

Cambridge Waste Water Treatment Plant Relocation Project
Anglian Water Services Limited

Applicant's Response to Relevant Representations

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1 Introduction

1.1 Purpose of this document

- 1.1.1 On the 28th of April 2023, Anglian Water Services Limited (“the Applicant”) submitted an application for a Development Consent Order (DCO) (referred to hereafter as the DCO application) for the Cambridge Waste Water Treatment Plant Relocation Project (CWWTPRP) to the Secretary of State for the Department for Environment, Food and Rural Affairs (DEFRA). The applicant was subsequently accepted for examination on the 24th of May 2023.
- 1.1.2 Following the acceptance of the DCO Application the Applicant commenced the statutory consultation period under section 56 of the Planning Act 2008 which ran from the 14th of June 2023 to 23.59pm on the 19th of July 2023. During this period a total of 310 Relevant Representations were submitted to the Examining Authority by Interested Parties, each of these have been reviewed with this document providing the Applicants responses to each of the issues raised.
- 1.1.3 A breakdown of the 310 Relevant Representations are as follows:
- 6 representations from local planning authorities;
 - 5 representations from parish councils;
 - 8 representations from Statutory Parties defined within Regulation 3(a) of the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015 (as amended);
 - 60 representations from affected persons;
 - 218 representations from members of the public/businesses; and
 - 13 representations from other organisations.

1.2 Structure of this document

- 1.2.1 The issues raised within the Relevant Representations, and the Applicant's responses, have been set out in a series of tables. Whilst the Applicant acknowledges every comment, only those requiring a specific response have been set out in the table. The table has been structured to provide the comments and then the Applicant's response. Background information or statements of opinion have not been included. This has been done to focus attention on the comments and avoids a verbatim copy of each Relevant Representations.
- 1.2.2 For Local Authorities, Parish Councils and statutory bodies defined under Regulation 3(a) of the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015 (as amended) individual response tables have been provided in Section 3.

- 1.2.3 For all other Interested Parties (persons with an interest in land as defined in Regulation 3(b) of the of the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015), individual response tables have been provided in Section 4.2.
- 1.2.4 Wider stakeholders, members of the public, businesses and community groups, similar representations have been summarized according to key themes and a summary response has been provided by the Applicant within Section 4.1. Where similar representations have been grouped and summarised, the relevant representation ID number has been listed ensuring all representations can be identified. Save Honey Hill's and the Marshall Groups Relevant Representations have been responded to in full and can be seen in Section 4.2. Affected parties' comments specifically regarding land and compulsory acquisition issues have been answered in Section 4.3.

2 Common Themes in Relevant Representations

2.1 Introduction

2.1.1 The Applicant noted that many of the Relevant Representations presented comments on the same issue or theme. These key themes are listed in Sections 2.2 to 2.6 below. The detail in these sections provides information regarding these themes.

2.2 The need for the CWWTPR Project

2.2.1 The need for this project is set out in the Planning Statement (App Doc Ref 7.5) [APP-166]. The North East Cambridge Area Action Plan (NECAAP) 'Chronology' report July 2021 provides a summary chronology of evidence that has assessed in the period between 1989 and 2021 on the feasibility of redeveloping the existing Cambridge WWTP, either on the current site (through consolidation) or elsewhere. The chronology includes reference to the relevant development plans in place or being prepared at the time of those feasibility exercises, including the emerging NECAAP. The Chronology report establishes that the feasibility of consolidation and relocation has been tested through previous masterplans, the 2006 examination of the Cambridge Local Plan, and the 2014 Issues & Options Report. The 2019 Issues & Options Report did not revisit this topic, but relied on the fact that the HIF funding (see HIF Grant Funding Agreement (GDA) (App Doc Ref 9.8 included in the Applicant's submission at Deadline 1) was available for the relocation of the existing Cambridge WWTP would address the feasibility of redeveloping the area.

