 5.4.20.8) [**APP-158**]). The implementation of regular inspection and maintenance of below-ground tanks and drainage systems, and rigorous groundwater protection measures, would reduce the potential impact on groundwater quality in the aquifer in the West Melbury Marly Chalk Formation, and on surface water in the Black Ditch drainage network. ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**] also assesses the reduction in groundwater flows and levels at nature conservation sites due to dewatering in the West Melbury Marly Chalk Formation. A draft Outline Water Quality Management Plan has been agreed in principle with the Environment Agency and will be submitted at Deadline 1. The final version of the plan, following approval from the Environment Agency, will be submitted at Deadline 2. The final approach to monitoring will be agreed through Requirement 22 (the water quality monitoring plan) of the draft DCO (App Doc Ref 2.1) [**AS-139**], with this approach recorded within the SoCG with the EA. Requirement 9 in the draft DCO (App Doc Ref 2.1) [**AS-139**] requires the detailed Construction Environmental Management Plan to include a detailed Construction Water Quality Management Plan. The Construction Environmental Management Plan to be submitted to and approved by the relevant planning authority. Requirement 22 in the draft DCO (App Doc Ref 2.1) [**AS-139**] requires a detailed Operational Water Quality Monitoring Plan prior to the start of operation. <u>Water vole</u> Water vole mitigation and monitoring is outlined within the ES Appendix 8.22 Water Vole Natural England Ghost Licence Method Statement (App Doc Ref 5.4.8.22) [**APP-107**], which subject to minor amendments to be submitted post DCO consent, is acceptable to Natural England (Letter of No Impediment issued on 25 Jan 2023). Works Plan 39 as shown in Works Plans (App Doc Ref 4.3) [**AS-150**] includes specific habitat compensation in relation to water vole, which will be completed in accordance with the approach set out within the draft licence. Requirement 10 in the draft DCO (App Doc Ref 2.1) [**AS-139**] requires detailed plans to be prepared in relation to the outfall and Works Plan 32. This would include design information relating ditch habitat creation, monitoring and maintenance measures to be submitted to and approved in writing by the relevant planning authority. <u>Bats</u> The Applicant undertook surveys as outlined in Table 2-6 of ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**]. These were preliminary bat roost assessments, aerial tree assessments, and bat emergence and re-entry

ExQ1	Question to	Question	Response
			surveys within the Order Limits plus 100m buffer; bat activity transects within the proposed WWTP, the existing Cambridge WWTP and adjacent to the River Cam, including the treated effluent discharge outfall to the River Cam; and static surveys at four locations within the Order Limits. The results of the surveys are provided within ES Appendix 8.7 Bat Technical Appendix (App Doc Ref 5.4.8.7) [**APP-092**], and impacts are assessed within ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**]. The surveys were carried out in line with the Bat Survey Guidance (Collins 2016), and the approach for these was agreed with the Technical Working Group in 2019 (Table 8-72 in ES Appendix 4.2 Scoping Report (App Doc Ref, 5.4.4.2) [**APP-080**]), with limitations presented within ES Appendix 8.7 Bat Technical Appendix (App Doc Ref 5.4.8.7) [**APP-092**]. The limitations that occurred were taken into consideration when assessing impacts, and a precautionary approach was taken to consider the species assemblages using the Order Limits, as noted in paragraph 2.6.6, within ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**]. The surveys carried out allowed the Applicant to understand the species assemblages present, and to allow an assessment of any significant impacts of the Proposed Development upon them. <u>BNG</u> The Applicant disagrees that the application does not adequately demonstrate how it will deliver no net loss of biodiversity. ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**] details how the project will achieve 20% BNG. Section 6.1 of ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**] sets out how BNG would be secured. In summary this would be through the following: • Landscape masterplan (as required by DCO Requirement 11) • Provision of compensatory habitat as required as part of the water vole licence (as approved by the LPA in relation to DCO Requirement 10) • Application of the CoCP (DCO Requirement 8 and 9) • Likely conditions within licences which relate to habitat provisions for water vole Table 7-1 in Section 7 summarises the future monitoring mechanisms to implement, and monitor created and reinstated habitats. Appendix C (Outline River Units Net Gain Strategy) in ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**] provides the proposed approaches to achieving 20% BNG for river units. Requirement 11 of the draft DCO secures the requirement for a detailed LERMP to be submitted for approval. It must accord with the measures set out in ES Appendix 8.14 LERMP (App Doc Ref 5.4.8.14) [**AS-066**] and must detail how the measures contained within it contribute towards the achievement of 20% biodiversity net gain for the whole of the authorised development excluding any biodiversity net gain to be provided as river units under the operational outfall management and monitoring plan. No phase of the authorised development is to commence until a detailed LERMP has been submitted to and approved by the relevant planning authority. The Applicant disagrees with the statement that the Proposed Development is unlikely to deliver 20% BNG for river units. The Applicant is committed to achieving 20% gain in river units, a strategy for this is provided in Appendix C: Outline River Units Net Gain Strategy of ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**]. Appendix C states what is required to achieve a 20% BNG on river units. The Applicant will be updating this document to include updated figures. This update will be provided for Deadline 2. The Applicant is currently in the process of engaging land owners on revised BNG figures. <u>Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [**APP-068**]</u> The ES Appendix 2.1 Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [**APP-068**] and ES Volume Appendix 2.2 Code of Construction Practice Part B (App Doc Ref 5.4.2.2) [**AS-161**] includes provisions in relation to the following ecological receptors: • Bats – CoCP Part A (paragraphs 5.9.5, 7.2.3, 7.2.9, 7.2.22-7.2.27) and CoCP Part B (paragraphs 3.3 and 3.4) • Badger – CoCP Part A (paragraphs 7.2.3, 7.2.9, 7.2.28-7.2.31) and CoCP Part B (paragraphs 3.3 and 3.4) • Water vole – CoCP Part A (paragraphs 7.2.3, 7.2.9, 7.2.32-7.2.39) and CoCP Part B (paragraph 3.1) • Nesting birds – CoCP Part A (paragraphs 7.2.9, 7.2.16-7.2.21) • Otter – CoCP Part A (paragraphs 7.2.40-7.2.45) • Reptiles - CoCP Part A (paragraphs 7.2.9, 7.2.46-7.2.49) and CoCP Part B (paragraphs 3.1 and 3.3)

ExQ1	Question to	Question	Response
			• Invertebrates - CoCP Part - CoCP Part A (section 5.9, paragraphs 7.2.27, 7.2.26, 7.2.53, 7.2.62-7.2.69,) and CoCP Part B (paragraphs 3.1, 3.3 and 3.4) • Invasive species - CoCP Part A (paragraph 7.2.58) CoCP Part B (paragraph 3.1) • Trees and hedgerows - CoCP Part A (paragraphs 7.2.26, 7.2.62-7.2.69) and CoCP Part B (paragraphs 3.3 and 3.4) • Riparian and aquatic vegetation (including fish and aquatic invertebrates) – CoCP Part A (paragraphs 7.2.50-7.2.55) and CoCP Part B (paragraph 3.1) <u>Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**]</u> The Applicant acknowledges that the Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**] relates to the landscape masterplan as defined for the proposed WWTP and discussed within the TWG with the stakeholders included in the Council. Table 7-1 within ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**] summarises the future monitoring mechanisms to implement and monitor created and reinstated habitats. These are explained further in reference to BNG above. Habitat compensation in relation to Works Plan 32 as shown in Works Plans (App Doc Ref 4.3) [**AS-150**] including long term management and monitoring is secured by Requirement 10 in the draft DCO (App Doc Ref 2.1) [**AS-139**], which requires the preparation of detailed outfall management plans for the construction and operation phase of the Proposed Development. The Applicant is satisfied that Requirements 7, 8, 9, 10, 11, & 22 adequately secure mitigation and management of all receptors identified within ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**]. <u>Construction Outfall Management Plan or Operational Outfall Management Plan</u> Subsequent to the application, Outline Outfall Management & Monitoring Plan (5.4.8.24) [**AS-073**] has been submitted. This includes measures to be incorporated into a detailed plan developed for both the construction and operational phases of the Proposed Development. This is secured by DCO Requirement 10. <u>Lighting Design Strategy (App Doc Ref 5.4.2.5) [**APP-072**]</u> The response in relation to the Low Fen Drove Way Grasslands and Hedgerows CWS above sets out the conclusion of the lighting impact assessment in relation to the CWS, identifies where in ES Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [**AS-100**] it is set out and how mitigation is secured.
5.9	CCC	**Cambridge Local Plan 2018** Do you consider that ES Chapter 8 [AS-026] sufficiently addresses Policy 70 of the Cambridge Local Plan 2018, notably in relation to the requirement to assess the Proposed Development on Cambridgeshire-specific biodiversity action plan species and their habitats?	
5.10	Applicant, SCDC	**Clarification of information regarding SCDC's RR** In SCDC's RR [RR-004], clarification is sought regarding ES Chapter 8 Table 2-8 [AS-026]. Please liaise with one another to establish what clarification is required and suitably address this matter.	The Applicant is in active dialogue SCDC to understand the additional clarification required and will continue to work with SCDC to address any other issues as part of the ongoing Technical Working Group for Biodiversity. A record of any ongoing concerns and the outcome of discussions regarding those concerns will be recorded in the Statement of Common Ground.
5.11	Applicant	**Scope of the Landscape, Ecological, Recreation Management Plan** NE [RR-015] and National Trust [RR-031] consider that the scope of the Landscape, Ecological, Recreation Management Plan (LERMP) should be extended to cover the *entire* project area and for this to include ecological mitigation, enhancements (including BNG) and management across the wider project area. Please provide justification as to why the LERMP does not cover the whole of the project area, or update the LERMP accordingly in liaison with relevant stakeholders.	The geographical focus of ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**] is on the immediate area around the Proposed Waste Water Treatment Plant (WWTP). The Landscape Masterplan contained in ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**] does not include the areas of the tunnel or pipeline structures or the outfall to the River Cam. The landscape, recreational and biodiversity contexts of these elements of the Proposed Development, together with potential environmental effects and mitigation, are outlined in the Environmental Statement. Commitments to reinstate land after construction are set out in the Code of Construction Practice Parts A & B (Appendix 2.1 & 2.2, App Doc Ref 5.4.2.1 & 5.4.2.2). The Applicant acknowledges that ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**] relates to the landscape masterplan as defined for the proposed WWTP and discussed within the TWG with the stakeholders included in the Council.

ExQ1	Question to	Question	Response
			For areas of the Waterbeach pipeline, shafts 4 and 5 and compound areas at the outfall, Waterbeach and at shaft 4 and 5 and the land required for the construction of the FE and storm pipelines between the outfall and Horningsea Road the land will be reinstated in accordance with the requirements of the CoCP Part A and B, including the following: • Any planting as part of the Proposed Development which dies or becomes seriously damaged or diseased within five years after completion of construction will be replaced in the first available planting season with stock of the same species and size as that originally planted unless otherwise agreed with the Local Planning Authority • In locations of retained hedgerow there shall be consideration of additional "thickening" to promote habitat connectivity for bats, in particular making use of existing hedgerow removed during construction. Any works to hedgerow would be under the supervision of a suitably experienced ecologist In relation to habitats affected by the outfall within Works Plan 32 the following measures will apply: • Installation of the outfall to minimise the extent of permanent loss of riverbank • Installation of the river protection extents to include embedded design features to reinstate riparian reedbed habitat • Improvement of the river bank downstream of the outfall (within the extent of Works Plan 32) by translocation of reedbed to thicken the riparian margin • Translocation of reedbed to be incorporated into the created ditch habitats within Works Plan 39 • Pre works checks and translocation of important botanical species • These general applicable measures in the CoCP Part A would also apply In relation to works to the ditch parallel to the River Cam that affect water vole habitat: • Creation of 84m of habitat within Works Plan 39 in advance of the start of construction as set out within draft water vole licence application (ES Appendix 8.22 Water Vole Natural England Ghost Licence Method Statement (App Doc Ref 5.4.8.22) [**APP-107**]) • Minimising the extent of the area required for the construction of the outfall through altering the design so that the ditch profile could be reinstated upon completion of the works. For areas outside of the landscape masterplan the mitigation and management activities are secured as follows: • Management and monitoring of the outfall area including Works Plan 32 as shown in Works Plans (App Doc Ref 4.3) [**AS-150**] as required by Habitat compensation in relation to Works Plan 32 including long term management and monitoring is secured by Requirement 10 which requires the preparation of detailed outfall management plans for the construction and operation phase of the Proposed Development. • Management and monitoring of compensation habitat for water vole in accordance with the licence • Monitoring of reinstated hedgerows as required by the CoCP Part A (App Doc Ref 5.4.3.1) • Aftercare land and soils as required by SMP Table 7-1 provides a summary of future monitoring mechanisms to implement and monitor created and reinstated habitats as part of the Proposed Development of the ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**]. The Applicant is satisfied that Requirements 7, 8, 9, 10, 11, & 22 adequately secure mitigation and management of all receptors identified within the ES Chapter 8 Biodiversity.
5.12	Applicant	**Impacts from recreational pressure on Stow-cum-Quy Fen SSSI** NE [RR-015] raises concerns regarding the potential for significant adverse effects on Stow-cum-Quy Fen SSSI through the proposed access enhancements. NE suggests that rigorous survey evidence to inform a robust assessment of recreational pressure impacts on the SSSI should be provided in order to	The Applicant refers to the ES Chapter 8: Biodiversity (App Doc Ref 5.2.8) [**AS-026**] in which the assessment has not identified significant residual effects on Stow-cum-Quy Fen SSSI, however, the following are proposed: • In relation to the Bridleway/Permissive Paths the Applicant will ensure as part of the ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (LERMP) (App Doc Ref 5.4.8.14) [**AS-066**] that

ExQ1	Question to	Question	Response
		assess the impacts of recreation on the SSSI, or that a post-construction monitoring programme and adaptive landscape management approach, progressed through a wider partnership arrangement, could provide acceptable mitigation. Please confirm how you intend to address this matter.	there will be adequate signage to ensure appropriate use of the Paths/Bridleway, and behaviour, to limit any impact. • Long-term application of the LERMP which requires that the operator to prepare a detailed management and maintenance plan (secured through requirement 11), based on the LERMP which will be agreed with key stakeholders. In relation to users, section 4 of LERMP includes the requirement to complete user survey at least twice a year for the first 5 years of operation to understand how people are interacting with the recreational space and accessing the wider network of PRoW and permissive paths. The Applicant also refers to paragraph 4.1.2 and 4.1.4 within section 4 of ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**], which confirms the commitment to set up an Advisory Group. Through this group matters such as recreational users can continue to be discussed and managed. The Applicant would continue to engage with relevant stakeholders including, but not limited to, councils (such as Cambridgeshire County Council, Cambridge City Council, South Cambridgeshire District Council and East Cambridgeshire District Council) and Natural England in relation to the development of the detailed LERMP including the terms of reference for the Advisory Group. The group terms of reference would form part of the detailed LERMP. The implementation of the measures within ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**] are secured by Schedule 2 of the draft DCO (App Doc Ref 2.1) [**AS-139**] relating to the detailed landscape scheme and detailed Landscape, Ecological and Recreational Management Plan, which will be approved by Natural England and the relevant planning authority. Requirement 11 of the draft DCO fulfils this requirement and requires that the detailed plan accords with ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**].
5.13	Applicant, National Trust (NT), Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire (WTBCN), CCoC, CCC, SCDC	**Impacts from recreational pressure on Stow-cum-Quy Fen SSSI** Do you agree with the proposed wording set out on pages 18 and 19 of NE's RR [RR-015] regarding dDCO R11 and do you consider this would act as a suitable solution to address concerns regarding the impacts from increased recreational pressure on Stow-cum-Quy Fen SSSI ([RR-015] para 4.3.21 and 4.3.22)?	Table 5.1 (Monitoring) of the LERMP (App Doc Ref 5.4.8.14) [**AS-066**] commits the Applicant to conducting user surveys on a bi-annual basis for the first 5 years and then every 5 years after that to understand how people are interacting with the recreational space and accessing the wider network of PRoW and permissive paths. The Applicant believes this plus the commitment to an adaptive management approach (para 5.1.5 of the LERMP) are more than sufficient to monitor and manage any potential future increases in recreational pressure that may occur. The Landscape Masterplan, as stated in paragraphs 2.1.7 and 3.4.4 of the LERMP, has been designed to complement and provide enhanced functionally-linked habitat connectivity into the Cambridge Nature Network. The Applicant is committed through the development and approval of the LERMP to continue engagement with Natural England on this. The Applicant considers opportunities outside of the Scheme Order Limits to be outside of the scope of the project, however, as an organisation the Applicant's Biodiversity Strategy (published in 2019) commits it to working in collaboration with others to conserve habitats and species across the region and the Applicant is happy to explore potential partnerships through the wider organisation.
5.14	NE, EA, NT, CCC, CCoC, SCDC, WTBCN	**Comments on updated information submitted by the Applicant** Please review and comment on the additional information provided by the Applicant in response to the ExA's Procedural Decision [PD-004], regarding the impacts of the Proposed Development on biodiversity with particular reference (but not limited to): the outline Outfall Management and Monitoring Plan (oOMMP) [AS-073]; the draft CEMP [AS-057]; Commitments Register [AS-125]; and the Preliminary Ecological Appraisal [AS-072].	
5.15	Applicant, NE	**Protected species licence applications** Please provide an update on progress of the draft protected species licence applications. **To the Applicant only** – please confirm when updated amendments to the vole and bat method statements will be provided (if not done so already) to NE and do you intend to update them in line with NE's recommendations?	The Applicant has received a Letter of No Impediment (LONI) issued on 25 Jan 2023 in relation to the ES Appendix 8.22 Water Vole Natural England Ghost Licence Method Statement (App Doc Ref 5.4.8.22) [**APP-107**], from Natural England. This provides points to be addressed prior to formal submission of the licence, which would be post DCO consent. The points raised by NE will be amended/added to this formal submission post DCO consent. A second LONI was issued to the Applicant from Natural England on the 14 June 2023 in relation to the ES Appendix 8.20 Bat Natural England Ghost Licence Method Statement (App Doc Ref 5.4.8.20) [**APP-105**], similarly this includes points to be addressed prior to formal submission, post DCO consent. The points raised by NE will be amended/added to this formal submission post DCO consent.

ExQ1	Question to	Question	Response
5.16	CCoC	**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?	
5.17	Applicant	**Bat surveys** Please respond to concerns raised on the limitations and extent of surveys for bats, particularly in relation to roosting and foraging (e.g. [RR-001 and RR-083]).	The Applicant undertook surveys as outlined in Table 2-6 of ES Chapter 8: Biodiversity (App Doc Ref 5.2.8) [**AS-026**]. These were preliminary bat roost assessments, aerial tree assessments, and bat emergence and re-entry surveys within the Order Limits plus 100m buffer; bat activity transects within the proposed WWTP, the existing Cambridge WWTP and adjacent to the River Cam, including the treated effluent discharge outfall to the River Cam; and static surveys at four locations within the Scheme Order Limit. The results of the surveys are provided within ES Appendix 8.7 Bat Technical Appendix (App Doc Ref 5.4.8.7) [**APP-092**], and impacts are assessed within ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**]. The surveys were carried out in line with the Bat Survey Guidance (Collins 2016), and the approach for these was agreed with the Technical Working Group in 2019 (Table 8-12 in ES Volume 4 Chapter 4 Appendix 4.2 Scoping Report (App Doc Ref 5.4.4.2) [**APP-080**]), with limitations presented within ES Appendix 8.7 Bat Technical Appendix (App Doc Ref 5.4.8.7) [**APP-092**]. The limitations that occurred were taken into consideration when assessing impacts, and a precautionary approach was taken. The surveys carried out allowed the Applicant to understand the species assemblages present, and assess the impacts of the proposed development on them. Information that was deemed sensitive was redacted to protect species. Whilst records of western barbastelle were recorded during the surveys, no roosts were found for this species. Western barbastelle were recorded during transect surveys on Low Fen Drove Way Grasslands and Hedges CWS, approximately 30m to the north of the A14 (280m east of the River Cam) and approximately 280m to the south of the A14 (60m east of the River Cam). The habitats associated with these records will be retained. Further survey (for example radio-tracking) would be disproportionate to the assessed impacts on this species, because there is no loss of any roost for this species, with retained (and creation of new) commuting and foraging routes. The proposals will include significant planting and habitat enhancement (as documented within ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**]) of benefit to bat species (including western barbastelle), with no roost loss for this species.
5.18	Applicant	**Effects of operational lighting on bats** With reference to the comments raised on the effects of operational lighting on bats (e.g. [RR-001] and [RR-015]) please provide further details of the operational lighting and how the identified mitigation measures would be implemented and secured?	The Applicant will submit a detailed lighting plan post DCO consent, to Natural England, accompanying the bat licence application. This document will provide the detail on operational lighting required and will outline mitigation and how this is secured.
5.19	Applicant	**Effects** The summary and conclusion of ES Chapter 8 [AS-026] suggests that the impact of the loss of habitats is reduced from a significant adverse effect to non-significant following mitigation. However, Table 5-1 summarising the effects confirms a residual effect of moderate adverse (significant) for loss of ditch habitats. Please provide further clarification on this matter.	The Applicant will provide a clarification of text in ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**]. This will mean that the text within Table 5-1 will be amended to state that there is no significant effect. This will reflect the compensation of ditch habitat as outlined in ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**]. This update will be provided for Deadline 2, the reason for which is explained in the response to ExQ1 5.4.
5.20	Applicant	**Effects** The summary in ES Chapter 8 [AS-026] suggests that all significant effects identified from operational activities are mitigated, and reduce the impacts to non-significant. However, the conclusion of ES Chapter 8 suggests that the residual effect of operational impacts through scour (directly and indirectly) upon the River Cam CWS remain significant. Please clarify.	The Applicant will provide clarification of the text in ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**], which will be updated to reflect that the impacts are considered to be not significant. This update will be provided for Deadline 2.
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?	The Applicant has discussed this design option in early discussions with the Environment Agency when considering the options for the outfall design. The Applicant has confirmed it does not consider it to be technically feasible at this location. The incorporation of a reed bed in this location would mean permanent changes to the existing PRoW and existing ditch, furthermore the sizing of a reedbed to offer meaningful energy dissipation and water treatment function for the size of the catchment area would be in the order of 90 hectares. The rip rap and outfall design will provide appropriate dissipation for normal maximum and instantaneous storm flows whilst not inhibiting the flow from the outfall as the outfall pipework is designed to be submerged.

ExQ1	Question to	Question	Response
5.22	Applicant	**Loss of reed habitat** In para 4.2.59 of ES Chapter 8 [AS-026] it is acknowledged that *There will be an overall loss of 50m2 of reed and despite the embedded measures there would still be a change of up to 70m from natural riverbank to modified river bank which is permanent.* Given that NPSWW states that applicants should demonstrate that habitats will, where practicable, be restored after construction works have finished, why is there an overall loss of 50m2 of reed? Are there further opportunities for replacement reed to compensate for this loss?	The loss of reedbed will be compensated for as the Applicant is committed to achieving at least a 20% net gain in all biodiversity unit types. Therefore, there will not be a net loss of reedbed habitat. The loss of reedbed habitat units will occur at the proposed new outfall location on the River Cam as a result of increased riparian encroachment. This is detailed in paragraph 5.3.4 of ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**]. Paragraph 5.1.6 of ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**] acknowledges that there will be a loss in biodiversity units of reedbeds and states the methods by which this loss will be compensated to avoid trading down is outlined in Appendix C (Outline River Units Net Gain Strategy) of ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**]. Reedbed translocation and creation is proposed as detailed in the Outline Outfall Management & Monitoring Plan (App Doc Ref 5.4.8.24) [**AS-073**] and ES Appendix 2.2 Code of Construction Practice Part B (App Doc Ref 5.4.2.2) [**AS-161**]. The Applicant will update the following documents with regards to reedbed loss and compensation: - Table 5-1, Appendix A, Appendices D to J in ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**], Section 1.2 and Figure 1 in Appendix C in ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**]. Uncompensated unit loss for reedbed is 0.17 units. It is proposed that 0.0245ha of reedbed will be planted in the new ditches in Works Plan 39, to achieve 20% BNG and remove the trading down issue. - The paragraphs (4.2.33, 4.2.59, 4.2.69, 4.2.72, 5.1.8) referring to loss of reedbed habitat in ES Chapter 8 Biodiversity (5.2.8) [**AS-026**]. There will be an overall loss of 0.01ha of reedbed, however, 0.0245ha are proposed as compensation within the new ditches in Works Plan 39. - Text in Table 5-1 and table in Appendix A referring to reedbed translocation in the Outline Outfall Management & Monitoring Plan (App Doc Ref 5.4.8.24) [**AS-073**]. - Section 3.1, referring to reedbed translocation in the ES Appendix 2.2 Code of Construction Practice Part B (App Doc Ref 5.4.2.2) [**AS-161**]. This update will be provided for Deadline 2, the reason for which is explained in the answer to ExQ1 5.4.
5.23	Applicant	**Impacts on reed habitat** ES Chapter 8 [AS-026] states that *(4.2.148) Areas of marginal vegetation (reed) will be moved to nearby downstream location (as directed by the ECoW) to replicate available habitat that would otherwise be lost due to the construction of the treated effluent discharge outfall. This will be included in the OMMP.* This indicates a like for like replacement of reed. However, para 4.2.59 states that there would be a loss of 50m2 of reed – please clarify. If there is not a like for like replacement of reed habitat, does this affect the finding of a residual effect of neutral which is not significant on aquatic species-fish (or any other impacts affected by this finding)?	The Applicant is committed to achieving at least a 20% net gain in all biodiversity unit types. Therefore, there will not be a loss of reedbed habitat. Paragraph 5.1.6 of ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**] acknowledges that there will be a loss in biodiversity units of reedbeds and states the methods by which this loss will be compensated to avoid trading down is outlined in Appendix C (Outline River Units Net Gain Strategy) in ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**]. The Applicant will update the following documents to ensure details of reedbed loss and compensation are reported consistently across the documents: - Table 5-1, Appendix A, Appendices D to J in ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**], Section 1.2 and Figure 1 in Appendix C in ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**]. Uncompensated unit loss for reedbed is 0.17 units. It is proposed that 0.0245ha of reedbed will be planted in the new ditches in Works Plan 39, to achieve 20% BNG and remove the trading down issue. - The paragraphs (4.2.33, 4.2.59, 4.2.69, 4.2.72, 5.1.8) referring to loss of reedbed habitat in ES Chapter 8 Biodiversity (5.2.8) [**AS-026**]. There will be an overall loss of 0.01ha of reedbed, however, 0.0245ha are proposed as compensation within the new ditches in Works Plan 39. - Text in Table 5-1 and table in Appendix A referring to reedbed translocation in the Outline Outfall Management & Monitoring Plan (App Doc Ref 5.4.8.24) [**AS-073**]. - Section 3.1, referring to reedbed translocation in the ES Appendix 2.2 Code of Construction Practice Part B (App Doc Ref 5.4.2.2) [**AS-161**]. This update will be provided for Deadline 2, the reason for which is explained in the answer to ExQ1 5.4.
5.24	Applicant	**Ecological mitigation, compensation and enhancement measures** Please provide a table which clearly and separately sets out the proposed ecological mitigation, compensation and enhancement measures. This is required in order to clarify the proposed BNG enhancements, in comparison to mitigation or compensation for loss of habitats.	The Applicant refers to Table below in relation to this response.

ExQ1	Question to	Question	Response

Habitat	Impact	Mitigation	Compensation	Enhancement
Waterbeach pipeline and transfer tunnel				
Cereal crops	Temporary loss during construction due to open-cut laying of pipelines, construction compounds and access routes to these areas	Reinstated post-construction	None required	None required
Developed land; sealed surface	Temporary loss during construction due to open-cut laying of pipelines, construction compounds and access routes to these areas	Reinstated post-construction	None required	None required
Vacant/derelict land/ bareground	Temporary loss during construction due to open-cut laying of pipelines, construction compounds and access routes to these areas	Reinstated post-construction	None required	None required
Introduced shrub	Temporary loss during construction due to open-cut laying of pipelines and access routes	Reinstated post-construction	None required	None required
Lowland mixed deciduous woodland	Temporary loss during construction due to access routes	Reinstated post-construction	None required	None required
Other woodland; broadleaved	Temporary loss during construction due to open-cut laying of pipelines and access routes	Reinstated post-construction	None required	None required
Reedbeds	No impact due to use of horizontal directional drilling under River Cam (location of this habitat)	None required	None required	None required
Ruderal/Ephemeral	Temporary loss during construction due to open-cut laying of pipelines	Reinstated post-construction	None required	None required
Other neutral grassland	Temporary loss during construction due to open-cut laying of pipelines, construction compounds and access routes to these areas	Reinstated post-construction	None required	None required
Modified grassland	Temporary loss during construction due to open-cut laying of pipelines, construction compounds and access routes to these areas	Reinstated post-construction	None required	None required
Mixed scrub	Temporary loss during construction due to open-cut laying of pipelines, construction compounds and access routes to these areas	Reinstated post-construction	None required	None required

ExQ1	Question to	Question	Response				
			Line of trees	Temporary loss during construction due to open-cut laying of pipelines, construction compounds and access routes to these areas	Reinstated post-construction	None required	Proposed additional tree infills along existing line of trees running east from Horningsea Road, and additional tree and whip planting along Horningsea Road. These provide ecological enhancement as well as primary mitigation for landscape and visual impact purposes.
			Hedgerow	Temporary loss during construction due to open-cut laying of pipelines, construction compounds and access routes to these areas	Reinstated post-construction	None required	None required
			Ditch	Temporary loss during construction due to open-cut laying of pipelines, construction compounds and access routes to these areas	Reinstated post-construction	None required	None required
			River	No impact due to use of horizontal directional drilling under River Cam (location of this habitat)	None required	None required	None required
			Floodplain wetland mosaic (Coastal and Floodplain Grazing Marsh)	No impact due to use of horizontal directional drilling under River Cam (location of this habitat)	None required	None required	None required
			Existing WWTW				
			Developed land; sealed surface	Decommissioning works will not impact upn this habitat type at this location.	None required	None required	None required
			Vacant/derelict land/ bareground	Decommissioning works will not impact upn this habitat type at this location.	None required	None required	None required
			Introduced shrub	Decommissioning works will not impact upn this habitat type at this location.	None required	None required	None required
			Lowland mixed deciduous woodland	Decommissioning works will not impact upn this habitat type at this location.	None required	None required	None required
			Other coniferous woodland	Decommissioning works will not impact upn this habitat type at this location.	None required	None required	None required
			Other woodland; broadleaved	Decommissioning works will not impact upn this habitat type at this location.	None required	None required	None required
			Other woodland; mixed	Decommissioning works will not impact upn this habitat type at this location.	None required	None required	None required
			Ponds (Non-Priority Habitat)	Decommissioning works will not impact upn this habitat type at this location.	None required	None required	None required

ExQ1	Question to	Question	Response

Ruderal/ Ephemeral	Decommissioning works will not impact upn this habitat type at this location.	None required	None required	None required
Modified grassland	Temporary loss during construction due to access and compound location	Reinstated post-construction	None required	None required
Mixed scrub	Decommissioning works will not impact upn this habitat type at this location.	None required	None required	None required
Line of trees	Decommissioning works will not impact upn this habitat type at this location.	None required	None required	None required
Hedgerow	Potential impact to an ornamental hedge through removal.	Reinstated post-construction	None required	Species composition will be native-only and diversity increased to support Milton Road Hedgerows City Wildlife Site
Ditch	Decommissioning works will not impact upn this habitat type at this location.	None required	None required	None required
Proposed WWTW (including Outfall)				
Cereal crops	Within land required for the landscape masterplan, this habitat will be lost permanently; other areas required for the final effluent and storm pipelines will be temporarily lost	Reinstated post-construction (outside landscape masterplan area)	None required	None required
Developed land; sealed surface	Within land required for the landscape masterplan, this habitat will be lost permanently	None required	None required; however additional areas of this type will be created	None required
Other woodland; broadleaved	This habitat will be retained.	None required	None required	There will be creation of new habitat of this type within the landscape masterplan area. This provides ecological enhancement as well as primary mitigation for landscape and visual impact purposes.
Ponds (Non-Priority Habitat)	No ponds are present within this area	None required	None required	Ponds will be created within the land required for the habitat masterplan to provide enhancements for species such as turtle dove
Reedbeds	This habitat will be lost permanently at the outfall location	None required	Reedbed habitat will be fully compensated within Works Area 39, as well as at the outfall location	Reedbed will be provided as enhancement within the newly created ditches in Works Area 39
Ruderal/ Ephemeral	This habitat (within Works Area 39) will be lost	None required	None required	None required

ExQ1	Question to	Question	Response

	permanently post-construction			
Other neutral grassland	This habitat will be retained	None required	None required	This habitat will be created within the land required for the landscape masterplan
Modified grassland	This habitat found within the area required for the landscape masterplan will be lost permanently; an area of this habitat found at the outfall will be lost both permanently (one section) and temporarily (another section); and other areas of this habitat will be retained	The area lost temporarily at the outfall will be reinstated	None required	None required
Mixed scrub	This habitat within the land required for the landscape masterplan will be permanently lost due to creation of habitats within the landscape masterplan. Other areas of this habitat will be retained	None required	Compensated within scrub elements of the landscape masterplan plantings	Additional scrub habitats will be provided within the landscape masterplan habitat creation
Line of trees	This habitat will be retained	None required	None required	Additional tree lines (and hedgerows with trees) will be planted. These provide ecological enhancement as well as primary mitigation for landscape and visual impact purposes
Hedgerow	Hedgerows within the land required for the landscape masterplan will be permanently lost. Other hedgerows will be retained	None required	Hedgerows will be either translocated to new positions within the Scheme Order Limits, if appropriate, or will be compensated by provision of new hedgerows within the land required for the landscape masterplan	Additional hedgerows lengths will be planted to provide an enhancement
Ditch	The ditch (wet) within the land required for the landscape masterplan will be retained. Dry ditches lost as part of the landscape masterplan works will be permanently lost. A section of ditch adjacent (parallel) to the outfall will be partially permanently lost, with a section temporarily lost	None required	Compensation of the full length of lost ditch will be provided within Works Area 39. This is in addition to the ditch habitat compensation required in relation to water vole	Ditches as enhancement will be provided within Works Area 39

<table>
<tr><th>ExQ1</th><th>Question to</th><th>Question</th><th>Response</th></tr>
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<table>
<tr><td>River</td><td>The river will be retained, however there will be temporary impacts on this habitat due to construction methodology (cofferdam). There will be permanent riparian encroachment to this habitat post-construction due to the new outfall</td><td>Post construction, the cofferdam will be removed</td><td>Offsite compensation will be required in relation to this habitat</td><td>Enhancement measures will be provided offsite for this habitat type</td></tr>
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</td></tr>
<tr><td>5.25</td><td>Applicant</td><td>Biodiversity Net Gain
How has a 20% minimum BNG across all unit types been determined? Are there any policy grounds this is this based on?</td><td>Section 1.6 of the ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163] provides a summary of the legislation, policy and guidance relevant to BNG.

For national policy, paragraph 1.6.4 of the ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163] states that the National Planning Policy Framework (NPPF) (Ministry Housing, Community & Local Government, 2021), makes general provisions for the delivery of BNG. The NPPF states that “planning policies and decisions should…identify and pursue opportunities for securing measurable net gains for biodiversity” although no numerical definition of “net gains for biodiversity” is provided.

For local policy, paragraph 1.6.5 of the ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163] provides details on the SCDC Doubling Nature Strategy 2021, which sets an aspirational goal of 20% BNG for developments within the district. BNG is also outlined in the Greater Cambridge Biodiversity Supplementary Planning Document 2022, this document does not set 20% BNG as a fixed target. However, it is noted although a mandatory requirement for 10% net gain in biodiversity value is within the Environment Act 2021, a value of 20% is likely to be encouraged as best practice in order to meet the Natural Cambridgeshire target of doubling the amount of land managed for nature. The Greater Cambridge Biodiversity Supplementary Planning Document 2022 also advises that should new Local Plan policies instruct a higher percentage of Biodiversity Net Gain than that nationally mandated, that the higher of the two amounts (of Biodiversity Net Gain) shall be the minimum requirement for development.

Table 4-2 of ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163] also provides feedback from Technical Working Group (TWG) meeting on 11 March 2021 when the Greater Cambridge Partnership (GCP) requested that the project should target 20% rather than 10% BNG.

Furthermore, as published in the June 2023 Cambridge City Council and South Cambridgeshire District Council Policy Review of the Adopted Local Plans for Greater Cambridge it states “At an Oxford-Cambridge Partnership level the authorities have agreed a set of Environmental Principles which include the aims of doubling the area of land managed primarily for nature, and also to deliver a minimum 20% biodiversity net gain on development sites. These ambitions, together with the relatively low level of designated sites and priority habitats in Greater Cambridge, highlight the need for development to bring further net gains beyond the 10% proposed nationally. This will be addressed in the emerging Greater Cambridge Local Plan.”

Section 2 of the ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163] provides details on the methods used to calculate BNG. The Natural England Biodiversity Metric 3.0 calculator tool was used.</td></tr>
<tr><td>5.26</td><td>Applicant</td><td>Biodiversity Net Gain – river units
The BNG Assessment Report [AS-161] states that Schedule 2 of the dDCO would commit the Proposed Development to achieving 20% gain in river units and avoid a trading down in habitat value. However, R11(2) of the dDCO excludes river units, and R10(4)(e) does not specify the minimum biodiversity net gain comprising river units.
a) Please therefore explain how the proposed 20% BNG relating to river units would be captured by the dDCO?
b) Should river units be captured via a legal agreement i.e. a Section 106 Agreement, as suggested by SCDC [RR-004]?
c) Please explain how the 20% BNG set out in R11(2) of the dDCO [AS-139] meets the 6 tests for conditions set out in para 56 of the NPPF?</td><td>a) The Applicant has amended requirement 10(6)(e) to ensure that 20% BNG in respect of river units is delivered. The requirement now reads:

“(6) The detailed operational outfall management and monitoring plan submitted for approval must accord with the measures set out in the outline outfall management and monitoring plan relating to the operation of the outfall and must include-
…
(e) details of measures for the achievement of twenty percent biodiversity net gain comprising river units within or outside of the Order limits”

Some consequential amendments have been made to requirement 11(2).</td></tr>
</table>

ExQ1	Question to	Question	Response
			b) The Applicant considers that a DCO requirement is appropriate at this stage and not a section 106 agreement. This is because the requirement sufficiently secures the overall delivery of 20% and is able to cover the potential for on and off site provision if necessary (where off site delivery would be secured in future at the appropriate time through various mechanisms), but a section 106 agreement would need to be drafted now with very narrow scope where it is difficult and unnecessary to refine the detail of delivering the units. c) The power to impose requirements in connection with the development for which consent is granted is provided under s120(1) PA 2008. Requirements 'correspond' to (or are 'similar' to) conditions which could have been imposed on the grant of any permission, consent or authorisation, and paragraph 15.2 of PINS Advice Note 15 states that they "*should therefore be precise, enforceable, necessary, relevant to the development, relevant to planning and reasonable in all other respects*". This is also reflected in paragraph 3.1.6 of the NPS for waste water and mirrors the advice at NPPF paragraph 56. Section 1.6 of the ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**] provides a summary of the legislation, policy and guidance relevant to BNG and the basis on which the Applicant has committed to achieving 20% minimum BNG across all unit types including in river units. This commitment meets the aspiration in SCDC's Doubling Nature Strategy 2021, the Greater Cambridge Biodiversity Supplementary Planning Document 2022 and the emerging GCLP and responds to the request for such a commitment made by the local authorities in the pre-application consultation stage. Given this, and the fact that the proposed development is situated within Green Belt wherein the landscape masterplan and LERMP are designed to reduce landscape and visual impacts, improve biodiversity and create opportunities for greater recreational use of the countryside consistent with the opportunities for mitigation recognised in the Greater Cambridge Green Belt Assessment (LUC, 2021), R10 and R11 are considered to be '*necessary, relevant to the development, relevant to planning and reasonable in all other respects'.* The terms of the requirements are also considered to have been drafted so that they are precise and enforceable, thereby meeting the tests of paragraph 15.2 of PINS Advice Note 15 (and NPPF paragraph 56).
5.27	Applicant	**Biodiversity Net Gain – river units** The BNG Assessment Report [AS-161] states that the 20% BNG for river units would be in part delivered through the creation of additional extents of river habitat through funding offsite habitat creation/ restoration initiatives. It is stated that this would either be from a supplier of BNG credits or the habitat creation would be funded directly to generate the units. It is stated that is that *river unit credits are not currently available on the market, but are likely to be in the near future*. This provides little certainty regarding the timescales in which the river units could come forwards, if at all. Please provide more detail on the likelihood of river units coming forwards and what mechanisms can be put in place in the event that they did not come forwards to ensure the proposed 20% BNG.	The Applicant does not consider that any alternative mechanism is necessary to ensure that 20% BNG is delivered because the amended DCO requirement 10(6)(e) (as explained in the Applicant's response to ExQ5.26 above) provides the necessary certainty that the overall 20% must be delivered and it will be for the Applicant to ensure delivery. The likelihood of river units coming forward is now high as there are viable projects available due to the BNG market demand developing since the Applicant's DCO application submission. There are a growing number of viable projects which the Applicant is actively seeking out A record of the outcome of these discussions will be set out in the Statement of Common Ground with the LPA. The Applicant has worked with them to date to confirm an agreed position. In the event a viable river unit opportunity did not materialise the Applicant would ensure delivery, which could be through widening the geographical area of search for projects.
5.28	Applicant	**Biodiversity Net Gain – river units** The BNG Assessment Report at para 1.2.1 of appendix C [AS-161] states that *although it is currently predicted that the Proposed Development will achieve more than 20% gain in all non-river habitat hypes, the river unit gain will be 4.30%.* Para 1.2.2 goes on to state that *In order to achieve a 20% BNG on river units the following is required: ' 0.03 BNG river units delivered on the River Cam (or a river/watercourse in Cambridgeshire) to deliver on 'high distinctiveness'; and ' 1.75 BNG units delivered via the creation of at least 227m of ditches which hold water all year*. The ExA require further clarity on the following matters: a) on page 'v' and in para 5.2.2 of the same report, the percentage increase in river units is suggested to be 3.49%, not 4.3% - which is correct, please update the document; b) does the proposal, without any offsite mitigation currently result in a net biodiversity gain in river units of 4.3% (or 3.4%); and c) as the 227m of ditches is proposed to be delivered on-site, is it the 0.03 BNG river units delivered on the River Cam which need to be delivered offsite to achieve a BNG of 20% for river units?	The Applicant will update Appendix C (Outline River Units Net Gain Strategy) in ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**]. a) Page v should read 3.49%. b) Yes, the proposal without any offsite mitigation or additional ditch creation within Work Area 39 (i.e. excluding the proposals in Appendix C of ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**]) currently results in a river unit gain of 3.49%. c) Yes, the 0.03 (to be replaced by 0.04) high distinctiveness river units is proposed to be delivered offsite / outside Order Limits to achieve 20% BNG and avoid trading down on river units as detailed under Sections 1.2 and 1.4 of the Appendix C (Outline River Units Net Gain Strategy) in ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**]. Ditch length proposed will also change in the updated Appendix C. These updates will be provided for Deadline 2 as the Applicant is currently in the process of engaging land owners on revised BNG figures the Applicant deems it more efficient to update the chapter as a whole at Deadline 2 along with the revision to the BNG figures.

ExQ1	Question to	Question	Response
5.29	Applicant	**Biodiversity Net Gain and the dDCO** Please confirm how the proposed BNG Audit Survey to review the delivery of the habitat creation and enhancement and to determine whether BNG is on track to be achieved at the end of the 30-year period would be secured through the dDCO.	Paragraph 6.1.6 of the ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**] states that a Biodiversity Net Gain Audit Survey and Report will be undertaken both at the end of construction and at the end of a 5-year aftercare period for new landscape planting and habitat creation. The purpose of this will be to review the delivery of the habitat creation and determine whether BNG has occurred. Schedule 2 of the DCO includes a series of requirements which obligate The Applicant to implement design and management activities. Section 6.1 of ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**] sets out how BNG would be secured. In summary this would be through the following: • Landscape masterplan (as required by DCO Requirement 11) • Provision of compensatory habitat as required as part of the water vole licence (as approved by Natural England through the species licence) • Creation of wet ditch within Works Plan 39 (as approved by the LPA in relation to DCO Requirement 10) • Application of the CoCP (DCO Requirement 8 and 9). Requirement 11(2) in the draft DCO (App Doc Ref 2.1 Rev 05 submitted at Deadline 1) states 'The detailed LERMP submitted for approval must accord with the measures set out in the LERMP and must detail how the measures contained within it contribute towards the achievement of twenty percent biodiversity net gain for the whole of the authorised development excluding any biodiversity net gain to be provided as river units and delivered through the operational outfall management and monitoring plan.' The LERMP (App Doc Ref 5.4.8.14) [**AS-066**] states for the landscape masterplan area, after the first 12 months, inspections would be carried out annually for the first five years and then every five years for a period of 30 years. The outline OMMP (App Doc Ref 5.4.8.23) [**AS-073**] Table 7-1 states the following in relation to operation and maintenance checks: • For the ditch network checks will be undertaken annually for the first 5 years and every 5 years subsequently for 30 years; and • Biodiversity net gain habitats every five years. The Applicant will update the outline Outfall Management and Monitoring Plan (oOMMP) to clarify the ongoing monitoring frequency in relation to all habitats related to the delivery of biodiversity net gain. These updates will be provided for Deadline 2 when the oOMMP is updated to reflect the updated BNG Report, as the Applicant deems it more efficient to update the document at Deadline 2 along with the revision to the BNG figures. The Applicant will consider whether it would be appropriate to provide an additional requirement to clarify how the BNG Audit Survey will be secured. If it is thought necessary, this will be done in the next draft DCO to be submitted.
5.30	Applicant	**Biodiversity Net Gain and compulsory acquisition** To what extent could BNG be achieved without the compulsory acquisition of land – i.e. what percentage of BNG could be achieved?	In the current absence of agreement with the relevant landowners, BNG could not be achieved on-site without compulsory acquisition. Please see further the Applicant's response to ExQ 8.17.
5.31	Applicant	**Above ground air valve structures** The BNG Assessment Report [AS-161] states that 16 above ground air valve structures are not considered. Please confirm the likely scale of these structures and provide further detail on why they have not been considered.	In Table 2-2 of ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**], it states that in the Waterbeach Pipeline there will be up to 16 above ground air valve structures the footprint of which will be minimal and is not considered in the assessment. Each air valve chamber footprint is a maximum of 600mm x 900mm clear opening (which equates to 0.54m^2). Due to the small footprint area on what is classified as 'cereal crops' in the Metric (with one likely to be in modified grassland), this footprint generates zero biodiversity units (and shows as zero hectares) in the Biodiversity Metric 3.0 calculation tool. The Applicant will update the text in Table 2-2 in ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [**AS-163**] to provide the clarification. The air valves will also be located below ground with an accessible manhole cover at ground level and be used during construction and occasionally during operation.

<table>
<tr><th>ExQ1</th><th>Question to</th><th>Question</th><th>Response</th></tr>
<tr><td></td><td></td><td></td><td>Further information on air valves is provided under paragraph 2.8.15 in ES Chapter 2: Project Description (App Doc Ref 5.2.2) [APP-034].

This update will be provided for Deadline 2 for reasons explained in ExQ1 5.28.</td></tr>
<tr><td>5.32</td><td>Applicant</td><td>Discharging proposed ecological requirements
At various points within ES Chapter 8 [AS-026], it is stated that ‘various consultees’ would be consulted in order to discharge proposed ecological requirements. Please provide details of who are the likely consultees for discharging requirements.</td><td>The Applicant considers that it is for the relevant planning authority to determine the parties with whom it needs to consult in discharging requirements, however, the Applicant has amended certain requirements in the dDCO submitted at Deadline 1 (App Doc Ref 2.1 Rev 04) to confirm that Natural England and the Environment Agency are to be consulted for approvals relating to the LEMRP and Outfall Management and Monitoring Plan, in response to Natural England’s Relevant Representation (see also the Applicant’s Response to this RR at ExQ1 5.12). These are the consultees envisaged by the Applicant in ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [AS-026]:
<table>
<tr><th>Item</th><th>Requirement</th><th>Consultee</th><th>Approver</th></tr>
<tr><td>LERMP – Detailed plan</td><td>Requirement 11</td><td>Natural England
National Trust
Trustees of Stow cum Quy Fen
Environment Agency</td><td>Local authority</td></tr>
<tr><td>CEMP – covering waterbeach pipeline</td><td>Requirement 9</td><td>Internal drainage board
Waterbeach development company
SLC Rail</td><td>Local authority</td></tr>
<tr><td>CEMP - covering outfall and final effluent pipeline works</td><td>Requirement 9</td><td>Conservators
Environment Agency</td><td>Local authority</td></tr>
<tr><td>CEMP – covering transfer tunnel works areas</td><td>Requirement 9</td><td></td><td>Local authority</td></tr>
<tr><td>CEMP covering land required for access, proposed WWTP and landscape masterplan – enabling works</td><td>Requirement 9</td><td></td><td>Local authority</td></tr>
<tr><td>CEMP covering land required for access, proposed WWTP and landscape masterplan</td><td>Requirement 9</td><td></td><td>Local authority</td></tr>
<tr><td>Lighting design – detailed</td><td>Requirement 7</td><td></td><td>Local authority</td></tr>
<tr><td>Outfall management plan – construction</td><td>Requirement 10</td><td>Natural England
Environment Agency
Conservators</td><td>Local authority</td></tr>
<tr><td>Outfall management plan – operation</td><td>Requirement 10</td><td>Natural England
Environment Agency
Conservators</td><td>Local authority</td></tr>
<tr><td>Detailed water monitoring plan</td><td>Requirement 22</td><td>Natural England</td><td>Local authority
Environment Agency</td></tr>
</table></td></tr>
</table>

<table>
<tr><th>ExQ1</th><th>Question to</th><th>Question</th><th>Response</th></tr>
<tr><td>5.33</td><td>Applicant</td><td>Reinstatement of habitats
There is a lack of specificity regarding the timescales for the reinstatement of habitats set out within ES Chapter 8 and the CoCP Part A. Please can this be made more specific.</td><td>
Table 7-1 provides a summary of future monitoring mechanisms to implement and monitor created and reinstated habitats as part of the Proposed Development of the ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163].

Paragraph 2.2.7 of the of the ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163] states: “Temporary habitat loss will occur during construction (for example because of land temporarily required for haul routes, access roads, compounds, spoil heaps, shafts as well as open cut areas for pipeline installation), the extent of these areas in the calculations is based on Works Plans (App Doc Ref 4.3) [APP-017] and Land Plans (App Doc Ref 4.4) [APP-018]. These habitats are planned to be reinstated post works”.

Habitats that were not part of the enabling phase mitigation and can only be reinstated after construction activities cease will be reinstated once construction has been completed. Paragraph 7.2.68 of CoCP Part A (App Doc Ref 5.4.2.1) [APP-068] also states that: “Reinstatement planting will be undertaken in the first available planting season following construction.” Paragraph 7.2.69 requires that “planting as part of the Proposed Development which dies or becomes seriously damaged or diseased within five years after completion of construction will be replaced in the first available planting season with stock of the same species and size as that originally planted unless otherwise agreed with the Local Planning Authority”. Therefore there would be monitoring and potential further works to reinstated areas in relation to this measure within the CoCP Part A.

In relation to timing of reinstatement activities by different project components the Applicant refers to the table provided below. This is based on the indicative programme information provided in Section 3.1 ‘Construction phasing and sequence of assembly’ of the ES Chapter 2 Project Description (App Doc Ref 5.2.2) [APP-034].

<table>
<tr><th>Project element</th><th>Related works plan (s)</th><th>Reinstatement activities</th><th>Associated monitoring and any supplementary reinstatement activities</th></tr>
<tr><td rowspan="2">Land temporarily required for construction of the Waterbeach pipeline</td><td>29, 33, 34, 37</td><td>Early start – reinstatement completed by end year 2 of construction
Late start - reinstatement completed by end of year 4 of construction</td><td>Early start – year 3 , 4 and 5 of construction into year 1 -3 of operation
Late start – year 4 and 5 of construction into year 1 -4 of operation</td></tr>
<tr><td>35</td><td>Waterbeach spur within the extent of the landscape masterplan – not reinstated as this is wholly within the extent of landscape masterplan which would be completed in full by year 1 of operation</td><td>Covered by the monitoring requirement of the LERMP which is 30 years from operation start</td></tr>
<tr><td>Land temporarily required for the construction of the transfer tunnel</td><td>28, 29,</td><td>Reinstatement expected to be completed by end of year 3 of construction</td><td>Year 4 and 5 of construction and year 1 -4 of operation</td></tr>
<tr><td>Land temporarily required for the construction of FE</td><td>31</td><td>Reinstatement expected to be completed by end of year 3 of construction</td><td>Year 4 and 5 of construction and year 1 -4 of operation</td></tr>
</table>
</td></tr>
</table>

<table>
<tr><th>ExQ1</th><th>Question to</th><th>Question</th><th>Response</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td>pipeline and storm pipeline</td><td></td><td></td><td></td></tr>
<tr><td>Land required for the construction of the outfall</td><td>32</td><td>Reinstatement completed by year 3 of construction at the latest (end of year 2 if outfall construction starts in year 1)</td><td>Year 4 and 5 of construction and year 1 -4 of operation

If early start then year 3 ,4 and 5 of construction and into year 1-3 of operation</td></tr>
<tr><td>Land required for the construction of the proposed access, proposed WWTP and the landscape masterplan</td><td>22, 23, 15, 37, 21, 31, 38</td><td>Not reinstated to previous condition.
Footprint of access road and the proposed WWTP as permanent change in land use
Land required for the landscape masterplan delivered in phases with elements of early planting as indicated in section 3.2, Landscape masterplan phasing, of the LERMP (App Doc Ref 5.4.8.14) [AS-066]. Landscape masterplan completion by year 1 of operation.</td><td>30 years as required in relation to BNG</td></tr>
<tr><td>Land required within the extent of the existing Cambridge WWTP for shaft 1, 2 and 3</td><td>28, 25, 17</td><td>Reinstatement expected to be completed by end of year 4 of construction</td><td>Year 4 and 5 of construction into year 1 -4 of operation</td></tr>
</table>
</td></tr>
<tr><td>5.34</td><td>EA, NE, WTBCN</td><td>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?</td><td></td></tr>
<tr><td>5.35</td><td>Applicant</td><td>Impacts to designated sites through increase in flood levels
NE suggests that ES Chapter 8 [AS-026] does not appear to identify impacts to designated sites through increase in flood levels and that the Flood Risk Assessment (FRA) included in Appendix 20.1 of the Environmental Statement [APP-151] has not assessed the increases in downstream flood levels identified through hydraulic modelling in the Fluvial Model Report [ES Appendix 20.6 [AS-113]. Please explain why these impacts have not been assessed.</td><td>The Applicant has assessed the impacts upon designated sites through increases in flood levels. This assessment found that there would be negligible impact on the River Cam water levels, flows and flood extents as a result of the Proposed Development and no impact on flood risk, as reported within the ES Appendix 20.1 Flood Risk Assessment (App Doc Ref 5.4.20.1) [APP-151] and ES Chapter 20 Appendix 20.5 Fluvial Modelling Report (App Doc Ref 5.4.20.5) [AS-113].

The Applicant has discussed with both the Environment Agency and Natural England at a meeting on 22nd August 2023 and demonstrated that for the small magnitude 1 in 2 year event, where stage levels increased by 22mm, flood waters are maintained in channel. No downstream receptors are impacted. This response has been provided to RR-013 Issue 1.2.</td></tr>
<tr><td>5.36</td><td>SCDC, CCC</td><td>Review of ES Chapter 8 Biodiversity appendices
Have Appendix 8.4: Ornithology Baseline Technical [APP-089] and Appendix 8.8: Badger Technical Appendix [APP-093] now been reviewed and do you have comments on these documents?</td><td></td></tr>
<tr><td>5.37</td><td>Applicant</td><td>Mitigation
NE has requested [RR-015] that species mitigation, including for water voles, should be managed for the operational duration of the project, being secured through the LERMP. Can you confirm</td><td>The Applicant has provided a response to this in the Applicants Response to Relevant Representations (App Doc Ref 8.2).</td></tr>
</table>

ExQ1	Question to	Question	Response
		that this would be the case and that the LERMP will be updated accordingly? Please provide a timescale for this.	The Applicant does not agree that species mitigation should be captured solely through the LERMP as the scope of that document is for the area defined as the proposed WWTP. Species mitigation outside of the LERMP is adequately secured through Requirements 8, 9 and 10 of Schedule 2 of the dDCO (App Doc Ref 2.1) **[AS-139**] and the Natural England conservation licences for which Natural England has issued letters of no impediment on. Habitat creation for the purpose of mitigation which falls within the scope of the Outfall Management and Monitoring Plan will be managed for a minimum of 30 years in line with BNG commitments.
5.38	NE, EA	**Mitigation** Do you agree with the Applicant that mitigation measures related to the construction of the proposed River Cam outfall (to be set out within a detailed outfall management and monitoring plan (OMMP) – see p69/70 of [AS-026] / the outline OMMP [AS-073]) can be satisfactorily secured through a flood risk activities permit? Are proposed works in the area of the outfall, but not covered by the permit secured through the OMMP, satisfactorily secured by the CoCP Part A [APP-068]?	
5.39	NE, WTBCN, CCoC, CCC, SCDC	**Effects - habitats** In reference to the impacts of the Proposed Development on habitats within ES Chapter 8 [AS-026], do you agree that the residual effect on habitats would be moderate beneficial (significant)?	
5.40	Applicant	**Impact of testing and commissioning on water quality** ES Chapter 8 para 4.1.142 [AS-026] states that *Following completion of the outfall there would be a testing and commissioning phase for the proposed WWTP. This will include a short period of up to 6 months when both the existing and proposed outfalls are operating. This may result in short term intermittent reduction in water quality within the reach to Baits Bite Lock*. Please provide further information on the potential short-term reduction in water quality, whether this is considered to be significant and what impact this could have on protected fish species. Please give further information on how this could be mitigated.	The Applicant has provided an assessment regarding the testing and commissioning in paragraphs 4.1.190 to 4.1.199 in ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**]. This assessment includes consideration of when the population equivalent increases, a small increase in effluent discharges (and dry weather flow) may occur between the period in which the current consent conditions apply, and the end of the transfer period. This could increase the theoretical effluent load; however, it is assessed as only marginally affecting the downstream water quality, and is improving upon existing quality. The overall improvement in water quality in the River Cam means that the effect is considered to be moderate beneficial and significant. As the water quality is improving, there is unlikely to be any adverse effects on protected fish species, and no further mitigation is necessary.
5.41	WTBCN, CCoC, CCC, SCDC	**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?	
5.42	Applicant	**Mitigation** In ES Chapter 8 [AS-026] there are a number of instances where the Applicant proposes mitigation measures *if feasible or if possible* (e.g. para 4.2.236 *if feasible, suitable habitat for breeding birds, including hedgerows, will be cleared between October and mid-February (outside of the breeding bird season)).* a) What would be the impacts of construction if these measures are deemed not feasible at the time? If the mitigation measures are not feasible, does this impact on the conclusions within the ES regarding significance of effects? b) What other mitigation / solutions are proposed to ensure protection of the relevant species / habitats? c) Where parameters are secured through the terms of the CoCP - please explain how the design envelope assessed in the ES would be committed to where measures being employed are described as 'where feasible' or 'if possible' as this flexibility is not contained in the ES? Please provide details of where the parameters and assumptions in the biodiversity assessment are secured within the dDCO in each case?	The Applicant will amend ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**] to provide clarity and detail, where necessary for suitable and appropriate alternatives. These amendments are for: • Paragraph 4.2.85 – to add "Where this is not possible, lighting will be erected so that the spill does not cover the full width of the watercourse, and there is a navigable section remaining unlit above existing light levels." This will be secured via amended text in the Lighting Design Strategy (Appendix 2.5 App Doc Ref 5.4.2.5 [**APP-072**]) secured through a requirement in the draft DCO (App Doc Ref 2.1) [**AS-139**]; • Paragraph 4.2.248 – to remove "Where possible"; • Table 5-1 in relation to the construction of the proposed WWTP, and temporary and permanent removal of ditch habitat – to remove "where possible" (two instances); • Table 5-1 in relation to direct and indirect impacts on fish – to remove "where possible"; • Table 5-3 in relation to the construction of the proposed WWTP, and temporary and permanent removal of ditch habitat – to remove "where possible"; • Table 5-3 in relation to direct and indirect impacts on fish – to remove "where possible"; and • Table 5-3 in relation to direct and indirect impacts to badger – to remove "where possible". • In relation to Paragraph 4.2.236 (breeding birds), the Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [**APP-068**], paragraphs 7.2.17 to 7.2.21 provide measures where it is not feasible for clearance to occur outside of the breeding season. These measures will mitigate impacts on breeding birds. Requirement 8 of the draft DCO (App Doc Ref 2.1) [**AS-139**] secures compliance with the Code of Construction Practice. These amendments will be made for submission at Deadline 2 for reasons explained in the answer to ExQ1 5.4.
5.43	Applicant	**Replacement of hedgerow**	

ExQ1	Question to	Question	Response
		ES Chapter 8 [AS-026] confirms at para 4.2.325 that there would be a small area of habitat loss expected near to the Milton Road Hedgerows City Wildlife Site where there would be a need to remove a small section of hedgerow for access/construction works to the existing WWTP. Please confirm whether it is intended to replace the hedgerow following completion of works at the existing WWTP, noting that there is a presumption in NPSWW that habitats will, where practicable, be restored after construction works have finished.	The Applicant notes that paragraph 4.2.328 of ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**] states that "replanting of native species will allow enhancement and also continued ecological functionality of the hedge in the longer term. This will support the integrity of the CiWS." It is therefore intended to replace any losses of hedgerow at this location.
5.44	Applicant	**Impact on hedgerow and ditches** ES Chapter 2 [APP-034] notes that the working width for pipeline crossings of ditches and hedgerows during construction would be 'approximately 6m' wide. ES Chapter 8 [AS-026] however assesses 'up to 6m' as the maximum for the purposes of the assessment but the CoCP Part B [AS-161] only refers to reducing hedgerow removal 'where feasible'. Please confirm that the maximum working with would be committed to by supplying details and / or cross sections to demonstrate how it would be achieved? How and where it would be secured?	The pipelines required for the Proposed Development are of varying sizes. Accordingly, the working widths for individual hedgerow crossings will vary. ES Chapter 2 (App Doc Ref 5.2.2) [APP-034] paragraph 2.8.18, refers to the Waterbeach pipeline which, for the majority of the route comprises two 500mm diameter pipes to be installed within a trench. This will require a working width of 'approximately 6m'. There may be opportunity for this to be narrower but as a worst case 6m has been assessed. ES Chapter 8 (App Doc Ref 5.2.8) [AS-026] therefore refers to a worst case need of 'up to 6m' width for these hedgerow crossings. The exception of the 6m limit is associated with the Final effluent (FE) and storm pipeline, which has a working width of up to 25m. Row 5 within Table 2-8 within the ES Chapter 8 (App Doc Ref 5.2.8) [AS-026] will be corrected to include reference to the crossing at Horningsea Road. This does not affect assessments as habitat loss as considered within BNG calculations had assumed complete clearance of areas temporarily required for construction. This will be provided within the ES Chapter 8 update provided at Deadline 2. Chapter 8 will be updated at Deadline 2 for reasons explained in the answer to ExQ1 5.4. The final corridor pipeline construction widths will be secured via the detailed design requirement and the finalised hedgerow removals will be set out with the detailed construction environment management plans (CEMP) (secured by Requirement 9 of the dDCO).
	Applicant	**Design of the discharge point and permitting** Has the design of the discharge point been discussed with the relevant consultation bodies? What progress has been made on design of the outfall to mitigate effects of scouring? Please provide an update on progress with the Environmental Permit(s) for the construction and operation of the outfall to the River Cam.	The Applicant has consulted with the Environment Agency, Natural England, the Internal Drainage Board, the Cam Conservators and representatives from the local authority in relation to the outfall design. The Environment Agency are the statutory body consulted in relation to the permitting requirements for the outfall and have been consulted directly. **Scour:** The outfall structure size and river bank protection requirements have been informed using a detailed hydraulic model, ES Appendix 20.7 Outfall CFD Report (App Doc Ref 5.4.20.7) [**APP-157**], which has been used to inform the engineering requirements to distribute the flow to the river, to control scour of the riverbed and erosion of the river bank either side of the outfall. **Environmental Permit:** The permitting discussions with the Environment Agency are still in progress. As part of this exercise the Environment Agency have recently requested that further work is undertaken to inform the Flood Risk Assessment. This is being done and the amended Flood Risk Assessment which will inform the Flood Risk Activity permit is due to be shared with the Environment Agency at Deadline 3 with the amended FRA submitted at Deadline 4.
5.46	EA	**Computer modelling of storm discharges and normal river flow** ES Chapter 8 [AS-026] suggests that further Computational Fluid Dynamics modelling of the impact of maximum storm discharges and normal river flow conditions on the riverbank are required in order to inform final outfall design (in relation to the impacts of scour on the River Cam CWS). Do you consider that additional modelling could be secured through the dDCO, or whether this should be provided during Examination for consideration?	
5.47	EA	**Control of effluent load and water quality** ES Chapter 8 para 4.3.29 [AS-026] states that *the environmental permitting framework will ensure that the effluent load (including agents added to reduce nitrate and phosphate load) being discharged to the River Cam from the proposed WWTP would never exceed the effluent load under currently consented limits for the existing WWTP. There will also be a reduction in storm water*	

ExQ1	Question to	Question	Response
		discharges from the proposed WWTP. Therefore, there would be no additional water quality impacts on these sites once the proposed WWTP is operating and hence no further impacts on biodiversity. a) Please confirm that the permitting framework would be able to control the effluent load in the manner purported by the Applicant and whether you agree with the Applicant's conclusions regarding impacts on water quality? b) Given that the Applicant asserts that the quality of the effluent load would be no worse than the existing arrangements at the existing WWTP, to what extent can this be considered a benefit?	
5.48	Applicant	**Effects - aquatic habitats** ES Chapter 8 [AS-026] concludes that with mitigation, there would be no likely significant effects on biodiversity receptors. However, with regard to the impact on and removal of aquatic habitats during construction, there would be a residual significant adverse effect – please therefore justify the conclusion that there are no likely significant effects on biodiversity receptors. Are further compensation measures possible to mitigate the harm?	The Applicant will update ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**] to provide clarity. Paragraph 4.2.72 currently states "…*The translocation and retention of reedbed habitat and any rare aquatic species will reduce the construction-phase effects from permanent moderate adverse and is significant*." With reference to paragraph 4.2.70 of ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**], where the residual effect on ditches due to their loss from the construction of the proposed WWTP is considered moderate adverse and significant, the creation of ditches within Works Plan 39 (and as outlined within the BNG report ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) **[AS-163]**) will compensate for this habitat type. The Applicant will update ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**] to reflect this detail and make the textual change so that it is clear that there is no residual significant effect. This update will be provided for Deadline 2 for reasons explained in the answer to ExQ1 5.4.
5.49	Applicant	**Determination of construction widths** Please demonstrate how the construction widths have been determined with regard to ecological impacts and demonstrate that they are the minimum necessary for the Proposed Development; for example the construction width is up to 30m for the Waterbeach pipeline whereas the construction width for the treated effluent pipeline is up to 50m.	The construction widths have been determined by the Applicant's experience of installing pipelines as part of its function as a water and waste water statutory undertaker (see Statement of Reasons (App Doc Ref 3.1) [**AS-143**]. The widths required are driven by a number of factors including, but not limited to, the following. • The size of the pipe(s) • The number of pipes to be laid • The ground conditions • Constraints, including ecology In all cases, the Applicant has sought to minimise the construction widths, thereby reducing the area to be occupied temporarily and the impact on the landowner and/or occupier. The construction corridor for the treated (final) effluent pipeline is up to 50m because the size of the final effluent pipes is such that a larger area is required to install those pipelines because of factors such as additional spoil to be handled and a larger area required for vehicle movements. Ecological receptors have been considered (please also refer to the Applicant's response to ExQ 5.44), in order to minimise impacts to any sensitive features. This includes consideration of trees and hedgerows by micro-siting, using existing gaps or weak points in hedgerows and reducing working areas (paragraphs 7.2.25, 7.2.44, 7.2.52, 7.2.62 Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [**APP-068**]).
5.50	Applicant	**Loss and disturbance of habitats** Please demonstrate how the loss or disturbance of habitats is the minimum required to facilitate the Proposed Development, notably in relation to the permanent loss of up to 70m habitat along the River Cam and temporary disturbance of 25m of ditch habitat.	**Temporary disturbance of ditch habitat parallel to the River Cam:** The 25m length of ditch identified as being disturbed relates to the extent required for the installation of the Final Effluent and storm pipelines. The extent represents the worst case extent affected, and takes into account the size of each pipe and the space needed to safely install them. A layout is indicated in drawing 9817 [APP-027] with a plan view of the ditch crossing by the 1.5m Internal Diameter (ID) final effluent pipe and the 1.8m ID storm pipeline. These pipes diverge slightly at the approach to connecting to the outfall chamber. Drawing 9805 [APP-02] shows a cross section through the ditch, showing the crossing depth as approximately 4m. The space required for installation also takes into account temporary works to divert the flow of water in the ditch and provides mitigation against water ingress. The latter would require excavations and protection works along the ditch crossing. The extents therefore have been designed to minimise insofar as is possible the extents disturbed. It is noted that the detailed method statement for these works would submitted with final details of the ditch crossing as part of the Environmental Permit process which will take account of the requirement to work within the 25m length limit.

ExQ1	Question to	Question	Response
			Permanent loss of up to 70m of habitat along the River Cam: The extent referred to represents the worst case extent required for the installation of the permanent outfall and riverbank protection works. This considers the size of the outfall structure, the space needed to safely install it, and the extent of the river bank protection works either side of the permanent outfall structure. Drawing 9817 [APP-02] shows a plan of the outfall structure arrangement and river bank protection structures either side of the outfall. The structure size and river bank protection requirements have been informed using a detailed hydraulic model, Appendix 20.7 Outfall CFD Report, (App Doc Ref 5.4.20.7) [**APP-157**] which has been used to inform the engineering requirements to distribute the flow to the river, to control scour of the riverbed and erosion of the river bank either side of the outfall. These have been designed to provide the level of protection as informed by the model outcomes. Drawing 9806 [APP-157] demonstrates that the expected length of the outfall arrangement is less than 70m however 70m has been assessed to consider the space required for installation.
5.51	Applicant	**NPSWW** Regarding NPSWW Accordance Table [AS-130] - Biodiversity: a) please demonstrate how the Proposed Development has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests b) there is no consideration of the Proposed Development against para 4.5.12 (regional and local sites) of NPSWW and how the proposal would meet with the requirements of this policy – please update accordingly; c)there is a lack of reference to veteran trees under para 4.5.13 which are located within the proposed order limits – please update accordingly; d) please demonstrate how the Proposed Development would meet with the requirements of para 4.5.14 of NPSWW; e) please demonstrate how the Proposed Development has ensured that activities would be confined to the minimum areas required for the works in accordance with para 4.5.17 of NPSWW; f) please outline mitigation measures which have been agreed with NE and whether they have been granted or refused, or intend to grant or refuse, any relevant licences, including protected species mitigation licences not already covered within the ES.	a) The Applicant has undertaken ecological surveys to understand the baseline species and habitats present within appropriate buffers (please refer to Table 2-4 in ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**], for survey areas) of the Order Limits, and to inform design and measures to conserve and enhance biodiversity interests. The Applicant has developed the designs for the Landscape Masterplan (Figure 3.1 within ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**]) with stakeholders and consultee input, to best integrate measures that support biodiversity, as well as landscape and recreation. Use of measures such as directional drilling under highly sensitive ecological features (such as the River Cam and an area of coastal and floodplain grazing marsh); and retaining and reinstatement of habitats such as hedgerows and trees after construction works also conserved biodiversity within the Order Limits. b) The impacts of the Proposed Development have been considered in respect of regional and local biodiversity and geological interest. Table 3-3 of ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**] provides the sites which are considered further within the assessment, with Table 4-2 in ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**] providing an explanation of the assessment. The design of the Landscape Masterplan (Figure 3.1 within ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**]) complements the Cambridge Nature Network, providing a new mosaic of habitat components and extensions to stepping stones, corridors and core areas such as Quy Hall, Little Wilbraham Fen and Stow-cum-Quy Fen SSSI, as illustrated in Figure 3.8 of ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**]. The NPSWW Accordance Table (App Doc Ref 7.5.1) has been updated in respect of paragraph 4.5.12 and is being provided at Deadline 1. c) There are two veteran trees within the Order Limits (Figure 8.3 in ES Book of Figures Biodiversity (App Doc Ref 5.3.8) [**AS-050**]). This figure references that these will be impacted, however, as discussed with the Technical Working Group in a meeting on 5th September 2023, these will not be impacted by the Proposed Development. This is because the pipeline trench avoids the trees. The Applicant will update Figure 8.3 in ES Book of Figures Biodiversity (App Doc Ref 5.3.8) [**AS-050**] to reflect this detail. The NPSWW Accordance Table (App Doc Ref 7.5.1) [**AS-130**] has been updated in respect of paragraph 4.5.13 to note this and is being provided at Deadline 1. d) The Applicant has built-in beneficial biodiversity features as part of the design of the Proposed Development. These features include those which are outlined within ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**], such as provision of bee banks, bare soil scrapes, deadwood and brash piles, reptile hibernacula features, seasonal ponds, creation of new grasslands, species-rich hedgerows, scrub and woodland. The NPSWW Accordance Table (App Doc Ref 7.5.1) [**AS-130]** has been updated in respect of paragraph 4.5.14 to note this and is being provided at Deadline 1. e) The Applicant's response to ExQ1 11.2 sets out how the design seeks to minimise land take in the Green Belt and to minimize its visual impact. As described under the heading 'Optimising Land Take' (paragraph 6.3.1 DAS (App Doc Ref 7.6) [**AS-168**]), the masterplan has sought to minimise the total land take for the development. This includes minimising land required for development through efficient planning, and optimising the area around it to integrate the development into the countryside and best mitigate its impact on the landscape and Green Belt. In respect specifically of biodiversity mitigation consistent with NPSWW paragraphs 4.5.14 and 4.5.17, the Proposed Development incorporates a considerable body of measures to restore and expand existing habitats and to create new habitats as described in ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**]. Although the environmental assessment adopts a 'maximum design envelope' approach, the Applicant has sought to confine construction to the minimum areas

ExQ1	Question to	Question	Response
			required for the works as described at section 2.9 of ES Chapter 8 and as secured through the CoCP Part A, and as further detailed in the responses to ExQ1 5.33 and 5.42. The NPSWW Accordance Table (App Doc Ref 7.5.1) has been updated in respect of paragraph 4.5.17 to note this and is being provided at Deadline 1. f) As outlined in the response to ExQ1 5.15, the Applicant received a Letter of No Impediment (LONI) from Natural England issued on 25th January 2023 in relation to the ES Appendix 8.22 Water Vole Natural England Ghost Licence Method Statement (App Doc Ref 5.4.8.22) [**APP-107**]. The LONI provides points to be addressed prior to formal submission, post DCO consent. The points raised by Natural England will be amended/added to this formal submission post DCO consent. A second LONI issued by Natural England on the 14th June 2023 in relation to ES Appendix 8.20 Bat Natural England Ghost Licence Method Statement (App Doc Ref 5.4.8.20) [**APP-105**], which similarly includes points to be addressed prior to formal submission post DCO consent. The points raised by Natural England will be amended/added to this formal submission post DCO consent. The Applicant awaits confirmation of the third LONI from Natural England in relation to badgers (ES Appendix 8.21 Confidential Badger Ghost Licence Method Statement (App Doc Ref 5.4.8.21) [**APP-106**]). The mitigation measures provided within ES Appendix 8.22 Water Vole Natural England Ghost Licence Method Statement (App Doc Ref 5.4.8.22) [**APP-107**] include displacement activities at appropriate times (15th February and 15th April), ecological supervision and tool-box talk, and advanced habitat creation (water-holding ditch of 84m length). The mitigation measures provided within ES Appendix 8.20 Bat Natural England Ghost Licence Method Statement (App Doc Ref 5.4.8.20) [**APP-105**] include ecological supervision and tool-box talk, tree protection fencing, bat box installation and sensitive timing of works to avoid potential impacts on trees offering hibernation suitability. Mitigation measures provided in relation to badgers (ES Appendix 8.21 Confidential Badger Ghost Licence Method Statement (App Doc Ref 5.4.8.21) [**APP-106**]) include general measures such as safeguarding excavations from entrapment, safe storage of chemicals, tool-box talk, along with specific measures including either temporary or permanent closure of setts between 1st July and 30th November, using one-way badger gates and chain link fencing to prevent digging in, with monitoring and ecological supervision. Furthermore, any machinery used within 10m of a sett will be restricted to hand-held only.
5.52	Applicant	**Conformity of mitigation measures within ES Chapter 8 and the CoCP Part A** Some of the mitigation measures proposed within ES Chapter 8 [AS-026] do not wholly tie up with the mitigation measures contained within the CoCP Part A [APP-068]. For example, the mitigation measures detailed in para 4.2.286 of ES Chapter 8 regarding badgers do not wholly accord with the mitigation measures set out in para 7.2.31 of the CoCP Part A. Please review both of these documents carefully and update all areas where there are discrepancies of this nature across all biodiversity receptors.	The Applicant will update the documents ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**] and CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**] to remove discrepancies, with the CoCP Part A submitted at Deadline 1.
5.53	Applicant	**Mitigation** Para 4.2.51 of ES Chapter 8 [AS-026] states that *Other habitats will be reinstated on a site-specific basis, informed by detailed preconstruction surveys and will be set out within the CEMP (to be prepared by the contractor)* – please signpost to where this is secured.	The Applicant has provided General Mitigation Measures within the CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**] which states that: *7.2.6 A number of ecological commitments have been made in the ES (Chapter 8: Biodiversity, App Doc Ref 5.2.8). These will be incorporated into the CEMP(s) and the Principal Contractor(s) will be required to adhere to these during the construction process.* *7.2.8 Pre-commencement surveys will be undertaken within each works area (based upon the DCO Works Plans, App Doc Ref 4.3) to confirm the presence or absence of protected species. The timing of these will be appropriate for the species to which they relate and the phase during which the works will be undertaken. Further adjustments to construction techniques or the phasing of the works will be made if it is appropriate and feasible to do so following these surveys or any additional mitigation measures identified. All surveys will be undertaken sufficiently in advance of the works start time to enable any such mitigation to have been undertaken. Areas of habitat which could support protected species will be cleared sensitively in accordance with all relevance guidance.* *7.2.14 If protected species are found during construction, then works will cease in the immediate area and the Environmental Manager will attend site to manage the issue, with input from the ECoW as required. Works will only recommence at the direction of the Environmental Manager (as advised by the ECoW). This may require appropriate mitigation and compensation.* Therefore "Other habitats will be reinstated on a site-specific basis, informed by detailed pre-construction surveys and will be set out within the CEMP (to be prepared by the contractor)"

ExQ1	Question to	Question	Response
			Requirements 8 and 9 of the draft DCO (App Doc Ref 2.1) [**AS-139**] secures compliance with the Code of Construction Practice, and requires that a CEMP be submitted to (and approved by) the relevant planning authority, respectively.
5.54	Applicant	**Mitigation** Para 4.2.235 of ES Chapter 8 [AS-026] states *All hedgerows removed during construction will be reinstated* – please signpost to where this is secured for all parts of the Proposed Development.	The Applicant notes that paragraph 4.2.235 of ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**] relates to the construction of the Waterbeach transfer pipeline. The Applicant has provided measures in relation to Tree/Hedgerow Removal within the CoCP Part A (App Doc Ref 5.4.2.1) which states that: *7.2.68 Reinstatement planting will be undertaken in the first available planting season following construction. Species mixes will match or improve on the existing hedgerow. Hedgerow planting will be of native species of British origin and appropriate for the local area. Hedgerows will be enhanced with species rich planting where possible.* *7.2.69 Any planting as part of the Proposed Development which dies or becomes seriously damaged or diseased within five years after completion of construction will be replaced in the first available planting season with stock of the same species and size as that originally planted unless otherwise agreed with the Local Planning Authority.* The CoCP Part B (App Doc Ref 5.4.2.2) does include Site Specific Measures (Section 3.4) in relation to hedgerows along the Waterbeach Pipeline: *Hedgerow will be reinstated following completion of the works. Replacement tree planting on a like for like basis will carried out outside the zone of easement for the pipeline unless an alternative species is proposed due to disease risks or at the request of the landowner. Where tree and hedgerow removal is required, appropriate replanting will take place.* The CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**] Section 7.2 includes at 7.2.68 measures relating to reinstatement of planting. Requirement 8 secures compliance with the CoCP. Requirement 9 of the dDCO requires the preparation of a detailed CEMP (which would set out reinstatement details) and the detailed CEMP is to be approved by the local planning authority.
5.55	Applicant	**Mitigation** Para 3.2.10 of ES Chapter 8 [AS-026] states that *Water vole ditch network: changes in water levels to wetter winters and drier summers may affect the habitat within the water vole ditch network being created. Management of water levels alongside IDB water level management for optimal water vole habitat will be required to provide long-term habitat resources for water vole* – please signpost to where this is secured.	The Applicant will update paragraph 3.2.10 of ES Chapter 8: Biodiversity (App Doc Ref 5.2.8) [**AS-026**] with corrected information. This is because an IDB is not responsible for the area of land required for water vole ditch network creation at Works Plan 39. The corrected text will include that management will be required but that this responsibility will fall to the Applicant as the landowner. This will also be included within the detailed Outfall Management and Monitoring Plans for the construction and operation phases. This update will be provided for Deadline 2.
5.56	Applicant	**Mitigation** Please demonstrate where the mitigation commitments and parameters set out in ES Chapter 8 [AS-026] Table 2-10, are secured.	The Applicant outlines that the mitigation commitments and parameters set out in Table 2-10 are secured in Table 5-2 in ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**] and also within ES Chapter 2 Appendix 2.6 Mitigation Tracker (App Doc Ref 5.4.2.6) [**AS-055**].
5.57	Applicant	**Mitigation** Please provide details of how coastal and floodplain grazing marsh and fields supporting important arable flora would be reinstated following construction.	<u>*Flood plain grazing marsh*</u> The Applicant proposes to use directional drilling beneath the coastal and floodplain grazing marsh which will mean that the habitat is not degraded during construction and is retained in situ. Sheet 2 of the Design Plans – Waterbeach Pipeline Long Sections (App Doc Ref 4.14 [**AS-156**]) illustrates that the directional drilling is proposed for this location. <u>*Fields supporting important arable flora*</u> The General Mitigation Measures as outlined within the CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**] and as listed in response 5.53 state: *7.2.6 A number of ecological commitments have been made in the ES (Chapter 8: Biodiversity, App Doc Ref 5.2.8). These will be incorporated into the CEMP(s) and the Principal Contractor(s) will be required to adhere to these during the construction process.* *7.2.8 Pre-commencement surveys will be undertaken within each works area (based upon the DCO Works Plans, App Doc Ref 4.3) to confirm the presence or absence of protected species. The timing of these will be appropriate for the species to which they relate and the phase during which the works will be undertaken. Further adjustments to construction techniques or the phasing of the works will be made if it is appropriate and feasible to do so following these surveys or any additional mitigation measures identified. All surveys will be undertaken sufficiently in advance of the works start time to enable any such mitigation to have been undertaken. Areas of*

ExQ1	Question to	Question	Response
			habitat which could support protected species will be cleared sensitively in accordance with all relevance guidance. *7.2.14 If protected species are found during construction, then works will cease in the immediate area and the Environmental Manager will attend site to manage the issue, with input from the ECoW as required. Works will only recommence at the direction of the Environmental Manager (as advised by the ECoW). This may require appropriate mitigation and compensation.* These measures would allow any important arable flora to be appropriately managed, as noted in 5.1.8 in ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**] which states "translocation of rare floral species to suitable locations to provide a continued opportunity for the species found."
5.58	Applicant	**River crossings** ES Appendix 8.1 [APP-086] states that the Waterbeach pipeline would cross the River Cam by trenchless methods and ES Chapter 2 [APP-034] notes that this is shown on Sheet 11 of the works plans [AS-150]. The aquatic ecology assessment assumes there would be no impact on the river. Sheet 9 of the works plans, however, demonstrates two crossings of the River Cam by the pipeline. Please confirm whether both crossings are to be carried out by trenchless methods? If not, has the biodiversity assessment taken account of the possibility of an alternative crossing method?	The Applicant can confirm that both crossings will be carried out by trenchless methods. This is illustrated within Sheets 2 and 10 within the Design Plans Waterbeach Pipeline Long Sections (App Doc Ref 4.14) [**AS-156**].
5.59	EA	**Impact on Wicken Fen Ramsar / Fenland Special Area of Conservation** NE consider in its RR [RR-015] that there would be no likely significant effect on Wicken Fen Ramsar / Fenland Special Area of Conservation, subject to agreement from the EA – do you agree?	
Questions relating to Habitats Regulations Assessment (HRA)			
5.60	Applicant, NE	**To the Applicant:** ES Chapter 8, para 3.1.45 [AS-026] notes a cluster of records for barbastelle bat along the disused railway line. ES Appendix 8.7 [APP-092] concludes these records are within the foraging range of Eversden and Wimpole Woods Special Area of Conservation (SAC). The HRA Screening Report [AS-068] concludes that there is no ecological connectivity between the Proposed Development and the SAC. Please provide an explanation for the discrepancy in these conclusions. **To Natural England:** Please comment on the relevance of these findings in relation to your agreement to the conclusions of no Likely Significant Effects on the barbastelle feature of Eversden and Wimpole Woods SAC.	Eversden and Wimpole Woods SAC was screened out in ES Appendix 8.16 Habitats Regulations Assessment Report (App Doc Ref 5.4.8.16) [**AS-070**] based on the location of the proposed WWTP being on the other side of Cambridge to the SAC and a number of busy roads being present, leading to the conclusion that it was highly unlikely that there would be direct ecological connectivity between the SAC and the Ecological Zone of Influence (EZoI). Paragraph 3.1.45 of ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [**AS-026**] noted a cluster of records for barbastelle along the disused railway line and ES Appendix 8.7 Bat Technical Appendix (App Doc Ref 5.4.8.7) [**APP-092**] concluded that these records are within the foraging range of Eversden and Wimpole Woods SAC, however, it is unknown whether these barbastelle form part of the SAC population or are a discrete cluster in isolation. In light of these discrepancies, and with precaution in mind, the Applicant will update the HRA Screening Report (App Doc Ref 5.4.8.15) [**AS-068**] to reflect that Eversden and Wimpole Woods SAC is screened in, and will be taken through to the Appropriate Assessment stage within ES Appendix 8.16 Habitats Regulations Assessment Report (App Doc Ref 5.4.8.16) [**AS-070**]. This update will be provided for Deadline 2.
5.61	The Applicant	Please provide corrections to the HRA Screening Report [AS-068] and HRA Report [AS-070] to address discrepancies noted between the distances of the Devil's Dyke SAC site from the Proposed Development provided in the two reports.	The Applicant has checked the distance of Devil's Dyke SAC from the Proposed Development for discrepancies between ES Appendix 8.15 HRA Screening Report (App Doc Ref 5.4.8.15) [**AS-068**] and ES Appendix 8.16 Habitats Regulations Assessment Report (App Doc Ref 5.4.8.16) [**AS-070**] and both were found to align, with a distance of 8.97 km recorded. In light of this, the Applicant also checked that the distances from the Proposed Development align for all other sites in case Devil's Dyke SAC had been recorded in error. ES Appendix 8.15 HRA Screening Report (App Doc Ref 5.4.8.15) [**AS-068**] states that the distance of the Wash and North Norfolk Coast SAC, Wash SPA and Wash Ramsar site are 59.57 km from the Proposed Development, however, ES Appendix 8.16 Habitats Regulations Assessment Report (App Doc Ref 5.4.8.16) [**AS-070**] states that these designated sites are 70.3 km from the Proposed Development. The Applicant has checked the distance and 70.3 km is the accurate figure. The Applicant will update ES Appendix 8.15 HRA Screening Report (App Doc Ref 5.4.8.15) [**AS-068**] to align the stated distance in both documents. This update will be provided for Deadline 2.
5.62	NE	The Applicant has provided an updated HRA Screening Report [AS-068] and HRA Report [AS-070]. Please confirm whether the comments raised in your RR [RR-015] are maintained in light of this?	

6. Carbon emissions and climate change mitigation and adaptation

ExQ1	Question to	Question	Response
6.1	Applicant	**Drafting error**	The Applicant confirms that section 5.1 of ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] should confirm the whole life impact (including sequestration) of the Preferred Option is -35,380 tCO2e; CHP 68,430 tCO2e.

ExQ1	Question to	Question	Response
		The figures for the proposed net zero carbon emissions for both the preferred option and CHP option are different in the summary and conclusion sections of ES Chapter 10: Carbon [APP-042] – please ensure that these are corrected throughout the document.	This error has been acknowledged and will be updated in ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**], alongside responses to Questions 6.3, 6.18, and 6.22 at Deadline 3. This allows time for other amendments to be made within the document, such as updates to the whole life assessment period to align with the operational design life.
6.2	Applicant	**National Adaption Programme 2023** To what extent does the publication of a new National Adaption Programme in July 2023 from DEFRA affect the Proposed Development and the findings on climate change adaption measures contained within the ES? Is this likely to result in improved climate change mitigation measures through the regulatory processes which could affect the Proposed Development?	The Third National Adaptation Programme (NAP) was published in July 2023, after the publication date of ES Chapter 9: Climate Resilience (App Doc Ref 5.2.9) [**APP-041**]. However, the requirements of the NAP for Water (section 2.2 of the NAP) do not change the findings of the climate change impact assessment and adaptation measures in the ES, for the reasons set out below. Section 2.2 of the NAP requires water companies to follow the National Flood and Coastal Erosion Risk Management (FCERM) Strategy for England, which includes an objective for water companies to develop plans between now and 2030 for their infrastructure to be resilient to flooding and coastal change. Fluvial flood risk is assessed within the Flood Risk Assessment (FRA) (App Doc Ref 5.4.20.1) [**APP-151**] and the results have been reported in ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**). A 20% uplift factor for climate change (1%AEP + 20%) has been applied within the fluvial flood risk assessment in the FRA. Mitigation measures in the construction and operation periods are described in the FRA and are consistent with requirements of the NAP for water companies to develop plans for their infrastructure to be resilient to flooding.
6.3	Applicant	**NPSWW** Please demonstrate how the Proposed Development complies with bullet point 6 of para 2.2.3 of NPSWW.	Bullet point 6 of paragraph 2.2.3 is a summary of (somewhat dated) government policy objectives, not a planning policy compliance test. The NPSWW states that government policy is to "*help deliver the UK's obligation to reduce greenhouse gas emissions by 80% by 2050 and work to carbon budgets stemming from the Climate Change Act 2008".* As described in the Strategic Carbon Assessment and in ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**], carbon emissions from the Proposed Development are unlikely to materially affect compliance with these high level strategic objectives. This is referenced in Table 1-2 in ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**], but currently is not addressed in the conclusions/analysis. The Applicant will update ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] with assessment of the emissions reductions of the Proposed Development against the baseline assessment compared against emissions pathways of the Balanced Net Zero Pathway in the Sixth Carbon Budget by Deadline 3. The NPSWW Accordance Table (App Doc Ref 7.5.1) has been updated in respect of paragraph 2.2.3 to note this and is being provided at Deadline 1. Paragraph 2.2.3 of the NPSWW further states that the Government's key policy objectives around climate change mitigation and adaptation are to "*ensure that climate change adaptation is adequately included in waste water infrastructure planning*". This requirement is met through the completion of the climate change impact assessment and identification of resilience and adaptation measures that result in the significance of effects due to climate change being determined as not significant. The climate change impact assessment and identification of resilience and adaptation measures is reported in ES Chapter 9: Climate Resilience (App Doc Ref 5.2.9) [**APP-041**].
6.4	Applicant, SCDC	**South Cambridgeshire Local Plan** South Cambridgeshire Local Plan policy CC/4 requires that for non-residential development, an application must be accompanied by a water conservation strategy which demonstrates a minimum water efficiency standard equivalent to the BREEAM standard for 2 credits for water use levels unless demonstrated not practicable. Would it be practicable to provide this for the Proposed Development (such as for the office building / discovery centre / workshop) - why / why not? If practicable, could it be included as a requirement for the detailed design stage – if so, please suggest potential wording for the dDCO.	The applicant is seeking BREEAM excellent accreditation for the Discovery Centre (DAS 2.6.1) DAS [AS-168] therefore appropriate water conservation standards will be met. Potential wording for the dDCO will be presented by the Applicant in the next submitted draft.
6.5	Applicant, CCoC	**Clarification of information – [RR-001]** CCoC's RR [RR-001] seeks clarification regarding ES Appendix 10.1 GHG Calculations [APP-109] – please liaise with one another to establish what clarification is required and suitably address this matter.	The Applicant will liaise with CCoC in relation to this clarification as part of the engagement on the Statement of Common Ground in order that CCoC can complete their review of ES Appendix 10.1 GHG Calculations (App Doc Ref 5.4.10.1) [**APP-109**].
6.6	Applicant	**NPSWW** Please explain how the ES demonstrates that there would be no critical features of the Proposed Development which might be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections in accordance with NPSWW para 3.6.10?	ES Chapter 9: Climate Resilience (App Doc Ref 5.2.9) [**APP-041**] uses a worst-case climate scenario from the latest climate set of projection data from the Met Office for the assessment of the impacts of climate change on

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			the Proposed Development. This worst-case scenario has been applied uniformly to assets and processes of the Proposed Development, including critical features. To identify the maximum climate parameters to use in the assessment, projections for highest emission scenario (RCP8.5) from the UKCP18 projections were used. The 90th percentile values from the UKCP18 probabilistic projections and the UKCP18 modelled maximum rainfall and temperatures from were used for precipitation-related and high-temperature impacts in the 2090s. The 10th percentile values from the UKCP18 probabilistic projections for drought-related impacts in the 2090s. The use of this data is detailed in ES Chapter 9: Climate Resilience (App Doc Ref 5.2.9) [**APP-041**], with the data outlined in Section 3.3 (page 46). Data on more radical changes in sea level (the High++ scenario outlined in UKCP09) were not used as the site is located inland and will not be affected by sea level change outlined in these scenarios. The NPSWW Accordance Table (App Doc Ref 7.5.1) [**AS-130]** has been updated in respect of paragraph 3.6.10 to reflect the above and is being provided at Deadline 1.
6.7	Applicant	**UK Climate Change Risk Assessment 2022** ES Chapter 9: Climate resilience [APP-041] is informed by the second UK Climate Change Risk Assessment (DEFRA, 2017). Para 3.6.11 of NPSWW requires that adaption measures should be based on the Government's latest national Climate Change Risk Assessment, and a more up-to-date version was published in January 2022. Why was the 2022 Risk Assessment not utilised to inform the ES and how does this more recent Risk Assessment affect proposed adaption measures and findings of the ES?	ES Chapter 9: Climate Resilience (App Doc Ref 5.2.9) [**APP-041**] has been informed by the third UK Climate Change Risk Assessment (CCRA) (see paragraph 1.4.3). The reference to the second UK CCRA in the reference list is an error and should state the third UK CCRA. The third UK CCRA is referenced as part of relevant National Legislation in Section 1.4.3 (page 7). This error has been acknowledged in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1. The NPSWW Accordance Table (App Doc Ref 7.5.1) has been updated in respect of paragraph 3.6.11 to note this and is being provided at Deadline 1.
6.8	Applicant	**Effects - GHG emissions** The IEMA Environmental Impact Assessment Guidance to Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022), which has been used to assess the impacts of the Proposed Development on carbon emissions, states that *...in the absence of any significance criteria or defined threshold, it might be considered that all GHG emissions are significant...* Please therefore justify how the significance table 2-1 within ES Chapter 10 [APP-042] has therefore been derived.	The IEMA guidance published in 2022 confirms an update to the assessment process. The IEMA 2022 guidance states that it presents 'more nuanced' levels of significance. Whilst the 2017 version of the IEMA guidance stated that "…in the absence of any significance criteria or defined threshold, it might be considered that all GHG emissions are significant…", the IEMA 2022 guidance says that while IEMA's position (or the science) that all emissions contribute to climate change has not changed, the IEMA 2022 guidance now provides relative significance descriptions to assist assessments. Table 2-1 in ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] has set out significance criteria based on section 6 (page 25) of the IEMA 2022 guidance.
6.9	Applicant	**Impacts on carbon from land use change** Please justify the conclusion in para 4.3.6 of ES Chapter 10 [APP-042] that the impacts on carbon from land use change would be moderate adverse and not significant? To what extent can the Applicant ensure that the deciduous woodland would ensure overall net carbon benefits on land use from year 11 of planting?	Paragraph 4.3.6 of ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] states that the impact is minor adverse and therefore not significant, in line with the criteria set in Table 2-1 of ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**]. This assessment draws on the requirement that the Landscape, Ecological and Recreational Management Plan (LERMP) (App Doc Ref 5.4.8.14) [**AS-066**] is implemented and that the woodland is maintained in accordance with the 30 year Biodiversity Net Gain requirements, so that the trees will be established by year 11. ES Appendix 10.2 Outline Carbon Management Plan (App Doc Ref 5.4.10.2) [**AS-076**] will drive carbon reduction in operation and track overall operational emissions against the Applicant's target that the project remains operationally net zero, this may be from a number of carbon reduction measures.
6.10	Applicant	**Baseline carbon emissions** Regarding the baseline for carbon emissions (which uses a pre-value-engineered early view of how the existing WWTP would likely have been re-built through conventional processes and approaches) set out in ES Chapter 10 [APP-042]: a) Please confirm whether this baseline considers rebuilding the WWTP at the proposed or existing WWTP site?	a) The construction baseline used in ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] considers rebuilding the WWTP at the proposed WWTP site. b) The DM0 baseline referred to in ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] is a 2010 baseline. This approach has been used as it is in line with the Applicant's reporting approach on capital carbon emissions reductions. This is to provide a consistent position across their portfolios, so that any claimed reductions are from a fixed baseline. The Applicant has an accredited PAS2080 approach to managing and reducing carbon in the built environment, which focuses on reducing emissions against a baseline

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		b) Please confirm if the DM0 baseline is for the present day (rather than a 2010 baseline which is referred to a number of times within the ES – if a 2010 baseline was used, please justify this approach)? c) Please explain why a baseline which assumes the WWTP would be rebuilt was used as opposed to a baseline of the current operation of the existing site, given that in the event that this application for a DCO is not granted, and no other planning application to relocate the existing WWTP is successful, the WWTP would remain at the existing site. The ExA draws the Applicant's attention to the IEMA Environmental Impact Assessment Guidance to Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022) which states that baseline emissions should be considered as the existing emissions from the project boundary prior to the construction and operation of the project.	position. The importance of the baseline is in identifying key hotspots and taking actions to reduce emissions which has been done through the Risk Opportunities Value (ROV) design process. c) The approach to the baseline in ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] was based on IEMA's 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' guidance issued in February 2022. Page 7 of the IEMA 2022 guidance states that the baseline can be in the form of either "a) GHG emissions within the agreed physical and temporal boundary of a project but without the proposed project or b) GHG emissions arising from an alternative project design and assumptions". The Applicant selected b) as their baseline because an alternative baseline of a do nothing or upgrading the existing WWTP would not deliver the strategic outcome of freeing the existing sites for homes. The carbon benefit of the relocation from the existing site is covered in the Strategic Whole Life Carbon Assessment. This choice of an alternative design baseline also enables identification of key hotspots through their Risk Opportunities Value (ROV) design process that takes actions to improve the design to reduce emissions.
6.11	CCC, CCoC, SCDC	**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)?	
6.12	Applicant	**Alternative emissions – optimisation of the existing WWTP** The IEMA Environmental Impact Assessment Guidance to Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022) suggests reporting on the Alternative Emissions (including future baseline emissions should the project be developed) – please provide detailed information on the scenario of the existing WWTP (and/or with upgrades to the Waterbeach Water Recycling Centre) being optimised for carbon where the works are upgraded at the existing site to serve the projected population equivalent from the same geographical areas, with the improved treatment standards proposed and the gas to grid export developed (if this is possible at the existing site). The ExA seeks to understand how retention of the existing site(s) with upgrades compares to the Proposed Development.	The approach to the baseline in ES Chapter 10: Carbon (App Doc Ref 5.2.10) [APP-042] was based on IEMA's 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' guidance issued in February 2022. Page 7 of the IEMA 2022 guidance states that the baseline can be in the form of either "a) GHG emissions within the agreed physical and temporal boundary of a project but without the proposed project or b) GHG emissions arising from an alternative project design and assumptions". Alongside the Strategic Carbon Assessment, which sets out the carbon benefits of moving from the current site, the ES has presented a baseline of an alternative project design aligned to option B) in the IEMA guidance aligned to a like-for-like rebuild of the existing WRC design. Whilst an alternative baseline could be presented highlighting the impact of upgrading the existing WWTP and/or Waterbeach WRC, neither of these would achieve the outcomes laid out in the Strategic Carbon Assessment, as they would require redevelopment of homes elsewhere, and therefore, were not considered appropriate baseline/s by the Applicant for the ES. However, the Applicant within the Strategic Carbon Assessment (App Doc Ref 7.5.2) **[APP-206]**, has provided a counterfactual assessment of emissions to retain and upgrade the site, which shows this would be 74% lower emissions than the Proposed Development when considered in isolation. However, as stated in the Strategic Carbon Assessment, there are wider emissions impacts and benefits to be considered beyond the WWTP development alone.
6.13	Applicant	**Existing WWTP - CHP** Does the existing WWTP have an on-site CHP which uses biogas generated by sludge treatment?	Yes, the existing Cambridge WWTP has an on-site CHP. All compliant biogas produced by the Sludge Treatment Centre is used in the existing on-site CHP to produce green electricity to power the existing WWTP.
6.14	Applicant	**Operational phase carbon impacts** Para 4.4.4 of ES Chapter 10 [APP-042] does not appear consider the impacts of the Proposed Development from the operational phase from a worst-case scenario basis i.e. use of CHP. The CHP option appears to be modelled on the DM0 with a basic scheme only, but not with the Proposed Development. Please confirm the impacts of the CHP option and the Proposed Development, the significance of impact and residual effects.	Paragraph 4.4.1 of ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] sets out that the utilisation of biogas in CHP engines is the same approach taken for the operational emissions of the baseline (DM0). DM0 is a worse case as operational efficiencies have been identified that would likely make it lower carbon for the proposed development with CHP. Table 4-4 of ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] will be updated to clarify the approach taken for the CHP option is the same model as the baseline. This need for clarification has been acknowledged and will be updated in ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**], alongside responses to Questions 6.3, 6.18, and 6.22 at Deadline 3. This allows time for other amendments to be made within the document, such as updates to the whole life assessment period to align with the operational design life.

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6.15	Applicant	**Decommissioning carbon impacts** Table 4-7 of ES Chapter 10 [APP-042] considers the potential emissions from decommissioning, which focuses on transportation impacts, which are described as *the main activity*. What other activities could generate carbon impacts (e.g. use of electricity to power equipment to carry out this work, waste disposal)? If there are others, please demonstrate how these are considered within the ES.	Decommissioning involves limited activities to drain down and render safe the existing structure and has a limited impact, it does not include any demolition activities. The Applicant's review of decommissioning activities highlighted that emissions-generating activities were from fuel use in either on-site or off-site transport. The estimated emissions from decommissioning assumed a worse case position by assuming diesel power for these transport activities, which in the future may be electrified and therefore have lower carbon impact. Initial assessment highlights that the scale of emissions associated with decommissioning is below 1% of the Proposed Development footprint as currently modelled, see response to 6.16. This shows that decommissioning does not significantly change the estimated carbon footprint of the assessment.
6.16	Applicant	**Effects - decommissioning** Please justify the conclusion in para 4.5.6 of ES Chapter 10 [APP-042] that the decommissioning effects would not be significant, in the context that the relevant guidance states that it might be considered that all GHG emissions are significant, noting that there would be 13 tCO2e produced during this stage.	ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] was based on IEMA's 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' guidance issued in February 2022. This presents an updated assessment process to that described in this question. The IEMA 2022 guidance states that it presents 'more nuanced' levels of significance. While the previous 2017 version of the guidance stated that "…in the absence of any significance criteria or defined threshold, it might be considered that all GHG emissions are significant…", the IEMA 2022 guidance says that while IEMA's position (or the science) that all emissions contribute to climate change has not changed, the IEMA 2022 guidance now provides relative significance descriptions to assist assessments. Table 2-1 in ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] has set out in significance criteria based on section 6 (page 25) of the IEMA 2022 guidance. The IEMA 2022 guidance also confirms: "Activities that do not significantly change the result of the assessment can be excluded where expected emissions are less than 1% of total emissions, and where all such exclusions total a maximum of 5% of total emissions". Emissions from decommissioning are estimated at 13 tCO2e, which is ~0.03% of construction emissions (as stated in paragraph 4.5.6 of ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**]). This percentage contribution falls far below the 1% exclusions threshold in the IEMA 2022 guidance, however emissions have been reported for decommissioning to provide a sense of scale. This shows that decommissioning does not significantly change the estimated carbon footprint of the assessment.
6.17	Applicant	**Clarification of information** What do the 'addition items' in Table 4-1 of ES Chapter 10 [APP-042] refer to and why are they not included in the dDCO design?	The additional items referred to in Table 4-1 of ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] are ancillary items (e.g. interconnecting pipe work, flow meters, sumps, and manholes). For the DM0 carbon model, at this relatively early stage of design these items were not allocated to any specific part of the site. In the ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**], these items are still included in the footprint, but are allocated to specific site areas and so do not appear under the separate line item of 'additional items' in Table 4-1.
6.18	Applicant	**Whole life carbon assessment - ES Chapter 10 [APP-042]** a) Please confirm which years the whole life carbon assessment considers - the text in section 4.6 page 41 states the whole life carbon assessment is up to 2057 based on a 30 year operation period, while the title of Table 4-8 on page 42 suggests figures presented in Table 4-8 are until 2080. b) Please justify why is the whole life carbon assessment been taken up to 2057/2080 (see above question) and not to 2090s as this is the designed operational life of the Proposed Development? c) SCDC state [RR-004] that whilst there are no plans to decommission or demolish the Proposed Development at present, this should be factored into the whole life carbon assessment. The ExA appreciate that whilst the Applicant has no current plans to decommission the Proposed Development, it nevertheless would be decommissioned one day. On this basis, in order to form a "whole life" assessment, should the decommissioning of	a) The Applicant acknowledges a typo in the Table 4-8 title in ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**]. The Applicant will also update the whole life carbon assessment in ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] to cover a whole life assessment period to 2090 in alignment to the operational design life of the Proposed Development. b) The Applicant confirms the assessment in ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] will be extended in line with the design operational life to 2090. c) Paragraph 2.9.8 of ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] states that decommissioning and demolition of the Proposed Development has not been quantified. This is because future forecasts of emissions are subject to broad assumptions and a high degree of uncertainty. The Applicant considers that the decommissioning of the Proposed Development would be in line with the decommissioning of the current site, which was estimated to be in the order of 13tCO_2e, equivalent to less than 1% of the scheme emissions and

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		the Proposed Development therefore not form part of this assessment? If not, please justify why not. d) SCDC [RR-004] suggest that the operational impacts should be assessed until the future baseline of 2090's to align with ES Chapter 9: Climate Resilience. Why was this not considered appropriate?	therefore are unlikely to be material. Especially, when considering that the designed operational life of the scheme is to 2090 where it is expected that decommissioning activities would be largely decarbonised. d) The Applicant confirms the assessment in ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] will be extended to 2090. The above updates to ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] will be made by Deadline 3 to allow time to extend the assessment period in the modelling.
6.19	Applicant	**Existing WWTP – operationally net zero** Could the existing WWTP (and / or the Waterbeach Water Recycling Centre) be made operationally net zero? Are there any legislative or other commitments which would require the existing site(s) to operate with net zero carbon emissions, and if so, within what time frame?	Yes, with additional investment and infrastructure (including offsite pipe connection to medium gas grid) adding to it, requiring gas to grid plant and solar installation, the existing WWTP could achieve operationally carbon net zero performance. The Waterbeach WRC would be more challenging as it does not produce biogas on site which is a significant lever in achieving operational net zero. This would require investment from the Applicants customers and sanctioned by OfWAT in its business plan that is currently being determined. Following final determination of the Applicants 2024 business plan a period of design, planning, procurement, construction, and commissioning will be required. The Water sector has committed to achieving net zero operational emissions by 2030 as a sector and the Applicant has committed to this at an organizational level. The commitment does not require each individual WRC to be operationally net zero but encourages the most efficient investment across its asset base to deliver the target. Therefore, there is no existing commitment or legislation that would require the existing site or Waterbeach WRC to be operationally net zero in the short or medium term, beyond the UK economy wide target of net zero emissions by 2050.
6.20	Applicant	**Energy consumption** Para 1.8.5. of ES Chapter 2 [APP-034] states that for the proposed WWTP it is envisaged that a Membrane Aerated Biofilm Reactor (MABR) configuration would be used to ensure low energy utilisation for maximum oxygen transfer but that other process options remain a potential. What other configurations could be used, and what impacts are these likely to have on energy consumption? Have other options with more energy consumption been assessed within the ES?	The Applicant has presented a reasonable worst case within ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] by assuming that operational energy consumption would be in line with a conventional Activated Sludge Plant (ASP). This is considered to be the highest energy consuming secondary treatment process under consideration and any other processes assessed are typically lower energy consumers, such as the MABR option. The applicant has presented a reasonable worst case within ES Chapter 10: Carbon (App Doc Ref 5.2.10) [APP-042]. The operational energy consumption would be in line with a conventional activated sludge secondary treatment plant (ASP), which is an alternative, comparable to MABR in effluent quality expectations. The differences (referred to in the question as 'other configurations') revolve around the method of oxygen transfer to the micro-organisms, simply referred to as aeration, and the quantity of it. The MABR membranes, current most efficient, offset some of the fine bubble diffused aeration (FBDA) system that would also be required. Should the MABR system not be used, more of the FBDA would be required. Consequently, the amount of energy consumed would increase in line with the amount of MABR replaced with FBDA. We confirm that options that would be comparable (up to no MABR included) have been assessed within the ES.
6.21	Applicant	**Carbon Management Plan** R21 of the dDCO [AS-139] requires the provision of a detailed Carbon Management Plan before the gas recovery plant is operated. a) Please explain why the operation of the gas recovery plant, rather than the first operation of the proposed WWTP would be the trigger for submission of the Plan, given that the proposed operational carbon neutrality of the proposed WWTP would not solely rely on the gas recovery plant and noting that ES Chapter 10 [APP-042] states that the Plan would need to be agreed prior to the operation of the proposed WWTP. b) What happens to gas if the rest of the site becomes operational prior to submission of the Carbon Management Plan? How is this assessed within the ES? c) How would carbon emissions during commissioning and operation be monitored prior to the use of gas recovery plant and mitigated to ensure carbon neutrality?	a) The Applicant is happy to commit to submitting the detailed Operational Carbon Management Plan before the first operation of the proposed WWTP. b) As per above, the Applicant is happy to submit the detailed Operational Carbon Management before the first operation of the proposed WWTP to mitigate this risk. It is standard industry practice and the Applicant's intention is to have the WWTP and the gas recovery plant operational at the same time. c) The Outline Operational Carbon Management Plan highlights that the Applicant will report emissions from the proposed WWTP, including the gas recovery plant, on an annual basis to confirm scale of offsets secured continue to allow the scheme to be operationally carbon neutral. The Applicant will update the dDCO in its next draft submissions to reflect the changes above.

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6.22	Applicant	**Carbon reduction targets** Para 3.3.1 of ES Chapter 10 [APP-042] states that the project adopts a construction reduction target of 70% less than the 2010 construction baseline. Does this target align with current carbon reduction Government objectives, given that the Climate Change Committee's Carbon Budget requires a reduction in emissions by 78%? To what extent can the Applicant provide assurances that a 70% reduction would be achieved at the detailed design stage (over the current 50% confirmed reductions) as stated within ES Chapter 10 when this does not appear to be controlled through the dDCO, and to this end, to what extent can benefits be offered to a 70% reduction in construction emissions?	The Climate Change Committee's Sixth Carbon Budget requires a reduction of 78% in UK territorial emissions from 1990 levels. This target is extremely difficult to translate into a project specific trajectory to demonstrate alignment and there is no guidance on how individual projects should do this. The Applicant will provide an update to ES Chapter 10 Carbon (App Doc Ref 5.2.10) [**APP-042**] to include its assessment of the Proposed Development's emissions against the 6th Carbon Budget by Deadline 3, by applying the expected emissions reductions trajectories of the manufacturing and construction sector and fuel supply to the baseline carbon assessment. This provides an approximation of what expected levels of emissions would need to be for the project to be considered aligned to the 6th Carbon Budget and shows the DCO design emissions are already below this trajectory when compared against the baseline assessment. The Applicant has set this ambitious target to drive the design of the most efficient WWTP feasible and has confidence in its ability to do so based on its previous track record. However, the Applicant acknowledges that there are no controls to it achieving an additional 20% reduction to meet its 70% target and therefore no benefits can be secured beyond the 50% reduction already identified.
6.23	Applicant	**Carbon Budget Delivery Plan 2023** Does the Proposed Development accord with Carbon Budget Delivery Plan March 2023, for example, in the use of Advanced Anaerobic Digestion for sludge treatment / alternative ammonia removal processes? Please demonstrate how this has been considered within the ES.	The Climate Change Committee's Sixth Carbon Budget requires a reduction of 78% in UK territorial emissions from 1990 levels. This target is extremely difficult to translate into a project specific trajectory to demonstrate alignment and there is no guidance on how individual projects should do this. The Applicant will provide an update to ES Chapter 10 Carbon (App Doc Ref 5.2.10) [**APP-042**] by Deadline 3, to include its assessment of the Proposed Development's emissions against the 6th Carbon Budget, by applying the expected emissions reductions trajectories of the manufacturing and construction sector and fuel supply to the baseline carbon assessment. This provides an approximation of what expected levels of emissions would need to be for the Proposed Development to be considered aligned to the 6th Carbon Budget and shows the DCO design emissions are already below this trajectory when compared against the baseline assessment. The Proposed Development already includes Advanced Anaerobic Digestion, and the ROV process has also considered alternative ammonia removal technologies but a final decision on process selection for these will be made during detailed design.
6.24	Applicant	**Effects of climate change on carbon emissions** Has ES Chapter 10 [APP-042] considered the impacts of climate change and the potential increased carbon emissions which may be generated, such as future fitting of cooling equipment to the digesters if required?	ES Chapter 9: Climate Resilience (App Doc Ref 5.2.9) [**APP-041**] considers the potential adaptation measures required for the design to be resilient to climate change, and identifies measures such as additional cooling of digesters with additional air flow or circulation, for which capacity has been allowed for in the design. While the potential need has been identified for these resilience measures, uncertainties remain around the timescales for their potential implementation, which will be dependent on the observed changes to climate conditions. Some of the measures potentially required may not be needed for several decades, and so uncertainty also remains over the technology that will be used and whether measures such as additional cooling will be incorporated into replacement of process plant at the end of its design life, or fitted part-way through the design life of process plant. Uncertainties also remain on whether more efficient future WWTW process technology will be available in future decades, or technology and equipment more suited to future operational temperature ranges. ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] is based on the Proposed Development as described in ES Chapter 2: Project Description (App Doc Ref 5.2.2) [**APP-034**], and does not consider potential future changes which would be subject to separate assessment and planning process. Further expansion beyond the DCO is dependent on numerous factors including, but not limited to: population change, legislative change, technological advancement, leak management within the catchment. However, ES Chapter 10 Carbon (App Doc Ref 5.2.10) [**APP-042**] has allowed for like for like Capital Replacements to assets over the operational design period, and the whole life carbon assessment in response to question 6.18 will be updated in the document to cover the operational design period by Deadline 3. The use of like-for-like carbon intensive replacements was chosen as a reasonable worse case, despite there being a clear

ExQ1	Question to	Question	Response
			drive to decarbonise products, materials, and assets over the coming decades. Therefore, the like-for-like replacement allowance within the whole life carbon assessment is expected to cover likely future resilience asset requirements when decarbonisation of these technologies is accounted for.
6.25	Applicant	**Future plant expansion** Has potential future expansion of the proposed WWTP been considered in ES Chapter 10 [APP-042]?	ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] is based on the Proposed Development as described in ES Chapter 2: Project Description (App Doc Ref 5.2.2) [**APP-034**], and does not consider potential future changes which would be subject to separate assessment and planning process. Further expansion beyond the DCO is dependent on numerous factors including, but not limited to: population change, legislative change, technological advancement, leak management within the catchment. It is therefore not reasonable to complete further estimates on unknown future expansion scenarios. The Proposed WWTP capacity has taken into account current expected population growth that aligns with the Greater Cambridge Local Plan (August 2021) up to 2041.
6.26	Applicant	**Mitigation** Please specify where the mitigation measures proposed in para 4.2.13 of ES Chapter 10 [APP-042] are secured – Table 5-2 suggests a requirement in the dDCO [AS-139] to update the carbon model though there is no reference to carbon modelling in the dDCO.	The Applicant acknowledges that there are no existing provisions to secure delivering the measures identified in para 4.2.13 of ES Chapter 10 [APP-042]. These are potential mitigations that are being reviewed further for their viability before being embedded into the design.
6.27	Applicant	**Mitigation** Please specify where the mitigation measures proposed in para 4.2.15 of ES Chapter 10 [APP-042] are secured – Table 5-2 suggests a requirement in the dDCO [AS-139] to require the Gateway building to achieve BREEAM 'Excellent', though there is no apparent reference to BREEAM standards in the dDCO.	The Applicant confirms it will update it will deliver BREAAM Excellent Standard for the Gateway Building. This will be secured in the next drafting of the dDCO.
6.28	Applicant	**BREEAM** Cambridge Local Plan 2018 requires that all new non-residential buildings are built to achieve BREEAM 'excellent'. Whilst ES Chapter 10 [APP-042] suggests that the Gateway building would meet this target, there is nothing to suggest that the proposed Workshop Building would achieve the same standard – please justify why this is the case.	The Applicant can confirm that the Workshop Building will also achieve BREEAM excellent standard. This will be secured in the next drafting of the dDCO
6.29	Applicant	**Operational carbon emissions** Please confirm whether the Waterbeach effluent pumping station has been included within the operational carbon emissions produced within ES Chapter 10 [APP-042]?	The Applicant confirms that the Waterbeach pumping station is not part of the DCO and has not been considered within the operational carbon emissions.
6.30	Applicant, National Grid, Cadent Gas Limited	**Capacity / ability of the gas network to accept biogas generated by the Proposed Development** The Applicant proposes that biogas generated by the Proposed Development would be exported to the UK gas grid. Please confirm whether the gas grid system in the Cambridgeshire catchment area would be capable of accepting biogas of the extent proposed? Is there any risk that transferring biogas to the gas grid would not be possible or cease within the future?	The Applicant can confirm that Cadent Gas Ltd assessed their intermediate pressure network capacity (gas) to accept the biomethane to be generated at the Proposed Development and made an offer to connect to Anglian Water for the export of up to 650scm/h on a 24 hour a day, 7 days a week basis throughout the year (ref CAD/UKD/DAS/277, dated Dec 2021). A risk that the gas network does not have capacity always remains. On a day-to-day capacity basis (typically in summer when heat demand is low), that risk is managed through using the gas holder on site to balance and store generated biogas. Should the capacity limitation situation carry on for a prolonged period, the gas will be wasted in a controlled and permit-regulated way via the waste gas burner on site. Other mitigation plans for longer restrictions include diverting imported sludges from CWWRTP to other STCs. However, should the capacity restrictions carry on for prolonged periods of time and the gas network not be able to honour the agreement to receive the biomethane, the Applicant will consider alternative investment to utilise the biogas/biomethane in a sensible way. Options could include liquifying or compressing the biomethane for export by tanker ('virtual pipeline') for use elsewhere, or using it as a vehicle fuel for refilling AWS sludge import vehicles. Technologies for converting biomethane to hydrogen are also being developed and may be technically viable and cost effective to use at the site in the longer term. Those prolonged capacity restriction situations are classed as unforeseen based on Cadent stating it has capacity to receive CWWTRP biomethane and thus not included in the EIA or DCO application.
6.31	Applicant	**Mitigation**	The Applicant has identified a series of measures that it plans to deliver through the CoCP Practice Part A (App Doc Ref 5.4.2.1) [**APP-068**], including and additional to the measures highlighted in paragraph 7.9.21.

ExQ1	Question to	Question	Response
		Para 7.9.21 of the CoCP Practice Part A [APP-068] requires the Principal Contractor to put in place measures to minimise energy consumption and carbon emissions during construction. How is this secured through the dDCO [AS-139], noting that R9 does not make reference to the provision of a management plan relating to energy consumption or carbon emissions?	Requirement 8(1) of the dDCO [AS-139] requires each phase to be undertaken in accordance with the Code of Construction Practice.
6.32	Applicant	**Strategic Carbon Assessment** To what extent has the significance of effects from the findings of the Strategic Carbon Assessment [APP-206] been considered as part of the ES?	The findings of the Strategic Carbon Assessment (App Doc Ref 7.5.2) [**APP-206]** have not been considered as part of the ES. It instead utilises information provided in the ES relating to the Proposed Development as one aspect of its assessment. The boundary and assessment of significance in the ES assessment is confined to the Proposed Development and the cumulative effects from committed development as identified in the Cumulative Effects chapter. The purpose of the Strategic Carbon Assessment was to provide a strategic high-level assessment comparing the carbon cost of the proposed development, i.e. the relocation of the WWTP and delivery of housing on the resulting brownfield site in North East Cambridge, to a reasonable counterfactual, i.e. upgrading the existing WWTP in-situ and delivering the houses elsewhere in Greater Cambridge. This was done in order to better understand the implications in the event that the DCO application is refused.
6.33	Applicant	**Strategic Carbon Assessment** The Strategic Carbon Assessment [APP-206] states that for the counterfactual model, operational carbon site consumption has been discounted because of the decarbonisation of the electricity grid in the future. However, this would not be until at least 2035 – has this been factored into the model?	The operational site consumption has been discounted by the HM Treasury's Green Book electricity emissions factors. The consumption-based grid average industrial factors were used for 2026 to 2079 – the grid factor gradually decreases over time as the grid decarbonises and is then assumed to be constant from 2050 (when the grid is anticipated to be fully decarbonised).
6.34	Applicant	**Strategic Carbon Assessment** Given that there is uncertainty regarding the operational energy use (i.e. use of biogas upgrading plant or CHP plant) and the future carbon environment, please can the Conservative and Optimistic scenarios of the CHP plant use under zero carbon policies and the biogas plant use under mid-point scenario be modelled and provided. This is requested for both the counterfactual scenario and Proposed Development.	The conservative and optimistic scenarios relate to the timeline of housing delivery: optimistic scenario involves all 8,350 homes being delivered in Period 1; and conservative scenario involves 3,900 homes being delivered in Period 1 and 4,450 homes being delivered in Period 2 (rate based on the Greater Cambridge Shared Planning Local Plan). This therefore has no impact on either the embodied or operational emissions of the WWTP site - they remain constant across both housing delivery scenarios.
6.35	Applicant	**Strategic Carbon Assessment** Save Honey Hill Group [RR-035 Section 9.2] suggest that the Strategic Carbon Assessment [APP-206] does not account for commuting, construction vehicle movements, housing development or demolition of the Proposed Development – please provide a response to this.	*Commuting* Commuting is one of the three main aspects that is assessed. The Greater Cambridge Shared Planning strategic spatial options appraisal modelling tool, which models the annual transport emissions for a range of location categories, was used to estimate operational emissions. The proposed development is categorised as an 'urban' settlement given that it would be located on a brownfield site located close to the City of Cambridge. The counterfactual is categorised as a 'public transport corridor' due likelihood that the suburban settlement would be linked to excellent public transport links, such as the Cambridgeshire Guided Busway and its adjoining cycleway. Embodied carbon (defined in the SCA as carbon emissions associated with materials and construction processes of the WWTW, housing development and vehicles) is also assessed using vehicles per household data for both Cambridge City as a proxy for the proposed North East Cambridge site, and Cambourne as a proxy for the counterfactual site. *Construction vehicle movements* The construction phase assessment for the proposed WWTP that Anglian Water undertook and was included in the SCA includes the following emissions sources: - Emissions associated with the manufacture of raw materials and construction products; - Transport of those materials to construction site; and - Construction effort emissions e.g. fuel use in construction. *Housing development*

ExQ1	Question to	Question	Response
			Housing is one of the three main aspects that is assessed. Embodied and operational carbon is assessed for both the proposed development in North East Cambridge and the counterfactual housing development, which is assumed to be a generic suburban settlement. Emissions are then calculated using Gross Internal Area (GIA) estimates and a range of Whole Life Carbon (WLC) and Energy Use Intensity (EUI) targets for housing and its supporting infrastructure, e.g. schools. *Demolition of the Proposed Development* Decommissioning of the existing Cambridge WWTP is quantified within this assessment. Decommissioning involves limited activities to drain down and render safe the existing structure and has a limited impact. Vehicle movements are the key source of emissions. Emissions from the demolition of the existing WWTP are not included in the Environmental Impact Assessment (EIA). It is not part of the scope of this proposal and that work will be done by the future developer and considered as part of a separate planning application. It is likely to include the effects of emissions from plant used in demolition, taking into account the re-use of materials including secondary aggregate, recovered steel and other equipment. Chapter 2 Project Description paragraph 1.4.7 states that consent is not sought under the Development Consent Order for the subsequent demolition or redevelopment of the Cowley Road site. However, the Applicant commits to undertake an assessment of the indicative scale of demolition emissions based on structure volumes and site area to be cleared on the existing site to demonstrate the likely scale of these emissions. These will be provided by Deadline 3 as part of an updated 7.5.2 Planning Statement Strategic Carbon Assessment (App Doc Ref 7.5.2) **[APP-206]**.
6.36	Applicant	**Strategic Carbon Assessment** To what extent does the Strategic Carbon Assessment [APP-206] consider the embodied carbon of the existing WWTP? Please justify the approach taken in this regard.	The SCA compares the proposed relocation of the WWTP against a reasonable counterfactual which, in this case, is upgrading the existing plant to increase capacity in line with the proposed new plant. As expected, given that much of the infrastructure is already in place, the embodied carbon emissions generated by upgrading the existing plant are significantly lower than those generated by building a new plant. Therefore, this comparison exercise does implicitly account for the embodied carbon of the existing WWTP. If it were to explicitly account for the existing embodied carbon then it would increase the emissions associated with the counterfactual scenario, even if by a relatively insignificant amount, and add further credibility, in carbon terms, to undertaking the proposed development.
6.37	Applicant	**Strategic Carbon Assessment** What assumptions does the Strategic Carbon Assessment [APP-206] make regarding the proposed WWTP and housing – are these generic sewerage plant / housing designs, or ones where emissions have been designed to be minimised?	*WWTP* Anglian Water provided three whole life carbon emissions assessments for the proposed WWTP: Biomethane production (DCO preferred option); Biogas utilised in CHP (proposed development worst case); and DM0 baseline assessment. The DCO preferred option and worst case option both include the adoption of mitigation measures in construction, e.g. a 27% reduction in length and diameter of tunnel and final effluent discharge. The DM0 baseline option does not. The preferred option has significantly net negative operational emissions due to biomethane export benefits. The worst case option and DM0 option involve CHP power generation which does not significantly reduce operational emissions. *Housing* Useful Projects provided three housing options based on construction systems and associated WLC design targets, and fabric specification and energy sources and associated operational carbon EUI targets. Option 1 – Aspirational scenario: Mid-rise low-carbon concrete frame blocks/low-rise timber panellised or CLT homes, target WLC 625 kgCO2e/m^2, ultra-high performance fabric specification, heat pump led scheme, target EUI 35 kWh/m^2.

ExQ1	Question to	Question	Response
			Option 2 – Good practice: Mid-rise low carbon concrete frame blocks/load bearing masonry and timber homes, target WLC 800 kgCO2e/m^2, medium performance fabric specification, site wide heat networks with heat pumps, target EUI 50 kWh/m^2. Option 3 – Business as usual: Mid-rise traditional concrete frame block/load bearing masonry and concrete floor homes, target WLC 1,200 kgCO2e/m^2, medium performance fabric specification, space heating with radiators and electric boilers, target EU 100 kWh/m^2. The same embodied carbon factors are used across both the proposed development and counterfactual sites. This is likely to produce a conservative estimate of the difference in emissions, given that the North East Cambridge site will be a brownfield site and is likely to have a significantly lower infrastructure load.
6.38	Applicant	**Strategic Carbon Assessment** Does the Strategic Carbon Assessment [APP-206] take into consideration the demolition and decommissioning of the existing Waterbeach Water Recycling Centre? Please justify the approach taken in this regard.	The assessment parameters are based on the design of the proposed WWTP and access, transfer tunnel route and outfall location, Waterbeach pipeline route and connections within the existing Cambridge WWTP as described in Chapter 2: Project Description. The assessment considers a realistic maximum design envelope based on the maximum scale of the elements; as a result, effects of equal or lesser significance than those assessed are likely. The Strategic Carbon Assessment does not take into consideration Waterbeach WRC, however, the Applicant commits to undertake an assessment of the indicative scale of demolition emissions based on structure volumes and site area to be cleared on the existing site to demonstrate the likely scale of these emissions. These will be provided by Deadline 3 as part of an updated 7.5.2 Planning Statement Strategic Carbon Assessment (App Doc Ref 7.5.2) **[APP-206]**.
6.39	Applicant	**Construction carbon emissions** Does the construction of either the Applicant's preferred option (gas to grid recovery), or the CHP option result in different carbon emissions during construction – if so, please provide a table setting out the different carbon emissions for each option based on Table 4-1 in ES Chapter 10 [APP-042]. How has the carbon emissions for proposed solar panels been calculated in terms of carbon emissions within Table 4-1 of ES Chapter 10 as the quantity and extent of the solar panels is not fixed – is this based on a maximum parameter, if so, please confirm what this is and what is the likely generating capacity.	As stated in ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**] in a note under Table 4-8, the CHP option has used the same construction carbon assessment as the biomethane production option to represent a worst-case position for this option. In reality, less carbon-intensive infrastructure would be required for a CHP installation. For solar panel construction carbon calculations, Table 2-2 of ES Appendix 10.1 GHG Calculations (App Doc Ref 5.4.10.1) [**APP-109**] provides the breakdown of emissions. This has been estimated based on technical datasheets and EPDs of individual components for similar capacity panels. For this calculation it has been assumed that 2 x 3600 kW panels will be required. Capacity of generation is provided within ES Appendix 10.2 Outline Carbon Management Plan (App Doc Ref 5.4.10.2) **[AS-076]** as meeting 19% of the site's power demand under the gas to grid option at 5.6MW peak capacity.
6.40	Applicant	**Energy generation** Please identify where the potential on site energy generation capacity is quantified and whether this is sufficient to provide the energy requirement of the Proposed Development?	ES Appendix 10.2 Outline Carbon Management Plan (App Doc Ref 5.4.10.2) **[AS-076]** states that the solar panels will provide 19% of the site's power demand under the gas to grid option, which is the Applicant's preferred option. Table 3-2 of ES Appendix 10.2 Outline Carbon Management Plan (App Doc Ref 5.4.10.2) **[AS-076]** shows that the CHP offsets approximately half of the imported power, by way of emissions reductions, based on 5.6MW peak capacity.
6.41	Applicant	**Water sector carbon emissions** Please confirm what percentage the preferred and CHP option's net carbon emissions are of the estimated UK water sector emissions.	The preferred option would provide a net reduction in the UK water sector emissions, as it has a net annual emissions reduction. The net operational carbon emissions from the CHP option account for 0.08% of net UK water sector annual operational emissions. This is based on CHP option having 1110tCO2e/y and the latest water sector annual emissions from Discover Water being 1,371ktCO2e. This clarification has been acknowledged and percentages of estimated UK water sector emissions for the different options will be added to ES Chapter 10: Carbon (App Doc Ref 5.2.10) [**APP-042**], alongside responses to Questions 6.3, 6.18, and 6.22 at Deadline 3. This allows time for other amendments to be made within the document, such as updates to the whole life assessment period to align with the operational design life.

ExQ1	Question to	Question	Response
6.42	Applicant	**Carbon Management Plan** ES Chapter 10 [APP-042] para 5.1.4 confirms that the CHP option would have a whole life net impact of the production of 71,480 tCO2e and this it to be mitigated using an operational Carbon Management Plan. An outline Carbon Management Plan is provided with the application [AS-076]. This implies that carbon emissions would not be monitored for the preferred option. a) How would carbon emissions for both options be monitored during construction, commissioning and decommissioning and then offset, through an operational carbon management plan? b) R21 of the dDCO [AS-139] requires the Proposed Development to be operationally net zero - how does this ensure that carbon emissions from construction, commissioning and decommissioning (of the existing WWTP) would be satisfactorily offset? c) Does R21 of the dDCO [AS-139] sufficiently allow for updates to the management and operation of the Proposed Development to reduce carbon emissions to meet any future carbon legislative requirements? d) According to the outline carbon management plan [AS-076], the operational carbon footprint of the Proposed Development would be reported in line with regulatory requirements - how would net emissions from construction, commissioning and operation be monitored and who would this information be provided to? What would happen if net zero carbon emissions for either option were not being achieved (either operationally or when considering the construction, commissioning and decommissioning of the site for either option)?	The DCO Requirement 21 sets an obligation to agree an Operational Carbon Management Plan showing how the net zero operational emissions commitment will be achieved. This is applicable for both the preferred option and the CHP option. a) The Operational Carbon Management Plan highlights that the Applicant will report its operational emissions from the Proposed Development on an annual basis in alignment with its existing annual operational emissions regulatory reporting requirement. This will include emissions from commissioning in the first year of operation. Expected construction emissions will continue to be assessed through the detailed design development. b) The Applicant has not committed to offsetting construction or decommissioning emissions, however, has set an aspirational target to reduce these emissions by 70% against its baseline assessment, which it will continue to monitor and report as part of its detailed design. c) The Applicant would naturally be required to meet any future legislative requirements to reduce carbon emissions, its current commitments go beyond all existing legislative requirements to reduce emissions. Future legislative change would also provide a reasonable timescale to adapt to deliver any additional infrastructure or retrofits required to meet legislative targets, and these would likely be funded through the Applicants existing regulatory process. d) The Applicant has only committed to achieving net zero operational carbon emissions, as detailed in ES Appendix 10.2 Outline Carbon Management Plan (App Doc Ref 5.4.10.2) **[AS-076]**. The Applicant is committed to secure sufficient offsetting credits to meet expected operational emissions, if, for whatever reason, the Proposed Developments residual operational emissions were to exceed the secured level of offsets, the Applicant would be required to secure an additional scale of offsets.
6.43	Applicant	**Carbon Management Plan** Outline Carbon Management Plan [AS-076] para 3.3.9 states that updates will be provided on new best practise methods to improve process emissions from water regulators within the detailed Carbon Management Plan. When are the regulators likely to offer advice on this matter?	The Applicant does not have a specific date when the regulator is likely to offer additional advice on the matter. Phase 1 of the UK Water Industry Research Council study on process emissions (BQ10 – WWTWS PROCESS EMISSIONS: OPTIMISATION OF CURRENT PROCESSES) has been completed, and the second phase is underway to gather evidence on the best methods for controlling nitrous oxide and methane emissions through modified operation of existing assets, e.g. through real time monitoring and control, and repair and maintenance. It is expected the findings of this research and other sector research activities will inform regulatory advice in the next few years.
6.44	CCC, SCDC, CCoC,	**Carbon Management Plan** Please review and provide comments on the acceptability of the outline Carbon Management Plan [AS-076].	
6.45	Applicant	**Alternatives to exporting gas to the grid** *Please respond to CCC's comment [RR-*001]: *When considering the entire lifetime of the plant, it would be helpful to understand alternatives to exporting gas to the grid considering the move to electrification of heating.*	The Applicant has talked to the local DNO to confirm there is capacity. If the grid capacity is reduced (or if it is repurposed for hydrogen in future and hence can't take biomethane) then the Applicant would explore other options. Options could include liquifying or compressing the biomethane for export by tanker ('virtual pipeline') for use elsewhere, or using it as a vehicle fuel for refilling AWS sludge import vehicles. Technologies for converting biomethane to hydrogen are also being developed and may be technically viable and cost effective to use at the site in the longer term. Additional technologies could feasibly use the biomethane should injection to the grid no longer be the preferred option. Options could include; • compressing or liquifying the gas to produce Compressed or Liquified Biogas (CBG/LBG) – this can then either be bottled or used in vehicles to replace fossil fuels (Diesel) • creation of blue hydrogen, utilising solar as a power source and coupled with CO_2 capture to produce a low emission fuel

ExQ1	Question to	Question	Response
			The viability and preferred options from these technologies would need to be reviewed as and when grid injection was no longer seen as a beneficial end-use of biogas.
6.46	Applicant	**Carbon emissions from sludge deliveries** How have the carbon emissions from the deliveries of sludge been assessed within ES Chapter 10 [APP-042]? Could changes in delivery patterns over time (e.g. more deliveries from satellite sites further afar) increase carbon emissions to the extent that the Proposed Development operates outside of the impacts assessed within the ES? To this end, should deliveries of sludge and where they originate from be controlled through the dDCO? Should there be a definite commitment to utilise a low or zero emission vehicle fleet for example?	Sludge transport emissions have been assessed by taking current typical transport distance of sludge digestate (30km) and multiplied by an emissions factor for an Artic Diesel lorry, accounting for a return journey. There is no expectation that the relocation of the existing site would increase distance from satellite sites. Controlling the origin and location of satellite sludge deliveries could have a perverse outcome on emissions, as whilst distance is a key factor in cost and emissions associated with transport, other factors like availability and traffic/road closures are all variables that the Applicant needs to consider when optimising its sludge transport logistics. If site locations were restricted, this could lead to aged sludge being left at satellite sites for longer periods of time releasing methane and reducing biogas generation volumes.

7. Community

ExQ1	Question to	Question	Response
7.1	Applicant	**Clarification – River Cam works** Para 4.2.28 of ES Chapter 11 Community [AS-028] states that *Section 3.1 of the CoCP Part B (Appendix 2.2, App Doc Ref 5.4.2.2) includes limiting the construction activity in the river to between mid-June and early September and defining a minimum river width that must be retained throughout the duration of the construction.* PDF Page 11/40 of CoCP Part B [AS-161] states that *works are planned for July to October*. PDF Page 9/40 of CoCP Part B states that *core working hours for winter and summer will be complied with.* In the UK winter starts on 1 December and ends on the last day of February. Please clarify the period within which works to the River Cam would take place and ensure consistency between applicant documents. If CoCP Part B is to be re-issued please correct the internal page numbering and ensure that it is fully searchable.	The Applicant engaged with the Cam Conservators to determine the season that working on the river would best suit their needs. It was agreed that the work in the river would be best planned for July and mid-September. During July and Mid-September the construction work will consist of the sheet piled coffer dam located on the eastern bank of the River Cam.The outfall structure is to be constructed of reinforced concrete using either cast-in-situ or precast techniques. The riverbed, immediately in front of the outfall structure, will require re-profiling and protected with an anti-scour material (such as riprap). The anti-scour material will be retained by a sheet pile toe beam. A watertight cofferdam will be constructed around the outfall and formed from a combination of permanent piles and temporary piles. Once the piles for the cofferdam have been installed this will provide a dry working space for the outfall construction. It is expected that works would continue on the construction of the outfall structure throughout the 12 month period along with the installation and connection of the FE and Storm pipes to the outfall structure. The overall timeframe for the works at the River Cam will take approximately 12 months. With regards reference to differing working hours on pages 9 and 11, these need to be put into the context that they relate to different parts of the proposed development: Page 9 comment = relates to works discussed under 'Section 3.2 on the Transfer Tunnel' Page 11 comment = relates to works discussed under 'Section 3.3 Proposed Waste Water Treatment Plant (WWTP)' Due to different nature and timings for these works within the overall construction programme, there would be differences in the stated working hours. This also applies to comparing working hours for works described in 'Section 3.1 Treated effluent and storm pipelines and outfall to the River Cam'. The ExA is instead directed to as described in Section '5.10 Working hours' in application document 5.4.2.1 Code of Construction Practice (CoCP) Part A, resubmitted at Deadline 1, for a detailed breakdown of working hours, including between winter and summer, for each element of the proposed development.
7.2	Applicant	**Clarification – incomplete paragraph** On page vi of ES Chapter 11 [AS-028] it is stated that *The public right of way (PRoW) 85/6 along the east bank of the River Cam would be temporarily diverted for a period of up to 4 months for approximately 770m around the land temporarily required for construction of the outfall. It is assessed that there would be a temporary neutral effect on the users of* - Please complete this paragraph.	The Applicant has included corrections within the Environmental Statement Errata provided at Deadline 1, page vi of ES Chapter 11: Community (App Doc Ref 5.2.11) [**AS-028**] as follows: "*The public right of way (PRoW) 85/6 along the east bank of the River Cam would be temporarily diverted for a period of up to 4 months for approximately 770m around the land temporarily required for construction of the outfall. It is assessed that there would be a temporary neutral effect on the users of* ***PRoW 85/6****."*
7.3	Applicant	**National policy** Does para 1.3.3 of ES Chapter 11 [AS-028] relate to the NPPF? If so, there appear to be discrepancies in the section titles and paragraph numbers referred to. Please address this.	Paragraph 1.3.3 of ES Chapter 11: Community (App Doc Ref 5.2.11) [**AS-028**] relates to the NPPF. The Applicant has updated paragraph numbers within the Environmental Statement Errata provided at Deadline 1 to remove reference to paragraphs 80 and 91, as per the proposed changes set out below: "*1.3.3 National planning policy of relevance to community, and pertinent to the Proposed Development, are listed below.* • *Section 6: Building a strong, competitive economy (paragraphs 82-83);* • *Section 12: Achieving well designed places (paragraphs 127-128); and* • *Section 8: Building health and safe communities (paragraphs 92, 96 and 98) (Ministry of Housing, Communities and Local Government, 2021)."*
7.4	Applicant	**Clarification – employment numbers** Para 4.2.3 of ES Chapter 11 [AS-028] says that construction employment would peak at 60 supervisory and administrative staff and 300 staff. Para 3.10.2 of ES Chapter 2 [APP-034] says that construction employment would peak at 75 supervisory and administrative staff and 300 operatives. Para 6.2.1 of the Construction Workers Travel Plan [APP-150] says that during construction, 300 people on average are likely to be on site per day and that during the peak stage of construction (Q4 2026 to Q1 2027), this would rise to 422 people on site per day. a) Which is the correct figure for the peak: 360, 375 or 422 people? b) Is this figure solely for the proposed WWTP site or does it cover all works within the Order Limits? c) Please provide a breakdown of construction employment by work site (ie proposed WWTP, transfer tunnel, Waterbeach Pipeline and existing WWTP). d) Please confirm whether any of the submitted assessments or documents need to be amended in light of your response to a).	The Applicant confirms the following: a) Construction employment would peak at 422 as described in paragraph 6.2.1 of ES Appendix 19.9 Construction Workers Travel Plan (App Doc Ref 5.4.19.9) [**APP-150**]. b) Construction employment covers the proposed WWTP only. The Waterbeach transfer pipeline is covered separately. c) Section 3.4.62 of ES Chapter 2: Project Description (App Doc Ref 5.2.2) [**APP-034**] provides details for the number of construction staff on the Waterbeach transfer pipeline. Section 3.10.2 of ES Chapter 2: Project Description (App Doc Ref 5.2.2) [**APP-034**] provides details of the number of construction staff for the WWTP, which includes the transfer tunnel and existing Cambridge WWTP. d) The conclusions of ES Chapter 11: Community (App Doc Ref 5.2.11) [**AS-028**] are unchanged by the response to part a) above. This is because the change in construction employment from 360 to 422 does not change the magnitude of impact for this effect, therefore the significance of effect remains minor

ExQ1	Question to	Question	Response
			beneficial (not significant). This error has been acknowledged in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1.
7.5	Applicant	**Environmental Statement – Horningsea Road – clarification** Para 4.2.45 of ES Chapter 11 [AS-028] states that *The sensitivity of pedestrians, cyclists and horse-riders using the section of Horningsea Road extending south by 755m from the junction with Horningsea Road are of high sensitivity...* Please clarify the location of the junction referred to.	The junction referred to is the A14. The Applicant has updated paragraph 4.2.45 of ES Chapter 11: Community (App Doc Ref 5.2.11) [**AS-028**], as follows: "*The sensitivity of pedestrians, cyclists and horse-riders using the section of Horningsea Road extending south by 755m from the junction with the A14 are of high sensitivity...*"
7.6	Applicant	**Public rights of way – analysis of effects** Part 1 of Schedule 6 of the dDCO [AS-139] sets out 'Public Rights of Way to be Temporarily Closed for which a Substitute is to be Provided'. The Schedule includes: • Footpath FP247/10 between points R13 and R14 on sheet 9 of the rights of way plans [AS-153]; and • Footpath FP130/12 between points R11 and R12 on sheet 9 of the rights of way plans [AS-153]. There is no analysis in ES Chapter 11 [AS-028] as to the impacts of the temporary closures or of any mitigation measures. Please update Chapter 11 accordingly.	Impacts on PRoW (including 130/12 and 247/10) are reported within Section 4.2 and Table 5-2 of ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]**. The Applicant only reports significant effects on PRoW, within the ES Chapter 11: Community (App Doc Ref 5.2.11) [**AS-028**] and these components of Schedule 6 are not predicted to result in significant effects.
7.7	Applicant	**Public rights of way – provisions in the dDCO** Part 1 of Schedule 6 of the dDCO [AS-139] refers to documents 4.6.2, 4.6.8, 4.6.9, 4.6.6. However, these are drawing numbers in Document 4.6 [AS-153]. The same is the case in other schedules when referring to other documents. Please amend the references in the dDCO as necessary.	The Applicant notes that this was raised in the Procedural Decision of 10 August 2023 (PD-004). The Applicant responded in the DCO Changes Tracker (App Doc Ref 2.1) **[AS-141].** See response below: "The Applicant's approach to the drafting of the DCO is to refer to a particular sheet within a series of documents where relevant, for example, using 4.6.1 to refer to sheet 1 of that plan series which is the relevant sheet identifying the extent of a public right of way to be temporarily closed, rather than 4.6 which is the whole series of plans."
7.8	CCoC	**Draft Active Travel Strategy for Cambridgeshire** 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?	
7.9	Applicant	**Temporary and permanent requirements for land – proposed WWTP** How would the vehicular access to Poplar Hall and Poplar Hall Farm be affected during the construction phase? How should the magnitude of any impact be categorised?	The Applicant has not identified any significant effects on the access to Poplar Hall and Poplar Hall Farm within the ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]**. Access will be maintained during the construction phase, as set out in the ES Chapter 19 Appendix 19.7 Construction Traffic Management Plan (App Doc Ref 5.4.19.7) **[AS-109]**.
7.10	Applicant	**Environmental Statement – Community Facilities** On page 11 of ES Chapter 11 [AS-028] it is not clear whether all potential receptors on the list collected by residents and provided by Fen Ditton Parish Council have been taken into account. Please confirm whether these have all been included or, if some have not been included, set out the justification for not including them.	The Applicant has considered the community facilities listed by FDPC. The following community facilities are not within the study area: - Fen Ditton Parish Council Cemetery on Plough Hill/Church Street; - The City Cemetery on Newmarket Road; and - the majority of community facilities located in Fen Ditton including the church, playground and village halls mentioned by FDPC. In paragraph 3.1.26 of Chapter 11: Community (App Doc Ref 5.2.11) [**AS-028]**, the description of Horningsea community facilities included some of those in the settlement, including Horningsea Village Hall (the venue for the Horningsea Adult and Toddler Group). The facilities specifically mentioned in baseline paragraph plus Laney Meadow, the community allotment at the end of Priority Road and Horningsea Parish Council Cemetery on Horningsea Road (i.e. those listed by FDPC), were considered in the assessing the of effects of the Proposed Development on the settlement of Horningsea. The assessment did not identify any significant effects. There is not expected to be any temporary or permanent land requirement, or significant effects on the amenity of community facilities. Access along Horningsea Road will be maintained throughout the construction and operational phases. The assessment considered the intermittent construction activities affecting Horningsea (including community facilities) and no significant effects were identified.

ExQ1	Question to	Question	Response
7.11	Applicant	**Proposed Discovery Centre** On page 11 of Applicant Regard to Section 42 Consultation Responses [APP-167] it is stated that some respondents to consultation questioned the value of the Discovery Centre. As an alternative, has the Applicant considered delivering its educational programme by visiting schools and groups in their own premises rather than having schools and groups visit the proposed WWTP?	The alternative suggested by the ExA is already an existing practice carried out by the Applicant as part of its education and community engagement programme. The existing Cambridge WWTP is part of this programme with educational site tours being undertaken by local schools and groups. Continuing this at the proposed WWTP through the provision of the Discovery Centre will allow the Applicant to continue providing this service to the local region. The Applicant has received support for the Discovery Centre from several different stakeholders. South Cambridgeshire District Council's Relevant Representation (RR-004) stated that "The proposals include the provision of the 'Discovery Centre' to improve education in relation to water management and stewardship in a water stressed area of the Country where careful use of water is of growing significance. The public, especially the younger generation, will get an opportunity to learn about the importance of water management which is a further benefit". The County Council specifically highlighted the Discovery Centre as part of this recreational area explaining that the: "Discovery Centre... will provide awareness and educational opportunities on the topics such as the circular economy, the water life cycle and wider environment and sustainability issues."
7.12	Applicant	**Site of Proposed Development** a) Is there any permitted recreational use of the site of the proposed WWTP at present? b) Are any other recreational facilities affected by the Proposed Development, whether temporarily or permanently? c) Are there any informal or permissive walking routes across the proposed WWTP site at the present time?	a) The Applicant understands there to be no permitted recreational use or permissive or public rights of ways through the proposed WWTP site at present. b) The Applicant has set out recreational facilities affected by the Proposed Development in paragraphs 3.1.30 to 3.1.58 in ES Chapter 11: Community (App Doc Ref 5.2.11) **[AS-028]**. c) It is the Applicant's understanding that the land is privately owned, and the public access is unauthorised. The Applicant notes that the current tenant farmer has taken steps to prevent unauthorised access to the land.
7.13	Applicant	**Site of proposed WWTP – use of green space** On page 10 of Applicant Regard to Section 47 Consultation Responses [APP-166] it is stated that: *...the Applicant confirms that the green space is not intended as a recreational destination in its own right, the aim is to create connectivity to the surrounding area.* - How would the proposed green space create connectivity when compared with the existing network of highways and PRoW?	ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (LERMP) (App Doc Ref 5.4.8.14) [**AS-066**) details how the proposals will increase recreational connectivity by augmenting the existing highway and PRoW network through the provision of the proposed new bridleway and permissive paths on the site of the proposed WWTP which deliver new opportunities for circular routes. The approach to recreation and the improvements to recreational connectivity are described at section 3.5 of ES Appendix 8.14 LERMP (App Doc Ref 5.4.8.14) [**AS-066**), with more detail provided on walking routes (sections 3.5.7 to 3.5.9 and Figure 3.12), cycling (section 3.5.10 and Figure 3.13) and horse riding (section 3.5.11 and Figure 3.14). As described in section 2.9 of ES Chapter 2: Project Description (App Doc Ref 5.2.2) [**APP-034**], the Applicant will also provide a new approximately 74m long footway/cycleway link section on the east side of Horningsea Road from the proposed new crossing facility to the junction with Low Fen Drove Way. This will provide a safe and improved connection from the existing PRoW and highway network to the permissive paths on the site of the proposed WWTP and the Discovery Centre as well as to Low Fen Drove Way. This link is show in Figure 2.17 of ES Chapter 2: Project Description (App Doc Ref 5.2.2) [**APP-034**] and on Figures 3.12, 3.13 and 3.14 in ES Appendix 8.14 LERMP (App Doc Ref 5.4.8.14) [**AS-066**).
7.14	Applicant, Conservators of the River Cam	**Temporary disruption to the River Cam navigation** Noting Table 2-7 (page 33 of ES Chapter 11 [AS-028]), para 3.1.30, para 4.2.22, para 4.2.25 and para 4.2.29: a) Whilst the number of university rowers might decrease during the summer university break, is there an increase in the use of the river by other parties during this time? b) If peak usage occurs from March to early November and the duration of construction is likely to be four months, is it possible or desirable for these works to take place from November to March? c) If so, how would this affect the magnitude of the impact? Would it reduce from 'significant'?	a) Whilst different user groups may fluctuate throughout the year, the assessment has considered recreational effects on a range of users. Section 4.2 from paragraphs 4.2.22 to 4.2.29 of ES Chapter 11: Community (App Doc Ref 5.2.11) **[AS-028]** identifies the predicted significant effects to users of the River Cam. The design, timing and duration of the temporary works have accommodated feedback from the navigation authority (Conservancy). Users includes people using the River Cam for punting, swimming, kayaking, fishing, and motor boating, in addition to university and other rowers. b) Working from November to March would mean that the Applicant would be working in the river in the winter period, which would provide greater risk and the potential for adverse weather conditions. The impact of working through the winter would mean that the work may take longer. This would be the least favourable time from the perspective of the Cam Conservators and the Cambridge Rowing Club.

ExQ1	Question to	Question	Response
			c) As covered in b) it is not desirable for these works to take place at an alternative time, therefore no alternative assessment of significance has been undertaken.
7.15	Conservators of the River Cam	**Effects on the River Cam** You expressed concern [RR-023] that this project would affect your ability of the to adequately fulfil your statutory responsibilities of navigation for this stretch of water during construction and that both the short-term and long-term consequences of the project may negatively impact the river, its banks, its ecology and the navigation of its users. a) What are the statutory duties that would be affected? b) What would be the effects on the statutory duties during the construction phase? c) What would be the effects on the statutory duties during the operational phase? What would be the consequences of not being able to fulfil your duties in whole or in part?	
7.16	Applicant	**Public rights of way – diversion (85/6 and 85/8)** At para 4.2.31 and 4.2.32 of ES Chapter 11 [AS-028] it is noted that *during the diversion there would be a period where use of the footpath 85/8 would cease due to the construction corridor related to the open cut construction of the treated effluent pipeline. This would require a longer diversion to the footway/cycleway along the western side of the carriageway to join the PROW 130/1 meaning users of the 85/6 would need to travel an additional 1010m to return to back to the 85/6* and that *The magnitude of the impact is considered to be minor given the limited duration over which they are likely to be impacted. The diversion is unlikely to dissuade people from using these routes to access recreational opportunities.* a) For how long would it not be possible to use footpath 85/8? b) Which carriageway is para 4.2.31 referring to? c) Why would the diversion be shorter for people coming from Horningsea (para 4.2.177 of ES Chapter 19 [AS-038])? d) The temporary closure of 85/8 and diversion to join 130/1 do not appear to be shown on Sheet 2 of the Rights of Way Plans [AS-153]. Should this be illustrated? e) The temporary closure of 85/8 and the 1,010m diversion are not listed in Part 1 of Schedule 6 of the dDCO. Should this be included?	a) Footpath 85/8 would still be used due to the implementation of a safety access gate on the boundaries of the works site for the treated effluent pipeline. The scenario described at Para 4.2.31 and 4.2.32 of ES Chapter 11 [AS-028] refers to a scenario where the gates would not have been implemented and the subsequent 1,010m diversion that would have been required. Given the length of the diversion, a safety access gate was considered to be the better option on 85/8. b) The carriageway refers to Horningsea Road. This is the route that would be required in the absence of the use of gates to facilitate crossing. c) d) The Applicant wishes to clarify that no diversion of 85/8 is required to join 130/1 as this diversion would only have been required under scenarios where the safety gates were not implemented. The Applicant notes that the safety access gates are however not shown on the Right of Way plans, the Right of Way Plans (App Doc Ref 4.6) have now been updated to rectify this omission and provided as part of the Deadline 1 submission. e) Part 1, Schedule 6 of the dDCO (App Doc Ref 2.1) has been updated as part of the Deadline 1 submission to include footpath 85/8.
7.17	Applicant	**Public rights of way – diversions (generally)** A number of the rights of way plans [AS-153] show a 'PUBLIC RIGHT OF WAY (TEMPORARY CLOSURE)' and a 'PUBLIC RIGHT OF WAY (INDICATIVE TEMPORARY DIVERSION)' close to / parallel with to each other. Does this represent a situation where gated access would be made available and the route would not be materially different to the existing route?	The Applicant confirms that this is correct. The public right of ways shown in Rights of Way Plans (App Doc Ref 4.6) **[AS-153]** show a 'PUBLIC RIGHT OF WAY (TEMPORARY CLOSURE)' and a 'PUBLIC RIGHT OF WAY (INDICATIVE TEMPORARY DIVERSION)' close to / parallel with to each other. Gated access would be made available, and the route would not be materially different to the existing route, with the only change being the waiting time at the gated access.
7.18	Applicant	**Public rights of way – clarification regarding access (85/14 and 130/17)** During works around the temporary site access to the proposed WWTP, would an alternative route be provided for recreational users of Low Fen Drove Way so that they could continue to access byway 85/14 and PRoW 130/17 when travelling from Horningsea Road? If so: a) can it be created on land that is or would be under the control of the Applicant; b) where would this diversion be located; and c) how would this diversion be secured?	During the forming of the temporary access way on Low Fen Drove Way, the Applicant is not intending on stopping recreational access along Low Fen Drove Way and therefore an alternative route/diversion is not required to access Low Fen Drove Way. a) Access will be maintained and managed within either the boundary of the highway itself and/or over adjacent land identified within the dDCO to be temporarily acquired for the purpose of creating a temporary diversion; for example, see Rights of Way Plans (App Doc Ref 4.6) **[AS-153]**. b) The Applicant is not intending on stopping recreational access along Low Fen Drove Way and therefore an alternative route/diversion is not required to access Low Fen Drove Way. Any temporary restrictions due to working in the roadway will be dealt with by means of local traffic management and align with New Roads and Streetworks Act guidance. CAN WE ADD A LINE SAYING THESE POWERS HAVE BEEN TRANSPOSED INTO THE dDCO SO THE MITIGATION CAN BE SECURED AND MANAGED THROUGH THE DCO? c) Any disruption to this access will be minor and not for a significant duration.

ExQ1	Question to	Question	Response
			As per the objectives of the Community Liaison Plan (app Doc Ref 7.8) **[AS-132]**, we will provide information on timings and mitigation arrangements for temporary closures and/or restricted access along local roads, including Low Fen Drove Way.
7.19	Applicant	**Public rights of way – diversion provisions in CoCP** Para 7.6.15 of CoCP Part A [APP-068] states that: *the PRoW will either be temporarily diverted or if the route cannot be diverted temporarily stopped up.* ld any PRoW be stopped up? t, should the reference to stopping-up be omitted?	The reference to stopping up in para 7.6.15 of the CoCP Part A (App Doc Ref 5.4.2.1)[**APP-068**] was intended to refer to the temporary closure of the PRoWs, however the Applicant is not intending to close any. All PRoW which intersect the Proposed Development will be managed through the diversions listed in Schedule 6 of the dDCO (App Doc Ref 2.1) [**AS-139**] and shown on the Rights of Way Plans (App Doc Ref 4.6). A, The temporary access will be stopped up, with the river path having a short temporary diversion. All other PRoW's will be managed in a way that allows continued access. B, The CoCP has been updated to provide further clarity.
7.20	Applicant	**Public rights of way – severance during construction** Para 4.2.58 of ES Chapter 11 [AS-028] states: *Recreational users of PRoW (130/16, 130/10, 130/6 and 130/8) to the east of Waterbeach may experience temporary disruption to the use of these routes which provide access to a wider network of PRoW to the north and south. This is due to construction of the Waterbeach pipeline to the east of Waterbeach and under the railway line, the A14, Horningsea Road and the River Cam.* - Would there be any effect on users accessing these PRoW from the west, whether from other PRoW or from the public highway?	The Applicant has assessed the PRoW which may experience temporary disruption, as set out in the ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]**. As set out in Table 4-67, for PRoW 130/16, 130/10, 130/6 and 130/8: "*Diversion along alternative PRoW requires extends journey by over 500m and users would be required to wait at a gated crossing point for approximately 2 minutes before continuing on the PRoW."* Therefore the Applicant does not anticipate significant effects on users accessing these PRoW from the West.
7.21	Applicant	**Public rights of way – severance during construction** On page vi of ES Chapter 11 [AS-028] it is stated that *The public right of way (PRoW) 85/6 along the east bank of the River Cam would be temporarily diverted for a period of up to 4 months for approximately 770m around the land temporarily required for construction of the outfall. It is assessed that there would be a temporary neutral effect on the users of* [sic] The following is then set out in the same Chapter: *4.2.30 Footpath 85/6 (parallel to the east bank of the River Cam south of the A14 road bridge) will be temporarily closed for a period of up to 6 months during construction of the outfall structure and the treated effluent pipeline. A temporary diversion will be put in place, via PRoW 85/8 (which provides a connection between PRoW 85/6 and PRoW 130/1), throughout the construction period.* and that *4.2.31 During the diversion there would be a period where use of the footpath 85/8 would cease due to the construction corridor related to the open cut construction of the treated effluent pipeline. This would require a longer diversion to the footway/cycleway along the western side of the carriageway to join the PROW 130/1 meaning users of the 85/6 would need to travel an additional 1010m to return to back to the 85/6.* a) How long would the diversion last for – four or six months? b) How long would the closure of PRoW 85/8 last for?	ES Chapter 11: Community (App Doc Ref 5.2.11) **[AS-028]** should state that: a) The diversion would last for up to 11 months. This will not change the traffic and transport assessment but does change sections 4.2.30 to 4.2.36 of the community assessment, assessment should now read as the below. **Fen Ditton (PRoW 85/6 and PRoW 85/8)** <u>Magnitude of impact</u> 4.2.30 Footpath 85/6 (parallel to the east bank of the River Cam south of the A14 road bridge) will be temporarily closed for a period of up to 11months during construction of the outfall structure and the treated effluent pipeline. A temporary diversion will be put in place, via PRoW 85/8 (which provides a connection between ProW 85/6 and ProW 130/1), throughout the construction period. 4.2.31 During the diversion there would be a period where use of the footpath 85/8 would cease due to the construction corridor related to the open cut construction of the treated effluent pipeline. This would require a longer diversion to the footway/cycleway along the western side of the carriageway to join the PROW 130/1 meaning users of the 85/6 would need to travel an additional 1010m to return to back to the 85/6. 4.2.32 The magnitude of the impact is considered to be major given the duration over which they are likely to be impacted. The diversion is unlikely to dissuade people from using these routes to access recreational opportunities. <u>Sensitivity of receptor</u> 4.2.33 The recreational users of PRoW (85/6 and 85/8) are of medium sensitivity because these routes are used frequently for recreational purposes and provide a link to a wider network of PRoW to the north and south. There are limited alternative routes providing a direct connection between Horningsea and Fen Ditton. <u>Significance of effect</u> 4.2.34 Overall, it is predicted that the major magnitude of impact on the medium sensitivity receptor would result in a reversible, temporary moderate significant adverse effect. ~~which is not significant.~~ <u>Secondary mitigation or enhancement</u>

ExQ1	Question to	Question	Response
			4.2.35 The following measures would further mitigate the impact to PRoW 85/6 and PRoW 85/8. These are set out within the COCP Part A (Appendix 2.1, App Doc Ref 5.4.2.1). The measures of particular relevance to PRoWs 85/6 and 85/8 users are: • A requirement for the use of safety gates to be put in place and users allowed to safely cross the construction working area which would allow users diverted on to the 85/8 to cross over the works to construct the treated effluent pipeline and join the temporary diversion back to the 85/6; and • a requirement for all PRoW to be restored to the same condition as before the works took place or to a standard which is acceptable to the Local Highway Authority which returns the paths to the same or better condition, so journey quality is unaffected once the works have been completed. The provision of safety gates allowing users to cross the construction working area would reduce the length of the diversion to 770m for users of PRoW 85/6. <u>Residual effect</u> 4.2.36 Despite the application of these measures, the impact would remain major. The residual effect therefore remains as moderate significant adverse, which is not significant. b) Users of footpath 85/8 would no longer be affected by the open cut construction of the treated effluent pipeline through use of the gated access system for crossing the works area. This error has been acknowledged in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1.
7.22	Applicant	**Public rights of way – CoCP** The CoCP Part A [APP-068] states: ***Public Rights of Way*** *7.6.13 The proposed construction works will impact a number of Public Rights of Way (PRoW). Measures will be put in place to manage the impact upon users of the PRoW during the construction period. 7.6.14 Where practical and feasible continued access to and use of the PRoW will be facilitated in order to minimise the number of diversions required. Safety gates will be put in place and users allowed to safely cross the construction working area. 7.6.15 Where this is not feasible or would create a safety issue, the PRoW will either be temporarily diverted or if the route cannot be diverted temporarily stopped up. Details of proposed diversions are shown on the Rights of Way Plans (App Doc Ref 4.6), referenced Part B of the CoCP and in DCO application (App Doc Ref 2.1).* a) Please explain the measures referred to at para 7.6.13 or where details of these are set out in the application documentation; b) Would safety gates be operated by site personnel or PRoW users? Would there be periods when PRoW users would not be able to cross the construction working area via the gates? If so, how would these periods be communicated to PRoW users, how long would such periods last for and could closures of crossing points be simultaneous (please provide information separately for each PRoW)? c) Please indicate where the details referred to in para 7.6.15 can be found in CoCP Part B [AS-161].	a) As stated in paragraph 7.6.14 of the CoCP Part A (App Doc Ref 5.4.2.1) **[APP-068]**: *Where practical and feasible continued access to and use of the PRoW will be facilitated in order to minimise the number of diversions required. Safety gates will be put in place and users allowed to safely cross the construction working area*. Furthermore, paragraph 7.6.17 of the CoCP Part A sets out the requirements that will be adhered to by the applicant. b) Where a crossing point of the PRoW with safety gates is in place the gate is operated by the site personnel. These gates stop the plant crossing the PRoW and they would be closed to construction vehicles as standard. This gives priotiy access along the PRoW for public. The site operative will operate the gates when a vehicle is required to make a crossing of the PRoW. The site personnel will then close the gates to allow public access along the PRoW or diverted PRoW where that is necessary.. At periods of frequent passing, a Traffic Marshall will be put in place to manage the crossing. The traffic marshall / site operative; will inform PRoW users about duration of gate closure; the Applicant expects the typical duration of a PRoW closure to be 2-3 minutes . c) Details on PRoW diversions can be found in the CoCP Part B (App Doc Ref 5.4.2.2) **[AS-161]** in the following sections: - Section 3.1 ‘Treated effluent and storm pipelines and outfall to the River Cam’ under Transport and Access - Section 3.4 ‘Waterbeach pipeline’ under Transport and Access
7.23	CCoC	**Public rights of way – management plans** 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. 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.	

ExQ1	Question to	Question	Response
7.24	Applicant	**Site of proposed WWTP – proposed routes** Design and Access Statement (DAS) para 6.12.1 [AS-168] states that: *A key objective of the Proposed Development is to expand and create recreational opportunities, employing new routes through the proposed WWTP site, adding a new bridleway, and linking to existing routes that expand the network of PRoW. As the masterplan and LERMP developed, this strategy was integrated into the layout of routes and paths.* Whilst some parties have welcomed the proposed Bridleway (e.g. CCoC on page 84 of Applicant Regard to Section 42 Consultation Responses [APP-167]), a number of parties have raised issue with the proposed arrangements, for example: • The RR of the British Horse Society [RR-036] says that the proposed PRoW should be a Restricted Byway; that the permissive path across the application site should be a Restricted Byway; and that the proposed Horningsea Road crossing should be in a different location and designed for a wider variety of users. • SCDC's RR [RR-004] notes that that the extension to the B1047 does not include equestrian use and that it would be beneficial to include bridleway use as part of this circular route which would connect to new developments at Marleigh as well as Cambridge. It also says that the extent of the proposed new bridleway as part of the disused railway needs to be considered. • Stow-cum-Quy Parish Council's RR [RR-008] says that the plan to improve the proposed bridleway between the site and Quy is unclear and that there needs to be sufficient consideration given to prevent any unlawful vehicles using the bridleway, which is already a concern. • The NT RR [RR-031] says that the proposed bridleway does not connect well to Anglesey Abbey and does not provide a direct route. It suggests that this could create conflict as the most direct and obvious route to Anglesey Abbey is to continue along the dismantled railway (not shown on submitted plans) in a north easterly direction, but this is on private land. During pre-application discussions the National Trust requested that the Applicant explores the possibility of extending the new bridleway along the dismantled railway route to make this connection to Anglesey Abbey and is disappointed that this cannot be achieved. • NT also states, with reference to the Stow-Cum-Quy Fen SSSI, that an uplift in recreational use of the area could have negative implications on sensitive designated sites through increased disturbance, damage, contamination, etc and could also impact on the surrounding public rights of way. It says that the impacts of this application must be considered cumulatively with uplift in recreational use of the area associated with the proposed housing growth which would be delivered through the existing and emerging Local Plan, including the housing which would be enabled by the proposed development. a) What is the 'extension to the B1047' referred to by SCDC? b) Would the landowner agree to the proposed PRoW being a Restricted Byway? c) Why does the proposed PRoW not continue further along the dismantled railway towards Anglesey Abbey? d) Why are the permissive routes across the application site not being provided to Restricted Byway standard? e) Please explain the choice of crossing location on Horningsea Road, rather than it being located at the junction to Low Fen Drove. Could this be relocated to the junction of Low Fen Drove Way as suggested? f) Why is the creation of recreational opportunities a *key objective* of the Proposed Development? Is this necessary, and would the development be unacceptable without such facilities? g) Having seen the issues raised in the RRs (e.g. in relation to increased pressure on the SSSI) would it be preferable to omit any of the proposed PRoW or permissive routes – could any negatives outweigh any positives in the overall planning balance?	a) The Applicant believes that the extension of the B1047 that SCDC refers to in its relevant representation (RR-004) is the provision of the footway on the eastern side of Horningsea Road to Low Fen Drove Way and widening of the footpath on the western side of the carriageway and a new pedestrian crossing, described section 2.9 of ES Chapter 2: Project Description (App Doc Ref 5.2.2) [**APP-034**]. b) The landowner will not agree to the PRoW being a Restricted Byway. c) There is already a PRoW (FP 218/4) connecting Anglesey Abbey with Station Road and a Bridleway (Bridleway 218/5) connecting Station Road with Stow Cum Quy Fen and Horningsea therefore it is the view of the Applicant that there are sufficient connections within the existing PRoW network for Non-Motorised Users. d) The Applicant has assumed that this is a reference to Restricted Byway **status** (rather than "**standard**"), which would permit carriage driving across the land. The legal status of a Restricted Byway is not compatible with the permissive nature of access which, for operational reasons, the Applicant wishes to establish, across the multi-functional land described in the Landscape, Ecological and Recreational Management Plan ("LERMP", AS-066). Additionally, as described in the LERMP, these are primarily multi-user paths for recreational cyclists and pedestrians, not equestrian uses (see figures 3.12, 3.13 and 3.14 and page 57 of the LERMP) e) The location of the proposed central island to facilitate the crossing of Horningsea Road as shown on Sheet 1 of Design Plans – Highways and Site Access (App Doc Ref 4.11) **[APP-025]** was selected by the Applicant due to the location being on a section of Horningsea Road with good visibility for pedestrians to cross the road, and positioned away from the existing vehicular junction with Low Fen Drove Way and Biggin Lane to the north, and the signalised junction to the south. . Placing the crossing at the junction to Low Fen Drove Way would be unsuitable for the following reasons: pedestrians and cyclists crossing the road at this location would come into conflict with vehicles turning into and out of Low Fen Drove Way and Biggin Lane; a central island at this location could potentially restrict turning movements for vehicles turning into and out of Low Fen Drove Way and Biggin Lane; moving the proposed pedestrian crossing point further north on Horningsea Road would increase the distance travelled by pedestrians and cyclists accessing the site from the south.It should be noted that the recreational opportunities provided by the project will be either delivered as part of the multi-functional proposals presented in the Landscape, Ecological and Recreational Management Plan ("LERMP", (App Doc Ref 5.4.8.14) **AS-066**) or are aligned with the LERMP. The recreational elements should therefore not be considered in isolation, but rather as part of the LERMP, which has been developed in accordance with the National Infrastructure Commission's (NIC) Design Principles for National Infrastructure, which advise NSIP promoters to seek to share benefits widely ("people"), provide a sense of identity ("places") and seeking to solve multiple issues with a single solution ("value"). As recognised at paragraph 2.1.4 of the Design and Access Statement [**AS-168**], the design of the proposed WWTP must not only perform within its regulated requirements but also respond and be sensitive to the context in which it is situated (including the surrounding landscape setting and character), reflecting stakeholder feedback, following the NIC 'good design' principles, enshrined in the NPSWW (paragraph 3.5), recognising the need for mitigations for potential impacts (see e.g. NPSWW paragraphs 4.8.19 to 4.8.24 and NPPF paragraph 145). The creation of recreational opportunities is a key component of the environmental mitigation and enhancement measures given the location of the Proposed Development in open countryside and the Cambridge Green Belt and reflects Design Principles 3 and 4 and the Strategic Objective to improve connectivity for non-motorised users (NMU). DAS section 7.14 describes the purpose and approach to Access and Recreational Amenity fully. The Applicant considers that these measures are necessary and appropriate and that their exclusion would undermine the robust mitigation approach adopted in the design. f) The assessment at Chapter 8 Biodiversity of the Environmental Statement (App Doc Ref 5.2.8 - AS-026) concludes that the magnitude of risk of this impact of the Proposed Development having an adverse effect on the Stow-cum-Quy Fen SSSI (which is over 850m distant from the nearest point of the proposed PRoW) either directly or indirectly through increased recreational use of the proposed PRoW and area is negligible (Table 5.1). Long-term application of ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**], which requires that the Applicant to prepare a

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		h) Given that the route across the site and connecting with Low Fen Drove Way would be permissive, how would this be secured if development consent was granted? Would there be a minimum period of time that the Applicant would undertake to make it available for use / guarantee that it would not be closed? i) On page 84 of the DAS [AS-168] the 'Final Masterplan' drawing indicates a 'Pedestrian only – controlled access' route, illustrated with brown dots. How and when would access be controlled? j) On page 84 of the DAS [AS-168] the 'Final Masterplan' drawing indicates a 'Site Access Cycle Route' with orange dots. How would pedestrians and wheelchair users access the site?	detailed management and maintenance plan (secured through Requirements 11 in the draft DCO (App Doc Ref 2.1) [**AS-139**]), based on ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**], which will be agreed with key stakeholders. In relation to users, Section 4 of the Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**] includes the requirement to complete a user survey at least twice a year to understand how people are interacting with the recreational space and accessing the wider network of PRoW and permissive paths. The Applicant also refers to paragraph 4.1.2 and 4.1.4 of ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**], which confirms the commitment to set up an Advisory Group. Through this Advisory Group, matters such as recreational use can continue to be discussed and managed. The Applicant would continue to engage with relevant stakeholders including, but not limited to, councils (such as Cambridgeshire County Council, Cambridge City Council, South Cambridgeshire District Council and East Cambridgeshire District Council) and Natural England in relation to the development of the detailed Landscape, Ecological and Recreational Management Plan including the terms of reference for the Advisory Group. The terms of reference would form part of the detailed Landscape, Ecological and Recreational Management Plan. The Applicant considers that the benefits of providing this route, which will provide an enhanced connection for walkers, cyclists and equestrian users to the existing formal PRoW network (described at section 7.4 of the DAS (App Doc Ref 7.6 - AS-168), substantially outweigh this perceived risk. g) The provision of the permissive paths on site is secured through Requirement 11 'Landscape, Ecological and Recreational Management Plan (LERMP)' of the draft Development Consent Order (App Doc Ref 2.1) **[AS-139]**. Table 4.1 'Landscape Masterplan Creation' of the LERMP (App Doc Ref 5.4.8.14) **[AS-066]** states that the permissive paths within the Landscape Masterplan area would be available for use following completion of the proposed WWTP construction and removal of the construction fencing. The permissive paths within the Landscape Masterplan would be retained for at least 30 years in line with paragraph 5.1.3 of the LERMP. h) The Pedestrian only-controlled access shown on Page 84 of the Design & Access Statement (DAS) (App Doc Ref 7.6) **[AS-168]** would be accessible by gated accesses off the Gateway Building and at the points shown as 'O' on Figure 3.2 of the LERMP (App Doc Ref 5.4.8.14) **[AS-066]**. Access to the Pedestrian only-controlled access route would only be permitted during the educational site visits. i) The Site Access Cycle Route on the Final Masterplan, page 84 of the Design & Access Statement (DAS) (App Doc Ref 7.6) **[AS-168]**, indicates a separate entrance to the proposed WWTP for pedestrians and cyclists.
7.25	Applicant, SCDC	**Site of proposed WWTP – proposed routes** On page 51 of [APP-167] it is reported that SCDC raised concerns that users of the proposed walking routes might park in Horningsea village. At para 64 of its RR [RR-004], SCDC notes that the expansion of and improvements to existing and proposed new rights of way poses a potential risk of intensification of car-borne visitors to the area for the purpose of using these rights of way for recreation. It says that further consideration of the most appropriate means to manage this issue would, in the view of SCDC, be required to be addressed by conditions or other measures and that any such measures would also need to be kept under review. a) If the purpose of the walking routes, as implied by the Applicant on page 51, is not to increase usage / to provide greater choice to the existing community, is there any significant benefit to the creation of the proposed routes and the possible consequential impacts arising from the redistribution of car parking? b) How does the Applicant envisage that usage could change as a result of other major housing developments within the catchment area of the proposed walking routes? c) What evidence does the Applicant have to support its suggestion that there would not be a significant increase in usage? d) What evidence does SCDC have to suggest that there would be an increase in car parking pressure?	a) There is significant benefit in improving the connectivity with the highway and PRoW network in the vicinity of the Proposed Development for existing pedestrians, cyclists and equestrians, who do not currently access the area by cars. It is not clear what the reference to "redistribution of car parking" in this question refers to, however any adverse effects arising from unforeseen changes in car parking arising from recreational use of the proposed recreational elements would be addressed through the provisions of the proposed s.106 agreement with the Cambridgeshire County Council which provides for monitoring and, if required, the payment of a contribution towards parking management measures in identified areas along Horningsea Road and Low Fen Drove Way (see response to ExAQ 1.5 and **AS-134**). b) Changes in usage arising from other developments would be considered as part of the planning process for those developments. Discussions with Cambridgeshire County Council and South Cambridge District Council have indicated that the recreational connectivity of proposed developments on the North Eastern and Eastern fringes of Cambridge could increase the usage of PRoWs in the vicinity of the proposed WWTP site but that access from those residential developments would most likely be via walking or cycling routes, not car. c) The Applicant intends to formalise how users are currently using the land required for the construction of the permanent access, proposed WWTP and area required for the landscape masterplan. In developing the landscape masterplan the Applicant has sought to understand how people use this location. This

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			understanding has been informed through consultation responses as well as automated traffic surveys (reported in Baseline Traffic Surveys (App Doc Ref 5.4.19.1)) [APP-141], and Re-survey May 2022 Traffic Surveys (App Doc Ref 5.4.19.2)[App-142]) and user count surveys (provided in Pedestrian Counts (App Doc Ref 5.4.19.4) [APP-145]) to understand how people use this location. As the Applicant intends to formalise use and does not enhance or improve parking opportunity the assessment is based on sustained levels of recreational use. However recognising some uncertainty in the anticipated user numbers the Applicant has through the LERMP (App Doc Ref 5.4.8.14) [**AS-066**] included the requirement for monitoring usage of the recreational elements of the LERMP and to share and discuss the outcomes of these surveys with stakeholders, with the intent of updating management activities should surveys indicate that usage levels are problematic. Furthermore, as described in part a) The Applicant would address unforeseen changes in carparking through the provisions of the proposed s.106 agreement with the Cambridgeshire County Council. d) Not for the Applicant to respond to.
7.26	Applicant	**Proposed routes – Pegasus crossing** On page 126 of [APP-167] it is stated that: *The Proposed safety crossings on the Horningsea Road will utilise Pegasus Crossing status.* - Should Work No.1(c) of the dDCO [AS-139] be amended to add a reference to 'equestrian crossing'?	The Applicant notes its response as set out in APP-167 to a consultation response received from the Waterbeach and District Bridleway Association. However, the provision of a Pegasus Crossing was not ultimately taken forward as it was not considered necessary as a mitigation measure in the scheme submitted as part of the application following assessment of equestrian use on Horningsea Road. The traffic modelling undertaken as part of the environmental statement does not consider the different traffic light phasing that would arise from a Pegasus Crossing being provided. The Applicant apologises for this inconsistency and has also updated the Commitments Register submitted at deadline 1 accordingly.
7.27	Applicant	**Public rights of way – creation of a restricted byway** At page 85 of [APP-167] it is noted that CCoC requested that the status of Horningsea Public Byway No. 17/Fen Ditton Byway No. 14 be changed from a Byway to a Restricted Byway by way of the proposed DCO or a Traffic Regulation Order. SCDC also supports this (page 50 of [APP-167]). Please explain whether or not this would be possible.	There is no linkage between the proposed WWTP and the requested change of status of the Public Byway. The Applicant understands that this change of status is primarily being sought to address **existing** anti-social behaviour (ASB) associated with motorised vehicles. The proposed development is unlikely to increase such behaviour and indeed may reduce such activity due to the increased presence of staff and visitors in the vicinity. Given these considerations, the Applicant considers that it would be difficult to justify the inclusion of these powers in the DCO. However, the s.106 agreement proposed with SCDC provides for monitoring for ASB and the ability for the council to call on a financial contribution if such monitoring shows an increase in ASB arising as a result of the proposed development (see response to ExAQ 1.5 and **AS-127**).
7.28	Applicant	**Public rights of way – restoration** Para 4.2.35 of ES Chapter 11 [AS-028] refers to: *…a requirement for all PRoW to be restored to the same condition as before the works took place or to a standard which is acceptable to the Local Highway Authority which returns the paths to the same or better condition, so journey quality is unaffected once the works have been completed.* Please indicate where this Requirement can be found in the dDCO.	Whilst there is no requirement in the draft DCO (App Doc Ref 2.1) [**AS-139**] specific to restoring PRoWs to a standard acceptable to the highway authority/their previous condition, these measures are outlined in paragraph 7.6.18 of CoCP Part A (App Doc Ref 5.4.2.1) **[APP-068].** Requirement 8(1) of the draft DCO (App Doc Ref 2.1) [**AS-139**], requires that each phase must be undertaken in accordance with the code of construction practice in so far as it relates to the works proposed in the relevant phase and therefore the commitment is secured through that requirement.
7.29	Applicant, NE	**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?	The long-term application of the Landscape, Ecological and Recreational Management Plan (LERMP) (Appendix 8.14) (App Doc Ref 5.4.8.14) **[AS-066]** requires the operator to prepare a detailed landscape, ecological and recreational management plan (which is secured through Requirement 11 of the draft DCO (App Doc Ref 2.1) [**AS-139**]), based on the LERMP and which will be agreed with key stakeholders. In relation to users, this includes the requirement to complete user survey at least twice a year to understand how people are interacting with the recreational space and accessing the wider network of PRoW and permissive paths.
7.30	Applicant	**Impacts on businesses** Figure 11.8 – Businesses [AS-046] does not illustrate any businesses in the vicinity of Poplar Hall Farm. However, RR [RR-239] refers to business activities as does the RR [RR-109]. Please confirm whether or not there are any businesses within the area bounded by the River Cam, Field Lane, Horningsea Road and the A14.	Effects on agricultural businesses, such as Poplar Hall Farm are assessed in ES Chapter 6: Agricultural Land and Soils (App Doc Ref 5.2.6) [**AS-024**] and not in ES Chapter 11: Community (App Doc Ref 5.2.11) [**AS-028**], this avoids duplication of assessment. The methodology for identifying businesses within the community chapter focused on the outputs from AddressBase (supplemented with engagement) and did not identify that there are

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			any businesses in the area bounded by the River Cam, Field Lane, Horningsea Road and the A14. This is why Poplar Hall Farm is not included in Figure 11.8 of ES Book of Figures Community (App Doc Ref 5.3.11) [**AS-046**].
7.31	Applicant	**Impacts on business and residential properties – temporary access, Works 33 & 34** Para 4.2.50 of ES Chapter 11 [AS-028] states: *The Proposed Development requires temporary and permanent land. CBS Automotive, located in Clayhithe, is the only business which is affected. Temporary and permanent land requirements do not require land from private residential property, or communities facilities, so are not considered further within this assessment.* a) From the ExA's Unaccompanied Site Inspection, it appears that there might be another business immediately adjacent to CBS Automotive known as NE Joinery. This business is also listed in the Book of Reference. Would this business also be affected? b) There is a sign for 'Cambridge Car Audio' – is this a separate business from CBS Automotive? c) It also appears that a residential property shares the access with CBS Automotive (marked as 'Mulberry House' on the Land Plans [AS-151]). Please clarify. Would this access be affected? d) Please also confirm whether these parties have been directly consulted by the Applicant in respect of the Proposed Development.	The Applicant has considered community effects on the businesses at Grange Farm off Clayhithe Road (including NE Joinery). *a)* NE Joinery is located adjacent to CBS Automotive, but is not considered to be affected. Only one of the businesses at this location is affected by the Proposed Development. ES Chapter 11: Community (App Doc Ref 5.2.11) [**AS-028**] sets out in section 4.2.50 that the Proposed *Development requires temporary and permanent land. CBS Automotive, located in Clayhithe, is the only business which is affected.* b) It is the Applicant's understanding that CBS Automotive and Cambridge Car Audio are one business, just with two brand names. c) Access to Mulberry House is expected to be retained, and therefore not affected. d) The Applicant has directly consulted with both CBS Automotive/Cambridge Car Audio and NE Joinery regarding the Proposed Development and the Applicant will continue to liaise with them during the Examination.
7.32	Applicant	**Changes to amenity** Para 4.2.11 of ES Chapter 11 [AS-028] states that *Changes in amenity, which result from a combination of significant residual (post mitigation) effects reported in other assessment topics, specifically noise, vibration, odour, air quality and visual effects. For an amenity effect to be identified, at least two residual effects must combine at the same location. The assessment has not identified any residual significant effects combining at the same location. Therefore, no change to amenity is anticipated during the construction of the proposed WWTP. Therefore, the impact of change to amenity is not considered further within this aspect of the assessment.* Whilst significant effects have not been identified, have other magnitudes of impact been identified? If so, please indicate the location and magnitude of the impact(s).	The Applicant sets out the assessment methodology in section 2.2.5 of ES Chapter 11: Community (App Doc Ref 5.3.11) [**AS-028**], which states: *Amenity effects occur if there are two significant adverse effects occurring at the same location at the same time. These potential effects are noise, air quality, visual, odour or traffic effects. Only if an in-combination effects occurs will it be reported.* This methodology therefore focuses on the threshold of significant effects rather than other measures of magnitude and sensitivity.
7.33	Applicant	**Impacts on residential properties** ES Chapter 11 [AS-028] states at para 4.2.10 that These temporary and permanent land requirements are not required from community receptors, namely residential properties, community resources, non agricultural businesses or areas of formal open space and recreational parks. Therefore, the impact of temporary and permanent land requirement is not considered further within this aspect of the assessment. However, from [RR-128] it appears that the Proposed Development would use the sole vehicular access to Poplar Hall and Poplar Hall Farm. Whilst ES Chapter 11 indicates at para 2.9.6 that Communities with a minimum of 30-50 properties have formed part of this assessment, it is stated at para 2.9.5 that Amenity is very important to communities and other stakeholders at local, district, regional and national level. It appears that there may be individual properties which would not have been assessed at the community level but which could be adversely affected during the construction phase in terms of access and / or amenity. With reference to ES Figure 11.7 [AS-046] the ExA has identified the following properties for more detailed consideration: • Poplar Hall (accessed from Horningsea Road to the south of the A14); • Poplar Hall Farm (accessed from Horningsea Road to the south of the A14); • Red House Close (the dwelling on the eastern side of the River Cam approximately 150m to the southwest of Poplar Hall Farm); • Northern Bridge Farm (the dwelling on the western side of the River Cam approximately 325m to the west of Poplar Hall Farm);	The Applicant sets out the study area in Figure 11.1 within the ES Book of Figures Community (App Doc Ref 5.3.11) [**AS-046**] and is at least 500m from the Order Limits. All properties within 500m of the Order Limits have been included within the assessment, as set out in section 2.3.3 of ES Chapter 11: Community (App Doc Ref 5.2.11) [**AS-028**]. The assessment has grouped residential properties according to the community in which they are located. Therefore, a property does not need to be immediately surrounded by 30-50 properties in order to be considered. As set out in section 3.1.3 of ES Chapter 11: Community (App Doc Ref 5.2.11) [**AS-028**], whilst individual residents may self-identify with another community, this assessment has identified communities based on geographical extents within Lower Super Output Areas (geographical areas for census data; they comprise between 400 and 1,200 households and have a usually resident population between 1,000 and 3,000 persons). The private property and housing baseline in section 3.1.19 of ES Chapter 11: Community (App Doc Ref 5.2.11) [**AS-028**] sets out the residential properties included within the assessment: The closest properties to the Proposed Development, and the settlements in which they are located, are detailed further below: • Chesterton – properties located from Milton Road, Green End Road and Fen Road; • Fen Ditton – properties located from Horningsea Road (including Poplar Hall Farm), High Ditch Road, Green End and Red House Close; • Stow cum Quy – properties located from Low Fen Drove Way (including the Gate House); • Milton – properties located from Cambridge Road; • Horningsea – properties located from Horningsea High Street; • Clayhithe – properties located from Clayhithe Road; and

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		• Mulberry House (the dwelling to the south of CBS automotive on Clayhithe Road); • 'The Hamlet' and 'The Mead' to the east of Clayhithe Road, approximately 100m to the west of Clayhithe Farm; • the properties accessed from Hartridge's Lane, approximately 500m to the northeast of Clayhithe Farm; • the properties close to Bottisham Lock which are accessed from Bannold Road to the east of Long Drove; • the property to the south-east of the junction of Burgess's Drove and Bannold Road; and • properties accessed from Long Drove (which runs perpendicular to Bannold Road). Please provide a concise schedule explaining: a) any temporary (including the duration) or permanent access changes to these properties as a result of the Proposed Development; b) any amenity impacts during the construction phase; and c) whether and how impacts could be mitigated.	• Waterbeach – properties located from Station Road, Burges Road, Way Lane, Bannold Road, Long Drove, Bannold Drove and Cody Road. Therefore, the properties identified within Figure 11.7 are attributed to these settlements / communities. a) Access: Section 4.2.12 to 4.2.19 of ES Chapter 11: Community (App Doc Ref 5.2.11) [**AS-028**] identifies a temporary change to access affecting residents on Low Fen Drove Way, which is assessed to be slight adverse, but not significant as access will be maintained to properties but they may experience temporary delays due to the increased number of construction vehicles on Low Fen Drove Way. This is the only anticipated change to access affecting residents, no significant effects have been identified on properties. b) Amenity: No change to amenity is anticipated during the construction or operation of the proposed WWTP, Waterbeach transfer pipeline decommissioning of the existing WWTP. Therefore, no effects on the identified properties. c) Mitigation: The only effect to change in access associated with properties is on Low Fen Drove Way where a slight adverse but not significant effect. As set out in section 4.2.16, temporary changes to access affecting residents on Low Fen Drove Way would be mitigated by measures set out in the CTMP (App Doc Ref 5.4.19.7) **[AS-109]** and CoCP Part A (App Doc Ref 5.4.2.1) **[APP-068]**. Examples of CoCP measures include temporary traffic control during the construction period and restrictions on construction vehicle movements through the Fen Ditton and Horningsea. Examples of CTMP measures include section 4.2 (Access route strategy) requires all deliveries to be made outside of peak hours (8am-9am, 3-4pm, 5-6pm) and section 6.9 (Facilitate safe movement of users of the highway (including NMUs) requirement to provide connectivity/access to community facilities and residential properties during works. In addition, through a requirement of the Community Liaison Plan (CLP) instances of time critical works would be communicated the local community and stakeholders in advance of the works taking place including provision of information on durations, particularly where these will involve works outside of the core working hours. The table appended to this document 'Q.7.33 Impacts on residential properties - schedule', sets out a concise schedule explaining any changes in land requirement, access and amenity associated with the residential properties identified by the ExA for further consideration and how these would be mitigated.
7.34	Applicant	**Impacts on residential properties – decommissioning of the existing WWTP** Para 4.2.65 of ES Chapter 11 [AS-028] states that *No community effects are anticipated in relation to construction activities within the existing Cambridge WWTP.* Para 4.4.1 of the same document states that: *No community effects associated with the decommissioning of the existing Cambridge WWTP are anticipated. The activities within the existing Cambridge WWTP would be temporary and do not require disturbance to community receptors, namely residential properties, community resources, non-agricultural businesses or areas of formal open space and recreational parks. Therefore, decommissioning is not considered further within this aspect of the assessment.* However, it appears from ES Figure 11.7 [AS-046] that there are residential properties immediately adjacent to the existing WWTP within the Order limits on Cowley Road. Please describe the likely effects of the Proposed Development on these properties, the duration of those effects, and whether any mitigation is needed.	The Applicant reports in ES Chapter 11: Community (App Doc Ref 5.2.11) **[AS-028]** that no significant community effects on residential properties during decommissioning of the existing WWTP have been identified. The assessment of residential properties on Cowley Road considered temporary and permanent requirements for land; temporary and permanent changes to amenity and temporary changes to access. No significant effects were identified on residential properties on Cowley Road during decommissioning. Construction and decommissioning noise and vibration impacts assessed at RC16 within ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] are representative of residential receptors within the order limits on Cowley Road (18, 20 and 22 Cowley Road). Construction works affecting these sensitive receptors primarily involve temporary works at Shaft 1 and 2 including enabling activities, excavation, shaft dewatering and recovery of the micro tunnelling boring machine (MTBM). Decommissioning activities include temporary works moving through the Existing Cambridge WWTP. Construction noise and vibration impacts at RC16 are assessed to be negligible or minor adverse and **not significant**. Decommissioning noise and vibration impacts at RC16 are assessed to be negligible or minor adverse and **not significant**. Embedded mitigation measures will be implemented during construction and decommissioning phases related to these works at this location. No further mitigation is required. Residual noise and vibration effects at RC16 are negligible or minor adverse and **not significant**.

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			Construction and decommissioning impacts were assessed at three receptors (Receptor 12, 13 and 14) along Cowley road outside of the DCO limits with ES Chapter 18: Odour (App Doc Ref 5.2.18) [**AS-050**] and Appendix 18.1 (App Doc Ref 5.4.18.1) [**APP-137]**. All of these were assessed to have a 'Negligible' impact. At the identified receptors within the DCO limits, it is concluded that the odour effect is also expected to be 'Negligible' based on the frequency, intensity and duration of any effects, the source odour potential, pathway effectiveness, and sensitivity of receptors. Of particular note, when determining the receptor sensitivity in this case, the FIDOL factors have been considered and whilst the receptors identified within the DCO limits are residential, they have been assessed to be of 'medium' sensitivity due to their location, their tolerance and the expectations of the receptor with regards to odour. This is on the basis the receptor is adjacent to the existing WWTW where the is the potential for odour currently. On this basis, no further mitigation measures in addition to those included within the assessment are required. ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]** in section 4.4.7 states *EMA guidance (IEMA, 1993) notes that only links where a change in traffic flow of 30% or more has been observed needs to be assessed. The addition of the above vehicle movements on the existing road network does not constitute a 30% change (Rule 1) or a 10% change on sensitive links (the links do not include accidents black spots, conservation areas, hospitals or high pedestrian flows) and therefore no further assessment has been undertaken on these links.*
7.35	Applicant, CCC, SCDC	**Employment** RR [RR-175] states that *Anglian Water promote the benefit of a growth of 15,000 jobs at North East Cambridge should the relocation be permitted (AW 7.5). However, these employment growth targets have been identified as attainable at North East Cambridge by the Local Planning Authority in preparation for the existing Local Plan without a relocation of the Waste Water Treatment Works (SCDC CNFE 2014) and would not therefore be directly attributable to a relocation.* What is your opinion on this comment and why?	As addressed in the response to ExQ 2.11, NECAAP is being brought forward under Policy 15 of the adopted Cambridge Local Plan 2018. The NECAAP identifies that the creation of this new district will deliver 8,350 homes (40% affordable), 15,000 new jobs and a wide range of community, cultural and open space facilities (including a community garden and food growing spaces, indoor and outdoor sports facilities) on a brownfield site within the urban area of Cambridge which is recognised as "*the most sustainable location for strategic scale development available within Greater Cambridge*" (as stated in the relevant representations of both South Cambridgeshire District Council and Cambridge City Council – RR-004 and RR-002). The Proposed Development will deliver a 42 hectares brownfield site for redevelopment (and release a further 35 hectares of land) which is currently constrained to general industrial and office use on an area of land forming the gateway between Cambridge North station and the Cambridge Science Park. This specific site is identified in the Regulation 19 version of the North East Cambridge Area Action Plan (NECAAP) as having the potential to provide: - 5,500 new homes - 23,500 m^2 new business space - 13,600 m^2 new shops local services, community, indoor sports and cultural facilities - 2 primary schools and early years centres and land safeguarded for 1 additional primary school if needed (and space set aside for a secondary school if needed) Decommissioning and release of the existing WWTP site supported by the HIF funding will enable this regeneration which could not otherwise be delivered if the existing WWTP remains. The most significant benefit from this is the homes and associated community facilities, which will assist in meeting pressing housing need and support job creation and continued economic growth in the surrounding and wider Greater Cambridge area, but development of the site will also deliver direct new employment space and job growth. Whilst some new general industrial and office use could still be developed in the immediate area if the existing WWTP remains, it would make the achievement of this job growth target more difficult.
7.36	Applicant	**Employment and training opportunities for local people** On page 15 of ES Chapter 11 [AS-028] SCDC raises a question about whether the Proposed Development could provide employment opportunities for all members of society, including under-represented groups. In its RR [RR-005], SCDC welcomes the aim to maximise benefits for local residents relating to employment, supply chain contracts as well as apprenticeships and training opportunities but says that it would expect areas of Suffolk to be included within this	Everything the Applicant achieves as a business is through its people and partners. Apprentices and graduates have long been the lifeblood of Anglian Water. The Applicant is committed to continuing to provide employment opportunities associated with all of our infrastructure schemes, including the delivery of the new Waste Water Treatment Plant for Greater Cambridge. The Applicant's early careers programme for graduates, apprentices and interns helps to build its workforce of the future. The Applicant has made full use of our allocation of the Government apprenticeship levy, with a focus

ExQ1	Question to	Question	Response
		monitoring due to several communities being located within reasonable commuting distance to the Proposed Development, such as Newmarket. The Applicant says that more details around employment opportunities associated with the Proposed Development would be made available as construction planning develops. Would the Applicant be willing to enter into any formal commitment at this stage as to the inclusion of under-represented groups or people in need of training / apprenticeships / experience in the construction workforce? If so, please set out the nature of any such commitment.	on areas where employment opportunities have been limited. In 2022/23 the Applicant employed 63 apprentices, its highest-ever number, alongside eight graduates. Through the Applicant's @One Alliance (which are its partners who help deliver the infrastructure programme), it has a Training School that includes a nine-week development programme for people with little or no experience of working on a construction site. At the end of the programme the individuals will be upskilled and be ready to work permanently as part of one of the Applicant's site teams. Candidates come from a wide range of backgrounds including military leavers, ex-offenders; students not successful on other programs and we work with DWP, Jobs 22 and local charities. The Applicant works across the entire region with educational bodies, charities and local government to promote these opportunities widely. The Applicant also has a STEM (Science Technology Engineering Maths) initiative to work in our communities to promote Anglian Water, Anglian Water Alliances and the STEM opportunities that the business can offer, specifically seeking to inspire the next generation of young people to join Anglian Water and our infrastructure alliances.
7.37	Applicant	**Environmental Statement – existing WWTP** On page 9 of ES Chapter 11 [AS-028], it is reported that SCDC and CCC suggested that the following two scenarios must be 'scoped in' for the community aspect of the EIA: • the potential impacts of the existing site being decommissioned (as currently proposed) but not redeveloped; and • the potential impacts of construction lasting longer than anticipated. The Applicant's response focusses on there being a separate planning application and associated environmental impact assessment for the existing WWTP and does not respond directly to these points. The ExA also notes that the prospect of a separate planning application does not guarantee that a redevelopment scheme would be approved or implemented. Please provide a response to the two points raised by SCDC and CCC.	The ES Chapter 11: Community (App Doc Ref 5.2.11) [**AS-028**] assessed the decommissioning phase, which focused on the site being decommissioned but not redeveloped. No significant effects were identified. The findings of ES Chapter 11: Community (App Doc Ref 5.2.11) [**AS-028**] were based on the best available information on the construction programme. ES Chapter 11: Community (App Doc Ref 5.2.11) [**AS-028**] did not include sensitivity testing on different durations of the construction programme. The assessment details are provided in Section 4.4, in particular paragraph 4.4.1 states: "No community effects associated with the decommissioning of the existing Cambridge WWTP are anticipated. The activities within the existing Cambridge WWTP would be temporary and do not require disturbance to community receptors, namely residential properties, community resources, non-agricultural businesses or areas of formal open space and recreational parks. Therefore, decommissioning is not considered further within this aspect of the assessment." It is unlikely that an extended construction programme would introduce any new construction effects that would be significant. There may be an increase in the duration of identified effects due to construction activities / presence of construction vehicles over a longer period of time. It is not anticipated that an extended programme would introduce the need for any additional temporary or permanent requirement for land affecting community facilities or residential property or introduce the need for any additional requirement for diversions of routes. The duration of the effect is one component of the magnitude criteria used in the assessment. Several other factors also influence the magnitude criteria, including the proportion of the study area affected, the number of people affected, and the level of intervention required to return to the baseline position. Given all of these magnitude factors, while an extension to the construction programme may extend the duration of impacts, it unlikely that an extension to the construction programme would result in new impacts (not already identified), or result in a widening of impacts (i.e. to the study area, numbers of people affected). It is considered unlikely that an extension to the construction programme would affect the ability to return to a baseline position once construction stopped. Therefore, it is considered that overall, an extension to the construction programme is unlikely to change in the construction phase effects already identified or introduce new effects, that would result in significant effects for communities.
7.38	CCC, SCDC	**Community Liaison Plan** Is the Community Liaison Plan [AS-132] sufficiently comprehensive? If not please describe any additional measures you would wish to be included.	
7.39	CCC, SCDC, CCoC	**Equalities Impact Assessment (EqIA)**	

ExQ1	Question to	Question	Response
		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?	