2.2.2 The Chronology report references the four options explored in the 2014 Issues & Options Strategic Assessment (Main Report) (see the Planning Statement (App Doc Ref 7.5) [APP-166], as follows. Retention of existing businesses and the Cambridge WWTP (Options 1 and 2), retention of the Cambridge WWTP but reconfigured onto a smaller site, with more indoor or contracted operations, subject to technical, financial and operational deliverability (Option 3) and relocation off site, subject to identification of a suitable, viable and deliverable alternative site being identified (Option 4).

2.2.3 The papers and evidence base considered by the Councils before approving the Regulation 19 version of the NECAAP between 30 November 2021 and 11 January 2022 (as referred to in paragraph 2.3.14 of the Planning Statement (App Doc Ref 7.5) [APP-166] include the NECAAP – Sustainability Appraisal November 2021 that considers whether there are reasonable alternatives to development of the North East Cambridge (NEC) site.

2.2.4 Section 4 'Area Action Plan and Reasonable Alternatives' of the NECAAP Sustainability Appraisal November 2021 contains a description of the likely effects of the options for the overall development of the NEC site, having regard to different assumptions relating to the existing Cambridge WWTP. It refers to the NECAAP being prepared on the assumption that the existing Cambridge WWTP will

be relocated, that reasonable alternative locations for the proposed WWTP are outside the scope of the NECAAP (and the emerging GCLP) and, therefore, outside the scope of the Sustainability Appraisal. It goes on to say “the preferred location for the proposed WWTP will be taken into consideration when determining the cumulative effects of the Local Plan and NEC AAP”.

- 2.2.5 As part of the feasibility assessments referred to above, the Applicant has been consulted and has responded to questions relating to the practical, operational and financial feasibility of the options being considered. In particular, reference is made in the Chronology report to Anglian Water's involvement in the Cambridge Northern Fringe Illustrative Master Plan 2003 – 2004, its evidence as recorded in the Cambridge Local Plan Inspectors Report (2006), the Cambridge Northern Fringe East Viability of Planning Options (May 2008), the Cambridge Northern Fringe East Area Action Plan (AAP) Issues & Options and accompanying Interim Sustainability Report 2014 and the inputs provided by the Applicant to the application and business case for Housing Infrastructure Fund (HIF) Bid submissions in 2017 – 2019. See the Planning Statement (App Doc Ref 7.5) [**APP-166**] for more details.
- 2.2.6 These inputs by the Applicant are summarised in a letter from the Applicant to Greater Cambridge Shared Planning dated 24 March 2021. The letter responded to a request made in the context of the preparation of the Chronology Report in advance of approving the Regulation 19 version of the NECAAP to provide information on what feasibility work was undertaken as part of the HIF application in the period 2018 – 2020 which specifically looked at the option of downsizing / consolidation of the existing WWTP on its existing site.
- 2.2.7 Evidence supporting the emerging Greater Cambridge Local Plan (GCLP) is clear that NEC is the most sustainable location for strategic scale development within Greater Cambridge. A critical finding in the climate change evidence that assessed spatial options for the GCLP, which is key in determining the proposed development strategy, is that location is the biggest factor for carbon emissions, including the quality of access to public transport, active and low carbon travel modes, plus the need to travel regularly ((GCLP Strategic Spatial Options Assessment: Carbon Emissions Supplement, November 2020[1] page 12) (see the Planning Statement (App Doc Ref 7.5) [**APP-166**])).
- 2.2.8 The preferred strategy, therefore, focuses growth at a range of the best performing locations in terms of minimising trips by car, as demonstrated by the GCLP Transport Evidence (October 2021)[2]. In terms of non-car mode shares and car trips per dwelling, the Transport Evidence concludes that development at NEC is the best performing location considered (page xviii and section 14.3).
- 2.2.9 The NECAAP Sustainability Appraisal November 2021 records the HIF business case concluded that even if consolidation into the north eastern portion of the existing Cambridge WWTP site could have been achieved, at best this would release *circa* 40% of the existing operational area, but the area released would be constrained by operational needs and odour safeguarding. The Appraisal also records this would result in only 16 hectares of potentially developable land becoming available. Due to the odour constraints, development of the released land would

only be suitable for industrial or commercial use, and the overall quantum enabled would be minimal.