8. Compulsory Acquisition (CA) and Temporary Possession (TP)

ExQ1.	Question to	Question	Response
		Compulsory Acquisition (CA) and Temporary Possession (TP)	
		Book of Reference (BoR), Statement of Reasons (SoR), Land Plans, diligent enquiry and updates	
8.1	Applicant	Please advise whether the BoR [AS-145] is fully compliant with the Department of Communities and Local Government guidance 'Planning Act 2008: procedures for the compulsory acquisition of land' (September 2013) (DCLG guidance).	The Department for Communities and Local Government Guidance: *'Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land'* ("the Guidance") sets out the requirements of the BoR at Annex D to the Guidance. This includes (in summary) that: 1. The BoR comprises five 'Parts' and relevant plans; 2. Part 1 should contain the names and addresses for service of each 'Category 1' and 'Category 2' person; 3. Part 2 should contain the names and addresses for service of each 'Category 3' person; 4. Part 3 should contain the names and addresses of all those entitled to enjoy easements or other private rights over land; 5. Part 4 should specify the owner of any Crown interest; 6. Part 5 should specify any land which could be subject to special parliamentary procedure, or which is special category land; 7. The description of each plot of land should include the area in square metres; 8. That each Part of the BoR should record persons' details even though different parts may apply to the same persons; 9. Non-prescribed parts should not be added to a BoR; and 10. The creation and acquisition of new rights should be clearly identified. The BoR should also cross-refer to the relevant articles in the dDCO. The Applicant confirms that the BoR (App Doc Ref 3.3) [**AS-145**] is compliant with the DCLG guidance.
8.2	Applicant	a. Notwithstanding Appendix 5 of the SoR [AS-143], please provide further detail / justification of how you have identified Category 3 parties for the purposes of the BoR [AS-145]. b. Are there any other persons who might be entitled to make a relevant claim if the DCO were to be made and fully implemented and should therefore be added as Category 3 parties to the BoR [AS-145]? This could include, but not be limited to, those that have provided representations on, or have interests in: - noise, vibration, smell, fumes, smoke or artificial lighting; - the effect of construction or operation of the Proposed Development on property values or rental incomes; - concerns about subsidence or settlement; - claims that someone would need to be temporarily or permanently relocated; - impacts on a business; - loss of rights, e.g. to a parking space or access to a private property; - concerns about project financing; - claims that there are viable alternatives; or - blight.	a. The Applicant has applied a multidisciplinary approach to the initial identification of potential Category 3 parties. This involved input from specialist compulsory purchase practitioners (Savills), environmental consultants (Mott Macdonald) and the Applicant's project team. As part of the identification and refinement process, the respective subject matter experts combined to: • confirm what could constitute a relevant claim; • advise on matters arising from the construction or operation of the project which may give rise to a claim; • undertake a diligent enquiry exercise on properties where a perceived claim could possibly be made; and • conclude the properties potentially impacted and the likelihood that a valid claim could be made. Subject to several statutory tests, a Category 3 claimant is entitled to make a 'relevant claim' (as defined in section 57(6) of the PA 2008) for the impact to their property interests during the construction of the works (under section 10 of the Compulsory Purchase Act 1965) and one year after the scheme has opened in connection with the operation of the works (Part 1 of the Land Compensation Act 1973).

ExQ1.	Question to	Question	Response
			In respect of impacts caused during the construction works the Applicant has considered the location of the main activity that may give rise to a claim and the type of impact. The activities that may give rise to a claim are identified as noise, dust, light pollution and air quality (see Table A5-1 of the SoR (App Doc Ref 3.1) [**AS-143**])**.** In respect of the impacts caused by the operation of the works the Applicant has again considered the location of the activity that may give rise to a claim and the type of impact. The activities identified that may give rise to a claim are odour, noise and light pollution (see Table A5-2 of the SoR (App Doc Ref 3.1) [**AS-143**]). In relation to the statement by the co-owner of Poplar Hall regarding "light pollution" during the Open Floor Hearing on 17 Ocotber 2023, the Applicant comments as follows. Receptors LR10 and LR11 identified within Appendix A – Lighting receptor and environmental zone plan of ES Chapter 15 Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [**AS-100**] are the closest to Poplar Hall. The assessment reported within this document identifies that, for these receptors, following mitigation, the residual effects are none/negligible. Having reviewed the activities and the potential impacts the Applicant has then considered the potential for parties to make a claim for compensation and where relevant included them with the Category 2 or 3 in the BoR (App Doc Ref 3.3) [**AS-146**]. b. The Applicant undertook diligent inquiry to identify the parties in Part 2 of the BoR (App Doc Ref 3.3) [**AS-146**] who would, or might be entitled to, make a relevant claim. The Applicant does not consider there are any further parties who need to be included. In any event, the Applicant notes that the following matters listed in the question are not circumstances which could give rise to a 'relevant claim': • claims that someone would need to be temporarily or permanently relocated; • impacts on a business – in this respect the Applicant notes that a claim must be in respect of a diminution in value of the claimant's land interest. This does not include business losses; • concerns about project financing; • claims that there are viable alternatives; or • blight.
8.3	Applicant	The Land Plans [AS-151] indicate which plots would be subject to TP only. However, does the Applicant intend for all plots to be subject to TP and if so, where is this provided for in the dDCO and within the SoR / BoR?	Those parcels which are coloured green on the Land Plans (App Doc Ref 4.4) [**AS-151**] are not subject to powers of compulsory acquisition and are proposed to be subject to powers of temporary possession only in accordance with Article 35(1)(a)(i) of the dDCO. Article 35(1)(a)(ii) permits the Applicant to take temporary possession of any of the remainder of the Order Land in connection with the carrying out of the authorised development. This applies to any of the Order Land coloured pink, blue or brown on the Land Plans, as explained by the Applicant in Table 2.1 and paragraphs 2.1.3-2.1.6 of the BoR (App Doc Ref 3.3) [**AS-146**], and in paragraphs 1.6.8 and 1.6.9 of the SoR (App Doc Ref 3.1) [**AS-143**]. Paragraphs 6.5.6 and 6.5.7 of the SoR (App Doc Ref 3.1) [**AS-143**] also explain how the Applicant may rely on the powers in Article 35 to take temporary possession of land for the purposes of constructing the authorised development in advance of the exercise of compulsory acquisition powers so as to seek to minimise the extent of permanent acquisition of land and rights.

ExQ1.	Question to	Question	Response
8.4	Affected Persons/IPs	Are any Affected Persons or Interested Parties aware of any inaccuracies in the BoR [AS-145], SoR [AS-143] or on the Land Plans [AS-151]? If so, please set out what these are and provide the correct details.	A response from the Applicant is not required.
8.5	Applicant	Please summarise where you have not yet been able to identify any persons having an interest in the land, including any rights over unregistered land. What further steps will you be taking to identify any unknown rights during the Examination?	Other than parcels of land which are roads/droves, watercourses or ditches, there are two parcels (056b, 056d (two parts of the same field) and 061a which are unregistered. See Sheets 9 and 10 of the Land Plans (App Doc Ref 4.4) [**AS-151**] for the location of these parcels. Through the process of diligent enquiry, and engaging with landowners, the Applicant has ascertained who owns the land. Notwithstanding that information, the Applicant carried out the following in relation to unregistered land to identify the owners. • On site notices left as part of the requirements under s44, s48, s56 and s57 of the PA2008 • Publicity of the Proposed Development and Application as part of the requirements under s4 of the Planning Act 2008 • Analysis of information from the Land Registry relating to owners of adjacent properties, to see if any likely pattern of landownership can be established and verified • Regular contact with other landowners and occupiers during which enquiries were made about unregistered land The Applicant will continue with its diligent enquires during the Examination to try to establish the owners of unregistered land. In the event of finding additional landownership information, the Applicant will update the BoR and submit it to the ExA at each required Deadline. The Applicant will also inform any such persons of their rights to apply to become an Interested Party under section 102A PA 2008. The Applicant also refers the ExA to the answer to ExQ1.8.6.

ExQ1.	Question to	Question	Response
8.6	Applicant	Please provide further detail as to how diligent enquiry has been carried out, noting that there are a numerous 'unknown' interests in Part 1 and Part 3 the BoR [AS-145] (e.g. Plot 001a amongst many others) and numerous entries such as 'The Owner', 'The Occupier', or 'The Leaseholder' in Part 2 of the BoR?	The Applicant has carried out diligent enquiry as set out in Appendix 5 Of the SoR (App Doc Ref 3.1) [**AS-143**]. This process has produced information which has required the inclusion of "Unknown" or "The Occupier" entries in the BoR (App Doc Ref 3.3) [**AS-146**]. The reasons for this are described below. In relation to Part 1 of the BoR (App Doc Ref 3.3) [**AS-146**], some of the "Unknown" entries (for example, parcel 007a (see Sheet 2 of the Land Plans (App Doc Ref 4.4 [**AS-151**])) have been included because, despite a landowner confirming their landownership, there is no documentary evidence for the Applicant to rely on, and so a precautionary approach has been taken by including an "Unknown" entry. Other entries of this type are the result of the land being unregistered, with the owner being untraceable. Please see the answer to ExQ8.5. Land interests under roads and rivers, for example parcels 007a or 019b, are likely to be unregistered. In these scenarios, when including the landownership information in the BoR (App Doc Ref 3.3) [**AS-145**], the Applicant has applied the usual presumption that the owners of land abutting these areas are the owners of the subsoil under either the relevant road (to the centre line) or watercourse (to its mid-point). This is a rebuttable presumption therefore in the absence of a registered title the Applicant has also included an 'Unknown' entry in the ownership column. The Applicant tried to make contact with adjoining landowners, placing site notices in order to find the landowner of the unregistered land. In relation to Part 2 of the BoR (App Doc Ref 3.3) [**AS-146**], the majority of "The Owner" entries are as a result of the address for the Proprietor of the title, according to the Land Registry, being different to the property address. As a result, the Applicant serviced s47 and s56 notices on "The Owner" at the property. Where service of these notices could not be confirmed using the postal system, notices were hand delivered by the Applicant. Other entries of this type will be as a result of the land being unregistered, with the owner being untraceable. Please see the answer to ExQ8.5. The "Unknown" entries in Part 3 of the BoR (App Doc Ref 3.3) [**AS-146**] relate to a specific situation of changes of the names of Category 2 interests where the information held at the Land Registry does not give categorical information regarding the party. As a result, the Applicant placed a notice on site to ask the owner to make contact with the Applicant.
8.7	Applicant	Please ensure that the BoR [AS-145], SoR [AS-143] and Land Plans [AS-151] are: a. Kept fully up to date with any changes and the latest versions submitted at the deadlines shown in the Examination timetable together with an explanation of the reasons for each change; b. Supplied in two versions (clean and track changed) at each deadline; c. Supplied with unique revision numbers that are updated consecutively from the application versions, clearly indicated within the body of each document and included within the electronic filename; and d. The dDCO [AS-139], including relevant Schedules, is updated accordingly.	The Applicant notes the requests and confirms it will produce the necessary documents.
8.8	Applicant	What assurance and evidence can the Applicant provide of the accuracy of the land interests identified as submitted and can the Applicant indicate whether there are likely to be any changes to the land interests, including the identification of further owners / interests or monitoring and update of changes in interests?	The Applicant has carried out diligent enquiry, as set out in section 7.3 and Appendix 1 of the SoR (App Doc Ref 3.1) [**AS-143**] to identify the information contained within the BoR (App Doc Ref 3.3) [**AS-146**]. In addition, since 2020, the Applicant has activity engaged in discussions with the landowners and occupiers within the Order Limits to arrange access for surveys and take forward negotiations for options to acquire, by agreement, the land and interests in land necessary for the Proposed Development. This engagement has allowed the Applicant, via its land team, to review and verify landownership information. The Applicant, via its appointed land referencers (Savills) will continue to ensure that the BoR is kept up to date both through that engagement with landowners and their appointed advisors, and through conducting refreshes of the Land Registry data.

ExQ1.	Question to	Question	Response
			This forms part of the diligent enquiry process the Applicant is continuing to carry out (see Appendix 5 of the SoR (App Doc Ref 3.1) [**AS-143**] to identify any changes to landowners and interests. This process is a combination of obtaining refreshed data from the Land Registry to show any changes in ownership of registered property with the Order Limits. The Applicant's land team continues to have regular contact with landowners and occupiers, which allows them to verify land ownership on a regular basis. In addition, the communication channels in various documents and on the Applicant's project website have been monitored, and any communication has been followed up to see if owners of unregistered land can be identified. The Applicant envisages that there will continue to be changes to the ownership and occupation of the Order Land during the Examination. The Cambridge area in general has an active property market and there is ongoing development/refurbishment of properties around the Order Limits. The Applicant's land team has actively and regularly monitored these areas, which contain some of the properties identified for the purposes of Category 3 (see ExQ 8.2) and will continue to do so. Where new or changes in landownership are identified, the Applicant will write to the party to inform them about the Application and to make t any such persons aware of their rights to apply to become an Interested Party under section 102A PA 2008.
8.9	Applicant	Do you envisage any further proposed changes to the application, including any which might engage The Infrastructure Planning (Compulsory Acquisition) Regulations 2010?	In response to matters raised at ISH1, the Applicant has made a change to the land parcels and type of acquisition power sought in the vicinity of the proposed outfall structure (parcel 019a in particular (see Sheet 2 of the Land Plans (App Doc Ref 4.4.2) [**AS-151**]). See ExQ1.8.36 and ExQ1.10.10 for further details. No 'additional land', within the meaning of regulation 4 of the Infrastructure Planning (Compulsory Acquisition) Regulations 2010, is proposed by the change, therefore the Infrastructure Planning (Compulsory Acquisition) Regulations 2010 are not engaged. The Applicant does not envisage any other proposed changes to the Application which might engage the Infrastructure Planning (Compulsory Acquisition) Regulations 2010.
8.10	Applicant	Please provide detailed information on the status of negotiations with all Affected Persons given that the ExA should be satisfied that the Applicant has engaged with all Affected Persons with a view to acquiring their land interests by agreement. This information can be included in the Compulsory Acquisition Schedule and Statutory Undertakers Progress Schedule (see below).	The Applicant has prepared a Compulsory Acquisition Schedule (in the form requested by the ExA) setting out the status of negotiations with all Category 1 parties, together with details and status of any Relevant Representations made by parties contained within the BoR (both documents are included in the Applicant's Deadline 1 submission). The Applicant has not included Parties within Category 2 or Category 3 in the Compulsory Acquisition Schedule (except where such a person has submitted a relevant representation) because the Applicant does not seek the acquisition of land (or rights over land), or the use of land, from those parties. A number of affected parties are statutory undertakers and, as such, the Applicant is progressing negotiations in respect of protective provisions and land agreements where applicable. A summary of progress in these negotiations is set out in the Statutory Undertakers Progress Schedule (in the form requested by the ExA) (included in the Applicant's Deadline 1 submission).
		How is it intended to use the land, whether reasonable alternatives have been explored and whether the rights sought are legitimate, proportionate and necessary	
8.11	Applicant	To assist with the consideration of whether the extent of the land to be used temporarily is no more than is reasonably required for the purposes of the Proposed Development, please provide further details to justify the extent of the land sought to be used temporarily.	The Applicant has taken a proportionate approach to the proposed permanent acquisition of land and new rights within the Order Limits. As part of that approach, it has not sought permanent powers of acquisition over land that is only required temporarily. Land that is required temporarily only is shown coloured green on the Land Plans (App Doc Ref 4.4.2) [**AS-151**] and is identified in Schedule 12 to the dDCO. The extent of the green temporary possession only land has been identified having regard to the Works Plans (App Doc Ref 150) [**AS-150**] and the areas where only temporary works or activities are proposed. The Applicant

ExQ1.	Question to	Question	Response
			has minimised the land to be occupied temporarily, which comprises no more land than is required for those temporary construction activities. The Applicant has produced a table showing the details of each parcel to be occupied temporarily, the relevant Works Nos, a description of the activity to take place in the parcels and an estimate of the duration of temporary occupation. The Temporary Land Possession Table (included in the Applicant's Deadline 1 submission). The Applicant therefore considers that the extent of the land required to be used temporarily only is necessary for the authorised development and justified.
8.12	Applicant	Article 35(9) (a) and (b) of the dDCO [AS-139] appear to provide for the CA of rights over land / CA of subsoil in respect of plots identified for TP only (as set out in Schedule 12 of [AS-139] and as identified on the Land Plans [AS-151] in green). Please justify such powers, clarify to what extent persons affected are likely to be aware of this and confirm whether the powers sought are reflected in the BoR [AS-145] and SoR [AS-143]?	The Applicant notes this was discussed at ISH1 and refers the ExA to the Applicant's response to ExQ1.10.9 which explains that an amendment has been made to Article 35(9) of the DCO to remove the ability to compulsorily acquire any part of the land coloured green on the Land Plans [AS-151] which is identified for temporary possession only.
8.13	Applicant	Section 7.2 (amongst other sections) of the SoR [AS-143] states that there is a compelling case in the public interest for CA. Please address the following: a. What assessment, if any, has been made of the effect upon individual Affected Persons and their private loss that would result from the exercise of CA powers in each case; b. How has it been demonstrated within the application that the public benefits of the scheme would outweigh any residual adverse effects including private loss suffered by individual landowners and occupiers; and	The Statement of Reasons (App Doc Ref 3.1) [**AS-143**] sets out that the Applicant is satisfied that the conditions in s122 of the Planning Act 2008 (the Act) are met and that tests within the Compulsory Acquisition Guidance are satisfied, and there is a compelling case in the public interest for the Compulsory Acquisition identified as necessary to deliver the scheme. All the land subject to compulsory acquisition powers is required for the purposes of the Proposed Development,
8.14	Applicant	Section 7.7 of the SoR [AS-143] addresses human rights. (a) Please provide a more detailed demonstration that interference with human rights in this case would be proportionate and justified; and (b) Explain how the proportionality test has been undertaken and how this approach has been undertaken in relation to individual plots?	(a) As explained in paragraph 7.7.9 of the Statement of Reasons [AS-143], whilst compulsory acquisition may deprive owners and occupiers of their land interest, such an infringement of human rights is authorised by the law provided that the statutory procedures for making the DCO are followed and there is a compelling case in the public interest for the inclusion of powers of compulsory acquisition, and the interference with private rights is justified. The statutory requirements for making the DCO have been followed, including the statutory consultation requirements, as explained in the Consultation Report (App Doc Ref 6.1) [**AS-115**]. All Affected Persons have had an opportunity to make representations in respect of the DCO. The need for and benefits of the Proposed Development are set out within the Statement of Reasons (APP-143) and in other Application documents including the Planning Statement (App Doc Ref 7.5) [**AS-128**]. Together, they demonstrate that there is a very strong and compelling case in the public interest for the Proposed Development to be delivered. The land identified as being required for the scheme has been based on environmental and engineering requirements and is the minimum necessary to construct, maintain and protect the Proposed Development. The purpose for which each plot of land is required legitimate and is set out within Appendix 3 to the Statement of Reasons. As explained in response to ExQ1.8.13, the impacts of the proposed compulsory acquisition and/or temporary possession of land on Affected Persons are limited, with no displacement or extinguishment of businesses proposed and no acquisition of residential properties. The Applicant considers that impacts on Affected Persons are all compensatable under the Compensation Code, which has been held to be compliant with the ECHR. (b) Proportionality cannot be looked at solely on an individual plots basis because the compulsory rights sought are justified by the whole of the Proposed Development, not individual elements of it. The Planning Act 2008:

ExQ1.	Question to	Question	Response
			procedures for the compulsory acquisition of land guidance at paragraph 14, provides that "*In determining where the balance of public interest lies, the Secretary of State will weigh up the public benefits that a scheme will bring against any private loss to those affected by compulsory acquisition*" (emphasis added). The Applicant has, as part of settling the Order Limits, Works Plans(App Doc Ref 4.3) [**AS-150**] and Land Plans (App Doc Ref 4.4 [**AS-151**], reviewed each plot individually in order to challenge the extent of the proposed land take and the proposed type of acquisition sought, and to refine the proposals where possible to either reduce the area of land required or limit the type of compulsory intervention. This plot-by-plot review included consideration of the following. • The requirement for the land to ensure that only land necessary for the Proposed Development was included within the Order Land, and that wherever possible, the proposed acquisition allowed for the continued use of retained land. • Review of the land use and ownership of land, including any development proposals, to consider the impacts of acquisition and/or temporary possession of the land on landowners and occupiers within the Order Land and its neighbours. • Where practicable, to have regard to existing ownership or physical boundaries, and to make use of existing access roads and tracks. • Reducing severance so as to avoid inaccessible or unworkable areas of land during construction or operation of the project. • The proposed approach of undertaking the majority of the works under temporary possession powers where possible so that the exercise of permanent powers of acquisition is minimised. • Feedback from engagement and consultation with Affected Parties, leading to design changes. For example, the position of Shaft 4 of the Transfer Tunnel (Work No 27 - Transfer Tunnel (see Works Plans (App Doc Ref 4.3) [**AS-150**]) was moved from its original position to the west of a hedge running approximately north/south in the Red House Close area, to the east of the hedge. This reduced the proximity of the shaft, which will be a temporary construction site, and so mitigated the impact on residents. The above process weighed the requirement for individual plots against the anticipated impacts of the proposed acquisition and the Proposed Development. The Applicant is satisfied that the powers of compulsory acquisition and temporary possession sought through the dDCO are necessary, proportionate, and justified.
8.15	Applicant	For the avoidance of doubt, please set out all the factors that are regarded as constituting evidence for a compelling case in the public interest for the CA and TP powers sought and where, giving specific paragraph references, are these set out in the submitted documentation?	The Applicant considers the factors constituting evidence for a compelling case in the public interest for the confirmation of powers of compulsory acquisition and temporary possession are as follows. The positive benefits generated by the enabling of the Hartree development (see paragraph 11.1.3 of the SoR (App Doc Ref 3.1) [**AS-143**], which will include the delivery of 8,350 homes, 15,000 new jobs and a wide range of community, cultural and open space facilities as part of North East Cambridge (see paragraph 2.1.3 of the Planning Statement Planning Statement (App Doc Ref 7.5) [**AS-128**]. In addition, the Applicant considers the Proposed Development will deliver ecological and amenity benefits as described in the Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14 [**AP-098**] and Environmental Statement - Volume 2 - Chapter 8 – Biodiversity (App Doc Ref 5.2.8) [**AS-026**].

ExQ1.	Question to	Question	Response
			In the Site Selection Reports (App Doc Refs 5.4.3.2 to 5.4.3.4) [**AS-075** to **AS-078**] reasonable alternatives to compulsory acquisition have been explored (in accordance with paragraph 8 of the Planning Act 2008 Compulsory Acquisition Guidance). In the Compulsory Acquisition Schedule (included in the Applicant's Deadline 1 submission). The Applicant has also shown it has, and will continue to, negotiate with relevant landowners to agree options to acquire the land and rights in land necessary for the Proposed Development. The s35 direction by the Secretary of State (Appendix 3 of the Planning Statement (App Doc Ref 7.5) [**AS-128**]) means the interference with rights associated with the Proposed Development is for a legitimate purpose and is necessary, as required by paragraph 8 of the Compulsory Acquisition Guidance). All of the land is required for, or is required to facilitate, the development for which development consent is sought (as required by section 122(2) of the Planning Act 2008). The use of powers is proportionate because the type of land to be acquired is mainly agricultural, without the need for the acquisition of freehold residential land. The use of powers is also proportionate because the extent of land to be acquired has been minimised and changes made to the design of the Proposed Development as a result of consultation with landowners (see ExQ1.8.19(2)). The land to be acquired is no more than is reasonably required for the purposes of the development (as required by paragraph 11 of the Compulsory Acquisition Guidance). In the Compulsory Acquisition Schedule (included in the Applicant's Deadline 1 submission) the Applicant has set out the current status of the negotiations undertaken with landowners. These negotiations are ongoing and will be progressed during the Examination period (as required by paragraph 25 of the Compulsory Acquisition Guidance) In section 5.2 of the SoR (App Doc Ref 3.1) [**AS-143**], the Applicant has a clear idea of how it intends to use the land (or rights/restrictions over land) which will be subject to the powers of compulsory acquisition and temporary possession (as required by paragraph 9 of the Compulsory Acquisition Guidance). In the Funding Statement (App Doc Ref 3.2) [**AS-013**] an explanation has been provided as to how it is expected that the construction of the Proposed Development and the acquisition of the land or rights over the land will be funded, as well as compensation arising from the exercise of powers of compulsory acquisition (as required by paragraphs 17 and 18 of the Compulsory Acquisition Guidance). Subject to the making of the Order, there are no known impediments to the delivery of the Proposed Development (as required by paragraph 19 of the Compulsory Acquisition Guidance). The Applicant would make the following points. • The HIF Agreement is in place (see paragraph 3.1.5 of the Funding Statement (App Doc Ref 3.2) [**AS-013**]) • The Master Developemnt Agreement is in place (see paragraphs 1.4.6 and 1.4.7 of the Funding Statement (App Doc Ref 3.2) [**AS-013**]) • There is an emerging policy framework North East Cambridge/Hartree which is advancing (see the Planning Statement (App Doc Ref 7.5) [**AS-128**]) • The ExA heard the support from Mr Peter Denton of Homes England during ISH2 • Cambridge City Council has signaled its "in principle support to the DCO application and the proposed development for the project" (paragraph 3.9 of Cambridge City Council's Local Impact Report • The Applicant is in discussions with the Environment Agency about the early submission of permits under the EPR Regime and where necessary is utilising the enhanced pre-application process As a result, the Applicant sees no reason why the other consents in the consents schedule will not be secured.

ExQ1.	Question to	Question	Response
			Section 7.7 of the SoR (App Doc Ref 3.1) [**AS-143**] sets out how Article 1 of the First Protocol to the ECHR and Articles 6 and 8 of the ECHR have been considered. This, together with other parts of the Application, sets out how the outputs and benefits which will be realised by the Proposed Development will outweigh the private loss that would be suffered by those whose land and/or interests are to be subject to compulsory acquisition (as required by paragraph 13 of the Compulsory Acquisition Guidance). The Applicant considers confirmation of the powers of Compulsory Acquisition and Temporary Possession in the Draft Development Consent Order ((App Doc Ref 2.1) [**AS-008**]) are necessary to ensure the Proposed Development can be delivered within a reasonable timescale. Without compulsory acquisition powers, the Order Land could not be assembled, and the Proposed Development would not proceed.
8.16	Applicant, CCC, SCDC	Please clarify why it is proposed to first connect the Waterbeach pipeline to the existing WWTP before diversion to the proposed WWTP, rather than just connecting to the proposed WWTP in the first place. How would this arrangement satisfy the conditions under s122 of PA2008?	*Waterbeach New Town, A Spatial Framework and Infrastructure Delivery Plan, Supplementary Planning Document*, was adopted in February 2019 by South Cambridgeshire District Council. It sets the planning policy context for Waterbeach New Town delivering 11,000 homes and associated development between 2019 and 2030 (see Planning Statement (App Doc Ref 7.5) [**AS-128**]**.** The requirement to treat waste water flows from Waterbeach New Town was included in the Secretary of State's s35 direction in relation to the Cambridge Waste Water Plant Relocation Project (see Appendix 3 of the Planning Statement (App Doc Ref 7.5) [**AS-166**])**.** As such, the Applicant is obliged to ensure it is capable of fulfilling its obligations regarding the treatment of waste water flows from Waterbeach New Town. The timing of development being delivered as part of Waterbeach New Town is uncertain. As a result, the timing of the need for treatment capacity in addition to that available at the existing Waterbeach Water Recycling Centre is not certain at the moment. There is, however, the potential for the existing Waterbeach Water Recycling Centre not having enough capacity to treat the waste water flows from Waterbeach New Town. As a result, within the design of the Proposed Development, the Applicant must include the ability to transfer waste water flows from Waterbeach New Town to the existing WWTP for treatment before the new WWTP is operational. This is the reason for including the Waterbeach Rising Main South (Works Nos 36 (see Works Plans (App Doc Ref 4.3) [**AS-150**])) as a necessary part of the Proposed Development for which development consent is sought. New rights and restrictive covenants are sought by the Applicant to enable the construction, operation, maintenance and protection of Waterbeach South. The Applicant considers that the authorisation of the compulsory acquisition of those new rights and restrictive covenants is required for the development to which the development consent relates in accordance with the conditions in section 122(2) of the PA 2008. Works No 35 (see Works Plans (App Doc Ref 4.3) [**AS-150**]) is the Waterbeach Pipeline Spur to Terminal Pumping Station. When the new WWTP is operational, this would allow waste water flows from Waterbeach New Town to be diverted from reaching the existing WWTP for treatment to the new WWTP. The inclusion of this Work No 35 in the Project Description (App Doc Ref 5.2.2) [**AS-034**] is correct as it facilitates the treatment of waste water flows from Waterbeach New Town, as required by the Secretary of State's s35 direction (see Appendix 3 of the Planning Statement (App Doc Ref 7.5) [AS-128]). The Waterbeach Pipeline Spur to Terminal Pumping Station (see Works Plans (App Doc Ref 4.3) [**AS-150**]) will be located with land parcel 038a (see Sheet 3 of the Land Plans (App Doc Ref 4.4) [**AS-151**]). As such, it will be part of the infrastructure within the boundary of the new WWTP. The Applicant considers the inclusion of the Waterbeach Pipeline Spur to Terminal Pumping Station satisfies the s122 tests.

ExQ1.	Question to	Question	Response
8.17	Applicant	There is currently no statutory requirement for BNG for projects considered under PA2008. The application indicates that 20% BNG would be provided and this is reflected in R11 of the dDCO [AS-139]. a. What is the amount of land required and subject to CA / TP to provide the 20% BNG; and b. If this is not a statutory requirement, how would it satisfy the conditions under s122 of PA2008 (noting that some RRs mention this also (e.g. [RR-028 and RR-192]))?	a. Whilst there is proposed for be BNG provided on the site of the proposed WWTP (Plots 36a and 38a), this provision is intrinsically integrated into the Landscape Masterplan, and will be weaved into landscaping and design of the WWTP's sculpted circular Earth Bank, as explained in paragraph 2.1.3 to 2.1.7 and section 3.4 of the Landscape, Ecological and Recreational Management Plan (LERMP) [**AS-066**]. It is not therefore possible to identify distinct areas of land required for BNG purposes other than in respect of Plot 021b. As such, the Applicant's response to this question focuses on the requirement to compulsorily acquire Plot 021b. The Applicant's current estimate for the land required permanently for the provision of both the ecological mitigation and Biodiversity Net Gain (BNG) as part of Works Plan 32 (Outfall) is approximately 1.04 hectares. The provision of these two items within Plot 021b is interwoven because the design of the habitat required to mitigate the impact on the existing water vole habitat provides the optimum location and design for the provision of the BNG required as a result of the construction of the Final Effluent Outfall. In addition, Principles 6 and 7 of the Biodiversity Metric 3.0, Principle 7 *Compensation habitats should seek, where practical, to be local to the impact* requires BNG to be provided close to the area of impact, and so the co-location of the two elements within parcel 021b (see Sheet 2 of the Land Plans (App Doc Ref 4.4.2) [**AS-151**] is justified. 345m of ditches will be created in the area of Works Plan 39, but as Chapter 8 of the Applicant's Environmental Statement [**AS-026**] explains, there is the need to mitigate the loss of water vole habitat in the vicinity of the pipeline outfall into the river Cam through the creation of wet ditches. 84m of those ditches are therefore required for replacement water vole habitat, rather than biodiversity net gain (although the 84m contributes to BNG). Please see the Applicant's response to ExQ1.5.24 for a table which sets out the proposed ecological mitigation, compensation and enhancement measures in detail. Use of the mitigation land within Plot 021b for other purposes would be incompatible with the habitats that will have been established, therefore in order to control, protect and manage the mitigation and habitat creation, the Applicant requires the freehold ownership of that land. It should be noted, as is explained in the BNG Report (ES Appendix 13) (App Doc Ref 5.4.8.13) [**AS-163**] that the Applicant is not providing 20% net gain on site in respect of the river units. This is due to the loss of high distinctiveness river units (as a result of increased riparian encroachment due to the new outfall) which cannot be delivered on site because it would give rise to a 'trading down' of the high distinctiveness habitats. Therefore, it is proposed that 0.04 river units will be delivered off-site. Further explanation as to how these river units will be secured is provided in the Applicant's response to ExQ1.5.27. ExQ1.8.28 confirms that the cost of purchasing those river units has been taken account of in the funding of the Proposed Development. b. Whilst the statutory requirement to deliver BNG pursuant to the Environment Act 2021 does not apply to the Proposed Development, there is planning policy support for the 20% BNG target, as explained further in the Applicant's response to ExQ1.5.25. These objectives were also reflected in the scoping responses from a number of stakeholders (see page 23 of ES Chapter 8 [APP-040]) including that from Greater Cambridge Shared Planning which challenged the Applicant to meet a 20% target so as to meet the Natural Cambridgeshire target of doubling the amount of land managed for nature (paragraph 5.5.26, Greater Cambridgeshire draft Biodiversity Supplement Planning Document – consultation 2021). The Applicant's commitment to 20% BNG is also supported by the Environment Agency (see RR-013).
	No number	**Individual objections, issues and agreements**	

ExQ1.	Question to	Question	Response
8.18	Affected Person	Does any Affected Person have any concerns that they have not yet raised about the legitimacy, proportionality or necessity of the compulsory acquisition or temporary possession powers sought by the Applicant that would affect their land or their rights in land?	The Applicant notes the ExA are inviting supplemental comments to Relevant Representations. The Applicant wishes to reserve the right to respond.
8.19	Applicant	Please complete the Compulsory Acquisition (CA) / Temporary Possession (TP) Objections Schedule (CA Schedule) (at Annex A of this document) and make any entries you believe would be appropriate, taking account of the positions expressed in RRs, and giving reasons for any additions. As the Examination progresses and at each successive deadline, please update the CA Schedule as necessary.	The Applicant has produced a Compulsory Acquisition Schedule (included in the Applicant's Deadline 1 submission) which includes details of any objections and relevant comments made in Relevant Representations. This will be updated at each successive deadline.
8.19(2) Not numbered by the ExA.	Applicant	In the light of the DCLG guidance, in particular para 8, please describe: a. How the ExA can be assured that all reasonable alternatives to CA (including modifications to the scheme) have been explored; and b. Set out in summary form, with document references where appropriate, what assessment / comparison has been made of the alternatives to the proposed acquisition of land or interests in each case.	a. The Applicant does not have the benefit of owning any land, or having any land under its control, within the Order Limits, save for the site of the existing WWTP (see Sheet 1 of the Land Plans (App Doc Ref 4.4) [**AS-151**]). The Site Selection Reports (App Doc Refs 5.4.3.2 to 5.4.3.4) [**AS-075** to **AS-078**] set out the methodology used to assess alternative sites for the location of the new WWTP and the potential routes of the necessary connecting pipes and tunnels. The results of the site selection process settled the location of the land required for the Proposed Development. (App Doc Ref 5.4.3.5) [**AS-078**]. None of the alternative sites or routes which were considered would have obviated the need for the compulsory acquisition of land for the Proposed Development. The Applicant also consulted on the site selection process. The results of that consultation can be found in the Consultation Appendix Site Selection Report (App Doc Ref 6.1.15) [**AS-179].** Having selected the proposed location for the Proposed Development, the Applicant engaged in discussions with the owners of land identified as being needed for the Proposed Development. Those discussions sought to agree the acquisition of land and rights by negotiation. The current status of those discussions is set out in the Compulsory Acquisition Schedule (included in the Applicant's Deadline 1 submission). It should be noted that alternative land within the vicinity of the Order Limits was not offered to the Applicant, for the new WWTP, tunnel or pipeline routes. In addition, the Applicant has consulted upon and discussed the location of various elements or parts of the Proposed Development with landowners and occupiers. Where possible, as part of the design evolution of the Proposed Development, the Applicant has amended elements of design and/or land requirements, which are explained further in the Applicant's response to part b below. In relation to the land the Applicant owns at the existing WWTP, that land will be used for the delivery of Hartree, which is enabled by the Proposed Development, as described in the Planning Statement Planning Statement (App Doc Ref 7.5) [**AS-128**]. As a result, this land is not available for the Proposed Development, other than the land which will contain the Waterbeach Pipeline South Pipeline (Works Nos 36 (see Works Plans (App Doc Ref 4.3) [**AS-150**], the Waste Water Transfer Tunnel (Works Nos 27 (see Works Plans (App Doc Ref 4.3) [**AS-150**]. The Applicant has therefore assessed all reasonable alternatives to compulsory acquisition and concludes that no such alternatives exist. b. As explained in a. above, the site selection process considered alternatives for the location of the new WWTP and the connecting pipes and tunnel. As described in the Environmental Statement - Volume 4 - Chapter 3 - Appendix 3.5 Stage 4 Site Selection Report – Final Site Selection (App Doc Ref 5.4.3.5) [**AS-078**], Community assessment Land take, property and business viability was one of the Community Assessment criteria used to
		Statutory Undertakers	

ExQ1.	Question to	Question	Response
8.20	Applicant Cadent Gas Limited, Network Rail Infrastructure Limited, National Highways, CCoC	The BoR [AS-145] includes several Statutory Undertakers with interests in land and equipment that would be affected by CA / TP. **The Applicant:** a. Provide a progress report on negotiations with each of the Statutory Undertakers listed in the BoR, with an estimate of the timescale for securing agreement with them; b. Indicate whether there are any envisaged impediments to the securing of such agreements; and c. State whether any additional Statutory Undertakers have been identified since the	To answer parts a) and b) of this question, the Applicant has produced a Statutory Undertakers Progress Schedule which can be found at (included in the Applicant's Deadline 1 submission). In relation to part c) of the question, the Applicant has not identified any additional Statutory Undertakers since the submission of the BoR (App Doc Ref 3.3) [**AS-145**] and so there are no additional entries in this respect contained within the BoR (App Doc Ref 3.3) [**AS-145**] submitted as part of the Applicant's Deadline 1 submission.
		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.	This question is not addressed to the Applicant.
8.21	Applicant	The Applicant is requested to review the RRs and subsequent Written Representations made by any Statutory Undertaker as the Examination progresses and at each successive deadline update, as necessary, a table identifying and responding to any representations made by Statutory Undertakers with land or rights to which s127 and / or s138 of PA2008 applies (Statutory Undertakers Progress Schedule – which could form part of the CA Schedule). Where such representations are identified, the Applicant is requested to identify: a. An up-to-date list of Statutory Undertakers; b. The nature of their undertakings; c. The Statutory Undertaker's land, rights or apparatus that would be affected and how it would be affected; d. The progress made in discussions with Statutory Undertakers since the last update in relation to the tests set out in s127(3)(a) or (b), s127(6)(a) or (b) and s138(4) of PA2008 and why these apply; and e. Any agreement or differences between the Applicant and the Statutory Undertaker about whether the tests have been met, the next steps to be taken, and the progress anticipated by the close of the Examination; f. In relation to these matters, whether any protective provisions and / or commercial agreement are anticipated, and if so: • whether these are already available to the ExA in draft or final form; • whether a new document describing them is attached to the response to this question or • whether further work is required before they can be documented; and g. In relation to a Statutory Undertaker named in an earlier version of the table but in respect of which a settlement has been reached: • whether the settlement has resulted in their representation(s) being withdrawn in whole or part; and • identifying any documents providing evidence or agreement and withdrawal. The above information will be published on the project page of the National Infrastructure website, so commercial and / or confide	The Applicant has reviewed any RR made by Statutory Undertakers and will review any Written Representations made by Statutory Undertakers during the Examination. The Applicant has produced a table (included in the Applicant's Deadline 1 submission) identifying and responding to any representations made by Statutory Undertakers with land or rights to which s127 and/or s128 applies (Statutory Undertakers Progress Schedule), containing the information listed a. to q. in ExQ1.8.21. This is separate to the Compulsory Acquisition Schedule (included in the Applicant's Deadline 1 submission).
		Special category land	
8.22	Applicant	The SoR [AS-143] and BoR [AS-145] state that there is no land categorised as 'special category land' (i.e. common, open space or fuel or field garden allotment land). However, ES Chapter 11 [AS-028] makes numerous references to 'open space', including in respect of the River Cam and public rights of way. Please provide clarification on whether any of the Order land includes open space for the purposes of s131 and s132 of PA2008.	The Applicant confirms that there is no Special Category Land because there is no 'Open Space', (i.e. common, open space or fuel or field garden allotment land, as defined in s131 and 132 of PA2008), within the Order Limits. There are no designated areas of Open Space within the Order Limits. With regards to informal recreational use, as noted in response to ExQ1.7.12 paragraphs 3.1.30 to 3.1.58 of ES Chapter 11 (App Doc Ref 5.2.11) [**AS-028**] identify recreational facilities within the study area. The facilities listed

ExQ1.	Question to	Question	Response
			do not identify any land which comprises “open space” special category land for the purposes of s131 and s132 of PA 2008. It can be seen from Figure 11.10: Open Space and recreational areas (Book of Figures – Community (App Doc Ref 5.3.11)) [**AS-046**] that the green space, open space and recreational areas referred to in ES Chapter 11 are outside of the Order Land. There are public rights of way within the Order Land but a right of way is a right to pass and re-pass over land, whether on foot, with vehicles, by bicycle or on horseback. This is not a public right to use land for recreational purposes and land which is subject to a public right of way is not Open Space Special Category Land. Public rights of way and public rights to use land for recreation are different legal constructs, subject to different common law regimes and statutory frameworks. Nor do rights of navigation on the river Cam (whether private, statutory or public) give rise to rights of the public to use the river for recreational purposes. Navigation rights are similarly distinct from public rights of recreational use and are more akin to public rights of way. The river Cam is not Open Space Special Category Land. Rather, it is subject to navigation rights, the exercise of which is strictly controlled by the Cam Conservators pursuant to their statutory powers. For the avoidance of doubt, therefore, the Order Land does not include any open space for the purposes of s131 and s132 of PA2008.
8.23	Applicant	Plan [AS-152] is titled ‘Special Category and Crown Land Plan’. However, the BoR indicates there is no land classified as special category land. Please clarify and amend as necessary (noting also the above question on the matter).	As Special Category Land has not been identified within the Order Limits (see ExQ1.8.20), the Applicant has changed the title of these plans to “Crown Land Plans” and they are included in the Applicant’s submission at Deadline 1.
8.24	Applicant	Consent is required for any provision in the DCO which would relate to Crown land or rights benefiting the Crown in accordance with s135(1) and s135(2) of PA2008. Among other things this includes consent for any TP sought over Crown land. Part 4 of the BoR [AS-145] identifies no Order land under Crown ownership (which is confirmed in the SoR) but lists numerous plots in which the Crown holds an interest in the land. Elsewhere, the description of these plots includes the tailpiece ‘except those interests belonging to the Crown’. a. Please provide a further explanation for the inclusion of this wording and what it implies for the purposes of s135 of PA2008; b. The SoR [AS-143] advises that you are in discussions with the appropriate Crown authorities (SoS for Transport and SoS for Defence) in order to obtain their consent to the inclusion of these provisions as required under s135 of PA2008. Please provide an update on where these discussions are and confirm whether agreement will be reached before the close of the Examination; and c. Please confirm whether any land subject to escheat is included within the Order limits?	(a) The tailpieces reflect the provisions of section 135 PA2008 which exclude Crown interests from compulsory acquisition. They expressly confirm that compulsory acquisition is not sought nor permitted in relation any interest in the land belonging to the Crown. The tailpieces do not affect the operation of section 135 in any way. (b) The SoS for Transport has recently instructed solicitors to consider the s135 application and the Applicant will now progress discussions with those advisors. The SoS of Defence is actively engaging on the s135 application and is seeking to ascertain whether it is still the beneficiary of the relevant Crown interests. The Applicant expects to reach agreement with both parties (if required) by the close of the Examination. (c) The Order Limits do not contain any land subject to escheat.
		Compensation provisions and adequacy of funds	
8.25	Applicant	Since the production of the Funding Statement [APP-013], have there been any changes / cost implications which necessitate for it to be updated as a result (i.e. para 3.1.9 relates to inflation and market condition tracking and para 3.1.10 relates to a commitment to work together to secure additional funding)?	As stated in paragraph 3.1.9 of the Funding Statement (App Doc Ref 3.2) [**AS-013**], the Applicant has kept the estimated cost of the Proposed Development under review for changes in market conditions and contingency. The result of the review has shown an increase in costs to deliver the Proposed Development, mainly relating to building cost inflation. As stated in paragraph 3.1.10 of the Funding Statement (App Doc Ref 3.2) [**AS-013**], the parties to the HIF Agreement are committed to working together to secure any additional funding required for the Proposed Development. The Applicant is confident that the continuation of this collaborative working will lead to a mechanism becoming available during the Examination to secure the additional funding required.

ExQ1.	Question to	Question	Response
			Preparations to award the construction contract are progressing, and so, in order to maintain competitive tension in the procurement process and so obtain best value, the revised estimate of costs must remain confidential.
8.26	Applicant	If the project costs increase, how would the additional funding be secured?	As stated in its response to ExQ1.8.25, the parties to the HIF Grant Funding Determination Agreement ("GDA") (included in the Applicant's Deadline 1 submission) are committed to jointly working to secure additional funding. This was envisaged as being potentially needed in the GDA which, therefore, includes a mechanism for additional engagement by the parties to allow for additional funding to be secured. The parties to the GDA are committed to meeting all Cost Overruns up to 5% of the Maximum Sum (clause 6.6.4 of the GDA). For greater cost increases, there is a mechanism for the parties to meet and, in good faith, agree a strategy for securing the additional funding. Confidential commercial discussions on this, and a range of options (including accelerating delivery) are ongoing, and are expected to conclude during the Examination. In addition, the parties to the GDA have the option, if required, to utilise, as the development comes forward, any uplift in value due to them (after costs have been deducted) achieved from the change of use of the North East Cambridge/Hartree to a residential led development. This is set out in the Recycling Strategy included at Part 2 of Schedule 6 of the GDA.
8.27	Applicant	Funding Statement para 3.1.3 [APP-013] indicates that funding for elements of the Proposed Development would be through the 'Final Determination' of an 'Asset Management Period'. a. Is the relevant funding secured through the 2020-2025 period or a future period; b. If a future period, how certain can the Applicant (and the ExA) be that such funding would be approved / secured; and c. If a future period, what implications would this have for the delivery of the Proposed Development and timescales for the ability to pay compensation?	The Applicant has the following answers for each part of the question. a. The £22.5m funding described in paragraph 3.1.7 of the Funding Statement (App Doc Ref 3.2) [**AS-013**] will be used to fund the cost of part of the treatment capacity at the new WWTP. It will be forthcoming from the Final Determination of the Price Review 24, which is for Asset Management Period 8, which covers 2025 to 2030. The Waterbeach Pipeline (North and South) elements of the Proposed Development (Works Nos 33 to 37 (see Works Plans (App Doc Ref 4.3) [**AS-150**]) is a committed *Growth Scheme within the Applicant's draft business plan. This has been submitted to Ofwat as part of its submission to the Price Review 24*. b. In relation to the funding for the treatment capacity at the proposed WWTP relating to Waterbeach (see a. above), the Applicant's board has approved the ringfencing of £22.5m to this project (see paragraph 3.1.7 of the Funding Statement (App Doc Ref 3.2) [**AS-013**] for the context to this point). In relation to the cost of the Waterbeach Pipeline (North and South) elements of the Proposed Development (Works Nos 33 to 37 (see Works Plans (App Doc Ref 4.3 [**AS-150**]), the Applicant is confident about securing the necessary funds through the Price Review 24 process. c. The Final Determination will not affect the funding for the land compensation, which has already been secured.
8.28	Applicant	Has the Funding Statement [APP-013] taken into account all potential project costs, including biodiversity offsetting (notably river units) and potential carbon offsetting costs (as mentioned in para 6.1.19 of ES Chapter 8 [AS-026] and para 5.1.4 of ES Chapter 10 [APP-042] respectively)?	The Applicant can confirm the Funding Statement (App Doc Ref 3.2) [AS-013] has taken into account all project costs, including those relating to Biodiversity Net Gain and carbon offsetting. These costs will be met by the HIF funding agreement (see the Funding Statement (App Doc Ref 3.2) [**AS-013**]).
8.29	Applicant	Funding Statement para 4.1.5 [APP-013] identifies total costs for compensation / CA / TP to be in the region of £5 million. a. Please provide a breakdown of this figure, noting that it has been arrived at through professional advice from a chartered surveyor (para 4.1.4). b. Please clarify if this figure includes the £1.2 million for potential blight claims; and c. Please confirm whether any blight notices have been received?	The Applicant has appointed the specialist compulsory acquisition services of Savills to undertake a property cost estimate. The property cost estimate includes the cost of compensating affected parties for the compulsory acquisition of land and new rights, including compensation arising from severance, disturbance costs and contingency. The compensation sums are broken down as follows. Market Value of land: £3.5m

ExQ1.	Question to	Question	Response
			Acquisition of rights: £0.3m Disturbance costs, temporary possession compensation, severance and injurious affections compensation, s10 claims, Part 1 claims and contingency: £1.2m Total: £5m (see paragraph 4.1.6 of the Funding Statement (App Doc Ref 3.2) [**AS-013**]) The property cost estimate excludes the £1.2m estimated to cover any blight notices (see paragraph 4.1.8 of the Funding Statement (App Doc Ref 3.2) [**AS-013**]). The Applicant confirms no blight notices have been received.
8.30	Applicant	Is the construction of the proposed Waterbeach pipeline element included within the £22.5 million referred to in Funding Statement para 3.1.7 [APP-013]? If not, what would be the cost of this element and how would it be funded?	As noted in paragraph 3.1.3 of the Funding Statement (App Doc Ref 3.2) [**AS-013**]), the costs of delivering the Waterbeach Pipeline elements of the Proposed Development (Works Nos 33 to 37 (see Works Plans (App Doc Ref 4.3 [**AS-150**]) will be funded by the Applicant's 'business as usual' regulatory funding cycle. As a result, the Waterbeach Pipeline elements of the Proposed Development (Works Nos 33 to 37 (see Works Plans (App Doc Ref 4.3 [**AS-150**])) together are a committed Growth Scheme within the Applicant's draft business plan which has been submitted to Ofwat as part of its submission to the Price Review 24 (AMP 8) See ExQ1.8.27 above. This funding was originally allocated in AMP 7 (2020 to 2025) but the delivery date is now within AMP 8. Given this, and as a committed Growth Scheme, the Applicant is confident that this funding will be available.
8.31	Applicant, Homes England	Planning Statement para 1.7.6 [AS-166] states that the HIF places obligations on the Applicant to relocate and commission the proposed WWTP and decommission the existing WWTP by March 2028, with works (as shown on Figure 1.1) set to commence in the second quarter of 2024 (albeit the application for the s35 Direction suggested commencement in early 2024 to meet the March deadline (page 137 of the Planning Statement)). a. How can the ExA be certain that this timescale is achievable (including having regard to SoS decision dates, approval of permits, discharging of pre-commencement requirements etc.); b. Are there any potential unforeseen issues which might arise which may have implications for this timescale; and c. Should the timescales not be met, what implications would this have for the HIF?	The Applicant has the following answers for each part of the question. a. The timescales included in the question remain the Applicant's target timeframe, but the Delivery Stage Milestones are indicative and will as necessary be adjusted before the Delivery Stage commences. The extensive preparatory work carried out as part of the preparation of the Application, and the ongoing work during the Examination, have maximised the Applicant's ability to achieve the timescales set out in the Planning Statement (App Doc Ref 7.5) [**AS-166**]. Once the Milestones have been finalised, there is a further ability to adjust these, if there is a defined "Milestone Extension Event", or otherwise with the agreement of Homes England (acting reasonably) pursuant to the provisions under clause 8.2 and 8.3 of the GDA. b. The preparatory work mentioned above has minimised the potential for unforeseen issues that might arise, but as we have noted, there is flexibility in the GDA to enable these to be addressed, with extensions to the Milestones where "Milestone Extension Events" occur, and the ability to agree other extensions where reasonable. c. As we note above, the GDA includes flexibility to ensure the Milestones remain appropriate and reflect the realistic expectations of the parties- the Delivery Stage Milestones were expressed to be indicative only as it was recognised that further investigations would be required, including the progression of the DCO, – before these could be fixed.
8.32	Applicant	Other made DCOs have included a requirement to ensure that funding for CA / TP and other compensation would be in place prior to the exercise of the relevant powers (see, for example, Article 45 of the Hornsea Four Offshore Wind Farm Order 2023 and Article 31 of the Awel y Môr Offshore Wind Farm Order 2023). Given the complexities of funding in the case of this project and the different funding sources for various elements of it, would the Applicant be willing to include a similar requirement in the dDCO for this project?	The Applicant does not consider that the funding by the Applicant of compulsory acquisition/temporary possession compensation is complex. Paragraphs 4.1.5 and 4.1.6 of the Funding Statement (App Doc Ref 3.2 [**AS-013**] confirm that the estimated £5 million liability will be met from the Applicant's own funds that it receives as part of its regulatory funding cycle. The Applicant does not consider that security for compensation should be required before it exercises the powers of compulsory acquisition/temporary possession in the DCO. The practice of including a security article has developed for promoters of projects such as the Hornsea Four and Awel y Môr projects referred to in the ExQ. Such promoters are often corporate joint venture entities without substantial assets, and for whom the Planning Act 2008 is the only means by which compulsory acquisition powers may be available.

ExQ1.	Question to	Question	Response
			In contrast, the Applicant is a regulated entity and a statutory undertaker with separate powers to make compulsory purchase orders, such as those under the Water Industry Act 1991. There is no equivalent requirement for financial security for compulsory purchase compensation were the Applicant to pursue a CPO rather than a DCO. Furthermore, other statutory undertakers or bodies with their own compulsory purchase powers have not been required to provide security for compensation, eg: a. National Grid Electricity Transmission Plc (The National Grid (Hinkley Point C Connection Project) Order 2016 and The National Grid (Richborough Connection Project Development Consent Order 2017); b. Highways England (The A303 (Amesbury to Berwick Down) Development Consent Order 2023); c. Network Rail (The Network Rail (Ipswich Chord) Order 2012); d. Transport for London (The Silvertown Tunnel Order 2018); e. Thames Water (The Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014) The Funding Statement explains that Anglian Water Services Financing Plc (AWSF) raises money on behalf of the Applicant in the UK bond market and these funds underpin the group's investment in water services and infrastructure. The Applicant and AWSF have substantial assets and resources as referenced in the Funding Statement – with consolidated net assets of £2,314 million for the year ending 31 March 2022. Accordingly, the Applicant does not consider that a security for funding article is necessary.
		Site specific issues	
8.33	Applicant	Having regard to RRs [RR-028, RR-109, RR-245 and RR-239], please clarify: a. the extent of the use of access through Poplar Hall Farm (including Plots 021a and 021i) during the construction and operational phases of the Proposed Development; b. to what extent access to neighbours and services would be affected; c. to what extent any farming / business operations would be affected; and d. the need for the permanent acquisition of Plots 021b, 021r and 021s. Following notification from PINS, the plot numbers cited in the question have been amended from 012_ to 021_.	The Applicant has reviewed the RRs listed in this question and can clarify accordingly. a. During the construction phase, the approximately 40% of the track to Poplar Hall/Poplar Hall Farm will be used for 3 to 6 months to gain access to the area within which Works No 29 (Temporary Access Works to Works 28, 34 & 36 (West of Horingsea Road) see Sheet 2 of the Works Plans (App Doc Ref 4.3) [**AS-150**])) will be constructed. This will allow the construction of the access from Horningsea Road onto the land to the south of the track leading to Poplar Hall/Poplar Hall Farm. During this time, construction traffic will not be using the remaining 60% of the track, at its western end. The location of the temporary junction onto Horningsea Road will be in Parcels 022e and 028e (see Sheet 2 of the Land Plans (App Doc Ref 4.4) [**AS-151**]). The track will also be used to gain access to remove Works No 29 (Temporary Access Works to Works 28, 34 & 36 (West of Horingsea Road) see Sheet 2 of the Works Plans (App Doc Ref 4.3) [**AS-150**]). This will require use of the track for a further 3 to 6 months after the Transfer Tunnel has been constructed (see Sheet 2 of the Works Plans (App Doc Ref 4.3) [**AS-150**]). The use of the access after the construction phase, and so during the operational phase, will be very limited. The access is likely to be used once a year, by means of a light van driving down the track to access the outfall (Work No. 32 on Sheet 2 of the Works Plans (App Doc Ref 4.3) [**AS-150**]). b. Although it is not clear what is meant by "access to neighbours and services", the Applicant can confirm that, during the construction phase, the Applicant will ensure access to neighbours and services are maintained. During the operational phase, there will not be any effect on access to neighbours or services. c. During the construction phase, the arable farming operations at Poplar Hall Farm will be affected, with some parts of the farm being out of operation for one or two growing seasons. The Applicant will work with the landowner and its tenant to minimise the impact during the construction phase, in line with the

<table>
<tr><th>ExQ1.</th><th>Question to</th><th>Question</th><th>Response</th></tr>
<tr><td></td><td></td><td></td><td>Code of Construction Practice Parts A or B (App Doc Refs 5.4.2.1 and 5.4.2.2) [AS-068 and AS-161]. As described in the Compulsory Acquisition Schedule (which is submitted as part of the Applicant's Deadline 1 submission), the Applicant is in discussion with the landowner regarding the best way to minimise the impact and agree the financial arrangements to compensate the parties.

d. Parcel 021b is needed for the following reasons.

• It will be the location of part of the outfall structure (Works No 32 (see Sheet 2 of the Works Plans (App Doc Ref 4.3) [AS-150]). The presence of the outfall structure will be incompatible with other uses of the land therefore the Applicant requires exclusive possession and control of the land in which it is situated.
• This parcel is also the proposed location for ecological mitigation and Biodiversity Net Gain (Works Nos 39 Ecological Mitigation Area (see Sheet 2 of the Works Plans (App Doc Ref 4.3) [AS-150]))
• Flexibility is needed for the final location and layout of the ecological mitigation and Biodiversity Net Gain because its location will need to take account of the location of a construction compound, the sequence of the construction work associated with the outfall and final effluent/storm pipelines, the siting of the footpath diversion and the location of the ecological mitigation activity. See Sheet 2 of the Works Plans (App Doc Ref 4.3) [AS-150] for the various proposed activities in the area.
• Freehold acquisition of the land comprising the ecological mitigation and BNG area is required in order to exclude other land uses and protect the newly established habitats
• The applicant intends to take temporary possession of the area during the construction period, and then only permanently acquire the freehold of the proposed outfall and ecological mitigation area, which will significantly minimise the extent of permanent acquisition required. The Applicant will also acquire permanent rights and a restrictive covenant for the final effluent pipeline when its final layout is known.

Parcel 021s is the location of Shaft 4 of the Transfer Tunnel (Work Nos 27 Transfer Tunnel (see Sheet 2 of the Works Plans (App Doc Ref 4.3) [AS-150]). Parcel 021s is the location of Shaft 5 (see Sheet 2 of the Works Plans (App Doc Ref 4.3) [AS-150]). As described in paragraph 5.4.19 of the SoR (App Doc Ref 3.1) [AS-143], the Applicant requires the freehold ownership and control of the land in which the two shafts are constructed to protect the structural integrity of the Shafts and the Transfer Tunnel around them.</td></tr>
<tr><td>8.34</td><td>Applicant</td><td>The Parochial Church Council of the Ecclesiastical Parish of Horningsea [RR-038] raises concerns around Chancel Repair Liability and funding effects as a result of CA. Please clarify to what extent its Chancel Repair Liability interests in respect of the relevant plots would be affected?</td><td>The Applicant has noted in Part 1 of the BoR (App Doc Ref 3.3) [AS-146] that the land within the following Plots is subject to a Chancel Repair Liability ("CRL") which may be called upon by the Parochial Church Council of the Ecclesiastical Parish of Horningsea ("the PCC"). Each of these plots is identified on the Land Plans (App Doc Ref 4.4) [APP-018] and the table below identifies the proposed type of compulsory acquisition and the works sought in relation to each parcel. The registered title number of the land the subject of the CRL has also been added where applicable.

<table>
<tr><th>Plot number</th><th>Land Registry Title Number</th><th>Nature of Acquisition</th><th>Works</th></tr>
<tr><td>001a</td><td>Unregistered</td><td>Permanent new rights and/or restrictive covenants</td><td>Work No.17 - Existing rising and gravity main diversions</td></tr>
<tr><td>001b</td><td>Unregistered</td><td>Interference with private rights only</td><td>Schedule 1 Further Works</td></tr>
<tr><td>001c</td><td>CB111745</td><td>Interference with private rights only</td><td>Schedule 1 Further Works</td></tr>
</table></td></tr>
</table>

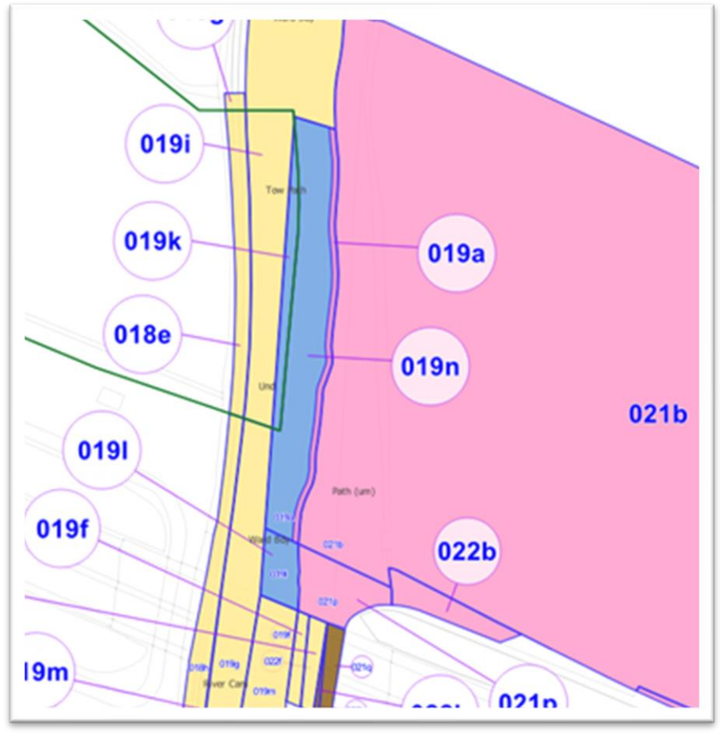
ExQ1.	Question to	Question	Response

036a	CB362708	Freehold Acquisition	Works Nos.: 08 – Sludge treatment centre 10 – Secondary treatment membrane aerated biofilm reactor (MABR) 14 – Stormwater Management 15 – Proposed Waste Water Treatment Plant landscape bund and photovoltaic (PV) 22 – Proposed Waste Water Treatment Plant construction works 23 – Landscaping and ecological works
036b	CB362708	Freehold Acquisition	Work No.23 – Landscaping and ecological works
036c	CB362708	Permanent new rights and/or restrictive covenants	Works No.33 - Waterbeach pipeline north
036d	CB362708	Temporary Possession	Works No.34 - Waterbeach pipeline construction area and compounds
036e	CB362708	Permanent new rights and/or restrictive covenants	Works No.24 – Landscaping and ecological temporary work area Works No.33 - Waterbeach pipeline north Waste Water Treatment Plant
036f	CB362708	Permanent Access Rights	Works No.24 – Landscaping and ecological temporary work area Waste Water Treatment Plant
041a	CB438367	Interference with private rights only	Works No. 37 – Access works for works nos. 33 & 34
050a	CB95913	Permanent Access Rights	Works No.33 - Waterbeach pipeline north

The Applicant does not consider that a CRL is capable of being acquired or extinguished by any of the compulsory acquisition powers in part 5 of the dDCO. A CRL is an incorporeal hereditament which does not benefit and is not annexed to any land, neither land in the ownership of the PCC or otherwise. It is not a property interest which is

ExQ1.	Question to	Question	Response
			therefore capable of being compulsorily acquired by the exercise of compulsory acquisition powers. Rather, when the freehold ownership of land that is subject to a CRL is transferred, it will be transferred subject to the CRL to the extent that the CRL still subsists and is capable of enforcement. The right belongs to PCC as an entity, as to opposed to any land or church owned by the PCC, and it has the right to call for the repair liability from the owner of the affected land at the relevant time, assuming the liability has been properly protected (e.g. by the lodging of a caution against first registration of unregistered land, or by entering a notice on the title to registered land). Nor does the Applicant consider that a CRL is capable of being interfered with pursuant to Articles 31 or 32 of the dDCO. Article 31 (Private Rights) and Article 32 (Power to override easements and other rights) contains powers which enable the extinguishment, suspension, overriding or interference with private rights and interests in certain circumstances. For example, where freehold land is acquired compulsorily, all private rights over that land are extinguished automatically pursuant to Article 31 on the date of acquisition or entry as the case may be. Where new rights are acquired, private rights are extinguished under Article 31 only insofar as their continuance is inconsistent with the exercise of the Applicant's rights. Article 32 does not permit the extinguishment of private rights but permits rights to be overridden where the Applicant's use of the land or works (or persons deriving title from the Applicant) interferes with or breaches a private right. Those provisions only apply to the following rights: Article 31(Private Rights): Article 31(9) – Reference in this article to private rights over land includes reference to any right of way, right of navigation, trust, incident, easement, liberty, privilege, right or advantage annexed to land and adversely affecting other land, including any natural right to support and include restrictions as to the user of land arising by virtue of a contract, agreement or undertaking having that effect Article 32 (Power to override easements and other rights): Article 32(3) – The interests and rights to which this article applies include any easement, liberty, privilege, right, including any right of navigation, or advantage annexed to land and adversely affecting other land, including any natural right to support and any restrictions as to the use of land arising by virtue of a contract In each case, these articles apply only to such private rights and interests that are annexed to land and which adversely affect other land. The Applicant does not have sufficient information about the CRL affecting the land in the dDCO to ascertain whether the benefit of the CRL is protected and whether the liability and benefit continue to date. However, it is unlikely that the CRL will constitute a '*liberty, privilege, right or advantage annexed to land*' for the purposes of Articles 31(9) and 32(3) that would be automatically extinguished upon the Applicant exercising its compulsory acquisition powers: as explained above, the right belongs to the PCC as an entity, not to any particular land. Were the Applicant to be wrong, and were the CRL to fall within the relevant definitions, the CRL could only in principle be extinguished in relation to those plots subject to full freehold permanent powers of compulsory acquisition – namely plots 036a and 036b – because for all other land parcels the ownership of the land will rest with the relevant landowner at the time, and that party will remain liable to the CRL.

ExQ1.	Question to	Question	Response
			In relation to plots 036a and 036b, to the extent that the liability exists and is enforceable, the Applicant will acquire the land subject to the CRL, and the Applicant does not consider that Article 31 would operate to extinguish that liability. In the event that Article 31 does extinguish the CRL over plots 036a and 036b, the PCC would have a right to claim compensation pursuant to Article 31(5).
8.35	Applicant	There are some substantial areas subject to proposed CA freehold acquisition (shown pink on the Land Plans) in addition to the main proposed WWTP site, including strips along the proposed transfer tunnel route and rising main, the proposed bridleway and an area around the proposed new outfall location. Please provide further justification for the proportionality of such CA.	The freehold acquisition along the route of the proposed Transfer Tunnel (Works Nos 27 (see Sheet 2 of the Works Plans (App Doc Ref 4.3) [**AS-150**]) principally relates to the acquisition of the freehold of the subsoil (at a depth greater than 7 metres) within which the tunnel structure will be located. Freehold acquisition is required because the Transfer Tunnel will be a significant fixed structure through land which cannot be used for any other purpose. The two locations of the shafts, for which full freehold acquisition powers are sought rather than subsoil only) are explained further in the Applicant's response to ExQ1.8.33 above. As explained in paragraph 5.4.5 of the SoR (App Doc Ref 3.1) [**AS-143**], the final extent of the subterranean freehold interest to be acquired within the corridor shown pink on the Land Plans (App Doc Ref 4.4) [**AS-151**] will be determined by the size and location of the proposed Transfer Tunnel, having regard to the tunnel structure and the protective area around it. An indicative diagram of the likely diameter of the underground freehold area of acquisition can be found in Appendix 6 of the SoR (App Doc Ref 3.1) [**AS-143**]. In addition, restrictions (the Transfer Tunnel Restrictive Covenant) need to be imposed on the surface above the route of the proposed Transfer Tunnel, and in a protective zone around the tube of freehold acquisition), to protect the integrity of the structure. The strategic importance and longevity of the proposed Transfer Tunnel (see paragraph 5.4.8 of the (App Doc Ref 3.1) [**AS-143**] means it is proportionate to acquire this type, and extent, of interest. The Land Plans (App Doc Ref 4.4) [**AS-151**] do not show the acquisition of freehold interests in relation to the Waterbeach rising mains (Works Nos. 33 and 36) (see Works Plans (App Doc Ref 4.3) [**AS-150**] and the Applicant does not seek such permanent acquisition powers for that infrastructure. There are locations where the Waterbeach Rising Main South (Works No. 36) and the Waste Water Transfer Tunnel (Works No. 27) (App Doc Ref 3.3) [**AS-150**] cross over (to the south east of Junction 34 of the A14 (see Sheet 3 of the Land Plans (App Doc Ref 4.4) [**AS-151**])) or are in close proximity to each other (in the area to the west of Fen Road (see Sheet 2 of the Land Plans (App Doc Ref 4.4) [**AS-151**])), but any such pink land and freehold acquisition relates to the Transfer Tunnel and not the rising mains. Parcels 035a,037c, 037d (see Sheet 6 of the Land Plans (App Doc Ref 4.4) [**AS-151**]) are shown for freehold acquisition because the Applicant needs to own the freehold of those parcels so it can dedicate the route of the proposed bridleway (see section 3.5 of the Environmental Statement - Volume 4 - Chapter 8 - Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [**AS-066**]). As described in the Compulsory Acquisition Schedule (submitted as part of the Applicant's Deadline 1 submission) the Applicant has reached agreement with the existing landowner for the principle of a permissive bridleway to be put in place. This will mean the Applicant should not need to exercise any compulsory acquisition powers over that land. In relation to parcel 019a (see Sheet 2 of the Land Plans (App Doc Ref 4.4.2) [**AS-151**]), the Applicant has reduced the extent of this parcel, and changed the balance of the parcel to the acquisition of Permanent New Rights and/or Restrictive Covenants. This is described in the Applicant's response to ExQ1.8.36 below.

ExQ1.	Question to	Question	Response
			The acquisition of the freehold of parcel 021b is required to enable ecological mitigation and the provision of Biodiversity Net Gain, as described in ES Chapter 8 Appendix 8.13 Biodiversity Net Gain (BNG) Report (5.4.8.13) [**AS-163**]. Please see ExQ1.8.36 in relation to the area around the proposed outfall location and ExQ1.8.9.
8.36	Applicant	Plot 019a (freehold acquisition) extends some distance over the River Cam. Please justify the extent and indicate how freehold acquisition may affect any users of the River Cam and access to this part of the river.	Following the ExA raising this question during the ISH1, the Applicant has reviewed the extent of freehold acquisition necessary in parcel 019a and the use of the river Cam in that area. This has resulted in the reduction of parcel 019a as shown on the image below.  The balance of parcel 019a as shown on Sheet 2 of the Land Plans (App Doc Ref 4.4) [**AS-151**] has been redrawn as a new parcel, numbered 019n and its acquisition classification has been changed to Permanent New Rights and/or Restrictive Covenant - referred to in Schedule 10 to the Draft Development Consent Order (App Doc Ref 2.1) [**AS-010**] as the 'River cam Rights'. In addition, the acquisition classification of parcel 019k has also been changed to Permanent New Rights. All these changes are shown on Sheet 2 of the Land Plans (App Doc Ref 4.4 [**AS-151**]. These changes will allow for the acquisition of the land necessary for the outfall structure (Work No. 32 (see Sheet 2 of the Works Plans (App Doc Ref 4.3) [**AS-150**])) but minimising the area covered by powers to compulsorily acquire the necessary freehold interest.

ExQ1.	Question to	Question	Response
			The change of land acquisition category for parcels 019n and 019k to Permanent New Rights and/or Restrictive Covenant a reflects the Applicant's need to acquire new rights for construction, operation, maintenance and protection purposes of these two parcels whilst minimising interference with navigation rights. These changes do not affect the works within Work No 32 (see Sheet 2 of the Works Plans (App Doc Ref 4.3)) [**AS-150**]. Nor is any 'additional land' sought as part of the revised land rights package therefore the Infrastructure Planning (Compulsory Acquisition) Regulations are not engaged. These changes will be communicated to the relevant parties, including the Cam Conservators and Gonville & Caius College which owns parcel 021b (and others). Please also see ExQ1.8.9 and ExQ1.8.35.
		Other	
8.37	Applicant	Are any land or rights acquisitions required in addition to those sought through the dDCO before the Proposed Development could become operational?	No additional land or land rights are required before the Proposed Development can become operational.
8.38	Applicant	Please clarify: a) how you have had regard to the Equality Act 2010 in relation to the powers sought; b) whether any Affected Persons have been identified as having protected characteristics; and c) if so, what regard has been given to them.	A) The EqIA (App Doc Ref 7.11) [**AS-210**] has been undertaken in support of the Applicant's obligation under UK equality legislation, and in particular the Equality Act and the Public Sector Equality Duty, which encourages organisations delivering public functions, such as the Applicant, to understand how different people will be affected by their activities. It also meets the requirements of the NPS for Waste Water which sets out the requirement to undertake an EqIA for the construction, operation and decommissioning phases of a development. The assessment of effects was undertaken in light of the sensitivity of affected parties (such as local residents, business owners, employees and users of community facilities) to the Proposed Development, referring to people with characteristics protected under the Equality Act. Both adverse and beneficial impacts have been assessed taking into account proposed mitigation measures which will be implemented as part of the Project. Based on the assessment undertaken, no adverse equality effects are expected as a result of the construction, operation or decommissioning phases of the Proposed Development. During operation there will be beneficial equality effects on PRoW as a result of improvements to the network. This will result in a differential impact on children, older people and disabled people. There will also be a beneficial effect on personal safety and security due to increased CCTV and lighting provision, differentially benefitting older people, disabled people, ethnic minority groups, men, women and LGBT+ groups. Finally, the inclusion of a discovery centre as part of the operational design will differentially benefit children and young people who will have access to a new educational resource. The assessment and methodology undertaken as part of the EqIA includes the construction, operation and decommissioning of the Proposed Development, and so necessarily includes the compulsory acquisition powers sought, without which the Proposed Development could not proceed. B)The EqIA's study area includes Affected Persons who own/occupy properties located within or in close proximity to the Proposed Development site, including those on Red House Close, Poplar Hall, Poplar Hall Farm, Northern Bridge Farm (see Table 4.1 of the EqIA for example). Therefore the assessment of the Proposed Development's effects on protected groups which has been undertaken includes Affected Persons. However, as explained in the EqIA, the demographic of those that own/occupy these residential receptors is unknown and it is not possible to

ExQ1.	Question to	Question	Response
			specify whether a particular person falls within a protected characteristic group. Nor has the Applicant been notified by any Affected Persons within Categories 1 and 2 that they have a protected characteristic. In any event, as set out above, no phase of the Proposed Development is anticipated to adversely affect any group protected under the Equality Act 2010.
8.39	Applicant	Please clarify why Waterbeach Parish Council are listed in the BoR Part 2 (Category 3) multiple times	Waterbeach Parish Council are the registered owner of three land titles. Across these titles there are several variations of name and address given for the Parish Council, all of which are very minor but, nonetheless, are differences in the data held by the Land Registry. This data, and the three variations of the Parish Council's details, was recorded in Part 2 of the BoR (App Doc Ref 3.3) [**AS-146**]. Upon further review, the Applicant considers that the Parish Council should only appear once in Part 2 of the BoR, and so duplicate entries have been removed from the version of the BoR (App Doc Ref 3.3) which is submitted as part of the Applicant's Deadline 1 submission.
8.40	Applicant	Please clarify, having regard to [RR-033, RR-042, RR-057, RR-128 and RR-213], whether any changes to the BoR [AS-145] are required.	The Applicant has considered the Relevant Representations listed in the question and can confirms that no changes are required to the BoR (App Doc Ref 3.3) [**AS-146**] as a result.

9. Design

ExQ1	Question to	Question	Response
9.1	Applicant	**Design principles and objectives** The DAS [AS-168] includes a set of Design Objectives and a set of Design Principles. a) Explain the reasons for only referring to the Design Objectives in R7 of the dDCO [AS-139]; b) Clarify whether, by not referring to the Design Principles in R7 of the dDCO (which make reference to a design panel and design review process), the Applicant does not intend to use a design review panel to assist with determining the final design of the Proposed Development; c) Confirm whether the Applicant would be willing to include reference to the Design Principles in R7 of the dDCO and further to specify that the final design would be subject to review by a Design Review Panel, noting that this is encouraged in NPSWW para 3.5.2; and d) If so, please specify which bodies would be represented on the Design Review Panel and their specialisms (e.g. design, landscape architecture, ecology etc..).	a. The reason that only the Design Objectives are referred to in requirement 7 of the dDCO (Doc 2.1)[AS-139] is that the Design Objectives secure the Design Principa~~l~~les therefore by achieving the Design Objectives you also achieve and secure the Design Principa~~l~~les. The Applicant wishes to draw the ExA's attention to the table format within Section 11 of the DAS (Doc 7.6)[AS-168] and that the Design Objectives are set out against the theme of the relevant Design Principa~~l~~le they secure. b. The Applicant has engaged with the Design Council throughout the development of the design and is now left with the final detailed design of the development. Further design developments will be developed with the input from local combined planning authorities. The Applicant will again engage with the Design Council when developing its final detailed design. c. The Applicant would be willing to explore the inclusion of the design principles within the dDCO as they have been the driving force behind the design the Applicant has submitted for examination. d. The Design Council, who formed a panel of Built Environment Experts, comprised Planning specialists, Architects and Landscape Architects. The design was also presented to the Cambridge Quality Panel for review where local Architects, Landscape Architects, Planners, Engineers and Master Planners gave feedback on both the design development and the latest design as submitted. The Applicant has also worked closely with the CCC and SCDC combined planning authority Landscape team when developing its Landscape Masterplan and LERMP.
9.2	CCC, SCDC, IPs	**Design review** Please comment on the desirability of implementing a Design Review Panel to provide an informed 'critical friend' on the developing proposals, to ensure that good quality sustainable design and integration of the Proposed Development into the landscape is achieved in the detailed design, construction and operation of the project.	
9.3	Applicant	**Design characteristics** Noting for example SCDC's RR [RR-004], how would the proposed rotunda / hill fort inspired design reflect the landscape and historic character of the area and where are the nearest historic features of this type (or remnants of such) (i.e the local hillforts of the fens and Belsar's Hill as mentioned in the DAS [AS-168])?	Earthworks have long been part of the historic fabric of the Cambridgeshire landscape, present as impressive and often very large human-made landforms within our present-day landscape. These include both Iron Age circular hillforts, remnants of ring-like hill forts and ditches, and Anglo-Saxon Dykes. They are generally protective structures, for defence, for controlling water or movement of people across the fens, or as boundary markers. These sit alongside the agricultural fields, transport networks and rural settlements around Cambridge,

ExQ1	Question to	Question	Response
			sometimes influencing the patterns around them and sometimes having been long 'overrun' by vegetation, roads, or land uses that cut right through them or over them. As a result they are sometimes barely discernible in the landscape from afar or when travelling; indeed the forms from the ground may read as long and linear woodlands or grasslands, slightly elevated in the often low lying topography. However a visitor can more intimately experience and enjoy the earthworks' impressive forms, their mystery and original intent, their scale and the landscape around them. The proposed earthwork bank reflects the character of these existing local structures, inspired by the hillforts and long linear earthworks; by their presence in the landscape (those both obvious and barely discernible), their protective functions, and the wonder and enjoyment of those that visit and explore them. Similar to those existing earthworks that are 'overrun' by vegetation, our extensive planting on and around the earthwork serves both to settle the earthwork into its surroundings and, from sensitive locations, mitigate views so it becomes less discernible. The scale of our earthwork means that it will read in the landscape as a linear feature reminiscent of a dyke; and, in its circular form, it will appear linear from many viewpoints. It is a human made intervention in the landscape, to be appreciated and enjoyed by the visitors that walk around it, sometimes on it, and enjoy the woodland, grassland meadows and the enhanced habitats and ecology of the site. Circular examples in the Cambridge area include: • Wandlebury Hill fort, 6.9km to the south of the site; • Belsar's Hill, Willingham 10.9 km north of the site; • Cherry Hinton Hillfort, 4.77km south of the site – a remnant/buried 'ring ditch'; and • Buried remains of a ringwork at Fowlmere, 16.3km south of the site. Strong linear earthworks include: Fleam Dyke, Devil's Dyke, Brent Ditch and Bran ditch, all east of Cambridge, the nearest is 8.4km from site.
9.4	Applicant	**Design champion** Do you have a design champion within your organisation designated to the project? If so, what are their qualifications for such a role and what is their hierarchical position within the project?	The Applicant has had a Design Champion during the design phase of the project in Mr Jason Tucker. Mr Tucker is Anglian Water's Director of Strategic Delivery and Commercial Assurance and a member of the company's Management Board. He is also the Chairman of the Infrastructure Client Group. Mr Tucker has a technical background in civil engineering and considerable experience in delivering major capital investment projects and programmes, as well as being involved in industry-wide networks regarding large and nationally significant infrastructure projects. Therefore he brought both technical experience and senior management representation to act as the Design Champion.
9.5	CCC, SCDC	**Detailed design** Are you satisfied that you have sufficient design expertise to ensure good design of the Proposed Development (including the proposed WWTP, bunding and landscaping) in respect of discharging R7 of the dDCO [AS-139], were development consent to be granted?	
9.6	Applicant	**Requirements** R7(2) of the dDCO allows for an explanation as to why it may not be reasonably practicable to accord with the Design Objectives of the DAS. a) Under what circumstances might this occur; and, b) If it were to occur, could this have implications for the delivery of good design?	A. This may occur when the requirement for good design exceeds what is commercially or programmatically achievable within the project constraints. To date, the Applicant believes that none of these constraints would impact their ability to deliver a 'good design'. B. The level of pre-application design detail that informed the DCO application plans and Order Limits is sufficiently developed such that Applicant believes that the production of the detailed design, in consultation with the relevant authorities, will not impact 'good design' nor the ability of the development to be delivered within the parameters of the dDCO and in line with the Rochdale envelope described in the application document 5.2.2 ES Chapter 2 Project Description [APP-034]. This is due to the remaining design work comprising only design detailing rather than material differences that will impact the benefits of the project.
9.7	Applicant	**Policy** NPSWW para 3.5.1-2 sets out that good design is about ensuring attractive, usable, durable and adaptable places and contributing to sustainable development. Para 3.5.3 sets out that the development should, by the use of good architecture and appropriate landscaping, be as visually attractive as possible and that siting of the development and the sensitive use of materials are important aspects of design. Para 3.5.4 requires applicants to set out the main alternatives to the design they have considered and reasons why the favoured choice was selected.	Principles of Good Design have been used to inform the development of the project, which has been guided by the National Infrastructure Commission's Design Principles, advice from the Design Council and review by the Cambridgeshire Quality Panel, as described in the Design and Access Statement (DAS) (App Doc Ref 7.6 - **AS-168**). The DAS describes the design principles and objectives that have been applied to the development of the proposals, such as the design and external appearance of plant and buildings, materials and landscape planting. The design principles and objectives in the design and access statement will be secured by discharge of Part 2 of Requirement 7 Detailed Design of the dDCO [AS-139] which requires the submitted details must include an explanation of how they accord with the design objectives set out in section 11 of the design and access statement or an explanation of why this is not reasonably practicable.

ExQ1	Question to	Question	Response
		Please provide a detailed response as to how the Proposed Development would: a) Achieve good design having regard to NPSWW para 3.5.1 to 3.5.4; b) Accord with the National Infrastructure Commission's Design Principles for National Infrastructure (February 2020); and c) Accord with any adopted development plan policies relating to design.	The DAS and the Consultation Report (App Doc Ref 6.1 - **AS-115**) also describe the engagement process which has been undertaken and how the Proposed Development has responded to that feedback. a) This is addressed in Sections 1 and 11 of the DAS (App Doc Ref 7.6 - **AS-168**). The NPSWW Accordance Table (App Doc Ref 7.5.1) has been updated in respect of paragraphs 3.5.1 to 3.5.4 to reflect the above and is being provided at Deadline 1. b) This is addressed in Sections 1 and 11 of the DAS (App Doc Ref 7.6 - **AS-168**). c) This is addressed in the Local Policies Accordance Tables [App Doc Ref 7.5.5] which are provided at Deadline 1 and which list all the relevant adopted development plan policies and relevant emerging policies to the DCO.
9.8	Applicant	**Design constraints** Please clarify how the presence of a chalk aquifer has influenced the design of the proposed WWTP and what constraints this has posed for the potential to reduce the heights of structures / sink them deeper into the ground (noting, for example, that the terminal pumping station would be sunk relatively deep compared with, say, the digestors, as shown on [APP-023])?	The Chalk aquifer along with other considerations such as safety and operational maintenance has prevented the taller structures from being sunken into the ground. Other considerations that make the sinking of the digesters less plausible is the compliance with the Industrial Emissions Directive permit that requires easy identification of tank leakage and those areas to have secondary containment. Regarding the terminal pumping station, this will be constructed using a caisson method so will cut through the ground and seal itself once it reaches its formation level. This shaft will then operate as planned with any external water pressure being greater than that from the liquids inside, reducing any pollution pathways in the unlikely event the terminal pumping station cracks or leaks.
9.9	Applicant	**Design plans** For clarity, please annotate the boiler stack on the Design Plans - Site Plan [APP-023] (referred to as 'boiler stack' in dDCO and 'boiler chimney' in Design Plans cross sections [APP-023]).	Boiler stack and Boiler chimney are the same structure as shown in section c in 4.9.3 [APP-023]. The Applicant will make the relevant amendments by deadline 02 and adjust the plans to say 'Boiler Stack'
9.10	Applicant	**Design and Access Statement** The DAS para 2.2.2 [AS-168] sets out three bullet points for design improvements over the existing WWTP – how would these be secured?	The first bullet point of the DAS paragraph 2.2.2 [AS-168] will be secured by applying to the Environment Agency for an Industrial Emissions Directive permit. . Design and technology would be secured through the 'design statement' that forms part of the discharge of conditions The third bullet point will be secured by discharge of Requirement 20 of the dDCO [AS-139] which requires that no commissioning is to take place until a detailed odour management plan has been submitted to and approved in writing by the relevant planning authority. The detailed odour management plan must also be in accordance with the measures in application document 5.4.18.4 ES Chapter 18 Appendix 18.4 Preliminary Odour Management Plan [AS-106] and the principles and assessments set out in the relevant part of the environmental statement.
9.11	Applicant	**Parking** The DAS at para 2.11.2 [AS-168] states that photovoltaics may be installed over car parking within the earth bank. Where within the earth bank would car parking be located and where is this shown?	Page 100 of The DAS [AS-168] shows the parking area in a purple box.
9.12	Applicant	**Requirements** Does R7 of the dDCO relate to all aspects of the Proposed Development, including, for example, the Proposed Outfall to the River Cam, as well as the main proposed WWTP?	Yes. Requirement 7 of the dDCO does relate to all elements of the proposed Development including the proposed outfall to the River Cam. It relates to all phases of the "authorised development" as defined in the Order.

10. Draft Development Consent Order (dDCO)

ExQ1	Question to	Question	Response
Note: Questions / comments relate to dDCO [AS-139] (clean) and [AS-140] (tracked)			
General			
10.1	Applicant	Please amend the three relevant para on pages 4 and 5 to identify that the ExA is a panel / panel of three.	The Applicant has made this change and it is shown in Document 2.1 Draft Development Consent Order (Rev 5) (Clean) and 2.1 Draft Development Consent Order (Rev 5) (Tracked) submitted at Deadline 1.

ExQ1	Question to	Question	Response
			The change is also noted in Document 2.4 DCO Changes Tracker (Rev 3) (Clean) and 2.4 DCO Changes Tracker (Rev 3) (Tracked).
10.2	Applicant	The dDCO refers to some plans as being in outline (e.g. outline soil management plan), whilst others are not referred to in this way (e.g. construction traffic management plan (CTMP)), albeit detailed versions would be required to be submitted for approval. Please clarify the reason for this noting that this has the potential to cause some confusion.	The Applicant notes the Examining Authority's comments and confirms that of the plans named and certified pursuant to Schedule 19, the following are outline, albeit are not named as such: • The decommissioning plan • The commissioning plan • The construction works travel plan • Construction traffic management plan • Wildlife hazard management plan • Community liaison plan The Applicant does not propose to change the name of these plans to include the word 'outline' as it clear from reading these plans that they are outline. In addition, changing the dDCO drafting at this stage will also require the plans listed above themselves to be re-titled and several other documents in the application that refer to them (for example, certain parts of the ES, and the mitigation tracker) Further, it is noted that Requirement 9 requires a 'detailed' version of these plans to be submitted pursuant to that Requirement, thereby making it clear the named plans are the outline version. However, should updates to these plans be required during the examination the application will consider updating the titles at that stage to provide the clarity requested and would amend the dDCO to reflect any such changes.
10.3	Applicant, CCC, SCDC	The ExA understands that R17 relates to the decommissioning of the existing WWTP as per the definition in Sch 2, Part 1 of the dDCO [AS-139]. a) Should there be a requirement for, and which also details appropriate information for, the eventual decommissioning of the proposed WWTP; and b) If not, would this mean that it would remain on the site for an infinite period?	a) The Applicant notes that this was discussed at Issue Specific Hearing 1 and therefore refers the Examining Authority to paragraph 2B.19.1 of the Post-Hearing Submission (App Doc Ref 8.6). b) It is the intention that the proposed WWTW remain on site indefinitely and would note that the existing WWTP has been on its current site for approximately 100 years and could continue to remain there were it not for the current project. Should decommissioning be required at some future point, this would be regulated by the environmental permitting regime.
10.4	Applicant	Please explain how the dDCO would deliver closure, decommissioning, rescinding of operational consents, and transfer of the land to facilitate the development of the existing WWTP site.	The decommissioning of the existing WWTP forms part of Work No 40 – DECOMMISSIONING EXISTING CAMBRDIGE WASTE WATER TREATMENT WORKS Decommissioning is required by Requirement 17. Decommissioning must commence no later than three months following the completion of commissioning of the new WWTP site, and therefore this secures the operation of only one WWTP in the short term. The existing WWTP cannot be decommissioned until the new WWTP is commissioned as there is a need to continue to operate one WWTP at all times. Decommissioning for the purposes of Requirement 17 is defined in paragraph 1 of Part 1 of Schedule 2 by reference to the works described in the outline decommissioning plan (AS-051) and in summary covers (see paragraph 1.5.1 of that plan) decommissioning works to the existing Cambridge WWTP to cease its existing operational function and to facilitate the surrender of its operational permits including removal of pumps, isolation of plant, electrical connections and pipework, filling and capping of pipework, cleaning of tanks, pipes, screens and other structures, plant and machinery, works to decommission the potable water supply and works to restrict access to walkways, plant and machinery. The precise nature of the works required would be regulated by the Environmental Agency through the environmental permitting regime, and that process would be instigated through the decommissioning activities described in the plan. As for the rescinding of operational consents, this will be dealt with directly with the body which issued those consents/permits, namely the Environment Agency pursuant to the Environment Agency's RGN 9: Surrender Guidance.

ExQ1	Question to	Question	Response
			The draft DCO does not provide a mechanism for the transfer of the existing WWTP to a future developer, noting that the redevelopment of the existing WWTP does not form part of the DCO. However, as explained at Issue Specific Hearing 2 and noted in the Post-Hearing Submission Note at paragraph 2.27.3, the Applicant has entered into a Master Development Agreement with Land Securities. Land Securities is obliged to obtain planning consent and then put in the infrastructure on a phased basis and those plots will be sold to individual plot developers in accordance with the design guide. A graphical representation of the relationship between the dDCO, the environmental permitting regime and the contractual arrangements related to redevelopment is shown at Figure 1.1 of the outline decommissioning plan. The Examining Authority is further referred to the answer to question 2.31 which explains how the HIF Grant Funding Agreement and the Master Development Agreement then operate to deliver the housing.
Questions / comments relating to Articles (A)			
10.5	Applicant	A2 - The definition of 'commence' means to carry out a material operation – s155 of PA2008 defines this as any operation except one of a prescribed description. There are no prescribed descriptions in the term. However, R3 (phasing) and R15 (drainage) would seem to allow the enabling phase to commence prior to certain details being submitted and approved. a) How does this align with the definition of 'commence'; and b) Please clarify whether any works at all would occur prior to, for example, the discharge of R9 (CEMP) or R13 (AIMS), which are pre-commencement requirements?	The Applicant notes that this was discussed in general terms at Issue Specific Hearing 1 and refers the Examining Authority to paragraph 2B.1.2 of the Post-Hearing Submission (App Doc Ref 8.6). However, the Applicant notes the Examining Authority's specific references to Requirements 3 and 15 and has therefore responded below to address this in the context of the definition of 'commence'. Further, although not stated at hearing, the Applicant notes for completeness that as per Regulation 7 of the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015/462, there is one exclusion from the definition of 'material operation' in Section 155 of the Planning Act 2008: *Exclusion from definition of "material operation"* *The measuring or marking out of a proposed road shall not be included within the meaning of "material operation" for the purposes of section 155 (when development begins) of the Act* a) In respect of Requirement 3, paragraph 3(1) provides that, save for the enabling phase, the authorised development must not be commenced until a written scheme setting out the subsequent phase or phases of construction of the authorised development and the works to form part of each phase have been approved by the relevant planning authority. This is intended to operate so that the submission of the details of the enabling phase, including the works which form part of the enabling phase, do not need to be submitted pursuant to this Requirement. This is because the enabling phase is a pre-defined phase as defined in paragraph 1 of Part 1 of Schedule 2 of the dDCO by reference to Phase 1 Enabling Works, detailed in paragraph 3.1.6 of Chapter 2 (Project Description) of the Environmental Statement (Document 5.2.2). The effect of this is that the enabling phase may begin (subject to the discharge of other requirements relating to that phase), without details of the other, future phases having been approved. Turning to Requirement 15 (Drainage), this provides that save for the enabling phase, no phase is to be commenced until a detailed drainage strategy for that phase setting out the permanent drainage measures to be provided as part of that phase has been submitted to and approved in writing by the relevant planning authority. The effect of this is to allow the enabling phase to begin, without a detailed drainage strategy for the enabling phase having been approved. The enabling phase has been carved out from this requirement as no new drainage works are required for this phase. If, during the course of enabling phase, drainage works are identified, these will be removed if necessary in order to allow construction and then replaced, as they were. Given that there will not be any newly designed drainage and it will be a case of replacing what is already there only, it is not considered necessary to have a strategy.

ExQ1	Question to	Question	Response
			However, neither Requirement 3 nor Requirement 15 have the effect of altering when commencement begins for the purposes of the DCO. 'Commencement' is determined separately, and this is when a material operation is carried as defined in Section 155 of the Planning Act 2008. b) 'Phase' is defined in Schedule 2; Part 1 of the dDCO as follows: "phase" means the enabling phase and any subsequent phase of the authorised development as described in the latest phasing scheme approved by the relevant planning authority under requirement 3; This means that where there is reference to a phase, this includes the enabling phase, unless there is wording which has the effect of carving this out (as is the case with Requirements 3 and 15). Taking Requirement 9 as an example, no phase of the authorised development (which must include the enabling phase by virtue of the definition of 'phase'), can commence until the CEMP has been submitted to and approved by the relevant planning authority. Similar to the above, Requirement 13 provides that no phase of the authorised development, (again, this must include the enabling phase), can commence until the archaeological investigation mitigation strategy has been submitted to and approved by the relevant planning authority.
10.6	Applicant	A10, A11, A13, A14 and A15 - CCoC's RR [RR-001] requests some amendments to these articles – please address and update them accordingly.	The Applicant has responded by first setting out the relevant extract from Cambridge County Council's relevant representation in italics and then setting out its response: *Street Works (Article 10 and Schedule 3)* *13.9 The schedule should clearly state which streets are public highways and which are not.* The Applicant refers to its response to ExQ1.10.28 below which addresses the statutory definition of 'street' which includes adopted and unadopted highway. The Applicant is concerned that inserting reference to whether or not a street is currently adopted highway could create potential confusion in the future should the position of that change, but more importantly does not consider it to be necessary to the operation of the provision. *13.10 The undertaker should be required to agree the timing and nature of its works with the LHA prior to commencement and submit Permits via DfT Street Manager in advance of any works on the public highway and / or any temporary closures or traffic management to enable the Highway Authority to co-ordinate the network.* The Applicant notes that there is no reference to a permit in the New Roads and Street Works Act 1991 and assume that this is a general reference to notices and authorisations under that Act. However, all street works remain subject to the provisions of ss54-106 of the 1991 Act including any related requirements to give notice. The Applicant refers to Article 10(3) of the draft DCO which states: (3) The provisions of sections 54 to 106 of the 1991 Act(a) (save insofar as disapplied through the operation of article 49 (application, disapplication and modification of legislative provisions) and Part 1 of Schedule 17 (miscellaneous controls) to this Order) apply to any street works carried out under paragraph (1).

ExQ1	Question to	Question	Response
			The effect of declaring any street works to be undertaken under authority of a statutory right is to avoid the need for a licence to be obtained under s50, and to clarify that in undertaking such works, the undertaker will not be committing a criminal offence under s51. If the County Council are referring to the need for authorisations under the 1991 Act, the Applicant confirms that, for the avoidance of doubt, these are not affected by Article 10. *13.11 It would be helpful for this article to explicitly linked to the protective provisions.* The Applicant does not agree as there many powers the dDCO which are regulated by protective provisions and the Applicant does not consider it necessary to make a specific reference in this particular instance. The Applicant has, however, amended the definition of "specified works" in the newly updated Part 6 of the protective provisions relating to highway works for which the County Council is the highway authority to clarify that street works under articles 10 and 11 would be subject to the protective provisions. The protective provisions included in the dDCO submitted at Deadline 1 (App Doc Ref 2.1 Rev 05) are revised provisions based upon the County Council's s278 agreement wording and these provisions are being discussed with the Council. *Alterations to streets (Article 11 and Schedule 4)* *13.12 The schedule should clearly state which streets are public highways and which are not.* The Applicant reiterates its response under Article 10 above which is relevant here. *13.13 It would be helpful for this article to make direct reference to the protective provisions* The Applicant reiterates its response under Article 10 above which is relevant here. *<u>PROW (Article 13)</u>* *13.14 The undertaker should be required to issue CCC with a schedule of proposed temporary closures. Alternatively, this could be provided for within the Construction Traffic Management Plan (CTMP).* The detail of the closures sought by the Applicant is already contained in the DCO Schedule and so it isn't considered that any further schedule will be needed. If a PROW is to be closed which has not been identified, this must be agreed with the highway authority (article 13(1)(b)). *13.15 The undertaker should be required to seek CCC approval before enacting any closures. The Council would request that this be added to this article.* The Applicant notes that the draft DCO already requires approval of temporary closures where the Applicant and the County Council need to agree a diverted route as it has not been identified in Schedule 6 and on the rights of way plans (as per Article 13(1)(b)). The Applicant submits that the DCO is the mechanism for approval of the closures in Schedule 6 and therefore it should not be required to seek further consent. However, the Applicant is happy to notify the County Council of closures prior to them occurring and has made this amendment in the draft DCO at Article 13(5) as follows: *The undertaker must provide written notice to the relevant highway authority of any closure. Closure must not be effected earlier than the expiry of 14 days from the date of the receipt of the notice by the relevant highway authority.* This change is shown in Document 2.1 Draft Development Consent Order (Rev 5) (Clean) and 2.1 Draft Development Consent Order (Rev 5) (Tracked) submitted at Deadline 1. The change is also noted in Document 2.4 DCO Changes Tracker (Rev 3) (Clean) and 2.4 DCO Changes Tracker (Rev 3) (Tracked).

ExQ1	Question to	Question	Response
			13.16 Article 13(4) covers creation of new PROW. The creation of new PROW should be subject to highway authority protective provisions like any other highway. There is only one proposed new PROW which is a new bridleway between Low Fen Drive Way and Station Road (work 38) shown on sheet 6 of the Rights of Way Plan (document 4.6.6, AS-017). The Applicant and landowner's preference is that this route is delivered as a permissive bridleway, secured for 30 years in alignment with the provision of the permissive paths on the proposed WWTP site described in the LERMP. I. If a permissve path agreement can be agreed then the powers to create new public bridleway rights set out in the dDCO would not need to be exercised. The County Council is currently opposed to the delivery of this route through a permissive path agreement because it would not deliver the proposed improved connectivity in perpetuity. Notwithstanding this point, if the bridleway were to be delivered as a PRoW under the DCO powers the Applicant does not agree that the PROW should be governed by protective provisions. Its creation would not require protections for the Council as it would operate, in common with other local rural bridleways, merely as a public route across land using the existing track surface *Accesses (Article 14)* *13.17 The construction or alteration of any access that joins the highway should be covered by the Protective Provisions. It is not immediately clear that this is covered in the DCO. CCC should have the right under the DCO to approve the design, construction and completion of any new access, which includes the need for street lighting as part of the design* The Applicant is content with this suggestion and has amended Article 14 to include the following new sub-paragraph (4): *(4) Works to create a permanent access which:* *(a) join a highway maintainable at the public expense; and* *(b) which are specified in column (3) of Schedule 7 as for being required for the purposes of operation and maintenance of the authorised development,* *must be completed in accordance with the provisions of Part 6 of Schedule 15 (protective provisions).* This change is shown in Document 2.1 Draft Development Consent Order (Rev 5) (Clean) and 2.1 Draft Development Consent Order (Rev 5) (Tracked) submitted at Deadline 1. The change is also noted in Document 2.4 DCO Changes Tracker (Rev 3) (Clean) and 2.4 DCO Changes Tracker (Rev 3) (Tracked). *Maintenance (Article 15)* *13.18 There should be a 12-month maintenance period from the issue of the Provisional Certificate when the works are completed. Upon final certification the street works become highway maintainable at public expense.* This is dealt with in Article 15 and the protective provisions as follows: Article 15 states 15.—(1) The highway works must be completed in accordance with the provisions of Parts 5 and 6 of Schedule 15 (protective provisions). 1. With effect from the date of the final certificate referred to in paragraph 11 of Part 5 and paragraph 10 of Part 6 of Schedule 15 the highway works to which that certificate relates will be maintained by and at the expense of the relevant highway authority. 2. Where new land not previously part of the public highway is the subject of a provisional certificate under paragraph 7 of Part 5 or Part 6 of Schedule 15 then it is deemed to be dedicated as art of the public highway on the issue of that certificate.

ExQ1	Question to	Question	Response
			The protective provisions then state: Defects period 9.— (1) The undertaker must at its own expense remedy any defects in the specified works as are reasonably required by the local highway authority to be remedied during the defects period within 4 weeks of receiving notification of the same or such other time period as is agreed. (2) Following the issue of the provisional certificate the local highway authority has responsibility for maintenance of the highway. The defects period is defined as s the period from the date of the provisional certificate to the date of the final certificate which shall be no less than 12 months from the date of the provisional certificate Final Certificate 10.— (1) The undertaker must apply to the local highway authority for the final certificate no sooner than 12 months from the date of the provisional certificate. "final certificate" means the certificate relating to those aspects of the specified works that have resulted in any alteration to the local highway to be issued by the local highway authority pursuant to paragraph 10; The effect of this is that following the 12-month maintenance period and the issuing of the final certificate, the land will become adopted highway. However, as discussed at Issue Specific Hearing 1, the Applicant was reviewing the protective provisions with a view to revising them to reflect the County Council's s278 wording. Amended protective provisions were sent to the County Council on 10 November 2023. Any necessary amendments to this Article 15 will also be included once those provisions have been agreed.
10.7	Applicant	Article 19 (1) – should this be made subject to para (3) and (4)?	The Applicant drafted this article in line with the model provisions. However, upon reviewing made development consent orders, can see that this article (discharge of water) has been made subject to the sub-paragraphs which restrict when the undertaker may discharge water and when it may make openings into public sewers or drains. The Applicant therefore considers it appropriate to make the change noted by the Examining Authority. The Applicant has made this change, and it is shown in Document 2.1 Draft Development Consent Order (Rev 5) (Clean) and 2.1 Draft Development Consent Order (Rev 5) (Tracked). The change is also noted in 2.4 DCO Changes Tracker (Rev 3) (Clean) and 2.4 DCO Changes Tracker (Rev 3) (Tracked).
10.8	Applicant	A30 – this article relates to subsoil more than 7 metres beneath the surface (with the relevant plots listed in Sch 11). Please explain the reason for this land being shown as pink (freehold acquisition) on the Land Plans [AS-151].	The Applicant notes that this was discussed at Issue Specific Hearing 1 and refers to paragraph 2B.6.1 of the Post-Hearing Submission Note. Having considered this Article further, the Applicant has set out below an example of its operation to assist the Examining Authority: Whilst the permanent freehold acquisition of the surface or sub-surface land shallower than 7 metres is not permitted, Article 30(3) expressly permits the acquisition of new rights and the imposition of restrictive covenants over the land for the purposes specified in column (3) of Schedule 11. The purposes of the new rights and restrictive covenants in column (3) of Schedule 11 refer to the packages of rights and restrictive covenants which are more fully described in Schedule 10. For example, the Transfer Tunnel Restrictive Covenant is required to protect the entirety of the Waste Transfer Tunnel. The power is therefore sought to impose the Transfer Tunnel Restrictive Covenant over all of the land specified in Schedule 11 to the dDCO. Furthermore, there are areas where the proposed Waterbeach Pipeline will

ExQ1	Question to	Question	Response
			be laid above the Waste Transfer Tunnel, such as Plots 012a and 012m (Land Plans Sheet 1) (Document 4.4.1 [AS-151]), and therefore the Applicant requires the acquisition of the Waterbeach Pipeline Rights and the Waterbeach Pipeline Restrictive Covenant over that land, in addition to the acquisition of the subsoil for the Waste Transfer Tunnel.
10.9	Applicant	A35(9)(a) and (b) appear to provide for the CA of rights over land / CA of subsoil in respect of land identified for TP only (as set out in Sch 12). Please justify such powers and clarify to what extent persons affected are likely to be aware of this?	The Applicant notes that this was discussed at Issue Specific Hearing 1 and refers to paragraphs 2B.6.3 - 4 of the Post-Hearing Submission Note. For the avoidance of doubt, the following amendment has been made to Article 35(9) of the DCO and is recorded in the DCO Changes Tracker: *(9) The undertaker may not compulsorily acquire under this Order the land referred to in paragraph (1)(a)(i) except that the undertaker is not to be precluded from—* *~~(a) acquiring new rights or imposing restrictive covenants over any part of that land under article 28 (compulsory acquisition of rights and imposition of restrictive covenants);~~* *~~(b) acquiring any part of the subsoil of (or rights in the subsoil of) of that land under article 29 (acquisition of subsoil only) or article 30 (acquisition of land limited to subsoil lying more than 7 metres beneath surface);~~* *(c)carrying out protective works under article 20 (protective works to buildings and structures); or* *(d) carrying out a survey of that land under article 21 (authority to survey and investigate the land).* Although not discussed at the hearing, the Applicant has also amended Schedule 12 with the addition of the word 'only' so it is now entitled 'land of which temporary possession **only** may be taken'. This is to reflect the fact that the Applicant is not seeking the permanent acquisition of land or rights/restrictive covenants over the land listed in Schedule 12 (namely the land-coloured green land on the Land Plans). As above, this has been amended in the latest version of the draft DCO submitted at Deadline 1. The changes above are shown in Document 2.1 Draft Development Consent Order (Rev 5) (Clean) and 2.1 Draft Development Consent Order (Rev 5) (Tracked). The changes are also noted in 2.4 DCO Changes Tracker (Rev 3) (Clean) and 2.4 DCO Changes Tracker (Rev 3) (Tracked).
10.10	Applicant	A44(b) – Please further justify this power and explain any potential consequences for navigation / river users given the extent to which Work No. 32 extends over the River Cam?	It is necessary to permanently extinguish rights of navigation along the river Cam over those stretches of the river where permanent infrastructure is installed with the consequence that it will no longer be possible to exercise such rights of navigation either safely or at all over that area. This power to extinguish navigation rights applies solely to land coloured pink on the Land Plans, i.e. land (which includes bodies of water) over which permanent freehold compulsory acquisition powers are sought to enable the acquisition of all interests in the land. Article 44(b) operates so as to extinguish the navigation rights at the point that the Applicant actually acquires any part of the pink land within the river Cam. It does not permit the permanent extinguishment of navigation rights in relation to the taking of temporary possession of land, the acquisition of new rights/restrictive covenants over land (blue land on the Land Plans), or that part of the river which is shaded yellow on the Land Plans and is subject only to the powers in Articles 31 and 21 of the dDCO to interfere with private rights. The permanent outfall structure to be constructed pursuant to Work No. 32 – OUTFALL - and may be sited anywhere along that part of the river bank which is situated within Work No.32 as shown on the Works Plans, however the Applicant will only acquire the freehold ownership to that part of land where the outfall structure is actually constructed, with a suitable protective buffer. As explained in response to ExQ1.8.39, and as discussed during ISH1 and, the Applicant has reviewed and refined the land rights sought in respect of the river Cam and Land Plan Sheet 2 (App Doc Ref 4.4.2, [**AS-151**]) has been updated and submitted by the Applicant at Deadline 1. The scope of land Plot 019a over which permanent freehold compulsory acquisition powers are sought has been significantly reduced to 2 metres. In this location, the river Cam is approximately 24 metres wide. The remainder of plot 019a is now coloured blue and re-labelled as 019n. It will be subject to permanent new rights and a restrictive covenant only. Article 44(b) does not permit the permanent extinguishment of navigation rights over that blue land.

ExQ1	Question to	Question	Response
			The area over which navigation rights will be permanently extinguished will therefore be very small and the Applicant's position is that this will not prevent the meaningful enjoyment of navigation along the river Cam.
10.11	Applicant	A44 – given this article relates to rights, please explain why it is within Part 6 rather than Part 5 of the dDCO?	Article 44 is concerned with statutory and/or presumed public rights of navigation over the river Cam that are exercisable in accordance with the statutory controls and powers of the Cam Conservancy pursuant to the legislation referred to in Article 44. It also permits the disapplication of legislation. The powers of compulsory acquisition in Part 5 of the dDCO concern the acquisition of or interference with private property rights (which may include a private right of navigation insofar as any exist). Compulsory acquisition powers cannot disapply legislation or affect statutory or public navigation rights. Part 6 is therefore the correct place for Article 44.
Questions / comments relating to Requirements (R)			
10.12	Applicant, CCC, SCDC	Where requirements are to be discharged by *the relevant planning authority*, please clarify how this would occur efficiently and with the whole project bearing in mind there may be some crossover between CCC and SCDC? Would there be a need for these authorities to work together to discharge requirements and if so, is this reflected in the dDCO [AS-139]?	The Applicant has amended the definition of relevant planning authority to: "relevant planning authority" means the waste authority from time to time for the area within which the relevant part of the authorised development is to be constructed, used, or maintained, or power under this order is to be exercised; This definition covers both Cambridgeshire County and Cambridge City Council as the relevant waste authorities for those parts in the Order limits within their administrative boundaries. There can only be one relevant planning authority at any one time. Should the relevant planning authority, want to consult with the other planning authorities, it may do so, but it is not proposed to prescribe this via the drafting of the DCO. The Applicant has, however, made limited references to consultation with other bodies in the requirements where Natural England and the Environment Agency specifically require consultation on particular elements.
10.13	Applicant	Is R7 of the dDCO sufficiently detailed or should it, for example, include provision for further detail, such as sizes, species, hard and soft details etc.?	The Applicant considers that R7 is sufficiently detailed. The details listed by the Examining Authority as examples will come through the submission of the details under each of the relevant headings in Requirement 7(1). If the relevant planning authority did not consider that sufficient detail had been provided, it can request this from the Applicant, noting that the details must be approved before the Applicant commences. The Applicant notes that similar approaches were taken in The Northampton Gateway Rail Freight Interchange Order 2019 (Schedule 2, Requirement 8) and The East Midlands Gateway Rail Freight Interchange and Highway Order 2016 (Schedule 2, Requirement 6).
10.14	Applicant	R8 and R9 – Please explain: a) the relationship between the CoCP and the Construction Environmental Management Plan; and b) whether the CoCP is in outline and if so, whether a detailed version is required.	a) The Applicant notes that that this was discussed at Issue Specific Hearing 1 and refers the Examining Authority to paragraph 2B.14.1 of the Post-Hearing Submission (App Doc Ref 8.6). However, in order to assist the Examining Authority further, the Applicant has summarised the CoCP and the CEMP, their purposes, what they contain and to provide some examples of how the two documents work alongside each other. CoCP (App doc ref 5.4.2.1 and 5.4.2.2, [APP-068 and AS-161 and 162)) The CoCP describes the standards and measures, based upon current legislation and best practice, which will be adopted by the Applicant and its principal contractors to manage, mitigate and monitor potential impacts during the construction phase of the Proposed Development

ExQ1	Question to	Question	Response
			The CoCP comprises 2 parts, Part A: General requirements and Part B site-specific measures. Part A of the CoCP sets out overarching and general principles including the following: • legislative requirements, guidelines and Best Practice Measures to be implemented and followed during construction; • where relevant obligations which will be imposed upon the Principal Contractor(s), subcontractors and suppliers when undertaking work on behalf of the Applicant; and • plans, control measures and monitoring procedures for managing potential environmental impacts relating to the construction period. Paragraph 2.1.5 of the CoCP Part A summarises Part B as follows: Part B of the CoCP sets out site specific measures that supplement and refine the general requirements in Part A. The need for site specific measures for certain locations is due to the varying factors, including, but not limited to, the presence of sensitive receptors which require specific mitigations measures and the need for specific construction activities or construction methodologies not widely used across the rest of the Proposed Development. <u>CEMP</u> CEMPs are to be developed on a per phase basis and in accordance with Requirement 9. The detailed CEMPs will be designed to manage compliance with relevant environmental legislation and the mitigation measures set out in the ES (Mitigation Tracker (Doc 5.4.2.6, AS-055 and AS-056) and the Commitments Register (Doc 7.10, AS-125). The detailed CEMPs will also direct compliance with the consents, licences, permits and approvals associated with the construction phase which are listed in the Consents and other Permits Register (Doc 7.1, AS-123 and AS-124). A framework of what the CEMP will look like was submitted to the ExA at the Procedural Deadline on 29 September (App Doc Ref 5.4.2.7, [AS-057]). It is not intended that a detailed CEMP be prepared at this stage nor referred to in the draft DCO. <u>What is the relationship between the CoCP and the CEMP?</u> The CoCP applies to the entirety of the construction of the authorised development and essentially provides a framework for the CEMP and each of the sub-plans. The CoCP is, in effect, an outline CEMP in all but name. Unlike the CoCP, CEMPs are to be developed and approved on a per phase basis. Each detailed CEMP will form a simple to use and practical document translating the measures which are captured as commitments within the CoCP into concise measures specific to the different phases and locations of the Proposed Development and will therefore need to build on the detail in the CoCP, for example: *Construction roles* – 3.1 Section 6 of the Code of Construction Practice Part A (App Doc Ref 5.4.2.1, [APP-068]) sets out the construction roles and responsibilities. – The detailed CEMPs will include an organogram showing names, roles, responsibilities and communication methods for each of the construction roles *Training* – Section 5.2 of the Code of Construction Part A (App Doc Ref 5.4.2.1, [APP-068]) sets out the commitments to the training methods and materials which will be used during the construction phase for staff and contractor training and site inductions.

ExQ1	Question to	Question	Response
			– The detailed CEMPs will form a key management tool used in both training exercises and the site induction. It will include as a minimum a copy of the site induction, templates and fact sheets used for training exercises and site briefings and toolbox talks. *Working hours* – CoCP Part A sets out the different categories of working and provides a description of activities either included or excluded from those working hours – The detailed CEMPs will set out the final agreed working hours in the same table format as that provided within Section 5.10 of the CoCP b) The CoCP is not a draft document, nor is it in outline. It will not be refined further beyond the Examination. The Applicant does not consider that a detailed version is required as detail will come through the CEMPs. As stated above, the CoCP forms the framework for the CEMPs.
10.15	Applicant	R9(2)(a) – Please clarify what is included in the enabling phase and the reasons this is separated out from other phases?	The enabling phase is a defined term in Schedule 2, Part 1. These works are carved out for inclusion as they are required to enable the development and mobilise the site ready for the main construction works. Given the development programme the aim of identifying an initial phase is to facilitate a start on site being made as soon as reasonably practicable. Paragraph 3.1.2. of the Project Description (App Doc Ref 5.2.2, [APP-034]) explains the phases of the authorised development as follows: *The phases comprise: Phase 1 Enabling works (the 'Enabling Phase' as described in the dDCO); Phase 2 Enabling works; construction of the proposed WWTP & STC; connecting infrastructure & supporting development; landscape masterplan development; Waterbeach pipelines; commissioning and decommissioning.* These phases are then listed in further detail in Table 3-1 and the subsequent paragraphs of the chapter. The Applicant's approach has been to divide 'enabling works' into two phases because the activities which are within the two phases overall comprise what would constitute a typical "enabling phase" of construction works. Due to the project programme, the Applicant requires the ability to deliver some early works which are minor in nature and would not need extensive requirement discharge. This is referred to as "Phase 1 Enabling Works" or "enabling works (phase 1)" in the Project Description and it is this phase 1 which comprises the "enabling phase" in the DCO, as defined in Part 1 of Schedule 2. The Phase 2 Enabling Works do not form part of the "enabling works" for the purposes of the DCO, these will simply be another phase of development which will need to be explained in the written scheme of phasing submitted pursuant to Requirement 3. The Applicant has refined the definition of "enabling phase" in the DCO (Part 1 of Schedule 2) in the dDCO submitted at Deadline 1 (App Doc Ref 2.1 Rev 05) to refer to paragraph 3.4.1 of the Project Description in addition to paragraph 3.1.6 and has also added some additional wording to more closely align with the description in the chapter. Additionally, the Project Description has been updated to ensure the types of activities envisaged by the enabling works are reflected (App Doc Ref 5.2.2 Rev 03). Please also refer to the Applicant's response to ExQ1.10.5 for further explanation on the carving out from certain requirements of the enabling phase, and to the response to ExQ1.10.25.
10.16	Applicant	R10 – should the construction outfall management and monitoring plan (R10(1)) and the operational outfall management plan (R10(4)) make provision for consultation with any other bodies, such as the Environment Agency, Natural England and the Conservators of the River Cam (noting NE's RR [RR-015])?	As confirmed at Issue Specific Hearing 1, the Applicant is content with the principle of the relevant planning authority consulting with Natural England and the Environment Agency.

ExQ1	Question to	Question	Response
			The Applicant has made this change to Requirement 10 and it is shown in Document 2.1 Draft Development Consent Order (Rev 5) (Clean) and 2.1 Draft Development Consent Order (Rev 5) (Tracked). The change is also noted in 2.4 DCO Changes Tracker (Rev 3) (Clean) and 2.4 DCO Changes Tracker (Rev 3) (Tracked). The Applicant does not propose to consult the Conservators and proposes to leave this to the discretion of the relevant planning authority. Where works are in or over the river Cam or interfere with the navigation of the river Cam, the Conservators have the benefit of the protective provisions. This requires the Conservators to approve the detailed design and work programme for such works.
10.17	Applicant	R11 – should this requirement make provision for consultation with any other bodies, such as the Environment Agency and Natural England (noting NE's RR [RR-015])?	As confirmed at Issue Specific Hearing 1, the Applicant is content with the principle of the relevant planning authority consulting with Natural England and the Environment Agency. The Applicant has made this change to Requirement 11 and it is shown in Document 2.1 Draft Development Consent Order (Rev 5) (Clean) and 2.1 Draft Development Consent Order (Rev 5) (Tracked). The change is also noted in 2.4 DCO Changes Tracker (Rev 3) (Clean) and 2.4 DCO Changes Tracker (Rev 3) (Tracked).
10.18	Applicant	R13 relates to an archaeological investigation mitigation strategy (AIMS). Should it refer to being in accordance with measures set out in the CoCP (as, for example, R9 does) as well as the outline AIMS?	The Applicant does not consider this necessary as Requirement 8 (CoCP) provides that each phase must be undertaken in accordance with the code of construction practice in so far as it relates to the works proposed in the relevant phase and further, where a document referred to in the code of construction practice is submitted for approval to the relevant planning authority under a requirement specified in this Part of this Schedule the submitted document must accord with details specified in the code of construction practice for that document in so far as those details relate to works proposed in the relevant phase. 7.3.11 of the COCP refers to the AIMs and states that the mitigation measures set out elsewhere within the CoCP will help to reduce and mitigate the potential impact of the development upon the historic environment. In light of the above, when submitting the AIMS, the Applicant is also required to comply with Requirement 8.
10.19	Applicant	R16 – Natural England [RR-015] suggests that this requirement should make provision for reporting, investigation and remediation of water contamination in addition to land-based contamination. Please address this and amend the dDCO as necessary.	The Applicant has added a new Requirement 22 (outline water quality monitoring plan). The purpose of this requirement is to make provision for reporting, investigating and remediating water contamination. As stated at Issue Specific Hearing 1 (see paragraph 2B.18.2 of the Post-Hearing Submission Note (App Doc Ref 8.6)), the Applicant has been liaising with the Environment Agency and is now in a position to submit a draft outline water quality monitoring plan (App Doc Ref 5.4.20.13) and this is included with the Applicant's Deadline 1 submissions. This draft plan is approved in principle by the Environment Agency and a final draft is being reviewed. This will be discussed with Natural England, once it has been approved in principle by the Environment Agency.
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?	Pursuant to Requirement 9(2)(b), where the construction environmental management plan relates to any phase other than the enabling phase, the plan must include or be accompanied by the specified management plans relating to the works proposed in that phase. Sub-paragraph (xiv) requires a detailed decommissioning plan where the relevant phase includes decommissioning which must accord with the outline decommissioning plan. As such, the detail around decommissioning including timescales, which will be dealt with as part of the detailed plan. However, the Applicant cannot specify a maximum duration as the decommissioning process involves a number of other stakeholders and is dependent upon the requirements of the environmental permitting regime which will regulate decommissioning. This is detailed in the outline decommissioning plan (App Doc Ref 5.4.2.3, [AS-051]). The environmental permits which the Applicant currently operates pursuant the EPR regime do not have a specified end date because they permit an activity. The permit ceases once the activity is deemed to be completely at an end with a compliant decommissioning process. There is an incentive on the Applicant to carry out the

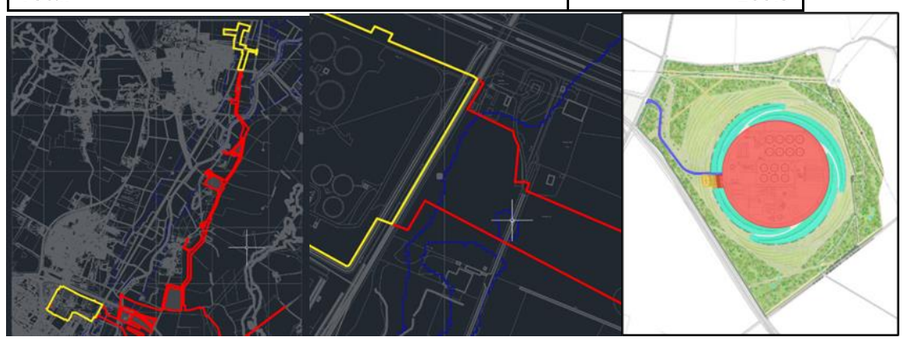
ExQ1	Question to	Question	Response
			decommissioning process expediently. Were the Applicant not to or it was left indefinitely it would be in technical breach of its environmental permits.
10.21	Applicant	R20(3) – should this be in accordance with the *approved detailed* odour management plan?	The purpose of paragraph (3) is to secure compliance with the detailed odour management plan as approved and therefore the Applicant agrees with the ExA that it is appropriate to make the suggested change. The Applicant has made this change, and it is shown in Document 2.1 Draft Development Consent Order (Rev 5) (Clean) and 2.1 Draft Development Consent Order (Rev 5) (Tracked). The change is also noted in 2.4 DCO Changes Tracker (Rev 3) (Clean) and 2.4 DCO Changes Tracker (Rev 3) (Tracked).
10.22	Applicant	R21(1) – should this be *approved* in writing rather than 'agreed' in writing?	In order to ensure consistency with the other Requirements, the Applicant agrees with the ExA that it is appropriate to make this change. The Applicant has made this change, and it is shown in Document 2.1 Draft Development Consent Order (Rev 5) (Clean) and 2.1 Draft Development Consent Order (Rev 5) (Tracked). The change is also noted in 2.4 DCO Changes Tracker (Rev 3) (Clean) and 2.4 DCO Changes Tracker (Rev 3) (Tracked).
10.23	Applicant	R21(4) – should this be in accordance with the *approved* detailed carbon management plan?	The purpose of paragraph (4) is to secure compliance with the detailed carbon management plan as approved and therefore the Applicant considers it appropriate to make the suggested change. The Applicant has made this change, and it is shown in Document 2.1 Draft Development Consent Order (Rev 5) (Clean) and 2.1 Draft Development Consent Order (Rev 5) (Tracked). The change is also noted in 2.4 DCO Changes Tracker (Rev 3) (Clean) and 2.4 DCO Changes Tracker (Rev 3) (Tracked).
10.24	Applicant	R22 – please provide the outline operational water quality management plan.	This is now named the Outline Water Quality Monitoring Plan. This is because it relates to both the operational and construction phases. As a result, Requirement 9 has been amended so that the construction water quality management plan must accord with this outline plan. Similarly, Requirement 22 now provides that the operational water quality monitoring plan must accord with the outline plan. The draft outline plan is submitted at Deadline 1 (App Doc Ref 5.4.20.13). This has been agreed in principle with the Environment Agency and a final version is now being reviewed by them. Once this has been approved, Natural England will review and the final outline plan will be submitted to the Examination at Deadline 2 which will include any amendments required as a result of the EA's final approval.
Questions / comments relating to Schedules (Sch)			
10.25	Applicant	Sch 2, Part 1 - The enabling works as defined refer to paragraph 3.1.8 of ES Chapter 2 [APP-034]. However, it appears that the correct paragraph is 3.1.6. In addition, paragraph 3.1.7 of ES Chapter 2 also specifies further enabling works which do not appear to have been mentioned in the Sch 2, Part 1. Please clarify.	The Applicant amended the definition of 'enabling works' to correct the paragraph reference in the draft DCO submitted with the change request on 16 October 2023. This can be seen in Document 2.1 Draft Development Consent Order (Rev 4) (Clean) and 2.1 Draft Development Consent Order (Rev 4) (Tracked). The change is also noted in 2.4 DCO Changes Tracker (Rev 2) (Clean) and 2.4 DCO Changes Tracker (Rev 2) (Tracked). Phase 1 Enabling Works comprise the early works to construct the access road and construction compound for the main works site at the proposed, new wastewater treatment works, including fencing and temporary car parking, as well as establishment of part of the Waterbeach pipeline north (up to 50m). These are specific works which have been carved out as being necessary for site mobilisation. The Phase 2 Enabling Works described in paragraph 3.1.7 concern a separate set of works with a different estimated timescale and which do not form part of the "enabling phase" for the purpose of Part 1 of Schedule 2 – those will be covered through the phasing requirement as will the rest of the phases of development.
10.26	CCC, SCDC	Sch 2, Part 2, 1(2)(a) and (b) – please confirm whether you are content with the specified 42-day time period for discharging requirements?	The Applicant would note that Part 2 of Schedule 2 follows Planning Inspectorate Advice Note 15, Appendix 1, which specifies the period of 42 days. Further, the Applicant considers that this timeframe is reasonable in order to ensure that prompt delivery of the authorised development can be achieved.
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?	The Applicant has considered this but is of the view that building in a time period specifically for consultation is not necessary. Should the relevant planning authority need to consult, this will be factored into the 42 days as per paragraph 1(2). Should further time be required, this can be agreed in accordance with paragraph 1(3).

ExQ1	Question to	Question	Response
			Further, the Applicant notes that the drafting follows PINS model drafting in Advice Note 15, Appendix 1. Given the scale of the development and in order not to delay delivery of a nationally significant infrastructure project, the Applicant proposes to retain the model wording in order to ensure swift discharge of the requirements and other details which require approval.
10.28	Applicant	Sch 3 is titled 'Streets subject to street works' but the table includes a number of public rights of way in addition to streets – please explain the reasons for this?	Schedule 3 concerns 'streets'. As explained below, a 'street' may also be a public right of way. 'Street' is defined in Section 48(1) of the NRSWA 1991 as: In this Part a "street" means the whole or any part of any of the following, irrespective of whether it is a thoroughfare— (a)any highway, road, lane, footway, alley or passage, (b)any square or court, and (c)any land laid out as a way whether it is for the time being formed as a way or not. Section 48(2) states: (2) The provisions of this Part apply to a street which is not a maintainable highway subject to such exceptions and adaptations as may be prescribed. The Applicant has reviewed Schedule 3 and considers that the public rights of way referred to also fulfil the definition of a street and therefore need to benefit from the powers in Article 10. For this reason, the Applicant considers their inclusion in Schedule 3 to be appropriate.
10.29	Applicant	Sch 3 and Sch 4 - CCoC's RR [RR-001] requests these schedules differentiate between public highways and others. Please address and update the schedules as necessary.	The drafting of Schedule 3 follows convention and the standard approach to drafting for those schedules. It is not clear why identification of adopted highway is needed as it does not relate to the interpretation of the article. As stated above, a street may or may not be a public highway. The Applicant is concerned that inserting reference to whether or not a street is currently adopted highway could create potential confusion in the future should the position of that change, but more importantly does not consider it to be necessary to the operation of the provision. In light of this, the Applicant has not made this change.
10.30	Applicant	Sch 14 – throughout this schedule it is specified that finished ground level would be + or – 0.5m either side of the maximum parameter (which, for example, would be 9.5m above ordnance datum (AOD) for the terminal pumping station). On this basis, it would seem that a maximum parameter for the terminal pumping station would be 10.0m AOD. If so, would it provide greater clarity to present the information in this way?	The Applicant included reference to Finished Ground Level (FGL) following pre-application discussions with the Planning Inspectorate where it was evident that references to AOD alone were thought to be potentially confusing. The areas in question are large areas of land and due to the undulating nature of the land, a tolerance of + or - 0.5m has been included because it would be impracticable to refer to one level. The maximum parameters of the infrastructure are as described in the schedule and these are mutually exclusive of the ground level, the FGL is included only for relative height. The Applicant has not changed the drafting of the Schedule at this stage however if the ExA considers that the inclusion of FGL has the potential to cause confusion, the Applicant is content to remove FGL and only refer to the parameters relative to AOD.
10.31	Applicant	Schedule 14 (Parameters) - [RR-061] refers to inconsistencies between some submission documents and this schedule, for example the limits of deviation shown in Design Plan document [APP-024]. Please address this.	The Applicant has reviewed APP-024 (App Doc Ref 4.10) which deal with the Gateway building and workshop against the Parameters Schedule and acknowledges that the plan is inconsistent with the schedule and also the Project Description (Chapter 2 of the Environmental Statement App Doc Ref 5.2.2 [APP-034]) in the following manner: 1. The Gateway building should be described in the DCO Schedule and the Project Description as having maximum parameters of 58.2m x 17.1m, as per the design plan. These changes have been made to the dDCO and updated Project Description Chapter submitted at Deadline 1.

ExQ1	Question to	Question	Response
			2. The Workshop parameters in the dDCO and Project Description are larger than those on the design plan but the Applicant has retained these parameters since they reflect the worst case of what could be built. The Design Plan – Buildings App Doc Ref 4.10 [APP-024] is not secured through the DCO and is provided for information as to how the design might look and therefore the plan has not been updated. The Applicant confirms that the Environmental Statement assesses the parameters stated above.
10.32	Applicant	Sch 15 (protective provisions) - Planning Inspectorate Advice Note 15 states that *If Protective Provisions for more than one protected party are included in a single Schedule, SI drafting requires the numbering of the para to follow sequentially throughout the Schedule and not re-start at '1' with each part (as with all textual Schedules in several parts). This approach should be adopted in the dDCO submitted with the application and in each amended draft submitted during the Examination where Protective Provisions are changed.* Please amend Sch 15 to align with good practice.	The Applicant notes that the Examining Authority raised this as part of its Procedural Decision dated 10 August 2023. The Applicant responded in the DCO Changes Tracker (Document 2.4, AS-012) and respectfully requests that if sequential numbering is required, that it can be added in the final version of the DCO to be submitted, for the reasoning set out in the DCO Changes Tracker.
10.33	Applicant	Schedule 15 Part 6 - CCoC's RR [RR-001] refers to protective provisions for its benefit as Local Highway Authority and requests these are amended to address compensation, timescales for certification and PRoW. Please address this and amend the protective provisions as necessary.	The Applicant has transposed the County Council's precedent section 278 into the protective provisions, albeit some changes have had to be made to the drafting given the different use of language in a statutory instrument and bilateral agreement, as a section 278 would be. However, the Applicant is satisfied that the protective provisions offer the same protection to the County Council as a section 278. In relation to the PRoW, please see the response at ExQ1.10.6. The Applicant does not propose that the PRoW (Work No. 38) is dealt with via the protective provisions as it will be dealt with via a permissive path agreement.
10.34	Applicant	Sch 17(3) - This appears to seek to disapply building regulations for all buildings. However, [AS-123] suggests building regulations would be applied for in respect of the Gateway Building. Please clarify.	The Applicant notes that this was discussed during Issue Specific Hearing 1. This is documented in paragraphs 2B.22.2 - 4 of the Post-Hearing Submission Note (App Doc Ref 8.6). The Applicant can confirm that paragraph 3 of Schedule 17 has been removed and that it does not seek to disapply building regulations. This change is shown in Document 2.1 Draft Development Consent Order (Rev 5) (Clean) and 2.1 Draft Development Consent Order (Rev 5) (Tracked) submitted at Deadline 1. The change is also noted in Document 2.4 DCO Changes Tracker (Rev 3) (Clean) and 2.4 DCO Changes Tracker (Rev 3) (Tracked).
10.35	Applicant	Sch 17(5) - This appears to seek to disapply the Community Infrastructure Levy Regulations in respect of all buildings by deeming them ones in which people do not normally go or go in only to fix plant or machinery. Would this include the Gateway Building, and if so, please justify this power in respect of it.	The Applicant notes that this was discussed during Issue Specific Hearing 1. This is documented in paragraphs 2B.23.1 - 4 of the Post-Hearing Submission Note (App Doc Ref 8.6). The Applicant has now redrafted Schedule 17(5) so as to disapply the CIL Regulations in their entirety as follows: *This Order shall not constitute a planning permission for the purpose of Part 11 of the 2008 Act (community infrastructure levy) notwithstanding the definition of planning permission contained within article 5 of the 2010 Regulations (meaning of planning permission).* This change is shown in Document 2.1 Draft Development Consent Order (Rev 5) (Clean) and 2.1 Draft Development Consent Order (Rev 5) (Tracked) submitted at Deadline 1. The change is also noted in Document 2.4 DCO Changes Tracker (Rev 3) (Clean) and 2.4 DCO Changes Tracker (Rev 3) (Tracked). During the hearing, in response to a point that CIL isn't generally disapplied for DCOs with buildings, the Applicant confirmed that CIL has been disapplied in strategic rail freight DCOs. For completeness, the Applicant can confirm that similar provisions are included in the Northampton Gateway Rail Freight Interchange Order 2019 No. 1358 (article 45), the West Midlands Rail Freight Interchange Order 2020 No. 511 (article 44) and The Boston Alternative Energy Facility Order 2023 No. 40 (article 40).

ExQ1	Question to	Question	Response
10.36	Applicant	Sch 19 – please keep this up to date at each deadline having regard to any revised documents submitted during the Examination.	The Applicant notes that Examining Authority's request and will keep Schedule 19 updated as needed. For the purposes of Deadline 1, the Applicant has made some changes to Schedule 19 which are shown in Document 2.1 Draft Development Consent Order (Rev 5) (Clean) and 2.1 Draft Development Consent Order (Rev 5) (Tracked). The changes are also noted in 2.4 DCO Changes Tracker (Rev 3) (Clean) and 2.4 DCO Changes Tracker (Rev 3) (Tracked).
Explanatory Memorandum (EM)			
10.37	Applicant	Please update the EM as necessary.	The Applicant has updated the Explanatory Memorandum to address the changes made to the draft DCO since the original application submission. The changes are shown in 2.2 Explanatory Memorandum (Rev 3) (Clean) and 2.2. Explanatory Memorandum (Rev 3) (Tracked).

11. Green Belt

ExQ1	Question to	Question	Response
11.1	Applicant	**Proposed Development** Please set out in a table which elements of the Proposed Development the Applicant considers would be inappropriate development and which elements would not be inappropriate development in the Green Belt (noting, for example, that the Planning Statement [AS-166] and Green Belt Assessment [APP-207] do not appear to mention the Gateway Building / visitor centre in this regard).	The total area of land contained within the Draft Order Limits is 209 hectares. The land at Milton west of the railway line and at Waterbeach north of Bannold Road totalling 48.1 hectares is outside the Green Belt boundary. The remaining 160.9 hectares are within the Cambridge Green Belt. The Proposed Development within this area can be broken down as follows: **Area (ha)** Area of development inside the bund including the discovery centre (orange): 20.6 Area of the earth bank (green): 10.0 Area of the car park and circulation area (yellow): 0.4 Area of the access road (blue): 0.5 Area of Sewer Outfall (App Doc Ref 4.13.4 and 4.13.5): 0.0 Remainder (for engineer works, pipeline, compounds, landscaping): 129.4 **Total**: **160.9**  Note: The habitat drawing in the DAS (App Doc Ref 7.6 - AS-168) shows gaps in earth bank as part of the area of calcareous grassland being primarily for ventilation. The extent to which any part of the Proposed Development which falls within the Green Belt is considered to be 'inappropriate development' (in NPSWW paragraph 4.8.10 terms) is addressed at paragraphs 4.8.34 – 4.8.35 of the Planning Statement (App Doc Ref 7.5).

ExQ1	Question to	Question	Response
			Given the 'Rochdale Envelope' approach adopted in this application, not all of the land included within the draft Order Limits will be developed. The construction of new buildings should be regarded as inappropriate unless falling within the exceptions listed in paragraph 149 NPPF. None of the Proposed Development is excepted under paragraph 149. Paragraph 150 NPPF identifies certain other forms of development which are also not inappropriate in the Green Belt "*provided they preserve its openness and do not conflict with the purposes of including land within it*" including "*b) engineering operations"* and "*c) local transport infrastructure which can demonstrate a requirement for a Green Belt location*". Once constructed, and the landscape and visual impacts reversed, the **pipeline and connecting infrastructure** would preserve the openness of the Green Belt and would not conflict with the purposes of including land within it[1]. [1] These works are capable of delivery under pd rights given CCC's EIA Screening opinion confirming this would not be EIA development Whilst the **discharge point (outfall)** comprises a concrete structure (of c. 55sq.m surface area) it would substantially be underground with only the top visible at ground level. The area around the structure will be landscaped and there would be no security fence. It would appear as a normal riparian feature which would preserve the openness of the Green Belt and would not conflict with the purposes of including land within it. **Access roads (and small surface level car parks)** which are sensitively designed and landscaped are not unusual in Green Belt and, where they demonstrate a requirement for a Green Belt location being necessary ancillary development (eg in this instance to serve the proposed WWTP) are capable of being considered not inappropriate. So far as the **proposed woodland, hedgerows, tree planting, meadows and recreational routes** shown on the landscape masterplan (within the LERMP App Doc Ref 5.4.8.14 - AS-066) do not comprise development, they are not be considered to be inappropriate development. However, the **proposed WWTP and surrounding earth bank** (as a substantial structure in its own right) do not fall within the exceptions set out at NPPF paragraphs 149 and 150 and must, accordingly, be considered to be inappropriate development and, consistent with NPSWW paragraph 4.8.10 must be "*by definition, harmful to the Green Belt and should not be approved except in very special circumstances*".
11.2	Applicant	**Effects** How has the Applicant sought to minimise the amount of inappropriate development in the Green Belt and to minimize its visual impact?	The strategic objectives of the Project include "*to reduce the visual impact of the proposed WWTP on the nearby villages of Fen Ditton, Horningsea and Stow-cum-Quy as far as is practicable*" and to arrange the Proposed Development "*so as to minimise impact on the environment and local communities as far as is practicable*" (see section 2.5 DAS – App Doc Ref 7.6 - AS-168). For each of the key process selection decisions required throughout the outline design phase for the proposed WWTP and associated development and connecting infrastructure, several different factors were considered for 'good design' including visual impact, land take as well as community and societal impacts (paragraph 2.7.2, DAS). As described under the heading 'Optimising Land Take' (paragraph 6.3.1 DAS), the masterplan has sought to minimise the total land take for the development. This includes minimising land required for development through efficient planning, and optimising the area around it to integrate the development into the countryside and best mitigate its impact on the landscape and Green Belt. The consideration given in the design process to siting, plant footprint, layout options, the selection of the rotunda solution, how the length of the access road has been minimised and sympathetic treatment of taller structures having regard to Green Belt and landscape setting are described in sections 6.3 - 6.12 and 7.1 - 7.7 of the DAS. The proposed green infrastructure, including the earth bank planting, woodland blocks, hedgerows and hedgerow trees, are essential components of the visual mitigation strategy. The significant area of green infrastructure would provide screening and help to reduce the visual impact of the Proposed Development and, because this area surrounds the proposed WWTP, it would serve to retain openness and contribute to reducing the effect on the openness of the Green Belt. Chapter 5 of the Green Belt Assessment [App Doc Ref 7.5.3 - APP-207] describes the mitigation

ExQ1	Question to	Question	Response
			measures incorporated in the design of the Proposed Development to reduce harm to the Cambridge Green Belt.
11.3	Applicant	**Quantum of development** How would the size and volume of the proposed WWTP compare with the size and volume of the existing WWTP?	Comparison of the area occupied by the proposed WWTP to the existing WWTP is evident in the top image at section 6.4 DAS (App Doc Ref 7.6 - AS-168). The volumes of the two WWTP's are not entirely comparable as the proposed works is designed to treat a greater forward flow to treatment and to a higher standard than the existing WWTP currently does so requires the proposed WWTP to have a different volumetric profile than the existing WWTP. However, through the Applicants Risk Opportunity and Value (ROV) interventions, the maximum size/volume of all process elements was assessed to make sure it had the minimal amount of visual, footprint and carbon impact in relation to cost and process safety/security. This process that was followed for all process option selections has meant the proposed WWTP is as compact as possible for the design outcomes it set out to achieve. The considerations which have informed the design of the new water recycling centre and sludge treatment centre are described at sections 9.5 and 9.10 of the DAS [AS-168]. The proposed WWTP will conform to the latest standards and regulation regarding IED and discharges including an improved discharge consent meaning the proposed WWTP will treat more flows to a higher standard and have less impact on the environment (including odour). This means that some of the stacks and tanks are higher than on the existing WWTP. However, if the existing WWTP were to expand or adapt to achieve the same capacity and outputs as the proposed WWTP it will also need to fully comply with the same regulations and standards meaning any increase in height of stacks or tanks will be replicated to comply with those regulations and standards.
11.4	Applicant	**Discovery centre and parking** Please explain the need for the Discovery Centre and any other non-operational facilities being located in the Green Belt and justify the amount of proposed car parking.	The Discovery Centre is not a standalone building or asset. It is a part of the Gateway building and in normal operating conditions will work as a multi-functional meeting room(s). The primary difference will be the access and independence of these rooms for the desk space area can be internally segregated for when school aged children are visiting. Page 153 of the DAS [AS-168] shows how integrated the Discovery Centre is to the Gateway building and is the only part of the development that allows its personnel an area for large meetings.
11.5	Applicant	**Assessment** The Green Belt Assessment at para 6.1.6 [APP-207] identifies an overall level of 'moderate' harm to the openness of the Green Belt and to purposes of the Green Belt. As with other assessments which form part of the application, is this to be considered as a significant effect?	As addressed in ExQ 11.1, the Proposal Development is inappropriate development in the Green Belt, which is harmful by definition (4.8.38). The weight to be given to Green Belt harm is substantial (consistent with NPSWW paragraph 4.8.18 and NPPF paragraph 148). In addition, the Green Belt Assessment at paragraph 6.1.6 [APP-207] identifies there would be: • Harm to the openness of the Green Belt - Moderate • Harm to the purposes of including land in the Green Belt – Moderate These are considered to be significant effects.
11.6	Applicant, CCoC, CCC, SCDC	**Existing WWTP** The ExA notes that the remediation of the existing WWTP site and its redevelopment for housing are not secured through the dDCO and that the site is not formally allocated for such a purpose in the relevant development plan. On this basis, what weight should the ExA afford to its potential for any redevelopment and housing delivery as contributing to the very special circumstances needed to outweigh the harm to the Green Belt, and any other harm, by reason of the inappropriateness of the Proposed Development?	The weight that should be afforded to enabling housing delivery / urban regeneration as a benefit of the Proposed Development is substantial. The reasons for this assertion are set out in the answers to ExQ 2.15 and ExQ 2.17 (supported by related answers at ExQ 2.11 and 2.30 - 2.34).
11.7	Applicant	**Benefits** The Planning Statement at para 6.2.13 [AS-166] lists a number of reported benefits associated with the Proposed Development. To what degree could these be achieved if the WWTP were to remain at its current site?	See answer to ExQ 2.23. Many of the operational benefits of the Proposed Development could be achieved to some extent by further improvements to the existing WWTP but this would depend on funding. Improvements to storm resilience (from use of the new tunnel for attenuation) would not be possible and achievement

ExQ1	Question to	Question	Response
			of the same level of operational and capital cost efficiencies and operational carbon neutrality would be more difficult and may be delayed by availability of funding. The benefits from the decommissioning and release of the existing WWTP site to enable regeneration would not be achieved, nor would the quantum of habitat creation, improved access to the countryside, provision of accessible open spaces, enhanced education and recreational opportunities.
11.8	Applicant	**Benefits** How much energy would be produced by the Proposed Development to feed into the grid?	Currently the local grid connection is not capable of receiving a significant amount of exported energy. The current proposal only allows for the power generated to be used by the proposed WWTP.
11.9	Applicant	**Assessment** Some RRs (e.g. [RR-167]) make reference to the Applicant's Green Belt Assessment [APP-207] and its consistency with the Greater Cambridge Green Belt Assessment. Please provide a response to this.	The scope and methodology used by the Applicant to assess the impact of the Proposed Development on the Cambridge Green Belt is clearly set out in section 2 of the Green Belt Assessment [App Doc Ref 7.5.3 - **APP-207**]. It takes into account guidance on the assessment of the impact of a development on the openness of the Green Belt provided in paragraph 1 of the planning practice guidance (PPG) on Green Belt (2019) and highlights the difference in scope and approach of this assessment from that taken in the Landscape and Visual Impact Assessment (LVIA) of the Proposed Development (App Doc Ref 5.2.15 - **AS-034**). It is suggested in some RRs (eg point 7 - Harm to Heritage Assets and to the Green Belt – RR-167) that the methodology used by the Applicant "*may not be consistent with that of the Greater Cambridge Green Belt Assessment* [LUC 2021] *in paying attention to the detail, and … does not appear to show a satisfactory analysis of the reasons for the difference*". At paragraph 2.2.1 of the Applicant's Green Belt Assessment, the statement is clearly made that "*this assessment is informed by the findings of the Greater Cambridge Green Belt Assessment (LUC, 2021) and applies the methodology set out in Chapter 3 and the worked example in Appendix D of that assessment*", despite that assessment relating to potential release of broad areas of land at a wider scale. At paragraph 2.2.2, the difference between the assessment basis of the LUC 2021 study and the basis for the Applicant's site specific assessment is highlighted. Section 3 of the Applicant's Green Belt Assessment then summarises the assessment of the overall contribution to Cambridge Green Belt purposes of Green Belt land in the area of the Proposed Development as reported in the Greater Cambridge Green Belt Assessment (LUC, 2021). In section 4, the Applicant's Green Belt Assessment then defines the land parcel comprising the '*specific new development scenario*' to be investigated (as advocated by the LUC 2021 study) and then assesses the contribution that land parcel currently makes to the purposes of the Cambridge Green Belt, the impact of the development of the proposed WWTP on the Green Belt purposes of the site and adjacent Green Belt land parcels (as defined in the LUC 2021 study) and the resulting overall harm to the Green Belt that would potentially result from the development of the proposed WWTP in this location. Because the Proposed Development is a discrete development with a fully mitigated outline design (the landscape masterplan and LERMP are designed to reduce landscape and visual impacts, improve biodiversity and create opportunities for greater recreational use of the countryside), the Applicant's Green Belt Assessment is able to consider a finer level of granularity before reaching its conclusions. This approach is considered to be entirely reasonable and to provide a robust outcome which has informed the overall planning assessment of the Proposed Development provided in the Planning Statement (App Doc Ref 7.5 - **AS-166**).
11.10	Applicant	**Discovery Centre** Please clarify the demand for the Discovery Centre and provide examples of where such facilities have been successful and well used over a sustained period of time on other infrastructure projects.	The Applicants Education Centre at the Chelmsford Water Recycling Centre has on average 35 planned visits per year as part of its education programme. Within the water industry Welsh Water, Yorkshire Water and SES Water all operate successful education centres across their regions. Yorkshire Water reported in 2019 to receive on average 7,000 school children per annum to its 4 educational centres. Between March 2022 and April 2023 Welsh Water reported 2,697 participants visiting its education centre. SES Water operates a dedicated education centre at its Bough Beech Water Treatment Works called Flow Zone, over the course of the 2022 to 2023 Academic year 47 school visits were carried out. Outside of the water industry known infrastructure projects which operate similar facilities are:

ExQ1	Question to	Question	Response
			• MVV Environment an Energy from Waste Facility in Plymouth has a multi functional education centre which is also used as a meeting space for internal and external meetings. Based upon the organisations contractual round up for the year 2022 to 2023 they had over 4000 people visit site for waste education and site tours, 48 schools visit for STEM education and 25 community groups attend for technical tours; • Thalia Waste Management have an education centre at their Waterbeach Waste Management Park that is managed by Cambridgeshire County Council; and • EDF has visitor/education centres at 5 power facilities, Sizewell B visitor centre reported via its news bulletin in December 2022 to have received 55,000 visitors to its Visitor Centre since its opening in 2012.

12. Health

ExQ1	Question to	Question	Response
12.1	Applicant	**Policy – NPSWW** NPSWW states at para 3.10.1 that *Adequate provision of waste water infrastructure is clearly beneficial to society and to our health as a whole.* a) Is the existing WWTP adequate for existing and foreseeable future needs? b) If not, why not – and is it capable of being made adequate? What would need to be done to make it adequate? c) With regard to NPSWW para 3.10.2 and 3.10.3, please set out your opinion as to whether the health impacts would be lower, about the same, or greater if in the future waste water was treated at the existing WWTP site rather than the proposed WWTP site in particular in relation to: • traffic; • air pollution; • noise; • access to key public services (including Fen Ditton Primary School); • employment; and • use of open space and water for recreation and physical activity. If you consider it would assist in the assessment of the overall planning balance, please also add your opinion in relation to any other health impacts which are not enumerated in these paras of NPSWW but which you have identified in your ES, for example 'crime and public safety' (para 3.3.14 of Chapter 12 [APP-044]).	a) Yes, the existing WWTP is suitable for the existing needs and with modifications and investment will be able to meet foreseeable future needs. b) Not applicable given response to part a) of this question. c) The Applicant demonstrates project compliance with the NPSWW in the NPSWW Accordance Table (App Doc Ref 7.5.1) [**AS-130**]. The Applicant has reported the predicted effects on health, in-line with the requirements of the NPSWW in the ES Chapter 12: Health (App Doc Ref 5.2.12) [**APP-044**]. This identifies the significant health effects of the proposed WWTP at the proposed site, identifying the effects experienced by local receptors (people). This is consistent with EIA Regulations. No assessment has been undertaken of the existing WWTP or any theoretical changes to the existing WWTP to meet future needs. Assessing the continuity of the existing plant is not a relevant consideration as to whether or not to grant consent. Therefore, it is not possible or necessary to provide an evidenced-based opinion and comparison. The NPSWW Accordance Table (App Doc Ref 7.5.1) has been updated in respect of paragraphs 3.10.2 and 3.10.3 to reflect the above and is being provided at Deadline 1.
12.2	CCC	**Policy – local plan** Has the Applicant identified the correct 2018 Cambridge Local Plan policies at 1.3.4 of ES Chapter 12: Health [APP-044] for the purposes of assessing impacts on health? If not, which policies should be taken into account?	

ExQ1	Question to	Question	Response
12.3	SCDC	**Policy – local plan and SCDC SPD** a) Is the 'South Cambridgeshire District Council Local Development Framework, Health Impact Assessment, Supplementary Planning Document (Adopted March 2011)' referred to at 1.3.4 of ES Chapter 12 [APP-044] still in force? b) If yes, which 2018 Local Plan policy does this relate to? c) If yes, please provide a copy. d) Is the Applicant's HIA sufficiently comprehensive to address current policy? e) Has the Applicant identified and assessed the application against the correct 2018 Local Plan policies?	
12.4	CCoC	**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	
12.5	Applicant	**Mental Wellbeing Impact Assessment** In its RR [RR-002] CCC states *42. In respect of the mental health and wellbeing assessment, the City Council is satisfied that baseline measurements have been taken (page 13) however is it is noted that there is no specific reference in chapter 5.2 as to how mitigation would be secured, nor when further assessments would be undertaken to monitor change have been included. The City Council considers this information needs to be provided by the applicant.* *Please provide the requested information.*	Subsequent to RR-002 being published, the Applicant has prepared ES Appendix 12.3 Mental Wellbeing Impact Assessment (MWIA) (App Doc Ref 5.4.12.3) [**AS-077**], which does not identify potential significant effects that require further Mental Wellbeing Impact Assessments. Section 7 of ES Appendix 12.3 Mental Wellbeing Impact Assessment (MWIA) (App Doc Ref 5.4.12.3) [**AS-077**] provides further references to measures that will be implemented to avoid or reduce potential negative impacts. The appointed contractors will be required to implement the Code of Construction Practice (CoCP) Part A and B (App Doc Ref 5.4.2.1 & 5.4.2.2.) [**APP-068** and **AS-161**], which includes measures to prevent and minimise potential negative impacts such as noise levels, emissions, and visual impacts. The Applicant also refers to the application of the Community Liaison Plan (App Doc Ref 7.8) [**AS-132**], secured by Requirement 9 of the draft DCO (App Doc Ref 2.1) [**AS-139**], which will provide a conduit for the continued engagement with the community throughout the delivery of the Proposed Development. This would provide local residents and community members a forum to raise and address concerns including health and wellbeing matters.
12.6	Applicant	**Equality - Gypsies, Roma, Travellers** In its RR [RR-004] and in respect of Health, SCDC states: *66. The District Council notes that although the Gypsy, Roma, Traveller population have been scoped in as part of the assessment but, it is unclear from the stakeholder engagement if any proactive engagement was undertaken with this community. It is acknowledged that numerous stakeholders were approached with regards to the application, however little feedback was received in response. The District Council will therefore ask the ExA to require clarity on what if any further attempts were made to ensure input was received from as wide a range of stakeholders as possible.* In its RR [RR-001] and in respect of Health, CCoC states *6.4 The impact on the Gypsy and Traveller population has not been addressed within the Environmental Statement, Chapter 12, instead*	The Applicant considered and sought advice from South Cambridge District Council on the approach to engagement with the Gypsy, Roma and Traveller population. In December 2021 and January 2022, it was established that there had been previous engagement with this community via the Traveller Liaison Officer at South Cambridge District Council. Consultation was undertaken at Con 1 (between July and September 2020) and additional materials were hand delivered by the council to the Fen Road traveller site, as well as posters and information materials being left at deposit locations. Fen Road traveller site received direct mailings regarding the project and consultation events. The engagement leads were supporting engagement via the Traveller Liaison Officer but by January 2022 had not received an update on engagement activities. The Applicant has continued to notify the Traveller Liaison Officer at South Cambridge District Council, including most recently providing notice as per Section 56 of the Planning Act 2008.

ExQ1	Question to	Question	Response
		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. Please respond to the authorities' comments and explain, with justification, whether or not you consider it necessary to undertake further consultation with these groups to ensure compliance with equalities duties.	At request of South Cambridge District Council, there was no direct engagement with this particular group due to the sensitivity of the group and the importance of having a known point of contact to support meaningful engagement. The Applicant accepts that further consultation with the Gypsy, Roma and Traveller community in the local area would be beneficial and will continue to liaise with the Traveller Liaison Officer at South Cambridge District Council to ensure this group are included as part of any ongoing consultation and engagement activities.
12.7	Applicant	**Existing WWTP – pests** How would any impacts from pests be minimised and mitigated during decommissioning and after the existing WWTP site has been decommissioned, pending any redevelopment?	The Applicant scoped out potential health effects from increases in pests due to the implementation of mitigation and management processes as set out in the CEMP. This is set out in section 3.7.2 of the Scoping Opinion (App Doc Ref 5.4.4.1) [**APP-079**]. The Applicant has set out in Table 5-2 of ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [**APP-048**] that, during decommissioning, pests would be mitigated by controls required by the existing environmental permit, which sets out conditions relating to the management system that cover waste management practices and procedures as well as compliance with the Waste (England and Wales) Regulations 2011 (as amended). The requirements of the existing environment permit will continue to prevail during the decommissioning phase.
12.8	Applicant	**Existing WWTP – decommissioning phase impacts** In its RR (para 6.6-6.8) [RR-001] CCoC raises concerns around a range of matters relating to health impacts, including: decommissioning process details and timelines; decontamination responsibility; community safety; potential leachates from tank holes; temporary odour control / scrubbers; and fugitive emissions from cleaning processes. In addition CCC's RR [RR-002] raises concerns around decommissioning phase duration details and mitigation and potential for anti-social behaviour following decommissioning and prior to any redevelopment. Please respond to these comments and provide additional analysis as appropriate.	The Applicant's assessments within the ES are based on activities at the existing WWTP up until the site is decommissioned. Activities after this and before redevelopment are not part of the Proposed Development or included within the DCO, and therefore have not been assessed within the ES. The Applicant has reported health effects for decommissioning in section 4.4 of ES Chapter 12: Health (App Doc Ref 5.2.12) [**APP-044**]. This specifically considers changes to health and wellbeing due to an increase in noise, air quality, dust, odour, traffic and visual effects; potential risk to human health from water pollution; and potential risk to human health from hazardous waste and substances and does not identify any significant health effects as a result of a range of decommissioning activities. ES Appendix 2.3 Outline Decommissioning Plan (App Doc Ref 5.4.2.3) [**AS-051**] sets out the proposed decommissioning activities. No further significant health effects in relation to these decommissioning activities have been identified. Responses to specific points raised by CCoC in their Relevant Representation [**RR-001**] are contained within Table 3-3 in the Applicant's Response to Relevant Representations (App Doc Ref 8.2).
12.9	Applicant	**Proposed ventilation stack at the existing WWTP** In its RR [RR-001] CCoC states that *The Environmental Statement, Chapter 12, needs to include consideration of the* "ventilation stack" *which is to be installed on the existing site at the interception shaft. The impacts should be assessed for future residential receptors. It is unclear if the stack will be removed if/or when the site is redeveloped and therefore how long it will be in situ.* Please respond to this comment, in particular: a) whether such an assessment should be undertaken in the absence of an adopted development plan allocation for residential development; b) in the event that a residential allocation is adopted, the extent of land that could have to be excluded from that allocation – please indicate this on a map and also indicate the location of this on the draft policies map covering the proposed NEC allocation; and c) if an assessment of the effects on future residential receptors should be undertaken, which potential effects would need to be explored.	The Applicant does not agree that the ES Chapter 12: Health (App Doc Ref 5.2.12) [**APP-044**] needs to consider the vent stack. The presence of the vent stack was considered qualitatively within ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-50**] and no significant effects were identified. The Applicant confirms that the tunnel vent located at the interception shaft at the start of the transfer tunnel within the existing Cambridge WWTP will be a permanent vent stack inclusive of a carbon filter, extending to a height of up to 10m above ground level and an adjacent filter installation at ground level for odour control. The design of the tunnel vent includes a carbon filter explicitly to minimise odour release whilst the 10m vent stack itself will help maximise the distance between source and receptors and will improve dispersion, reducing odour concentrations, over a vent at ground level. Landsec U+I is well aware of the need to incorporate the ventilation stack into the master plan for the future redevelopment of the vacated site. The area around the proposed location of the ventilation stack is identified as a 'no residential zone' and instead suitable for commercial uses. The development capacity of the area vacated by the relocation is therefore unaffected and remains well able to accommodate the level of development anticipated in the Regulation 19 version of the NECAAP.

ExQ1	Question to	Question	Response
12.10	Applicant	**Proposed WWTP – construction phase effects in Fen Ditton** At para 4.2.32 of ES Chapter 12 [APP-044] it is stated that *In the community of Fen Ditton, additional traffic and congestion is likely to occur for a period of up to 24 months along Horningsea Road, the adjoining roads of High Ditch Road and Ditton Lane. In these locations construction noise and lighting may also be noticeable from some locations…* The submitted Construction Traffic Management Plan (CTMP) [AS-109] does not describe the use of High Ditch Road and Ditton Lane as part of the construction routes, nor are they illustrated as construction routes on Figure 12.1 (PDF page 2 of 9) in ES Book of Figures Health [APP-059]. Please explain why High Ditch Road and Ditton Lane would experience additional traffic and congestion during construction, and the expected type and volume of additional traffic.	The Applicant will amend ES Chapter 12: Health (App Doc Ref 5.2.12) [**APP-044**] to remove reference to High Ditch Road and Ditton Lane as these roads will not used as construction routes. ES Chapter 12: Health (App Doc Ref 5.2.12) [APP-044] should read as follows: "In the community of Fen Ditton, additional traffic and congestion is likely to occur for a period of up to 24 months along Horningsea Road. In this location construction noise and lighting may also be noticeable from some locations..." This error has been acknowledged in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1.
12.11	Applicant	**Proposed WWTP – education / Fen Ditton primary school** In its RR [RR-001] CCoC states that *There are concerns that the disruption to access to services, particularly education have not been consistently addressed. In Table 2-8 in the Environmental Statement Chapter 12 [APP-044], it states changes to road layout or volumes of traffic are unlikely to significantly affect access to education, and therefore scoped out of any further assessment. However, earlier in the Health Chapter it states* "changes in access to local services (Fen Ditton School) – during construction" *will be an effect. More information is needed to ensure a good access is maintained throughout the construction phase.* Please endeavour to agree with CCoC, by way of the proposed SoCG, a satisfactory position in relation to school access during the construction phase.	The Applicant has assessed the health effects on Fen Ditton Primary School within ES Chapter 12: Health (App Doc Ref 5.2.12) [**APP-044**]. In section 4.2.58 to 4.2.65 of ES Chapter 12: Health (App Doc Ref 5.2.12) [**APP-044**], it has been concluded there may be a slight adverse effect on walkers and cyclists accessing Fen Ditton Primary School, due to construction activity associated with the proposed WWTP. The effect is not expected to be significant as construction activities are not anticipated to create any delays and due to segregation between construction activity and walkers and cyclists. Measures to mitigate the effect are outlined in section 4.2.63. Walkers and cyclists would be expected to include pupils, parents and staff. The school access topic and the record of the outcome of discussions will be recorded in the Statement of Common Ground with CoCC.
12.12	Applicant	**Proposed WWTP – mental health impacts** The ES has identified mental health effects during the operational phase e.g. in terms of employee mental health (para 2.2.14 of ES Chapter 12 [APP-044]) and *Changes to how local people feel about their community, in particular their sense of place and wellbeing, including mental health* (page 29 of the same document). A RR [RR-207] notes that *As a long term resident of Horningsea I am specifically concerned about the impact this plan is having on the mental health of so many residents. There is a feeling of despair. Many residents feel trapped – they feel they cannot cope with staying with the disruption that will ensue for many years, yet they cannot sell their houses. This is leading to an overwhelming depression. The worst thing is that this plan is totally unnecessary as the works could remain where they are in Milton.* This RR relates to the pre-operational period. Is this a consideration that ought to be assessed as part of ES Chapter 12 ES? Please justify your response and, if relevant, quantify the effect.	Where RR-207 refers to the period pre-operation and the associated disruption, the Applicant has interpreted this as meaning the construction phase. The Applicant has prepared ES Appendix 12.3 Mental Wellbeing Impact Assessment (MWIA) (App Doc Ref 5.4.12.3) [**AS-077**], which covers all phases. No significant health effects on mental health have been identified. Predicted significant health effects during construction are set out in ES Chapter 12: Health (App Doc Ref 5.2.12) [**APP-044**].
12.13	Applicant, CCC	**Cumulative effects – Cambridge North Residential Quarter** a) Please provide the reference number for the application noted at para 3.5.16 of ES Chapter 22 [AS-044].) b) Has that application been determined? If yes, please provide details including a record of the decision, the Officer's report and site layout plan(s) showing the boundary of the site. Para 3.5.18 of ES Chapter 22 states: *In addition, there are significant beneficial health effects during operation on accessible housing, housing mix and affordability, walking and cycling, open space, play space and access to nature, and local employment.* c) How would the Proposed Development provide *significant beneficial health effects* during operation on accessible housing, housing mix and affordability?	a) The planning application reference is 22/02771/OUT. b) No. This application has been appealed on grounds of failure by Cambridge City Council to determine the application in the requisite time (APP/W0530/W/23/3315611). A public inquiry was held on 6 June 2023 and a decision is awaited from the Secretary of State. c) The Proposed Development would not provide direct significant beneficial health effects during operation on accessible housing, housing mix and affordability. It would facilitate the delivery of such benefits through the redevelopment of a strategic brownfield site as envisaged in the draft NECAAP which would be enabled by the Proposed Development. The extent of those benefits could not be achieved within NEC if the Proposed Development is not consented because the retention of the existing WWTP and the safeguarding zone around it would continue to prevent the delivery of housing in this area. The impact of the retention of the existing WWTP on the realisation of the development envisaged in the draft NECAAP is addressed in the response to ExQ1 2.31 f) and ExQ1 2.32.

ExQ1	Question to	Question	Response
		If this application for the proposed WWTP is not consented, could those *significant beneficial health effects* on accessible housing, housing mix and affordability be achieved in another way? Please justify your response.	
12.14	Applicant	**Proposed WWTP - East of England Ambulance Service NHS Trust (EEAST) resources** EEAST's RR [RR-012] indicates that that the Proposed Development would have significant resource implications for the organisation. Please endeavour to agree with EEAST the resources that it considers would be needed and how these would be secured in the event that development consent is granted.	The Applicant scoped out changes to access to health, social care and educational services during operation as set out in section 3.7.3 of the Scoping Opinion (App Doc Ref 5.4.4.1) [**APP-079**]. The Applicant has engaged with EEAST as part of the Emergency Services Technical Working Group to discuss this concern. The concern relates to the potential for large numbers of out of area workforce being brought in for the construction period. This would potentially impact on health resources. The Applicant has confirmed that the majority of the workforce (75%) will be local therefore the Applicant does not consider this would have a significant impact on resources given these individuals are already allocated within the catchment. This concern can be managed by good communications with EEAST and advanced notification of timing of construction. This is recorded in the combined SoCG for the Emergency Services.
12.15	Applicant, CCC, SCDC	**Proposed WWTP – mitigation measures** In relation to the operational phase of the proposed WWTP, on page 74 of ES Chapter 12 [APP-044] it is stated that the potential risk to human health from water pollution would be dealt with in documents which form part of the Construction Environmental Management Plan (CEMP). Given that the CEMP would relate to the construction phase, is this the most appropriate mechanism to deal with operational phase effects? If not, how should this be dealt with / secured?	The Applicant will update Table 5-2 within ES Chapter 12: Health (App Doc Ref 5.2.12) [**APP-044**] to remove reference to CEMP for potential risk to human health from hazardous waste and substances and replace with reference to the Site Management Waste Plan (SWMP).
12.16	Applicant	**Proposed WWTP – mental health impacts** The RR of South Cambridgeshire District Council [RR-004] states that *In respect of the mental health and wellbeing assessment as part of this Chapter of the ES, the District Council is satisfied that baseline measurements have been taken (page 13). However, it is noted that no specific reference has been included in chapter 5.2 of this chapter as to how mitigation would be secured or when further assessments would be undertaken to monitor change. The District Council considers this information needs to be provided and secured by DCO requirement.* Do you agree with SCDC's suggested use of a Requirement in relation to this matter? If yes, please draft a Requirement and endeavour to agree it with SCDC. If not, please explain why you do not agree.	The Applicant has prepared ES Appendix 12.3 Mental Wellbeing Impact Assessment (MWIA) (App Doc Ref 5.4.12.3) [**AS-077**], which does not identify potential significant effects that require further Mental Wellbeing Impact Assessments. Section 7 of ES Appendix 12.3 Mental Wellbeing Impact Assessment (MWIA) (App Doc Ref 5.4.12.3) [**AS-077**] provides further references to measures that will be implemented to avoid or reduce potential negative impacts. The appointed contractors will be required to implement the Code of Construction Practice (CoCP) Part A and B (App Doc Ref 5.4.2.1 & 5.4.2.2.) [**APP-068** and **AS-161**], which includes measures to prevent and minimise potential negative impacts such as noise levels, emissions, and visual impacts. The Applicant also refers to the application of the Community Liaison Plan (App Doc Ref 7.8) [**AS-132**], secured by Requirement 9 of the draft DCO (App Doc Ref 2.1) [**AS-139**], which will provide a conduit for the continued engagement with the community throughout the delivery of the Proposed Development. This would provide local residents and community members a forum to raise and address concerns including health and wellbeing matters.

13. Historic environment

ExQ1	Question to	Question	Response
13.1	Historic England, CCoC, CCC, SCDC	**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.	

ExQ1	Question to	Question	Response
13.2	Applicant	**Effects** ES Chapter 13 [AS-030] assesses all reported adverse effects on designated heritage assets, even those which would be moderate adverse and thus significant, as 'less than substantial harm' to the significance of the asset. Please clarify how this term has been defined and determined.	The Applicant has determined harm in accordance with all available relevant guidance, as set out in ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) [**AS-030**], and the NPSWW (2012) and NPPF (2023). Harm has been determined using the following process. Measuring harm is a qualitative, rather than a quantitative exercise. There is limited guidance on how to assess harm (including no guidance from Historic England or the Chartered Institute for Archaeologists), this is in part down to the need for the harm to be assessed individually for each scheme and even for each designated asset that is affected. For EIA assessments (including DCOs), the qualitative assessment takes the assessment undertaken to establish the level of significance effect, including understanding the heritage value (significance) of the asset and the nature of impact, and through using professional judgement (and the below criteria), an assessment of the level harm is reached. The NPSWW (2012) and NPPF (2023) set out harm as; • substantial harm (which includes total loss), • less than substantial harm; or • no harm. **Substantial Harm** • Substantial harm usually covers physical impacts to a designated heritage asset (even minor impacts, when balanced against the significance of the asset). However, depending on the circumstances, it may still be that the physical impacts to designated heritage assets may be considered less than substantial harm or even at the lower end of less than substantial harm. For example, where inappropriate additions to historic buildings are removed. • Substantial harm may also be caused by impacts to the setting of an asset, where impacts lead to the complete removal of setting or highly significant change in how the character of the asset is appreciated, or where it changes the viability or use of the asset (taking into the account the significance of the asset and the importance the setting to its overall value). **Less than substantial harm** • Less than substantial harm does not mean that the harm is not significant. A large/very large adverse (significant) effect can be assessed as being less than substantial harm, rather than substantial harm, depending on the asset and the nature of the harm. The reversibility or temporary nature of effects may therefore result in less than substantial harm in a harm test. • Planning policy does not provide guidance on setting the level of less than substantial harm, but does indicate that the significance of the asset needs to be taken into account. • Case law (particularly James Hall V The City of Bradford (2019)) has indicated that there is a spectrum of harm (for less than substantial harm) and that even negligible impacts still cause less than substantial harm. • However, even though there is a spectrum of harm, policy and case law are clear that the level of harm can only be defined at the lower or higher ends of less than substantial harm. **No harm** • No harm is understood where there is no impact, and therefore no effect, to a heritage asset. • It is also understood where there is only positive change (beneficial effects) to a heritage asset. Where an asset experiences both adverse and beneficial effects 'no harm' cannot be reported as an asset does experience harm. **CWWTPR Harm Test**

ExQ1	Question to	Question	Response
			As the Proposed Development does not involve direct physical impacts to the identified listed buildings and the majority of the works proposed (affecting the key assets) to be undertaken within the Conservation Areas (Bites Lock and Fen Ditton) and close to Listed Buildings (Biggin Abbey and Poplar Hall) are reversable, it was therefore determined (in line with the NPSWW and NPPF) that none of the identified impacts would cause substantial harm. Therefore, the identified impacts on the designated assets (including permanent construction moderate adverse effects) have been determined as causing less than substantial harm.
13.3	Applicant	**Effects** The ES Chapter 13 summary on pages iv and v [AS-030] concludes that there would be no residual effects during construction and operation. However, could effects on designated heritage assets which are identified as 'less than substantial harm' be considered a residual effect?	The Applicant has understood residual effects as those which are predicted to remain following mitigation. These therefore can, and have, been identified in relation to less than substantial harm. In line with policy all effects, even non-significant residual effects, have been assessed as causing harm. The Applicant identifies in ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) [**AS-030**] that there would be no significant residual effects from temporary construction impacts or from operation impacts on the designated heritage assets, after mitigation. The Applicant has clarified these points in an updated ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) provided at Deadline 1. Section 4 of the ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) [**AS-030**] reports the following permanent construction residual effects, after mitigation on designated heritage assets. Slight adverse residual effects on Baits Bite Lock Conservation Area (HE095) and Horningsea Conservation Area (HE097) and a permanent moderate adverse residual effect to Biggin Abbey (HE011).
13.4	Applicant	**Baseline** ES Chapter 13 para 3.1.19-23 [AS-030] consider the 'built heritage' baseline and mention Poplar Hall Grade II listed building. Why does this section not mention Biggin Abbey Grade II* listed building given that it has been considered elsewhere?	The Applicant has not included Biggin Abbey in paragraphs 3.1.19 to 3.1.23 of ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) [**AS-030**] as this section discuses-built heritage assets directly within the Order Limits. Poplar Hall is discussed in this section as although it and its immediate surrounds are excluded, its grounds are surrounded by the Order Limits.
13.5	Applicant	**Heritage assets** ES Chapter 13 para 2.9.13 [AS-030] refers to 'Red House Close'. However, Red House Close is not mentioned elsewhere in ES Chapter 13 and nor does Red House Close (HE1404 on [AS-047]) appear to be included in Table 1.4 of ES Appendix 13.4 [AS-085] (along with other non-designated heritage assets mentioned in Table 1.8 of ES Appendix 13.2 [AS-081]. Please explain the reason for this and review Tables 1.4 and 1.8 as necessary.	The Applicant has included Red House Close in paragraph 2.9.13 of ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) [**AS-030**] to indicate that the mitigations measures have been put in place to mitigate the impacts of the Proposed Development on the heritage asset. As the impacts on the asset are not considered to be significant, they are not discussed in the chapter but have been assessed in the production of ES Appendix 13.4 Historic Environment Impact Assessment Tables (App Doc Ref 5.4.13.4) [**AS-085**]. An updated version of ES Appendix 13.4 Historic Environment Impact Assesrment Tables (App Doc Ref 5.4.13.4) has been provided at Deadline 1, as it was identified that assets 1311 – 1329 (archaeology), and 1400 – 1408 (built heritage) had not been included in the submitted version.
13.6	Applicant	**Heritage assets** ES Chapter 13 para 3.1.19-23 [AS-030] do not appear to identify the number of listed buildings within the 1km study area (of which there appear to be many according to Figures in [AS-047]), as they do for other built heritage assets. Please: a) clarify the number of listed buildings in this regard; and b) clarify why they have not been considered further in the assessments, as have been explained for those listed buildings outside the 1km study area though within the wider ZTV (i.e. in para 3.1.22).	The Applicant has identified 90 listed buildings within the 1km study area. All listed buildings within the 1km study area have been assessed and all impacts are reported ES Appendix 13.4 Historic Environment Impact Assessment Tables (App Doc Ref 5.4.13.4) [**AS-085**]. Only significant effects and effects on key heritage assets (designated assets that have been identified by stakeholders and through professional judgement due to their significance and/or potential for harm) are reported in ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) [**AS-030**]. The Applicant has clarified these points in an updated ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) provided at Deadline 1.
13.7	Applicant	**Terminology**	The Applicant has identified designated historic landscape assets as conservation areas and registered parks and gardens. This has been explained in the ES Appendix 13.1 Historic Environment Baseline

ExQ1	Question to	Question	Response
		ES Chapter 13 para 3.1.24 [AS-030] mentions 'designated historic landscape assets'. Is this referring to conservation areas? If so, is it accurate to identify them as designated historic landscape assets and might this be unclear to the general reader?	Report (App Doc Ref 5.4.13.1) [**AS-079**], but a clarification has been added to the updated ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) provided at Deadline 1.
13.8	Applicant	**Construction** ES Chapter 13 para 4.2.15 [AS-030] suggests there would be construction works in the north of Horningsea Conservation Area. However, Figure 13.4 [AS-047] indicates that the Order limits do not extend into this conservation area. Please clarify.	The Applicant refers in paragraph 3.1.24 of ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) [**AS-030**] to the presence of noise impacts within the northern part of the conservation area, from construction works which are within its setting but are not within the conservation area itself. The Applicant has clarified this in an updated ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) provided at Deadline 1.
13.9	Applicant	**Construction** Some RRs raise concerns around construction traffic through Horningsea Conservation Area and Fen Ditton Conservation Area. ES Chapter 13 [AS-030] indicates such traffic would be routed around these areas and would be secured in the CoCP and CTMP [AS-109]. Please clarify where this is specified / secured within the CoCP and CTMP submitted with the application, noting that 'Figure 3.1' (Vehicle Routing Plan) as referenced in the CTMP does not appear to have been included within the document?	The Applicant acknowledges that the Vehicle Routing Plan is Figure 4.1, rather than Figure 3.1, in the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) [**AS-109**]. The Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [**APP-068**], which as per Requirement 8 of the draft DCO (App Doc Ref 2.1) [**AS-139**] each phase must be undertaken in accordance with, states at paragraph 7.6.2 that construction works shall be carried out in accordance with the measures set out in the CTMP (App Doc Ref 5.4.19.7) [**AS-109**]. Within the CTMP (App Doc Ref 5.4.19.7) [**AS-109**], Figure 4.1 clearly shows that construction traffic would route around Fen Ditton Conservation Area and Horningsea Conservation Area. Section 4 of the CTMP (App Doc Ref 5.4.19.7) [**AS-109**], articulates the routes which the construction vehicles will take to reach the different elements of the Proposed Development, which accords with Figure 4.1 and with monitoring and enforcement of these routes set out within Section 7 of the CTMP (App Doc Ref 5.4.19.7) [**AS-109**].
13.10	Applicant	**Effects** ES Chapter 13 para 4.2.59 [AS-030] refers to *Eye Hall (HE080), Barn to East South East of Eye Hall (HE081) and Granary to East of Eye Hall (HE082) (all Grade II listed and of high heritage value)*. Please clarify the significance of effect on these designated heritage assets, as it is unclear from para 4.2.62 to 4.2.64, and the reasons they are not listed in Table 5-1 of ES Chapter 13 or mentioned elsewhere in this chapter (e.g. baseline section)?	The Applicant has described these assets within ES Appendix 13.1 Historic Environment Baseline Report (App Doc Ref 5.4.13.1) [**AS-079**] and ES Appendix 13.2 Gazetteer of Assets (App Doc Ref 5.4.13.2) [**AS-081**]. Only significant effects and effects on key heritage assets are reported in ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) [**AS-030**], all impacts are reported within ES Appendix 13.4 Historic Environment Impact Assessment Tables (App Doc Ref 5.4.13.4) [**AS-085**]. Paragraphs 4.2.62 to 4.2.64 of ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) [**AS-030**] describe that the effects discussed within this section are negligible to slight and not significant.
13.11	Applicant	**Effects** ES Chapter 13 [AS-030] reports a number of temporary and permanent adverse construction effects. Does this mean that the permanent adverse construction effects would prevail throughout the operational period, given their permanence, and would thus be residual effects?	The Applicant identifies, in line with the methodology detailed in ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) [**AS-030**], that permanent adverse construction effects are effects that remain in place on completion of the construction of the Proposed Development and prevail throughout operation. The level of residual effect is then assessed following application of the in scheme designed mitigation.
13.12	Applicant	**Policy** The NPPF sets out that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation and that any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting), should require clear and convincing justification. Additionally, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. NPSWW reiterates these points. Please identify what you consider to be the public benefits which the ExA should take into account.	The Applicants assessment of the heritage impacts of the Proposed Development is addressed in ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) [**AS-030**] and considered against NPSWW policy and NPPF policy at Section 4.10 of the Planning Statement (App Doc Ref 7.5) [**AS-166**]. The identified impacts on the designated assets (including moderate adverse effects) have been determined as causing less than substantial harm. In the context of that harm, the justification for the Proposed Development and the public benefits that will arise from it are set out in sections 2.1 to 2.2 and their adequacy considered under the 'very special circumstances' in section 6.2 of the Planning Statement (App Doc Ref 7.5) [**AS-166**). These can be summarised as: ***Environmental benefits*** through the delivery of a new modern, low carbon waste water treatment facility: • significantly reducing carbon emissions (from being operationally net zero and energy neutral)

ExQ1	Question to	Question	Response
			• improving storm resilience (by making storm overflows and CSOs less likely to occur) • improving the quality of recycled water returned to the River Cam (by reducing concentration in final treated effluent discharges of phosphorus, ammonia, total suspended solids and BOD) • maximising public value and supporting the circular economy (by more efficiently and effectively recycling and re-using waste water in the interests of public health) • restoring and enhancing the surrounding environment (by increasing biodiversity by a minimum 20% complementing local initiatives such as the Cambridge Nature Network and Wicken Fen Vision) • substantially reducing the number of homes and properties within the area which may potentially experience odour (when compared to the equivalent area for the Proposed Development) The commitment to higher energy efficiency, on-site renewable energy provision, high standards of design and sustainable transport measures are clear environmental benefits, representing a move towards a low carbon economy and promoting more sustainable means of travel. These are key objectives of the NPSWW and the NPPF and are environmental benefits. ***Social benefits*** through: • improving access to the countryside (by the delivery of new paths and accessible open spaces) • enhancing education (through the facilities provided in the Discovery Centre and increased access to the WWTP) • enhancing recreational opportunities (formalising recreational access and providing wider connectivity through new and enhanced public rights of way) The provision towards new recreational space and enhanced public rights of way, while necessary to mitigate the impact of the development, would also be available to everyone in the local area. These are social benefits of the scheme. ***Economic benefits*** through: • investment in construction and related employment for its duration • increasing operational employment • supporting planned population growth and urbanisation in Waterbeach (in water treatment terms) • increasing operational resilience and flexibility to accommodate population growth projections plus an allowance for climate change into the 2080s in accordance with Anglian Water's statutory duties and with capability to efficiently and economically expand within the WWTP site to accommodate anticipated flows into the early 2100s in support of the spatial development strategy for homes and jobs set out in the emerging GCLP and the ambitions set out in the recent announcement by the Prime Minister and the Secretary of State for Levelling Up, Housing and Communities on 24 July 2023 to 'supercharge' Cambridge as Europe's science capital. The most significant benefit is that decommissioning and release of the existing WWTP site will enable regeneration and the creation of a new district delivering 8,350 homes (40% affordable), 15,000 new jobs and a wide range of community, cultural and open space facilities (including a community garden and food growing spaces, indoor and outdoor sports facilities). Enabling the realisation of these benefits is the key purpose of the Application. Given the substantial need for the Proposed Development and public benefits that would arise, the Applicant considers that a clear and convincing justification for the Proposed Development has been demonstrated.
13.13	Applicant	**CEMP** ES Chapter 13 para 2.9.10 [AS-030] suggests that the CEMP and associated management plans would be approved by the Employer and would remain 'live' documents. Please clarify how this approach	The Applicant has added a new paragraph (4) to Requirement 9 to reflect that any reviews to the measures to be undertaken under the CEMPs and associated management plans must be undertaken in accordance with Requirement 6, which governs the amendments to approved details. The new

ExQ1	Question to	Question	Response
		aligns with R9 (Construction environmental management plan) of the dDCO which indicates just a single document would be submitted for approval with no requirement to review it.	paragraph is outlined below for ease of reference and is included in the Applicant's updated draft DCO (App Doc Ref 2.1) submitted at Deadline 1. *(4) The construction environmental management plan for each phase is to be kept under review and amended if necessary as construction proceeds and any amendments to the measures detailed in the approved construction environmental management plan and associated management plans must be undertaken in accordance with requirement 6 (approved details and amendments to them).*
13.14	Applicant	**Land restoration** ES Chapter 13 [AS-030] sets out that land would be reinstated where necessary after construction. Whilst measures for land reinstatement are identified in the CoCP and oSMP, should land reinstatement / restoration also be a specific requirement in the dDCO?	The Applicant does not believe that reinstatement/restoration requires a specific requirement within the draft DCO as measures are adequately secured already through Requirement 9 of the draft DCO (App Doc Ref 2.1) [AS-139] which requires compliance with the relevant CEMPs and the Outline Soil Management Plan (App Doc Ref 5.4.6.3) [**AS-060**]. Each CEMP includes a section on land quality, which will include all finalized measures relating to reinstatement and/restoration not captured in the Outline Soil Management Plan.
13.15	Applicant	**Effects** SCDC's RR [RR-004] suggests an under-reporting of effects on: Biggin Abbey GII* listed building during construction, given the period over which construction works would occur; and on Biggin Abbey GII* listed building, Poplar Hall GII listed building, Horningsea Conservation Area, Fen Ditton Conservation Area and Baits Bite Lock Conservation Area during operation. Please further justify your assessment of effects in light of SCDC's comments.	The Applicant is comfortable with the level of the reported effects on the designated assets. The Applicant refers to sections 2.15 and 3 of the ES Chapter 2: Project Description (App Doc Ref 5.2.2) [**APP-034**], which gives a description of the worst-case scenario for the construction of the Proposed Development. The construction programme will be phased, with works on the construction of the outfall, FE and storm pipeline (located within the conservation area and closest to Biggin Abbey) only taking place over 12 months and the construction of Waterbeach pipeline (which will be constructed as a tunnel close to Poplar Hall) 12 to 14 months (for its whole length) of the overall four year construction programme. In addition, construction mitigation measures, managed through the CoCP, will be used to minimise the temporary construction effects on the designated heritage assets.
13.16	Applicant	**Parameters** The ES Chapter 13 Table 2-6 [AS-030] states that the Terminal Pumping Station would be *40m below ground level*. Is this consistent with the parameters set out in Schedule 14 of the dDCO and if not, does this have any implications for the historic environment assessment (e.g. archaeology)?	The Applicant confirms that the correct parameters are given in Schedule 14 of the draft DCO (App Doc Ref 2.1) [**AS-139**], which confirm the Terminal Pumping Station would be 35m below ground level. As ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) [**AS-030**] states this would be 40m below ground level, this does not affect the assessment. The Applicant has assumed that all archaeological remains within the proposed WWTP will be removed by the Proposed Development. The identified archaeological remains within the WWTP footprint are located within the first few meters below the ground of surface. The implementation of the Archaeological Investigation Mitigation Strategy will be used to investigate and record the archaeological remains within the WWTP area.
13.17	Historic England, CCC, SCDC, CCoC	**Archaeology** Are the parties satisfied with the level of detail in the outline Archaeological Investigation Mitigation Strategy (AIMS) [AS-088] and CoCP Part A [APP-068] to inform the AIMS secured under R13 of the dDCO [AS-139]?	
13.18	Applicant	**Figures** The annotation of HE002 and HE003 on Figure 13.9 [AS-047] does not appear to correlate with the reference numbers of these heritage assets listed in para 3.1.11 of ES Chapter 6 [AS-030]? Please clarify / rectify.	The Applicant has updated the figures in the ES Book of Figures Historic Environment (App Doc Ref 5.3.13) provided at Deadline 1.

14. Landscape and visual

ExQ1	Question to	Question	Response
14.1	CCC SCDC CCoC	**Assessment** Please confirm whether you are satisfied with: a) the study area; and	

ExQ1	Question to	Question	Response
		b) the viewpoint (VP) / photomontage locations selected, as identified within ES Chapter 15: Landscape and Visual Amenity [AS-034]. If not, please explain the reasons for this.	
14.2	CCC, SCDC, CCoC	**Assessment** Please confirm whether you are satisfied with: a) the Applicant's Landscape and Visual Impact Assessment (LVIA) methodology; and b) its assessment of effects in respect of landscape and visual receptors. If not, please explain the reasons for this.	
14.3	Applicant	**Guidance** SCDC's RR [RR-004] makes reference to the Landscape Institute's Technical Guidance Note 2/19 on Residential Visual Amenity. Has consideration been given to this document in the assessment and if not, please explain the reason for this.	The requirement for a Residential Visual Amenity Assessment (RVAA) was not included in ES Appendix 4.1: Scoping Opinion (App Doc Ref 5.4.4.1) [**APP-079**]. The Scoping Opinion states that an LVIA is to be included in accordance with the Guidelines for Landscape and Visual Assessment – Third. Edition (2013) (GLVIA3). GLVIA3 was used to develop the proposed methodology for the study. Page 20 of ES Appendix 4.1 Scoping Opinion (App Doc Ref 5.4.4.1) [**APP-079**] states that: 'The EIA scoping report makes reference to published landscape assessments and includes a full methodology for the landscape and visual impact assessment (LVIA) and we are in agreement with the methodology proposed for this assessment'. The Scoping Opinion (App Doc Ref 5.4.4.1) [**APP-079**] states that the EIA should also include a Green Belt Assessment and Lighting Impact Assessment, but makes no mention of the requirement to carry out a RVAA. The scope of the study follows the methodology set out in the ES Appendix 4.2 Scoping Report (App Doc Ref 5.4.4.2) [**APP-080**]. As clarification, landscape and visual impact assessment (LVIA) and residential visual amenity assessment (RVAA) follow a related but different methodology. The Landscape Institute's Technical Guidance Note 2/19 on Residential Visual Amenity (2019) describes an RVAA as: 'a stage beyond LVIA' and explains the difference between the two: 'With respect to visual impact, the focus of GLVIA3 and LVIA is on public views and public visual amenity. RVAA focuses exclusively on private views and private visual amenity '. The LVIA evaluates effects on public views and public visual amenity. Paragraph 6.17 of GLVIA3 sets out: 'In some instances it may also be appropriate to consider private viewpoints, mainly from residential properties. In these cases, the scope of such an assessment should be agreed with the competent authority, as must the approach to identifying representative viewpoints since it is impractical to visit all properties that might be affected.' The representative viewpoints were discussed and agreed in consultation in a Technical Working Group on 7 December 2021 with Greater Cambridge Shared Planning Service, Historic England, the National Trust and Cambridge Past Present and Future and at a meeting with Greater Cambridge Shared Planning Service on 13 December 2021. No request for residential visual amenity assessment was noted during the consultations. ES Chapter 15: Landscape and Visual Amenity (App Doc Ref 5.2.15) [**AS-034**] assessed the effects on views of residential receptors, but, in line with the LVIA methodology, the baseline survey was carried out from publicly accessible land rather than private residential properties or private gardens. In ES Chapter 15 Landscape and Visual Amenity (App Doc Ref 5.2.15) [**AS-034**], visual receptors were grouped where effects on their views would be similar but in instances where only one property would be affected, the effect on the view from that property was assessed individually.
14.4	Applicant	**Wicken Fen Vision** NT's RR [RR-031] suggests that there are opportunities to enhance the Wicken Fen Vision area beyond that of the Order limits. To what extent has this been considered by the Applicant and is this something that the Applicant would be willing to explore with NT further?	The Applicant has responded to the National Trusts Relevant Representation [RR-031] comments regarding opportunities to enhance the Wicken Fen Vision within Table 3-20 of the Applicants Response to Relevant Representation (Doc 8.2). In summary, beyond the contributions provided within the Order Limits, the Applicant believes further contributions would be either outside the scope of the project or would not be justifiable in terms of compulsory acquisition of land.
14.5	Applicant	**Photographs** The photograph from VP8 [AS-099] was not taken due to site development works. Does the Applicant intend to revisit VP8 at any point in the Examination to take the photograph? If not, please provide justification.	A photograph to illustrate the view from Viewpoint 8 (representative of views of residents in the Marleigh development) in ES Appendix 15.2 Summer & Winter Views (App Doc Ref 5.4.15.2) [**AS-099**] was not taken during the assessment, because the Marleigh Development was under construction at the time and the viewpoint location was inside the construction site. A photograph will be taken when construction work on the Marleigh Development in this location if construction is completed and access to the viewpoint location is available during the Examination Period, however, at this point in time it is uncertain if this will occur.

ExQ1	Question to	Question	Response
14.6	Applicant	**Landscape planting** Some RRs (e.g. SCDC's [RR-004]) raise concerns around difficulties of plant / trees establishment on a made bank / bund and thus their effective longer term screening potential. Please clarify what specific measures would be required to ensure the establishment and survival of such planting and where this is secured.	Measures set out in ES Appendix 6.3 Outline Soil Management Plan (App Doc Ref 5.4.6.3) [**AS-060**] will be taken to preserve soil quality and create good growing conditions on the earth banks. The soil is being stripped from arable farmland and would be subject to requirements specified in ES Appendix 6.3 Outline Soil Management Plan (App Doc Ref 5.4.6.3) [**AS-060**], as well as requirements for monitoring reinstated soils so that they will function to the required level and to identify and rectify deficiencies. Furthermore, ES Appendix 6.1: Agricultural Land Classification details the soil type and nutrient levels across the Proposed Development. Therefore, planting can be matched to the surveyed soil types. ES Appendix 6.3 Outline Soil Management Plan (App Doc Ref 5.4.6.3) [**AS-060**] indicates that soils should be stockpiled according to soil type. Requirement 9 of the draft DCO (App Doc Ref 2.1) [**AS-139**] requires the preparation of detailed plans including a soil management plan which must accord with the measures set out in ES Appendix 6.3 Outline Soil Management Plan (App Doc Ref 5.4.6.3) [**AS-060**]. The specification of topsoil and subsoil depths on the earth banks, which would affect the establishment and growth of the planting, has not yet been detailed. Requirement 7 (Detailed Design) and Requirement 11 (LERMP) within the draft DCO (App Doc Ref 2.1) [**AS-139**] require details to be submitted to and approved by the relevant planning authority. Collectively these would include further detail on the design of the earth banks and specifications in relation to planting. ES Appendix 8.14: Landscape, Ecological and Recreational Management Plan (LERMP) (App Doc Ref 5.4.8.14) [**AS-066**] describes the maintenance of the planting on the earth banks surrounding the Proposed WWTP to aid establishment and growth. This includes weed control, irrigation and pruning. The trees and hedgerows on the earth bank will be watered during periods of drought for the first five growing seasons after planting. Trees will be planted in early winter to aid maximum root establishment and 'Gator' watering bags will be used to water heavy standard to semi-mature trees. Species selected to grow on the earth banks are found already growing in the area and tolerate the drier growing conditions found in East Anglia. ES Appendix 8.14: Landscape, Ecological and Recreational Management Plan (LERMP) (App Doc Ref 5.4.8.14) [**AS-066**] is secured by Requirement 11 in the draft DCO (App Doc Ref 2.1) [**AS-139**].
14.7	Applicant	**Effects** ES Chapter 15 [AS-034] reports no cumulative effects on landscape and visual receptors. However, please clarify whether, where for example, moderate adverse effects during construction have been reported separately for the proposed WWTP element and the proposed Waterbeach pipeline element (e.g. VPs 11, 22 and 25), this could result in an overall effect of greater than moderate.	The potential effects for the Waterbeach pipeline and the WWTP were reported separately as both elements of the Proposed Development could be delivered in different timescales or for the pipeline, through construction of different sections to accommodate other developments (paragraph 3.1.5 of ES Chapter 2: Project Description (App Doc Ref 5.2.2) [**APP-034**]). The Applicant acknowledges that the following text should have been included after paragraph 4.2.8 on page 67 of ES Chapter 15: Landscape and Visual Amenity (App Doc Ref 5.2.15) [**AS-034**] to clarify this: "The visual effects during construction of the Proposed WWTP, associated tunnel and outfall as assessed in Table 4-2 are considered to also represent a worst case construction scenario whereby construction of these elements happens at the same time as the Waterbeach pipeline. This is because the Waterbeach pipeline will occupy a relatively narrow corridor of land and will be seen in the context of the larger scale construction of the Proposed WWTP. The visual effects during construction of the Waterbeach pipeline as assessed in Table 4-4 assume that the construction phase of the Waterbeach pipeline does not overlap with construction of the other elements. If construction of the Proposed WWTP, associated tunnel and outfall does overlap with the Waterbeach pipeline, then the visual effects as assessed for VPs 11, 22 and 25 in Table 4-2 would apply." This addition of this text has been acknowledged in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1.

ExQ1	Question to	Question	Response
14.8	Applicant	**Future works** How can the Applicant be certain that any future expansion of the capacity of the proposed WWTP could be accommodated within the proposed WWTP and bunded area, noting concerns raised by some IPs relating to this (e.g. [RR-151])?	Due to the modular nature of the Proposed WWTP, future expansion could be delivered within the footprint of the Earth Bank left by the construction areas required to deliver the Proposed WWTP. Water treatment technology is a constantly improving area across the globe with technologies reducing in size, becoming more energy and carbon efficient all the time. The Applicant estimates, even with today's technologies the Proposed WWTP can double its flow and load capacity by utilising areas within the Earth Bank that are needed for the construction of the Proposed Development in line with the dDCO. Project Description section 2.15.3 The proposed WWTP also includes sufficient space to accommodate expansion beyond the 2041 horizon for housing and population growth covered by the emerging Greater Cambridge Local Plan period. This growth would be planned, consented and funded through the usual regulated business processes of Anglian Water Services Limited Please also refer to the Applicant's response to ExQ1 1.4.
14.9	Applicant	**Mitigation** ES Chapter 15 para 2.9.11 [AS-034] directs to Table 2-7 for primary and tertiary mitigation. However, Table 2-7, titled 'Primary and tertiary mitigation […]', identifies no tertiary mitigation. Please explain the reasons for this and amend Table 2-7 as necessary. In addition, there is a blank para 2.9.10 – please rectify as necessary.	As set out in in paragraph 2.9.5 in ES Chapter 15: Landscape and Visual Amenity (App Doc Ref 5.2.15) [**AS-034**], "Tertiary measures comprise good practice measures (such as measures within Considerate Contractors Scheme) and measures integrated into legal requirements secured through environmental permits and consents (least flexible as either the legislation exists to create the mitigation or does not (i.e. Protected Species Licensing)." As such, there are no tertiary mitigation measures that apply specifically to landscape design, since it is considered to be primary mitigation (embedded into design). Tertiary mitigation was mentioned in the table heading to be consistent with the rest of the ES. The Applicant acknowledges that there should not be a blank paragraph at 2.9.10. This error has been acknowledged in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1.
14.10	Applicant	**Error** ES Chapter 15 para 2.9.10 [AS-034] appears to have text missing. Please clarify / rectify.	This is a formatting error. Paragraph 2.9.10 should include the text currently shown in paragraph 2.9.11. There should be no paragraph 2.9.11. This error has been acknowledged in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1.
14.11	Applicant	**Trees** ES Figure 8.3 [AS-050] indicates that two veteran trees may be affected by the Proposed Development (Waterbeach pipeline element). NPSWW para 4.5.13 addresses the considerations relating to impacts on veteran trees. However, these are not mentioned in NPSWW Accordance Table [ASS-130] at the relevant section. In addition, it is unclear from the Arboricultural Impact Assessment (AIA) [APP-104] to what extent these trees may be affected. The ExA also notes the Woodland Trust's RR [RR-040] on the matter, including relevant standing advice on root protection areas for such trees. On this basis, please: a) Update the NPSWW Accordance Table as appropriate; b) Amend the AIA as necessary to identify impacts on veteran trees (as it appears to currently provide for a smaller root protection area than the standing advice for T105); and c) Provide or signpost to the associated tree protection plans referred to in the AIA (i.e. in para 8.1.1).	a) The NPSWW Accordance Table (App Doc Ref 7.5.1) has been updated in respect of paragraph 4.5.13 to note that the two veteran trees within the Order Limits will not be impacted by the Proposed Development as the pipeline trench avoids the trees. Details are set out in the response to ExQ1 5.51 and Figure 8.3 in the updated version of ES Book of Figures Biodiversity (App Doc Ref 5.3.8) [AS-050]. b) The Agricultural Impact Assessment for the Waterbeach pipeline (App Doc Ref 5.4.8.19) has been updated to reflect the root protection area provided in the standing advice. c) Tree Protection Plans have been provided as appendices to the Agricultural Impact Assessment for the Waterbeach pipeline (App Doc Ref 5.4.8.19) this includes an update to the root protection area for T105.
14.12	Applicant	**Requirements** R7(c) (as well as R11) of the dDCO relates to landscape planting. a) Should R7 also make reference to the LERMP given that this forms the basis of the landscape masterplan associated with the proposed WWTP; b) Does R7 (c) relate to all land within the Order limits; and c) Should R7(c) specify information to be provided, such as numbers, sizes and species, and should it require details of hard landscaping and landscape management also?	a) The Applicant does not consider this necessary as where a phase contains landscape planting, the Applicant will be required to submit details of this pursuant to R7 as well as submit a detailed LERMP, which must accord with the Landscape, Ecological and Recreational Management Plan (Application Document Reference: 5.4.8.14) [**AS-066**], which contains the landscape masterplan. b) This relates to any land within a phase of the authorised development and therefore includes all of the Order Limits. c) The Applicant does not consider this necessary. 'Landscaping planting' is a heading which directs the Applicant to the nature of the details to be submitted. The details submitted must be approved by the relevant planning authority therefore the onus is on the Applicant to ensure sufficient details are provided and it will be necessary for the relevant planning authority to be satisfied of such details before it approves the details. Landscape management is to be covered through the LERMP [**AS-066**]. Commitments to reinstate land after

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			construction are set out in the Code of Construction Practice Parts A & B (Appendix 2.1 & 2.2, App Doc Ref 5.4.2.1 & 5.4.2.2).
14.13	Applicant	**Landscape planting** ES Chapter 15 para 4.2.11 [AS-034] states that initial planting and reinstatement planting would occur during the construction phase and that this is set out in the CoCP Parts A and B. Please clarify where this is stated in these documents, noting that, for example, CoCP Part A para 7.2.68 [APP-068] states that reinstatement planting would be undertaken following construction?	The Applicant acknowledges that there is an incorrect cross reference and paragraph 4.2.11 of ES Chapter 15: Landscape and Visual Amenity (App Doc Ref 5.2.15 **[AS-034]** should state: "....will be carried out in accordance with CoCP Part A paragraph 7.2.68 (Appendix 2.1, App Doc Ref 5.4.2.1) [APP-068] and the CoCP Part B section 3.4 'Ecology and Nature Conservation' (Appendix 2.2, App Doc Ref 5.4.2.2) [**AS-161**], and the monitoring and management regimes as set out in the LERMP (Appendix 8.14, App Doc Ref 5.4.8.14)." This error has been acknowledged in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1.
14.14	Applicant	**Requirements** LERMP para 4.3.5 [AS-066] indicates that the relevant local planning authority and NE would be the approval bodies for discharging R11 of the dDCO. However, NE is not referred to in this requirement. Please clarify.	As confirmed at Issue Specific Hearing 1 and set out in response to ExQ1.10.17, the Applicant is content with the principle of the relevant planning authority consulting with Natural England and the Environment Agency and has made amendments to the Requirement to reflect this, however it has not been able to obtain the County Council's detailed views on this amendment.
14.15	Applicant	**Requirements** LERMP para 5.1.4 [AS-066] suggests that monitoring obligations are secured under a requirement of the dDCO and would be approved by the relevant local planning authority and NE. Where is this specified / secured in the dDCO?	Requirement 11 (LERMP) does not expressly refer to monitoring arrangements. However, the detailed LERMP, which must be submitted and approved by the relevant planning authority on a phase by phase basis, must accord with the details in the LERMP and therefore would be required to accord with the monitoring measures set out in section 5 of the LERMP.
14.16	Applicant	**Maintenance** In respect of LERMP Table 4.2 [AS-066] – a) For 'Proposed new areas of woodland', the 'At each maintenance visit' section says that timeframes and /or timings are not applicable. Please clarify, given that maintenance visits are likely to be needed to ensure establishment. b) It is stated that any trees which fail to establish in the first year will be replaced. Please justify this timeframe, given that assessments rely on effective woodland screening / establishment over a much longer period and that for 'Proposed new tree, shrub and hedgerow planting', it is indicated that any trees which fail within five years would be replaced (and noting that Table 5.1 indicates that any failures of woodland and trees, shrubs and hedgerows over a 30 year period would be replaced).	a) The frequency of maintenance visits is specified for particular activities for the habitat types specified within LERMP Table 4.2 [AS-066]. b)In Table 4.2 Proposed management post planting in the LERMP (App Doc Ref 5.4.8.14) [**AS-066**], it states (after the text in the LERMP quoted in the question) that every year: '*Failures: All trees, shrubs and hedgerow plants should be checked in September and those that failed to thrive to be marked with paint or marked on a plan. Replacements to be installed the next planting season, ie the following late winter to early spring. If a particular species fails to thrive, a replacement species may be considered, under advice of the landscape architect.'* This appears to contradict the text quoted in the question but gives an undertaking to replace failed planting in any year post planting, which is the basis of the assessment, rather than the first two years. The measures outlined in the LERMP including a regular programme of landscape maintenance aim to encourage the establishment and continued growth of the planting and minimise plant failure and the assessment replies on this commitment.
14.17	Applicant	**Lighting** ES Chapter 15 Table 5-1 [AS-034] and Lighting Assessment Report Table 4-4 [AS-100] state that lighting would be excluded from the proposed WWTP access road. Please signpost to where this is specified in the Lighting Design Strategy [APP-072], and if it is not, should it be?	The access road is defined within Section 1.3 of ES Appendix 2.3 Lighting Design Strategy (App Doc Ref 5.4.2.5) [**APP-072**] as: *"a new vehicle access from Horningsea Road including for Heavy Goods Vehicles (HGV's) bringing sludge onto the site for treatment and other site traffic."* This WWTP access road is not highlighted as an area to be lit in Appendix A of ES Appendix 2.3 Lighting Design Strategy (App Doc Ref 5.4.2.5) [**APP-072**]. Paragraph 5.5.2 of ES Appendix 2.3 Lighting Design Strategy (App Doc Ref 5.4.2.5) [**APP-072**] also states: "Lighting of the proposed WWTP road network will only be applied around the roads beside the Gateway Building, HGV parking area and staff car park as illustrated by the blue dashed line around Areas 1 and 2 on the plan in Appendix A. Operations staff would travel around the site after dark guided by their vehicle headlights." The access road is not included in this statement and therefore the lighting of this area is omitted. Additionally, on page 37 of ES Appendix 2.3 Lighting Design Strategy (App Doc Ref 5.4.2.5) [**APP-072**] within Appendix A the following is stated: *"GENERAL – ROADS / OPEN SPACES*

ExQ1	Question to	Question	Response
			• *The roads in general would not be lit. Lighting will only be installed along roads beside the Gateway Building, HGV parking area and staff car park as illustrated by the blue dashed line around Areas 1 and 2 on the plan above.* • *As minor roads, the proposed WWTP road lighting would have 10 Lux level.* • *Operations staff would travel around site by Electric Vehicle (EV) or internal combustion engine (ICE) vehicles and thereby guide by headlights"* On page 16 of ES Appendix 2.3 Lighting Design Strategy (App Doc Ref 5.4.2.5) [APP-072] under Lighting Design Objective 4 – avoid or minimise night working, the following is stated: *"4.2.9 Pathway lighting within the proposed WWTP will only be provided to get employees from the roadside (their cars, van or truck) to the relevant building or task / general inspection area. Other areas will be unlit, such as the access road to the proposed WWTP."*
14.18	Applicant	**Wider landscaping** The LERMP para 1.1.9 [AS-066] notes that it focuses on the area around the proposed WWTP. Where is it specified / secured that landscape elements in the wider Order limits would be protected / reinstated / managed to ensure establishment (e.g. along the proposed Waterbeach pipeline corridor and around the proposed outfall area)?	As set out in Appendix 8.14: Landscape, Ecological and Recreational Management Plan (Doc 5.4.8.14) at 1.1.9 The geographical focus of the LERMP is on the immediate area around the Proposed Waste Water Treatment Plant (WWTP). The Landscape Masterplan contained in the LERMP does not include the areas of the tunnel or pipeline structures or the outfall to the River Cam. The landscape, recreational and biodiversity contexts of these elements of the Proposed Development, together with potential environmental effects and mitigation, are outlined in the Environmental Statement. Commitments to reinstate land after construction are set out in the Code of Construction Practice Parts A & B (Appendix 2.1 & 2.2, App Doc Ref 5.4.2.1 & 5.4.2.2). …
14.19	Applicant	**Assessment** Regarding the landscape and visual assessment / lighting assessment: a) Would the proposed WWTP boiler stack (or any other feature) emit a plume, and would the flare stack emit a flare? b) If so, have these factors been taken into account in the landscape and visual assessment, lighting assessment and photomontages? c) If not, please provide an assessment in this regard or justify why this had been omitted from the assessments, noting that some RRs make reference to this (e.g. [RR-212 and RR-072]).	a) Under normal operation, there would be no readily discernable plume from the WWTP boiler stack. The flare stack will be enclosed, and no flame will be visible unless viewed directly from above. b) As there would be no discernible plume under normal operation and the flame within the flare stack would only be visible from above, neither has been assessed or shown in ES Chapter 15 Landscape and Visual Amenity (App Doc Ref 5.2.15) [**AS-034**] or ES Appendix 15.1 Photomontages (App Doc Ref 5.4.15.1) [**APP-127**]. The flare and flare stack were described in the ES Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [**AS-100**], however, as no flame would be visible, it was considered that they would have no impact on obtrusive light. c) The Applicant considers that neither the plume nor the flame within the flare stack would be visible under normal circumstances, they would therefore would not affect landscape, visual amenity or obtrusive light. The Applicant therefore considers that no updates to the assessments are required in this regard for the reasons set out in this response.
14.20	Applicant	**Lighting** [RR-061] raises a concern that no information appears to be provided in either the Lighting Design Strategy [APP-072] or the Lighting Assessment Report [AS-100] for the proposed workshop building. Please comment on this concern.	Table 4-1 in ES Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [**AS-100**] details lighting for the workshop building entry points as follows: 1. Visitors car park at Proposed WWTP - Other lighting requirements: 20 Lux at office/workshop building entry points, mounted on building at 5m above ground level, controlled via PIR sensor with manual override. 2. Staff car park at Proposed WWTP - Other lighting requirements: 20 Lux at office/workshop building entry points, mounted on building at 5m above ground level, controlled via PIR sensor with manual override. Operations staff would travel around the site after dark guided by their vehicle headlights. ES Appendix 2.3 Lighting Design Strategy (App Doc Ref 5.4.2.5) [**APP-072**] will be updated to include details of the workshop building and will be submitted at Deadline 2.

ExQ1	Question to	Question	Response
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14.21	Applicant	**Effects** ES Chapter 15 Table 4-6 [AS-034] reports moderate adverse (significant) effects at Year 15 from VP17 due to views being less open as a result of hedgerow and woodland planting (as illustrated on Photomontage 6 [APP-127]). Has consideration been given to less dense planting to allow glimpsed views through, and if so, might this reduce adverse visual effects from this viewpoint (and along Low Fen Drove Way in general)?	The Landscape Masterplan in the LERMP (App Doc Ref 5.4.8.14) [**AS-066**] shows a hedgerow with standard trees along the southern side of Low Fen Drove Way and blocks of woodland planting south of the hedgerow. This will change the view looking south from an existing view over an arable field to one that is wooded. The purpose of the planting is to screen the Proposed WWTP from Horningsea Road and provided new habitats for wildlife. Views north from Low Fen Drove Way will remain unchanged. The Landscape Masterplan was altered in response to comments during consultation with Greater Cambridge Shared Planning (4th May 2022) about the approach to woodland planting surrounding the Proposed WWTP. The planning authority had concerns that a large, continuous belt of woodland was uncharacteristic of the Fens National Character Area or Eastern Fen Edge Chalklands Landscape Character Area. As a result, the Landscape Masterplan was modified to reduce the scale of woodland planting, breaking it up into separate blocks, with linear gaps and open glades to allow views into the meadows surrounding the earth banks. The arrangement of the woodland blocks was carefully considered to allow views into the site but maintain the screening of the Proposed WWTP from the surrounding landscape. Horningsea Parish Council commented in their consultation response (27th April 2022) that more planting was required than shown on the Landscape Masterplan at the time of consultation to reduce the visual impacts of the industrial structures of the Proposed WWTP. The Landscape Masterplan aims to create a balance between screening the Proposed WWTP from view and maintaining some open views south, across the landscape. If the woodland planting around the Proposed WWTP were less dense, the Proposed WWTP would remain clearly visible from VP17 (along Low Fen Drove Way), VP25 (along Horningsea Road) and VP26 (from the ProW west of the Proposed WWTP) in year 15 of operation, rather than largely or fully screened. As a result, effects in year 15 would potentially remain the same as in year 1 rather than reducing as they will with the arrangement of woodland shown on the Landscape Masterplan. The location of the photomontage shows the view of a woodland block rather than along a gap between blocks where the view would be more open. The view from Low Fen Drove Way will change along the track, depending on whether the view is looking towards a woodland block or through a gap in the woodland towards the meadows surrounding the earth banks.

15. Land quality

ExQ1	Question to	Question	Response
15.1	Applicant	**Assessment** The EA [RR-013] considers that there is insufficient preliminary assessment and analysis of contamination in order to demonstrate that there would be no detrimental impact on groundwater. Regarding the Preliminary Risk Assessment [AS-089], please provide clarification why the conceptual site model and preliminary qualitative risk assessment (PRA) make no reference to the Waterbeach Water Recycling Centre (WRC). Please clarify why the ENVIROCHECK report covers only part of the area within the Order Limits.	The principles of the Land Condition Risk Management Framework guidance, published by the Environment Agency in 2023, have been followed. ES Appendix 14.1 Preliminary Risk Assessment (App Doc Ref 5.4.14.1) [**APP-122**] was submitted with the DCO application and soil, groundwater and surface water samples were retrieved and analysed for a wide range of potential contaminants. Specific concerns on test suites are answered in response to question 15.4 below. In respect of the omission of the Waterbeach Water Recycling Centre (WRC), the Applicant has since provided the additional information in the updated ES Appendix 14.1 Preliminary Risk Assessment (App Doc Ref 5.4.14.1) [**AS-089**]. Waterbeach Recycling Centre is added as a potential contamination source in section 5.3.5. Additional submissions have been made in response to the Environment Agency's Relevant Representation [**RR-013**] in respect of legibility of contamination summaries and provision of factual report data from all ground investigations across the Proposed Development. The Applicant confirms that these are contained in the following documents and welcomes additional comments from the Environment Agency. • ES Appendix 14.3 Geoenvironmental Results – proposed WWTP (App Doc Ref 5.4.14.3) [**AS-092**]

ExQ1	Question to	Question	Response
			• ES Appendix 14.4 Geoenvironmental Results – Waterbeach (App Doc Ref 5.4.14.4) [**AS-093**] • ES Appendix 14.6 Groundwater Investigation Report Waterbeach (App Doc Ref 5.4.14.6) [**AS-095**] • ES Appendix 14.7 Ground Investigation Report for Cambridge Waste Water Treatment Plant (App Doc Ref 5.4.14.7) [**AS-136a** and **AS-136b**] • ES Appendix 14.8 Ground Investigation Report for Cambridge WWTP – Phase B (App Doc Ref 5.4.14.8) [**AS-096**] • ES Appendix 14.9 Preliminary Ground Investigation Factual Report Cambridge WWTP (App Doc Ref 5.4.14.9) [**AS-097**] The Envirocheck report originally provided in ES Appendix 14.1 Preliminary Risk Assessment (App Doc Ref 5.4.14.1) [**APP-122**] is for the existing Cambridge WWTP. Envirocheck reports were procured and reviewed for the remainder of the Proposed Development, but not appended to ES Appendix 14.1 Preliminary Risk Assessment (App Doc Ref 5.4.14.1) [**APP-122**]. The Applicant has corrected page errors and include omitted Envirocheck reports in ES Appendix 14.1 Preliminary Risk Assessment (App Doc Ref 5.4.14.1) provided at Deadline 1. The Waterbeach WRC was assessed in the preliminary risk assessment but not investigated as part of the site investigation as there are no below ground works at the Waterbeach WRC associated with the Proposed Development. Therefore, no additional risk to receptors (human health or groundwater) are anticipated with the use of the site for construction purposes. Risks to construction personnel would be controlled through the Construction Design and Management Regulations (CDM) 2015. This site is also managed under an existing Environmental Permit issued by the Environment Agency. Should any changes to the site occur outside of the scope of the Proposed Development then this will be managed through engagement with the Environment Agency in accordance with the Environmental Permitting (England and Wales) Regulations.
15.2	EA	**Consents, permits and licences** Do you have any reason to believe that any operational pollution control permits or licences, or other relevant consents would not subsequently be approved if the dDCO were granted?	
15.3	EA	**NPSWW** Do you consider that the Proposed Development meets with the requirements of policy 3.7.8 of NPSWW which states that: *• the relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework; and* *• the effects of existing sources of pollution in and around the site are not such that the cumulative effects of pollution when the proposed development is added would make that development unacceptable, particularly in relation to statutory environmental quality limits.*	
15.4	Applicant	**Assessment** The EA [RR-013] notes that regarding the Geoenvironmental Results Waterbeach [AS-093] there has been no testing for ammonium or pesticides even though these were identified as potential contaminants within the Preliminary Risk Assessment, and no testing was targeted to the Waterbeach Water Recycling Centre. It also notes a lack of testing of groundwater for this part of the scheme. The EA also state that regarding the Geoenvironmental Results proposed WWTP [AS-091] there was no testing for Methyl tert-Butyl Ether or pesticides even those were identified as potential contaminants within the Preliminary Risk Assessment. The EA does not regard these matters as acceptable – please justify your approach.	Ammonia was not tested as total concentrations in soils, but ammoniacal nitrogen has been tested in groundwater and soil leachate samples; see Table 3-7, Table 3-8, Table 3-9 and Table 3-10 in ES Chapter 14: Land Quality (App Doc Ref 5.2.14) [**AS-032**]. These provide an indicator of the severity of such contamination. Importantly, the current testing for ammoniacal nitrogen provides information on risks to controlled waters, which is the principal pollutant linkage for ammonia. These data will inform the detailed materials management plans (MMP). Section 7.9.16 of the CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**] places a requirement on the contractor to prepare detailed plans prior to construction and these plans include the detailed MMP. The Applicant acknowledges that pesticides may be associated with agricultural land and can be found in low concentrations in groundwater through infiltration of rainwater through shallow soils. In this area, which comprises agricultural land (rather than manufacture or storage of pesticides), it is more likely to occur as widespread diffuse very low concentration pollution source. Pesticides will naturally break down in the environment and, where associated with diffuse sources, may be found in the Chalk in the 0.1ug/l

ExQ1	Question to	Question	Response
			to 1ug/l range. The Proposed Development would not be expected to alter the groundwater regime in the majority of the study area. Given the above, pesticides testing was discounted as a contaminant of concern in the site investigation. As per response to question 15.1, the Waterbeach WRC was assessed in the preliminary risk assessment but not investigated as part of the site investigation as there are no below ground works at the Waterbeach WRC associated with the Proposed Development. Therefore, no additional risk to receptors (human health or groundwater) are anticipated with the use of the site for construction purposes. Risks to construction personnel would be controlled through the Construction Design and Management Regulations (CDM) 2015. This site is also managed under an existing Environmental Permit issued by the Environment Agency. Should any changes to the site occur outside of the scope of the Proposed Development then this will be managed through engagement with the Environment Agency in accordance with the Environmental Permitting (England and Wales) Regulations. The Applicant acknowledges that methyl-tertiary butyl ether (MTBE) was identified as a potential contaminant of concern in ES Appendix 14.1 Preliminary Risk Assessment (App Doc Ref 5.4.14.1) [**AS-089**], but no MTBE testing of water has been undertaken to date. MTBE would be expected to be found in association with hydrocarbons (as an additive to petrol). MTBE (and hydrocarbon) sources on site are very low risk (i.e. a diffuse source from highways) rather than more significant sources such as fuel filling stations. No significantly elevated levels of petrol range hydrocarbons were recorded in groundwater analysed; see ES Appendix 14.3 Geoenvironmental Results – proposed WWTP (App Doc Ref 5.4.14.3) [**AS-091**]. Given the lack of petrol range hydrocarbons identified by analyses, it is considered that this can be used as an effective proxy for the absence of significant MTBE contamination. The Applicant is currently preparing an Outline Water Quality Monitoring Plan in discussion with the Environment Agency. Further assessment of groundwater quality will be undertaken during both the pre-construction and construction phase, which will include speciated petroleum hydrocarbons that will inform on the presence of petrol range hydrocarbons.
15.5	EA, CCoC, SCDC, CCC	**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?	
15.6	EA	**Licences, permits and decommissioning** Do you have any comments or concerns regarding the proposed details from the Applicant regarding: a) the surrendering of licences for the existing WWTP under the EA's RGN 9: Surrender Guidance, including the Sludge Treatment Centre (STC) Interim Industrial Effluent Discharge; b) The biological treatment works itself or existing Cambridge WWTP - Industrial Effluent Discharge; c) Monsal/Combined Heat and Power Plant Medium Combustion Permit; Do you have any other comments regarding the Outline Decommissioning Plan [AS-051] proposed by the Applicant?	
15.7	Applicant	**Assessment** Within the Outline Decommissioning Plan [AS-051], it is noted that various pieces of equipment would have holes drilled into them in order to allow rainwater to escape. Are there opportunities for contaminants to leak out of the plant equipment? Please direct the ExA to where this has been taken into consideration as part of the ES.	Sections 6.2.2, 6.5.2, 6.7.2, 6.8.2, 6.9.2, 6.11.2, 6.12.2, 6.18.2 and 6.19.2 of ES Appendix 2.3 Outline Decommissioning Plan (App Doc Ref 5.4.2.3) [**AS-051**] all refer to the various pieces of infrastructure that will be drained, de-sludged, flushed or cleaned as necessary prior to holes being drilled to prevent rainwater build-up. Rainwater would then only pass through cleaned redundant infrastructure reducing risks from mobilisation of residual contamination to the environment.
15.8	Applicant	**Monitoring**	The Applicant can confirm that it has reached agreement with the Environment Agency regarding proposals for groundwater quality monitoring during the operational phase of the Proposed

ExQ1	Question to	Question	Response
		The EA suggests [RR-013] that on a precautionary basis it would like to see operational phase groundwater quality monitoring for the wider scheme so that any unacceptable impacts to can be detected and appropriate mitigation measures implemented. The EA appears to be particularly concerned about potential leakages from infrastructure that would be used for underground or sub-water table transmission of pollutants. Please continue further discussion with the EA on this matter and provide an update on this to the ExA.	Development. These proposals will form the Operational Water Quality Monitoring Plan secured through Requirement 22 of the dDCO (Doc 2.1) [**AS-139**]. As set out in question 21.64, an Outline Water Quality Monitoring Plan has been prepared and agreed in principle with the Environment Agency. A draft of this document will be submitted at Deadline 1 and the final version once formally agreed with the Environment Agency will be updated for Deadline 2.
15.9	EA	**Review of Appendix 20.8** Have you reviewed Appendix 20.8: Update to Contaminant Transport Model [APP-158] digital ConSim models for the contaminant transport modelling assessment? Do you have any additional comments?	
15.10	CCoC, CCC, SCDC	**Mineral Safeguarding Areas** Do you consider that the Mineral Safeguarding Areas are adequately protected and do you consider the Applicant's conclusions within ES Chapter 14 [AS-032] regarding mineral safeguarding are acceptable and meet with local and national policy requirements?	
15.11	Applicant	**Mitigation** ES Chapter 14 [AS-032] states that it is proposed to reuse as much as possible of any of the extracted minerals within the Proposed Development. Please identify where this is secured.	Section 7.9 of ES Appendix 2.1 Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [**APP-068**] sets out the management of waste or minerals extracted on site and that the project maximises resource efficiency throughout the construction process, in line with the principles of the waste hierarchy and to project people and the environment. This is secured by Requirement 9(1) of the draft DCO (App Doc Ref 2.1) [**AS-139**], which requires submission and approval by the relevant planning authority of a construction environmental management plan. Requirement 9(2) of the draft DCO (App Doc Ref 2.1) [**AS-139**] confirms that any construction environmental management plan submitted must incorporate the measures specified in the code of construction practice.
15.12	Applicant	**Contamination land regime** Please provide more information regarding the contaminated land regime which the Applicant proposes would control any existing contamination risks during construction within ES Chapter 14 [AS-032].	Sections 5.7, 7.4 and 7.5 of ES Appendix 2.1 Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [**APP-068**] provides information on the controls during construction of the Proposed Development that include measures that control potential land contamination. Section 7.8 of ES Appendix 2.1 Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [**APP-068**] also contains measures to control dust, which includes soils generated dusts. This is secured by Requirement 9(1) of the draft DCO (App Doc Ref 2.1) [**AS-139**], which requires submission and approval by the relevant planning authority of a construction environmental management plan. Requirement 9(2) of the draft DCO (App Doc Ref 2.1) [**AS-139**] confirms that any construction environmental management plan submitted must incorporate the measures specified in the code of construction practice.
15.13	CCoC, CCC, SCDC, EA	**Review of additional information provided by the Applicant in response to ExA's Procedural Decision** Please provide comments on the updated information contained within ES Chapter 14 [AS-032] and the associated new and updated appendices [AS-089 to AS-098] in relation to the impacts on land quality received on 29th September 2023 from the Applicant.	
15.14	Applicant	**Disposal of waste** How would disposal of waste materials from decommissioning be controlled from a contamination perspective?	Section 7.3 of ES Appendix 2.3 Outline Decommissioning Plan (App Doc Ref 5.4.2.3) [**AS-051**] sets out the methodology for assessing land contamination. This will provide information on soil quality that can be used to support waste classification at decommissioning stage. Section 7.9 of the ES Appendix 2.1, Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [**APP-068**] sets out the measures to manage waste during the construction process including decommissioning of the existing Cambridge WWTP. The commitments in the CoCP are secured by Requirement 9(1) of the draft DCO (App Doc Ref 2.1) [**AS-139**], which requires submission and approval by the relevant planning authority of a construction environmental management plan. Requirement 9(2) of the draft DCO (App Doc Ref 2.1) [**AS-139**]

ExQ1	Question to	Question	Response
			confirms that any construction environmental management plan submitted must incorporate the measures specified in the CoCP.

16. Major accidents and disasters

ExQ1	Question to	Question	Response
16.1	Applicant	**Clarification – CEMP** Para 4.2.37 of ES Chapter 21 [AS-042] states that *Section 7.5 of the CoCP Part A, Water resources and flood risk, sets out a framework for the control of flood risk during construction, identifying a number of 'standard' mitigation measures which will be implemented whilst construction work takes place. These will be reflected in an appended plan to/as part of the CEMP.* Which of the documents listed under dDCO R9 [AS-139] would set out this information?	The draft Construction Environmental Management Plan (CEMP) (Doc 5.4.2.7)[AS-057] sets out the framework for each phases detailed CEMP, as part of these CEMPs there will be sections that set out standard and site-specific mitigation measures relating to water resources and flood risk, emergency preparedness and pollution incident control. Construction activities which are "on, or within 8 metres of, a main river" will be carried out in accordance with the relevant Flood Risk Activity Permit granted by the Environment Agency (see Consents and Other Permits Register (App Doc Ref 7.1).
16.2	Applicant	**Clarification – transportation of hazardous loads** Page 32 of ES chapter 21 [AS-042] notes that the assessment of the impact of the Proposed Development in relation to traffic accidents would be addressed in the ES Chapter 'Traffic and transport'. Please clarify where the risk of accidents associated with the transportation of potentially hazardous loads (including waste and flammable substances such as liquified natural gas) has been set out, along with where details of mitigation can be found.	The Applicant refers to ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) [**AS-038**], which indicates that there are no significant major traffic accident impacts identified in relation to the delivery of hazardous loads during construction, operation or decommissioning (for the purpose of permit surrender). All associated effects have been determined to be neutral and therefore are not significant. The impact of hazardous loads is discussed further in Section 4.2 and 4.3 of ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) [AS-038]. The Applicant also refers to Table 1-3 of the ES Chapter 21: Major Accidents and Disasters (App Doc Ref 5.2.21) [**AS-042**], which states that: "No hazardous loads are currently expected in relation to the construction and decommissioning of the Proposed Development." Should hazardous loads be required this assessment will be revisited.
16.3	Applicant	**Clarification - Decommissioning** Para 2.7.33 of ES Chapter 21 [AS-042] states that *Decommissioning of the existing Cambridge WWTP would be subject to a Decommissioning Management Plan which is to be agreed with the Local Planning Authority. An outline Decommissioning Management Plan (Application document Reference 7.18) describes measure applied to this activity. Post grant of the DCO and prior to commencement of decommissioning a detailed plan will be prepared and agreed with the Local Planning Authority.* The application submission includes an 'Outline Decommissioning Plan' [AS-051] but not '*An outline Decommissioning Management Plan'* and the ExA has been unable to locate a document with a reference of 7.18*.* Please clarify.	The Applicant confirms that the reference in paragraph 2.7.33 of ES Chapter 21: Major Accidents and Disasters (App Doc Ref 5.2.21) [**AS-042**]. This will be corrected in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1 to refer to ES Appendix 2.3 Outline Decommissioning Plan (App Doc Ref 5.4.2.3) [**AS-051**].
16.4	Applicant	**Clarification – emergency response plans** Para 4.2.26 of ES Chapter 21 [AS-042] refers to Emergency Response Plans required by section 5.6 of the CoCP Part A and also refers to an Emergency Preparedness Plan(s). Please indicate where Emergency Response Plans are referred to in CoCP Part A [APP-068] and explain how the Emergency Response Plan would differ from the Emergency Preparedness Plan.	The Emergency Response Plan(s) reference in the ES Chapter 21 (App Doc Ref 5.2.21) [AS-042] is due to an inconsistency naming error, paragraph 4.2.26 should refer to Emergency Preparedness Plans in line with the reference in the CoCP Part A (App Doc Ref 5.4.2.1)[**APP-068**]. This will be corrected in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1. The Emergency Preparedness Plan(s) will detail the Applicants response to emergencies such as spills, pollution events, fires, accidents, and site evacuations. The Emergency Preparedness Plans are to be integrated into the CEMP at each phases as set out in the draft CEMP (Doc 5.4.2.7) [**AS-057**].
16.5	Applicant	**Consultation responses** Table 1-2 of ES Chapter 21 [AS-042] refers to pre-application consultation. a) Please provide copies of the responses of DEFRA, the HSE and the MoD.	• The applicant will provide the response dated 08.08.2022 received from HSE. The Applicant notified DEFRA during the pre-application period, given their involvement in the Section 35

ExQ1	Question to	Question	Response
		b) Have there been any changes to the proposals since those responses were issued that could change the conclusions of any of these parties?	process. DEFRA specifically responded regarding approaches to security such as SEMD on 04.07.2023. The Applicant will provide a copy of this response. The MoD provided a consultation response on 13.08.2021 which has been provided. • There have not been any changes to the proposals since receiving these responses that could change the conclusion of the discussed parties.
16.6	Applicant, CCC, SCDC, CCoC	**Planning policy** 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: […]* a) Are there any other policies that should be taken into account which are not listed in this chapter of the ES? b) Are there any emerging local policies that you consider to be potentially Important and Relevant? c) Are there any Neighbourhood Plan or Minerals and Waste Local Plan policies that you consider to be potentially Important and Relevant? d) Are the local authorities content that all relevant development plan policies have been referred to? If not, which additional or alternative policies should be included?	a) The Applicant confirms that they are not aware of further local policies relevant to ES Chapter 21: Major Accidents and Disasters (App Doc Ref 5.2.21) [**AS-042**] other than items indicated in parts b) and c) below. b) The Applicant confirms that they are not aware of other emerging local policies relevant to ES Chapter 21 Major Accidents and Disasters (App Doc Ref 5.2.21) [**AS-042**]. The document will be updated to note that policy sections of relevant chapters of the ES should be referred to in relation to emerging policies, i.e. reference to flood risk policies in ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**]. This will be corrected in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1 to refer to ES Appendix 2.3 Outline Decommissioning Plan (App Doc Ref 5.4.2.3) [**AS-051**]. c) The Applicant is not aware of any Neighbourhood Plan policies relevant to the assessment. The Applicant will update ES Chapter 21: Major Accidents and Disasters (App Doc Ref 5.2.21) [**AS-042**] to include reference to Policy 26, Aerodrome Safeguarding , of the Cambridgeshire and Peterborough Combined Authority Minerals and Waste Local Plan. d) Not for the Applicant to respond to.
16.7	Applicant	**Planning policy** Para 1.3.4 of ES Chapter 21 [AS-042] refers to Policy 19 of the Cambridge Local Plan 2018. Is this policy number correct?	The Applicant confirms that the reference in paragraph 1.3.4 of ES Chapter 21 Major Accidents and Disasters (App Doc Ref 5.2.21) [**AS-042**] should refer to 'Policy 37'. This error has been acknowledged in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1.
16.8	Applicant, DEFRA	**Planning policy** Para 3.12.3 of NPSWW states: *If CPNI and Defra are satisfied security issues have been adequately addressed in the project when the application is submitted, they will provide confirmation of this to the examining authority and they should then not need to give any further consideration to the details of the security measures in its examination.* Please provide an update on DEFRA's position.	Defra confirmed to the Applicant in an e mail dated 4 July 2023 the following: *"Defra and can confirm* • *No specific concerns/comments from a cyber perspective.* • *No issues from a CNI threshold perspective.* • *The teams believe you will know how to approach security set up based on SEMD, PSG and WUKSS documents and would ask you note that you take a security minded approach when sharing information about the project and ensure you know who you are sharing information with, know where it is being kept and associated retention times.* • *Given the project our team(s) also highlighted that this is an ideal opportunity to design security in from the onset which is a good thing to be able to do".* The NPSWW Accordance Table (App Doc Ref 7.5.1) has been updated in respect of paragraphs 3.12.3 to reflect the above and is being provided at Deadline 1.
16.9	CCoC, National Highways	**Construction phase – vehicle movements including Abnormal Indivisible Loads** 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.* 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?	Not for the Applicant.
16.10	Applicant	**Existing WWTP – post-decommissioning – *Please note that this question also relates to the Health chapter of the ES and RRs related to that chapter*** CCC's RR [RR-002] notes that the duration and process of decommissioning has not been explained and that this should be clearly set out to ensure that negative impacts have been appropriately	a) As stated in response to question 17.12, the Applicant will be responsible for the security and safety of the existing Cambridge WWTP after it is decommissioned and until it is handed over for redevelopment. All existing security measures (fencing, gates, security, CCTV) will remain in place. This will help to mitigate all anti-social behaviour, risks to the environment or other risks such as trespass, arson etc so as not to harm the safety and amenities of nearby occupiers or landowners.

ExQ1	Question to	Question	Response
		mitigated. It makes a similar point in relation to security measures and anti-social behaviour. CCoC's RR [RR-001] also seeks this information, noting that there are concerns that once the site is decommissioned there may be a considerable gap until the site is redeveloped. CCoC considers that the impacts on human health have not adequately been addressed. Once the existing WWTP has been decommissioned: a) how would this location be secured to prevent unauthorised access, occupation or deposit of waste (fly-tipping), or other anti-social behaviour? b) would there be any way by which contaminants could be added to the water network via the decommissioned site, whether by accident or deliberately? c) would any buildings or structures containing asbestos and where asbestos could be exposed by vandalism, an accident or deterioration, be left on the site? d) could structures such as settlement tanks fill with water (e.g. by rainfall) and pose a safety risk in the event of unauthorised access? Please explain for how long any such risks would last, how they would be mitigated and by whom.	b) The Applicant understands the reference to 'water network' to refer to the exiting surface water drainage network within the existing Cambridge WWTP and controlled waters. As there are no expected significant effects as a result of accidental leaks or spills, no residual risks to human health from water pollution are anticipated as a result of decommissioning of the existing Cambridge WWTP. As there will be no discernible change from the baseline position, a negligible magnitude of impact on human health (from water pollution) is predicted. Adverse health outcomes are likely from exposure or consumption of polluted water. Therefore, the sensitivity of recreational receptors, and private water supplies, to human health effects from changes to water quality as a result of decommissioning activities is considered to receptor be medium as the receptor is non-vulnerable, and has capacity and means to absorb changes. However, the ability for the receptor to absorb changes is limited. c) The Applicant will ensure that all buildings are locked and secured as far as reasonably practicable. Existing site security measures will remain in place and all asbestos registers will be passed to the developer. d) The Applicant will ensure all tanks will be drained, cleaned, a whole punctured into the bottom to prevent them filling with water (e.g by rainfall). Chapter 20 of the ES (App Doc Ref 5.2.20) [**AS-040**] para 4.3.3 states that 'the redundant cleaned tanks will be punctured to prevent rainfall accumulation. Any percolating rainwater from the redundant tanks is expected to have no additional impact on water resources'. Section 6 of the Appendix 2.3: Outline Decommissioning Plan (App Doc Ref 5. 4.2.3) [**AS-051**] includes the measures to prevent rainwater build up as well as assurance that all access will either be locked off or removed. Requirement 9 of the dDCO requires the preparation of a detailed decommissioning plan where the relevant phase includes decommissioning which must accord with the outline decommissioning plan. This would be submitted to and approved by the relevant local planning authority.
16.11	Applicant	**Operational Phase – Environmental Management Systems** Para 4.4.7 and 4.4.8 of ES Chapter 21 [AS-042] state that *The earth bank will be designed and constructed according to industry best practice earthworks standards. The earth bank would be designed to have effective drainage and would be subject to ongoing monitoring as part of the Landscape Ecology and Recreation Management Plan (LERMP) which would be applied for 30 years as a minimum as part of the biodiversity net gain (BNG) obligation (Application Doc Ref 5.4.8.14)* and *In the event that structural failure of the earth bank occurred the Applicant would implement operational management plans and procedures. The management plans and procedures will sit within the EMS required under the environmental permitting regime. Including enacting emergency response plans.* a) Where in the LERMP is monitoring of the structural integrity of the earth bank provided for? b) Why is integrity of the earth bank considered to be part of the BNG obligation? c) What obligation would there be on the Applicant to restore the earth bank in the event of its failure and how would such an obligation be secured and enforced? There is reference to an Environmental Management System (EMS) in relation to this and other mitigation measures. d) Please provide a list of all mitigation measures that would be included in the EMS. e) Who would approve the EMS? f) How could it be guaranteed that mitigation measures noted in the ES would be included in the EMS or that the EMS approval body would accept the inclusion of those matters in the EMS? g) How would the failure to comply with measures / undertakings in the EMS be enforced?	~~a)~~ The ongoing monitoring referenced within Paragraph 4.4.7 of ES Chapter 21: Major Accidents and Disasters (App Doc Ref 5.2.21) [**AS-042**] relates to the monitoring of the habitats that form the earth bank, but not the monitoring of the structural integrity of the earth bank. The Applicant will review the wording in paragraph 4.47 of Paragraph 4.4.7 of ES Chapter 21: Major Accidents and Disasters (App Doc Ref 5.2.21) [**AS-042**] to ensure that this is clear. Amendments will be included within the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1. The correction will be made to refer to the commitments in relation to monitoring of the structural integrity of the earth bank, which are captured in paragraph 2.8.31 of ES Chapter 2: Project Description (App Doc Ref 5.2.2.) (**APP-034**], which states that '*Periodic inspection and maintenance of structure conditions will be included within the Applicant's asset management plan for the Proposed Development throughout the operation phase. The asset management plan will include inspection and monitoring of key assets including structures, electrical equipment, boiler, gas to grid and CHP units, outfall, earthworks, pipework.*', and within Table 2-2 of the Asset Management Plan (App Doc Ref 5.4.9.1) [**AS-074**] which states '*The AMP will outline a periodic inspection of earthworks for signs of ground movement and inspections of the condition of all earthwork assets, with repairs or replacement as required'*. b) The Applicant acknowledges that the wording in paragraph 4.4.7 is misleading and therefore will be updated to clarify that the structural integrity of the earth bank would be inspected and maintained under the requirements within the Asset Management Plan (AMP) (App Doc Ref 5.4.9.1) [**AS-074**]. In relation to the BNG obligation the structural integrity of the earth bank is necessary as the surface planting on the earth bank forms part of the landscape masterplan, the LERMP (App Doc Ref 5.4.8.14) [**AS-066**] therefore provides some function in relation to the

ExQ1	Question to	Question	Response
			management of the earth bank such that it relates to the continued maintenance of habitats. As noted in the response above it is the habitats that are part of the earth bank (trees, hedgerows, grassland, etc.) that form the BNG obligation, however, successfully sustaining the habitats is reliant on a structurally sound earth bank. Amendments clarifying the linkages between monitoring activities related to different plans will be included within the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1. c) Table 2-2 of the Operational Asset Management Plan (App Doc Ref 5.4.9.1) [**AS-074**] includes the obligation to repair or replace the earth bank in the event of a failure. This will be secured and enforced through Requirement 18 of the draft DCO (App Doc Ref 2.1) [**AS-139**], which requires the authorised development to be operated in accordance with the approved Operational Asset Management Plan. Under this requirement, the asset management plan must be submitted to and approved by the relevant planning authority. d) Mitigation measures which will be/are already included in the EMS and secured through compliance with the Environmental Permits for the proposed WWTP can be found in the Mitigation Tracker (App Doc Ref 5.4.2.6)[**AS-055**]. e) Environmental Management Systems (EMS) are not something that goes through an approval process and the Applicant already has an Environmental Management System that is accredited by ISO14001 and covers the management of logistics, handling and recycling of sewage and sewage-derived products and by-products for all its existing operational sites. Compliance with the processes and procedures that form the EMS are regularly audited internally and externally by independent bodies in order to maintain its accreditation or compliance with legal requirements. Where a permits condition states that an operation or activity must be carried out in accordance with the EMS this is regulated and audited by the Environment Agency. f) All mitigation measures which the Applicant has identified as being incorporated into the EMS and secured through the Environmental Permit as already processes and procedures incorporated into the existing ISO accredited EMS or are measures which the Applicant will need to implement in order to comply with the Environmental Permit conditions for the site. The Applicant does not consider that there are matters covered by the EMS that do not relate to compliant operations, and therefore it is not considered that the regulator would reject measures incorporated into the EMS. g) The EMS is made up of procedures and processes which are both company wide and site specific to its operational sites and offices, failure to comply with the EMS where it is secured through conditions within a sites Environmental Permit would be a failure to comply with the conditions of the Environmental Permit. Compliance with Environmental Permits is regulated and enforced by the Environment Agency.
16.12	Applicant	**Operational phase – risk management** Para 4.4.47 of ES Chapter 21 [AS-042] states: *The risk of fire from flaring will is managed through designed in line with the Applicants DSEAR guidance.* Para 4.4.48 of ES Chapter 21 [AS-042] states: *To mitigation against an on-site incident, under the EMS and operation procedures development for the proposed WWTP, the operator will prepare and test emergency procedures for dealing with the consequences of a major accident. The management system is required to include the risk management measures specified in the HAZOP and DSEAR plans and cover planned maintenance (Environment Agency, 2022).* a) What are the HAZOP and DSEAR plans? Please provide a copy of these. b) Please provide a copy of the Applicant's 'DSEAR guidance'. How does this differ from the DSEAR plan? c) How would adherence to this guidance be secured / guaranteed?	a) The DSEAR plans are currently being prepared as they will be finalized through the detailed design process and will be able to be shared at this stage. A hazard and operability study (HAZOP) is a structured and systematic examination of a complex system, usually a process facility, in order to identify hazards to personnel, equipment or the environment, as well as operability problems that could affect operations efficiency. It is the foremost hazard identification tool in the domain of process safety. The intention of performing a HAZOP is to review the design to pick up design and engineering issues that may otherwise not have been found. The technique is based on breaking the overall complex design of the process into a number of simpler sections called nodes which are then individually reviewed. It is carried out by a suitably experienced multi-disciplinary team during a series of meetings. The HAZOP technique is qualitative and aims to stimulate the imagination of participants to identify potential hazards and operability problems. Structure and direction are given to the review

ExQ1	Question to	Question	Response
			process by applying standardized guideword prompts to the review of each node. A relevant IEC standard calls for team members to display 'intuition and good judgement' and for the meetings to be held in "an atmosphere of critical thinking in a frank and open atmosphere. The HAZOP technique was initially developed for systems involving the treatment of a fluid medium or other material flow in the process industries, where it is now a major element of process safety management. It was later expanded to the analysis of batch reactions and process plant operational procedures. Recently, it has been used in domains other than or only loosely related to the process industries, namely: software applications including programmable electronic systems; software and code development; systems involving the movement of people by transport modes such as road, rail, and air; assessing administrative procedures in different industries; assessing medical devices. b) DSEAR, the Dangerous Substances and Explosive Atmospheres Regulations, 2002, is the United Kingdom's implementation of the European Union-wide ATEX directive. The intention of the Regulations is to reduce the risk of a fatality or serious injury resulting from a "dangerous substance" igniting and potentially exploding. Examples of a "dangerous substance", as defined by DSEAR, include sawdust, ethanol vapours, and hydrogen gas. The regulation is enforceable by the HSE or local authorities. c) The applicant will be fully compliant with the CDM 2015 regulations. The proposed DSEAR plans and HAZOP's that inform them form part of the Applicants compliance to the CDM regulations as stated.
16.13	Applicant	**Operational phase – hazardous area classification** Para 4.4.44 of ES Chapter 21 [AS-042] relates to Hazardous Area Classification. a) Has Hazardous Area Classification been conducted to inform the layout of the proposed WWTP? b) Could activities taking place in the publicly-accessible space outside of the perimeter fence, such as the use of electrically-assisted bicycles and tobacco smoking, increase the risk of an incident?	a) The Applicant confirms that a Hazardous Area Classification assessment was completed and utilised to inform layout of the Proposed WWTP including spacing and configuration of assets, ATEX rated equipment requirements, access requirements and associated road layouts and areas on site to which access will be restricted. These layout considerations were not limited to DSEAR (Dangerous Substances and Explosive Atmospheres Regulations) but also included chemicals (Control of Substances Hazardous to Health), frequent vehicle movement areas (e.g. delivery and removal of sludge), lifting requirements, site security, etc. b) The Applicant understands the question to concern the risk of an explosion incident associated with a spark source (public activities e.g. electrically-assisted bicycle and tobacco smoking) achieving contact with an area in which an explosive gas atmosphere (source the Proposed WWTP) is present in the publicly accessible space outside the perimeter fence of the Proposed WWTP. Biogas and bio-methane are fugitive gasses and dissipates readily and speedily into air to safe levels, should at any point it escapes from the systems – all designed to meet British Standards and other requirements for safe gas management systems. These gasses dissipate upwards. We confirm that Anglian Water ensures to provide their operators inside the perimeter fence a safe environment to work in accordance with the Health and Safety at Work act. As such, the risk to all outside the perimeter fence because of activities inside the fence will be negligible (Cambridge dictionary meaning 'too slight or small in amount to be of importance'). Further confidence can be taken from the road and footpath outside the Existing WWTP that is used for electrically- assisted bicycles, tobacco smoking, street vendor cooking, etc. at present.
16.14	Applicant	**Operational phase – biogas holder safety**	

ExQ1	Question to	Question	Response
		Para 4.4.46 of ES Chapter 21 [AS-042] states that *The biogas holder is to be shielded from areas of frequent access of the general public by the earth bank. The gas holder is located over 300m from the A14 and approximately 800m from the nearest public dwelling.* a) Section A on Plan 4.9.2 of the Design Plans [APP-023] appears to indicate that the biogas holder would be significantly taller than the earth bund – please explain how the bund would shield receptors outside of the site. b) How far would the biogas holder be from the on-site office accommodation and Discovery Centre? c) Would the occupants / users of the on-site office accommodation and Discovery Centre be shielded in the event of an explosion? d) If an explosion was to occur, how would this affect the on-site office accommodation and Discovery Centre?	a. Whilst the gas bag retains its integrity there is no risk of an explosion since the bag is full of bio-gas from the digester and there is no significant amount of oxygen so any blast from the gas bag would only occur due to catastrophic failure of the gas bag. It would also require ignition of the released gas at the same time as the failure. The gas bag area is zoned inline with Anglian Water Standards and suitable ATEX certified equipment will be used in the vicinity of the gas bag to significantly reduce the chance of such a gas cloud ignition. The gas bag is also protected from lightning strikes by an external air termination system (an isolated Lightning protection System) in line with BS EN 62305. This means that the lightning conductors are physically remote from the gas bag to ensure that the gas bag is not damaged during a lightning strike which is the most probable cause of a catastrophic failure. If the worst case occurred only part of the gas bag inventory would actually explode since the gas mixture must be between 4 & 15% concentration in air to explode, which reduces the effect of such an explosion. B, The Gas Holder is approximately 170m from the Workshop and approximately 315m from the discovery building. C, There would be some damage to buildings within a 39 to 48m radius but this would be directed at glass windows. The occupants/users of the on-site office accommodation and Discovery Centre in the proposed Gateway Building that extends to approximately 10.5m above finished ground level (afgl) as shown on Drawing 4.10.2 Design Plans - Buildings (Doc 4.10)[APP 024] would be shielded in the event of an explosion of the gas holder by the following proposed structures as shown on Drawing 4.91 Design Plans – Site Layout Plan (Doc 4.9) [APP 023] : A, the proposed boiler building extending to a height of 8.5m afgl as stated in Table 2.19 of the Project Description (Doc 5.2.2) [APP 034]; and B, the proposed Workshop extending to a height of 10m afgl as stated in paragraph 2.13.7 of the Project Description (Doc 5.2.2) [APP 034]. D, An explosion of the gas holder would shake the on-site office accommodation and Discovery Centre but it would not damage them due to the distance between the Gateway Building and the gas ~~bag~~ holder. A Dangerous Substances and Explosives Atmospheres Regulations (DSEAR) assessment will be carried out during detailed design to assess the risks to occupants/users of the on-site office accommodation and Discovery Centre from an explosion of the gas holder and measures taken to ensure the risks are eliminated or reduced as far as reasonably practicable as set out in paragraph 1.4.5 of Chapter 21 Major Accidents and Disasters (Doc 5.2.21) [**AS 042**].
16.15	Applicant	**Operational phase – safety of the workforce and visitors** At para 2.7.20 of ES Chapter 21 [AS-042] it is stated that *...an emergency muster point will be positioned away from the offices that it is easily accessible and large enough for all of the workforce at that location to assemble and be accounted for....* a) Where would this be located – would the visitors' car park be too close to the office building to be a safe muster point? b) If the visitors' car park was used as a muster point, where would emergency vehicles park in the event of an emergency? c) Would the muster point be accessible to people with reduced mobility?	a) fire inspection and risk assessments will be prepared and carried out for all relevant areas and buildings during the design phase and Fire and Emergency Plan(s) will be prepared with the likely location of the muster point being at the Western edge of the visitors car park outside of the Earth Bank. b) This will be completed during the preparation of the Fire and Emergency Plan and the Emergency Services will be consulted through the technical working groups regarding emergency preparedness. This requirement will be secured by the CEMP [AS-057] 5.4.2.7 ES Chapter 2 Apendix 2.7 Construction Environmental Management Plan on its completion. The visitors car park will be large enough for emergency vehicles and site staff to occupy at the same time. In the event of an emergency, emergency services vehicles will be able to access the proposed WWTP through the main access as this access is large enough to allow emergency services through even if there is a hazard or emergency occurring in the Gateway building. The gateway building will have fire suppression systems in place to control and reduce the likelihood of the building itself being engulfed in flames.

ExQ1	Question to	Question	Response
			c) The applicant will ensure that the muster point will be accessible to people with reduced mobility. With the muster point being at ground level and being able to be accessed by firm flat surfaces from anywhere in the proposed development.
16.16	Applicant	**Operational phase – security and safety, access and evacuation** ES Chapter 21 [AS-042] para 4.4.58 states that *The Proposed Development is vulnerable to malicious attack resulting in damaging equipment within the site facilities.* Para 4.4.59 and 4.4.60 state that *Design measures include the earth bank as well as perimeter fencing, the use of surveillance equipment to monitor the facility, security-controlled access and egress points* and *Physical security design measures following NSPA guidance (NSPA, 2023) will be incorporated to ensuring the site is secure from unauthorized personnel.* The drawing on page 100 of the DAS [AS-168] shows the alignment of the proposed WWTP's *secure boundary* as a broken red line. The line is between the bunding and the proposed WWTP. Para 7.9.2 of the DAS [AS-168] states that *The Gateway Building provides the main arrival point for workers and visitors, located at the convergence of the primary access road, the pedestrian and cycle route, the earth bank and the plant works. It provides access to the controlled areas of the landscape, including onto the earth bank and into the secure works site, and provides passive surveillance of the whole works from the offices within.* Table 2-25 of ES Chapter 2 [APP-034] states that CCTV cameras would be inside the perimeter fence boundary. a) What is the approximate circumference of the secure boundary? b) The application drawings show one point of access to / egress from the proposed WWTP but the above text implies that there would be more than one access / egress (security-controlled access and egress points, the main arrival point). Please confirm whether other points of access / egress which are not shown on the application drawings are intended to be provided. If so, please also indicate whether paths or roads would be provided to access these. c) Could the location of the Fuel Storage Area near the site's only access / egress and office building (Plan 4.9.1 of the Design Plans [APP-023]) prejudice the safe evacuation of the site in the event of an incident involving the fuel storage, or increase the risk of harm to people in the Gateway Building? Would it be safer to locate fuel storage elsewhere on the site? d) Would it be safe or desirable for the solar panel arrays to be located outside of the secure boundary? Could there be a need to erect fencing to protect them from vandalism etc? If there is a need for fencing, please provide indicative details of its location and height. e) In the event that the main site entrance was blocked / could not be used (e.g. because it was the location of an incident), how would emergency services such as the fire brigade access the site? How would staff evacuate the site? f) If the fire brigade needed to tend to an emergency within the secure boundary from a location outside of the secure boundary, would fire hydrants be available outside of the boundary? g) How would emergency services and site security access areas around the outside of the secure boundary bearing in mind the size of the site and length of the boundary – would this be by motorised vehicle? If so, how would vehicles travel from the site access road, bearing in mind the absence of roads around the proposed WWTP secure boundary and the proposed topography (which includes drainage ditches, ridges and furrows etc.)? h) Bearing in mind the curved secure boundary fence, would CCTV cameras need to be pole-mounted outside of the secure boundary fence to enable good coverage? If so, how many would be needed, how high would the mounting poles be, and how visible would these be from outside of the site?	a) The circumference of the secure boundary is approximately 1570.1m b) The primary access to/egress from the WWTP for vehicles will be via the main access road and a separate entrance/exit point for pedestrians and cyclists is proposed just north of the main vehicle entrance as stated in Application Document 7.6 Design and Access Statement (DAS) [AS 168] para 7.14.4 and shown on page 115 at points 5 and 6 respectively. In addition there are 3 ventilation gaps in the earth bank as shown in the Application Document 7.6 DAS [AS 168] page 117 that will allow for emergency access to/egress from the WWTP connected via paths to Low Fen Drove Way and Horningsea Road as shown in the Application Document 7.6 DAS [AS 168] page 115. c) The applicant will review the location and fencing requirements during the detailed design process, along with completing a Fire Risk Assessment and a Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) Risk Assessment to assess the location and security requirements d) The design of the proposed WWTP is intended to both be functional and to reduce as much visual harm as possible. To align with 'good design' the solar panels have been hidden from external view inside of the Earth Bank. Functionally these panels could be outside of the Earth bank but this would be incongruent with the Applicants designs. The fencing for the solar panels will be approximately 2m high and link in with the visual screening on the top of the Earth Bank and back to the SEMD compliant security fencing for the proposed WWTP. e) In addition to the main entrance at the Gateway Building it is intended that there will be gates in the security fencing at the locations of the gaps in the earth bund to allow for emergency access to/egress from the WWTP. As part of detailed design a Fire Risk Assessment and review by local Fire Services will be carried out to assess the appropriate fire safety and evacuation procedures for the proposed WWTP. The Applicant will prepare an outline fencing design that includes the solar panel protection and emergency access points in the detailed design phase. f) This will be completed during the preparation of the Fire and Emergency Plan and the Emergency Services will be consulted through the technical working groups regarding emergency preparedness. This requirement will be secured by the CEMP [AS-057] 5.4.2.7 ES Chapter 2 Appendix 2.7 Construction Environmental Management Plan on its completion. g) A perimeter road around the WWTP just within the boundary fencing has been included to provide access to the various areas within the WWTP for operational and emergency vehicles as shown in Application Document 4.9 Design Plans [APP 023] at Drawing 4.9.1. Whilst the primary access to this perimeter road will be via the main site entrance, access will also be available for emergency and security purposes via the gaps in the earth bund. h) The proposed indicative height and position of CCTV cameras are stated in Application Document 5.2.2 Project Description [APP 034] at Table 2.25. The requirements for CCTV coverage outside the

ExQ1	Question to	Question	Response
			secure boundary fence will be reviewed during detailed design in conjunction with the Applicant's Code of Practice for the Use of Surveillance Equipment and the prevailing requirements of the Security and Emergency Measures Direction (SEMD).
16.17	East of England Ambulance Service NHS Trust (EEAST); Cambridgeshire Fire and Rescue Service	**Construction and operational phases – emergency service access** a) Please provide details of alternative route planning that has been undertaken for ambulances and fire tenders for situations where roads are closed (including for AILs) or experiencing heavy congestion that could prevent emergency vehicles from safely accessing the worksites. b) Has an area been identified for Helicopter Emergency Medical Services (HEMS) access at each of the worksites? c) Has the fire and emergency rescue service responded in relation to the layout of the development for rescue and fire-fighting purposes? If not, please provide a response d) Would congestion on Horningsea Road prevent or slow down responders' journeys to locations other than the site? If so, how could any such concerns be overcome?	
16.18	Applicant	**Electricity transmission towers** Taking account of the proposed landscaping, would maintenance vehicles be able to access all electricity transmission towers around the site?	Yes. The Design does not prohibit access to the electricity transmission towers, maintenance vehicles would be able to get to the towers. See [AS-066] LERMP page 12 where the landscape plan shows a clear corridor and access way to the electricity transmission towers. This clearing will allow for access to these towers in the same way as currently achieved.
16.19	Applicant, Cambridge City Airport	**Cambridge City Airport** Page 19 of ES Chapter 21 [AS-042] states that: *The Code of Construction Practice (CoCP) (App Doc Ref 5.4.2.1) requires that relevant permits and approvals in relation to cranes and tall plant are obtained from the operators of Cambridge Airport prior to the commencement of construction.* **To the Applicant:** a) Please indicate where in the CoCP Part A [APP-068] and in the Consents and Permits Register [AS-123] the requirement to obtain *relevant permits and approvals* is set out. b) CoCP Part A [APP-068] refers to a highest point of 10 metres at para 5.12.2 and a highest point of 15 metres at para 5.15.1. Please explain why there are two height thresholds. **To Cambridge City Airport:** c) Is the airport operator satisfied with the proposed arrangements included in the CoCP and in any relevant Requirements? If not, what should be changed / added?	a) The Applicant notes that reference to the need for a permit from Cambridge City Airport was omitted from the Code of Construction Practice Part A (App Doc Ref 5.4.2.1)[**APP-068**] and the Consents and Other Permits Register (App Doc Ref 7.1)[**AS-123**]. This omission has been corrected in the deadline 1 submissions. b) The correct height is the 10 metres referred to at 5.12.1 of Code of Construction Part A (App Doc Ref 5.4.2.1)[App-068], paragraph 5.15.1 has been amended as part of the Deadline 1 submission.
16.20	Applicant	**Cambridge City Airport** Para 4.4.28 of ES Chapter 21 [AS-042] states: *Further consultation with Cambridge Airport will be in relation to the detailed design and orientation of buildings and lighting.* How would this consultation be secured / guaranteed?	The Applicant will continue to engage with Cambridge Airport and add them to the membership of the Technical Working Group for Environmental Health which includes the Local Authorities and undertakes the review of the lighting strategies.
16.21	Applicant	**Cambridge City Airport – operational WHMP** Para 2.7.31 of ES Chapter 21 [AS-042] states: *The Environment Manager will be responsible for the preparation and implementation of the operation WHMP including appointing suitably qualified and experience staff or contractors to undertake operational monitoring of birdstrike risk.* How would this be secured and enforced?	The Applicant acknowledges that the DCO previously only dealt with the construction measures in respect of the wildlife hazard management plan and has now added a new requirement 24 to deal with the operational wildlife hazard management plan. This new requirement is included in the updated dDCO submitted at Deadline 1 (App Doc Ref 2.1).
16.22	Applicant	**dDCO** Schedule 2 Part 1 of the dDCO [AS-139] defines *decommissioning* as *the process for decommissioning the existing Cambridge WWTW as described in the outline decommissioning plan.* Does this definition need to include any other decommissioning works, for example Waterbeach Water Recycling Centre?	The decommissioning of the Waterbeach WRC is outside of the scope of this application and therefore is not included in this definition. As explained in the Project Description (App Doc Ref 5.2.2, APP-034]), and in the Applicant's recent Change Request [doc ref], the limit of the authorised development is the pipeline connection to the new pumping station to be dealt with by the Waterbeach New Town developer.

17. Material resources and waste

ExQ1	Question to	Question	Response
17.1	Applicant	**Policy – NPPF** Para 1.3.4 of ES Chapter 16 [APP-048] states: The National Planning Policy Framework (NPPF) (Ministry of Housing, Communites [sic] & Local Government, 2021) sets out policies for development and makes specific reference to Section 17: Sustainable use of minerals. This includes the use of secondary and recycled materials and mineral waste before considering extraction of primary materials. a) Does the Applicant agree that this policy relates to plan-making? b) If so, should the decision-maker pay regard to it? c) Are any other parts of the NPPF Important and Relevant, e.g. para 4 and 8?	a) The Applicant agrees that NPPF paragraph 210 relates to plan-making for local authorities. NPPF paragraph 212 relates to the determination of planning applications for other (non-mineral extraction) development proposals in Mineral Safeguarding Areas. b) Section 17 of the NPPF is referenced for context on the wider policy framework for England. The Applicant considers that the decision-maker should only pay regard to the advice at paragraph 212 given that the proposed transfer tunnel, treated effluent pipeline and Waterbeach transfer corridor are situated within a Minerals Safeguarding Area. The impact of this aspect of the Proposed Development is considered in ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [**APP-048**]. c) NPPF paragraph 4 states that the NPPF 'should be read in conjunction with the Government's […] planning policy for waste'. ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [**APP-048**] was prepared with consideration to the national planning policy for waste (2014). The general approach for the Proposed Development is to support growth for the area, provide accessible services and deliver the substantial benefits that would arise from it which is provided by the Applicant. These are set out in sections 2.1-2.2 and their adequacy considered under the 'very special circumstances' in section 6.2 of the Planning Statement (App Doc Ref 7.5) [**AS-166**]. This also includes minimising waste and pollution specifically referenced under the overarching environmental objective of achieving sustainable development at NPPF paragraph 8. Both objectives are important and relevant.
17.2	Applicant	**Policy – Minerals and Waste Local Plan 2021** Please explain the relevancy of the following policies, which are listed at para 1.3.14 of ES Chapter 16 [APP-048], to the assessment of material resources and waste: − Policy 3: Waste management needs; − Policy 4: Providing for waste management; − Policy 10: Waste management areas; − Policy 11: Water recycling areas; − Policy 14: Waste Management Needs Arising; − Policy 16: Consultation areas; − Policy 17: Design; and − Policy 19: Restoration and aftercare.	The Applicant provides the following explanations: • **Policy 3: Waste management needs:** The information held within Policy 3 on the area's need for waste management capacity is considered for the baseline and potential impact of the Proposed Development on the forecasted future need. • **Policy 4: Providing for waste management:** ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [**APP-048**] demonstrates the construction of the Proposed Development considers the waste hierarchy, prioritizing waste minimisation and recycling to contribute towards sustainable waste management- as required by the policy. • **Policy 10: Waste management areas:** The Proposed Development has been screened to establish whether it is within a designated Waste Management Area, a designated area within the Local Plan whereby by waste management facilities are prioritised. • **Policy 11: Water recycling areas:** The Proposed Development has been screened to establish whether the construction and operation of Proposed Development will not have a detrimental impact on Water Recycling Areas, which are signposted as areas suitable for Water Recycling Centres. • **Policy 14: Waste Management Needs Arising:** The policy is for the use of the Waste Management Guide Toolkit for the operation of non-waste developments (as stated paragraph 5.10 of the Mineral and Waste Local Plan 2021). As part of the assessment of operational waste impacts, that the proposed mitigation within ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [**APP-048**] is considered to be appropriate and a Waste Management Guide Toolkit is not required. • **Policy 16: Consultation areas:** The Order Limits have been screened to confirm whether the Proposed Development is within a Consultation Area, especially for the purposes of Mineral Allocation Areas, Mineral Development Areas and Waste Management Areas; and thus would have potential for reducing amenities' future mineral excavation and/or waste management capacity. • **Policy 17: Design:** The policy primarily relates to proposed waste developments, and therefore the principles for high-quality design (efficient use of land, durability, visual richness etc) has been considered for the Proposed Development. In ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [**APP-048**] the high quality design has been addressed in regard to suitable reuse of excavated material, selection of secondary aggregates and materials with recycled content.

<table>
<tr><th>ExQ1</th><th>Question to</th><th>Question</th><th>Response</th></tr>
<tr><td></td><td></td><td></td><td>• Policy 19: Restoration and aftercare: The policy has been considered to confirm that the Proposed Development does not require a restoration and aftercare scheme, as the Proposed Development is not proposed to be temporary. The Proposed Development, especially the Proposed WWTP, is required to be present to serve the wastewater needs long term.</td></tr>
<tr><td>17.3</td><td>The Applicant, CCoC</td><td>Policy – interpretation of policy in Minerals and Waste Local Plan 2021
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:
a) it incorporates proposals for the sustainable use of soils (whether that be off-site or as part of an agreed restoration scheme); 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.

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.

Best and Most Versatile (BMV) agricultural land is graded 1 to 3a. The other agricultural land grades are 3b, 4 and 5.
a) Is there a ‘need’ for the Proposed Development within the meaning of the term ‘need’ as used in the Minerals and Waste Local Plan? If so, please explain the ‘need’ and how the Proposed Development satisfies that ‘need’.
b) Whilst four grades of agricultural land are referred to as ‘BMV’, are there differences between the quality of land in grades 1, 2, 3 and 3a? If so, would it be preferable to prioritise the protection of higher-grade BMV land over lower-grade BMV land?
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.
d) To Applicant only: What percentage of sites F, H, K and L (shown on page 4 of [APP-076]) are Grade 1, Grade 2, Grade 3, and Grade 3a agricultural land? Please give a separate percentage for each grade</td><td>a) The need for WWTP relocation is best described as a need to deliver a vacated site in accordance with the terms of the HIF award and a strategic development need for the site to be redeveloped to deliver a new low-carbon city district making a key contribution to the development of Cambridge, supporting growth in the economy and making an important contribution to meeting government housing objectives (consistent with the objectives at sections 6 and 11 of the NPPF). The regional and national significance of this has been recognised in the SoS (DEFRA) s.35 direction (18 January 2021) and its importance elevated by the announcement by the Prime Minister and the Secretary of State for Levelling Up, Housing and Communities on 24 July 2023 to ‘supercharge’ Cambridge. This need is fully described at section 2.1 of the Planning Statement (App Doc Ref 7.5) [AS-166]. The benefits arising from the Proposed Development are fully described at section 2.2 of the Planning Statement (App Doc Ref 7.5) [AS-166]. The justification for the use of BMV is set out at paragraphs 4.8.6 - 4.8.18 of the Planning Statement (App Doc Ref 7.5) [AS-166].
b) There are three grades of agricultural land referred to as BMV: Grades 1, 2 and 3a, as outlined in ES Chapter 6: Agricultural Land and Soils (App Doc Ref 5.4.6.1) [AS-024] and ES Appendix 6.1 Baseline Agricultural Land Classification (App Doc Ref 5.4.6.1) [AS-058]. Grade 3a is a subgrade of Grade 3, which is divided into 3a (BMV) and 3b (non-BMV). The differences in the quality of the land are described in further detail in the Ministry of Agriculture, Fisheries and Food Agricultural Land Classification of England and Wales guidelines (MAFF, 1988), but in summary Grade 1 is excellent quality, Grade 2 is very good and Grade 3a is good. It would be preferable to prioritise the protection of higher grade BMV land. To this end, the Proposed Development has been designed such that Grade 1 land is only affected temporarily, not permanently. Permanent effects of the proposed WWTP are to 30ha Grade 2, 50ha Grade 3a and 20ha Grade 3b (non-BMV). Although Grade 2 and Grade 3a land are BMV, the prevalence of BMV land in the local area means that it is not possible to avoid BMV land altogether and the disturbance to Grades 1 and 2 has been minimised through good design that can reduce the amount of both land and/or BMV land by minimising construction widths in the land temporarily required for the construction of the Proposed Development.
c) Policy 24 of the Minerals and Waste Local Plan 2021 specifies that, in the context of BMV land, there should be an absence of suitable alternative sites using lower grade non-BMV land. Policy 24 does not specify that lower BMV grades should be preferred to higher BMV grades. However, the Proposed Development has been designed with a preference of lower grades of agricultural land, as indicated by the permanent acquisition of Grade 2 and Grade 3a land but not Grade 1 land (Figure 6.2 in ES Book of Figures Agricultural Land and Soils (App Doc Ref 5.3.6) [AS-049] and ES Appendix 6.1 Baseline Agricultural Land Classification (App Doc Ref 5.4.6.1) [AS-058].
d) Please see the table below for areas of each grade in hectares for each site, based on a combination of provisional ALC data and previous (post-1988) surveys.
<table>
<tr><th>Units: hectares (%)</th><th>F</th><th>H</th><th>K</th><th>L</th></tr>
<tr><td>1</td><td>14ha (6%)</td><td>-</td><td>-</td><td>-</td></tr>
<tr><td>2</td><td>59ha (27%)</td><td>23ha (14%)</td><td>11ha (28%)</td><td>127ha (99%)</td></tr>
<tr><td>3</td><td>39ha (18%)</td><td>143ha (86%)</td><td>38ha (72%)</td><td>1ha (1%)</td></tr>
<tr><td>4</td><td>-</td><td>-</td><td>-</td><td>-</td></tr>
<tr><td>5</td><td>-</td><td>-</td><td>-</td><td>-</td></tr>
<tr><td>Non-agricultural land</td><td>109ha (49%)</td><td>-</td><td>-</td><td>-</td></tr>
</table></td></tr>
</table>

ExQ1	Question to	Question	Response
17.4	Applicant	**Policy – NPPW** Para 1.3.6 of ES Chapter 16 [APP-048] discusses NPPW policies relating to non-waste development. Please explain why these are relevant to the decision on this application for a DCO.	The Proposed Development is a waste related development, however, the assessment for ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [**APP-048**] considered all best practice (regardless of development type) for reducing impacts from material use and waste generation. Therefore the NPPW policies were reviewed to identify measures that would be suitable for the Proposed Development, such as limiting impact to existing waste management facility capacities, and providing sufficient waste provisions during operation, with maximising reuse and recovery options and limiting off-site disposal.
17.5	CCC, SCDC, CCoC	**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. Are the relevant authorities content with this approach or do you require further detail at this stage? If further detail is required at this stage, please explain why you do not consider it appropriate to deal with such detail under R9 of the dDCO.	
17.6	Applicant	**Policy – emerging Local Plan** Para 1.3.17 of ES Chapter 16 [APP-048] refers to the emerging local plan, supporting documents and topic papers. In respect of 'Material resources and waste', please set out which of these policies or documents you consider to be Important and Relevant to the decision on this application.	The Applicant has completed a review and can clarify that none of the supporting documents and topic papers in the emerging local plan refer to material use and waste generation. Therefore, the applicable statement in paragraph 1.3.17 is not to be considered.
17.7	Applicant	**Policy – draft NECAAP** Para 1.3.17 of ES Chapter 16 [APP-048] refers to the draft NECAAP. Please explain whether, and which part(s) of, this document is / are Important and Relevant to the decision on this application.	Policy 2 of the draft NECAAP, relates to designing for a climate emergency, refers to the need for site waste to be managed to reduce construction waste. The policy also states that developments are to be designed to maximise resource efficiency, such as limiting the use of materials during construction and operational phases, and consider the use of sustainable materials. This policy has been considered for managing the waste generated from the Proposed Development in particular in relation to the reuse of excavated material from the construction of the transfer tunnel as stated in section 7.9 of the CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**].
17.8	CCC, SCDC, CCoC	**Policy – adopted and emerging Local Plan and SPDs** a) Do you agree that the policies listed in ES Chapter 16 are relevant to the determination of this application? b) If not, which policies should be disregarded? Have any policies been omitted which should be taken into account? If so, which?	
17.9	Applicant	**Environmental Statement – clarification** Para 4.2.6 of ES Chapter 16 [APP-048] states that *Estimated quantities of resource materials required for the construction of the Waterbeach Pipeline are provided in Table 3-1 in 'Materials resources and waste estimates' (Appendix 16.1, App Doc Ref 5.4.16.1). The raw materials required for the construction of the Waterbeach Pipeline are High Performance Polyethylene (HPPE) pipes and aggregates for road surfacing works. The HDPE pipes are considered a manufactured product and are not included in the assessment based on the assumption given in section 2.7.* a) would the pipes be HPPE or HDPE? b) If the pipes are considered to be a 'manufactured product', is it accurate to refer to them as a 'raw material'?	For both a) and b), the Applicant recognises that that paragraph 4.2.6 of ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [**APP-048**] should state: *Estimated quantities of resource materials required for the construction of the Waterbeach Pipeline are provided in Table 3-1 in 'Materials resources and waste estimates' (Appendix 16.1, App Doc Ref 5.4.16.1). 'The manufactured products and raw materials required for the construction of the Waterbeach Pipeline are High Performance Polyethylene (HPPE) pipes and aggregates for road surfacing works. The HPPE pipes are considered a manufactured product and are not included in the assessment based on the assumption given in section 2.7.'* This error has been acknowledged in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1.
17.10	Applicant	**Environmental Statement – clarification**	The Applicant recognises that ES Appendix 16.1 Material Resource Requirements and Waste Estimates (App Doc Ref 5.4.16.1) [**APP-132**] should state:

ExQ1	Question to	Question	Response
		In ES Appendix 16.1 Material Resource Requirements and Waste Estimates [APP-132], and save for the 0.5km covered within the area required for the construction of the proposed WWTP, why is the proposed WWTP referred to in Table 3-2 and Table 3-3 (which relate to the Waterbeach Pipeline)?	For paragraph 3.3.1: The estimated waste volumes from the construction of the Waterbeach Pipeline are detailed within Table 3-2. For Table 3-3, the table heading will be amended to state: 'Summary waste sources not yet quantifiable in relation to construction of the Waterbeach Pipeline.' This error has been acknowledged in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1.
17.11	Applicant	**Environmental Statement – clarification** Para 4.3.7 of ES Chapter 16 [APP-048] states that *Use of bio-fertiliser on agricultural land is the most sustainable option and is guided by The Sludge (Use* in Agriculture*) Regulation (The Sludge (Use in Agriculture) Regulation, 1998).* Should this reference be to The Sludge (Use in Agriculture) Regulations 1989?	The Applicant recognises that there has been a typo error in in relation to the date of the regulations identified in paragraph 4.3.7 of ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [**APP-048**]. The reference to "1998" (in paragraph 4.3.7) should be replaced by "1989". This error has been acknowledged in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1.
17.12	Applicant	**Environmental Statement – scope** Table 1-3 of ES Chapter 16 [APP-048] summarises some of the advice given to the Applicant during the pre-application stage thus: [Planning] *Inspectorate does not agree that the effects of waste generated from demolition activities at both existing sewage works can be scoped out of the assessment at this time. The assessment needs to describe the likely decommissioning works to the extent that they are foreseeable.* The ExA understands that such information has not been included because it is intended that post-decommissioning work at the existing WWTP would be undertaken by the party or parties who would be redeveloping that site as part of the wider prospective North East Cambridge (NEC) development. The status of the emerging local plan and the NECAAP (which are not yet adopted) and the absence of planning permission for NEC (including for demolition of the existing WWTP) would need to be taken into account when assessing the weight that can be given to the certainty of the existing WWTP being redeveloped, as well as the timing of redevelopment. a) Does the intention to leave structures etc. on the decommissioned sites (at both the existing WWTP and Waterbeach) accord with the EA's requirement to return the site of a regulated facility to a satisfactory state, having regard to the condition of the site before the permit was granted (para 4.4.5 of [APP-048])? What is the EA's requirement? b) How long does the Applicant expect the decommissioned structures to remain in situ pending redevelopment at both sites? c) Are there any risks associated with this – whether risks to the environment or other risks such as trespass, arson etc.? How would any such risks be minimised or mitigated so as not to harm the safety and amenities of nearby occupiers or landowners. d) What would happen if the NEC development or the redevelopment of the decommissioned existing WWTP does not proceed? e) Are any entities subject to legal obligations to clear the decommissioned site, whether or not in connection with the NEC development? Please provide evidence to support your response. f) If yes, what provisions are in place if those entities cease to exist or fail to clear the decommissioned site? Does the responsibility fall back to the Applicant? Please provide evidence to support your response. g) Please also explain the arrangements that are in place for the removal of structures at Waterbeach. h) Bearing in mind the Planning Inspectorate's advice, is the Applicant satisfied that its approach has sufficiently pre¬empted any challenge to the Secretary of State's decision in respect of the adequacy of the ES? Please provide a full explanation to support your answer.	a) The Environmental Permitting Regulations Form H5, Site Condition Report (SCR) guidance and templates provides guidance for the surrender of an environmental permit. Section 5 of the guidance document identifies that the SCR is to detail the condition of the land and groundwater at the point of the surrender of the environmental permit and the SCR is also to detail how pollution risks from site are mitigated. As stated in Section 4.4 of ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [**APP-048**], the Applicant will remove all contents inside tanks (and tanks to be clean), consumables materials, chemicals and waste from the existing CWWTP, and confirm the integrity of pollution control measures (e.g. hard standing and drainage) as part of the decommissioning plan to demonstrate all sources of pollution risks have been removed as required for the SCR. The intention is therefore to leave built structures on the decommissioned sites (at both the existing Cambridge WWTP and Waterbeach). The surrender of the environmental permit is not dependent on the demolition of the existing built structures on the decommissioned site. b) Decommissioned structures and land will be handed over to the developer once all structures are decommissioned and made safe so the time they are left in situ will be minimal. c) The Applicant will be responsible for the security and safety of the existing Cambridge WWTP after it is decommissioned and until it is handed over for redevelopment. All existing security measures (fencing, gates, security, CCTV) will remain in place. This will help to mitigate all anti-social behaviour, risks to the environment or other risks such as trespass, arson etc. so as not to harm the safety and amenities of nearby occupiers or landowners. d) The parties to the Master Development Agreement (MDA) are contractually committed to bringing forward the NEC development so will be doing so in accordance with the terms of that agreement. If the development of the existing WWTP is not delivered in accordance with the terms and milestones of the MDA, Cambridge 4 LLP (the JV between Anglian Water and Cambridge City Council) will be entitled to terminate the MDA, and take back control of the site. The obligation to deliver the planned housing at NEC will remain an obligation on Cambridge and the Applicant pursuant to the Grant Determination Agreement (GDA), so in such circumstances it is expected they would procure a new partner to fulfil the obligation to deliver the housing. Commercially, given the housing needs of the Cambridge area, the need to generate a receipt, and the grant funding already procured for the relocation, it is difficult to foresee a scenario where the proposed housing development at the existing Cambridge WWTP and the NEC is not brought forward in some form. e) The MDA requires U and I (Cambridge) Limited to, once the conditions are satisfied (which include the delivery of vacant possession of the existing Cambridge WWTP site and the City Council's land by the landowners once the relocation has taken place) to carry out the Plot Infrastructure Works, which includes such Remediation Works (as defined in the MDA – these include removing obstructions, carry out necessary service diversions, piling works, and the removal of any contamination) as required to enable the Proposed

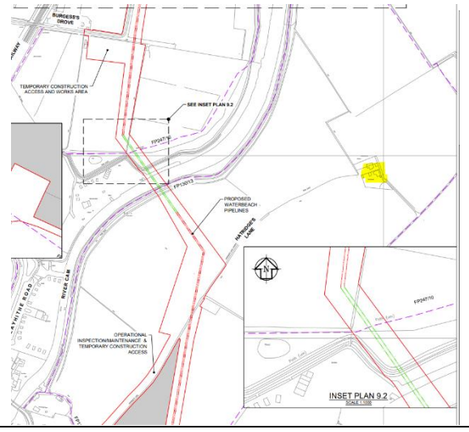
ExQ1	Question to	Question	Response
			Development (i.e. the Development of the Development Area (which includes the existing Cambridge WWTP). f) If U and I (Cambridge) Limited fail to deliver their obligations under the MDA, the project partners (the Applicant and Cambridge City Council) can terminate the MDA, and will then be able to re-procure a development partner to fulfil these obligations so the housing outputs can be delivered. g) The Applicant assumes this point refers to Waterbeach WRC. Waterbeach WRC is not within the scope of the DCO and future decommissioning and demolition would be completed by others. These activities would be subject to separate permissions. The decommissioning of the Waterbeach WRC in order to surrender the existing Environmental Permit for this site will be undertaken by the Applicant in accordance with regulatory requirements. The developer of Waterbeach New Town East would undertake the full decommissioning and demolition of the Waterbeach WRC. The dates and approach to full decommissioning are linked to the pumping station construction and installation of the new rising mains for which the timeframe is currently not finalised. The Applicant is aware that the developer for Waterbeach New Town East (The Waterbeach Development Company (WDC)) are in the process of submitting an EIA screening request to South Cambridgeshire District Council in relation to a pumping station planning application. No permission is currently granted and therefore there is limited amount of information available in relation to the precise timing and approach in relation to the removal of structures at Waterbeach WRC. h) The activities associated with the removal of structures at either the existing Cambridge WWTP or the Waterbeach WRC do not form part of the Proposed Development. They are the responsibility of other parties involved in the redevelopment of each site in the future. Consent is not sought for these activities under the draft DCO and therefore they are not included in its scope. The redevelopment works (including demolition and remediation) fall outside the scope of the DCO application and are being carried out by other parties under a future planning permission, they therefore clearly do not constitute part of the Proposed Development for the purposes of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The activities are assessed within ES Chapter 22: Cumulative Effects (App Doc Ref 5.2.22) [**AS-044**] as part of the cumulative effects assessment, drawing on the limited amount of information available for a Tier 3 project in accordance with PINS Advice Note 17.
17.13	CCC	**Environmental Statement – scope** Is CCC, as local authority for development at NEC, satisfied that it is appropriate to exclude demolition of the existing WWTP from this DCO application, bearing in mind that any impacts associated with the demolition could have to be taken into account in the determination of a planning application for NEC? What are the Council's views on the site potentially remaining uncleared or undeveloped for a number of years?	
17.14	SCDC	**Environmental Statement – scope** Is SCDC, as local authority for Waterbeach, satisfied that it is appropriate to exclude demolition of the existing Waterbeach facility from this DCO application? What are your views on the site potentially remaining uncleared or undeveloped for a number of years?	
17.15	Applicant	**Proposed WWTP – use of excavated material** CCoC's RR [RR-001] states at 10.1 that *The Council notes that a quantity of material will be excavated from the ground to construct the proposed Transfer Tunnel and that this will be used in landscaping around the proposed Water Recycling Centre. During the Examination the Council will be seeking to ensure that only material from the development is used in the landscaping and that inert material*	The Applicant notes that paragraph 4.2.9 of ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [**APP-048**] states that 'based on the volume of material required for the proposed earth bank, as a worst-case scenario, there will be a deficit of 4,373 m^3 of material that will need to be imported, which is 1.65% of the estimated volume of fill material required for the proposed earth bank. It has been stated under Table 2-5 of ES Appendix 16.1 Material Resource Requirements and Waste Estimates (App Doc

ExQ1	Question to	Question	Response
		from other developments will not be required. If this were to occur it would change the policy context, and Policy 26 Other Developments Requiring Importation of Materials would be relevant. The Council wishes to ensure that the importation of inert material will not be required. Please explain whether and how CCoC's request can be addressed.	Ref 5.4.16.1) [**APP-132**] that: "The numbers provided indicate a minor shortfall in the volume required for the earth bank. As the intention is a 'cut fill balance' there would be minor adjustments in earthworks to achieve this intention, as a worst case however the import of material for this shortfall is considered in the assessment." The principles of design and construction of the Proposed Development are to achieve a cut fill balance so that the Proposed Development does not require importation of inert material. If the final design requires the import of small volume of inert material, then a consultation will be undertaken with CCoC to identify and agree the approach to mitigate potential effects from the importation of material. The Applicant refers to measures relating to the reuse of materials within the Proposed Development as set out within section 7.9 of the CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**],which requires the implementation of an approved Materials Management Plan.
17.16	Applicant	**Proposed WWTP – use of excavated material** At para 3.2.6 of ES Chapter 16 Appendix 16.1 [APP-132] it is stated that *As part of mitigation plans, re-use of all suitable excavated material in the construction of the Proposed Development has been proposed to reduce the requirement to import materials for construction and reducing the need to remove surplus materials (waste generated) from site. This would produce less carbon emission for the transportation of materials on-site and removal of waste for disposal.* At para 4.2.39 it is stated that Non-hazardous excavated soil will be reused on-site for landscaping works. Considering a worst-case scenario, where excavated material (except topsoil) is unacceptable for reuse, it will be managed in accordance with the waste hierarchy. The reduction in the Cambridgeshire's non-hazardous landfill void capacity, given in Table 3-9 and paragraph 3.1.25, would be by 0.4% in the event that the entire estimated 26,241m^3 of material did require disposal, the reduction in East of England's non-hazardous landfill void capacity will be 0.11%. a) Please explain why the 26,241m^3 of excavated material might be unacceptable for re-use. b) When would the suitability of this material for re-use be known? c) If it is acceptable for re-use, how would it be used? d) In the interests of minimising vehicle journeys and associated carbon emissions, if this material is suitable for re-use how could its re-use on-site or, failing that, on other local developments be ensured? e) If it were used in landscaping works, how would this affect the appearance of the Proposed Development? Would the scheme's parameters change?	a) The Applicant refers to a footnote under Table 2-7 of ES Appendix 16.1 Material Resource Requirements and Waste Estimates (App Doc Ref 5.4.16.1) [**APP-132**], which states that: 'disposal of excavated material other than topsoil, rock or artificial hard material refers to litter/rubbish, large rocks, redundant pipework, land drain debris etc.' At this stage of the design this material is identified as 'unacceptable' for reuse within the Proposed Development, due to its unknown composition or suitability for reuse. The Applicant refers to measures relating to the reuse of materials within the Proposed Development as set out within section 7.9 of the CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**],which requires the implementation of an approved Materials Management Plan that will provide the approach for use of materials like large rocks. Furthermore, the application of CL:AIRE Definition of Waste: Development Industry Code of Practice (CL:AIRE, 2011) would be applied for the reuse of excavated waste materials (if required). b) The Applicant confirms that the suitability for reuse of this material will be known when further Ground Investigation (GI) has been completed for the Proposed Development. Further GI will be completed post DCO consent. c) The Applicant states that if this excavated material is suitable for reuse, some material (large rocks, non plastic pipeworks etc) may be reused (after treatment, such as crushing on-site) to meet the minor shortfall of material required for construction of earth bank or landscaping works. d) The Applicant states that if this excavated material is acceptable for reuse then some of it (large rocks, non plastic pipeworks etc) may be reused for construction of the proposed earth bank as there is a minor shortfall off 4,373m^3 of material that will be required for its construction, thus not requiring the importation of material. Remaining unused material could be sent to other local developments for reuse or to waste treatment facilities for recovery. It has been stated in paragraph 3.1.33 of ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [**APP-048**] that currently there are 125 U1 waste exempt sites within 10km of the proposed WWTP could potentially accept waste from the Proposed Development. These exempt sites are often short-lived and therefore should be identified upon commencement of construction. Table 3-13 of ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [**APP-048**] provides a list of permitted waste management sites within 10km of the Proposed Development for construction and demolition waste recycling and recovery. Regarding the use of materials on other sites / local developments, where vehicle movements would be required to move materials to other sites / local developments, there is a requirement in section 3 of the CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**] to communicate this proactively with local stakeholders. Additionally, Section 7.6 of the CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**] outlines the traffic and transport measures that will be put in place to minimise impacts upon road users. The CTMP (App Doc Ref 5.4.19.7) [AS-109] includes measures to control traffic movements, which includes a restriction on construction vehicles travelling in the peak hour. Compliance with the CoCP is secured through Requirement 8 of the draft DCO (App Doc Ref 2.1) [AS-139] and Requirement 9 ensures that detailed CTMPs are provided and which must accord with the CTMP (App Doc Ref 5.4.19.7, [AS-109]). e) The Applicant states that if some of this excavated non-hazardous material is used in landscaping works, the appearance and parameters of the Proposed Development will not change as currently

ExQ1	Question to	Question	Response
			there is a minor shortfall of 4,373m^3 of material required for the construction of the earth bank, thus not requiring the importation of material. No, it is unlikely that the species choices would be affected, based on the existing soil types for the core part of the site. The Applicant has proposed a wide variety of species and these tolerate and/or thrive in different forms of soil, including in some cases, low fertility subsoil. The five Grassland zone types will vary in their preferences for levels of organic matter, fertility, stoniness and loam/clay/sand content, though the mixes have been selected partly by the findings of the Baseline Agricultural Land Classification (App Doc Ref 6.4.6.1)[**AS-058**], where the range of soil types share a common characteristic of being calcareous. The Applicants approach is dynamic: to use a wide range within a seed mix and plant community, and species that thrive in some areas will be less successful in others, allowing other species to successfully compete. Aspect, undulations in the topography, light availability and varying degrees of moisture will combine with soil variation to allow the full range of species to establish.
17.17	Applicant	**Proposed WWTP – operational phase effects** In section 4.3 of ES Chapter 16 [APP-048] under the heading 'Operation Phase Proposed WWTP' the following is noted: *4.3.14 The application of measures within section 7.9 of the CoCP Part A (Appendix 2.1, App Doc Ref 5.4.2.1) would further mitigate the potential effects associated with waste generation during construction.* Please explain the construction activities that would be taking place and the measures in CoCP Part A that would be applied during the operational phase.	The Applicant recognises that there has been a typo error in paragraph 4.3.14 of ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [**APP-048**]. The reference to "construction" (in paragraph 4.3.14) should be replaced by the word "operation". This error has been acknowledged in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1. It is noted that CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**] is specifically for the construction phase, however, some measures identified could also be applicable to the operational phase. As such ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [**APP-048**] should state: 'Some of the application of measures within section 7.9 of the CoCP Part A (Appendix 2.1, App Doc Ref 5.4.2.1) that relate to waste storage and segregation, waste minimisation are applicable for operational phase and would further mitigate the potential effects associated with waste generation during operation.' This error has been acknowledged in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1.
17.18	Applicant, CCC, SCDC	**Proposed WWTP – use of resources** It has been suggested in some RRs (such as [RR-167]) that there is no operational reason to replace the existing WWTP and that the plant / equipment is still fit for purpose. On the basis that there is no operational need to replace the existing WWTP, should the use of resources and the generation of waste (as explained in ES Chapter 16 [APP-048]) to build the proposed WWTP and associated works be given positive, neutral or negative weight in the planning balance?	Whilst the Applicant agrees that there is no operational reason to replace the existing WWTP, a very clear and strong justification for the use of resources and the generation of waste (as explained in ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [**APP-048**] to build the Proposed Development to deliver the substantial benefits that would arise from it is provided by the Applicant. These are set out in sections 2.1 - 2.2 and their adequacy considered under the 'very special circumstances' in section 6.2 of the Planning Statement (App Doc Ref 7.5)[AS-166].

18. Noise and vibration

ExQ1	Question to	Question	Response
18.1	Applicant	**Assessment** Do the impacts of operational traffic contained with ES Chapter 17 Noise and Vibration [AS-036] consider night time impacts?	The assessment of operational traffic noise is provided in section 4.2.4 to 4.2.12 of ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] and follows the Design Manual for Roads and Bridges (DMRB) LA 111 Noise and vibration assessment methodology; see section 2.2.25 of ES Chapter 17: Noise and Vibration (App Doc 5.2.17) [**AS-036**]. The methodology is based on noise level change by comparison of baseline noise level (BNL) values ($L_{A10,18hour}$). This method uses assessment of potential impacts during daytime periods to indicate likely impacts during night-time assuming typical distribution of traffic flow between day and night-time periods (i.e. night-time traffic using the existing road network and operational traffic movements are reduced compared to daytime traffic flows). Assessment of night-time noise impacts is therefore implied but not explicitly made using this method. The number of operational traffic movements is provided in sections 5.1.3 to 5.1.6 of ES Chapter 2: Project Description (App Doc Ref 5.2.2) [**APP-034**]. Comparison of noise level changes is provided in Table 4-25 of ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**]. The assessment assumes the total number of daily operational traffic movements are included within the 18hour daytime period (06:00 to 00:00) which represents a worst case outcome (i.e. some movements may also occur during night time periods at a reduced volume). The assessment determines a negligible noise impact during the daytime assessment period. Assuming typical distribution of traffic flow between day and night-time periods, the implied worst case night-time noise impact is also expected to be negligible. Moreover, it is understood that the number of operational traffic movements per hour during night-time periods would be lower compared to daytime when accounting for operational working hours as described in Section 5.1.7 of ES Chapter 2: Project Description (App Doc Ref 5.2.2) [**APP-034**]. Night-time operational traffic noise impacts would therefore be similar or lower than implied from assessment of daytime impacts. On this basis assessment of operational traffic included within ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**], completed in accordance with DMRB LA 111 methodology determines negligible noise impacts during daily periods (including during daytime and implied during night time periods). No further assessment is required.
18.2	Applicant	**Assessment** Please justify why Grange Farm, Clayhithe Road was not included as a sensitive receptor within ES Chapter 17 [AS-036] for which noise and vibration monitoring and modelling was undertaken, given it appears to be a residential property adjacent to a construction access?	Section 2.2.12 of ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] describes the methodology for assessment of construction noise impacts and approach for selection of representative receptors for assessment. Calculations and assessment of construction noise impacts have been completed at selected receptor locations representative of the most affected sensitive receptors during relevant construction activities. Nearby receptors are expected to result in noise impacts which are similar or less than selected representative receptors. Baseline noise measurements were undertaken at locations along Clayhithe Road and near Waterbeach. Measurement locations are representative of sensitive receptors in the surrounding area and not exclusive to specific receptors. Calculations were undertaken at representative receptors for the purpose of assessment and not all sensitive receptors. An assessment was undertaken at RC9 (Hollymeads, Clayhithe Road) which is closest representative receptor location to Grange Farm, Clayhithe Road. RC9 shares an equivalent baseline noise environment to Grange Farm due to its location and surrounding ambient noise sources. Both RC9 and Grange Farm are located near construction access routes and the Waterbeach Pipeline working areas. The number of construction traffic movements using these construction access routes is assumed to be the same as both serve the Waterbeach Pipeline work areas. RC9 is slightly closer to these construction noise sources so would be subject to greater noise impacts than Grange Farm. On this

ExQ1	Question to	Question	Response
		Please justify why the property highlighted below in yellow (taken from Sheet 9 of the General Arrangement Plans [AS-149]) was not included as a sensitive receptor within ES Chapter 17 [AS-036] for which noise and vibration monitoring and modelling was undertaken, given it appears to be a residential property in relatively close proximity to the Proposed Development: 	basis, the RC9 assessment location can be considered to represent worst case potential impacts at Grange Farm. In practice noise impacts at Grange Farm may be slightly less than those assessed at RC9. The highlighted receptor (Northfields Farm) was not included as a sensitive receptor in assessment as this location is outside of the construction noise and vibration study area as defined by the above methodology in Section 2.3.2 of ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**]. Selected representative receptors in this area within the study area are closer to proposed construction works and would be subject to greater noise impacts.
18.3	Applicant	**Assessment** Why were receptors around Cody Road / Abbey Place (Waterbeach) scoped out of assessment from noise and vibration impacts?	Section 2.3.2 of ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] sets out the construction noise study area which includes an area 300m from construction activities in accordance with BS5228:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites – Part 1: Noise' guidance. The nearest construction working areas to Cody Road and Abbey Place receptors are east of the existing Waterbeach WRC and includes the Waterbeach construction compound, which is more than 300m away from receptors. Section 2.3.3 of ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] sets out the construction vibration study area, which includes an area 100m from high vibratory sources of construction activities in accordance with BS5228:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites – Part 2: Vibration' guidance. Construction working areas that include high vibratory sources during construction works are more than 100m away from receptors located on Cody Road and Abbey Place. Receptors located on Cody Road and Abbey Place are therefore outside the study area and not included within assessment of construction noise and vibration impacts. Representative receptor locations have been selected for the purpose of assessment that are closer to the construction works on Capper Road (i.e. RC1 and RC2). These representative receptor locations are selected to represent the greatest impacts due to construction noise and vibration for sensitive receptors within this area. Receptors further from construction activities would result in lower noise and vibration impacts including those on Cody Road and Abbey Place.
18.4	Applicant	**Response to SCDC's RR** Please provide a response to para 76 and 77 of SCDC's RR [RR-004].	The Applicant notes the request and the reference. The Applicant is not here intending to disapply the need for a consent under section 61. The Applicant is just providing a defence. SCDC has a preference to disapply this provision and for the CEMP to provide the regulatory framework to operate. The Applicant will review this with SCDC and record the outcome in the Statement of Common Ground.
18.5	Applicant	**NPSWW** Para 4.9.8 of NPSWW states that the Proposed Development should demonstrate good design through selection of the quietest cost-effective plant available. Whilst it is noted that NPSWW accordance table [AS-130] states that the use of low noise generating plant and equipment has	Sections 4.3.10 to 4.3.15 of ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] show that noise impacts from operation of the Proposed Development would be low in accordance with BS4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound'. These impacts are assessed to be negligible and not significant.

ExQ1	Question to	Question	Response
		been selected, please confirm whether the equipment selected is the quietest cost-effective plant available? If not, please justify your response.	Assessment is based on plant and equipment noise information provided within ES Appendix 17.4: Operational Noise Sources (App Doc Ref 5.4.17.4) [**APP-136**]. Where available plant and equipment noise level information is based on suppliers' and manufacturers' information from plant specifications provided by the Applicant's design team. Where data was unavailable, reference was made to equivalent plant data from similar sites or to maximum noise level specification for plant items which have been provided as the worst case noise level plant will be permitted to generate once installed. Values have been selected to represent reasonable worst case noise emissions from plant for assessment of operational noise impacts from the Proposed Development. Selection of plant and equipment includes low noise types where possible for environmental and occupational noise requirements. Plant selections are, however, made to consider all relevant requirements. Additional requirements include: engineering design, safety, maintenance, etc. In accordance with paragraph 4.9.8 of NPSWW, good design is implemented through the selection of quietest cost-effective plant and equipment in addition to locating noise sources within buildings where possible, site location to maximise distance to sensitive receptors and layout of the Proposed Development within the earthwork embankment. Requirement 7(1) of the dDCO provides a regulatory mechanism as it requires details of layout and design of plant and buildings to be submitted for approval prior to the commencement of the phase in which such plant is to be provided. In discharging the requirement it is the Applicant's expectation that the relevant planning authority would ensure that the relevant plant accorded with the scope of the environmental impact assessment. On this basis of environmental effects being negligible and the enforcement of the DCO, selection of plant and equipment that are quieter at source would not be necessary as it would not reduce the magnitude of impact at receptor locations. The Applicant would consider the selection of quieter equipment where cost-effective in addition to meeting other requirements (i.e. safety, engineering design, etc). The NPSWW Accordance Table (App Doc Ref 7.5.1) has been updated in respect of paragraphs 4.9.8 to reflect the above and is being provided at Deadline 1.

ExQ1	Question to	Question	Response
18.6	Applicant	**Assessment** Residential properties have been categorised as having Medium Sensitivity - Moderate tolerance to change and of Moderate quality/importance within the Noise Assessment within ES Chapter 17 [AS-036]. CCC state that residential properties are usually considered highly sensitive noise receptors with a low tolerance to change, and that the noise assessment therefore is likely to underestimate the overall significance of effects. a) It is stated within ES Chapter 17 [AS-036] that the sensitivity of different receptors has been reviewed in accordance with prevailing standards and guidance accounting for criteria such as their ability to absorb change, their importance and value. Please provide further information on the aforementioned prevailing standards and guidance and justify why residential properties have been categorised as medium sensitivity, with reference to CCC's comments. b) Would residential properties have a lesser degree of tolerance at night and does this affect their classification of sensitivity – why / why not? c) Please justify why listed buildings are listed as having medium sensitivity and therefore moderate quality given the significance of these heritage assets and importance to be attributed to such buildings within national planning policy and NPSWW.	a) There is no nationally adopted approach or guidance which define the sensitivity of noise and vibration sensitive receptors. The sensitivity of different receptors has been reviewed using criteria described in Table 2-7 of ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] which considers factors such as their ability to absorb change, their importance and value. The receptor sensitivity and magnitude of impact scales are structured within the assessment methodology such that the assessment of likely significant effects aligns with methodology from relevant guidance and standards (i.e. BS 5228, BS 4142, DMRB LA 111). Residential receptors within the study area have been selected to have medium sensitivity. On this basis, considering the magnitude of impact scales and sensitivity of receptor, the assessment does not underestimate the overall significant of effects but aligns with relevant guidance and standards (i.e. BS 5228, BS 4142, DMRB LA 111). Sections 2.2.32 to 2.2.35 of ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] also describes how the above initial significance of noise and vibration effects, based on sensitivity and magnitude of impact, can be subject to additional factors. Where relevant, the use of expert judgement was applied to consider the sensitivity of specific receptors or specific parts/aspects of a receptor location to adjust the determination of final significance. b) In general, people are more sensitive to noise during night-time periods compared to daytime periods. The classification of sensitivity for receptors is, however, not changed for different times of day, but instead this tolerance is accounted for in selection of the Lowest Observable Adverse Effect Level (LOAEL) and the Significant Observable Adverse Effect Level (SOAEL) values. The tolerance to absorb change is included within assessment methodology through the selection of relevant LOAEL and SOAEL values for day and night-time periods. Night-time LOAEL and SOAEL values are lower compared to daytime values. c) Section 2.2.29 of ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] states receptors that may be affected by noise and vibration due to the Proposed Development include people and communities. The assessment of noise and vibration effects focusses on people as sensitive receptors including those in listed buildings or assets of historical interest. People are greatly more sensitive to changes in noise and vibration compared to buildings or structures. The level of vibration required to result in cosmetic damage to unreinforced, light-framed structures or residential buildings is significantly higher (i.e. 15mm/s PPV) compared to that which is likely to be intolerable for human receptors (i.e. 1.0mm/s PPV). All sensitive receptors including people in listed or historical buildings are therefore allocated to a medium sensitivity.
18.7	Applicant	**Guidance – BS 5228-1** Para 2.3.2 of ES Chapter 17 [AS-036] states that in accordance with BS 5228-1 guidance, the study area for airborne noise during the construction phase includes an area 300m from any construction works. Please signpost to where within the guidance (i.e. page and para number) this is stated.	Section F.2.2.2.2 (Page 132) of BS 5228-1 states that noise predictions at distances over 300m have to be treated with caution due to uncertainty. This includes uncertainty due to meteorological effects on prediction results at greater distances. It is noted that predicted noise levels and resulting impacts at distances greater than 300m would not result in significant adverse effects. On this basis, a 300m study area was selected for assessment of construction noise impacts.
18.8	Applicant	**Assessment** Para 2.3.3 of ES Chapter 17 [AS-036] states that *Groundborne vibration typically has the potential to affect the closest receptors during activities that involve high vibratory sources (for example piling, vibratory compaction or tunnelling). Vibration effects are assessed for receptors within 100m of these relevant activities. This distance is extended, however, for specific circumstances where significant adverse effects appear likely at larger distances*. Please detail how these parameters have been determined and if there is any guidance which supports this.	Section 2.3.3 of ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] states groundborne vibration has the potential to affect the closest receptors during activities that involve high vibratory sources (for example piling, vibratory compaction or tunnelling). Table E.1 (Page 72) of BS 5228-2 provides empirical methods for prediction of groundborne vibration from a range of construction activities. Most prediction methods are provided over distance ranges up to approximately 100m. Predictions at distances greater than 100m fall outside the validity of these empirical methods. Figures 4.1 and 4.2 of ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] show that vibration from typical construction and tunnelling activities at distances greater than 100m would not exceed SOAEL (1.0mm/s) or result in significant adverse effects. On this basis a 100m study area was selected for assessment of construction vibration impacts.
18.9	Applicant	**Assessment and mitigation** CCoC raise concerns [RR-001] that some assessments can't be adequately concluded as some of the fixed plant locations, such as the pumping station, have yet to be determined and confirmed. They suggest that further assessments would be needed to ensure there are no impacts on human health	It is understood that the comment in CCoC's Relevant Rep [**RR-001**] refers to the Waterbeach pumping station.

ExQ1	Question to	Question	Response
		from noise and vibration when the locations have been confirmed. Do you agree with CCoC and how do you propose to ensure that this matter is satisfactorily addressed?	Section 2.8.4 of ES Chapter 2: Project Description (App Doc Ref 5.2.2) [**APP-034**] describes that the new pumping station at Waterbeach does not form part of the development consent sought through DCO and is therefore outside the scope of the Proposed Development and the operational noise impact assessment. The developer of the new pumping station will be responsible for the assessment of potential noise impacts from the pumping station and to comply with all relevant planning requirements. Assessment of cumulative effects is summarised in Tables 4-2 and 4-3 in ES Chapter 22 Cumulative Effects (App Doc Ref 5.2.22)[**AS-044**]. There are no nearby operational noise sources associated with the Proposed Development in the nearby area to the Waterbeach pumping station. There is no overlap between the timing of construction activities related to the Proposed Development and the operation of the pumping station, therefore there are no cumulative impacts to consider in this respect. This matter is also addressed in section 3.9 of CoCC's SoCG with the Applicant.
18.10	Applicant	**Assessment** Table 2-5 of ES Chapter 17 [AS-036] sets out the impact magnitude criteria for operational noise. Please justify your classification of minor impacts being between '0dB and less than +10dB', particularly when noting that +5dB is likely to have an adverse impact in accordance with BS:4142.	It was necessary to allocate level changes to impact classifications to ensure that significance of operational noise impacts complied with section 11 of BS4142. Sensitive receptors within the study area are identified to be medium sensitivity. The following approach was therefore used to allocate noise level changes described in BS4142 to impact classifications: • BS4142 advises where the rating level does not exceed the background sound level, this is an indication of low noise impact depending on the context. This is allocated a negligible impact magnitude. • BS4142 advises a higher rating level that does exceeds the background sound level results in a noise impact greater than 'low' depending on context. It is considered this level of impact is likely greater than negligible and is allocated to the minor impact classification. • BS4142 advises a higher rating level that exceeds the background sound level by around +5dB but less than +10dB results in an adverse impact depending on the context. This impact level range is also allocated to the minor impact classification. Minor impacts therefore includes the range '0dB and less than +10dB' which includes +5dB impacts which are likely to have an adverse but not significant adverse impact. • BS4142 advises a rating level which exceeds the background sound level by +10dB is an indication of a significant adverse impact depending on the context. This impact level range is allocated to the moderate impact classification and would result in significant adverse effects. If the noted +5dB has been used as the threshold for moderate impact, then a rating level above +5dB would be assessed as significant for medium sensitivity receptors whereas the onset of significance in clause (b) of section 11 of BS4142 is +10dB. Moreover, the assessment has made provision to incorporate a magnitude of impact classification corresponding to clause (a) of section 11 of BS4142 for even greater differences as major, which would otherwise not be possible. Therefore, the assessment criteria for significance comply fully with section 11 of BS4142 yet remain consistent with Table 2-8 in ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**].
18.11	Applicant	**Effects** ES Chapter 17 [AS-036] does not refer to the noise and vibration impacts from decommissioning in full (e.g. Table 2-9: Noise and vibration study areas and Construction and Operation and Maintenance (para 2.4.1 – 2.4.6)). It's therefore unclear to the ExA how decommissioning has been considered within the initial consideration of significance of impacts.	Decommissioning activities involve temporary activities equivalent to construction works and are grouped together with activities described within Appendix 17.3 Construction Noise Assessment (App Doc Ref 5.2.17.3) [**APP-135**]. The assessment of decommissioning noise and vibration impacts and likely significant effects use the same study area definitions, methodology and significance criteria as per construction noise and vibration respectively. The Applicant will include the above within the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1.
18.12	Applicant	**Working Hours** The CoCP Part A [APP-068] proposes that construction hours should have an additional hour at the start and end of the working day for mobilisation and maintenance activities. This includes the arrival and departure of the workforce (peak would be approx. 375 staff across all areas).	a) CoCP Part A Section 7.7.8 (App Doc Ref 5.4.2.1) [**APP-068**] states the Principal Contractor would be responsible to undertake and report on monitoring as necessary to maintain compliance with all noise and vibration commitments. The CoCP will be secured through approval of the CEMP under Requirement 9 of the draft DCO (App Doc Ref 2.1) [**AS-139**].

ExQ1	Question to	Question	Response
		a) Whilst it is stated that contractors would be considerate towards neighbours with no raised voices, how would this be controlled or enforced? b) The mobilisation period also includes the refuelling of vehicles, plant and machinery. If, for example, this equipment needs to be moved to be refuelled, this could cause disturbance. How has this (or similar activities during these additional hours) been considered within the ES? c) The wording of the CoCP Part A does not suggest that the list of mobilisation activities is exhaustive - please confirm if this is exhaustive? d) Provide justification for the extension of the proposed working hours to allow for mobilisation which could potentially cause significant noise disturbance, including unknown activities which could cause disturbance. Moreover, please justify why this has not been considered within the ES regarding noise and vibration.	b) and c) The list of activities described is not exhaustive but comprehensive to describe the proposed activities and type of activities that would be undertaken during the mobilisation period. The mobilisation period is intended to enable quiet start-up and pack-down activities to maximise efficiency during working hours without resulting in disturbance due to noise or vibration. Mitigation measures including the application of Best Practicable Means (BPM) also applies to mobilisation activities. This means, on review by the Contractor, BPM to minimise noise emissions could include movement of vehicles at the end of shift to enable refueling without additional movements and prevent any potential disturbance during mobilisation periods. The CoCP Part A includes the use of BPM. The CoCP will be secured through approval of the CEMP under dDCO Requirement 9. d) Section 2.9.5 of Chapter 17 Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] states mobilisation activities are assumed to not include sources that generate high levels of noise or vibration. The mobilisation activities described in CoCP Part A Table 5.1 (App Doc Ref 5.4.2.1) [**APP-068**] do not include sources that generate high levels of noise or vibration and have therefore not been included within the assessment. Mitigation measures including the application of BPM applies to mobilisation activities such that noise would be controlled to minimise impacts where possible. Section 7.7.8 of the CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**] states the Principal Contractor would be responsible to undertake and report on monitoring as necessary to maintain compliance with all noise and vibration commitments including activities during mobilisation periods. The CoCP will be secured through approval of the CEMP under Requirement 9 of the draft DCO (App Doc Ref 2.1) [AS-139].
18.13	Applicant	**Working hours** Within the CoCP Part A [APP-068], the proposed construction working hours states that for very special circumstances, extended working hours would be required. It is not clear whether the three activities listed under the relevant section of Table 5.1 are exhaustive, please clarify. Please also provide justification for why these activities cannot be carried out under the normal core hours proposed.	The three activities are not necessarily exhaustive but are considered comprehensive. These activities have been identified from the proposed construction activities that are likely to fall within this working hour category. Activities such as major concrete pours or contract lifts are likely to require extended working hours due where pausing or stopping these activities within daily shift patterns is not practicable. Abnormal load deliveries including those escorted by the Police may need to occur outside of peak traffic hours for safety reasons. In these special circumstances, abnormal loads would attend site during the extended working hours category. Contract lifts (i.e., lifting of pieces of equipment on crane) are likely to require extended working hours due to weather conditions or due to large lifts that are not practicable during the daily peak working hours. Mitigation to control noise emissions including through the application of BPM are included within the CoCP Part A. The CoCP will be secured through approval of the CEMP under dDCO Requirement 9.
18.14	Network Rail Infrastructure Limited, National Highways	**Working hours** Within the CoCP Part A [APP-068], the proposed construction working hours states that for very special circumstances, extended working hours would be required. Under table 5.1 regarding this matter, the Applicant states that *Network Rail and/or National Highways are expected to stipulate a requirement for 24 hour working in relation to works under or adjacent to their asset*. Please confirm whether you intend to stipulate a requirement for 24 hour working as suggested by the Applicant and provide justification if so.	
18.15	Applicant	**Working hours** Within the CoCP Part A [APP-068], the proposed construction working hours states that continuous working hours would be required for specific construction activities. It is not clear whether the four activities listed under the relevant section of Table 5.1 are exhaustive because ES Chapter 17 [AS-036] refers to other specific activities e.g. the operations at shafts 3 and 5 would be 24hr working for 2 years - please clarify. Does the CoCP Part A need updating? Please also provide justification for why these activities cannot be carried out under the normal core hours proposed.	The Code of Construction Practice Part A (CoCP) Part A (Doc 5.4.2.1) [**APP-068**] describes activities with continuous working hours include: • Tunnelling and underground work. • Shaft Dewatering or over pumping. • Network rail and/or National Highways works under or adjacent to their assets (which includes Horizontal Directional Drilling works). • Horizontal Directional Drilling (HDD) works. This list is expected to be exhaustive and no other activities with continuous working hours are proposed.

ExQ1	Question to	Question	Response
			ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] also considers generator noise sources at compounds which would operate 24/7 to provide electrical power for safety and security systems. The continuous tunnelling activities at Shaft 3 and 5 described in ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] are assumed will take approximately 5 months. Shaft dewatering are also assumed to occur during continuous working hours. Other construction activities at these locations fall within the Waste Water Transfer Tunnel works which overall are expected to take approximately 18 months to 2 years to complete.
18.16	Applicant	**Working Hours** Within the CoCP Part A [APP-068], the proposed construction working hours states that there may be over running work and that *whilst every effort will be made to ensure that this does not happen there may be some occasions when a construction activity over runs and cannot be paused until it has been completed and/or made safe*. It is noted that this is not referred to within ES Chapter 17, but would be secured as part of the dDCO through R8. Please therefore clarify how this has been assessed within the ES. Furthermore, please justify why this should be included within the CoCP at all, given that construction works should be carefully planned at all times. Please provide any precedents for where this has been included in other DCO applications.	Assessment of noise and vibration construction impacts considers construction activities within relevant working hours. The ES does not include specific assessment of potential over-runs. It is, however, expected any over-runs would be infrequent and exceptional. On this basis due to duration and frequency of potential over runs noise impacts due to over-runs may result in temporary short-term disturbance, but would not result in new significant effects. The CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**] acknowledges that in practice there is a level of uncertainty within planned construction activities. Whilst all best effort will be made to complete construction works within planned working hours circumstances may require exceptional over-running due to processes that cannot be paused or to maintain safety.
18.17	CCoC, CCC, SCDC	**Working hours** Do you consider the proposed construction working hours within the CoCP Part A [APP-068] (Table 5.1) to be acceptable in terms of the impacts which may be generated in relation to noise and vibration to nearby sensitive receptors?	
18.18	Applicant	**Assessment** Para 2.9.6 of ES Chapter 17 [AS-036] regarding construction states that the *mobilisation activities are assumed to not include significant sources of noise or vibration. Assessment of noise and vibration impacts therefore does not consider mobilisation periods*. Chapter 17 does go on to assess the impacts of construction traffic. The ExA is not clear on whether the impacts of construction traffic include the impacts of the workforce arriving and departing the site - please clarify. If it does not, please demonstrate how the arrival and departure of the workforce would not have a significant impact on sensitive receptors.	Section 2.9.5 of ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] states mobilization activities are assumed to not include sources that generate high levels of noise or vibration. The activities described in Table 5.1 of CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**] do not include sources that would generate high levels of noise or vibration and have therefore not been included within assessment of construction activities at construction working areas. Construction traffic using the wider road network, which includes the arrival and departure of the workforce, is not limited spatially to one area of the works and has the potential to affect areas beyond the Scheme Order Limits. Arrival and departure of the workforce is also not limited only to mobilization periods. Assessment therefore consider changes in traffic noise due to construction traffic in accordance with DMRB LA 111 methodology. Section 4.2.4 and 4.2.5 of ES Chapter 17 Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] describe assessment of construction traffic which includes arrival and departure of the workforce to construction sites using with the wider road network. The assessment notes that temporary noise disturbance due to construction traffic may occur at receptors during peak construction activity, however, resulting noise impacts are assessed to be negligible or minor adverse and not significant. To minimize construction traffic noise impacts and potential disturbance during peak construction activity, secondary mitigation measures include the implementation of the Construction Traffic Management Plan (CTMP) to manage construction traffic. Mitigation measures including the application of BPM also applies to mobilization activities and construction traffic. Noise impacts from these construction activities would be controlled to minimize impacts where possible using BPM.
18.19	Applicant	**Assessment** Para 2.9.17 of ES Chapter 17 [AS-036] regarding operational noise impacts states that testing of emergency power generators would occur weekly, please justify why have the noise impacts been scoped out of the assessment on noise and vibration on sensitive receptors, given that the flare stack has been scoped-in to the assessment on a worst-case scenario basis and appears that it would be used less frequently? How long does testing last, and is it likely to impact sensitive receptors? What are the noise and vibration assumptions for this equipment?	Sections 2.9.17 and 2.9.18 of ES Chapter 17 Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] provides a summary of assumptions regarding the flare stack and emergency generators. Emergency generators would not be used during typical operation. Generator testing would be conducted during daytime periods only which minimises potential impacts by avoiding more sensitive times of the day. It is expected under electrical power failure, emergency generators would be used for relatively short durations only (expected to be up to a few hours only in emergency circumstances). The site layout design also minimises noise impacts from emergency generators during testing or emergency use due to their location at a low level within the earthwork embankment. On this basis, noise from back-up power systems were excluded from the assessment in ES Chapter 17 Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**].

ExQ1	Question to	Question	Response
			Generator noise emissions would not be significantly greater than other individual source of noise at the site during operation (i.e. due to occupational noise requirements for employees working at the site). Overall noise levels at the nearest receptors during emergency generator testing would therefore not significantly increase prediction results and would not affect assessment outcomes or significance. The flare stack would be used to prevent excess gas pressure for safety reasons and would not be used during typical operation. The flare stack operation is for safety reasons only but could operate during day- or night-time periods. It is not known how long the flare stack would operate for in each event. The flare stack would be used for required periods to enable safe operation of the WWTP site. Due to the elevated location of the flare stack, exhaust noise has the potential to affect a wider area compared to the emergency generator. For these reasons noise from the flare stack was included to represent a reasonable worst case scenario.
18.20	Applicant	**Assessment** Why did the noise surveys include a combination of unattended measurements (measuring noise conditions continuously over a period of approximately one week – 5 locations) and attended measurements (completed during the daytime only – 6 locations) – why weren't unattended measurements used for all measurements? Does a lack of night-time baseline data for the attended measurements ensure reliable survey results, particularly noting that more surveys were attended than unattended?	The survey locations selected combined short term attended and long term unattended measurements. Measurements were undertaken at locations representative of the closest noise sensitive receptors to construction and operational noise sources to provide baseline noise information. There are several factors that are considered when selecting baseline measurement locations including: • Security and safety of staff, general public and equipment. • Location and likelihood of potential impacts at sensitive receptors. • Suitability to attain data at sensitive receptors representative of surrounding noise sources. • Practicality, access and cost. The survey locations were reviewed and agreed with Local Planning Authority Environmental Health Departments during EIA Scoping stage and Technical Working Group meetings in November 2021 and February 2022. These factors were considered in selecting measurement locations to provide a representative baseline dataset for the purposes of assessment. Unattended measurements were not deemed suitable at all locations for several reasons including practicality and security. Unattended measurement locations were selected near to sensitive receptors potentially affected by construction and/or operational noise sources. Attended measurement locations were selected near to sensitive receptors potentially affected by construction noise sources to supplement unattended data. Measurement results were analysed and assigned to representative receptor locations. In addition to observations from unattended and attended measurements, analysis included comparison of daily and diurnal patterns from unattended measurement results to correlate with attended measurements which provided daytime data only. Assigned night-time baseline noise levels are typically low at representative receptors where the nearest measurement undertaken was attended (e.g. ST-3, ST-4, ST-5). Low baseline noise levels provide a reasonable worst case assessment of noise impacts such that high construction noise levels at receptor locations would also likely result in an increase in ambient noise levels of 5dB or more due to construction noise. The outcomes of night-time noise assessment due to construction noise is therefore not affected by baseline noise levels where the existing baseline noise levels are low. The baseline data collected is therefore considered representative and suitable for the purposes of assessment. Baseline noise measurements assumptions and limitations and a summary of findings are described in sections 2.9.23 to 3.1.12 of ES Chapter 17 Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**]. Baseline noise surveys are described in full within ES Appendix 17.2 Baseline Noise Report (App Doc Ref 5.2.17.2) [**AS-102**].

<table>
<tr><th>ExQ1</th><th>Question to</th><th>Question</th><th>Response</th></tr>
<tr><td>18.21</td><td>CCoC, CCC, SCDC.</td><td>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?</td><td></td></tr>
<tr><td>18.22</td><td>Applicant</td><td>Mitigation
ES Chapter 17 states [AS-036] 4.2.61 It is required that building condition surveys are undertaken prior to construction works at any sensitive buildings, including historic or listed buildings that are located near works where there is potential risk vibration would exceed SOAEL (1.0mm/s PPV). This requirement is included within the CoCP Part A. Please direct the ExA to where in the CoCP Part A this is secured.</td><td>Noise and Vibration is discussed in Section 7.7 of the CoCP Part A (App Doc Ref 5.4.2.1) [APP-068].

The specific measures relating to building condition surveys are set out within Section 3 of ES Appendix 2.2 Code of Construction Practice Part B (App Doc Ref 5.4.2.2) [AS-161] under Noise and Vibration topic areas for each part of the Scheme. The CoCP will be secured through approval of the CEMP under Requirement 9 of the draft DCO (App Doc Ref 2.1) [AS-139].</td></tr>
<tr><td>18.23</td><td>Applicant</td><td>Assessment
ES Chapter 17 [AS-036] identifies baseline noise data and predicated noise levels at various receptor sites. At receptors RC2, RC5, RC9, RC17, RC22 and RC27 the predicted noise levels exceed the night-time SOAEL between 11dB and 18dB (and are also above the ambient level by up to 27dB). Please justify why you consider these effects to be minor or moderate adverse, rather than major adverse, with reference to the criteria set out in Table 2-5 and to the definition of the significant observed adverse effect level (SOAEL).</td><td>The Applicant notes there are drafting errors in ES Chapter 17 Noise and Vibration (App Doc Ref 5.2.17) [AS-036] relating to construction noise impacts during night-time assessment periods within sections 4.2.30, 4.2.86 and 4.2.88 and subsequent respective significance of effects sections.

Section 4.2.30 reports that night-time construction noise impacts due to Shaft 4 enabling works at RC22 are moderate adverse. These impacts are actually major adverse.

Section 4.2.86 reports that night-time construction noise impacts due to HDD works at RC2, RC5, RC17, RC22 and RC27 are moderate adverse. These impacts are actually major adverse.

Section 4.2.88 reports that night-time construction noise impacts due to excavation, trenching and installation of pipework activities at RC5, RC9 and RC22 are moderate adverse. These impacts are actually major adverse.

It is noted mitigation measures have been included relating to these activities and major impacts to avoid significant adverse effects and minimise adverse impacts; these measures include restriction of working hours during Shaft 4 enabling works; use of solid site hoarding or temporary acoustic barriers during continuous horizontal directional drilling; application of BPM to control noise emissions.

The assessment outcomes accounting for the above corrections in each case are, however, unchanged. Whilst the magnitude of impact for these receptors is major instead of moderate the assessment of final significance is unchanged.

The Applicant will include the above within the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1.</td></tr>
<tr><td>18.24</td><td>Applicant</td><td>Continuous construction activities
Please set out (or signpost) a list of construction activities which are continuous and would require continuous construction work through the night (such as dewatering of shafts, tunnelling activities at drive shafts, and large concrete pours within the area of land). Please detail the predicted / likely timescales for these works.</td><td>Table 1-1 in ES Appendix 17.3: Construction Noise Assessment (App Doc Ref 5.4.17.3) [APP-136] describes the assumed durations for each construction activity within the construction noise assessment. Table 1-1 includes a description of continuous construction activities and likely durations.

<table>
<tr><td>Compound</td><td>> 40 days.
Assumed 12 months</td><td>Core,
Assumed 24/7 for site generators</td></tr>
<tr><td>Horizontal Directional Drilling</td><td>Worst case 4 weeks per HDD for larger crossings (e.g. at A14 crossing and River Cam, to include setup and demobilisation per site). Shorter durations for road and smaller HDD drill shots.</td><td>Continuous 24/7 during drill shot</td></tr>
<tr><td>Tunnelling (Tunnel drives from Shaft 3 and Shaft 5)</td><td>5 months</td><td>Continuous 24/7</td></tr>
<tr><td>Shaft Dewatering (Receive shaft dormant while pipe-jacking)</td><td>Up to 9 months</td><td>Continuous 24/7</td></tr>
</table></td></tr>
</table>

ExQ1	Question to	Question	Response
18.25	Applicant	**Mitigation** ES Chapter 17 [AS-036] states in regard to assessing the effects of construction noise on nearby receptors on a number of occasions that *due to the nature of these activities the enabling works would only take place within normal construction hours and are unlikely to occur during these periods unless under exceptional circumstances* (e.g. para 4.2.21, 4.2.25, 4.2.30, 4.2.31 etc). What controls could be put in place to ensure that enabling works would only take place within normal construction hours, particularly noting the proposed mobilisation hour either side of the core working hours?	Paragraphs 4.2.21, 4.2.25, 4.2.30, 4.2.31 within ES Chapter 17 Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] relate to enabling and construction works for the Proposed WWTP and Transfer Tunnel and specifically to works at Shaft 4. Assessment results determine that without secondary mitigation Shaft 4 enabling works would not result in significant adverse effects at the nearest receptors during Weekday daytime, Saturday morning and Shoulder hours. Assessment determines that Shaft 4 enabling works without secondary mitigation would result in significant effects during Evenings, Saturday afternoons, Sundays and public holidays, and night-time assessment periods. Secondary mitigation measures are included to reduce noise levels and restrict working hours to prevent significant adverse effects and minimize potential noise impacts. To prevent significant adverse effects during night-time, secondary mitigation is proposed including restriction of working hours relating to Shaft 4 works. These works during core hours will start no earlier than 07:00 at this work site (Shaft 4). This mitigation measure is included within Section 3.2 of the CoCP Part B (App Doc Ref 5.4.2.2) [**APP-069**]. Restriction of working hours applies also to all construction activities including mobilization activities. Secondary mitigation in the form of solid site hoarding or temporary acoustic barriers will also be provided to minimize noise levels and prevent significant adverse effects from Shaft 4 enabling works during Evenings, Saturday afternoons, Sundays and public holidays. This mitigation is implemented within Section 3.2 of the CoCP Part B (App Doc Ref 5.4.2.2) [**APP-069**]. Additional controls or restriction of working hours are not required to prevent significant adverse effects. Mitigation measures including the application of BPM will be applied to minimise noise impacts which can include scheduling of noisy activities during working hours to avoid more sensitive times. Mitigation measures including use of BPM are implemented through the CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**]. Section 2.9.5 of ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] states mobilization activities are assumed to not include sources that generate high levels of noise or vibration. The activities described in Table 5.1 of CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**] do not include sources that generate high levels of noise or vibration and have therefore not been included within assessment. Mitigation measures including the application of BPM applies to mobilization activities such that noise would be controlled to minimize impacts where possible.
18.26	Applicant	**Assessment and mitigation** Where some moderate adverse effects have been identified in relation to noise impacts from construction work within ES Chapter 17 [AS-036], it is concluded that the significance of the effect is reduced because the works occur over a large area and impacts would reduce over the construction programme (e.g. para 4.2.39, 4.2.92, 4.2.95, etc). Please provided further justification regarding how this reduces the impacts. It is also concluded that the moderate adverse impact is unlikely to occur for an extended duration (i.e. not more than 10 in 15 consecutive days or, not more than 40 days in a 6 month period), therefore the significance of the effect is reduced. How would the length of the moderate adverse impacts be controlled to ensure a reduction in the significance of effect as proposed?	The construction noise predictions and assessment assumes reasonable worst case locations of construction activity within working areas. These locations assumed are relatively close to each representative receptor location to represent the worst case noise levels during construction. Some working areas, including the Proposed WWTP, are large and construction works will be phased over these areas. Over the construction programme activities will be located typically further away from receptors compared to the scenario representing the reasonable worst case locations. The assessment accounts for the proposed works and duration of works within working areas. The resulting noise impacts are reduced from assessment at these worst case locations. Managing the duration of works within a specific working area such that works do not occur for an extended duration in any one place is inherent in the nature of the works and will be controlled through the construction phases in each working area. Mitigation measures can be applied by the Contractor to control duration of works where required to minimise noise impacts. These measures would be considered as part of BPM implemented through the CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**]. The CoCP is secured through approval of the CEMP under Requirement 9 of the draft DCO (App Doc Ref 2.1) [**AS-139**].
18.27	Applicant	**Assessment** Para 4.4.14 of ES Chapter 17 [AS-036] states that *results during the night-time period indicate exceedances of LOAEL (highlighted blue) due to decommissioning activities at RC16 and RC17. None of these impacts increase the existing ambient noise level by +5dB*. However, table 4-29 indicates that RC16 and RC17 would experience an increase of 11dB and 8dB respectively from the ambient baseline. Please correct the information accordingly. Does this affect the conclusion that the impacts would be minor adverse?	Noise levels from decommissioning activities are lower than ambient noise levels not greater than. Table 4-29 in ES Chapter 17 Noise and Vibration (App Doc Ref 5.2.17) [**AS-036**] shows predicted free-field noise levels from decommissioning activities are 48 dB $L_{Aeq,T}$ at RC16 and 48 dB $L_{Aeq,T}$ at RC17. Baseline noise levels are also provided in the table which are 59 dB $L_{Aeq,T}$ at RC16 and 56 dB $L_{Aeq,T}$ at RC17. Predicted noise levels from decommissioning activities alone are therefore 11dB and 8dB lower instead of higher than existing ambient noise levels. As a result the combined noise level from decommissioning and baseline noise levels does not increase the existing ambient noise level by 5dB or more. This does not affect the assessment outcomes.

<table>
<tr><th>ExQ1</th><th>Question to</th><th>Question</th><th>Response</th></tr>
<tr><td></td><td></td><td></td><td></td></tr>
<tr><td>18.28</td><td>Applicant</td><td>Mitigation
Para 4.4.17 of ES Chapter 17 [AS-036] states that decommissioning works in this area would not be undertaken between 23:00 and 06:00. Please identify where this is controlled within the CoCP.</td><td>Table 1-1 in ES Appendix 17.3 Construction Noise Assessment (App Doc Ref 5.4.17.3) [APP-136] describes the working hours for decommissioning activities considered within the decommissioning noise assessment. Decommissioning works would be undertaken during core hours only but may include exceptional working hours for activities that cannot be undertaken during normal working hours (e.g. abnormal load deliveries). Core working hours are set out within Table 5.1 in CoCP Part A (App Doc Ref 5.4.2.1) [APP-068] and summarised as follows:

• Winter core hours (October to March)
07:00 to 18:00 Monday to Friday
08:00 to 16:00 Saturday
Daily mobilisation – plus up to one hour before and after for mobilisation/maintenance activities
• Summer core hours (April to September)
06:00 to 19:00 Monday to Friday
08:00 to 18:00 Saturdays
Daily mobilisation – plus up to one hour before and after for mobilisation/maintenance activities

These working hours for decommissioning works will be included within the CEMP and secured through Requirement 9 of the draft DCO (App Doc Ref 2.1) [AS-139].</td></tr>
<tr><td>18.29</td><td>Applicant</td><td>Additional information
Para 4.6.6 of ES Chapter 17 [AS-036] describes the in-combination effects of construction and that the most sensitive receptor location to combined impacts is Red House Close due to the horizontal directional drilling and Shaft 4 construction activities. It is stated that this would result in new exceedances of LOAEL during shoulder periods, evenings and weekends, however, it would not exceed SOAEL and would not result in new significant adverse effects. Please provide the predicted noise impacts in tabular form for cross referencing.</td><td>Noise level results for inter-related effects at representative receptors RC17, RC19 and RC22 are described in Section 4.6.6 of ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [AS-036]. Noise level results are provided below in the following summary tables. The results present separate activities and combined effects.

The effect of secondary mitigation (i.e. solid site hoarding or temporary acoustic barriers at Shaft 4, solid site hoarding or temporary acoustic barrier for continuous HDD works and restriction of working hours to exclude night-time hours at Shaft 4) is included within these results. It is assumed 10dB attenuation is provided by barriers or screening in accordance with BS5228-1 guidance and as described in section 2.9.8 of ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [AS-036].

Summary tables are provided for shoulder periods, evenings and weekends assessment time periods. The night-time period is excluded from potential inter-related effects due to inclusion of secondary mitigation. Cells shaded blue indicate exceedances of LOAEL and cells shaded orange indicate exceedances of SOAEL for relevant assessment time periods.

Inter-related effects, predicted noise levels, weekday daytime (08:00 – 18:00) and Saturday morning (08:00 – 13:00)
<table>
<tr><th></th><th colspan="3">Calculated free-field receptor noise level, dB $L_{Aeq,T}$</th></tr>
<tr><th>Activity</th><th>RC17, Northern Bridge Farm</th><th>RC19, Poplar Hall</th><th>RC22, Red House Close</th></tr>
<tr><td>Early morning baseline, dB $L_{Aeq,T}$</td><td>59</td><td>59</td><td>59</td></tr>
<tr><td>Early evening baseline, dB $L_{Aeq,T}$</td><td>56</td><td>56</td><td>56</td></tr>
<tr><td>Shaft 4 Enabling</td><td>38</td><td>49</td><td>55</td></tr>
<tr><td>Waterbeach Pipeline, HDD</td><td>57</td><td>38</td><td>58</td></tr>
<tr><td>Shaft 4 Enabling, with Waterbeach Pipeline, HDD</td><td>57</td><td>49</td><td>60</td></tr>
</table>
Inter-related effects, predicted noise levels, evenings (19:00 – 22:00), Saturday afternoons (14:00 – 22:00), and Sundays and public holidays (07:00 – 21:00)
<table>
<tr><th></th><th colspan="3">Calculated free-field receptor noise level, dB $L_{Aeq,T}$</th></tr>
<tr><th>Activity</th><th>RC17, Northern Bridge Farm</th><th>RC19, Poplar Hall</th><th>RC22, Red House Close</th></tr>
<tr><td>Evening baseline, dB $L_{Aeq,T}$</td><td>56</td><td>56</td><td>56</td></tr>
<tr><td>Saturday afternoon baseline, dB $L_{Aeq,T}$</td><td>53</td><td>53</td><td>53</td></tr>
<tr><td>Sunday baseline, dB $L_{Aeq,T}$</td><td>56</td><td>56</td><td>56</td></tr>
<tr><td>Shaft 4 Enabling</td><td>38</td><td>49</td><td>55</td></tr>
</table></td></tr>
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<table>
<tr><th>ExQ1</th><th>Question to</th><th>Question</th><th>Response</th></tr>
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<tr><td>Shaft 4 Enabling, with Waterbeach Pipeline, HDD</td><td>57</td><td>49</td><td>60</td></tr>
</table>

Tables show inter-related effects during these activities would result in noise levels that may exceed LOAEL but would not exceedance SOAEL during these assessment periods. These impacts would not result in significant adverse effects.
</td></tr>
<tr><td>18.30</td><td>CCC, CCoC, SCDC</td><td>Further assessment
Do you consider the proposed noise and vibration management plan, which would be required by R9 of the dDCO [AS-139], should include further noise assessments of sensitive receptors in accordance with BS4142, and/or should include real time monitoring and management of noise in order to suitably mitigate effects of the proposed construction works?</td><td></td></tr>
<tr><td>18.31</td><td>CCC, CCoC, SCDC</td><td>Review of additional information submitted by the Applicant
Please review and comment on the acceptability of the draft Construction Environmental Management Plan [AS-057] in relation to noise and vibration.</td><td></td></tr>
</table>

19. Odour

ExQ1	Question to	Question	Response
19.1	Applicant	**Drafting error** Table 1-2 of ES Chapter 18 Odour [APP-050] includes an incomplete link to another document - Mitigation measures have been presented ***in Error! Reference source not found***. Please update the document accordingly.	The Applicant recognises the drafting error in ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**]. The following should be stated: "Mitigation measures have been presented in the Code of Construction Practice (CoCP) Part A & B (Appendix 2.1 and 2.2 App Doc Ref 5.4.2.1 & 5.4.2.2), Outline Commissioning Plan (Appendix 2.4, App Doc Ref 5.4.2.4) and Outline Decommissioning Plan (Appendix 2.3, App Doc Ref 5.4.2.3) to prevent and mitigate odour emissions. These include design-specific mitigation (e.g. covered processes and positioning of odorous processes away from receptors) and management practices." This error has been acknowledged in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1.
19.2	Applicant	**Assessment** Please justify why Poplar Hall was not identified as a specific odour receptor for the purposes of ES Chapter 18 [APP- 050] and why the odour impacts of the Proposed Development were not assessed on this receptor?	Poplar Hall Farm was identified as a specific odour receptor for the qualitative assessment and is presented in Table 1-2 of ES Appendix 18.1 Odour Assessment Method and Effects Summary (App Doc Ref 5.4.18.1) [**APP-137**] and Figure 18.2 in ES Book of Figures Odour (App Doc Ref 5.3.18.2) [**APP-065**]. However, the qualitative Source-Pathway-Receptor risk assessment for Poplar Hall Farm (receptor 22) was not required as it would not have produced a higher level of risk than qualitative receptors 'Northern Bridge Farm' (receptor 18) and 'Red House Close' (receptor 23), which are situated closer to odour emitting activities from the existing Cambridge WWTP as demonstrated in Figure 18.2 in ES Book of Figures Odour (App Doc Ref 5.3.18.2) [**APP-065**]. For the quantitative dispersion modelling assessment, discrete model points representative of sensitive receptors (residential and schools in this assessment) are selected to predict impacts at specific locations as an indication of the potential odour concentrations at those selected sensitive receptors. Where there is a risk that odour concentrations may cause significant adverse effects, additional discrete receptors are added to understand the full scale of the effect. Receptors 'Property east of Horningsea Road, Fen Ditton' (receptor 3) and 'Biggin Abbey' (receptor 4) presented in Table 1-1 of ES Appendix 18.1 Odour Assessment Method and Effects Summary (App Doc Ref 5.4.18.1) [**APP-137**] and Figure 18.1 in ES Book of Figures Odour (App Doc Ref 5.3.18.2) [**APP-065**] were selected to represent high sensitivity receptors to the west of the proposed WWTP. These are closer to the Proposed Development than Poplar Hall Farm. Table 2-3 of ES Appendix 18.1 Odour Assessment Method and Effects Summary (App Doc Ref 5.4.18.1) [**APP-137**] and ES Chapter 18: Odour

ExQ1	Question to	Question	Response
			(App Doc Ref 5.2.18) [**APP-050**] demonstrates that modelled odour concentrations are low in these locations. The predicted operational odour contour plot presented in Figure 4-1 in ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**] and Figure 18.1 in ES Book of Figures Odour (App Doc Ref 5.3.18.2) [**APP-065**] demonstrates that predicted odour concentrations at Poplar Hall would be below $1.5ou_E/m^3$. Modelled odour concentrations less than $1.5ou_E/m^3$ are considered to have a 'very small' magnitude of impact equating to a 'Negligible' (not significant) effect regardless of sensitivity/value of receptors. This is in accordance with assessment criteria presented in Table 2-4 and Table 2-6 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**]. Furthermore, Figure 4-4 of ES Appendix 18.2 Odour Impact Assessment (App Doc Ref 5.4.18.2) [**AS-104**] presents the extents of the modelled cartesian grid. At the western extent of the modelled grid, modelled odour concentrations are less than $0.3ou_E/m^3$. As Poplar Hall is further west than the extent of the modelled grid, predicted concentrations at Poplar Hall would have been less than $0.3ou_{E/}m^3$, which further supports the rationale to not include it as a discrete receptor in the assessment. Overall, the Applicant considers that Poplar Hall was considered as part of the assessment but due to the reasons above was not included as a discrete receptor.
19.3	Applicant	**Drafting error and clarification** Figure 4-1 of ES Chapter 18 [APP-050] and Figure 18.1 of Book of Figures – Odour [APP-065] do not correlate entirely (e.g. the odour concentration line of 1.5ouE/m3 incorporates receptor no. 2 on Figure 18.1, but excludes receptor no. 2 on Figure 4-1). Please check the figures and update them to ensure that they are both correct. Do any updates affect any of the findings of the ES? Do the aforementioned figures show the impacts of standard operational impacts and abnormal operating conditions?	Table 2-3 in ES Appendix 18.1 Odour Assessment Method and Effects Summary (App Doc Ref 5.4.18.1) [**APP-137**] and Table 4-1 in ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**] show that the modelled odour concentration at receptor no. 2 is 1.24 ou_E/m^3, which is the correct value and is also presented as a contour plot in Figure 4-1 in ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**]. This does not change the conclusions of the assessment as the odour impact presented in Table 4-1 in ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**], which the significance of effect is based upon, is the correct value. The Applicant confirms that the odour contour plots show standard operational impacts only. Abnormal operating conditions have been considered qualitatively as these represent situations that are likely to be infrequent, are unlikely to occur concurrently and are unlikely to occur repeatedly in the same location. The Applicant considers that it is therefore not suitable to use dispersion modelling to predict odour concentrations associated with abnormal operating conditions. The Institute of Air Quality Management 'Guidance on the assessment of odour for planning' states that modelling is only likely to characterise normal operations of the odour source.
19.4	Applicant	**Drafting Error** Para 4.3.17 of ES Chapter 18 [APP-050] states that *the largest predicted odour concentration for the one-hour 98th percentile at existing high sensitivity receptors is 0.5ouE/m3 at Receptor 4, 'Biggin Abbey' a residential property to the north west of the proposed WWTP, and is classed as a Negligible impact.* However, according to Table 2-4 of ES Chapter 18 Odour, an odour exposure level of 0.5ouE/m3 would have a magnitude impact of 'very small'. Please update the effects accordingly.	Table 4-1 in ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**] presents the odour concentration of $0.49ou_E/m^3$ predicted at Receptor 4 'Biggin Abbey', which is less than $0.5ou_E/m^3$, and is used to determine odour impact. Paragraph 4.3.17 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**] rounded this value to the nearest one decimal place for presentation purposes. Notwithstanding the above, if the magnitude of impact for 'Biggin Abbey' was changed from a 'Negligible' to 'Very Small' magnitude of impact (if the impact was rounded up to $0.5ou_E/m^3$), the significance of effect would remain 'Negligible' (not significant) as per the effects criteria presented in Table 2-6 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**]. The conclusions of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**] would not change.
19.5	EA, CCC, CCoC, SCDC.	**Assessment** Do you consider one odour emissions rate survey during July 2019 and three sniff surveys during April and May 2022 to be sufficient for the baseline odour assessment?	
19.6	Applicant	**Assessment** Please explain why only one odour emissions rate survey during July 2019 and only three dates within 2022 were used for the baseline odour assessment, when five years of wind data was used – can this therefore be considered as representative? Regarding the sniff surveys, how can these be considered as worst case scenario data to inform the baseline when they were not carried out during the summer months when it is accepted that odour can be worsened due to increased temperatures?	Odour emissions rates, the odour 'sniff' survey and the meteorological data all serve different purposes within the odour assessment and therefore is not appropriate to conflate the methodology surrounding data capture or content. Paragraph 1.7.2 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**] explains that odour modelling presented within the ES incorporates five years of hourly meteorological data as per IAQM's 'Guidance

ExQ1	Question to	Question	Response
			on the assessment of odour for planning' (IAQM, 2018) to account for variability in weather conditions and so the predicted odour concentrations in the assessment are worst case. As explained in Section 1.1 of ES Appendix 18.3 Sniff Test Survey Report (App Doc Ref 5.4.18.3) [**APP-139**], the sniff survey was undertaken over three separate days. Surveying on different days is important for sniff testing as the weather (e.g. wind, rain, temperature) can affect the type, intensity and offensiveness of odour at the same location. The primary purpose of the odour 'sniff' survey is to confirm whether any cumulative effects need to be considered by identifying other sources of the same type in the study area. As explained in paragraph 3.2.12 of ES Appendix 18.2 Odour Impact Assessment (App Doc Ref 5.4.18.2) [**AS-104**], 'Odour emissions from different types of odour sources are not usually additive in their impacts unless they are of a similar character.' As the primary use of data gathered from the sniff survey was used to identify similar types of odour sources within the study area, and not how intense or offensive the produced odour is, the gathered data during April and May 2022 is considered suitable for the requirements of the survey. The odour emission rate survey was undertaken over four days in July 2019 and provides the basis for input data (emission rates) for the dispersion model where processes are similar to the existing Cambridge WWTP. Odour emissions were monitored in accordance with BS EN 13725 to provide an odour emission rate (i.e. $ou_E/m^2/s$) at individual structures and process areas. This differs from the sniff test, which determines the perceived type, intensity and offensive of odour in the air at different locations. Odour emissions are variable day-to-day and seasonally and so care should be taken when applying emissions rates to dispersion models. Section 4.6 of ES Appendix 18.2 Odour Impact Assessment (App Doc Ref 5.4.18.2) [**AS-104**] describes how emission rates were selected with a focus on managing uncertainties. Historical odour emissions monitoring studies at the Cambridge WWTP were compared from multiple sources (see section 4.6 of ES Appendix 18.2 Odour Impact Assessment (App Doc Ref 5.4.18.2) [**AS-104**] and paragraphs 2.2.21 to 2.2.22 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**] and paragraph 1.5.2 of ES Appendix 18.1 Odour Assessment Method and Effects Summary (App Doc Ref 5.4.18.1) [**APP-137**]), which explains that the emission rate obtained in the summer of July 2019 have been conservatively applied during colder months when emission rates are likely to be much lower. Paragraph 4.6.4 of ES Appendix 18.2 Odour Impact Assessment (App Doc Ref 5.4.18.2) [**AS-104**] explains that a comparison of two summertime surveys with a winter survey shows that emissions from processes associated with raw sewage are lower during winter months by up to a factor of four. The Applicant considers the inclusion of five years of meteorological data, the sniff survey to determine if there are any existing similar odour sources and the approach to derive emission factors for the assessment are appropriate and therefore the surveys that support the model results reported in ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**] are robust.
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?	Emission rates represent an odour unit for an area per second, and can thus be applied to the same types of processes at different sites. The IAQM guidance stipulated the use of emission rates for modelling to be …"obtained either from "standard" emission values for various process or measured values from on-site surveys…" As stated in ES Appendix 18.2 Odour Impact Assessment (App Doc Ref 5.4.18.2) [**APP-138**]: "As the proposed CWWTPR is still at planning stage, all emission rates utilised were estimated values based on historic measured values at the existing Cambridge Water Recycling Centre (WRC) or where no historical value was available, "standard" emission values from literature were used. Where neither were available, professional judgement was used to predict an emission compared to the information available ('no worse than' principle)." These predicted values are a small proportion of the site: some division chambers, pumping chambers etc all included to suit the conservative approach of including all open tanks in the odour modelling. The information utilised from the Existing WWTP was utilised only where it was representative. The conditions (weather, location, new site layout, etc.) is what was modelled to test that the impact would be "negligible" as per the IAQM guidance. In all cases a conservative approach was taken, with test

ExQ1	Question to	Question	Response
			scenarios for lesser impact created (e.g. seasonal variation taken into consideration) to provide confidence in the solution developed.
19.8	Applicant	**Assessment** Please justify why odour impacts of deliveries of waste water and sludge by vehicles, and the operation of the treated effluent discharge outfall to the River Cam were assessed qualitatively rather than quantitatively using survey data from the existing Cambridge treatments works?	The Institute of Air Quality Management (2018) 'Guidance on the Assessment of odour for planning' promotes the use of a multi assessment approach to determine the likely odour impacts, where appropriate. In addition, quantitative dispersion modelling relies on a good level of certainty regarding data inputs to generate accurate predictions and should be reflective of normal operations. Section A1.2.2 of the Institute of Air Quality Management (2018) 'Guidance on the Assessment of odour for planning', which is the basis of the assessment approach, advises that a '*qualitative risk based approach is appropriate for* *…d. Situations where the information has wide uncertainties and its use as input to a detailed predictive dispersion model would be at best a waste of time, money and effort or, worse, would lead to an illusory and false impression of accuracy and precision in the numbers generated*. *…e. When the model is not able to properly represent the reality of the situation being assessed, e.g. if the odour effects are likely to be significantly influenced by accidental, unexpected, or unknown releases. In such instances a qualitative estimate may be more appropriate, on the basis that it is better to be broadly correct than precisely wrong'.* **Deliveries of waste water and sludge by vehicles** As presented in Table 2-11 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**], sludge and waste water deliveries from satellite sites would be made by sealed articulated tankers. As a result, spills and leaks on roads are unlikely, unpredictable, short term and highly-localised they do not form part of normal operational expectations. Connections and inlets for deliveries are designed to be located away from the periphery of the proposed WWTP to maximise the distance between the potential source of odour emissions and sensitive receptors. Transfers are made via sealed connectors and therefore any odour emission during offloading would be intermittent and short-lived. • The nature of odour emissions from delivery vehicles (e.g. sources not located in the same place associated with unpredictable spills/leaks on roads), are transient, would not occur at the same time each day, would be short-term and as such any odour released would be indistinguishable relative to normal operational odour emissions from the proposed WWTP. • Due to the odour risks associated with the unpredictable nature of deliveries by vehicles, the contents would be offloaded into sealed tanks (sludge) and the sealed inlet structure (waste water). These are all connected to the odour control system to treat the air prior to emissions. The odour control units were all included in the odour assessments. Therefore, on the basis of the above the Applicant considers that it is therefore not suitable or necessary to use a quantitative assessment approach (dispersion modelling) to predict odour concentrations associated with deliveries opting instead for a qualitative risk based approach. As mentioned above, the impacts of the contents, once delivered, are included in the odour assessment. **River Cam** Odour emissions from the release of cleaned effluent into the River Cam at the outfall were assessed qualitatively in accordance with guidance set out by the IAQM. The treatment process prior to release of final effluent in combination with the effective design of the outfall to aid aeration and effective mixing of final effluent leads to a source odour potential of 'Small' as assessed in ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**], although it is likely that the outfall would release little to no odour when operational and any odour released would be intermittent, of low intensity and at this stage of treatment it has a neutral hedonic tone/score (hedonic tone/score refers to how unpleasant an odour is). Given the Proposed Development outfall is in approximately the same location as the existing Cambridge WWTP and that the design of the proposed WWTP is improved relative to the existing Cambridge WWTP, the Proposed Development is considered a benefit over the current situation.

ExQ1	Question to	Question	Response
			Receptors closest to the operation of the outfall would be of 'Low' sensitivity as per Table 2-5 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**] as they would be of transient exposure and people would reasonably be expected to be present for limited periods of time. 'High' sensitivity receptors are located 300m downwind and 230m upwind of the outfall. Given the distance between the source and receptor, the likely odour effect is assessed as 'Negligible'. The Applicant considers that the qualitative assessment of the outfall is appropriate to identify potential significant effects and that the inclusion of the outfall in a dispersion model would not change the conclusions of the ES, and would have no impact on the proposed designs. Therefore, the Applicant considers that the assessment meets the requirements set out within the IAQM guidance and the approach to assess these sources qualitatively only is appropriate.
19.9	Applicant	**Sludge deliveries** What are the anticipated odour levels from the dried sludge cake leaving the treatment works? What is the anticipated road route of the vehicles transporting the dried sludge cake? Is odour from the sludge cake likely to be noticeable at sensitive receptors when being transported from the treatment plant?	• There are an average of 10 heavy good vehicles per day exporting treated sludge cake (see Table 5-3 of ES Chapter 2: Project Description (App Doc Ref 5.2.2) [**APP-034**], from the Proposed Development which has not increased from the number of exports from the existing Cambridge WWTP. The operational HGVs at intended to use the A14 at J34 passing no "high sensitive" receptors on routes between the access road and the A14 J34 slip road. Operational traffic routes are managed by the the Outline Operational Logistics Plan as secured by Schedule 2, Part 1, Requirement 19 (App Doc Ref 2.1) **[AS-139]** of the dDCO. Paragraph 4.3.33 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**] explains that the processed sludge cake will be enhanced treated digested sludge, 'dewatered' for ease of transport. Both the quality the sludge product is treated up to and the less volatile state of the dewatered sludge minimises the potential for odour forming and being transmitted to receptors, which means it is unlikely to be noticeable. The dewatered sludge cake will be transported away from the site in articulated skips, with a pull-over cover used during transit as per ES Appendix 18.4 Preliminary Odour Management Plan (App Doc Ref 3.5.5) [AS-106], which further minimises odour emissions so that effects are assessed to be 'Negligible' (see paragraph 4.3.32 to 4.3.45 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**], which is secured by Requirement 20 of the draft DCO (App Doc Ref 2.1) [**AS-139**].
19.10	Applicant	**Licences and permits** Please clarify if the Preliminary OMP mitigation measures for any elements of the proposal would fall outside the Industrial Emissions Directive (IED) permit application (e.g. waste water transfer tunnel vent stack, carbon filter etc maintenance) and if so, what they are? If they fall outside of the IED permit, how are they controlled through the dDCO?	The Industrial Emissions Directive (IED) permit will be regulated by the Environment Agency for anaerobic digestion, within a defined permit boundary for the sludge treatment centre. The Environment Agency cannot regulate, under the IED permit, sources of odour generated beyond the permit boundary. Mitigation measures in ES Appendix 18.4 Preliminary Odour Management Plan (App Doc Ref 5.4.18.4) [**AS-106**] that are expected to fall inside the Industrial Emissions Directive (IED) permit are in relation to the inlet works, sludge treatment centre and sludge storage and treatment, digesters, digested sludge. Storage and treatment and biomethane storage and utilisation, and liquor treatment (addressed in paragraphs 2.3.4, 2.3.5, and 2.3.15 to 2.3.24 of ES Appendix 18.4 Preliminary Odour Management Plan (App Doc Ref 5.4.18.4) [**AS-106**]). For all other elements within ES Appendix 18.4 Preliminary Odour Management Plan (App Doc Ref 5.4.18.4) [**AS-106**] (i.e sewer tunnel and terminal pumping station, primary treatment, secondary treatment, tertiary treatment in paragraphs 2.3.1 and 2.3.6 to 2.3.14 of ES Appendix 18.4 Preliminary Odour Management Plan (App Doc Ref 5.4.18.4) [**AS-106**]), the Applicant refers to Requirement 20 of the draft DCO (App Doc Ref 2.1) [**AS-139**], which states that no commissioning is to take place until a Detailed Odour Management Plan has been submitted to and approved in writing by the relevant planning authority.
19.11	EA	**Permits** Do you agree with the Applicant that *climate change is not expected to alter future baseline odour emissions. Both existing odour sources and the Proposed Development would be expected to comply with the requirements of their environmental permits and mitigate any increases in odour emissions associated with changes in climate* [para 2.2.23 ES Chapter 18 [APP-050]. Do you consider that the	

<table>
<tr><th>ExQ1</th><th>Question to</th><th>Question</th><th>Response</th></tr>
<tr><td></td><td></td><td>environmental permitting process could acceptably control an increase in odour emissions associated with climate change?</td><td></td></tr>
<tr><td>19.12</td><td>EA</td><td>Permits
The Applicant confirms in ES Chapter 18 [APP-050] that the operation of the Proposed Development would require an environmental permit, which would require the operation to have a written Environmental Management System, which includes an OMP. Do you consider the submitted Preliminary OMP to be acceptable and do you have any reason to consider that the environmental permit would not be issued, based on the information available?</td><td></td></tr>
<tr><td>19.13</td><td>EA, CCC, CCoC, SCDC</td><td>Assessment
The IAQM 2018 guidance on assessing odour impacts for planning, in Appendix A1.2.2 states that a qualitative risk-based approach towards assessment is appropriate under certain circumstances. Other than the odour impacts for the operation of the proposed WWTP, the assessment of odour impacts is determined in a qualitative approach. Do you accept the Applicant's approach towards assessment of odour impacts in this regard?</td><td></td></tr>
<tr><td>19.14</td><td>Applicant</td><td>Mitigation
Para 4.2.15 of ES Chapter 18 [APP-050] sets out what is contained within CoCP Part B to mitigate impacts of odour from testing and commissioning. However, this is not the exact wording which is contained on p15 of CoCP Part B [APP-069] (which is what the document implies is included). Please update CoCP Part B accordingly as ES Chapter 18 is more specifically worded.</td><td>The Applicant acknowledges the difference in text in Section 3.3 of CoCP Part B (App Doc Ref 5.4.2.2) [AS-161] and that it should state:

'To ensure effective odour control during the testing and commissioning of the proposed WWTP, regular site inspections by the person accountable for odour issues on site should be undertaken to minimise the risk of causing nuisance and/or loss of amenity. The frequency of site inspections should be increased when activities with a high potential to produce odour are being carried out, e.g., works during high temperature days. An inspection log should be kept and made available to the overseeing authority on request.'</td></tr>
<tr><td>19.15</td><td>CCC, CCoC, SCDC</td><td>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?</td><td></td></tr>
<tr><td>19.16</td><td>Applicant</td><td>Effects
Please provide more justification for the conclusion that the significance of the likely odour effect from abnormal operations, accidents or emergencies would be Negligible at worst in ES Chapter 18 [APP-050] – given that at worst, the source odour is classified as Medium, with a Highly Effective pathway, with an odour exposure risk of Medium, imposed on High sensitivity receptors – please provide additional justification for the conclusion of the significance of effect.</td><td>The current version of Table 2-2 in ES Appendix 18.1 Odour Assessment Method and Effects Summary (App Doc Ref 5.4.18.1) [APP-137] contains a drafting error for odour exposure risk and receptor sensitivity for the 'Operation of the proposed WWTP-abnormal operations accidents or emergencies' works description. Table 2-2 should include the following odour exposure risk and receptor sensitivity for these receptors. The drafting error does not change the likely odour effect of 'Negligible' or the conclusion that effects are not significant. This error has been acknowledged in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1.

<table>
<tr><th>Receptor reference</th><th>Odour Exposure risk</th><th>Receptor sensitivity</th></tr>
<tr><td>Low Fen Drove Way PROW 85/14</td><td>Low</td><td>Low</td></tr>
<tr><td>Proposed footpath/cycleways</td><td>Medium</td><td>Low</td></tr>
<tr><td>A14</td><td>Low</td><td>Low</td></tr>
<tr><td>Land to the south of the A14 used for non-arable farming activities</td><td>Low</td><td>Low</td></tr>
</table>

In line with assessment criteria presented in para 2.2.32 to 2.2.33 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [APP-050], the only receptor with a 'Highly Effective' pathway is the 'Proposed footpath/cycleways', which is defined as a 'Low' sensitivity receptor in accordance with Table 2-5 in ES Chapter 18: Odour (App Doc Ref 5.2.18) [APP-050].

The odour exposure risk at the 'Proposed footpath/cycleways' is 'Medium' (medium source odour potential and highly effective pathway). The IAQM descriptors for magnitudes of odour effects,</td></tr>
</table>

ExQ1	Question to	Question	Response
			presented in Table 2-10 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**], shows that a Medium exposure risk coupled with a Low sensitivity receptor equates to a 'Negligible effect'. Whilst three high sensitivity receptors are identified (Gatehouse, Property to south of Horningsea and Quy Mill Hotel) in Table 2-2 in ES Appendix 18.1 Odour Assessment Method and Effects Summary (App Doc Ref 5.4.18.1) [**APP-137**] for abnormal operations, accidents or emergencies, these all have ineffective pathways and therefore equates to a 'Negligible effect'. As presented in Table 2-2 in ES Appendix 18.1 Odour Assessment Method and Effects Summary (App Doc Ref 5.4.18.1) [**APP-137**], there are no high sensitivity receptors where the odour exposure risk is above Negligible and therefore effects are not significant.
19.17	Applicant	**Effects** Please provide more justification for the conclusion that the significance of the likely odour effect from deliveries of waste water and sludge by vehicle would be Negligible at worst in ES Chapter 18 [APP-050] - given that at worst, the source odour is classified as Small, with a Highly Effective pathway, with an odour exposure of Low, imposed on High sensitivity receptors - please provide additional justification for the conclusion of the significance of effect.	Table 2-2 of ES Appendix 18.1 Odour Assessment Method and Effects Summary (App Doc Ref 5.4.18.1) [**APP-137**] presents the qualitative odour risk matrix and odour effects during operation which shows that, in line with assessment criteria presented in para 2.2.32 to 2.2.33 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**], the only receptor with a 'Highly Effective' pathway is the 'Proposed footpath/cycleways', which is defined as a 'Low' sensitivity receptor in accordance with Table 2-5 ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**]. Based on the odour exposure risk matrix presented in Table 2-9 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**], the odour exposure risk would be 'Low' at the 'Proposed footpath/cycleways' receptor (small source odour potential, highly effective pathway). The IAQM descriptors for magnitudes of odour effects, presented in Table 2-10 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**], shows that a Low exposure risk couple with a Low sensitivity receptor equates to a 'Negligible effect'. Whilst three high sensitivity receptors are identified, (Gatehouse, Property to south of Horningsea and Quy Mill Hotel) in Table 2-2 in ES Appendix 18.1 Odour Assessment Method and Effects Summary (App Doc Ref 5.4.18.1) [**APP-137**] for abnormal operations, accidents or emergencies these all have ineffective pathways and therefore equates to a 'Negligible effect'. There are no high sensitivity receptors where the odour exposure risk as above Negligible and therefore effects are not significant.
19.18	Applicant	**Effects** Please confirm the likely frequency of utilisation of the interception shaft at the waste water transfer tunnel within the existing Cambridge WWTP. Please provide more justification for the conclusion that the significance of the likely odour effect from the use of the vent stack at the existing Cambridge WWTP would be Negligible at worst in ES Chapter 18 [APP-050] - given that at worst, the source odour is classified as Small, with a Highly Effective pathway, with an odour exposure of Low, imposed on High sensitivity receptors - please provide additional justification for the conclusion of the significance of effect.	The interception shaft is a design feature that requires ventilation facilities. The purpose of the ventilation facility is to passively manage air pressure in the tunnel system, a process referred to as natural aspiration. As discussed in paragraph 3.5.2 of ES Appendix 18.4 Preliminary Odour Management Plan (App Doc Ref 5.4.18.4) [**AS-106**], air would enter under typical operations and exit less frequently under extreme operating conditions. Odour could be released via the vent stack when air exits the tunnel system under extreme operating conditions. As the process is passive, and dependent upon air pressure within the sewer, it is not possible to accurately predict frequency or duration of air released from the ventilation facility, only to acknowledge that it would be intermittent, infrequent and short-lived. The ventilation facility would include a carbon filter to remove odour and a vent stack extending to a height of up to 10m (section 2.6.7 of ES Chapter 2: Project Description (App Doc Ref 5.2.2) [**APP-034**]). Whilst the vent stack itself is a design feature intended to minimise odour impact through effective dispersion, the carbon filter reduces the odour intensity. According to Table 2.21 of the European Commission (2018) Best Available Techniques Reference Document for Water Treatment, carbon filters remove between 70-99%, whilst the Applicant's odour control unit (OCU) equipment suppliers guarantee 95% H_2S (hydrogen sulphide) removal performance of their carbon media. Table 2-2 of ES Appendix 18.1 Odour Assessment Method and Effects Summary (App Doc Ref 5.4.18.1) [**APP-137**] presents the qualitative odour risk matrix and odour effects during operation and shows that for the highest odour exposure risk for the 'intermittent odour release from 10m high vent stack' is classified as 'Low' considering the embedded mitigation in the design. This Low odour exposure risk occurs at 'Low' to 'Medium' sensitivity receptors. The IAQM descriptors for magnitudes of odour effects, presented in Table 2-10 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**] shows that for

ExQ1	Question to	Question	Response
			Low exposure risk coupled with a 'Medium' sensitivity receptor equates to a 'Negligible effect'. The odour exposure risk associated with the vent stack at all high sensitivity receptors is described as 'Negligible'.
19.19	Applicant	**Decommissioning** Regarding decommissioning, ES Chapter 18 [APP-050] states that tanks would be drained through the existing treatment process, but that any residual sludge within the primary settlement tanks would be removed via suction pump and either taken offsite for treatment or treated onsite via a process such as a quick lime dosing plant. It is noted that the dosing with lime would be odorous, and the sludge would be stored onsite. a) Please confirm what happens to the sludge once treated with lime – e.g. is it taken offsite? b) Why does the sludge need to be treated onsite with lime creating an odorous process if it is to be taken offsite in any event – could this odorous process occur offsite away from sensitive receptors? c) How long are odorous processes likely to take regarding this matter? d) Please justify the suggested location of the 'dosing facility permanent compound' as shown on Sheet 1 of the General Arrangement Plans [AS-149], which would be nearby to sensitive receptors. Should there be an area identified on the works plans where this treatment cannot occur to protect sensitive receptors? e) Would the dosing facility be removed as part of the decommissioning activities? If so, please identify how this has been considered as part of the ES. If it is not removed, why not?	a) Should it be necessary during commission to treat sludge with lime, the lime dosed sludge will be allowed to reach the required quality parameters (complete treatment), transported off-site and used by recipients (generally farmers) to suit their specific site and products' needs. The Existing Cambridge WWTP permit allows for such activities. b) The sludge can be taken off-site, as mentioned in the original response in ES Chapter 18 [APP-050]. However, AWS can supply various products under their Nutri-bio product range, including limed cake, and the treatment with lime would be in accordance with the Existing WWTP permit. c) We are unable to provide a defined duration, as it will depend on the amount of residual sludge that cannot be treated onsite through the normal sludge treatment process, or taken offsite for treatment. AWS will, in line with their requirements to operate the Existing (and Proposed) WWTP minimise odour, in line with their operating permits. d) The drawing referenced is the permanent work remaining on site after decommissioning, as well as temporary facilities associated with construction associated with the sewer tunnel. Proposed locations for liming and other decommissioning activities were hence not shown on the referenced drawing. The area withing the existing site permitted for activities such as storing sludge is the Northeast corner of the site. e) We confirm the temporary lime dosing facility would be removed as part of the decommissioning activities, should it become necessary to use such facilities. In support of this, refer to the General Arrangement Plan [AS-149] referred to in question (d), that shows all the permanent work remaining after decommissioning. It is considered in the ES as part of the de-commissioning plant and equipment brought to site and removed thereafter. Impacts considered include transport (and associated traffic impacts). No prolonged odour impact is expected from the equipment, as it is cleaned as part of its use and checked at de-commissioning, prior to transport.
19.20	Applicant, EA	**NPSWW** In accordance with para 4.3.9 of NPSWW, do you consider that all potential emergencies have been considered as part of the odour impact assessment (e.g. has the loss of the sludge disposal route been fully considered)?	The assessment of abnormal operations has been considered where the release of odour is a consequence of a design safety feature, such as the emergency release of biogas from digesters via whessoe valves, which would be as a result of a major plant failure. As described in ES Appendix 18.4 Preliminary Odour Management Plan (App Doc Ref 5.4.18.4) [**AS-106**], an emergency would involve the complete failure of the majority of the ventilation facilities throughout the site. Complete failure would only occur due to complete loss of power to the site and the concurrent complete loss of backup power from standby generators. To illustrate how unlikely this would be, the existing WWTP has only lost power twice in the last 25 years, and this was quickly rectified by the network operator and/or operations teams. The Applicant has developed ES Appendix 18.4 Preliminary Odour Management Plan (App Doc Ref 5.4.18.4) [**AS-106**], in which section 4.3 provides measures to be followed during non-normal and emergency conditions. Requirement 20 of the draft DCO (App Doc Ref 2.1) [**AS-139**] requires preparation of a Detailed Odour Management Plan prepared in accordance with the measures in ES Appendix 18.4 Preliminary Odour Management Plan (App Doc Ref 5.4.18.4) [**AS-106**]. This would be a live document with measures tightened as necessary as is standard practice for installations like Proposed Development. AWS as a business manages their sludge treatment and sludge disposal routes from a company wide perspective, to provide options for treatment at alternative facilities should emergencies occur. Anglian Water also carry out validation of sludge disposal routes and make these assessments publicly available in their latest Business Plan and submission to Ofwat. This can be accessed on the Anglian Water website. The NPSWW Accordance Table (App Doc Ref 7.5.1) has been updated in respect of paragraphs 4.3.9 to reflect the above and is being provided at Deadline 1.

ExQ1	Question to	Question	Response
19.21	Applicant	**Additional information – vent shafts** ES Chapter 18 [APP-050] states that the odour impacts of vent shafts have not been modelled, owing to the variability of operation and owing to the embedded measures to minimise odour. Please can more information be provided on the frequency, duration and potential odour impacts from use. It is understood that vents of this nature are commonplace, so could quantitative information be provided on this matter regarding the odour impacts?	The interception shaft is a design feature that requires ventilation facilities. The purpose of the ventilation facility is to passively manage air pressure in the tunnel system, a process referred to as natural aspiration. As discussed in paragraph 3.5.2 of ES Appendix 18.4 Preliminary Odour Management Plan (App Doc Ref 5.4.18.4) [**AS-106**], air would enter under typical operations and exit less frequently under extreme operating conditions. Odour could be released via the vent stack when air exits the tunnel system under extreme operating conditions, most likely a high rainfall event when larger quantities of waste water enter the tunnel displacing air out of the tunnel. As the process is passive, and dependant upon air pressure within the sewer, it is not possible to accurately predict frequency or duration of air released from the ventilation facility, only to acknowledge that odour could be released through the vent shafts and would be intermittent and short-lived. To best manage odour emissions, a chemical dosing facility (see Sheet 1 of General Arrangement Plans (App Doc Ref 4.2) [**AS-149**] would be located on the existing Cambridge WWTP upstream of Shaft 1 to prevent septicity and therefore odour formation. In accordance with best practice (Table 2.21 of European Commission (2018) Best Available Techniques Reference Document for Waste Treatment) for end-of-pipe odour treatment, a carbon filter installation, positioned as integral part of the odour vent shaft, would remove between 70-99% of odour through adsorption minimising odour release to air, whilst the Applicant's odour control unit (OCU) equipment suppliers guarantee 95% H_2S (hydrogen sulphide) removal performance of their carbon media. The addition of the 10m high vent stack would further reduce the impact of residual odour emission that pass through the carbon filter by aiding dispersion and maximising the distance between source and receptor. Section A1.2.2 of the Institute of Air Quality Management (2018) 'Guidance on the Assessment of odour for planning', which is the basis of the assessment approach, advises that a '*qualitative risk based approach is appropriate for:* *…d. Situations where the information has wide uncertainties and its use as input to a detailed predictive dispersion model would be at best a waste of time, money and effort or, worse, would lead to an illusory and false impression of accuracy and precision in the numbers generated*. *…e. When the model is not able to properly represent the reality of the situation being assessed, e.g. if the odour effects are likely to be significantly influenced by accidental, unexpected, or unknown releases. In such instances a qualitative estimate may be more appropriate, on the basis that it is better to be broadly correct than precisely wrong'.* The Applicant therefore considers that, given the intermittent nature of the odour emission and the mitigation measures in place to prevent septicity and odour production, remove odour that is produced via a carbon filter and subsequently disperse it (10m stack), a qualitative assessment, as presented in paragraph 4.3.68 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050]** and Table 2-2 of ES Appendix 18.1 Odour Assessment Method and Effects Summary (App Doc Ref 5.4.18.1) [**APP-137**] is preferable over a quantitative assessment of odour impacts from the vent stack, which would likely lead to an illusory and false impression of accuracy and precision in the number generated.
19.22	Applicant, EA	**Localised odours** ES Chapter 18 [APP-050] states that *some localised areas close to the existing Cambridge WWTP currently experience intermittent odours from its operation, likely due to the age of the plant and historic technology and processes*. However, given that the proposed WWTP would operate under the same permitting regime, what assurances can the Applicant give that localised odours would not occur? When the scheme is taken comprehensively, would the Proposed Development result in an overall betterment in terms of odour impacts on sensitive receptors in the local area, and if so, to what significance would this betterment be?	The Applicant has identified the areas and thus sources of the Existing WWTP that cause intermittent odours from its operation, as well as identified areas that pose a risk of odours from their operation of the Existing and other WWTPs. As such, the following changes between the Existing and Proposed WWTPs have been made in the design of the Proposed WWTP: • Covering and venting of air from the terminal pumping station (TPS) and inlet works through OCU(s); • Improvements in the design configuration of the sludge treatment centre (STC) with all tanks in the STC being covered and either vented to OCU or connected to the biogas system; • Improvements in the operation of the STC such as composting activities and storing of off-specification sludges are not included in the proposed CWWTRP. As a result of the above changes, an overall betterment in terms of odour impact is expected for operators on site and all receptors (not just sensitive receptors in the local area). The significance would be that "negligible" impact is achieved, in line with the IAQM rating system.

ExQ1	Question to	Question	Response
19.23	Applicant	**Assessment** There does not appear to have been assessment of the impact of storm surge overflow and combined sewer overflows from the outfall into the River Cam and the associated odour impacts. Please direct the ExA to where this is contained within the ES or provide further information on this matter.	The Proposed Development would give greater resilience and improved storm management. There will be no combined sewer overflow (CSO) retained at the existing WWTP and no new CSO included at the Proposed Development. As such, there is no assessment of CSOs in the ES. Storm water storage at the proposed WWTP (referred to in the question as 'storm surge overflow') has been included quantitively in ES Appendix 18.2 Odour Impact Assessment (App Doc Ref 5.4.18.2) [**AS-104**] and the predicted impacts form part of the assessment of effects included in the ES. The Proposed Development does include 'storm pipelines' that discharge settled stormwater into the River Cam in a severe event. ES Appendix 20.10 Storm Model Report (App Doc Ref 5.4.20.10) [**APP-160**] shows that in a storm event, the increased stormwater storage at the proposed WWTP would mean that there would be very few, if any stormwater discharges from the proposed WWTP with storm modelling predicting fewer than 1 incident every 10 years. Given the Proposed Development's outfall for the storm discharge pipes is in approximately the same location as the existing Cambridge WWTP and that the use of stormwater discharges are far less likely to occur than from the existing Cambridge WWTP, the Proposed Development is a benefit over the current situation. With reference to the FIDOL factors, storm modelling and information presented in Table 3-1 of ES Appendix 18.2 Odour Impact Assessment (App Doc Ref 5.4.18.2) [**AS-104**], the 'discharge of treated effluent and settled storm flows (during storm events)' to the River Cam would have a very low frequency (1 in 10 years), faint intensity (individual's perception of the strength of the odour), a character (odour unpleasantness) similar to clean river water with neutral hedonic tone, for a duration and location where receptor sensitivity would be low. The Applicant therefore considers that the quantitative assessment of storm water storage and the qualitative assessment of the normal operation of the outfall that has been undertaken is sufficient to identify potential significant effects.
19.24	Applicant	**Assessment** Regarding the sewer air valves for the Waterbeach transfer pipeline, please detail how this has been assessed on a worst case scenario – i.e. have locations nearest the most sensitive receptors been considered? What is the likely frequency and duration of use of the valves?	The Applicant confirms that the most sensitive receptors at the nearest locations were considered in the assessment by considering a 'Highly Effective' pathway and 'High' sensitivity receptors as presented in paragraph 4.3.62 and 4.3.63 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**]. As presented in 4.3.62 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**], overall risk from operation of air valves is 'Negligible' taking FIDOL factors (frequency, intensity, duration, odour unpleasantness and location) into account i.e. low intensity, low odour unpleasantness and short-term duration. Paragraph 2.8.16 of the ES Chapter 2 Project Description (App Doc Ref 5.2.2) [**APP-034**]: "Once the pipeline is commissioned the operation of any air valve would be a very short- term event as the pipeline is pressurised and filled with waste water, and consequently the air volumes to be released are small. Given the very intermittent frequency of operation and the limited quantity of air involved it is not likely that any associated odour would be detected."
19.25	Applicant	**Assessment** Please provide a response to comments from IPs (e.g. [RR-035]) that the existing WWTP creates odours from time to time, at locations outside the modelled zone of detection. Is it likely to be the case that the proposed WWTP would create odour impacts outside those which have been modelled / predicted?	Odour dispersion modelling is a tool used to help predict odour concentrations and guide planning and investment decisions. Odour modelling undertaken for the Proposed Development is based on inputs including worst case emissions and five years of meteorological data to account for variability in weather conditions with the maximum predicted odour concentrations reported. As presented in ES Appendix 18.2 Odour Impact Assessment (App Doc Ref 5.4.18.2) [**AS-104**], predicted odour impacts from the Proposed Development are based on highly conservative assumptions regarding odour emission rates (i.e. summer emissions from the existing Cambridge WWTP, which has old technology, have been applied all year round and sources with no hedonic tone have been included increasing the predicted odour concentrations by approximately 8%). Therefore, modelled odour contours from the Proposed Development are likely conservative, however, it is possible for odour to be present beyond the extent of the contours presented in Figure 4-1 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [**APP-050**].

ExQ1	Question to	Question	Response
			The output of the dispersion model is a 1 hour 98th percentile in line with best practice guidance from multiple sources including the Institute of Air Quality Management 'Guidance on the assessment of odour for planning' and the Environment Agency's H4 Odour Management guidance. This means that the highest 2% of modelled concentrations are removed to account modelled outliers. There is therefore potential for odour concentrations above 1.5 ou_E/m^3 to occur outside the presented contour for isolated hours. The Applicant considers that the odour modelling assessment is based on highly conservative assumptions, follows best practice guidance and provides as robust of a prediction as is possible from a dispersion modelling study.
19.26	Applicant	**Climate change** Regarding the impacts of climate change, please confirm what is the maximum temperature the proposed WWTP has been designed to work within? What type of controls through the environmental permits would be able to mitigate odour impacts as a result of increased temperatures from climate change?	The terminal pumping station and inlet works will be covered and air extracted and treated (odour controlled), to enable the risks of changes in influent characteristics to be easily managed. Post these processes, the higher incoming water temperatures will result in better waste water treatment performance (treatment bacteria work faster at higher temperatures). Higher water temperatures will also result in more heat being available to harvest from the process, reducing the need for biogas to be used for process heat. Two degrees climate change increase can be accommodated on top of the current waste water temperatures variations seen throughout the year, without any further need for intervention or investment to mitigate temperature impacts. Such further interventions may take the form of more heat harvesting, additional odour control, additional insulation or cooling of the digesters to stop them potentially overheating, etc. To specifically address the 'what type of controls' question: the Proposed WWTP Environmental Permits will include the requirement for an Odour Management Plan. The OMP is a structured way to identify, understand, document and manage (or control) odour source on site to minimise odour impacts. A copy of the OMP has been included in ES Appendix 18.4 Preliminary Odour Management Plan (App Doc Ref 5.4.18.4) [**AS-106**].

20. Traffic and transport

ExQ1	Question to	Question	Response
20.1	Applicant	**Transport Assessment (TA)** Please thoroughly check the TA [AS-108] for errors, for example see the paragraph numbering on page 125/554 and missing paragraph numbers elsewhere such as on page 134/554. This will enable the ExA to include clear references in its recommendation report.	The Applicant recognises that the ExA requests correction of cross-references, paragraph numbering and overall formatting in the TA Part 1 (App Doc Ref 5.4.19.3) [AS-108a] and (App Doc Ref 5.4.19.3) [AS-108b]. The Applicant has thoroughly reviewed the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**. The Applicant will make the following changes: • *Page 8* - Correction to reference to Appendix A, Figure A.1 to read Appendix A, Figure A.2. • *Page 8* - Removal of duplicate of paragraph 2.1.1. labelled 1.1.1. • *Pages 32 to 39* - Correction to paragraph referencing, which resets to 2.7.1 on page 32, when it should continue from 2.7.24 on page 31. • *Page 41* - Removal of duplicate of paragraph 3.2.1, (listed as paragraph 3.2.2). • *Page 97* - Paragraph 7.1.3, update to cross-reference for construction route to show Appendix A, Figure A.2. • *Page 104 to 107* - Paragraph 7.1.29, 7.1.32, 7.1.36, 7.1.38, removal of bold formatting on some text. • *Page 110* - Paragraph 7.3.1. removal of bold text and footnote formatting with no text. • *Page 125* - Paragraphs currently showing as 6.3.7 and 6.3.8 to be updated to 9.5.7 and 9.5.8. All subsequent paragraphs in section 9.5 to be renumbered to follow on from this. Cross references to paragraphs within this section to be updated to reflect renumbered paragraphs.

ExQ1	Question to	Question	Response
			• *Page 134* - Paragraph with no number to be renumbered. To be undertaken in conjunction with overall section 9.5 paragraph renumbering. • *Page 137* - Removal of blank paragraph 9.5.29. To be undertaken in conjunction with overall section paragraph renumbering. The Applicant has also identified an error within the ES Volume 4 Chapter 19 Appendix 19.5 Junction Capacity Reports (App Doc Ref 5.4.19.6) **[APP-147].** An outdated model run for 2033 baseline AM was identified as part of this review. It does not affect the results contained within Section 9.5 of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**, which uses the correct model run. This appendix will be updated to show the correct model run for 2033 baseline AM.
20.2	Applicant	**TA** The 'Version History' says that a new Appendix L has been included in Version 3 of the TA [AS-108] and para 5.1.2 of the TA states: *Appendix A, Figure A.37 shows the locations and survey types. Appendix L: ATC Speed / Count Surveys contains the detailed survey results.* However, no survey results have been provided in Appendix L, only an undated drawing showing proposed ATC speed count survey locations. Please address this.	The Applicant recognises that the ExA requests correction to Appendix L 'Survey results' in the TA – showing results are not showing up. The Applicant will update Appendix L of the Transport Assessment Part 2 (App Doc Ref 5.4.19.3) **[AS-108b]** to include the detailed survey results outlined in paragraph 5.1.2 of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** at Deadline 3. The Applicant notes that there are a number of additional tasks requested as part of the questions in this document that require a longer time to complete such as the review of the IEMA assessment method used, or additional technical checks of the junction modelling assessment carried out as part the traffic and transport chapter. The applicant will pick all these additional elements up in a single update to the Transport Assessment as part of Deadline 3 so that a single, fully updated, paper copy can be provided as has been requested, rather than update it multiple times.
20.3	Applicant	**Road Safety Audit (RSA)** In response to the ExA's request in the 10 August 2023 PD, the Applicant's letter dated 29 September 2023 states *The Road Safety Audit (RSA) has been produced which covers the permanent site access and A14 overbridge changes*. However, the RSA that was provided on 29 September 2023 [AS-112] is dated 25 November 2022 and makes no reference to the A14 overbridge changes. Please submit the information that was requested.	The Applicant confirms the Road Safety Audit (RSA) (App Doc Ref 5.4.19.11) **[AS-112]** dated 25 November 2022 is the latest version. It contains a drawing (102375-MND-01-XXDR-C-1101), at the last page of the document, which illustrates the changes required on the A14 bridge. In summary this is a modification of the western side footway to widen it and create a 3m footway, 1m verge and 0.5m offset to the carriageway and replacement of the parapet adjacent to the footway to make it a cycle-compliant barrier. The CCC RSA1 auditors did not mention the parapet proposals in their RSA1 audit report as they only raised issues / problems with the design. Therefore, the conclusion is that they do not have any specific issues with the parapet changes as proposed. The Applicant can confirm that National Highways have commented on the RSA1 audit report (and the RSA1 submitted drawings) have made specific reference to the parapet details in their response to which we have provided a response too and updated one drawing as part of the RSA1 dated 25 November 2022.
20.4	Applicant, CCoC	**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.* a) Please provide a copy of the notes of the 13 April 2021 meeting. 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?	The Applicant attach a copy of the minutes to this document.
20.5	Applicant	**Environmental Statement** New IEMA Guidance about the Environmental Assessment of Traffic and Movement was published in July 2023. Does this have any implications for the methodology or conclusions of ES	A comparison of the 1993 and 2023 IEMA guidance has been undertaken by the Applicant. IEMA guidance provides two rules for the assessment of traffic and transport impacts: Rule 1 and Rule 2.

ExQ1	Question to	Question	Response
		Chapter 19 [AS-038] which was based on the IEMA's 1993 guidance, or does it require any changes to be made to any proposed mitigation?	- Rule 1: Include highway links where traffic flows will increase by more than 30% (or the number of HGVs will increase by more than 30%) - Rule 2: Include highway links of high sensitivity where traffic flows have increased by 10% or more The Rule 1 and Rule 2 requirements are unchanged between the 1993 and 2023 IEMA guidance and this is the key measure used across the assessment of transport impacts. Overall, the Applicant has considered the implications for the ES Chapter 19 (App Doc Ref 5.2.19) **[AS-038]** and they are as follows. For the determining of fear and intimidation, accident, and safety, additional assessment criteria has been added in the 2023 IEMA guidance. The Applicant will review the implications of the changes and provide an update to the assessment at Deadline 3. For the assessment of pedestrian delay and severance, the guidance document referenced in the updated guidance has been used to determine diversionary lengths and the level of impacts. The assessment of amenity has been covered in ES Chapter 11: Community (App Doc Ref 5.2.11) **[AS-028].** The Applicant has reviewed the updated guidance and considers that for Abnormal Indivisible Loads, there is no further assessment required. Peak monthly abnormal indivisible loads (AILs) are indicative at this stage of development, however worst case is likely to be maximum of 10-14 per month in peak construction periods at the proposed WWTP. The Applicant can confirm the AILs will be accessing the proposed WWTP site only via the A14 junction 34. The Applicant can confirm these would be managed through the CTMP (App Doc Ref 5.4.19.7) **[AS-109]** and CoCP Part A (App Doc Ref 5.4.2.1) **[APP-068]** Section 3 which requires the appointment of a Community Liaison Officer who will be responsible for stakeholder liaison which includes a construction forum and to ensure timing with other projects is checked and that required permissions and notifications are achieved prior to AILs being delivered. Schedule 2 Part 1, Requirement 9 of the dDCO (App Doc Ref 2.1) **[AS-139]** requires the measures specified within the CoCP to be contained within the relevant construction environment management plans, and for a detailed construction traffic management plan to be produced which must accord with the measures set out in the construction traffic management plant. The additional cross-referencing text to Air Quality, Noise and Vibration, Biodiversity, Landscape and Visual, Cultural Heritage and Climate and GHG and their transport data requirements has been reviewed and the Applicant confirms no changes are required.
20.6	Applicant	**Environmental Statement – clarification** On page 157 of ES Chapter 19 [AS-038] under the heading 'Operation and maintenance of transfer tunnel' the text (para 4.3.21 and 4.3.22) is identical to the text at 4.3.19 and 4.3.20 which relates to 'Operation and maintenance of the outfall / ditch habitat'. Please clarify and indicate where 'Operation and maintenance of transfer tunnel' is discussed.	The vehicle movements associated with the operation and maintenance of the outfall, and created ditch habitat and the transfer tunnel are the same, with both requiring approximately 1-2 vehicle movements a day. The text at paragraph 4.3.21 makes an incorrect reference to the operation and maintenance of the outfall and created ditch habitat when it should be referring to the transfer tunnel. This reference has now been corrected in ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]**.
20.7	Applicant	**Environmental Statement Chapter 19 Appendix 19.1 Baseline – traffic surveys** Parts of ES Appendix 19.1 [APP-141] are illegible, e.g. PDF page 380/405 Please rectify the issues with this document, add page numbering, and re-issue. When re-issuing documents please also provide a list of changes / updates that have been made.	The Applicant confirms that the following changes have been made to Appendix 19.1: - Addition of page numbers - Amendment to the scaling issue (e.g., Page 380)
20.8	Applicant	**Environmental Statement – clarification Regarding PRoW diversions** ES Chapter 11: Community [AS-028] states at section 1.2 (after para 4.2.35 on page 58 of Revision 2 dated September 2023) that: *The provision of safety gates allowing users to cross the construction working area would reduce the length of the diversion to 770m for users of PRoW 85/6.* On page 44 of ES Chapter 19 [AS-038] it is stated that *In total, the diversion on PRoW 85/6 results in a 770m? added journey length.* At para 4.2.175 of ES Chapter 19 it is noted that: *users of the 85/6 would need to travel an additional 780m to return to back to the 85/6 at Baits Bite*	The Applicant confirms the length of the diversion of PRoW 85/6, with safety gates in place, is up to 770m. Users of 85/6 would be diverted using the existing PRoW 85/8 and via a temporary diversion route to re-join PRoW 85/6. This diversion would be in place for up to 11 months and would be required for the construction of the outfall. The diversion is indicated on Rights of Way Plans Sheet 2 (App Doc Ref 4.6) [**AS-153**]. Assessment of the construction scenarios with and without the installation of safety gates, are presented in the ES Chapter 19 (App Doc Ref 5.2.19) **[AS-038]** for construction impacts on PRoW. Regarding the diversion of PRoW 85/6:

ExQ1	Question to	Question	Response
		Lock. In addition, the figures for 85/8 on Table 4-54 differ from figures in Table 4-53 of ES Chapter 19. Please ensure that all figures are consistent throughout the ES. If there is a reason why figures differ (e.g. between Table 4-53 and Table 4-54 or between chapters) please explain the reason for this.	During the diversion of PRoW 85/6, which would be up to 11 months in duration as per the CoCP Part B (App Doc Ref 5.4.2.2) **[AS-161]**, the diversion route via PRoW 85/8 would be affected by the open cut construction of the treated effluent and storm pipeline. The Applicant notes that PRoW diversion durations are shown incorrectly in Table 2-12 of ES Chapter 19 and that references to '4 months' duration should be corrected to 'up to 11 months.' Without safety gates in place, as shown in Table 4-53 of ES Chapter 19, users of PRoW 85/6 following the diversion route onto 85/8 would need to travel along a temporary diversion to the shared use path on the western side of Horningsea Road. This would increase the total journey length to 1,010m, or an additional journey length of more than 500m, which would result in a major effect on pedestrian delay on PRoW. With safety gates in place, the diversion of 85/6 along PRoW 85/8 and to the shared use path on Horningsea Road would no longer be needed as users would be able to cross the construction works areas for the treated effluent and storm pipeline safely. In this case, the added journey length only accounts for the time users would spend waiting at safety gates (approximately 2 mins) and the added journey length from the diversion onto 85/8. With safety gates in place, the total journey length would be 770m. The Applicant notes that a change needs to be made to the Rights of Way Plans (App Doc Ref 4.6) **[APP-153],** Sheet 2 '4.6.2 Rights of Way Plans' in order to show the safety access gates on PRoW 85/8 and to Schedule 6 of the dDCO (App Doc Ref 2.1) **[AS-139]**. The Applicant will replace the text in the ES Chapter 19 presenting the length, as follows: P44: "In total, the diversion on PRoW 85/6 results in a 770m? added journey length" replaced with "In total, the diversion on PRoW 85/6 results in a 770m total journey length." P44: "This diversion would increase the journey from 150m to 750m, on top of the 170m (equivalent to the distance a user on a PRoW would have covered in two minutes) added as a result of the gated access on PRoW 85/8" replaced with "This diversion would increase the journey from 150m to 750m, including the 170m (equivalent to the distance a user on a PRoW would have covered in two minutes) added as a result of the gated access on PRoW 85/8." Para 4.2.175 "For the footpath (85/6) there would be a short-term diversion of up to 6 months during construction of the outfall" replaced with "For the footpath (85/6) there would be a short term diversion of up to 11 months during construction of the outfall". "780m" has been corrected to "770m". Para 4.2.176: "an additional 1010m" will be replaced with "a total 1,010m". Para 4.2.185: "In total, the diversion on PRoW 85/6 results in a 790m added journey length" replaced with "In total, the diversion on PRoW 85/6 results in a 770m total journey length." Table 4-51: "requiring an increased journey length of 1,010m" replaced with "requiring a journey length of more than 500m, or a total journey length of 1,010m". Table 4-51: "requiring an increased journey length of 1,010m" replaced with "requiring an increased journey length of more than 500m (approximately 860m)". Table 4-54 relating to PRoW 85/8 "Users moving north to join the 130/1 via the 130/2 would have an increased journey of 620m" replaced with "Users moving north to join 130/1 from the 85/8 would have a total journey length of 760m via Horningsea Road."

ExQ1	Question to	Question	Response
			Table 4-54 relating to PRoW 85/8 "Users moving south from the 130/2 to join the 85/8 would walk have an increase journey of 600m using Horningsea Road to reach PRoW 85/6" replaced with "Users moving south from the 85/8 via 130/1 to join the 85/6 would have a total journey length of 760m". There is no change to the magnitude of impact on pedestrian delay with mitigation (with safety gates) shown in Table 4-54 of ES Chapter 19 as the corrected added journey length falls within the same assessment thresholds for pedestrian delay on PRoW. There is no change to the magnitude of impact on pedestrian delay without mitigation (without safety gates) shown in Table 4-53 of ES Chapter 19 as the corrected added journey length falls within the same assessment thresholds for pedestrian delay on PRoW.
20.9	Applicant	**Mitigation plans** Para 3.8.23 of ES Chapter 2 [APP-034] says that *All vehicle and pedestrian movements will be managed via a Construction Transport Management Plan.* Para 3.10.1 of ES Chapter 2 refers to a *green travel plan.* Para 4.5.20 of ES Chapter 19 [AS-038] states: *For this major significant effect on driver delay to be made not significant, an Operational Traffic Management Plan would be necessary in order to clearly manage operational traffic. Measures secured through the Operational Traffic Management Plan (OLTP) / Servicing and Delivery Plan would also form part of further mitigation.* Para 2.7.3 of the Non-Technical Summary [APP-032] refers to an 'Operational Traffic Management Scheme' and para 3.2.8 of ES Chapter 2 refers to an 'Operational Logistics Plan'. The ExA cannot locate a number of these documents or references to them in the dDCO: ▪ Construction Transport Management Plan (not found in application documents or dDCO) ▪ Green Travel Plan (not found in application documents or dDCO) ▪ Servicing and Delivery Plan (not found in application documents or dDCO) ▪ Operational Traffic Management Plan (not found in application documents or dDCO) ▪ Operational Traffic Management Scheme (not found in application documents or dDCO) ▪ Operational Logistics Plan (not found in application documents or dDCO) Please provide an accurate and definitive schedule of the mitigation plans which are referred to in the ES and in the dDCO, including any other management plans not listed above. Please set out: a) The exact name of the document (as it appears on the document); b) Where this is referred to in / secured by the dDCO (Requirement or a Certified Document); c) The Examination Library reference; and Any alternative names that have been used in the ES for each document.	The Applicant recognises that the reference / titles of the above documents should be made consistent across ES Chapter 19, the Non-Technical Summary and ES Chapter 2. The documents listed have been erroneously referred to in ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]** and ES Chapter 2: Project Description (App Doc Ref 5.2.2) **[APP-034]**. The schedule of the mitigation plans is provided below along with the correctly referenced mitigation and management plans: • Construction Transport Management Plan refers to the Construction Traffic Management Plan (App Doc Ref 5.4.19.7) **[AS-109]** • Green Travel Plan refers to the Construction Workers Travel Plan (App Doc Ref 5.4.19.9) **[APP-150]** • Servicing and Delivery Plan refers to the Outline Operational Logistics Traffic Plan (App Doc Ref 5.4.19.10) **[AS-111]** • Operational Traffic Management Plan refers to the Outline Operational Logistics Traffic Plan (App Doc Ref 5.4.19.10) **[AS-111]** • Operational Traffic Management Scheme refers to the Outline Operational Logistics Traffic Plan (App Doc Ref 5.4.19.10) **[AS-111]** • Operational Logistics Plan refers to the Outline Operational Logistics Traffic Plan (App Doc Ref 5.4.19.10) **[AS-111]** They are secured in the dDCO (App Doc Ref 2.1) **[AS-139]** as follows: • The provision for the Construction Transport Management Plan and is secured by Schedule 2, Part 1, Requirement 8 (App Doc Ref 2.1) **[AS-139]** • The provision for the Construction Worker Travel Plan is secured by Schedule 2, Part 1, Requirement 8 (App Doc Ref 2.1) **[AS-139]** • The Outline Operational Logistics Plan is secured by Schedule 2, Part 1, Requirement 19 (App Doc Ref 2.1) **[AS-139]**
20.10	Applicant	**Construction phase – clarification** ES Chapter 19 [AS-038] makes reference at para 4.2.244 to: *a temporary parking restriction on Bannold Road junction with Denny End Road / Car Dyke Lane.* Please indicate on a map where this is located.	The Applicant will produce a map showing the temporary parking restriction at the Bannold Road junction with Denny End Road / Car Dyke Lane. This will be provided at Deadline 3.
20.11	Applicant	**Policy – national** Section 3.1 of the TA [AS-108] refers to the over-arching aims of NPSWW. However, it does not refer to NPSWW section 4.13 which relates to 'Traffic and transport impacts'. Please provide a brief addendum to the TA which: a) signposts where each relevant consideration in NPSWW section 4.13 has been dealt with in the TA; b) where considerations in NPSWW section 4.13 have not been dealt with, either deals with them in the addendum or explains why you do not consider there to be a need to deal with them; and	The Applicant will provide the addendum requested by the ExA. This will be added to the Transport Assessment Part 2 (App Doc Ref 5.4.19.3) **[AS-108b]** as an additional appendix. This will be provided at Deadline 3.

ExQ1	Question to	Question	Response
		frames the TA's conclusions in terms of compliance with NPSWW section 4.13, setting out the author's opinion on the acceptability (or other otherwise) of identified impacts.	
20.12	Applicant, CCC	**Policy – local** Para 1.3.4 of ES Chapter 19 [AS-038] says that Policy SS/4 (Cambridge Northern Fringe) of the South Cambridgeshire District Council Local Plan 2018 is relevant. It also indicates that the emerging North East Cambridge Area Action Plan 2020 and policies 16, 17, 18, 22 of the North East Cambridge Action Plan 2021 are relevant. Please explain the relevance of these to the Examination of the application for the proposed WWTP.	The Applicant refers to Policy SS/4 of the South Cambridgeshire District Council (SCDC) Local Plan, this states the designation of a re-development area, enabled by the Cambridge Northern Fringe East and Cambridge North railway station. The Proposed Development will require construction and operation to travel on the Strategic Road Network to reach the proposed WWTP as is noted in the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**. Construction and operational workers, through measures encouraging modal shift contained within the Construction Workers Travel Plan (CWTP) (App Doc Ref 5.4.19.9) **[APP-150]** and Operational Workers Travel Plan (OWTP) (App Doc Ref 5.4.19.8) **[APP-149],** will make use of sustainable transport modes to travel to the location of the proposed WWTP. These include: Construction Workers Travel Plan - the appointment of a Travel Plan Coordinator (TPC) to oversee the implementation of the Travel Plan and monitor progress. - provision of sustainable travel welcome packs which would include information on available public transport routes and services, local cycle routes, information relating to traffic-related environmental concerns, congestion problems and car sharing to raise awareness - the provision of a minimum of 40 safe secure cycle parking stands on site - the installation of adequate welfare facilities on site, including showers and lockers - promoting walking through the sustainable travel welcome packs - promote car sharing with the Travel Plan Coordinator acting as a mediator for staff interested in car sharing Operational Workers Travel Plan - the provision of 50 secure bike parking spaces - welfare facilities - safe and accessible routes to the proposed WWTP - electric vehicle charging points - additional soft measures e.g., clear signage, car sharing initiatives coordinated by the TPC - awareness raising measures Schedule 2 Part 1, Requirement 9 of the dDCO (App Doc Ref 2.1) **[AS-139]** states that no phase of the authorised development is to commence until a construction environmental management plan for that phase has been submitted to and approved by the relevant planning authority, and that a detailed CWTP must accord with the CWTP. Schedule 2 Part 1, Requirement 12 of dDCO (App Doc Ref 2.1) **[AS-139]** states that prior to the operation of the authorised development a detailed operational workers travel plan must be submitted to and approved in writing by the relevant planning authority, and that the detailed operational workers travel plan must accord with the measures set out in the operational worker travel plan. Consideration has been given to Policy SS/4 in relation to the measures within these travel plans, noting that workers could and should make use of the new transport interchange at Cambridge North railway station in order to meet the mode shift requirements outlined within the travel plans. The relocation of the existing Cambridge WWTP is proposed to support the development of the emerging North East Cambridge Area Action Plan. Policies 16, 17, 18 and 22 of the North East Cambridge (NEC) Action Plan 2021 state the requirement for more walkable neighbourhoods, to improve connectivity between NEC and other areas, improve the provision of cycle parking, and manage the volume of motorised vehicles. The Proposed WWTP gives consideration to each of these policies by: • Ensuring that existing pedestrian and cycling connections are maintained and that any new connections (such as the proposed modification to walking and cycling shared use path on Horningsea Road, which is within 10mins' cycle catchment for the NEC) complement the existing network.

ExQ1	Question to	Question	Response
			• Ensuring that sufficient cycle parking be provided at the proposed WWTP in line with policy and to encourage mode shift. • Ensuring that the construction and operation vehicle volumes can be managed through appropriate management plans to be in line with the trip budget principles such as: - the Construction Traffic Management Plan (App Doc Ref 5.4.19.7) **[AS-109]** - the Outline Operational Logistics Traffic Plan (App Doc Ref 5.4.19.10) **[AS-111]**
20.13	Applicant, SCDC, CCoC	**Policy – local** Is the Proposed Development a development with 'significant transport implications' according to Policy TI/2: Planning for Sustainable Travel of the South Cambridgeshire Local Plan 2018?	The Applicants response is as follows. In construction, the Proposed Development will generate the following vehicle trips: • A total 492 daily movements representing the peak construction vehicle flow required for the proposed WWTP. • A total 72 daily peak movements for the wastewater transfer tunnel • A total 64 daily movements for the Waterbeach pipeline. For the number of construction vehicle movements for the Waterbeach pipeline, typical construction vehicle numbers have been used instead of the peak vehicle numbers. This is because the peak represents a site set up or taken down scenario, which would not coincide with the other peak periods. Due to the peak vehicle trips (total 628 movements daily), as per Policy TI/2 of the South Cambridgeshire Local Plan, the Proposed Development should be considered to be a development with significant transport implications. In accordance with Policy TI/2, sub-policies 1, 2, 4 and 5, the Proposed Development has given consideration to these implications through: • The upgrade of the Horningsea Road / Junction 34 slip roads junction to create an improved environment for pedestrians and cyclists, including new shared use path on the eastern side of Horningsea Road, improved pedestrian crossing infrastructure. • Control of construction traffic through the Construction Traffic Management Plan (App Doc Ref 5.4.19.7) [AS-109], with specific provision for construction routes and delivery times, ensuring PRoW routes are maintained either through gates crossing points or local diversion routes. • Measures to promote sustainable travel contained within the Construction Workers Travel Plan (App Doc Ref 5.4.19.9) [APP-150] and the Operational Workers Travel Plan (App Doc Ref 5.4.19.8) [APP-149]. • Any diverted PRoW in construction will be reinstated in operation. • The provision of cycle parking at the proposed WWTP in line with the Local Plan.
20.14	CCC, SCDC, CCoC	**Policy – local** a) Is the Applicant's summary of applicable adopted and emerging local policy complete? b) Are there any other policies that should be taken into account? Should any of the policies noted by the Applicant be disregarded?	
20.15	National Highways CCoC	**Guidance – WebTAG** 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.	
20.16	CCoC	**Guidance – Cambridgeshire County Council's Transport Assessment Guidance** With reference to section 3.15 of ES Chapter 19 [AS-038], are you satisfied that the Applicant has appropriately and satisfactorily followed CCoC's guidance? If not, please set out what needs to be done to address this situation.	
20.17	CCC, SCDC, CCoC	**Strategy documents – relevance to decision** 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	

ExQ1	Question to	Question	Response
		▪ 3.12 Cambridgeshire Local Transport Plan ▪ 3.16 Greater Cambridge City Deal ▪ 3.17 Cambridge City Access It appears to the ExA that some of the documents / provisions noted by the Applicant relate to strategy rather than decision-making considerations. Which, if any, of the above documents do you consider to be Important and Relevant to the decision on this application? Please specify which part(s) of each document you consider to be Important and Relevant.	
20.18	Applicant	**Safety – Operation of Cambridge City Airport** Please provide comments on the requests of Marshalls [RR-030] for: • Involvement in the preparation of a Construction Environmental Management Plan; • a Bird Hazard Management Plan; and • if there is a need for additional aeronautical studies to be undertaken, the cost of these studies to be covered by the Applicant.	The Applicant has responded to these points as part of its response to Relevant Representations (App Doc Ref 8.2). In summary, the Applicant is happy to consult Marshalls on the further development of the Wildlife Hazard Management Plan (App Doc Ref 5.4.8.18) **[APP-103]** (referred to as the Bird Hazard Management Plan in RR-030). Consultation on construction activities which have the potential to impact upon the operation of Cambridge City Airport and the need for additional aeronautical studies will be dealt with through the process of applying for a permit from Cambridge City Airport for tall structures and cranes (see Consents and Other Permits Register (App Doc Ref 7.1) submitted at Deadline 1).
20.19	Applicant, National Highways, CCoC	**Safety – Abnormal Indivisible Loads (AIL)** 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 to the physical deliverability of the Proposed Development or whether any changes would be needed to the proposed construction traffic routes. 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. Could **National Highways and CCoC** please explain: g) whether there are any network restrictions that the Applicant should be aware of / which could pose an issue for the transportation of AIL to the work sites.	On the matter of abnormal load ES Chapter 19 (App Doc Ref 5.2.19) **[AS-038]** Para 4.2.4 states, "Construction movements which are required for […] he Applicant's response is the movement of some materials to construction areas that are classed as dangerous loads or that are classed as abnormal loads (DfT, 2022). Abnormal loads will be required for access platforms, process tanks, and pipe bridges." a) Peak monthly AILs are indicative at this stage of development, however worst case is likely to be maximum of 10-14 per month in peak construction periods at the proposed WWTP. The Applicant can confirm the AILs will be accessing the proposed WWTP site only via the A14 junction 34. The Applicant can confirm these would be managed through the CTMP (App Doc Ref 5.4.19.7) **[AS-109]** and CoCP Part A (App Doc Ref 5.4.2.1) **[APP-068]** Section 3 which requires the appointment of a Community Liaison Officer who will be responsible for stakeholder liaison which includes a construction forum and to ensure timing with other projects is checked and that required permissions and notifications are achieved prior to AILs being delivered. Schedule 2 Part 1, Requirement 9 of the dDCO (App Doc Ref 2.1) **[AS-139]** requires the measures specified within the CoCP to be contained within the relevant construction environment management plans, and for a detailed construction traffic management plan to be produced which must accord with the measures set out in the construction traffic management plant. b) During the enabling phases it is only envisaged to be mobile cranes and low loaders for excavator delivery that will travel to the proposed WWTP. All other AILs will be during the construction phase of the development These movements are expected to occur outside of peak hours. Page 144 of ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]** states that "implementation of the CTMP in particular Section 4.2 (Local routing and site plant vehicle routing) which requires abnormal loads to have specific measures including appropriate vehicle escort and marshalling where required and timing of movement to be outside peak hours (i.e., school start and finishing times). All deliveries will be made outside of peak hours (8am-9am and 3pm-4pm) unless it is determined to be essential that the delivery is to be completed during peak hours." c) These movements would travel to their destination via the Strategic Road Network, the A14, and use the slip roads at Horningsea Road. The Applicant does not expect to have to use any AIL for the Transfer Tunnel or Waterbeach Pipeline Schedule 2 Requirement 9 of the draft DCO (App Doc Ref 2.1) **[AS-038]** requires a CTMP for each phase of the development to be submitted and approved alongside the CEMP for such phase. As part of this process any updates to the CTMP would require consultation with the relevant highway authorities to confirm the permitted routes, timescale for permissions to be granted and any additional mitigation measures to ensure minimised impact on the transport network, including emergency services operational routes. d) No route testing for abnormal loads has road been carried out. The A14 as part of the Strategic Road Network and junction 34 at Horningsea Road would be designed to be suitable for all types of HGV

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			vehicle, and therefore with suitable management in place would be expected to be suitable for AILs. The Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109]**, paragraphs 4.2.5 and 6.4.1 set out that AILs will be managed on an individual basis and will be delivered out of hours if this is required. The provision in the CTMP is secured by Requirement 9 of the draft DCO (App Doc Ref 2.1) **[AS-139].** e) The Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109]**, Section 6.3 'Adherence to Designated Routes' provides details of routes to be used for journeys to and from the site. Para 6.3.2 of the CTMP makes note of the weight limits, enforced by TROs by CCoC, on: - South of the A14, Horningsea Road. Subject to an 18t weight restriction, except for access which extends 30m south from the on-slip in a southerly direction towards Fen Ditton. - North of the A14, Horningsea Road. Subject to a 7.5t weight restriction, except for access which beings approximately 30m north of the A14 off-slip extending north towards Horningsea. - The village of Waterbeach is subject to a weight restriction of 7.5t except for access which begins at the Car Dyke Road/A10 and Denny End Road/A10 junctions, both in an easterly direction towards Waterbeach village. f) Following discussions held with East of England Ambulance Service (EEAST), the Applicant notes that EEAST has requested to be kept up to date with construction, which would include the movements of AILs where required. The Applicant would inform EEAST through the construction forum, which is a requirement of the CTMP (App Doc Ref 5.4.19.7) **[AS-109]** Para 4.2.5, which notes that the delivery of AILs, where additional mitigation is required (such as marshalling and appropriate vehicle escort), would be communicated in the construction forum and local community groups before arrival. This requirement is also contained within the Community Liaison Plan (App Doc Ref 7.8) **[AS-132]**.
20.20	Applicant, Network Rail Infrastructure Limited	**Safety – railway level crossings** Would all vehicles involved in implementation of the Proposed Development (including cranes and AIL) be capable of traversing level crossings without damaging the tracks, overhead lines and any safety equipment? Would the 'hump' at the Fen Road level crossing cause any issues for long vehicles / low loaders?	The Applicant's response is the measures within Section 6.9 of the Construction Traffic Management Plan (App Doc Ref 5.4.19.7) **[AS-109]** would manage construction vehicle movements over level crossings whereby section 6.9 requires that "at the level crossings on Bannold Road and Station Road in Waterbeach, construction traffic, where necessary, should have restricted working hours, speed restrictions and the use of bank persons." Regarding the existing 'hump' at the Fen Road level crossing, the Applicant's construction team has visited the location and is satisfied that the vehicles intending to travel across the Fen Road crossing will be able to use the crossing with no difficulties in line with the measures set out in the CTMP (App Doc Ref 5.4.19.7) **[AS-109].**
20.21	Applicant	**Evidence for choice of vehicular access** On page 20 of Consultation Appendix Phase Two Consultation Summary Report dated December 2021 [APP-183] it is stated that *in addition to a traffic assessment, we have undertaken a detailed, wider appraisal assessing the options against 22 different criteria* and that *However, when considering our analysis alongside National Highways' advice that a new junction to allow access directly from the A14 would only be acceptable to them where there were no viable alternatives, Anglian Water did not consider that a need for Option 3 could be evidenced.* At para 5.1.1 and 5.1.3 of the TA [AS-108] it is noted that traffic surveys were undertaken in December 2021 and May 2022, apparently after the decision was made in relation to the site access. a) Were any traffic surveys undertaken before December 2021 to support the choice of site access? b) Please provide a copy of the 'traffic assessment' and 'detailed wider appraisal' that informed the choice of access.	The Applicant's response to the points are as follows: a) No traffic surveys were undertaken before December 2021 to support the choice of site access. A desk-based study of transport impacts was carried out at the site selection stage. b) Information on the access optioneering for the proposed WWTP can be found in the Stage 4 site selection report provided to support this Chapter (Appendix 3.4, App Doc Ref 5.4.3.4) **[APP-077].**

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20.22	Applicant	**Choice of vehicular access** On page 38 of Phase Three (Statutory Phase Two) Section 47 Community Consultation Materials [APP-185] it is stated that *After consultation with National Highways and Cambridgeshire County Council as the relevant highways authorities, and feedback from the local community and stakeholders as part of our phase two consultation last year, we selected a safe and sustainable permanent access for the project from Junction 34 of the A14.* On PDF page 545/554 of the TA [AS-108] it is stated that: *Option 3 has not been selected on account of technical issues around creating a new junction off the A14 based on feedback from National Highways.* a) Please provide copies of National Highways' and CCoC's response to the consultation on the site access. b) Please outline the evidence that was presented to them to inform their decisions. c) Please explain the technical issues relating to the creation of a new junction off the A14.	a) The responses from National Highways and CCoC have been provided by The Applicant. b) The phase two public consultation (CON 2) was undertaken during summer 2021 and closed on 18 August 2021. A consultation leaflet titled 'Phase Two Community Consultation Leaflet June 2021'. Page 23-27 of this leaflet, 'Permanent traffic and access options', presents the four access options along with the benefits and drawbacks related to traffic, biodiversity and green belt impacts, impacts on non-motorised users, land take amount, environmental impact matters. c) The option to create a new junction off the A14 (Option 3) was discounted based on feedback received from National Highways and CCoC at the second stage of consultation. This stated that allowing access directly from the A14 would be contrary to Department for Transport policy 'Strategic road network and the delivery of sustainable development, DfT, 2022', stating that Option 3 would only be acceptable where there were no viable alternatives, and a need for a new junction off the Strategic Road Network could be evidenced. Furthermore, the ES Chapter 3 (App Doc Ref 5.2.3) **[AS-018]** Para 6.1.12 states that the wider appraisal concluded there was an alternative option to Option 3 in the form of Option 1, and it was not possible to evidence a need for a new junction off the A14. Following Phase 3 consultation, The Applicant selected Option 1b (the proposed access) as the best performing option for providing access off Junction 34.
20.23	Applicant, National Highways, CCoC	**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. 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. 6.1.10 Option 1 generally out-performed options 2 and 3, providing a lower cost option which was quicker to deliver while reducing land take and minimising impacts on visual amenity and green belt. All three options were capable of being delivered without adversely affecting road safety or the capacity of the strategic road network. 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.* a) Please provide the approximate costings of the four options which informed these conclusions. b) Would there need to be peak hour movement restrictions with Option 3, whether during the construction phase or the operational phase of development? 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?	The Applicant's response to the points are as follows: a) The ES Chapter 3: Site Selection and Alternatives, (App Doc Ref 5.2.3) **[AS-018]** Section 6 'Traffic access arrangements' discusses costs of the options in terms of low, medium and high as part the site selection process. In this section it defines. Option 1 was defined as the lowest cost option, with options 2 and 3 medium and high respectively. b) This would need to be tested in the traffic models to determine the full effects. A benefit of Option 3 would relate to there being no impact on existing Junction 34, however there would likely be an effect on Junction 35 where construction and operational vehicles would be required to make a u turn, due to the egress to the site be eastbound only on the A14. c) *Question for National Highways*
20.24	Applicant	**J34 - disruption during construction** On PDF Page 23/32 of Consultation Appendix Phase Two part b [APP-182] it is stated that: *Option 1B potentially causes disruption or closure to the existing junction during construction of the new access, and requires larger volumes of material than Option 1A.* Please describe the nature and expected duration of any disruption and / or closures.	The Applicant's response is as part of the proposed access to the proposed WWTP, temporary traffic measures will be required for the construction of the permanent access. The Construction Traffic Management Plan (CTMP) (App Ref Doc 5.4.19.7) **[AS-109]** Section 6.9 'Facilitate safe movement of users of the highway including non-motorised users', para 6.9.1-6.9.5 provide details on the nature of the closures and temporary traffic management measures required on Horningsea Road for the construction of the proposed access to the proposed WWTP. These are summarised as follows: • Temporary speed restrictions to Horningsea Road will be put in place in accordance with the Traffic Regulation Order set out in Article 16 of the DCO for the duration of the works (details subject to agreement with CCoC and any other relevant stakeholders). • A requirement for short term single lane closures on Horningsea Road for specific construction activities, although these would be kept at a minimum. Lane closures would be carefully managed to avoid working

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			hours of the main site and night-time closures would be preferred and planned to minimise impact on road users. • The majority of the works would be carried out under temporary traffic management, which would maintain vehicular access on Horningsea Road under temporary signal control.
20.25	Applicant	**Pedestrian and cycle access** Para 2.7.4 of the Transport Assessment (TA) [AS-108] states that *The proposals will include a new shared-use path between Horningsea Road and the proposed site, including a new pedestrian crossing on Horningsea Road to allow pedestrians to access the proposed site from the existing shared-use path on Horningsea Road.* a) The alignment of this path has been omitted from drawings. Please provide an indication of its alignment and a calculation of its likely surface area. b) Would the path be lit? If not, how safe and usable would it be during the hours of darkness? c) Would the path be fully accessible? d) Should the path be shown on the General Arrangement Plans [AS-149], the Works Plans [AS-150], and Design Plans - Highways and Site Access [APP-025]? e) There are no pedestrian facilities shown alongside the access road to the WWTP. Does this present a risk that pedestrians coming from the south would walk along the carriageway to access the facility rather than making a more circuitous approach via the aforementioned shared-use path? Please explain the rationale for not providing a footway in this location.	The Applicant's response to the points are as follows: **a)** The new pedestrian crossing on Horningsea Road and the link to the shared pedestrian / cycle access to the proposed WWTP is shown on the Horningsea Road Highway drawing 1011 'Cambridge Waste Water Treatment Works Relocation Preliminary General Arrangement' and drawing 1181 'Cambridge Waste Water Treatment Works Relocation Preliminary Road Markings and Traffic Signs' contained within Design Plans – Highways and Site Access (App Doc Ref 4.11) **[APP-025]**. The alignment of the path from Horningsea Road to the proposed WWTP is shown on the Landscape Masterplan drawings, which can be found in Figure 3.1 LERMP (App Doc Ref 5.2.8.14) [**AS-066**]. The path is 3m wide but the Applicant notes that the alignment is not available. The alignment and length is to be provided by the Applicant at Deadline 3. **b)** The shared use path between Horningsea Road and the proposed WWTP would not be lit. The pedestrian crossing on Horningsea Road is to be lit and detailed within the Lighting Assessment Report (App Doc Ref 5.4.15.3) **[AS-100]**, Table 4-1 'Worst case lighting requirements summary'. This will require consultation with CCoC to define requirements and specification at detailed design. The Applicant wishes to note that the Lighting Assessment Report and the Lighting Design Strategy (App Doc Ref 5.4.2.5) [APP-072] state lighting is not required for the permanent access road located on Horningsea Road. Para 5.5.2 of the Lighting Strategy **[APP-072]** states: "Lighting of the proposed WWTP road network will only be applied around the roads beside the Gateway Building, HGV parking area and staff car park as illustrated by the blue dashed line around Areas 1 and 2 on the plan in appendix A. Operations staff would travel around the site after dark guided by their vehicle headlights." The access road is not included in this statement and therefore the lighting of this area is omitted. **c)** The shared pedestrian / cycle access would be fully accessible with maximum slopes of 1:20 with step-free access. **d)** The shared pedestrian / cycle access is shown on 4.11.1 'Design Plans – Highways and Site Access' (App Doc Ref 4.11) **[APP-025]** but the alignment is to be confirmed. The shared pedestrian / cycle access is not shown on the General Arrangement Plans (App Doc Ref 4.2) **[AS-149]**, the Works Plans (App Doc Ref 4.3) **[AS-150]**. The alignment and length is to be provided by the Applicant at Deadline 3. **e)** The proposed shared pedestrian / cycle access to the gateway building of the proposed WWTP provides a direct 'off road' link from the existing shared use footway / cycleway on Horningsea Road via a new pedestrian crossing on Horningsea Road to the proposed WWTP. This is intended to provide a convenient and safe route for pedestrians and cyclists to access the proposed WWTP. During design development, consideration was given to providing a link using the vehicular site access and a new pedestrian crossing at the existing Horningsea Road / off slip signalised junction. This option was not taken forward for the following reasons: • It was considered preferable to separate pedestrians and cyclists from vehicular site traffic as far as possible.

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			• Pedestrians would need to cross Horningsea Road at the signalised junction. To include a pedestrian crossing phase at this junction would require changes to the phasing of the signals which in turn had a negative effect on the operation of the signals. • Providing an 'uncontrolled' pedestrian crossing in close proximity to the existing signalised junction was not considered appropriate on highway safety grounds. • The inclusion of a footway / cycleway on the site access road increased the cross-section of the site access road which increased the amount of fill material required for the embankments. It is considered unlikely that pedestrians and cyclist would use the existing site access road as: • There is a footway / cycleway provision on the east side of Horningsea Road • There is a safe place to cross Horningsea Road in the vicinity of the signalised junction and site access road. • The pedestrian / cycle route to the site will be waymarked / signed from the Horningsea Greenway to the site. The proposals within the Proposed Development provide a direct shared pedestrian / cycling connection from the existing Horningsea Greenway, where there is good visibility for pedestrians and cyclist to cross Horningsea Road, a 'traffic free' route from Horningsea Road to the proposed WWTP and connectivity to the Low Fen Drove Way Byway.
20.26	Applicant, CCoC	**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 of future reviews of bus services.* Please provide further information as follows: a) are existing bus services suitably timed to serve workers at the site? 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?	The Applicant's response to the points are as follows: a) The Landbeach-Cambridge bus route 19 serves the settlements of Horningsea and Fen Ditton. The service runs twice in the morning and twice in the afternoon. Bus stops for this service are located in the settlements of Horningsea and Fen Ditton and workers would then need to travel to the site from these locations. A review of existing bus services serving nearby settlements has been carried out in the Traffic Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** Section 4 'Existing Networks and Baseline Transport Conditions', sub-sections 4.3 'Horningsea' and 4.4 'Fen Ditton'. b) A future review of bus services would take place as part of CCoC review of bus provisions in the areas. Applicant notes the comment in relation to bus stops and confirms it will continue to engage with the local highways team at CCC and that arrangements in relation to bus stops will be recorded within the SOCG. New bus stop infrastructure could also be discussed with CCoC by the Applicant as part of the Construction Workers Travel Plan monitoring, outlined in Section 6, and secured through dDCO (App Doc Ref 2.1) **[AS-139]** Part 3 Requirement 10 e), which grant the Applicant the powers to carry works out. c) As noted above, new bus stop infrastructure could be discussed with CCoC by the Applicant as part of the Construction Workers Travel Plan monitoring, outlined in Section 6, and secured through dDCO (App Doc Ref 2.1) **[AS-139]** Part 3 Requirement 10 e), which grant the Applicant the powers to carry this out.
20.27	Applicant	**Site access – safety** Would the site access road and pedestrian / cycle access require any safety / crash barriers, signage or lighting? If so, please provide indicative details.	The Applicant's response to the points are as follows: **Site access road and pedestrian / cycle access and safety barriers:** The signage details for the proposed access are detailed on Drawing 1181, 'Cambridge Waste Water Treatment Works Relocation Preliminary Road Markings and Traffic Signs' contained within Design Plans – Highways and Site Access (App Doc Ref 4.11) **[APP-025]**. Safety / crash barriers on Horningsea Road and the site access will be required where the carriageway is on embankment (subject to further assessment and detailed design). Requirement 7(1) of the dDCO (App Doc

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			Ref 2.1) **[AS-139]** is the mechanism for the delivery of detailed designs for the local planning authority (LPA) approval, and detailed design of safety / crash barriers would be delivered through this. **Lighting** The access road is stated as not needing lighting in the Lighting Assessment Report (App Doc Ref 5.4.15.3) **[AS-100]** and Para 5.5.2 of the Lighting Design Strategy (App Doc Ref 5.4.2.5) **[APP-072]**. The main gate and cycle shelter are stated as needing lighting in the Lighting Assessment Report, Table 4-1 'Worst case lighting requirement summary'. The lighting requirements for Horningsea Road are stated in the Lighting Assessment Report, Table 4-1 'Worst case lighting requirement summary'. The Applicant notes that there is no operational requirement for the lighting of the access road, and this has therefore been omitted in order to align with the lighting design objective indicated in the Lighting Design Strategy (App Doc Ref 5.4.2.5) **[APP-072]** which indicates that 'the installation shall be designed to avoid light pollution beyond the site boundary and upwards into the surrounding atmosphere, particularly in rural areas.
20.28	Applicant	**Site access – safety** Please provide tracking to demonstrate that a coach could safely turn right into the Visitors' Car Park having passed by the traffic island / pedestrian refuge close to the entrance to the Visitors' Car Park.	The Applicant will provide the requested swept path drawing demonstrating a coach turning right into the Visitors' Car Park. This will be provided at Deadline 3.
20.29	Applicant	**Site access – resilience** On page 52 of ES Chapter 19 [AS-038] the following is stated that *Pedestrian island crossing on Horningsea Road – This provides additional protection for pedestrians and cyclists crossing the road and ensures safe connection to shared footway. The traffic island prevents right-turns from the permanent site access road, which reduces potential conflicts at the A14 offslip Road/Horningsea Road junction.* How would vehicles leave the site in the event that a left-hand turn is not possible, whether at short notice or because of planned closure (for example if the overbridge is closed because of an accident or for roadworks)?	The Applicant's response is that in the event that Horningsea Road bridge is closed owing to an emergency, and construction would not be able to make a left turn out of from the proposed site access, construction vehicles would be held on site temporarily. This measure is outlined in Section 6.10 of the CTMP (App Doc Ref 5.4.19.7) **[AS-109]** which sets out how the Applicant will maintain regular contact with the Local Highway Authority and National Highways to monitor interaction of the construction works with the wider traffic network. This would enable implementation of short notice changes, if required, to support the management of emergency situations. These chances could involve, for example, holding construction traffic on site to avoid creating further congestion and contacting delivery companies / drivers to either reschedule the delivery for later that day or for the next day in extreme circumstances. Additionally, the CTMP Section 3, sets out how such emergencies would be communicated via the Community Liaison Officer.
20.30	Applicant	**Site access** Para 2.3.6 of the TA [AS-108] states that *The access road to the proposed WWTP site will be built prior to the main WWTP works commencing*. How would this be secured?	The Applicant's response is that no specific requirement relating to the timing of delivery of the access road, however, the Applicant considers that this is dealt with through the phasing and detailed design requirements in the dDCO (App Doc Ref 2.1) **[AS-139]**. The access road is an 'enabling work' and therefore forms part of the 'enabling phase' as defined in the dDCO (App Doc Ref 2.1) **[AS-139]**. Pursuant to Requirement 3, save for the enabling phase, the authorised development must not be commenced until the subsequent phase(s) have been approved. This is drafting so as to acknowledge that the enabling phase will come first and all other phases will be 'subsequent' to that. The phasing plan will therefore need to reflect that the access road will have been delivered under the enabling phase. Commencement of any phase is subject to detailed design approval (Requirement 7 of dDCO), which includes the approval of highway design, and requires the phase to be carried out in accordance with the approved design, means that the delivery of the access road will need to have been dealt with in the design approvals.
20.31	Applicant, CCoC	**Cycling and walking – robustness of evidence** TA [AS-108] Table 5-3 sets out pedestrian and cyclist counts in early December 2021.	The Applicant's response to the points are as follows: a) The Applicant is in agreement with the ExA; people are less likely to walk or cycle during the winter. The seasonal variation is difficult to estimate, especially when comparing winter months

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		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? 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? 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)?	count results, such as the counts completed in December 2021, to summer results. Additional surveys were completed in May 2022 in order to re-collect count data for five sites which faced technical issues in December 2021. The User Count Survey report (Appendix F of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**) includes information on the user counts observed on the PRoW network and other routes by pedestrians and cyclists. These surveys were completed in July 2022 and August 2022 and may therefore provide a more accurate view on summer months. However, it is noted that the surveyed locations differ from the pedestrian and cyclist counts completed in December 2021. b) The Applicant agrees that the number of children travelling on foot or by bicycle could have been underestimated in the 4pm counts given the school end time of 3.25pm. However, the purpose of the traffic surveys is to identify the peak transport movement periods for the assessment and junction modelling in the TA Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**. The actual movement of children and possible impacts on their movements by construction vehicles outside of these hours has been recognised by introducing the delivery hours restrictions as part of the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109]**, Section 6.5 'Delivery Scheduling'. c) Para 4.2.11 of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** refers to user count surveys which took place on PRoW in July and August 2022, coinciding with the school / summer holiday. PRoW are more likely to be used in summer for leisure and therefore the data obtained likely represents a higher-than-normal level of use by various users.
20.32	Applicant	**Cycling and walking – safety** A number of parties have expressed concern about the safety of schoolchildren using the cycle and pedestrian path alongside the B1047 Horningsea Road to travel to and from school in Fen Ditton when development is being implemented. The TA [AS-108] states that construction traffic would not travel along the construction route between the hours of 0800 and 0900 and 1500 and 1600. a. Have those hours been chosen to reflect typical times for travelling to and from school? b. Is there any usage of the cycle and pedestrian during the school's lunch period (e.g. pupils returning home for lunch)? c. Is there any flexibility for occasions when the school is opening or closing at different times? If so, how would the school communicate changes to the Applicant? d. Would all vehicle movements across the cycle path (e.g. construction workers' private vehicles which might not be considered to be 'construction traffic') be paused during these times? e. Would the cycle path be kept free of other obstacles, dirt and debris which could cause an issue for cyclists and pedestrians? f. In the event that part of all of the cycle path is temporarily unavailable during works, how would cyclists be managed along the Horningsea Road corridor? For example, would the whole of the cycle route be closed given that it is segregated from the roadway which could prevent cyclists from safely leaving and re-joining the cycle path. g. How would the measures be monitored and enforced?	The Applicant's response to the points are as follows: a) The hours of 0800-0900 and 1500-1600 have been chosen as they represent the peak hour of traffic in the AM, relating to traffic commuting or morning school runs, and the afternoon school run. These restrictions will eliminate interactions between construction vehicles (deliveries) and parents and pupils on the school run. This is set out in the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109]** and secured through the dDCO (App Doc Ref 2.1) **[AS-139]** Schedule 2, Part 1, Requirement 9. b) No data has been collected corresponding to the school lunch period on the weekday as this was not considered necessary for understanding the busiest traffic period. Pedestrian and cycle survey data has been collected for the weekday over two consecutive neutral days (industry standard practice days that are likely to show typical traffic volumes) from 0700-1000 and 1600-1900 on Saturday 1200-1500 across 13 locations. The site access points will be controlled by traffic marshals as set out in the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109],** section 3.3. c) Changes to the school's opening or closing time would be communicated to the Community Liaison Officer (CLO). The Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109]** requires that a CLO be appointed prior to the commencement of construction activities. The CLO will play a key role in ensuring that relationships and lines communication are maintained throughout the construction period. The Code of Construction Practice (CoCP) Part A (App Doc Ref 5.4.2.1) **[APP-068]** and the Community Liaison Plan (App Doc Ref 7.8) **[AS-132]** provides details on the responsibilities of the CLO, some of which are summarised below: • Promotion and development of positive relationships with local communities • Being main point of contact for stakeholders, providing briefings on construction activities, promoting the project and resolving issues of concern • Maintaining an enquiries and complaints log to be fed back to the Principal Contractor (PC) d) Owing to the core construction hours (0700am to 6pm on weekday winter months and 6am to 7pm on weekday summer months), construction workers' private vehicles would arrive prior to the 0800-0900 AM period and depart after the 1500-1600 PM period. All site entrances would be

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			controlled by site operatives to ensure the safety of footway users and that vehicles entering and exiting the sites are managed appropriately. The Principal Contractor (PC) would schedule Deliveries by Heavy Goods Vehicles so that they do not coincide with peak hours, especially during the AM and PM peak hours. This measure is secured through the CTMP (App Doc Ref 5.4.19.7) **[AS-109]**, Section 6.5 'Delivery Scheduling', Para 6.5.2. Where deliveries cannot be scheduled outside of peak hours, the PC will inform the local community through the CLO. Furthermore, Section 3.3 'Traffic Marshall(s)' of the CTMP, Para 3.3.1 requires that traffic marshals be appointed by the PC. Traffic marshals will be responsible for managing the safe movement of construction vehicles. This includes the management of pedestrian crossing points during peak hours. e) The existing footway / cycle path on Horningsea Road will be maintained at all times during construction with suitable barriers separating the path from the construction works. This measure is set out CTMP (App Doc Ref 5.4.19.7) **[AS-109]**, Section 6.9 'Facilitate safe movement of users of the highway (including non-motorised users), para 6.9.5. Compliance with the CTMP is secured by Requirement 9 within the dDCO (App Doc Ref 2.1) [AS-139]. f) Closures on Horningsea Road would be managed so that: • They are kept to a minimum; and • Take place overnight to minimise impact on road users. The existing footway / cycle path will however be maintained at all times with suitable barriers separating the path from the construction works as there is no viable alternative route for pedestrians and cyclists from Horningsea to Fen Ditton. This is stated in the CTMP (App Doc Ref 5.4.19.7) **[AS-109]**, Section 6.9 'Facilitate safe movement of users of the highway (including non-motorised users), para 6.9.5 g) Mitigation measures are identified through the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109]**. Measures within the CTMP would be monitored by a Logistics Manager, appointed by the contractor. Section 3.2 'Logistics Manager' of the CTMP summarises the responsibilities for this role, some of which include: • Monitoring and enforcing the measures outlined within the final approved of the CTMP. • Updating the CTMP during the construction period where improvements or updates are required. • Ensuring compliance with any monitoring or approval requirements in line with the requirements of the DCO. Furthermore, the Community Liaison Plan requires monitoring and recording including the maintenance of a complaints log by the CLO.
20.33	Applicant	**Construction traffic – alternatives** A number of RRs have raised concerns relating to construction-related traffic on the highway network. Bearing in mind para 4.13.10 of NPSWW (Water-borne or rail transport is preferred over road transport at all stages of the project, where cost effective…), please explain whether you have considered transporting materials and arisings by the nearby railway (e.g. via the Chesterton Railhead which is very close to the existing WWTP) or by watercourse and, if yes, why were these modes were discounted? If not, could either mode be used to reduce the number of large vehicles, particularly where safety concerns might arise due to the geometry of existing junctions? This point has not been directly addressed in the NPSWW Accordance Table [AS-130, page 79].	The Applicant confirms that these options were considered and it was concluded that they would not decrease the amount of traffic movements required to construct the Proposed Development as HGVs would still be needed to transfer the aggregate or materials from the rail siding or watercourse handling facility in order to drop off the material via the local and strategic road network. The use of rail sidings would increase the road movements along Cowley Road and Milton Road. This would also result in routing additional construction vehicle movements through Junction 33 of the A14 when compared to the current construction assumption using the A14. Additionally, watercourse drop off (on the river Cam) would have required the construction of new infrastructure to enable the offloading of materials and aggregates.

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			The earth transported by the proposed development is largely produced by digging out the shafts and tunnels, it is then reused around the site. The construction materials required to build the proposed development are either not of sufficient quantity or of a specialized nature that make transport by rail or water unsuitable. The NPSWW Accordance Table (App Doc Ref 7.5.1) has been updated and is being provided at Deadline 1.
20.34	Applicant	**Construction traffic – further information** Please provide the information requested by / a response to the following points made by National Highways in its RR [RR-016]: a) The proposal for a traffic monitoring regime to determine the timing of the phasing of implementation works requires further details in terms of its operation and application. b) Construction Traffic Routes on the SRN are not sufficiently understood, and further detail is required in respect of how they would be managed, in particular the impact on Junctions 33, 34 and 35 of the A14. c) Should the proposed construction works require the temporary closure of eastbound off slip, this can be done for short durations at night-time only. Does this present any issues for the implementation of the project?	The Applicant's response to the points are as follows: a) The requirement for the monitoring of construction traffic is secured within the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109]**, Section 7.2 'Monitoring Strategy' and Section 3.2 'Logistics Manager'. A Logistics Manager will be appointed by the Principal Contractor, and they will be responsible for monitoring traffic movements. The Logistics Manager will be responsible for the operation of a scheduling system for all deliveries and will continuously monitor delivery schedules to minimise impacts to the highway network (paragraph 7.2.2 of the CTMP). Furthermore, the CTMP has a requirement for the monitoring of vehicle routing. Paragraph 7.2.3 requires the Principal Contractor to implement a monitoring system for the movement of vehicles associated with construction, which will include: • Document pre-commencement meetings with site management teams • ANPR cameras along Horningsea Road • Active traffic management • Freight Operator Recognition Scheme (FORS) and Construction Logistics and Community Safety scheme (CLOCS) accreditation. b) Construction vehicle movements will primarily make use of the Strategic Road Network (SRN) and will travel along the SRN to get as close to possible to work sites. Where the SRN is not available, construction vehicles would then travel on local side roads to reach their destination. Construction traffic routes on the SRN were selected on the basis that it is the most appropriate road type for construction traffic. In terms of impact at junctions of the A14, the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** demonstrates that in construction in the AM and PM peak periods, there is no impact to the operation of Junction 33 and that there is an impact to the operation of Junction 34. Junction modelling of Junction 35 has not been completed as there is no traffic in construction or operation that would use it and has not been assessed in the Transport Assessment. The ES Chapter 19 [App Doc Ref 5.2.19) [AS-038], Section 1.5 'Consultation' outlines a meeting held on the 27 January 2022 between The Applicant, CCoC, National Highways and Greater Cambridge Shared Planning to discuss the commitment for construction traffic to avoid travelling through the settlements of Horningsea and Fen Ditton is a requirement. This requirement is recognised in section 6.7 of the CoCP (App Doc Ref 5.4.2.1) [APP-068]. Additionally, High Ditch Road will not be used as an access point as shown in the Access and Traffic Regulations plans (App Doc Ref 4.7) **[AS-154]**. On that basis, Junction 35 will not be used and has not been modelled. The Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109]** would however mitigate traffic effects associated with construction through the requirement for delivery scheduling outside of peak hours to minimise the impacts on the road network (see CTMP, Section 6.5 'Delivery Scheduling, Paragraph 6.5.2). c) The proposed construction works will not require the closure of the eastbound A14 off-slip at Junction 34.

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20.35	Applicant	**Construction traffic routes** Please explain why the 'Article 17 (Traffic Regulation, Part 1 - Temporary)' restriction shown on Sheet 9 of the Access & Traffic Regulation Order Plans [AS-154] between Point Q and Point T33 is proposed – this appears to extend beyond the construction route illustrated on page 185/554 of the TA [AS-108]. Similarly, please explain why the proposed temporary restrictions between Point W and Point Y on Sheet 10 of the Access & Traffic Regulation Order Plans [AS-154] extend beyond the construction route illustrated on page 185/554 of the TA [AS-108].	The Applicant notes the ExA comment on the drawings on Sheet 9 and Sheet 10 of the Access & Traffic Regulation Order Plans [AS-154] and confirms that the restriction extends beyond the construction route. These will be updated by the Applicant to bring in line with construction and will be provided at Deadline 3.
20.36	Applicant	**Construction traffic routes** The construction route illustrated on the drawing on page 185/554 of the TA [AS-108] does not include the westbound off-slip or eastbound on-slip of J33. If these do not form part of the route, how would construction traffic travelling east from the proposed WWTP access the A14?	The Applicant has identified a correction to Appendix A, Figure A.2 'Construction Access' of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** as it does not show how vehicles coming from the east on the A14 past Junction 34 would access the Proposed WWTP. The construction route should show that those travelling from the east would travel in a westerly direction along the A14, exiting at Junction 33 via the westbound off-slip, travelling around the roundabout, and rejoining the A14 eastbound via the eastbound on-slip then exiting the A14 at Junction 34 via the eastbound off-slip. The construction route shown in Drawing A.2 'Construction Access' should therefore include the westbound off-slip, the Junction 33 roundabout, and the eastbound on-slip. The drawing will be updated by the Applicant and will be provided at Deadline 3.
20.37	Applicant	**Construction traffic routes – safety** At Appendix G of the TA [AS-108] there are swept path analyses of the J34 on-slip. Please provide: a) a swept path analysis for the off-slip junction with the A14 overbridge, including for tipper trucks; and b) commentary on whether construction vehicles would be able to safely turn left or right from the J34 off-slip in the event that southbound queuing to the J34 on-slip extends close to or beyond (to the north of) the junction of the J34 off-slip and the A14 overbridge (for example when concrete pouring / directional drilling works take place during the peak periods).	The Applicant confirms that further swept path drawings analysis will be completed and that these will be provide at Deadline 3.
20.38	CCoC	**Construction traffic routes – safety** With reference to the swept path analyses at Appendix G of the TA [AS-108]: a) Are there any other junctions or access points that should be analysed? 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. 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])? d) Would a condition survey need to be carried out before works take place to ensure that any works-related damage can be identified?	The Applicant's response to the points are as follows: a) The swept path drawings provided in the Transport Assessment Part 2 (App Doc Ref 5.4.19.3) **[AS-108b]** show locations where the Applicant has noted that access could be potentially challenging due to restrictive space. The Applicant notes that the ExA has requested for additional swept path drawings to be produced and provided in question 20.37. The Applicant will produce this for Deadline 3. b) An access/egress issue relating to an overrun kerb or restrictive width would be mitigated by measures set out within the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109]**. Section 3.3 within the CTMP sets out a requirement for traffic marshals to be appointed by the Principal Contractor to manage the safe movements of construction vehicles into and out of the access points where appropriate. This measure means that no two construction vehicles would access and egress the access points at the same time. c) The Applicant confirms that this would be managed by the provisions at Para 6.8.1 of the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109]** which states where temporary alterations are required, the highway will be restored to the same condition as before the works took place or to a standard which is acceptable to CCC as the Local Highways Authority. d) Highway conditions surveys would take place before and after constructions works and will be agreed with CCoC as required. This requirement is set out within Paragraph 6.8.1 within the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109]**.
20.39	The Applicant,	**Construction traffic – alternatives** ***Applicant please respond to all parts; other parties please respond to all parts except a) and c)***	The Applicant's response to the points are as follows: a) commitment was made in Phase 2 Consultation (CON 2) to prohibit the movement of HGV traffic through the settlements of Horningsea and Fen Ditton. This requirement is recognised in the

ExQ1	Question to	Question	Response
	CCoC, SCDC, Waterbeach Parish Council, Horningsea Parish Council	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? e) Has an option been looked at where construction traffic is split between Waterbeach and Horningsea? If not, why not? 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])? g) Is CCoC satisfied that suitable mitigation has been proposed for Denny End Road and Bannold Road in response to the issue raised by respondents (see page 54 of Applicant Regard to Section 47 Consultation Responses [APP-166])? 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])?	Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109]** and The Code of Construction Practice (CoCP) Part A (App Doc Ref 5.4.2.1) **[APP-068]**. The CTMP (App Doc Ref 5.4.19.7) **[AS-109]**, Section 4 'Access and Route Strategy' provides details on vehicle routing and Section 6.3 'Adherence to Designated Routes' outlines the measures in place for adherence to designated routes. b) The Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** Section 4 'Existing Networks and Baseline Transport Conditions', sub-section 4.2 'Waterbeach' provides an analysis of personal injury collisions (PIC) in Waterbeach from November 2016 to November 2021. Appendix A, Figure A.12 of the Transport Assessment shows a map of PIC in and around Waterbeach, as well as Clayhithe Road. Results of the PIC analysis shows that in the five year period there has been: • A total 21 slight collisions were recorded in the vicinity of Waterbeach, of which 11 were recorded within the settlement itself. No pattern could be observed for their occurrence. • A total of nine serious collisions were recorded in the vicinity of Waterbeach, of which two occurred in Waterbeach itself. • Two fatal collisions were recorded on the section of the A10 between Denny End Road and Car Dyke Road. c) As stated in ES Chapter 10 (App Doc Ref 5.2.10) [APP-042], Table 2-3, to estimate carbon emissions from the transport of materials, reasonable transport distances were agreed with the Applicant. These distances were based on typical procurement practices and supplier locations (for example concrete is typically sourced from within 50km of a site). Given this approach of using approximate transport distances, changing the local route would not impact the carbon assessment. d) Transport during construction has a minor impact on the overall whole life carbon footprint of the Proposed Development, therefore additional or reduced mileage should not significantly influence the overall carbon assessment. Additional mileage of construction plant has already been accounted for within the ES Chapter 10: Carbon (App Doc Ref 5.2.10) [APP-042] summarised in Table 4-1, these account for typical transport distances of materials and products from typical industry suppliers. Therefore, the scale of these emissions has already been accounted for within the increased construction emissions associated with the Proposed Development. There could be positive benefits through a reduction in transport distances for products/materials and also through the decarbonisation of transport methods, however, the Applicant cannot commit that these will be possible through its supply chain. Based on the carbon assessment transport emissions account for between 1-10% of product/material emissions and are estimated to be in the region of 2-5% of overall project level emissions. e) A commitment was made in Phase 2 Consultation (CON 2) to prohibit the movement of HGV traffic through the settlements of Horningsea and Fen Ditton. This requirement is recognised in the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109]** and The Code of Construction Practice (CoCP) Part A (App Doc Ref 5.4.2.1) **[APP-068]**. The CTMP **[AS-109]**, Section 4 'Access and Route Strategy' provides details on vehicle routing and Section 6.3 'Adherence to Designated Routes' outlines the measures in place for the adherence to designated routes. Furthermore, the CTMP (App Doc Ref 5.4.19.7) **[AS-109]** Paragraph 6.9.10 states the commitment to avoid routing HGV movements through Waterbeach during school drop-off and pick-up hours during term time. f) The Applicant took part of a Traffic Working Group (TWG) meeting on the 27 May 2021, held with CCoC and National Highways to discuss construction route options. CCoC noted at the meeting that the monitoring and enforcement of the construction routes would be a sensitive issue especially with regards to construction traffic at Waterbeach. The ES Chapter 19 (App Doc Ref 5.2.19) **[AS-038]**, Table 1-4 outlines the matters discussed at TWGs between the Applicant and

ExQ1	Question to	Question	Response
			consultees. The Applicant has produced swept path drawings for the Hartridge's Lane / Clayhithe Road junction, available at Appendix G of the Transport Assessment Part 2 (App Doc Ref 5.4.19.3) **[AS-108b]** (drawing 102375-MMD-01-XX-DR-C-DRAFT) and shows a red boundary which represents the land that would be potentially required for the access of construction traffic. Additionally, the dDCO (App Doc Ref 2.1) **[AS-139]** Part 3 Requirement 10 grants the Applicant the powers to carry out street works on streets listed in Schedule 3 'Streets subjects to street works', which includes Hartridge's Lane. g) Applicant took part of a Traffic Working Group (TWG) meeting on the 27 May 2021, held with CCoC and National Highways to discuss construction route options. CCoC noted at the meeting that the monitoring and enforcement of the construction routes would be a sensitive issue especially with regards to construction traffic at Waterbeach. However, no issue was raised specific to Bannold Road and Long Drove. The Applicant has responded to local residents to confirm Long Drove would remain open to residents to pass throughout the work, as would Bannold Drove. The Applicant has produced swept path drawings for Bannold Road (drawing title 'temporary access junction COA14') and Long Drove (drawing title 'temporary access junction CA29'), available at Appendix G of the Transport Assessment Part 2 (App Doc Ref 5.4.19.3) **[AS-108b]** which show that there would be no accessing the works site on Bannold Road and Long Drove but that there are restrictive road widths. Additionally, the dDCO (App Doc Ref 2.1) **[AS-139]** Part 3 Requirement 10 grants the Applicant the powers to carry out street works on streets listed in Schedule 3 'Streets subjects to street works', which includes Bannold Road and Long Drove. h) The Applicant refers to para 6.9.11 of the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109]**, which outlines required measures intended to manage construction vehicle movements at level crossings on Bannold Road and Station Road. These measures are: • restricted working hours, • speed restrictions and • the use of banks persons.
20.40	Applicant	**Junction modelling – clarification** Whilst para 2.3.1 of the TA [AS-108] states that construction and associated decommissioning works are projected to start in 2024 and end in 2028, para 9.5.52 refers to construction traffic and related mitigation measures in 2038. Which construction traffic has been taken into account in the 2038 modelling?	The Applicant notes that the ES Chapter 19 (App Doc Ref 5.2.19) **[AS-038]** states that construction of 2 additional tanks would not result in new or worse impacts. The Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** modelled a 2038 scenario with full build out of the WWTP, including the additional tanks and associated traffic operational movements. The Applicant recognises that the text in paragraph 9.5.52 of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** should read *'Table 9-15 compares the traffic volume with operation outside of the peak and during the peak hours for 2038'*.
20.41	Applicant	**Junction modelling – clarification** TA [AS-108] para 7.1.6 states: *For construction the peak is in Year 3 (assumed to be 2026), with a peak 630 movements required on Horningsea Road and the A14 off-slip and on-slip.* Over what time period would the 630 movements be made?	The Applicant notes that the 630 movements stated in paragraph 7.1.6 of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** are referring to peak daily movements, based on a reasonable worst-case scenario. The breakdown of these movements across all structures of the Proposed Development is set out in paragraph 7.1.7 and Table 7-4 shows the daily construction movements as occurring from 6am to 7pm.
20.42	Applicant	**Junction modelling – clarification** The headings of Table 9-8 in the TA [AS-108] are: • Year 4 Construction (2028) Without decommissioning • Year 3 (2026) Construction Traffic Only • Year 5 Construction (2028) With decommissioning a) Why is 2028 labelled as both Year 4 and Year 5? Why is construction traffic data provided for 2026 and not for 2028?	The Applicant recognises that the headings on Table 9-8 of the Transport Assessment Part 1 (Doc 5.4.19.3) **[AS-108a]** are incorrectly labelled. They should instead read as follows: • *Year 5 Construction (2028) Without Decommissioning* (instead of Year 4 Construction (2028) Without decommissioning) • *Year 5 Construction (2028) Decommissioning Traffic Only* (instead of Year 3 (2026) Construction Traffic Only • *Year 5 Construction (2028) With Added Decommissioning Traffic* (instead of Year 5 Construction (2028) With decommissioning a) '2028' within Table 9-8 and Table 9-9 should be labelled as *'Year 5'*.

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			b) The 'Construction Traffic' data in Table 9-8 is for 2028 decommissioning but is labelled incorrectly. The Applicant will revise the table headings in line with what is noted above.
20.43	Applicant	**Junction modelling – clarification** Please clarify where the following information can be found in the TA [AS-108]: a) the size of the construction workforce; b) the expected modes for travel to and from work; c) where workers' private vehicles would be parked; and d) the hours within which workers' movements have been modelled (para 9.3.3: states that: *Worker mobilisation has been modelled to take place in the peak hours.*).	The Applicant's response to the points are as follows: a) Construction and construction worker vehicle movements are included in the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**. Paragraph 6.2.1 of the Construction Workers Travel Plan (App Doc Ref 5.4.19.9) **[APP-150]** states that during construction, 300 people, on average, are likely to be on site at the proposed WWTP per day. During the peak stage of construction (Q4 2026 to Q1 2027), this will rise to 422 people on site per day. This includes a maximum of 80 visitors on-site per day. b) The expected modes of travel to and from the workplace are set out in Section 6.2 of the Construction Workers Travel Plan (CWTP) (App Doc Ref 5.4.19.9) **[APP-150]**, Table 6-1 'Construction Worker target mode split'. c) Workers private parking will be located at the construction compound for the proposed WWTP. Information on workers parking is set out in Section 4.3 of the CWTP (App Doc Ref 5.4.19.9) **[APP-150].** d) The peak hours for worker mobilisation, as part of the realistic worst case, are 08:00-09:00 for the AM peak and 17:00-18:00 for the PM peak. Worker movements have been modelled for the AM peak and PM peak, as well as one hour before the AM and PM peak periods (07:00-08:00 and 16:00-17:00) specifically for the proposed access to the proposed WWTP to represent mitigation measures available to the Applicant as part of the Construction Traffic Management Plan (App Doc Ref 5.4.19.7) **[AS-109],** Section 6.
20.44	Applicant	**Junction modelling – clarification** Para 6.9.3 and 6.9.5 of the CTMP [AS-109] refer to speed restrictions and temporary traffic lights on Horningsea Road. Have these been taken into account in the modelling of construction phase impacts on the A14 / Horningsea Road junction?	The Applicant's would direct towards paragraph 6.9.4 of the Construction Traffic Management Plan (App Doc Ref 5.4.19.7) **[AS-109],** this states that Temporary Traffic Management will be required during construction of the permanent access to the proposed WWTP. As stated in paragraph 9.5.7 of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**, the permanent access is assumed to be completed by the 2026 baseline. The temporary traffic lights and speed restrictions are part of the Temporary Traffic Management package during the construction of the permanent access, and therefore have not been included in the RWCS Year 3 (2026) construction scenario. The RWCS Year 3 (2026) construction scenario accounts for the period of peak construction vehicle movements, which will be after the completion of the permanent access. Any additional lane closures following the completion of the permanent access will be kept to a minimum.
20.45	Applicant	**Junction modelling – baseline** With reference to section 9 of the TA [AS-108], has operational traffic associated with the existing WWTP been removed from the baseline for the assessment of the effects of the operation of the proposed WWTP?	The Applicant can state that the operational traffic associated with the existing Cambridge WWTP has not been removed from the baseline for the assessment of the effects of the operation of the proposed WWTP. This is because the junction modelling has tested the reasonable worst case scenario where all elements of the Proposed Development would be constructed at the same time and all associated construction vehicle movements would be present on the road network in the same time period. While in practice construction of the different elements of the proposed WWTP would not take place at the same time, the TA and the junction models test a scenario where an overlap occurs. The traffic associated with the operation of the existing Cambridge WWTP has therefore not been removed from the baseline of the junction models to reflect this modelling of the reasonable worst case scenario.
20.46	Applicant	**Trip generation – construction phase assumptions** Para 4.2.16 of ES Chapter 19 [AS-038] states: *It is estimated that the Proposed Development could generate up to 1,312m^3 of hazardous waste throughout the entire duration of the programme (based on Chapter 15: Material resources and waste).* 'Material Resources and Waste' is discussed in ES Chapter 16. Here the Applicant estimates that there could be 1,950 m^3 (para 4.2.23) and 330m^3 (para 4.2.42) of hazardous waste, a total of 2,280m^3. a) Please explain the difference in the figures. b) If 1,312m^3 is an incorrect figure, would a revised figure change the magnitude of the effect that is stated at para 4.2.19 of ES Chapter 19?	The Applicant's response to the points are as follows: a) The Applicant notes that the quantity of hazardous wastes shown at ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]** is incorrect and should be 2,280m^3 in line with Chapter ES Chapter 16 [APP-048]. The statement at Para 4.2.16 of ES Chapter 19 should be corrected to: "It is estimated that the Proposed Development could generate up to 2,280m^3 of hazardous waste throughout the entire duration of the programme". b) Hazardous loads have been reassessed by the Applicant with the correct figure of 2,280m^3 and shows that there is a change in the magnitude of effect that is stated at paragraph 4.2.19 of ES Chapter 19 **[AS-038].** The reworked percentage of HGVs required to deliver hazardous loads is of

<table>
<tr><th>ExQ1</th><th>Question to</th><th>Question</th><th>Response</th></tr>
<tr><td></td><td></td><td></td><td>minor magnitude of impact, compared to the previous neutral magnitude of impact. The sensitivity of receptors remains the same. The Applicant notes that the significance of effect has therefore changed from being slight and not significant to moderate and significant. The Applicant has updated the assessment of hazardous loads in ES Chapter 19, Para 4.2.16, 4.2.17, 4.2.19, 4.2.23 and Table 4-6 to reflect this. The Applicant has also updated the assessment of hazardous loads to reflect new IEMA guidance for traffic and transport published in 2023. Measures within the CTMP (App Doc Ref 5.4.19.7) [AS-109] would manage and control the movement of hazardous loads: notably section 6.5 ‘Delivery Scheduling’ would require all deliveries to be made outside of peak periods.</td></tr>
<tr><td>20.47</td><td>Applicant</td><td>Trip generation – construction phase assumptions
a) Please clarify how the movements at para 4.2.30 of ES Chapter 19 [AS-038] add up to a total of 70 movements;
b) Please explain whether the “10 worker and staff movements for both hours” means five or ten movements in each of the hours.</td><td>The Applicant’s response to the points are as follows:
a) The total 70 movements have been calculated as follows (discrepancies may occur due to rounding errors):
<table>
<tr><th></th><th>HGV movements</th><th>Worker and staff movements</th></tr>
<tr><td>7-8am</td><td>5</td><td>10</td></tr>
<tr><td>8-9am (peak AM no construction traffic)</td><td></td><td></td></tr>
<tr><td>9-10am</td><td>5</td><td>1</td></tr>
<tr><td>10-11am</td><td>5</td><td>1</td></tr>
<tr><td>11am - 12pm</td><td>5</td><td>1</td></tr>
<tr><td>12 - 1pm</td><td>5</td><td>1</td></tr>
<tr><td>1 -2pm</td><td>5</td><td>1</td></tr>
<tr><td>2 -3pm</td><td>5</td><td>1</td></tr>
<tr><td>3 - 4pm (school peak no construction traffic)</td><td></td><td></td></tr>
<tr><td>4 - 5pm</td><td>5</td><td>1</td></tr>
<tr><td>5 - 6pm (PM peak no construction traffic)</td><td></td><td></td></tr>
<tr><td>6-7pm</td><td>5</td><td>10</td></tr>
</table>
This equals to 72 movements but due to rounding errors, has been rounded down to 70.

b) “10 worker and staff movements for both hours” equates to 10 movements in each of the hours i.e., 10 movements for 0700-0800am and 10 movements for 0600-0700pm.</td></tr>
<tr><td>20.48</td><td>Applicant, National Highways, CCoC</td><td>Trip generation – construction phase assumptions
At para 3.10.3 of ES Chapter 2 [APP-034] it is stated that The source of materials does not affect the transport assessment, given that the strategic highway network has the capacity to accommodate these flows. It is desirable to seek local sourcing where possible to reduce vehicle miles, total emissions and transport costs, but this is subsidiary to the need to deliver materials of an appropriate quality and longevity.
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?</td><td>The Applicant can respond that the origin of materials and their deliveries would not have any traffic impacts based on the direction of travel generally on the strategic road network. The Applicant recognises that it is likely to have effects on the junctions local to the Proposed Development, as is noted by the ExA.

If there is a change in the directional split (e.g., if the 10% of deliveries coming from the east increases), the number of vehicles travelling through Junction 33 from the east would change. Measures within the Construction Traffic Management Plan (App Doc Ref 5.4.19.7) [AS-109] include controlling the arrival and departure times of construction vehicles to minimise the impacts of changes to routing patterns on the local highway and junctions and effects on the capacity of the highway network. If a change in the directional change were to occur, these measures would continue to control vehicle movements and therefore no new measures would be proposed.</td></tr>
<tr><td>20.49</td><td>Applicant, National Highways, CCoC</td><td>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.</td><td>a) ES Chapter 16 Material Resources and Waste (App Doc Ref. 5.2.16) [APP-048] paragraph 2.9.3 states that the EIA has not assessed the impact of material resource use and waste associated with the manufactured goods required by the Proposed Development as these will be subject to their own separate consenting and regulatory controls at the place of production. The study area for the</td></tr>
</table>

<table>
<tr><th>ExQ1</th><th>Question to</th><th>Question</th><th>Response</th></tr>
<tr><td></td><td></td><td>a) A) Para 2.3.4 of ES Chapter 16: ‘Material resources and waste’ [APP-048] states that the study area for the sources and availability of construction materials would be the Cambridgeshire and, where necessary, the East of England region. However, the drawing on page 259/554 of the TA [AS-108] indicates that most materials would not be from Cambridgeshire or the East of England. Should the 10% / 90% assumption should be adjusted in light of what is stated in ES Chapter 16?
b) Has a sensitivity test of the east-west split been carried out?
c) Do the highways authorities agree with the ‘10% from the east ! 90% from the west’ split or do they require additional modelling?
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?</td><td>sources and availability of primary, secondary, and recycled construction materials (aggregates) will be Cambridgeshire, within East of England and UK for all other construction materials. The 90 / 10 assumption would therefore still be relevant and would include the sourcing of raw construction materials as well as the remaining required construction materials.

b) No sensitivity test of the east-west split has been carried out. The Applicant acknowledges the ExA’s point about sensitivity and is going to conduct a sensitivity test for the east-west split for Junction 33. This work will be discussed with the CCoC and NH and submitted as part of Deadline 3.
c) A Traffic Working Group meeting was held on 13 April 2021 where the 90-10 was questioned by CCoC. The Applicant has provided explanations for the 90-10 split, with the split being based on the location of nearby sources of construction material. The Applicant has provided detail on potential material sources. The Applicant has provided meeting minutes for the 13 April 2021 TWG meeting.
d) The results of the current junction models for Junction 33 show that in construction in the peak hour the junction operates within capacity (under 100% Degree of Saturation). These results are based on the 10% / 90% split and the construction flows have been adjusted accordingly. If an increase / change in the directional split (e.g., 10% / 90% to 50% / 50%), it is expected that the operation of Junction 33 would worsen (or increase in terms of degrees of saturation). The sensitivity testing at Junction 33, which the Applicant is going to conduct as part of deadline 3, will help understand this. However, it is noted that any traffic impacts in construction in the peak hour would be mitigated by the Construction Traffic Management Plan (App Doc Ref 5.4.19.7) [AS-109] requirement to restrict delivery scheduling in the AM and PM peak hours. The operation of J34 with a new distributional split would not change as vehicles would only be able to access the proposed WWTP from the A14 via the J34 off slip.</td></tr>
<tr><td>20.50</td><td>Applicant, National Highways, CCoC</td><td>Trip generation – workforce movements
In its RR Suffolk County Council [RR-005] has made the following observations:
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.</td><td>The Applicant has carried out testing of the workforce and deliveries in both the peak and off peak periods as part of the transport assessments of the impacts of the Proposed Development. The findings of these assessments indicate that there is sufficient road network capacity to allow for movements to occur with suitable measures in place. The measures are as set out in the Construction Traffic Management Plan (App Doc Ref 5.4.19.7) [AS-109], Section 6. The key measure in the CTMP, Section 3.4, is to appoint a Community Liaison Officer who will play a key role in ensuring that relationships and lines of communication are maintained throughout the construction period, and through a Construction Forum, to allow the organisations that are building projects at the same time as the Proposed Development to discuss and agree with the highway authorities, the most appropriate methods of mitigation that reflect the requirements of the projects prior to works being carried out. The impact of the development was discussed with National Highways and CoCC as part of the TWGs and this was not raised as an issue.</td></tr>
<tr><td>20.51</td><td>Applicant</td><td>Trip generation – time-critical activities
a) In relation to Table 4-28 of ES Chapter 19 [AS-038], why are A14 eastbound and A14 westbound flows and flows on the J34 slip roads the same in AM and PM peaks? If vehicles arrive in the AM and depart in the PM, would flows be reversed?
b) The AM and PM peak flows total 132 movements which is the same as the total number of vehicles per day as set out in Table 4-26. Does this mean that all movements would take place during the two peak hours?
c) With reference to Table 4-26 of ES Chapter 19, why is the delivery of pre-cast concrete units for tank walls and the movement of imported stone for site infrastructure and temporary working platforms considered to be ‘time critical’ such that it must occur during peak hours?
d) With reference to Table 4-26 of ES Chapter 19, how long is ‘short term’?</td><td>The Applicant’s response to the points are as follows:
a) In Table 4-28 of the ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) [AS-038], the movements should be shown as:
<table><tr><th></th><th colspan="2">Absolute change</th></tr><tr><td></td><td>0800-0900</td><td>1700-1800</td></tr><tr><td>J34 on-slip</td><td>0</td><td>132</td></tr><tr><td>J34 off-slip</td><td>132</td><td>0</td></tr><tr><td>A14 eastbound, J34</td><td>132</td><td>0</td></tr><tr><td>A14 westbound, J34</td><td>0</td><td>132</td></tr></table>
The Applicant will update the ES Chapter 19 (App Doc Ref 5.2.19) [AS-038].</td></tr>
</table>

ExQ1	Question to	Question	Response
			b) The 132 vehicle movements would be required in the two peak hours for short-term time critical activities (e.g., concrete pours). In the AM peak period, deliveries associated with short-term time critical activities would be made to the proposed WWTP. In the PM peak period, the vehicles used to complete deliveries would then leave the site. c) These materials would require immediate delivery. In relation to concrete, this would be all be brought to site as the maximum design scenario, contained within ES Chapter 16 Material Resources and Waste (App Doc Ref 5.4.16.1) **[APP-048]**, assumes there is no on-site batching plant. In relation to pre-cast concrete units, these have been qualified as time critical / requiring short term delivery due to sequencing. For example, the primary settlement tanks (PST), the deliveries of pre-cast concrete units will need to be brought in first to complete the installation. In relation to imported stone / aggregates, these are time critical as they will be required for temporary works, crane pads, bases, etc. d) The short term intermittent activities in Table 4-26 of ES Chapter 19 (App Doc Ref 5.2.19) **[AS-038]** have been estimated to take approximately six months total, and are not expected to take place simultaneously, as per Para 4.2.100 of the ES Chapter 19.
20.52	Applicant	**Horningsea road – disruption during construction** Para 4.2.135 of ES Chapter 19 [AS-038] states: *The programme has been designed to sequence construction of the proposed WWTP access road construction at the start of the programme so that it can be used in construction to reduce the duration of use of Horningsea Road and Low Fen Drove Way in construction.* a) Do the figures presented in Table 4-40 represent the situation when the proposed WWTP access road is being used for construction? b) Would the impact be lesser or greater in the period before the access road has been opened for use by construction traffic?	a) The Applicant confirms that these figures represent the situation when the permanent access to the proposed WWTP is used for construction access. b) The impact of construction traffic in the period before the completion of the permanent access road has not been assessed in the Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]** or Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**. The ES and TA have assessed the peak of construction traffic and its impact, which would take place after the completion of the permanent access. Setting up the access road occurs towards the beginning of the project where the construction flows are lower, see section 7, Figure 7-1, Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** so impacts would not be greater than the reasonable worst case that has been assessed.
20.53	Applicant, CCoC, National Highways	**Junction modelling – short-term exceptional movements** Para 9.5.22 the TA [AS-108] indicates that when construction activities would take place in the AM and PM peak hours, queue lengths would be over the maximum queue length limit and that 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. 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? c) Would the capacity constraints during peak hours simply prevent the required *constant movement* of construction vehicles referred 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.	The Applicant's response to the points are as follows: a) The Applicant refers to paragraph 9.5.23 of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**, whereby the modelling outputs in Table 9-5 represent the reasonable worst-case scenario which assumes that the construction of all elements of the Proposed Development (proposed WWTP, outfall and FE and Storm pipeline, Transfer tunnel, and Waterbeach Pipeline) would occur simultaneously and in the AM and PM peak periods. This is unlikely to occur, as the restricting construction vehicle movements outside of peak hours (as set out within the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.8) **[AS-109]** and Code of Construction Practice Part A and Part B (CoCP) (App Doc Ref 5.4.2.1 and 5.4.2.2) **[APP-068 and AS-161]** will reduce the impact on the junction so that impacts are not significant. This is set out in the ES Chapter 19, Table 9-6. Therefore, the queue shown is unlikely to occur in practice owing to the implementation of the mitigation measures to restrict the timing of construction movements to avoid coinciding with peak times. b) If the queue extended beyond the site access (from the on-slip junction), construction vehicles would be prevented from travelling north via Horningsea village to avoid the queue due the following measures. The design of the permanent access and the access junction, shown in Design Plans – Highways and Site Access (App Doc Ref 4.11) **[APP-025]**, Drawing '4.11.1 Design plans – highways (Sheet 1) Horningsea Road & Proposed WWTP access layout plan regulation 5(2)(o)', proposes a traffic island to prevent vehicles making right-turns from the permanent access road on to Horningsea Road. Additionally, a commitment was made in Phase 2 Consultation (CON 2) to prohibit the movement of HGV traffic through the settlements of Horningsea and Fen Ditton. This requirement is recognised in the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.8) **[AS-109]** and CoCP Part A **[APP-068]**. The CTMP **[AS-109]**, Section 4 'Access and Route Strategy' which provides details on vehicle routing controls and Section 6.3 'Adherence to Designated Routes' which outlines the measures in place for the adherence to designated routes

ExQ1	Question to	Question	Response
			and the implementation of temporary or permanent Automatic Number Plate Recognition (ANPR) cameras, including ANPR cameras on Horningsea Road located immediately north and south of the A14 signalised junctions. c) The Applicant confirms that this could have an impact on the implementation of concrete pours and drillings, however this would be mitigated by measures contained within the CTMP (App Doc Ref 5.4.19.7) **[AS-109]**. Some short term intermittent activities, which includes concrete pours, would however be affected by capacity issues in the peak hour. As part of the construction programme movement during peak hours for the uninterruptible activities would be minimized as far as possible to avoid such issues. The Applicant can confirm these would be managed through the CTMP (App Doc Ref 5.4.19.7) [**AS-109**] and CoCP Part A (App Doc Ref 5.4.2.1) [**APP-068**] Section 3 which requires the appointment of a Community Liaison Officer who will be responsible for stakeholder liaison which includes setting up a construction forum with other nearby developers to help coordinate communication regarding developments in the local area and making sure that timing with other developments is checked to avoid concurrent activity. Outcomes from the construction forum would be communicated to National Highways and CCoC as the appropriate highway authorities . d) In the event that Horningsea Road bridge is closed owing to an emergency, and construction would not be able to make a left turn out of from the proposed site access, construction vehicles would be held on site temporarily. This measure is outlined in Section 6.10 of the CTMP (App Doc Ref 5.4.19.7) [**AS-109**] which sets out how the Applicant will maintain regular contact with the CCoC and National Highways to monitor interaction of the construction works with the wider traffic network. This would enable implementation of short notice changes, if required, to support the management of emergency situations. As set out in the CTMP (App Doc Ref 5.4.19.7) [**AS-109**] Section 3, such emergencies would be communicated via the Community Liaison Officer.
20.54	Applicant, CcoC	**Junction modelling – traffic from multiple work sites** 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 explain where this information is set out in the ES.	The Applicant responds that the ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]**, Section 4, paragraph 4.1.3 states that "the hourly construction flows (based on the daily maximum flows over an 8-hour working day) for each of the individual elements of the Proposed Development (proposed WWTP, the outfall and final effluent pipeline, the waste water transfer tunnel and Waterbeach pipeline) have been determined and added together on the worst case assumption that they occur at the same time." Paragraph 4.1.6 of ES Chapter 19 (App Doc Ref 5.2.19) **[AS-038]** states that the for the purpose of the ES' assessment, "each road link affected by the construction of the Proposed Development is assessed by the total peak hour(s) vehicle flow required during the construction (2026), and decommissioning phases."
20.55	Applicant	**Junction modelling – construction phase 'reasonable worst-case scenario'** Para 4.2.30 of ES Chapter 19 [AS-038] states that *The total peak 70 daily construction movements required for the construction of the waste water transfer tunnel, have been divided across an 8-hour working day to obtain hourly movement rates.* a) Have the 70 movements been divided equally across the eight hours so that 8.75 movements in each hour have been tested? b) If yes, is this realistic? For example, while works would be carried out between 15:00 and 18:00 it would not be possible for construction traffic to arrive or depart for two hours during that period. Could the pauses in construction traffic result in peaks in construction traffic movements before (e.g. to deliver additional materials to be used during the moratorium) or after (e.g. to take away waste / arisings that has accumulated during the moratorium) each pause?	a) The Applicant confirms that the 70 movements haves been divided as such and tested in the junction models. Where the division resulted in fractions of movements these have been rounded up. b) The Applicant confirms that the construction programme can allow for theses breaks in access/egress of vehicles. In terms of peaks in construction vehicle movements, the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** tests the movement of construction vehicles out of the peak traffic hour and demonstrates there is sufficient capacity on the road network. So, if there were short peaks due to build up of vehicles this could be accommodated. Details on the change in construction and operational traffic for Junction 34 before the AM peak (07:00-08:00) and before the PM peak (16:00-17:00) is available in the TA [AS-108a], Tables 9-6, 9-7, 9-10, 9-15, 9-16.

ExQ1	Question to	Question	Response
		Para 4.1.3 of ES Chapter 19 [AS-038] states that: *the hourly construction flows as identified in the first assumption have been added to the network peak hours (08:00-09:00, 15:00-16:00, 17:00-18:00)*. c) Tables 4-7 and 4-8 do not refer to 15:00-16:00; where can this information be found? d) Tables 4-15 to 4-19 refer to 'AM Peak' and 'PM Peak'. Which hour does the 'PM Peak' relate to? Where can information relating to the other 'PM Peak' hour be found? e) Table 4-19 (relating to transfer tunnel and shafts) sets out some 'significant' effects on Horningsea Road and J34 which 4.2.65 and 4.2.66 explain would be mitigated by restrictions on construction traffic movements to times outside of the peak hours, such that the effect during the peak hours would be 'not significant'. Similarly, Table 4-43 (relating to WWTP construction) identifies 'significant' effects which would be mitigated by peak-hour movement restrictions. However, the Baseline Traffic Surveys [APP-141] appear to show that, in some cases the baseline traffic flow outside of the peak hours of 08:00-09:00, 15:00-16:00 and 17:00-18:00 is of a similar order of magnitude to the baseline traffic flow during the 'peak' hours, for example: • Site 16 / A14 off-slip between 16:00 and 17:00 (see PDF page 218/405 of [APP-141]) • Site 17 / Horningsea Road between 07:00 and 08:00 (Arm A Approach), 09:00 and 10:00 (Arm B Approach) and 16:00 and 17:00 (both approaches) (see PDF page 228/405 of [APP-141]) Similarly, 9.5.24 of the TA [AS-108] states: *The hours outside of AM and PM peaks have significantly lower traffic volumes compared to the peak hours.* However, movements on the A14 off-slip (AM and PM) and the on-slip (PM) for times outside of the peak hours are not significantly different from peak hour movements according to the data presented in Table 9-6. A similar situation is apparent in Table 9-10. Please provide additional analysis of the locations listed below during the following hours: 07:00-08:00 (including any 'mobilisation' movements); 09:00-10:00; and 16:00-17:00. Please do this by way of a tracked changes update to ES Chapter 19, setting out the significance of the effects and, where relevant, any mitigation measures: (i) Horningsea Road – Northbound ahead; (ii) Horningsea Road – Southbound ahead; (iii) J34 on-slip; and (iv) J34 off-slip. Please include all traffic that would be added simultaneously to those locations by any part of the Proposed Development (for example from works at both the proposed WWTP site and the Transfer Tunnel worksite).	c) Paragraph 4.1.3 of the ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]** should state, "the hourly construction flows as identified in the first assumption have been added to the network peak hours (08:00-09:00 and 17:00-18:00)." The ES will be updated accordingly. Details on the change in construction and operational traffic for Junction 34 before the AM peak (07:00-08:00) and before the PM peak (16:00-17:00) is available in the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a],** Tables 9-6, 9-7, 9-10, 9-15, 9-16. d) The PM peak refers to 17:00-18:00. In the ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]**, the AM and PM peak periods refer to 08:00-09:00 and 17:00-18:00 unless stated otherwise. e) The Applicant has compared vehicle flows at Horningsea Road / Junction 34 across the AM peak (08:00-09:00) and the hour before and after the AM peak (07:00-08:00 and 09:00-10:00). The Applicant has also compared vehicle flows at Horningsea Road / Junction 34 across the PM peak (17:00-18:00) and the hour before the PM peak (16:00-17:00). The comparison confirms that vehicle flows are lower in the hours outside of the peak. Therefore, the significance of effects will also be lower. The Applicant can undertake further analysis including junction modelling which will be completed and provided at Deadline 3.
20.56	Applicant, SCDC, CCoC, Network Rail Infrastructure Limited	**Construction phase - cumulative impacts** 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 limited through the*	The Applicant's response to the points are as follows: a) From consultation (from November 2022) with the Waterbeach Development Company, it is understood that the construction programme for the relocation of Waterbeach station is to construct the station for opening by December 2025, with construction likely to commence in December 2024. These activities are not yet initiated and it is assumed, at a worst case, that the construction work would overlap with the construction of the Waterbeach pipeline. The programme for the Waterbeach station redevelopment indicates the station and the link road taking 12-18 months to complete. Regarding construction traffic information: • The construction route for vehicular access is shown as from the A10 and following Denny End Road, Bannold Road and Bannold Drove to access the construction site.

ExQ1	Question to	Question	Response
		proposed construction management of the transport network and are not significant. **To the Applicant:** a) A) What efforts have been made to obtain construction traffic information for the Waterbeach Station Relocation? b) B) How can it be concluded that an effect that is not known can be mitigated? c) C) Could the potential for cumulative impacts be reduced or avoided by routing construction traffic through Horningsea? d) 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; **To SCDC, CCoC and Network Rail Infrastructure Limited:** Are you satisfied with the approach suggested by the Applicant?	• Construction traffic routes will be managed by a Construction Environment Management Plan (CEMP) secured through a planning condition • Construction traffic routes will be managed by a Construction Environment Management Plan (CEMP) secured through a planning condition • The Transport Assessment in the current planning application did not include construction numbers. In discussions with SLC Rail/WBDC the Applicant has not been made aware of any recent assessment data in relation to the station redevelopment. As there was no available data for predicted vehicle movements in construction, alternative vehicle volumes sourced from different, but similar, station planning applications (Cambridge North and Thanet Parkway, Kent) have been considered. This sets construction traffic movements to 42 vehicle movements per day. The split between types of vehicles is assumed to be 12 HGVs and 30 cars/van/LGVs. The Applicant reviewed the station details and both comprised larger car parking areas, and slightly longer platform areas but were similar enough to provide a suitable assumption for Waterbeach in the absence of other data. Additionally, it is noted that the construction vehicle movements required for the Waterbeach pipeline programme will fluctuate. It is anticipated that these activities will be highest during the first 8 weeks of construction when all the equipment including the pipe sections, pipe rings, plant and machinery are delivered to site and the compound area set up. Similarly, in the last 8 weeks of the programme activities and associated construction vehicle movements will also increase due to the removal of hardstanding plant and machinery, and compound equipment. Between these two periods, for 35-44 weeks, construction vehicle movements will reduce significantly and would largely be limited to one off deliveries for specific infrastructure items i.e., additional pipework and fittings along with travel to and from site by operatives, supervisors, and managers along with associated visitors. For the 8 weeks before and after the 35-44 week period, construction movements can be summarised as: Construction vehicle movements travelling to work sites north of the A14: 82 daily Construction vehicle movements travelling to work sites south of the A14: 90 daily b) The ES Chapter 22 (App Doc Ref 5.2.22) [AS-044] acknowledges that the simultaneous construction of the three developments could result in a significant cumulative effect, and there could be adverse impacts. The inclusion of the Construction Forum and Traffic Working Groups in the Construction Traffic Management Plan, Section 3 (App Doc Ref 5.4.19.7) [AS-109] is the mechanism for managing construction effects, such as overlap of construction phases from different projects that are not fully defined or could be subject to change. Additionally, the CoCP Part B (App Doc Ref 5.4.2.2) [AS-161] Section 3.4 'Cumulative Effects' Any site specific measures required as a result any overlapping Waterbeach New Town Train Station construction activities will be included within a detailed CEMP. These measures will be developed and agreed though engagement with the Train Station developers. The Applicant confirms that the issue of ongoing coordination specifically in relation to the interface on access and vehicle movements and the layout of the pumping station is covered within the SOCG with both SLC Rail and WBDC (App Doc Ref 7.14. 10 and App Doc Ref 7.14.19). c) The Applicant has tested the reasonable worst case that all traffic would come from the nearest strategic or major road, for Waterbeach this is the A10. The Applicant considers this is manageable through the Construction Forum and Traffic Working Groups detailed in the Construction Traffic Management Plan, Section 3 (App Doc Ref 5.4.19.7) [AS-109] as the mechanism for managing construction effects, such as overlap of construction phases from different projects.

ExQ1	Question to	Question	Response
			d) The Applicant is in discussion with the Waterbeach New Town developers in regard to their construction program for building their construction haul road. The Applicant confirms that the issue of ongoing coordination specifically in relation to the interface on access and vehicle movements and the layout of the pumping station is covered within the SOCG with both SLC Rail and WBDC (App Doc Ref 7.14. 10 and App Doc Ref 7.14.19). Through these ongoing discussions, if it is established that this becomes a viable alternative to routing construction vehicles through Waterbeach it will be considered through the CTMP and interface arrangements as required by section 3.4 of the CoCP Part B (App Doc Ref 5.4.2.2). The Applicant refers to the intention to create a Construction Forum as described within paragraph 3.1.10 of the CTMP (App Doc Ref 5.4.19.7) **[AS-109]**, which covers the commitment to coordinate with Waterbeach (and others) in relation to traffic management. Requirement 9 of the draft DCO (App Doc Ref 2.1) **[AS-139]** secures the provision of a detailed CTMP for each phase of the development, to be submitted and approved alongside the CEMP for such phase. Through this approval process, the Applicant would agree with the LPA approaches to traffic management including coordination with other parties. The Applicant therefore considers that Requirement 9 of the draft DCO sufficiently addresses this comment.
20.57	Applicant, CCoC	**Assessment of impacts - construction phase** The ES assesses effects in relative terms and quantifies the magnitude of the effects based on the percentage increase in traffic and the assessment thresholds in Institute of Environmental Management and Assessment (IEMA) guidance. This means that some increases in traffic are not considered to be significant. Are there any instances where, even if the change in traffic volume is below the IEMA thresholds, the absolute increase in traffic could result in a harmful impact / an impact that requires mitigation?	The Applicant notes the point about smaller increases in traffic resulting in impacts from the ExA. The Applicant has followed guidance from IEMA guidelines for traffic and the ES Chapter 19 (App Doc Ref 5.2.19) **[AS-038]** reports on the likely significant effects based on the percentage thresholds provided by IEMA. Impacts associated with traffic volume increases below the IEMA thresholds would only be felt in areas of high sensitivity or areas where a number of sensitive receptors are located. While Rule 1 of the IEMA guidelines (30% change in total volumes or HGVs) cannot address this, Rule 2 of IEMA requires links or locations with particularly sensitive receptors or areas to be assessed where traffic flows have increased by 10% or more. Para 2.21 of the IEMA guidelines also states that "it would not be appropriate to consider links where traffic flows have changed by less than 10%, unless there are significant changes in the composition of traffic e.g., a large increase in the number of HGVs". A number of roads / links in the ES Chapter 19 (App Doc Ref 5.2.19) **[AS-038]** would have therefore been excluded from a detailed assessment owing to a percentage change in traffic less than the assessment thresholds in IEMA. While such roads / links would have been scoped on environmental grounds, the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** would have assessed all roads / links in the junction modelling and would have given consideration to these on transport grounds. The ES Chapter 19 App Doc Ref 5.2.19) **[AS-038]** presents the percentage change for all routes part of the construction route (shown in tables 4-8, 4-28, 4-30, 4-56, 4-76). Specific links / roads have then subsequently scoped out based on the percentage change. For example, Table 4-8 of the ES Chapter 19 App Doc Ref 5.2.19) **[AS-038]** shows the links required for the construction of the waste water transfer tunnel. The absolute change is noted to be below 10% for arms of the Milton Interchange / Junction 33 and has therefore been scoped out on environmental grounds. The junction modelling results within the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** however notes that Junction 33 operates within capacity in the construction phase, and that the peak hour restrictions on construction vehicles within Section 6.5 of the CTMP (App Doc Ref 5.4.19.7) **[AS-109]** would help mitigate the potential peak hour impact.
20.58	Applicant	**Outline Construction Workers Travel Plan** Has consideration been given to remote parking and the use of buses / shared vehicles to transport construction workers to and from the construction areas? If not, is this a possibility?	The Applicant notes that there is the possibility to use remote parking areas. In Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]** the reasonable worst case has been tested assuming that workforce will park on site and there are measures to implement car sharing or use of busing.

ExQ1	Question to	Question	Response
			The Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109]**, paragraph 7.2.3 notes "the requirement for the Principal Contractor to implement a system for monitoring the movement of vehicles associated with the construction of the Proposed Development." Through the construction forum, as noted in Para 3.1.10 of the CoCP Part A (App Doc Ref 5.4.2.1) **[APP-068]** there are opportunities to look at the use of remote sites, such as the Park and Ride sites at Milton and Newmarket Road with the potential to look at parking workforce and using busing or shared vehicles.
20.59	CCC, SCDC, CCoC	**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.* a) Please set out the measures that you consider should be included. b) How should the CWTP be secured, monitored and enforced?	Not for the Applicant
20.60	CCC, SCDC, CCoC	**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?	Not for the Applicant
20.61	Applicant	**Construction Workers Travel Plan** How do workforce numbers in section 6.2 of the CWTP [APP-150] reconcile with Table 7-4 of the TA [AS-108]? Please provide a consolidated table with actual numbers alongside percentages.	The Applicant believes the ExA question is answered by paragraph 6.2.3 in section 6.2 of the Construction Workers Travel Plan (CWTP) (App Doc Ref 5.4.19.9) **[APP-150].** This sets out that 211 workforce vehicles per peak day access the site. Table 7-4 in the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** then shows how the 211 workforce arrive over that peak day.
20.62	Applicant	**Construction traffic restrictions – peak hours restrictions** The Applicant has indicated that there would be no construction traffic movements during three 'peak' periods. a) Would any vehicles that are already at worksites remain on those sites? b) Where vehicles are travelling to sites, please describe (preferably illustrate on a map) the area that those vehicles would be excluded from so as not to contribute to peak traffic in that area. c) Where vehicles are close to that area but cannot enter it because it is a 'peak' time, where would the vehicles wait (ie where are the areas indicated in 6.5.5 of the CTMP [AS-109])? d) Bearing in mind that a number of large construction projects are expected to take place in and around Cambridge in the near future, how would parties be able to identify which vehicle movements are connected with the Proposed Development so as to ensure compliance with the CTMP?	The Applicant's response to the points are as follows: a) The vehicles already on site are able to be held on site to avoid the peak period travel. b) A route map of where construction traffic will be directed is attached to this response. This plan is contained at Figure 19.2, Book of Figures – Traffic and Transport, App Doc Ref 5.3.19 **[AP-066].** Additionally, there is also a commitment to avoid HGV movements through Waterbeach during school drop-off and pick-up hours throughout term time, at Para 6.9.10 of the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109]**. The Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109]**, paragraph 7.2.3 notes "the requirement for the Principal Contractor to implement a system for monitoring the movement of vehicles associated with the construction of the Proposed Development. This would include: • Documented pre-commencement meetings with the site management team as a contractual requirement. • Automatic Number Plate Recognition (ANPR) cameras along Horningsea Road. • Active traffic management: through real-time monitoring of construction vehicle locations (question 20.63 includes more detail); and • Fleet Operation Recognition Scheme, Construction Logistics and Community Safety accreditation or Considerate Contractor Scheme membership to ensure contractors are signed up to ensure a minimum level of service. c) Para 6.5.4 of the CTMP (App Doc Ref 5.4.19.7) [AS-109] states that the use of consolidation centres or stop and wait points along the Strategic Road Network would not be required due to the site access of the proposed WWTP and proximity to the A14. Lorry parks and lay-bys on the A14 may however be required. An example would be the layby, located to the east on the A14 between Junction 34 and 35 would be used temporarily. As previously noted if this did become

ExQ1	Question to	Question	Response
			a requirement the Applicant can discuss and agree usage with National Highways through the Construction Forum set out in the CTMP (App Doc Ref 5.4.19.7) [AS-109. d) The Applicant will make of ANPR cameras to record site vehicles entering/leaving site. ANPR will be installed at the follow locations (subject to approval from the Local Highway Authority): - On Horningsea Road, located immediately north and south of the A14 signalised junctio*ns;* - North of Low Fen Drove Way to capture construction vehicles associated with temporary site access points 10; and - At the proposed WWTP site access on Horningsea Road once the proposed WWTP site access is operational
20.63	Applicant	**Construction traffic restrictions – geofencing** On page 25 of Applicant Regard to Section 47 Consultation Responses [APP-166]) the potential use of geofence technology is noted. a) In which locations would the geofence operate? b) Given the nature of the local road network, where would HGVs turn if they are stopped by the geofence technology? c) Could this result in safety or congestion issues? d) Would there be independent oversight of the effectiveness of this measure?	The Applicant's response to the points are as follows: a) Geofencing for operational HGVs will be set up North of the proposed new access (J34 of the A14) and South of the West bound slip road to warn drivers and logistics managers of any HGV traffic travelling into or out of Horningsea or Fen Ditton b) The geofencing would be at the junction so would have to continue on their correct roe guidance. Both prohibited directions also have weight restrictions meaning the HGV GPS guidance systems would also guide them away from entering the villages. c) The operational HGVs will not be permitted into the villages due to the geofencing and the weight restriction. d) The Applicant currently manages all of its HGV sludge and cake fleet from Cambridge where it covers the entire region where its HGV fleet encounters restricted accesses in many remote locations that require its technology to work effectively in preventing incorrect use of the highways. The Applicant does not foresee a need for this operation to have independent oversight but will welcome community engagement on the efficacy of its operational HGV operation.
20.64	National Highways	**Construction traffic – marshalling on the strategic road network** In the CTMP [AS-109] the following is noted: *4.2.4 The off-slip and on-slip of the A14 have been identified as a potential conflict area that may require traffic marshalling during peak hours.* Is it acceptable to National Highways that marshalling would take place on its network? If yes, does National Highways have any guidance or requirements in relation to marshalling that should be taken into account?	Not for the Applicant.
20.65	Applicant	**Mitigation – Denny End Road** a) Para 4.2.222 of ES Chapter 19 [AS-038] states *The A10/Denny End Road junctions (required for the movement of construction vehicles for the Waterbeach pipeline) will operate over capacity in the 2026 baseline ('Without Development') in the AM peak. Therefore, this junction is likely to require intervention by others prior to 2028 (opening year).* a) Who would 'intervene' to address this capacity issue and when? Is there an approved and funded scheme? b) Before 'intervention', is it acceptable that construction traffic is added to this junction if it is already over capacity? Would this lead to safety issues? c) Should capacity enhancement works be completed before construction traffic related to the Proposed Development is routed through this junction? d) If there are issues / concerns, would routing some construction traffic through Horningsea lessen those concerns? e) Should the Proposed Development make any contribution towards capacity enhancement works?	The Applicant recognises that this statement within the paragraph 4.2.222 of the ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]** is incorrect. The incorrect statement reads as follows: "*The A10/Denny End Road junctions (required for the movement of construction vehicles for the Waterbeach pipeline) will operate over capacity in the 2026 baseline ('Without Development') in the AM peak. Therefore, this junction is likely to require intervention by others prior to 2028 (opening year)"* Table 19-18 of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** shows that the A10/Denny End Road junction will operate within capacity in the 2026 future baseline. Table 9-20 shows that the junction will operate within capacity in the 2026 future baseline with added construction flows. The statement in Para 4.2.222 of Environmental Statement Chapter 19 will be corrected to: *"The A10/Denny End Road junctions (required for the movement of construction vehicles for the Waterbeach pipeline) will operate within capacity in the 2026 baseline ('Without Development') in both the AM peak and PM peak".* Table 19-18 of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** shows that the A10/Denny End Road junction will operate within capacity in the 2026 future baseline. Table 9-20 shows that the junction will operate within capacity in the 2026 future baseline with added construction flows.

ExQ1	Question to	Question	Response
			a) See above response. b) See above response. c) See above response. d) A commitment was made a Phase 2 Consultation to avoid routing HGV construction traffic through the village of Horningsea via High Street. The Construction Forum, as detailed in the Construction Traffic Management Plan (App Doc Ref 5.4.19.7) **[AS-109],** which is secured through Requirement 9 of the draft DCO (App Doc Ref 2.1) could agree that change if it was felt necessary to mitigate impacts to the junction if that was seen to be an appropriate measure. e) The corrected assessment indicates there is no impact at the A10/Denny End junction and therefore no contribution is required.
20.66	Applicant	**Mitigation – CTMP** At 6.9.10 of the Construction Traffic Management Plan [AS-109] it is stated that *There is also a commitment to avoid HGV movements through Waterbeach during school drop-off and pick-up hours throughout term time and to reinstate any areas of footpath affected by the works and to maintain the existing alignment/gradient as much as is practicable.* Where is this commitment set out, and how would it be secured and enforced?	The Applicant has a commitment as set out in the Construction Traffic Management Plan (App Doc Ref 5.4.19.7) **[AS-109]** and secured by Requirement 9 of the dDCO (App Doc Ref 2.1) **[AS-139]** to manage HGV movements to out of peak hours. Enforced by the following measures, as set out in response to question 20.62: • Documented pre-commencement meetings with the site management team as a contractual requirement. • Automatic Number Plate Recognition (ANPR) cameras along Horningsea Road. • Active traffic management: through real-time monitoring of construction vehicle locations (question 20.63 includes more detail); and • Fleet Operation Recognition Scheme, Construction Logistics and Community Safety accreditation or Considerate Contractor Scheme membership to ensure contractors are signed up to ensure a minimum level of service.
20.67	National Highways, CCC, SCDC, CCoC	**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? b) Are they enforceable? c) Do you have any examples of where similar measures have been successful or unsuccessful? 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? Overall, what are your views on the use of secondary mitigation to address highways impacts in this case?	Not for the Applicant
20.68	Applicant	**Trip generation – clarification regarding Phase 2** Does the implementation of Phase 2 / the extension of the Proposed Development in 2036 (as noted on Figure 1.1 of ES Chapter 2 [APP-034] but not described in TA [AS-108] section 2.3 'Construction Programme') give rise to any additional impacts? Please indicate where Phase 2 has been analysed in the TA.	The Applicant's states that the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** has considered the operation of the proposed development in 2038 and effects. The construction of the Phase 2 development is summarised in the ES Chapter 19 (App Doc Ref 5.2.19) [AS-038] and alongside the operation of the proposed development, would have similar vehicle numbers to the 2038 operation assessment undertaken. Therefore, the 2038 assessment represents the likely worst case impacts on the highway network. Phase 2 / the extension of the Proposed Development would not generate additional impacts. Phase 2 / the extension of the Proposed Development would require a detailed submission to the

ExQ1	Question to	Question	Response
			relevant LPA for approval in relation to the works. Schedule 2, Part 1, Requirement 7 'Detailed design' of the dDCO (App Doc Ref 2.1) **[AS-139]** states that no phase of the authorised development is to initiate until details relating to the works proposed in that phase have been submitted to and approved by the LPA.
20.69	Applicant	**Trip generation – clarification regarding Phase 2 / future growth** The RR on behalf of Marshalls [RR-030] states that the site access arrangements appear to be close to capacity up to 2038 and expresses concern that sufficient flexibility may not have been built into the site access proposals and operational access strategy to facilitate longer term growth or to accommodate a situation where the volume or origins of vehicles entering and exiting the site differs from that tested in the TA. Please respond to these observations.	The Applicant directs towards the ES Appendix 19.10 Outline Operational Logistics Traffic Plan (OLTP) (App Doc Ref 5.4.19.10) **[AS-111]** proposals are set out to act as mitigation to further impacts on the junction operation by controlling the peak hour HGV traffic should background traffic growth be as forecasted. These measures include: • Out of peak delivery periods (minimal deliveries during 08:00-09:00 and 17:00-18:00) • Restricting HGV travel through Horningsea and Fen Ditton • Best practice for vehicle drivers • An Operational Workers Travel Plan (OWTP) (App Doc Ref 5.4.19.8) **[APP-149]**; and • Continued engagement in the local community and with the Emergency services Schedule 2, Part 1, Requirement 19 of the dDCO (App Doc Ref 2.1) **[AS-139]** secures: (1) the requirement for a detailed operational logistics traffic to be submitted and approved in writing the relevant LPA; and (2) the detailed operational logistics traffic submitted to the LPA must accord with the measures set out in the outline operational logistics plan and must include details of HGV delivery times and HGV routeing and monitoring proposals. The volumes and assignment could be modified by the Applicant through the same OLTP, in consultation with CCoC. Therefore, the Outline OLTP can be flexible to ensure the operational aspects of the proposed development do not have significant impact on the local road network, including A14 J33. Regarding Phase 2 / future growth of the proposed WWTP, the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** has considered the operation of the proposed development in 2038 and effects. The construction of the Phase 2 development is summarised in the ES Chapter 19 (App Doc Ref 5.2.19) **[AS-038]** and alongside the operation of the proposed development, would have similar vehicle numbers to the 2038 operation assessment undertaken. Therefore, the 2038 assessment represents the likely worst case impacts on the highway network. Phase 2 / the extension of the Proposed Development would not generate additional impacts.
20.70	Applicant	**Trip generation – clarification regarding operational traffic** Please clarify where the journeys noted in Table 4-12 of ES Chapter 16: Material Resources and Waste [APP-048] are considered in the TA – they are not specifically noted in Table 2-5 of the TA [AS-108].	The Applicant can state that the journeys shown in Table 4-12 (approximately 1 skip lorry daily), are included in the operational totals presented in the TA [AS-108a]. They are acknowledged as being part of the HGV volumes, in Environmental Statement, Volume 2, Chapter 2 – Assessment Approach (App Doc Ref 5.2.2) **[APP-034],** referee Table 2-12, Maximum design envelope for traffic and transport assessment.
20.71	Applicant	**Trip generation – sludge etc imports and exports** At 2.6.3 of the TA [AS-108] it is stated that: *Existing and future estimates of maximum number of HGV movements (two way) are outlined in Table 2-6. The future estimates are based on when the proposed WWTP is at full capacity. When the proposed WWTP is commissioned (i.e., year 1 of operation), it is likely that the traffic movements at that time will be similar to the existing Cambridge WWTP.* a) Please state approximate years for the 'existing' and 'proposed' years in Table 2-6.	The Applicant's response to the points are as follows: a) The 'existing' year would represent vehicle movements at the existing Cambridge WWTP in 2022 which have been used as a basis for assessment presented within the Environmental Statement, Volume 2, Chapter 2 - Project Description (App Doc Ref 5.2.2) **[APP-034]**. The 'proposed' year is operation year 1 plus 10 (assumed to be 2038 based on the construction programme presented within the ES Chapter 2 - Project Description (App Doc Ref 5.2.2) **[APP-034]**) once the full build out of the Proposed Development has been completed.

ExQ1	Question to	Question	Response
		b) Why would there be more HGV movements in the future – for example is this due to a larger area being covered or due to population growth (with the area served remaining broadly the same)? c) Does a growth factor need to be applied to reflect future population growth in the area served? d) Please briefly describe the existing local routing of such traffic and whether there would be any benefits arising from re-routing it from the existing to the Proposed WWTP, for example would there be a reduction in traffic on Milton Road?	b) A larger number of HGV movements in the future would be required due to expected population growth in the area served by the Proposed Development (with the area served remaining broadly the same) and is in line with the Phase 2 development indicated as being constructed in 2036, noted on Figure 1.1 of ES Chapter 2 - Project Description (App Doc Ref 5.2.2) [**APP-034]**. c) The TEMPro growth factors have been applied up to the year 2038, which corresponds to the opening of the proposed WWTP plus 10 years. d) In operation, the proposed WWTP would be accessed via Junction 34 of the A14 only. • For operational vehicles coming from the west of the proposed WWTP on the A14: operational traffic will access the proposed WWTP via the Junction 34 off-slip, make a left-turn onto Horningsea Road, then a right into the access road. • For operational traffic coming from the east of the proposed WWTP on the A14: operational traffic will travel westbound past Junction 34 and to Junction 33, where it would exit the A14 via the Junction 33 off-slip, travel around the Junction 33 roundabout to access the A14 via the Junction 33 on-slip, then travel eastbound towards Junction 34 where it will use the Junction 34 off-slip to access the proposed WWTP. • For vehicles egressing the proposed WWTP, these would be required to make a left-turn out of the permanent access road, due to the design of the traffic island preventing right-turns towards Horningsea, then access the A14 on-slip at Junction 34. • Due to this routing and the reassignment of operational traffic, associated vehicles accessing the proposed WWTP would not travel on Cowley Road and Milton Road. Junction 33 of the A14 would continue to be used by operational traffic needing to travel east on the A14 from the proposed WWTP as they are not able to able travel east from Junction 34. • Once the Proposed Development is completed and operational and the decommissioning of the existing Cambridge WWTP has been completed for the purpose of permit surrender, no vehicle movements associated with the proposed WWTP would make use of Milton Road and Cowley Road.
20.72	Applicant	**Trip generation – Discovery Centre** Table 8-6 'Expected daily trips for the discovery centre' of the TA [AS-108] estimates between six and seven two-way journeys by car or on foot. a) If there would not be any journeys by the other modes listed in Table 8-6, why is a coach parking space shown on the submitted Design Plans (e.g. PDF Page 9/12 of [APP-025])? b) If coach trips are anticipated, does this indicate that the TRICS data are not representative of the usage of the Discovery Centre that is expected by the Applicant?	The Applicant's response to the points are as follows: a) To calculate the anticipated trip generation of the Discovery Centre, suitable all-person trip rates were extracted from the industry standard TRICS® using a selection of analogous sites. Of the three sites that met the established criteria, the site selected, as shown in Table 8-3 of Transport Assessment Part 1 (Doc 5.4.19.3) **[AS-108a]**, was considered to provide the closest comparison with the proposed Discovery Centre in terms of floorspace and public transport provision, as the other two sites were in city centre locations. However, no coach trips were recorded for the selected sites. I The coach space has been included because the Discovery centre will cater for schools groups and the like, who would be likely and be encouraged by the Travel Plan, to travel that way. In terms of modelling a worst case has been assumed with all car trips tested for junction operation. b) The anticipated trip generation sourced from TRICS for visitors to the proposed Discovery Centre is considered to be representative of a typical day. The Discovery Centre is a managed facility so for visitors, including coach trips these will be managed by the Applicant and notification of any expected coach arrivals will be communicated in advance with Anglian

ExQ1	Question to	Question	Response
			Water operational staff. Coach trips would be managed in line with measures set out within the Outline Operational Logistics Traffic Plan (OLTP) (App Doc Ref 5.4.19.10) **[AS-111]** and Operational Workers Travel Plan (OWTP) (App Doc Ref 5.4.19.8) **[APP-149],** will make use of sustainable transport modes to travel to the location of the proposed WWTP.
20.73	Applicant	**Trip generation / junction modelling – office staff** a) Does the '2033 operational traffic only' in Table 9-11 of the TA [AS-108] include the 30 peak hour office worker journeys set out at Table 8-2? b) Would it be accurate for the ExA to report that in 2033, between two-thirds and three-quarters of the predicted increase in traffic on J34 during peak hours would be attributable to the proposed office floorspace?	The Applicant's response to the points are as follows: a) The Applicant confirms that Table 9-11 does include the 30 peak hour office worker journeys. b) Measures set out the Outline Operational Logistics Traffic Plan (OLTP) (App Doc Ref 5.4.19.10) **[AS-111]** include a restriction on operational HGVs and daily deliveries / supervisor movements (cars and LGV) during the AM (08:00-09:00) and PM (17:00-18:00) peak hours. This is also shown in Table 8-2 of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**. With Outline OLTP measures in place, it would be expected that the only operational traffic movements to and from the site during the AM and PM peak hours would be attributable to the proposed office floorspace.
20.74	Applicant	**Junction modelling – clarification / explanation** In respect of Table 9-14 (2038 without and with operation) of the TA [AS-108], for 'Horningsea Rd SB' and 'Horningsea Rd Bridge NB' why does the PM degree of saturation (DoS) decrease in the 'with operation' scenario, even though the PCU figure is higher?	The Applicant recognises the slight difference in degree of saturation (DoS) and for these arms between the 2038 without and with operation scenario within Table 9-14 of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a].** The model outputs will be reviewed and updated, but it is not expected the updated results will result in a significant change to DoS or PCU. This will be provided at Deadline 3. It should also be noted that the operational results presented in Table 9-12 represent the reasonable worst-case scenario, where it has been assumed that operational vehicles would travel during AM and PM peak periods. In reality, measures set out the Outline Operational Logistics Traffic Plan (OLTP) (Doc 5.4.19.10) **[AS-111]** would restrict operational HGV movements in the AM and PM peak hours. This would reduce impacts on this junction to not significant as set out in Table 9-16.
20.75	Applicant	**Junction modelling – clarification / explanation** With reference to Table 9-16 of the TA [AS-108], why are some PCU and DoS lower when the WWTP is in operation?	The Applicant recognises the slight difference in DoS and for these arms between the 2038 without and with operation within Table 9-16 of the Transport Assessment Part 1 (Doc 5.4.19.3) **[AS-108a]** The model outputs will be reviewed and updated, but it is not expected that updated results will result in a significant change to DoS or PCU, and the results will demonstrate that the junction operates within capacity for operation Year 1 +10 (2038) without and with operational traffic before AM peak hour (07:00-08:00) and before PM peak hour (16:00-17:00). This will be provided at Deadline 3.
20.76	Applicant	**Junction modelling – commitments** With reference to TA [AS-108] para 9.2.3, please list the cumulative schemes that have been included in junction modelling for each of the years listed (2026, 2028, 2033, 2038).	The Applicant can state that the cumulative schemes considered for 2026, 2028, 2033, and 2038 are set out Chapter 6 of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**. These are as follows: • Waterbeach New Town, including the relocation of the Waterbeach Station. • Marleigh Development. • Land north of Cherry Hinton. • Cambridge Eastern Access Scheme; and • Cambridge Northern Fringe East and Cambridge North railway station area (allocated for high quality mixed-use development). As noted in the response, 20.77, the use of the TEMPRO growth factor to apply to the baseline to represent likely growth was agreed with CCoC and covers the broad range of major planned developments that would have potential impact on the wider highway network. These discussions are recorded in the ES Chapter 19 (App Doc Ref 5.2.19) **[AS-038**], in section 1, Table 1.5 recording the TWG meetings.

ExQ1	Question to	Question	Response
20.77	Applicant, CcoC	**Junction modelling – commitments** 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:* • *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.* *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.* a) Please explain whether any of these commitments have been taken into account in the assessment of the operational phase of the Proposed Development. b) If not, please explain why it is not necessary to include an assessment of these proposals. 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?	The Applicant can confirm these commitments have been considered by the use of TEMPro growth factors. Transport Assessment (App Doc Ref 5.4.19.3) **[AS-108a]** Section 7 'Trip Generation', paragraph 7.3.1 summarises that TEMPro growth factors have been used to account for future growth from cumulative schemes / committed developments for both construction and operational phases. The modelling approach has been discussed and agreed with CCoC as sufficient to account for future trip generation in the area, including the committed developments / cumulative schemes listed in the question.
20.78	Applicant	**Junction modelling – robustness of Modelling** The RR on behalf of Marshalls [RR-030] states that *As the performance of the site access and A14 J33 in particular are critical to longer term expansion beyond 2050 and the ability to accommodate committed (and future) Marshall developments, there are some queries on the methodology that supports the current conclusions for the capacity assessment at these junctions. Specifically:* *a) A. Why the traffic data for the strategic road network junctions collected in December 2021 has not been revalidated with data from 2022 and whether there are implications for the capacity conclusions?* *b) B. Whether the future forecast year flows through these junctions include robust forecasts of consented flows from Springstead Village and Marleigh as Appendix K of the TA is missing which sets out the growth assumptions.* *c) C. What assumptions were included for Cambridge East within the junction modelling?* *d) D. How sensitive the conclusions regarding the performance of A14 J33 are in the event that the volume, timing or assignment of operational traffic varies from those within the Transport Assessment?* Please respond to these questions.	The Applicant's response to the points are as follows: a) The traffic flows on key routes were agreed to be counted by Automatic Traffic Counts (ATC) in May 2022 with CCoC at the Traffic Working Group meeting in April 2022. This comparison is contained in the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** Section 5 'Existing Traffic flows', Table 5-1. b) Flows from nearby developments in Springstead Village and Marleigh have been accounted for by using the standard TEMPro growth factors. c) No assumptions have been included for Cambridge East in the modelling. The flows from Cambridge East have been included through the TEMPro growth factors with no further adjustment. d) For the operation phase (2038), Table 9-14 in the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** illustrates that the junction may be operating above its theoretical operational capacity in the typical peak times (08:00 – 09:00 and 17:00 – 18:00) due to general growth in traffic. Therefore, the ES Appendix 19.10 Outline Operational Logistics Traffic Plan (App Doc Ref 5.4.19.10) **[AS-111]** proposals are set out to act as mitigation to further impacts on the junction operation by controlling the peak hour HGV traffic should background traffic growth be as forecasted. The volumes and assignment could be modified by the Applicant through the same OLTP, in consultation with CCoC. Therefore, the outline OLTP can be flexible to ensure the operational aspects of the proposed development do not have significant impact on the local road network, including A14 J33.
20.79	Applicant, National Highways, CCoC	**Operational traffic – assessment of effects – cumulative conclusions** At para 4.5.11 of ES Chapter 19 [AS-038] it is stated that it is likely that junction 34 would have already been operating close to or over capacity in the 2038 future baseline ("without operation") even without the addition of operational traffic from the Proposed Development. As this is a matter relating to background traffic growth, this has been considered as a cumulative effect. Table 4-86 of the ES indicates that a 'major – significant' effect would occur at 'Horningsea Road / A14 on-slip junction – SB in'. 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? 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?	The Applicant's response to the points are as follows: a) The junction modelling has accounted for trip generation from nearby commitments through the use of TEMPro growth factors. The approach that a singular factor can account for future trip generation, including some elements of the committed schemes as set out in para 4.5.7 of Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]**, was agreed with CCoC as part of the Traffic Working Groups on 8 April 2022 held between the Applicant and CCoC. b) The assessments carried out in the ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]** and Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** for the future baseline acknowledge that the future baseline includes traffic generated from nearby commitments may make junction 34 operate close to or over its capacity; hence those committed developments are relevant to the operation of the junction. The operational effects of the proposed WWTP whilst not significant in their own right, have the potential to add further traffic to the junction. The Outline Operational Logistics Traffic Plan (OLTP) (App Doc Ref 5.4.19.10) **[AS-111]** includes measures that can be implemented if the forecast background

ExQ1	Question to	Question	Response
			growth is realised and showing that the impact of the development on the road network can be mitigated if required.
20.80	Applicant, National Highways, CCoC	**Operational traffic – acceptability of impacts** 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.* 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? 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? 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? d) How would any unacceptable outcomes be enforced against and rectified? e) Are the predicted DoS, such as they are increased by the Proposed Development, and suggested mitigation acceptable to the highway's authorities? 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?	The Applicant's response to the points are as follows: a) The mitigation measures proposed as part of the Outline Operational Logistics Traffic Plan (OLTP) (App Doc Ref 5.4.19.10) **[AS-111]** are improvements to the junction capacity. The Applicant is moving HGV vehicles from a busy peak period on the network to a less busy period. This is making use of the spare capacity at the junction without the need to build a larger junction. b) Both the Construction Traffic Management Plan (App Doc Ref 5.4.19.7) **[AS-109]**, and the Outline OLTP [AS-111] include measures to restrict HGV operational movements in both the AM (08:00-09:00) and PM peak (17:00-18:00) periods. As such, operational HGV traffic will not be added to the Horningsea Road / Junction 34 of the A14, which was shown as operating over capacity in the 2038 future baseline (see Table 9-3 of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**. c) As set out in Section 9 of the Outline OLTP (App Doc Ref 5.4.19.10) **[AS-111]**. The appointed site operations manager will be responsible for monitoring and enforcing the measures included in the OLTP. As set out in Section 8 of the OLTP, this will include collecting appropriate data and monitoring breaches and complaints to demonstrate that the requirements of the OLTP have been met. Permanent ANPR cameras will be installed at the site access on Horningsea Road once the proposed WWTP access is operational (subject to approval by Cambridgeshire County Council as the Local Highways Authority and any other relevant stakeholders). As part of the OLTP measures, these will be monitored by the appointed site operations manager and used to inform survey content. d) Breaches and complaints will be monitored and enforced by the appointed site and operations manager. This will be supported by the use of ANPR cameras installed at the site access on Horningsea Road. e) The results of the junction modelling were presented by the Applicant to CCoC and National Highways in a Traffic Working Group meeting held on 8 April 2022. The proposed mitigation measures were also presented by the Applicant. No specific issues were raised. f) As set out in Section 3 of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**, identified national, regional, and local transport policy relevant to the Proposed Development aims to make sustainable modes of transport a viable and attractive alternative to private vehicles. The transport, access, and parking requirements in the South Cambridgeshire Local Plan also aim to achieve a modal share of no more than 40% of trips by car (excluding passengers). Committed sustainable transport schemes in the area around the Proposed Development, including Chisholm Trail cycle route, the Greater Cambridgeshire Partnership Greenways project, the Cambridge Science Park Station, and the Cambridge Science Park Station busway access, would be expected to all contribute towards modal shift away from private vehicles in this area of Cambridge.
20.81	Applicant	**Operational traffic – J34 outside of 'peak' hours** Please provide an assessment of operational traffic at the locations listed below during the following hours: 07:00-08:00; 09:00-10:00; and 16:00-17:00. Please do this by way of a tracked changes update to ES Chapter 19 which sets out the significance of the effects and, where relevant, any mitigation measures: a) Horningsea Road; b) J34 on-slip; and c) J34 off-slip.	The Applicant can confirm that an analysis of these junctions, Horningsea Road, Junction 34 on-slip and Junction 34 off-slip for outside of peak hour operation is contained in Table 9-14 in the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**. The Applicant notes that the hour 09:00-10:00 is not include in this assessment. A review of the traffic data identified that the 07:00 – 08:00 was busier than 09:00 – 10:00 and so only the busier hour was tested to understand if there may be possible traffic capacity problems. Therefore, no further assessment is proposed to be undertaken.
20.82	Applicant, National Highways	**Operational (and construction) traffic – assessment of effects – J35** On page 8 of ES Chapter 19 [AS-038] it is noted that National Highways recommended that an analysis of J35 be undertaken.	The Applicant can confirm that an analysis of Junction 35 of the A14 was not undertaken as construction traffic accessing either the land required for the construction of the proposed WWTP via

ExQ1	Question to	Question	Response
		To the Applicant: a) Why has this not been done? **To National Highways:** Do you still require such an assessment?	the proposed permanent access to be constructed at the start of the construction phase, or the construction access points outlined in Figure A.2. of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**, will not use the junction. All operational vehicle movements will be through Junction 34, with operational vehicles arriving from / departing to the east using Junction 33 (Milton Interchange) of the A14 to turn around.
20.83	Applicant, CCoC	**Assessment of impacts – operational phase** The ES assesses effects in relative terms and quantifies the magnitude of the effects based on the percentage increase in traffic and the assessment thresholds in Institute of Environmental Management and Assessment (IEMA) guidance. This means that some increases in traffic are not considered to be significant. Are there any instances where, even if the change in traffic volume is below the IEMA thresholds, the absolute increase in traffic could result in a harmful impact?	The Applicant notes the point about smaller increases traffic resulting in impacts from the ExA. Impacts associated with traffic volume increases below the IEMA thresholds would only be felt in areas of high sensitivity or areas where a number of sensitive receptors are located. While Rule 1 of the IEMA guidelines (30% change in total volumes or HGVs) cannot address this, Rule 2 of IEMA requires links or locations with particularly sensitive receptors or areas to be assessed where traffic flows have increased by 10% or more. Para 2.21 of the guidelines also state that "it would not be appropriate to consider links where traffic flows have changed by less than 10%, unless there are significant changes in the composition of traffic e.g., a large increase in the number of HGVs". The ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]** recognises the above guidance from IEMA, and notes that there is no percentage change in total traffic greater 10% in 2038 with the proposed WWTP operating, and as such, that a detailed assessment would not have been required. However, despite the addition of a small amount of operational traffic (less than 10%), 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).
20.84	Applicant	**Operational traffic routing** Some RRs raise concerns around an increase in traffic, including sludge tankers, on residential roads during the operational period, for example RR [RR-197], which says *I am particularly concerned about the increase in traffic and pollution which would be caused by both the construction traffic over several years, and by the daily slurry lorries thereafter, which will impact on all residents of Horningsea and surrounding villages.* It appears to the ExA that, under normal circumstances, the routing of vehicles means that sludge tankers would not travel past residential properties / through residential roads in Horningsea, Fen Ditton or other villages. a) Is this correct? b) If so, would the proposed situation represent an improvement when compared with the existing situation – for example do sludge lorries travel past residential properties to access the existing WWTP?	The Applicant's response to the points are as follows: **a)** The mitigation measures outlined in the Outline Operational Logistics Traffic Plan (OLTP) includes a restriction on operational HGV movements through Horningsea and Fen Ditton. All operational HGV movements will use Junction 34 of the A14. Junction 33 of the A14 (the Milton Interchange) will be used for operational vehicle movements needing to travel east from the proposed WWTP. This is set out in paragraphs 8.1.19 to 8.1.12 of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**. **b)** Sludge lorries accessing the existing WWTP use Cowley Road and the A1309 Milton Road. This route does not pass by existing residential properties. The proposed routing of operational HGV movements as part of the Proposed Development would therefore represent a similar situation to that of the existing WWTP.
20.85	National Highways, CCC, SCDC, CCoC	**Operational traffic – mitigation – J34** 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 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.* A number of RRs express concerns about operational traffic running through the villages of Horningsea and Fen Ditton. 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? b) Are the measures enforceable? c) Do you have any examples of where similar measures have been successful or unsuccessful? d) Who would be responsible for ensuring compliance; is it likely that they would have the resources to ensure compliance with the OLTP; and do they need additional resources to ensure compliance?	Not for the Applicant

<table>
<tr><th>ExQ1</th><th>Question to</th><th>Question</th><th>Response</th></tr>
<tr><td></td><td></td><td>Overall, what are your views on the use of secondary mitigation to address highways impacts in this case?</td><td></td></tr>
<tr><td>20.86</td><td>Applicant</td><td>Operational traffic (staff) – mitigation – evidence to support mitigation proposals.
Para 5.3.1 of the OWTP [APP-149] states that Due to the absence of a published travel plan, there is currently no existing data regarding modal splits for the existing Cambridge WWTP to serve as a baseline.
The reasoning for not providing actual data is unclear to the ExA. Given the number of staff working at the existing WWTP site, a survey is unlikely to be particularly onerous. Please endeavour to provide actual evidence to demonstrate current travel patterns at the existing WWTP.</td><td>The Applicant confirms there is no available travel plan (and associated staff travel data) available in relation to the existing Cambridge WWTP to inform the Operational Workers Travel Plan (App Doc Ref 5.4.19.8) [APP-149]. In order to determine an expected modal split for employees travelling to the proposed WWTP the Nomis website 2011 Census ‘Location of usual residence and place of work by method of travel to work’ (Destination mode) data for the South Cambridgeshire 007 MSOA area (E02003781)’ was reviewed. This remains the most current data available to inform this exercise.

The Applicant will undertake a survey for staff members at the proposed WWTP, to inform an updated expected modal split and targets for employees travelling to and from the site. Data from this exercise will be used to update the Operational Workers Travel Plan (App Doc Ref 5.4.19.8) [APP-149] as secured by dDCO (App Doc Ref 2.1) [AS-139], Schedule 2, Part 1, Requirement 12.</td></tr>
<tr><td>20.87</td><td>Applicant</td><td>OWTP - clarification of staff and visitor numbers
It is unclear to the ExA:
a) whether the figures in Section 6 of the OWTP [APP-149] include staff working in the Discovery Centre. Please provide a full breakdown of staff numbers by job type for the existing and proposed WWTP.
b) whether the application documentation includes information in relation to other potential staff including those who might not be directly employed by Anglian Water (e.g. security and cleaning personnel etc). Please provide an estimate for any such personnel as part of the requested breakdown of the number of people working on the site.
Whether account has been taken of additional trips that one would normally be associated with a workplace such as postal / courier deliveries, supplies of office sundries and so on. If not, should an allowance be added for such trips?</td><td>The Applicant’s response to the points are as follows:
a) The proposed Discovery Centre will be staffed, as and when required, by office workers using the facility. The breakdown of staff is as follows:

Existing WWTP<table><tr><td>Role</td><td>Number of persons</td></tr><tr><td>Operations daytime staff</td><td>8</td></tr><tr><td>Operations process controllers</td><td>2</td></tr><tr><td>Operations shift technicians</td><td>4</td></tr><tr><td>Mechanical and electrical specialists</td><td>4</td></tr><tr><td>Office staff</td><td>8</td></tr></table>Source: Operational Workers Travel Plan (Doc 5.4.19.8) [APP-149], Section 5.2.

Proposed WWTP<table><tr><td>Role</td><td>Number of persons</td></tr><tr><td>Sludge technicians</td><td>2</td></tr><tr><td>Operations team</td><td>2</td></tr><tr><td>Maintenance technician</td><td>1</td></tr><tr><td>CHP technician</td><td>1</td></tr><tr><td>Maximum number of office workers using the facility</td><td>30</td></tr><tr><td>Operational visitors to the proposed WWTP</td><td>2</td></tr></table>Source: Environmental Statement, Volume 2, Chapter 2 – Project Description (Doc 5.2.2) [APP-034], Table 5-1

b) All staff have been included in the staff count for the proposed WWTP. Staff including security and cleaning personnel have been included as part of the office worker count. It should be noted that the 30 office workers stated in Table 5-1 of the Environmental Statement, Volume 2,</td></tr>
</table>

ExQ1	Question to	Question	Response
			Chapter 2 Project Description (App Doc Ref 5.2.2) **[APP-034]** is the expected maximum number of office workers using the facility. Additional trips such as postal / courier deliveries and supplies to the office facility have been accounted for in the expected operational trip generation for the Proposed Development.
20.88	Applicant	**OWTP - evidence** Parag 9.5.47 of the TA [AS-108] states that: *the Operational Worker Travel Plan (Appendix 19.8, App Doc Ref 5.4.19.8) will reduce the volume of workforce traveling by single occupancy car.* Para 4.5.21 of ES Chapter 19 [AS-038] indicates that single occupancy vehicle trips would be discouraged, and that remote working would be encouraged. a) Can the Applicant provide any evidence to support its statement that the OWTP would reduce single occupancy car use? b) What degree of certainty can be attached to this statement, bearing in mind the location of the site and the availability of public transport? c) Would any staff be compelled to share car journeys, to use non-car transport, or to work remotely? If yes, how would they be compelled to do so?	The Applicant's response to the points are as follows: a) As set out in the Applicant's net zero strategy to 2030, upgrades to IT infrastructure have enabled and encouraged more virtual meetings and has meant that more office workers can work remotely. The success of flexible and remote working will be built upon as part of the Applicant's net zero strategy to significantly reduce business miles travelled. This move towards remote working would encourage office staff to not travel into the office every day and would reduce the need to travel, and in turn would reduce the number of single-occupancy car trips. b) The Proposed Development will also include embedded 'hard' infrastructure-based measures to facilitate the use of sustainable modes of transport by staff. These are set out in Section 9 of the Operational Workers Travel Plan (OWTP) (App Doc Ref 5.4.19.8) **[APP-149]**. Whilst outside of the project scope, improvements to walking and cycling infrastructure through the Greater Cambridge Greenways' project (see Section 3.11 of Appendix E (WCHAR) of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**) will improve walking and cycling connections to and from the Proposed Development. In combination with the measures set out in Section 9 of the OWTP, this will facilitate greater opportunities for workers to walk or cycle to the Proposed Development. This is reflected in the Operational Workers Travel Plan (App Doc Ref 5.4.19.8) **[APP-149]** modal split targets, set out in Table 8-2. c) The targets set out in the Operational Workers Travel Plan (OWTP) (App Doc Ref 5.4.19.8) **[APP-149]** have been based on those from approved Travel Plans from nearby developments in and close by to Waterbeach, which falls within South Cambridgeshire. Car sharing measures have been included within the OWTP Section 12, and public transport usage targets set out in Section 8. These measures would be part of the detailed OWTP, as set out in the dDCO (App Doc Ref 2.1) [AS-139] Schedule 2, Requirement 12 (1), which states that prior to the operation of the authorised development, a detailed OWTP must be submitted to and approved in writing by the relevant planning authority. Regarding the move towards remote working the Applicant's net zero strategy to 2030 emphasises the need to move towards remote working. With improvements to walking and cycling infrastructure both around and leading into the Proposed Development, the Applicant can attach a good degree of certainty to the statements set out in Paragraph 9.5.47 of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**, and paragraph 4.5.21 Environmental Statement Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]**.
20.89	Applicant	OWTP – sustainable travel In the OWTP [APP-149], Table 8.2 indicates a 55% target for staff driving to work in a car or a van. Table 6.1 estimates that there would be 92 two-way operational staff trips which appears to the ExA to amount to 46 vehicles. Para 6.1.2 says that the daily trip generation for the Discovery Centre is expected to be 13 trips to and from the site which indicates that there would be seven vehicles. In total it appears that there would be up to 53 vehicles on the site. a) Are the above assumptions of the ExA correct? b) Does 46 vehicles (per Table 6.1) represent 55% of the total number of staff on the site? c) What is the ratio of car parking (including visitor parking) to staff members? d) Would parking permits be issued for the use of car parking?	The Applicant's response to the points are as follows: a) The 92 two-way vehicle movements set out in Table 6-1 of the Operational Workers Travel Plan (App Doc Ref 5.4.19.8) **[APP-149]** assumes a worst-case scenario that all staff and visitors use either a car or small van to travel to and from the site. The 13 two-way trips to the proposed Discovery Centre are included in Table 6-1 as the 12 daily two way 'cars' movements. The assumptions of the ExA that there would be up to 53 vehicles on the site is therefore incorrect. There would be up to 46 vehicles from staff and visitors on site.

ExQ1	Question to	Question	Response
		e) Would staff be able to use visitor car parking when no visits to the Discovery Centre are scheduled? If not, how would this be controlled? f) If 71 parking spaces are proposed to serve the Gateway and Workshop buildings, might this appear to represent a significant over-provision of car parking spaces which could encourage people to travel to the site by car or van. Please set out your justification for 71 spaces, bearing in mind that parking policies set out maxima and the aim of planning policy to encourage travel by means other than the private car.	b) The 46 vehicles do not represent 55% of the total number of staff on site. These 46 vehicles would represent 100% of the total staff on site plus visitors as per the worst-case scenario set out in Table 6-1 of the Operational Workers Travel Plan (App Doc Ref 5.4.19.8) **[APP-149]**. c) The ratio of car parking (including visitor parking) to staff members would be approximately 2 spaces per staff member. This ratio has been developed based on the South Cambridgeshire Local Plan Requirements (Policy TI/3) and represents an upper limit of parking. d) This detail would be determined by the Applicant in the detailed OWTP. Schedule 2, Part 1, Requirement 12 states that prior to the operation of the authorised development a detailed operational workers travel plan must be submitted to and approved by the relevant planning authority. The detailed operational workers travel plan must accord with the measures set out in the operational worker travel plan and, the operational workers travel plan must be implemented following commencement of the operation of the authorised development. e) Staff would not be permitted to use the visitor car park during times when no visits to the Discovery Centre are scheduled as with d), this would be secured through Schedule 2, Part 1, Requirement 12 of the dDCO. f) The Applicant confirms that 71 parking spaces for the Gateway and Workshop buildings will be provided, which is below indicative parking standards for Use Class Order B1 Business and Use Class Order B2 General Industrial set out under Policy TI/3 of the South Cambridgeshire Local Plan 2018. The provision of 71 spaces is also designed to prevent staff and visitors from parking on surrounding roads.
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?	The Applicant directs to Section 2.7 (Mitigation measures) within the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]** sets out mitigation measures which aim to reduce the need to travel by car and promote sustainable travel appropriate to the location of the Proposed Development. These include improvements to non-motorised user (NMU) permeability around the site, improvements to existing NMU facilities, and the creation of new NMU routes. These improvements will encourage a greater modal shift to sustainable transport for those travelling to and from the proposed WWTP site. This will be supported by infrastructure-based measures, organisational initiatives, and awareness raising measures set out in the Section 9 of the Operational Workers Travel Plan (App Doc Ref 5.4.19.8) **[APP-149]**, which also includes a Travel Plan target set out in Section 8 to reduce the mode split for single occupancy vehicle trips. As set out in the Applicant's response to question 20.88, improvements to IT infrastructure to enable more remote working, as set out the Applicant's net zero strategy to 2030, would provide the opportunity for office-based workers not travel into the office facility every day and would reduce the need to travel. This is in accordance with Policy TI/2: 'Planning for Sustainable Travel' of the South Cambridgeshire Local Plan.
20.91	Applicant	**Mitigation of effects of housing on existing WWTP** A RR [RR-200] suggests a range of measures that should be adopted to mitigate the effects of the housing at NEC. Should the Applicant be responsible for delivery of any of these mitigation measures, or at least make a contribution towards them? Please set out the justification for your response.	The Applicant can confirm that mitigation measures outlined within RR-200 have been addressed within the Applicant's responses to Relevant Representations. The Applicant's priorities for relieving traffic congestion have been outlined in the Appendix 19.7 of the Construction Traffic Management Plan (CTMP) (Doc 5.4.19.7) **[AS-109]**. Section 6 provides detailed information about connectivity and access to community facilities and residential properties during works, and the CTMP will be developed further in collaboration with stakeholders to ensure it continues to reflect any concerns raised. While the Applicant notes the comment in relation to bus services and connectivity within Cambridge, this is out of the Applicant's jurisdiction and as such will not be responsible for the delivery of these measures. However, the Applicant will continue to engage with the local highways team at CCC with regards to arrangements in relation to bus stops for the WWTP.
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*	The Applicant notes the error in drafting on page xii of ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) **[AS-038]** and that this should refer to Cambridge County Council who are, as noted, the highway authority.

ExQ1	Question to	Question	Response
		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. Is there any need for CCoC (as highways authority) and National Highways to be consulted?	The Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) **[AS-109]** requires that a Community Liaison Officer (CLO) be appointed prior to the commencement of construction activities. The CLO will play a key role in ensuring that relationships and lines communication are maintained throughout the construction period. Section 3 of the Code of Construction Practice (CoCP) Part A (App Doc Ref 5.4.2.1) **[APP-068]** and Section 3 within the Community Liaison Plan (App Doc Ref 7.8) **[AS-132]** provides details on the responsibilities of the CLO, one of which is being main point of contact for stakeholders, providing briefings on construction activities, promoting the project and resolving issues of concern.
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 Applicant's net zero strategy to 2030 sets out that by 2030, 90% of all the small vehicle fleet will be replaced by Electric Vehicles. To help support this, the proposed WWTP site will have provision of 23 spaces equipped with active electric vehicle (EV) charging points upon the commencement of operation. Passive provision for an additional 30% active EV spaces at the proposed WWTP will be provided, as per Policy I/EV of the new Greater Cambridge Local Plan and will be developed as part of the Operational Workers Travel Plan (App Doc Ref 5.4.19.8) **[APP-149]** requirements. This is set out paragraph 2.5.9 of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) **[AS-108a]**, and Table 5-1 of the Outline Operational Logistics Traffic Plan (OLTP) (App Doc Ref 5.4.19.10) **[AS-111]**.
20.94	Applicant, SCDC, CCoC	**Requirement 12 – OWTP** Should this requirement include a provision relating to ongoing implementation of the OWTP? 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?	Section 11 of the Operational Workers Travel Plan (Doc 5.4.19.8) **[APP-149]** describes how monitoring will take place so that the Proposed Development achieves the Travel Plan targets. Staff surveys will take place annually throughout the five-year lifespan of the travel plan. Monitoring of the OWTP will be the responsibility of the Travel Plan Coordinator (TPC). This will be agreed with CCoC and the TPC will report to CCoC. The outcome of the survey will be used to update successive versions of the Travel Plan, which will include new measures if targets are not being met. This is secured through the dDCO (App Doc Ref 2.1) **[AS-139]**, Schedule 2, Part 1, requirement 12.
20.95	CCoC	**Highway network / roads – existing** Do the weight limits on Horningsea Road have any implications for the construction or operational phases of the Proposed Development? Should the weight limits be removed or changed?	Not for Applicant

21. Water resources

ExQ1	Question to	Question	Response
21.1	Applicant	**Drafting error** Please correct the referencing error in para 7.3.1 of the oOMMP [AS-073].	The Applicant will update the oOMMP [AS-073] and provide this at Deadline 2.
21.2	Applicant	**Drafting error** Para 3.1.2 of the FRA [APP-151] refers to Appendix 0 which does not exist – please update the document with the correct appendix reference.	The Flood Risk Assessment (App Doc Ref 5.4.20.1) [APP-151] will be updated following revised hydraulic modelling and further engagement with The Environment Agency for Deadline 3. This incorrect reference to Appendix 0, which should be Appendix A, will be corrected as part of these updates
21.3	Applicant	**Capacity** Please confirm the PE capacity of the existing and proposed WWTP – please identify the Waterbeach Recycling Centre capacity, and the PE capacity of all sites at present and at working at full capacity (a table setting out this information would be helpful). As noted with the Save Honey Hill Group RR [RR-035 Section 8.2], there are differing figures presented within the application documents, so a clear summary of the existing and proposed PE capacity is required. The proposed capacity for different phases of the Proposed Development and future projections would also be helpful as part of the table.	The current design biological capacity relating to Population Equivalent (PE) for the existing WWTP is 270,000. The existing Waterbeach WRC PE is currently 6,500 PE and is nearing capacity due to the growth of the first phase of the Waterbeach New Town. A final allowance for Waterbeach (which is made up of the combined existing flows that go to the Waterbeach WRC and the new flows for the new occupants of the Waterbeach New Town) of an overall 30,000 PE will be accounted for in the 2024 expansion to 300,000 PE total for the proposed WWTP relocation. All of the other surrounding WWTP's PE capacity does not effect the proposed development as it is only the sludge from those WWTP's that will be delivered to the proposed WWTP's sludge treatment centre (STC), as is current practi The proposed WWTP's STC will have a capacity of 16,000tds/yr, to accommodate the new WWTP's sludge and the current imports.

ExQ1	Question to	Question	Response
			It is important to point out that the relocation project provides the equivalent capacity as the existing WWTP plus Waterbeach allowance. Growth requirements beyond that will be funded and managed under the normal OFWAT regulated requirements. To enable that, space to approximately double the existing treatment elements has been included inside the Rotunda earth bank. The design capacity of the Proposed WWTP of 300,000PE aligns with the Greater Cambridge Local Plan (August 2021) growth figures to 2041.
21.4	Applicant	**Response to CCoC RR** Please provide a detailed response to the water resources comments contained within the RR from CCoC [RR-001] (section 14).	The Applicant has provided detailed responses to the Relevant representation CCoC [RR-001] Section 14 Water Resources which is repeated below; 14.1 The Applicant acknowledges the LLFA requirement for the development to incorporate safe dry access and egress arrangements under flood conditions, as well as the need for flood evacuation plans. 14.2 The Applicant continues to discuss points raised in the Relevant Representations in relation to the Flood Risk Assessment and Drainage Strategy conclusions and this is reflected in the Statement of Common Ground with CCoC and in the Protective Provisions sought to be agreed with the Lead Local Flood Authority 14.3 Requirement 15 specifies that a detailed drainage strategy for each phase setting out the permanent drainage measures to be provided as part of that phase has been submitted to and approved in writing by the relevant planning authority. The detailed drainage strategy must accord with the measures set out in the drainage strategy [**APP-162**] in so far as they apply to the works in the relevant phase. Through this approval process, the Applicant would provide the LLFA the necessary calculations need to show the volume of groundwater accounted for in the Surface Water Drainage Design The Applicant therefore considers that Requirement 15 of the draft DCO and the approval of the detailed drainage design addresses this comment. 14.4 The Applicant confirms that this refers to passing collected surface water either in the IED permitted area or other areas where spillages or contamination may occur into the waste water treatment works and there is no segregated surface water drainage treatment facility. The anticipated returned flows to the WWTP have been allowed for in the calculations up to 50/s. The WWTP will not be treating the storm flows through the WWTP at this time as they will be treated in the storm system at that time until the storm event finishes, at this point the storm flows will then be returned to the WWTP for forward treatment 14.5 The Applicant has reviewed Chapter 20 (App Doc Ref 5.2.20) [APP-052] and cannot find the information the LLFA response refers to regarding the 20Ha and drained areas. The Applicant believes the LLFA intended to refer to the Drainage Strategy [APP-162 table 4-1] and will answer on that basis. In Table 4.1 the total area of the treatment works (Area 1) is given as 19.6ha; this area is further broken down into uncontaminated areas (Areas 2, 3 and 7) and contaminated areas (Areas 4, 5 and 6). The Areas (3 and 7) total 12.3ha and are discussed in further detail in paragraph 4.3, along with methods of estimating attenuation volumes, presented using two different methods (Models 1 and 2), in paragraphs 4.4 and 4.5. The estimation of greenfield runoff rates is presented in paragraph 4.6, and is based on the complete WWTP site area of 20ha (rounded up from the 19.6ha of Area 1) to represent the greenfield status for the current use of the site as agricultural farmed land. Please note that this is a 'Drainage Strategy' document and requires (as stated in paragraph 4.6.1) "further discussion and agreement with the Lead Local Flood Authority (LLFA) as part of the detailed design development. If this reference is in fact incorrect then could the LLFA please provide more information on the location and reference where this information is located so we can respond in full 14.6 The Drainage Strategy (Appendix 20.12) [APP-162] includes references to Rainwater Harvesting (RWH) in paragraphs 3.1.2, 4.1.5, 4.8.3. As the RWH storage facility may be full, it is confirmed that full provision will be made to accommodate all of the overflow (from the RWH system) to the drainage system and that the RWH overflow will not be treated as attenuation storage. This is set out (in paragraph 4.8.3, bullet point 'G12 -Discharge of Clean Water') which confirms that any overflow from the RWH system will be diverted to the main drainage system for the site. 14.7 The Applicant refers to the response to point 14.3 above and the detailed design phase and associated approval process related to Requirement 15.

ExQ1	Question to	Question	Response
			14.8 The Applicant refers to the response to point 14.3 above and the detailed design phase and associated approval process related to Requirement 15. A detailed site drainage plan would be prepared and provided to the LLFA as part of this approval process. 14.9 The Applicant refers to the response to point 14.3 above and the detailed design phase and associated approval process related to Requirement 15. Detailed volumetric calculations would be provided to the LLFA as part of this approval process.
21.5	Applicant NE, EA	**WINEP guidance** To what extent has the water industry national environment programme (WINEP) guidance (DEFRA, 2022) influenced the Proposed Development and what effect does it have on the assessment of this proposal?	The Applicant can confirm that neither the current Cambridge WRC or the Proposed Development form part of the current WINEP list. The proposed permit requirements for the Proposed Development aim to meet the ambitions and objectives of the WINEP programme.
21.6	Applicant	**Private drinking water sources** ES Chapter 20 Water Resources [AS-040] describes the potential impact on two private drinking water sources from construction activity as 'slight adverse, not significant'. a) Has monitoring of water quality in these water sources been proposed and if so where is it secured? b) Are there any other private water sources which could be impacted as a result of the Proposed Development? c) How can the ExA have confidence that the proposed no-derogation agreements would be agreed and secured with the owners of the private groundwater sources if required? d) Who would determine if a no-derogation agreement was necessary?	The Applicant acknowledges the comments and can confirm that; a) Monitoring of water quality has not been proposed in these water sources as water quality should not be affected by construction dewatering. Groundwater will be drawn towards the dewatering locations and should prevent the movement of any potential contaminants in groundwater towards the sources. Groundwater levels will, however, be monitored to check that dewatering is not affecting the quantity of the groundwater supply and amount that can be abstracted from the sources. This is included in the Outline Water Quality Monitoring Plan (App Doc Ref 5.4.20.3), and is secured through Requirement 22 of the draft DCO (App Doc Ref 2.1) [**AS-139**]. A draft Outline Water Quality Management Plan has been agreed in principle with the Environment Agency, and will be submitted at Deadline 1. The final version of the plan, following approval from the Environment Agency, will be submitted at Deadline 2. Table 5-2 of ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**] explains that the no derogation agreement will be secured within the Community Liaison Plan (CLP) (App Doc Ref 7.8) [**AS-132**], which is secured through Requirement 9(1) of the draft DCO (App Doc Ref 2.1) [**AS-139**]. b) Paragraphs 3.1.62 to 3.1.68 of ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**] discusses all licences and deregulated abstractions in the study area, and identifies only two private water sources that might be affected by the Proposed Development. No other private water supplies sources would be affected. c) The Environment Agency has requested these agreements with private water supply users to address the risk of the Applicant contaminating the supply. It is a commitment from the Applicant, via agreement, that it will not derogate from its duty to supply potable water. It benefits the owner and therefore the Applicant expects the owners to enter into the agreements. d) Section 4.1 of ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**] recommends a no-derogation agreement at two private water sources due to potential temporary construction effects on these water supplies. As outlined in item c) above, such an agreement benefits the owners of the private sources, and therefore the Applicant expects the owners to enter into the agreements.
21.7	Applicant	**Private drinking water sources** What action plan is proposed in the Water Quality Management Plan(s) or Pollution Incident Control Plan to warn users of the private wells in the event of a spillage potentially contaminating groundwater, either during construction or operation?	Either during construction or operation the two residencies with private drinking water sources will be notified by personal contact and by letter within 12 hours.
21.8	EA	**Mitigation** Is the mitigation proposed to limit potential water pollution of the Black Ditch and Quy Fen sufficient?	
21.9	EA	**Assessment** Does the ES adequately consider the influence of the additional transfer of Waterbeach effluent on the Dry Weather Flow (DWF) effluent return to the River Cam?	
21.10	EA, CCoC	**Monitoring and mitigation** NE advises that this groundwater-dependent site is included in the groundwater monitoring and mitigation strategy, because ES Chapter	

ExQ1	Question to	Question	Response
		20 [AS-040] indicates the potential for impacts on water levels at Wilbraham Fen SSSI during the dewatering phase. Is this necessary in your view?	
21.11	Applicant, NE	**Update following meeting** Please provide an update regarding the meeting referenced in the RR from NE [RR-015] regarding hydrology.	The Applicant organised a meeting with the Environment Agency and Natural England in August 2023 to discuss proposals for water and groundwater protection and monitoring. It was agreed that the Applicant would provide an Outline Water Quality Monitoring Plan, which would be reviewed and agreed with the Environment Agency. A further meeting was held with the Environment Agency on in October 2023 to agree this document and incorporate comments from the Environment Agency. A draft Outline Water Quality Management Plan has been agreed in principle with the Environment Agency, and will be submitted at Deadline 1. The final version of the plan, following approval from the Environment Agency, will be submitted at Deadline 2.
21.12	The EA	**Review of hydraulic modelling** Has the EA reviewed the hydraulic modelling undertaken by the Applicant as part of the FRA, and does the EA have comments on this?	
21.13	Applicant	**Assessment** Regarding the preliminary risk assessment [AS-089], why does the conceptual site model and preliminary qualitative risk assessment (PRA) make no reference to the Waterbeach Water Recycling Centre (WRC)? Why was there no testing of groundwater within the Waterbeach WRC for contaminants?	In respect of the omission of the Waterbeach Recycling Centre, the Applicant has since provided the additional information in ES Appendix 14.1 Preliminary Risk Assessment (App Doc Ref 5.4.14.1) [**AS-089**]. Waterbeach Recycling Centre is added as a potential contamination source in section 5.3.5. The Waterbeach WRC was assessed in the preliminary risk assessment but not investigated as part of the project ground investigation There are no below ground works at the Waterbeach WRC associated with the Proposed Development and no additional risk to receptors (human health or groundwater) are anticipated with the use of the site for construction purposes. Risks to construction personnel would be controlled through the Construction Design and Management Regulations (CDM) 2015. This site is managed under an existing Environmental Permit and should any changes to the site occur outside of the scope of the Proposed Development then this will be managed through the Environmental Permitting Regulations.
21.14	Applicant	**Assessment** Regarding the preliminary risk assessment [AS-089], should the ENVIROCHECK cover all of the area within the Order Limits as suggested by the EA in its RR [RR-013]? Why, why not?	Additional submissions have been made in response to the Environment Agency's Relevant Representation [**RR-013**] in respect of legibility of contamination summaries and provision of factual report data from all ground investigations across the Proposed Development. The Envirocheck report provided is for the existing Cambridge WWTP. Envirocheck reports were procured and reviewed for the remainder of the Proposed Development but not appended to the PRA. (5.4.14.1). The Applicant has updated the Preliminary Risk Assessment Appendices to include all EnviroCheck reports and is provided at Deadline 1.
21.15	Applicant	**Assessment** Please provide further clarification on the magnitudes of impacts to groundwater from Cr III as referenced by the EA [RR-013].	The Applicant notes the comment and can confirm that: Chromium (Cr) III (the trivalent form of chromium) was found at high concentrations in groundwater monitored as part of the 2021 ground investigation. This was principally located in the central and southwestern extent of the Proposed Development although some Cr III was also identified to the east close to the River Cam at the location of the transfer tunnel. Similarly, high concentrations of Cr III were also recorded in surface water sampling of Quy Fen main pond, Allicky Farm Pond and the Black ditch. No significantly elevated Cr III in soils or soil leachate was identified by the investigation. No hexavalent chromium (Cr VI) was identified in groundwater or surface water and very low concentration of leachable Cr VI were recorded in three soil samples analysed (maximum of 0.65ug/l). Refer to Table 3-8, Table 3-9, Table 3-10, Section 3.1.30 to 3.1.37 of the ES Chapter 14: Land Quality (App Doc Ref 5.2.14) [**AS-032**] and ES Appendix 14.3: Geoenvironmental Results – proposed WWTP (App Doc Ref 5.4.14.3) [**AS-091**]. It is interpreted that the source of the chromium is likely to relate to agricultural practices such as sewage sludge spreading or use of fertilizers on land. The impact assessment in the land quality section considers the change in risk from existing contamination including chromium) as the Proposed Development is constructed. The risks were judged to remain the same between baseline and construction. Therefore, the

ExQ1	Question to	Question	Response
			significance of effect was assessed as negligible, which is not significant (section 4.2.33 to 4.3.39 of ES Chapter 14: Land Quality (App Doc Ref 5.2.14) [**AS-032**]). A draft Outline Water Quality Management Plan (App Doc Ref 5.4.20.13) has been agreed in principle with the Environment Agency, and will be submitted at Deadline 1. The final version of the plan, following approval from the Environment Agency, will be submitted at Deadline 2. Further assessment of groundwater and surface water quality will be undertaken during both the pre-construction and construction phase. This will include further chromium testing. This will be undertaken at locations previously identified to have recorded high levels of chromium in groundwater (BH_STW_023 and BH_STW_024) and those where this was absent (BH_STW_001, BH_STW_025); as well as the following surface water monitoring points Black Ditch, Allicky Farm Pond, The cut and Stow-cum-Quy Fen SSSI).
21.16	EA	**Review of ConSim models** Has the EA reviewed the digital ConSim models for the contaminant transport modelling assessment and does the EA have comments on this?	
21.17	Applicant	**Monitoring** The EA and NE propose that operational phase groundwater quality monitoring for the wider scheme should be carried out so that any unacceptable impacts can be detected (such as impacts on SSSIs) and appropriate mitigation measures implemented. NE also advise that monitoring of the water quality of the Black Ditch, which is hydrologically connected to Stow-cum-Quy Fen SSSI, should be carried out in addition to water level monitoring during construction and operation. Is this necessary in your view – why / why not?	As discussed in 21.11 above, a draft Outline Water Quality Management Plan (App Doc Ref 5.4.20.13) has been agreed in principle with the Environment Agency, which will be submitted at Deadline 1. The final version of the plan, following approval from the Environment Agency, will be submitted at Deadline 2. This includes proposed long-term operational phase groundwater monitoring of seven boreholes within the close vicinity of the proposed WWTP, and the attenuation pond receiving discharge from the drainage network at the proposed WWTW. The boreholes and attenuation pond will provide an early indication of any groundwater quality issues. Monitoring of water quality is not proposed in Black Ditch. The boreholes and pond associated with the WWTW should give a clearer and earlier indication of any contamination associated specifically with the WWTW. As indicated in Para 3.1.3 and 3.1.6 of ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**], a section of Black Ditch is located along, and just within, the boundary of Stow-cum-Quy Fen. However, Black Ditch can only discharge into ponds in the SSSI, and across some of the surrounding grassland, as a result of over-bank flow at times when water levels and flows are very high. At these times, flows should almost entirely comprise surface water runoff, with only very minor contributions from any groundwater in the catchment.
21.18	Applicant	**Mitigation** The EA raise particular concerns regarding potential leakages from infrastructure that would be used for underground or sub-water table transmission of pollutants. Please detail how this would be avoided.	The following measures will be employed by the Applicant to avoid potential leakage from the proposed infrastructure utilised for the transmission of pollutants underground: Design: • As part of the detailed design careful consideration will be given to the selection of material and design specification to ensure that the proposed infrastructure will be appropriate for the operating pressure regime, the characteristics of the fluid to be transmitted, as well as the existing soil, backfill conditions and proposed installation technique. Design risk assessments will be carried out to identify where secondary containment measures are required to comply with environmental permitting requirements . • The design of the sludge treatment centre will follow the conditions for industrial emissions (including to water and soil) as set out in the environmental permit issued for the sludge treatment plant under the Industrial Emissions Directive (IED) as stated in Appendix A of the Consents and Other Permits Register (Doc 7.1) [AS-123). • A separate (and self contained) drainage system will be constructed to collect potentially contaminated runoff (including spillages and/or leakage) from the impermeable areas of the proposed STC and return it to the inlet works for treatment as explained in paragraph 3.2.2 of the Drainage Strategy (Doc 5.4.20.12) [APP-162]. In addition, surface water runoff (including spillages or leakage) from areas of the proposed WWTP that may be contaminated will also be collected in closed drainage systems and returned to the inlet works for treatment as explained in paragraph 3.2.5 of the Drainage Strategy (Doc 5.4.20.12) [APP-162]. Construction: • During construction of the infrastructure appropriate tests will be carried out to confirm the integrity of the completed infrastructure and ensure it has been constructed in compliance with the specified requirements. The construction process, and associated integrity tests for water containing infrastructure, includes the requirement to comply with codes of practice and specifications such as the 'Civil Engineering Specification for the Water Industry' (CESWI, currently the 7th Edition) published by the WRc (Water Research Centre). Operation:

ExQ1	Question to	Question	Response
			• Regular inspections and maintenance of the infrastructure will be carried out in accordance with the Operation and Maintenance Manual. In addition, monitoring of pressurised pipelines will be carried out to help detect potential leakage issues early, ensuring prompt repairs and minimizing environmental impact.
21.19	Applicant	**Water consumption** The EA expects water efficiency standards and water consumption estimates to be provided to them. Please confirm if and when this will be completed.	The water consumption figures are set out in Chapter 2: Project Description, Table 2-20: Estimated water consumption (m3/day). Although the table presents water consumption throughout construction, the Existing WWTP potable water consumption figures are also reported, namely 286 m^3/d. The majority of this figure represents process requirements, but it also includes a minor contribution associated with operatives' welfare requirements. The potable water connection negotiated with Cambridge Water represents a maximum instantaneous capacity of 75 l/s fire-fighting consideration, or 30l/s without, and an average daily consumption of approximately 325 m^3/d. *The error in Table 2-20 (448 m3/d vs 325 m3/d) will be corrected.* The above figures exclude other process water uses, including various effluent streams and blow-downs, filtered final effluent, filtered and disinfected final effluent, and condensates – all together totalling more than 200l/s. The Applicant can further confirm that all buildings will be designed to achieve BREEAM excellence performance levels and a 'water conservation strategy will be submitted during detailed design.
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 relocation design has been aligned with the Existing WWTP capacity and the known growth forecast to 2041 from the Greater Cambridge Local Plan (August 2021), including Waterbeach. It is highly unlikely that the plant will constrain future housing growth, as future growth (beyond the numbers included in the current best information to 2041) will be dealt with in the same mechanism as other WWTP facilities' growth requirements – under the regulated process managed and funded through the regulator, OFWAT. The site has adequate space to accommodate further growth beyond these numbers and its associated additional investment, should it become required before or after 2041.
21.21	Applicant	**Assessment** Please explain how the assessments in the ES have addressed the potential for further extension in capacity beyond 2041 to accommodate for anticipated flows into the 2080s and 2090s?	Section 2.4 of ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**] outlines the temporal scope of the assessment. Operational effects for water resources are considered from the year 2028 to the year 2050. The effects of further expansions in capacity required would be assessed separately when those proposals are brought forward as part of committed planning applications.
21.22	Applicant	**Benefits** A reported benefit of the Proposed Development would be greater resilience and improved storm management, reducing storm overflows and combined sewer overflows – could the existing WWTPs be updated to achieve the same or similar level of benefit? If not, why not?	Two of the key differences in the Proposed WWTP compared to the existing WWTP is the increase in treatment capacity (1,200l/s to 1,840l/s) and the addition of the 2.3km transfer tunnel between the Existing WWTP and the Proposed Development that allows increased flow management and attenuation compared to the existing WWTP. Although the Existing WWTP can increase its treatment capacity with significant investment and modifications, the existing network to the Existing WWTP cannot be adapted to provide the same attenuation as can be achieved through the 2.3km transfer tunnel.
21.23	Applicant	**Benefits** Could the existing WWTPs be updated to reduce the concentration in final treated effluent discharges of phosphorus, ammonia, total suspended solids and biological oxygen demand (BOD) to achieve similar benefits to the proposed WWTP? If not, why not?	The Existing WWTP could be be adapted to achieve the same effluent quality as the Proposed Development. However, significant investment and modifications would be required. It has to be pointed out that the implications to improve effluent quality would also impact on the sludge treatment center (STC) requirement as additional sludge would be generated and require treatment. Additional to the investment to the Existing WWTP required, significant additional investment and improvements to the Existing WWTP STC would also be necessary. The noise, carbon, etc. impacts to remove and replace assets to facilitate the same discharge benefits would be negative benefits in other areas. Additionally, due to the attenuation that can be achieved between the Existing WWTP and the Proposed WWTP, there will be a discharge benefit associated with reduced storm discharges from the Proposed WWTP. This cannot be achieved at the Existing WWTP as the existing network cannot be adapted to provide the same attenuation as the 2.3km transfer tunnel.
21.24	Applicant	**Abnormal operating conditions** How often are abnormal operating conditions likely to occur at the proposed WWTP – data from the operation of the existing WWTP would be useful in this regard. How often do stormwater discharge events happen at the existing WWTP?	The Applicant has set out in APP-160 5.4.20.10 ES Volume 4 Chapter 20 Appendix 20.10 the Storm model report which contains details of the stormwater discharge events information at the Existing WWTP, earlier used to verify the model and then use the model the anticipated future spill frequencies. By nature of the description, abnormal operating conditions are those that cannot be predicted or quantified. As such it is impossible to provide likelihoods. To provide confidence, designs are created and then assessed for suitability and risk using the Environment Agency's rainfall data set for modelling storm overflows and sewer flooding risks - existing against proposed - to ensure no deterioration is expected. This methodology is considered BAT (best available technique) and results were discussed and accepted by the EA throughout design.

ExQ1	Question to	Question	Response
			Historic storm spills are reported by the Environment Agency and results displayed on the Anglian Water website (link: https://www.anglianwater.co.uk/environment/storm-overflows/improving-rivers-and-coastlines/) This storm discharge information is updated annually.
21.25	Applicant	Monitoring Para 4.1.105 of ES Chapter 20 [AS-040] suggests that the CoCP Part A [APP-068] details that monitoring of boreholes would be required and the scope of which would need to be agreed with relevant stakeholders. a) Please direct the ExA to where this is contained within the CoCP Part A – para 7.5.2 suggests that monitoring would take place, but not that the scope would be agreed with relevant stakeholders. b) What mechanisms would be put in place if the monitoring shows unacceptable levels of dewatering to the West Melbury Marly Chalk Formation? c) What level of dewatering would be considered unacceptable / result in a trigger for action to be taken? Please detail the locations at which piezometers were installed in boreholes to allow groundwater levels to be monitored.	a) As discussed in 21.11 above, the scope of monitoring was discussed with the Environment Agency and Natural England on the 22nd August 2023, with the action that the Applicant prepares an Outline Water Quality Management Plan. A draft Outline Water Quality Management Plan has been agreed in principle with the Environment Agency and will be submitted at Deadline 1. The final version of the plan, following approval from the Environment Agency, will be submitted at Deadline 2.. b) As specified in Table 5-1 of ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**], management responses may include but not be limited to reducing or ceasing dewatering or amending dewatering points and would be agreed through consultation with the Environment Agency. Implementation of mitigation measures in the Outline Water Quality Management Plan is secured through Requirement 22 of the draft DCO (App Doc Ref 2.1) [**AS-139**]. c) The CoCP Part A (Doc 5.4.2.1) [APP-068] includes provisions, in 7.5.11, that are also to be put into place in relation to groundwater dewatering activities, including that: "the discharge rates and location of discharge points will be agreed with the Environment Agency or another relevant body as required". The level of dewatering will depend on the agreement with the Environment Agency. Dewatering is a controlled activity. If the level of dewatering agreed in the permit is exceeded this would be considered unacceptable and result in a trigger for action to be taken. Groundwater levels vary seasonally and from year to year, and also vary in different locations. As a result, it is not possible to set levels which would result in triggers for action prior to the start of construction. However, the dewatering process will be managed by permit and agreed with the Environment Agency. The permits sought are set out in the Consents and Permits Register (App Doc Ref 7.1) Groundwater level monitoring data collected prior to and during dewatering activities, together with interpretation of this data, will be shared with the Environment Agency as dewatering proceeds. If changes in practices are considered necessary by the Environment Agency to prevent excessive impacts on receptors, these changes would be agreed with the Environment Agency and implemented during dewatering. d) Locations of environmental monitoring boreholes will be provided in the Outline Water Quality Management Plan. A draft Outline Water Quality Management Plan has been agreed in principle with the Environment Agency, and will be submitted at Deadline 1. The final version of the plan, following approval from the Environment Agency, will be submitted at Deadline 2.
21.26	Applicant	**Monitoring** Where is the proposed monitoring detailed within para 4.1.113 of ES Chapter 20 [AS-040] secured?	Table 5-2 in ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**] states that monitoring will be secured within a monitoring plan. As discussed in 21.11 above, the scope of monitoring was discussed with the Environment Agency and Natural England on the 22nd Aug 2023, with the action that the Applicant will prepare an Outline Water Quality Management Plan. A draft Outline Water Quality Management Plan has been agreed in principle with the Environment Agency, and will be submitted at Deadline 1. The final version of the plan, following approval from the Environment Agency, will be submitted at Deadline 2.
21.27	Applicant	**Monitoring** CoCP Part A [APP-068] states that *5.14.3 Where possible land drains will be avoided. If this is not possible then these will be repaired. In localised areas where there is extensive land drainage, it may become necessary to install a Pre and Post works land drainage system in consultation with landowners, their tenants and/or land agents*. Repairs to drains should ensure that the functionality of the drain is equal to, or better than it was prior to commencement of works – this should be made clear in the CoCP Part A. What constitutes "extensive land drainage"? Please provide more information around this definition and the triggers for a pre and post works construction drainage system and how this would be agreed with landowners and their tenants and mechanisms to overcome this matter if not agreed by all parties.	The question refers to paragraph 5.14.3 of the CoCP Part A [APP-068] which is titled 'Land Drains'. The Applicant confirms that any 'repairs' to land drains will be carried out with the intention of restoring the functionality of the existing land drain to be as it was prior to commencement of works. The reference to 'extensive land drainage' simply refers to areas where: • either the existing drainage system cannot be avoided during construction • and/or areas where repairs may not be sufficient to maintain adequate drainage (that is at least equivalent to the existing drainage arrangement) The trigger regarding pre and post construction work are considered as follows: • **Pre construction work:** this is the preparation(s) that must be carried out in advance of a construction activity that may encounter existing land drainage pipe/systems; an example of this is prior to trench excavation across a field(s) to enable a pipeline(s) to be laid. • **Post construction work:** this applies to the restoration(s) that must be carried out after a construction activity that may have encountered existing land drainage pipes/systems; an example of this is after a pipe trench across a field(s) is backfilled. The landowners and their tenants will be provided with an opportunity to consult and agree with the Applicant what drainage work is to be carried out. The details of this agreement will be documented is a Pre-start document before contractors enter the land.

ExQ1	Question to	Question	Response
21.28	Applicant	**Assessment** The impacts from groundwater flows and levels for the proposed WWTP due to dewatering in the West Melbury Marly Chalk Formation (p89 of ES Chapter 20 [AS-040] onwards) does not appear to reference the pile foundations which go much deeper than the stated depths of the proposed WWTP (e.g. storm water tank foundation depth parameter is -15.5m AOD). Are the foundations of the Proposed Development likely to affect dewatering in the West Melbury Marly Chalk Formation and impact on groundwater?	The Applicant has set out in Table 2-5 in ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**] the depths of below ground structures including piling. The Terminal Pumping station (TPS) is the deepest below ground structure, fully penetrating the West Melbury Marly Chalk Formation (and extending into the Gault Formation), and this has been taken into account in the dewatering assessment of the West Melbury Marly Chalk Formation (see paragraphs 4.1.116 to 4.1.139 of ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**]). As discussed in paragraph 4.1.119 of ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**], no detailed separate assessment has been carried out for dewatering associated with foundations and other below-ground structures, which are not expected to fully penetrate the West Melbury Marly Chalk Formation. The dewatering associated with these structures will take place intermittently over an extended period during the construction programme, spreading out the impact on local groundwater levels. No significant impact on dewatering quantities would be expected from pile foundations below the base of excavations.
21.29	Applicant	**Clarification** The impacts on water resources set out under Testing and commissioning of proposed WWTP – groundwater quality [AS-040], para 4.1.82 states that *Tests will be undertaken on tanks and pipes following installation to ensure they will hold water at the design pressure and not leak. The source of this water will be agreed as part of a commissioning plan. The source may comprise final effluent from the existing Cambridge WWTP or from the existing Waterbeach WRC, conveyed to the proposed WWTP via the new waste water transfer tunnel or Waterbeach pipeline.* However, the Outline Commissioning Plan [AS-053] (section 3) does not reference the use of final effluent from the existing Waterbeach WRC and suggests that secondary effluent could be used from the existing WWTP. Furthermore, it does not set out that the source needs to be agreed as part of the detailed commissioning plan. Please provide clarity on this matter.	Testing and commissioning of proposed WWTP – groundwater quality 4.1.181 This assessment considers the impact to groundwater quality due to wet testing of tanks and pipes. 4.1.182 Tests will be undertaken on tanks and pipes following installation to ensure they will hold water at the design pressure and not leak. The source of this water will be agreed as part of a commissioning plan. The source may comprise final effluent from the existing Cambridge WWTP or from the existing Waterbeach WRC, conveyed to the proposed WWTP via the new waste water transfer tunnel or Waterbeach pipeline. 4.1.183 A temporary lagoon may be constructed in the vicinity of the proposed WWTP to hold the water for testing. The lagoon will be lined to prevent leakage to the underlying aquifer in the West Melbury Marly Chalk Formation. Cambridge Waste Water Treatment Relocation Project Chapter 20: Water resources 99 4.1.184 It is anticipated that a permit to discharge the final effluent used for testing into local watercourses will be obtained, to minimise land discharge as part of the commissioning plan. It is therefore assumed that any discharge will be at an approved location. Any impacts to groundwater quality, if discharged to ground, would be subject to control measures secured by an environmental permit. Outline commissioning plan to be updated to ensure it is in line with ES Chapter 20 (5.2.20).
21.30	EA	**Permitting and benefits** Do you consider the assumed indicative discharge consent limits for water quality determinants contained within Table 4-1 of ES Chapter 20 [AS-040] to be reasonable and realistic? How likely is it that the extent of the suggested benefits could be reduced during the permitting process?	
21.31	Applicant	**Mitigation** Para 4.2.15 of ES Chapter 20 [AS-040] provides secondary mitigation measures to reduce impacts of the outfall on scour during operation and notably during maximum stormwater discharges. Please confirm how mitigation by design refinement suggested by the Outfall CFD Report [APP-157] at the detailed design stage would be secured through the dDCO?	The Outfall CFD Report [APP-157] contains recommendations (in Section 6) that set out the further steps that are intended to be taken, to refine and finalise the hydraulics of the outfall structure, during the next phase of the design process. The current CFD model provides a detailed digital model of the outfall structure and river interface that can be used to improve the flow conditions by altering the geometry (of the structure) and control features (such as steps, weirs and valves). The output from the CFD model shows local variations in the flow path and provides details such as flow velocity. The variations in flow velocity can be studied to reduce the impacts of scour. As stated in the CFD report, the following aspects are recommended for further CFD modelling to determine if benefits (such as reduced local flow velocity) can be achieved by increasing the: • depth of the outfall bay • submergence of the outfall ports • port area for the storm outfalls An example of the use of the CFD model to refine the storm outlets during detailed design follows: The CFD report currently only considers the use of one type of valve for the storm outlets (Tideflex Checkmate valves). During detailed design other outlet arrangements can be considered including: • using various flap gates arrangements (and materials), from specialist suppliers, with larger openings to increase the outlet area

ExQ1	Question to	Question	Response
			using alternative inline non return valves (such as the WaStop valve) that may provide improved performance (to the Tideflex Checkmate valve).
21.32	Applicant	**Monitoring** Para 4.2.84 15 of ES Chapter 20 [AS-040] states that *It is unlikely that any impact would be evident in changes in groundwater levels in the area of the landscape masterplan, although monitoring of groundwater levels will continue throughout construction and into the operational period. The monitoring data will be assessed and compared with records for groundwater levels elsewhere in the aquifer during operation.* What is the purpose of this monitoring in relation to this matter and what would be a trigger to take action, and what would this action be?	Para 4.2.68 to 4.2.85 of ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**] considers the impact of proposed WWTP components (including below-ground structures, foundations, and areas of hardstanding) and drainage in the WWTP on groundwater conditions and aquifer recharge in the West Melbury Marly Chalk Formation underlying the WWTP. Para 4.2.78 15 of ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**] indicates that '*The impact resulting from the redirection of groundwater flows and shallower groundwater levels in the area of the proposed WWTP, together with potential changes to recharge, will have a negligible impact on aquifer conditions in the West Melbury Marly Chalk Formation*. *Any localised changes would have no impact on the status of the Principal aquifer of which the West Melbury Marly Chalk Formation forms a part*.' Therefore no mitigation has been proposed as the resulting effect on the aquifer is not significant. The monitoring within the landscape masterplan area will be undertaken to document the recovery of groundwater levels following dewatering during construction, and to compare the pre- and post-construction groundwater conditions. No actions should, however, be needed in relation to the Principal aquifer and, hence, the Applicant does not propose a trigger for action. Nonetheless, reporting of the groundwater level data and analysis of pre- and post-construction groundwater conditions would be shared with the Environment Agency. The Environment Agency could then discuss any concerns for changes in groundwater levels with the Applicant and whether any further actions were necessary, although, as already indicated, mitigation is not expected.
21.33	Applicant	**Benefits** Benefits on water quality: a) In terms of the beneficial impacts cited in ES Chapter 20 [AS-040], please confirm whether the improvements are in comparison to the use of the existing WWTP only, or are in comparison to the existing WWTP and Waterbeach WRC combined? b) In terms of the benefits cited, are these in comparison to the existing WWTP functioning as it is now (below capacity), or functioning at full capacity? c) In terms of the benefits cited, are these based on the proposed WWTP running at capacity under Phase 1 of the development, capacity under Phase 2 of the development, or with future population growth beyond this in mind? It is noted that this is explained for the impacts from operation of outfall under normal conditions on water quality, but not for other matters.	a) Comparisons are to the existing WWTP and Waterbeach WRC combined. The assessment of "Operation of outfall (normal conditions) – water quality" in paragraphs 4.2.19 to 4.2.35 of ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**] identifies that it compares the discharge and water quality consent limits for the existing WWTP, with the indicative limits for the Proposed Development, which include the contribution from Waterbeach. Both the existing and proposed WWTP have outfalls to the River Cam. Currently, effluent from Waterbeach WRC discharges to Bannold Drove Drain. Consideration of the cessation of Waterbeach WRC to water quality in the River Cam is provided in paragraph 4.4.26 of ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**]. b) The dry weather flow (DWF) limits (i.e maximum limits) in both cases are provided in Table 4-1 of ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**]. The comparison is with the existing WWTP functioning at the DWF limit. c) The DWF limits for the proposed WWTP are based on an indicative DWF of 55,000 m^3/d as shown in Table 4-1 Discharge consent limits: concentrations and DWF of ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**]. However, as further explained in paragraph 4.2.28, Phase 1 DWF is 53,862m^3/d and Phase 2 is 57,280m^3/d. Impacts on water quality under these conditions are assessed in paragraphs 4.2.28 to 4.2.35 of ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**].
21.34	Applicant	**Drainage Strategy** R15 of the dDCO [AS-139] requires a detailed drainage strategy be submitted for each phase of development, apart from the enabling phase. Why is a detailed drainage strategy not required for the enabling phase, given that enabling works include construction of development which could impact on surface water drainage e.g. construction of access, offices, land drainage works etc?	The drainage measures required to deal with surface (and ground) water during the enabling phase will be set out in the Construction Water Quality Management Plan as stated in the Code of Construction Practice (CoCP) : Part A General Requirements, Section 7.5 Water resources and flood risk (Doc 5.4.2.1) [AP-068]. The Construction Water Quality Management Plan will be prepared prior to commencement of the enabling phase as stated in the CoCP: Part A - paragraph 4.4.4 (Doc 5.4.2.1) [APP-068]. All appropriate approvals and consents from the relevant regulatory body or statutory undertaker for proposed construction works during the enabling phase which could affect any surface water or ground water resource will be obtained before construction commences as stated in the CoCP Part A - paragraph 7.5.6 (Doc 5.4.2.1) [APP-068]. The Code of Construction Practice: Part B Site Specific Measures (Doc 5.4.2.2) [AS-161] refers to site specific drainage measures for the construction phase in Section 3.
21.35	Applicant	**Assessment** Why have increased treated flows on combined sewer outflow not been modelled, particularly noting that stormwater discharge incidents have been modelled and that the benefits of the Proposed Development include fewer combined sewer overflow incidents?	There will be no CSO retained at the Existing WWTP and no new CSO included at the Proposed Development. There is one CSO in the Cambridge WWTP catchment, namely Riverside CSO. The existing network has been modelled for up to a 1:100 year storm event, plus 40% climate change allowance, to ensure "no deterioration in the catchment" as a result of the proposed tunnel extension and Proposed Development. This approach was agreed with the Environment Agency. This is set out in Chapter 2 Project Description, section 2.3 on storm management, as well as App Doc Ref 5.4.20.10 for the modelling report.

ExQ1	Question to	Question	Response
21.36	Applicant, EA	**Benefits** What weight can be offered to the suggested benefits of reduced Combined Sewer Overflows, if the impacts of the Proposed Development in this regard have not been modelled?	As highlighted in question 21.35 , Combined Sewer Overflows are not specifically relevant to the Proposed Development as no CSO retained at the Existing WWTP and no new CSO included at the Proposed Development. There is one CSO in the Cambridge WWTP catchment, namely Riverside CSO. The existing network has been modelled for up to a 1:100 year storm event, plus 40% climate change allowance, to ensure "no deterioration in the catchment" as a result of the proposed tunnel extension and Proposed Development. This approach was agreed with the Environment Agency. This is set out in the Chapter 2 Project Description, section 2.3 on storm management, as well as App Doc Ref 5.4.20.10 for the modelling report. Additionally, due to the attenuation that can be achieved between the Existing WWTP and the Proposed WWTP, there will be a benefit to river quality associated with reduced storm discharges from the Proposed WWTP. This cannot be achieved at the Existing WWTP as the existing network cannot be adapted to provide the same attenuation as the 2.3km transfer tunnel. Refer to App Doc Ref 5.4.20.10 for the modelling report.
21.37	Applicant	**Monitoring** Para 4.2.126 of ES Chapter 20 [AS-040] states *that During the operation of the proposed WWTP, water quality monitoring should be undertaken in the pond receiving the discharge from the sub-surface drainage network, the drain connected to Black Ditch which receives the discharge from the pond, and also Black Ditch*. The word "should" indicates that this may not happen. How can water quality monitoring therefore be assured and secured through the dDCO or environmental permitting?	As discussed in 21.11 above, the scope of monitoring was discussed with the Environment Agency and Natural England on the in August 2023, with the action that the Applicant prepares an Outline Water Quality Monitoring Plan. A draft Outline Water Quality Management Plan has been agreed in principle with the Environment Agency, and will be submitted at Deadline 1. The final version of the plan, following approval from the Environment Agency, will be submitted at Deadline 2. The Applicant has added a new Requirement 22 (Outline water quality monitoring plan). The purpose of this requirement is to make provision for reporting, investigating and remediating water contamination. Pursuant to Requirement 22 in the draft DCO, prior to the operation of the authorised development a detailed operational water quality monitoring plan must be submitted to and approved by the relevant planning authority. The detailed operational water quality monitoring plan must accord with the measures set out in the outline water quality monitoring plan and must incorporate measures to monitor water quality. Requirement 22(4) provides that the authorised development must be operated in accordance with the approved detailed operational water quality monitoring plan.
21.38	Applicant	**Monitoring** How would the monitoring measures set out on pages 137-138 of ES Chapter 20 [AS-040] be secured?	Monitoring measures will be secured by the Outline Water Quality Monitoring plan as discussed in 21.11 above. This is secured through requirement 22 of the dDCO.
21.39	Applicant	**Assessment** Please provide a detailed response to the EA's concerns [RR-013] regarding lack of assessment of the potential impact of increased flood levels on local flood risk from smaller magnitude flood events – the EA suggests that *The FRA needs to clearly show the locations of the areas of land where an increase in flood depths is shown in the modelling during different flood events.* If needed, please liaise with the EA on this matter to work towards a resolution.	The Applicant has discussed this with both the EA and NE at the meeting on 22 August 2023 and demonstrated that for the small magnitude 1 in 2-year event, where stage levels increased by 22mm, flood waters are maintained in channel. No downstream receptors are impacted. This response has been provided to RR-013 Issue 1.2. The position of the FRA is also addressed in section 4 of the EA's and the Applicant's Statement of Common Ground. As noted in 21.2 above, the Flood Risk Assessment (App Doc Ref 5.4.20.1) [APP-151] will be updated following revised hydraulic modelling and further engagement with The Environment Agency for Deadline 3.
21.40	EA	**Assessment - clarification** Please provide more detail regarding the following statement within [RR-013]: *Insufficient preliminary assessment and analysis. There is further clarification, justification and information that needs to be supplied to demonstrate that there will be no detrimental impact on groundwater*. Please confirm what additional work needs to be carried out in your view by the Applicant.	
21.41	EA	**Water supply** Within your RR [RR-013], it is stated that *The proposed new facility is replacing the existing works so no additional demand to the water supply will be made. We are expecting water efficiency standards and water consumption estimates to be provided to us.* However, the capacity of the proposed WWTP is to be increased to meet population demands as set out within the ES. Does this affect your comments regarding demands on the water supply and in relation to the conclusions drawn	

ExQ1	Question to	Question	Response
		by the Applicant regarding the impacts of the development in relation to Water Resources?	
21.42	EA	**Water Framework Directive** The Applicant states within the Water Framework Directive Assessment Report [APP-153] that as a result of the Proposed Development, the phosphate status for the River Cam is likely to change from 'poor' to 'moderate', which meets with the 2027 WFD objective. a) To what extent do you think this is likely and to what is the significance of this benefit to the application? b) Do you consider that the Proposed Development meets the requirements of the Water Framework Directive and its daughter directives, including those on priority substances and groundwater?	
21.43	Applicant, EA	**Monitoring** Within [RR-013], the EA recommends monitoring of Wilbraham Fen SSSI during the de-watering-phase. The Applicant states that there would be a negligible impact on the SSSI and does not propose monitoring. Please discuss this matter further to reach a conclusion and update the ExA.	The Applicant's response to RR-013 details the reasons why monitoring of Wilbraham Fen is not recommended. Monitoring of Wilbraham Fen was further discussed with the Environment Agency on 24 October 2023 as part of the discussion about the Outline Water Quality Management Plan (App Doc Ref 5.4.20.13). The Outline Water Quality Management Plan (discussed in 21.11 above), sets out will also detail why no new monitoring borehole is proposed at this location. The reasons can be summarised as follows: • The estimated maximum impact of dewatering at Wilbraham Fens SSSI, during construction of the Terminal Pumping Station within the proposed WWTP, is less than 1mm. However, Wilbraham Fens SSSI is located on the opposite bank of Quy Water to the proposed WWTP. As a result, any impact of dewatering abstraction may well be assimilated in minor temporary changes to flow in Quy Water, rather than extending further out into the West Melbury Marly Chalk Formation beneath the SSSI. • Groundwater levels have been monitored previously in Wilbraham Fens at TL55_177, located near the western boundary of the SSSI (Hydrology Data Explorer - Station). Despite anomalies in the groundwater level records, the data for TL55_177 indicates a general overall variation of 0.5m or more in groundwater levels in each year. As a result of this regular annual variation, any impact on groundwater levels of 1mm would be undetectable at the distance of Wilbraham Fens from the proposed WWTP (>2km).
21.44	Applicant	**Surface water drainage strategy** CCoC as the Local Lead Flood Authority [RR-001] request additional details and clarification regarding the proposed surface water drainage strategy. Please liaise with the County Council on this matter and provide an update, with any relevant additional information, to the ExA.	A copy of the drainage strategy submitted with the DCO Application has been shared with CCoC and the Lead Local Flood Authority and their position incorporated into the Statement of Common Ground.
21.45	Applicant	**Flood risk** The CoCP Part A [APP-068] states that construction compounds and storage areas would be located in flood zone 1 *where feasible*. Based on the sequential approach, construction compounds should ideally be secured in Flood Zone 1 with no fluvial flood risk to access – please confirm why this is not secured in full, or preferably amend the document accordingly.	The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. The NPPF does not explicitly cover temporary works and therefore a pragmatic approach is required in terms of temporary construction compounds and storage areas. As stated in the CoCP Part A, where possible construction compounds and storage areas would be located within Flood Zone 1. For construction of the Waterbeach river crossing, and the outfall, a waterside location is required for temporary compounds and storage areas. It would be impractical for construction purposes to locate these temporary compounds and storage areas within Flood Zone 1, as they need to be next to the river. Waterside compounds and storage areas would be temporary in nature, and will include flood resilience measures, as outlined in Section 7.5 of the CoCP Part A (App Doc Ref 5.4.2.1). Staff working on site would be subject to a flood warning and evacuation plan. .
21.46	Applicant	**Flood risk** Within the FRA [APP-151], the proposed WWTP has been classified as 'less vulnerable' development. Annex 3 of the NPPF confirms that sewage treatment works are less vulnerable development, if adequate measures to control pollution and manage sewage during flooding events are in place. Please set out the measures to control pollution and manage sewage during flood events, to ensure compliance with Annex 3 of the NPPF.	It is recognised that flood events can result in pollution through: i) inundation of the treatment works leading to mingling of flood water and contaminants such as untreated waste water ii) inundation affecting the normal function of the waste water treatment works leading to impaired quality of treated effluent iii) sudden increases in inflows to the waste water treatment works leading to impairment of normal function as treatment capacity is overwhelmed and potential use of overflows In relation to i) the risk of inundation of the proposed WWTP is extremely low as the proposed WWTP is in flood zone 1 above the 100yr plus climate change flood level, and therefore not at risk from inundation during a fluvial flood event. This avoids the risk of potential

ExQ1	Question to	Question	Response
			flood water contamination through sewage mixing with fluvial flood water. In relation to point ii) this also avoids the risk of fluvial flooding affecting the normal operation of the treatment processes. The Flood Risk Assessment (App Doc Ref 5.4.20.1) [APP-151] identifies the risk of surface water flooding (including the potential emergence of groundwater which could contribute to surface water). In relation to point i) above the Applicant refers to the Drainage Strategy (App Doc Ref 5.4.20.12) [APP-162]. which requires the system to be designed to contain the 100yr plus climate change event. This design minimises the likelihood of surface flood water mixing with untreated sewage. In addition, the drainage design presented in Drainage Design Strategy (App Doc Ref 5.4.20.12) [APP-162] incorporates a segregated system such that surface water runoff from potentially contamination areas is returned to the works for treatment. Furthermore, the design includes SuDS for surface water runoff collected from uncontaminated areas of the proposed WWTP. In relation to item iii) above, the design has incorporated storm storage approach that provides an improved capacity as discussed in the Storm Model Report (App Doc Ref 5.4.20.10) [APP-160]. This means flows are stored and then routed through the works for treatment once the flood event has subsided and reduces the need for overflows. In relation to events that can affect water treatment the Applicant refers to Table 5-2 of ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**], impacts of final effluent discharge on water quality for the River Cam is managed through: • design of the process technology and storage so that operation is within emission limits (stricter consented limits for treated effluent and greater storm storage than the existing Cambridge WWTP) to achieve no deterioration within the River Cam • design of the proposed WWTP that allows for future process changes to accommodate future emission limit changes • design of storm storage volumes and flow rates to meet regulatory requirements; • inclusion of capacity within the Proposed Development to adapt to future changes in relation to storm storage provision Operational limits and monitoring obligations will be secured through Environmental Permit. The Environmental Permit will include conditions requiring management systems to cover operational monitoring, emergency responses and pollution prevention.
21.47	EA, CCoC	**Flood risk** Do you agree with the Applicant's approach to climate change allowance within the FRA [APP-151] regarding fluvial flood risk?	
21.48	Applicant, CCoC, CCC, SCDC	**NPSWW** In accordance with the requirements of NPSWW para 4.4.10, please confirm if there are any relevant national and local flood risk management strategies which apply to any part of the application site?	The Applicant has consulted and referenced local and national flood risk management strategies, including: • National Policy Statement (NPS) for Waste Water (Department for Environment, Food & Rural Affairs, 2012) • National Planning Policy Framework (NPPF) (Department for Levelling Up, Housing and Communities, 2023) • Greater Cambridge Strategic Flood Risk Assessment • Cambridgeshire Local Flood Risk Management Strategy (2021-2027) The NPSWW Accordance Table (App Doc Ref 7.5.1) has been updated in respect of paragraphs 4.4.10 to reflect the above and is being provided at Deadline 1. The NPSWW Accordance Table (App Doc Ref 7.5.1) has been updated in respect of paragraphs 3.10.2 and 3.10.3 to reflect the above and is being provided at Deadline 1.
21.49	Applicant	**Flood risk** Whilst the Sequential Test has been applied to the main area of the proposed WWTP, which is located in Flood Zone 1, it does not appear that the Sequential Test has been applied to the other elements of the proposal (outfall, pipelines and tunnel), which are located in Flood Zones 2 and 3. It is noted that the Applicant considers the outfall, pipelines and tunnel are classified as 'water compatible' development. However, in accordance with the requirements of 4.4.14 of NPSWW, in the first instance preference should be given to locating projects in Flood Zone 1 and if there are no reasonably available sites, then projects can be located in Flood Zone 2. ES Chapter 3 Site Selection and Alternatives [AS-018] gives little information on site selection based on flood risk,	The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. The proposed WWTP will be sequentially located within Flood Zone 1. The nature of the Proposed Development requires waterside infrastructure (outfall) and below-ground river crossings (pipelines and tunnel) within or below Flood Zone 3. The outfall and river crossings, which are water-compatible infrastructure, must be located at or below the River Cam, which is in Flood Zone 3. Table 1-3 of the ES Appendix 20.1 Flood Risk Assessment (5.4.20.1) [**APP-151**] demonstrates that the water-compatible elements of the scheme within Flood Zone 3 are considered appropriate development. The FRA sets out how the sequential test has been applied to the proposed developed. The approach the Applicant has taken is based on all elements of the development located in Flood Zones 2 and 3 being classed as 'Water Compatible' development. The FRA is currently being updated in conjunction with the Environment Agency for submission at Deadline 4. The location of temporary works compounds and storage areas within Flood Zone 3 is addressed in Q21.45 above.

ExQ1	Question to	Question	Response
		therefore the ExA is unclear how the Sequential Test has been applied at all stages of the site selection process. The FRA should detail the how the Sequential Test was been applied during site selection, including details of alternative locations considered and why they were not deemed suitable. It is also highlighted that temporary works compounds would be located within Flood Zones 2 and 3 which the Sequential Test has not been applied to, and therefore further justification is required in this regard.	The site selection process discussed in Stage 2 Site Selection Report - Initial Site Selection App doc ref 5.4.3.2 [APP-075], discusses the use of the Sequential Test in paragraphs 2.1.23 to 2.1.25, and explains that areas at higher risk of flooding were avoided.
21.50	Applicant	**Flood risk** The Notes to Table 2: Flood Risk and flood zone 'incompatibility' contained within para 079 of the PPG on flood risk and coastal changes states that *Some developments may contain different elements of vulnerability and the highest vulnerability category should be used, unless the development is considered in its component parts.* Please justify why the development has been allocated different levels of vulnerability within the FRA [APP-151] and how it can be broken down into component parts for the purposes of flood zone incompatibility bearing in mind the connectivity between all parts.	Table 1-3 of the ES Appendix 20.1 Flood Risk Assessment (App Doc Ref 5.4.20.1) [**APP-151**] breaks down the Proposed Development into component parts according to flood risk vulnerability, in accordance with Table 2: Flood Risk and flood zone 'incompatibility' contained within para 079 of the PPG on flood risk and coastal change.
21.51	Applicant	**NPSWW** Please provide evidence to show how the Proposed Development meets the three elements detailed in para 4.4.17 of NPSWW.	The three elements referenced in para 4.4.17 of NPSWW are: a) it must be demonstrated that the project provides wider sustainability benefits to the community that outweigh flood risk; b) the project should be on developable previously developed land or, if it is not on previously developed land, that there are no reasonable alternative sites on developable previously developed land; and c) a FRA must demonstrate that the project will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. a) The Applicant does not believe that delivery of the project and the embedded mitigation measures it has put in place increase the flood risk of either the development, the surrounding area or the water courses it discharges into. Many of the sustainability benefits of the project are located in the LERMP [AS-066] as well as the carbon chapter of the ES [APP-042] b) The project underwent a comprehensive site selection process, consulting publicly on the decision to develop on the proposed location see site selection and alternatives [APP035] c) ES Appendix 20.1 Flood Risk Assessment (5.4.20.1) [**APP-151**] has been provided as part of the DCO application The NPSWW Accordance Table (App Doc Ref 7.5.1) has been updated in respect of paragraphs 4.4.17 to reflect the above and is being provided at Deadline 1.
21.52	Applicant	**Surface water** Please confirm whether the surface water drainage arrangements are such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project?	The Applicant can confirm that the volumes and peak flow rates of surface water leaving the site will be no greater than the rates prior to the proposed project. To provide more context, the areas inside the earth bank that may potentially be contaminated through spills are drained to the treatment process, treated and discharged with the treated final effluent. Other surfaces inside the earth bank, such as the earth bank walls will utilize sustainable drainage systems (SuDS) to ensure environmental benefit. Outside the earth bank, integration into the existing surface drainage arrangements in as natural a way possible is envisaged, to ensure the landscape is disrupted as little as possible. New roads and assets outside the earth bank will also utilize SuDS, where possible. As shown in the Drainage Strategy [APP-162]
21.53	Applicant	**Mitigation** Para 6.3.3 of the FRA [APP-151] states that *The CoCP Part A and B (Appendix 2.1 & 2.2, App Doc Refs 5.4.2.1 & 5.4.2.2) requires that the Principal Contractor(s) consult with the Environment Agency, Lead Local Flood Authority and any other relevant risk management authorities in respect of the flood risks in the preparation of the Emergency Preparedness Plan for construction work in areas at risk of flooding.* However, the CoCP does not require that the Local Lead Flood Authority or relevant risk management authorities are consulted on the preparation of the Emergency Preparedness Plan. Please update the CoCP Parts A and B accordingly.	The Applicant acknowledges this omission and will make the relevant amendments to this document the include these requirements in the CoCP by deadline 2.

ExQ1	Question to	Question	Response
21.54	Cambridge Water	**Water supply** The Applicant states that the potable water supply to the proposed WWTP would be from Cambridge Water, with a new connection suggested from Horningsea Road running adjacent to the new access road. Can you confirm whether this is likely to be agreed if the Proposed Development were consented?	
21.55	EA, NE	**Water supply** A number of RRs refer to an objection from the EA and NE in June 2023 to the increase in housing in Cambridgeshire on the grounds that supplying water to these homes would pose a significant risk to the local water supply and would also bring about harm to the environment – can you confirm whether this was the case and the context of this objection?	
21.56	Applicant	**Assessment** Save Honey Hill Group RR [RR-035] suggests that the potential 20% reduction in summer low flow of the River Cam in relation to climate change and associated reduction in dilution at the proposed outfall has not been considered in relation to the impacts on water quality, or within the HRA or WFD assessment. Please confirm whether this is the case or not, and explain why.	Potential climate change impacts on low flows have not been taken into account in an assessment of dilution at the proposed outfall, or within the HRA or WFD assessment. This is because of uncertainties which include: • Actual climate change impacts on low flows by 2050; and, • Predictions of future water quality in the river Cam upstream of the outfall from the proposed WWTP. The water quality may vary in the future, for example, due to changes in the quality of upstream discharges and in agricultural practices in the upstream river Cam catchment. As a result, it is not possible to predict with a reasonable degree of accuracy the impact of climate change on downstream river water quality. Please refer to 21.61 below for additional discussion regarding the impacts of climate change on low flows and river water quality.
21.57	Applicant	**NPSWW** Please demonstrate how the Proposed Development has had regard to the most up to date River Basin Management Plan (including any relevant draft Plan), in accordance with the requirements of para 4.2.8 of NPSWW.	The River Basin Management Plan has been considered in ES Appendix 20.3 WFD Assessment Report (App Doc Ref 5.4.20.3) [**APP-153**]. As discussed in Section 1.3, WFD Regulations 2017 set out a requirement to establish river basin districts and for each district, a river basin management plan (RBMP) which is revised every 6 years. The Environment Agency advised that the 2019 RBMP classification data available on Catchment Data Explorer should be used as the baseline, and is assessed in Table 3-1 and Table 4-1, in accordance with para 4.2.8 of the NPSWW. The NPSWW Accordance Table (App Doc Ref 7.5.1) has been updated in respect of paragraphs 4.2.8 to reflect the above and is being provided at Deadline 1.
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?	Cambridge Water's WRMP24 is the most relevant plan to the Proposed Development. Reference to the WRMP is included at paragraphs 2.4.1 - 2.4.6 of the Planning Statement (App Doc Ref 7.5 - AS-166). Cambridge Water's draft WRMP and Anglian Water's draft WRMP, which set out how water companies will manage the water supplies in their region to meet current and future needs (looking ahead 25 years or more), have now been published and shared with the Environment Agency and Ofwat. The significance of Cambridge Water's draft WRMP is cited as one of the reasons for the revision of the GCLP timetable (see paragraph 1.2 of the LDS). The current status of the AW and CW WRMPs, timeline for onward progression and risk and timing of any public inquiries are as follows: • Anglian Water published its Statement of Response and revised draft WRMP on 29 August 2023 • Cambridge Water published its Statement of Response on 25 August 2023 • Cambridge Water published its revised draft WRMP on 29 September 2023 • The Environment Agency has 10 weeks from the SoR publication date to advise Defra on the technical veracity of the WRMPs (ie by 8 November 2023) • Following this it is up to the Defra Secretary of State to direct each company to publish, or to call the WRMP in for a Public Inquiry or Hearing

ExQ1	Question to	Question	Response
			• No further formal announcements are expected until the beginning of 2024 • A resolution to the current position on Water Supply is expected before final adoption of the WRMPs by the end of 2024, not least aided by the establishment of the 'Water Scarcity Working Group' announced by the Prime Minister and the Secretary of State for Levelling Up, Housing and Communities on 24 July 2023 The solutions to resolve the water resources issues in Cambridge and timing by which the Applicant anticipates them being in place is as follows: • Short-term: demand management (which also needs to continue into the long-term) • Medium-term: supply from Grafham Water which is dependent on a new pipeline and Affinity reducing their supply from Grafham (expected 2032) • Long-term: Fens Reservoir (expected 2036); other sources may be required for the higher Gove numbers The Applicant is assisting in resolving these issues by: • Potential supply from Grafham Water • Sharing experience on demand management • Exploring opportunities for reuse of water from our Cambridge Water Recycling Centre Whilst the current questions over water supply are frustrating immediate development proposals, long term measures to resolve this issue (including through the delivery of new reservoirs and other measures proposed in the draft WRMPs) have been identified which will enable the strategic sites (including NEC) to come forward. Resolution of this issue without risk of significant changes to the spatial development strategy for homes and jobs in the emerging GCLP (specifically the three key strategic sites) can be confidently presumed given the initiatives announced by the Prime Minister and the Secretary of State for Levelling Up, Housing and Communities on 24 July 2023 and given that these sites are still some way away from delivery (for example, in the case of NEC and East Cambridge, because of the need for relocation of existing activity until the late 2020s/early 2030s) such that, even if the resolution of the problem cannot be accelerated, there can be confidence that new housing to meet Greater Cambridge's requirement can come forward with the new reservoir in place. This position is supported by the statement in the Development Strategy Update (Regulation 18 Preferred Options) report approved on 6 February 2023 that the Councils "*can be confident there will be capacity in terms of water supply and housing delivery to see at least some additional development coming forward within the plan period to 2041*" and that this provides the basis therefore for beneficially confirming a clear position on three key strategic sites including NEC. In the circumstances set out above, delays to the GCLP do not materially affect the case for CWWTPR as presented in the DCO application. In respect of the Water Supply issue, and for the avoidance of doubt, the Environment Agency has not raised the issue of water supply in relation to the DCO and in its relevant representation (RR-013) it states: *The proposed new facility is replacing the existing works so no additional demand to the water supply will be made.* The NPSWW Accordance Table (App Doc Ref 7.5.1) has been updated in respect of paragraphs 4.2.8 to reflect the above and is being provided at Deadline 1.
21.59	EA, CCC, CCoC, SCDC, NE.	**Review of additional information** Please review and comment on the additional information provided by the Applicant in response to the ExA's Procedural Decision [PD-004], regarding the impacts of the Proposed Development on water resources with particular reference (but not limited to): the oOMMP [AS-073], Appendix 20.5 Fluvial Modelling Report [AS-113] and Appendix 20.6 3D Velocity Mixed Model [AS-114].	
21.60	Applicant	**Mitigation**	The Applicant will update the oOMMP to incorporate measures in para 4.1.66 of the ES Chapter 20 Water resources. This will be provided at Deadline 2.

ExQ1	Question to	Question	Response
		Not all of the mitigation measures proposed within para 4.1.66 of ES Chapter 20 [AS-040] are contained within the oOMMP [AS-073]. Please update the oOMMP accordingly.	
21.61	Applicant	**Effects** ES Chapter 20 [AS-040] para 4.2.33 states that there would be a moderate significant beneficial effect on the water quality of the River Cam during operation of the Proposed Development compared to the current conditions. However, within the same para it is also stated that climate change could impact on low flows, which could cause a substantial reduction in river flow which dilutes the final effluent discharge (thus reducing the stated beneficial impacts on the River Cam). Given that the Proposed Development should be assessed on a worst case scenario basis, please justify the conclusion that there would be a residual significant beneficial effect on the water quality of the River Cam, with the aforementioned impacts of climate change taken into account.	As also indicated in 21.56, potential climate change impacts on low flows have not been taken into account in the assessment. This is because of uncertainties which include: • Actual climate change impacts on low flows by 2050; and, • Predictions of future water quality in the river Cam upstream of the outfall from the proposed WWTP. The water quality may vary in the future, for example, due to changes in the quality of other upstream discharges and in agricultural practices in the upstream river Cam catchment. As a result, it is not possible to predict with a reasonable degree of accuracy the impact of climate change on downstream river water quality. However, as indicated in the future baseline section, ES Chapter 20 (App Doc Ref 5.2.20) [AS-040] para 3.2.1 '*The Proposed Development will be subject to environmental permitting regulations. Further phased development or adaptations within the proposed WWTP would be secured through Asset Management Plan (AMP) cycles within the context of RBMP cycles. This will ensure that WFD standards are upheld and that there will be no deterioration of river water quality*.' We assume that the Environment Agency will be involved in the assessment of changes in future conditions and river water quality. Changes in effluent quality, required to prevent any deterioration in river water quality, will be agreed between the Applicant and the Environment Agency. It should also be noted that the impacts of climate change on low flows would apply to either the Proposed Development or the Existing Cambridge WWTP, if the existing WWTP continued to operate, as discussed under future baseline in ES Chapter 20 (App Doc Ref 5.2.20) [AS-040] para 3.2.1. Climate change will affect river water quality in the future, independent of the changes made to effluent discharge. Therefore, in this instance, it seems reasonable in the assessment to compare the Proposed Development with the current situation for the Existing Cambridge WWTP, without taking into account the possible impacts of climate change on low flows (or future water quality in the upstream catchment).
21.62	Applicant	**Additional information** ES Book of Figures Water Resources [APP-067] Figure 20.1 does not delineate flood risk zones 3a and 3b – please updating the map accordingly.	The Applicant uses publicly available Flood Zone data from the Environment Agency in Figure 20.1 in ES Book of Figures Water Resources (App Doc Ref 5.3.20) [**APP-067**] and Figure 5 in the Flood Risk Assessment (App Doc Ref 5.4.20.1) [**APP-151**]. The open-access EA Flood zone designation is considered the best and most recent available data on UK flood zones, and this does not partition Flood Zone 3 into Flood Zone 3a and Flood Zone 3b. Flood Zone 3a and 3b delineations are often provided in the Local Planning Authority's Strategic Flood Risk Assessment, but are only updated when the SFRA is updated, typically every 7-10 years, and therefore become out of date quite quickly. The Applicant does not refer to Flood Zones 3a and 3b within ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [**AS-040**], and therefore splitting up Flood Zone 3 into Flood Zones 3a and 3b does not serve a material purpose within Figure 20.1 in ES Book of Figures Water Resources (App Doc Ref 5.3.20) [**APP-067**]. Within the Flood Risk Assessment (App Doc Ref 5.4.20.1) [**APP-151**], Flood Zones 3a and 3b definitions are provided and discussed in relation to flood risk vulnerability. However, mapping of these designations would not necessarily add further clarity to the proposed water compatible development within Flood Zones 1,2, and 3.
21.63	Applicant	**Water quality management plan** dDCO [AS-139] R22 requires the provision of a water quality monitoring plan prior to operation of the Proposed Development – why is this not required prior to commissioning of the Proposed Development, which could also have potential impacts on water quality?	As discussed in 21.11 above, the Applicant has prepared an Outline Water Quality Monitoring Plan(App Doc Ref 5.4.20.13). This has been agreed in principle with the Environment Agency and will be submitted at Deadline 1. The final version of the plan, following approval from the Environment Agency, will be submitted at Deadline 2. This will include 12 months of pre-construction monitoring, monitoring during construction, 12 months of post-construction monitoring, and operational monitoring to 2050
21.64	Applicant	**Additional information** Please provide the outline Operational Water Quality Monitoring Plan referred to in R22 of the dDCO.	As discussed in relation to 21.11 above, the Applicant has prepared an Outline Water Quality Monitoring Plan. This has been agreed in principle with the Environment Agency and will be submitted at Deadline 1. The final version of the plan, following approval from the Environment Agency, will be submitted at Deadline 2.

Get in touch

You can contact us by:

Emailing at **info@cwwtpr.com**

Calling our Freephone information line on **0808 196 1661**

Writing to us at **Freepost: CWWTPR**

Visiting our website at **www.cwwtpr.com**

You can view all our DCO application documents and updates on the application on The Planning Inspectorate website:

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