- 2.2.10 The £227m of HIF funding is to be used to relocate the existing Cambridge WWTP and for decommissioning works necessary to take the existing plant out of operational use and to surrender its current operational permits. This would address the major market failure to unlock development and allowing, through Cambridge's strong property market and underlying land values, conventional developer funding and planning to deliver the physical, environmental and social infrastructure that will underpin the housing delivery. Without this full HIF funding, the infrastructure scheme will not be delivered and the delivery of 8,350 homes, together with associated mixed uses and infrastructure cannot be realised.
- 2.2.11 The consequences, therefore, of not relocating the existing Cambridge WWTP are likely to be a significant reduction in the potential delivery of homes in NEC. This would be contrary to the objectives currently contained within the emerging joint GCLP. Since the enlarged NECAAP area (from the adopted 2018 Local Plans) is a key component of future pipeline of housing and other development supply in the new plan period to 2041, loss of the full development potential of this area is likely to have a significant effect on the Local Plan. The inability to provide housing (and associated community and cultural facilities) would prevent the achievement of the NECAAP aim to rebalance an employment-dominated part of Cambridge, achieving a sustainable mix of housing, work, retail and leisure and reducing the need to travel by exploiting its proximity to sustainable transport infrastructure including the guided busway, Cambridge North Station, cycling infrastructure and walking routes.

2.3 Development within the Green Belt

- 2.3.1 The Applicant's response to ExQ1.11.1 provides a detailed breakdown of the extent of the draft Order Limits which fall within and outside Green Belt, and the area of land within the Green Belt which constitutes inappropriate development. In Section 6.2 of the Planning Statement (App Doc Ref 7.5) [AS-166] the Applicant has set out the Very Special Circumstances case of the Proposed Development within the Green Belt. This also includes an explanation of how the Proposed Development complies with national and local planning policies on development within the Green Belt. Paragraph 4.8.34 sets out those elements of the proposed development which fall within the exceptions at paragraph 150 of the NPPF. Paragraphs 6.2.6 to 6.2.12 the Planning Statement (App Doc Ref 7.5) [AS-166] detail the assessment of sites, the suitability of the chosen site, and outlines the lack of alternative sites available. Site selection and consideration of alternatives is also summarised in ES Chapter 3 Site Selection and Alternatives (App Doc Ref 5.2.3) [AS-018].
- 2.3.2 The Consultation Report (App Doc Ref 6.1) [AS-115] outlines how the Applicant consulted the local communities and residents and responded to their feedback.

2.4 Carbon assessment

- 2.4.1 Environmental Statement Chapter 10 – Carbon (App Doc Ref 5.2.10) [AS-042] provides an assessment of carbon emissions and proposed mitigation measures for the land use changes, decommissioning of the existing Cambridge WWTP, construction of the Proposed Development (including embedded carbon in materials) and the operation of the Proposed Development.
- 2.4.2 The Application does not include the demolition of the existing Cambridge WWTP or its redevelopment for low carbon housing and employment uses, which will be approved through a separate planning permission. Carbon impacts associated with these activities are, therefore, not assessed in the Environmental Statement, but they are considered in a high-level Strategic Carbon Assessment which accompanies the Application (App Doc Ref (7.5.2) [AS-207].

2.5 Proposed Development and Landscape Design

- 2.5.1 The following application documents outline how the design of the proposed development and landscaping scheme was developed, taking account of consultation feedback, including from local residents, and assessed for landscape and visual effects and mitigation measures.
- Design and Access Statement (App Doc Ref 7.6) [AS-168]
 - Landscape, Ecological and Recreational Management Plan (LERMP) (App Doc Ref 5.4.8.14) [AS-066]
 - Environmental Statement Chapter 15 Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034]
 - Environmental Statement Volume 4 Chapter 15 Appendix 15.1 Photomontages (App Doc Ref 5.4.15.1) [APP-127]
 - Consultation Report (App Doc Ref 6.1) [AS-115]
- 2.5.2 The specification for the establishment and growth of the planting has not yet been detailed. Requirement 7 (Detailed Design), and Requirement 11 (LERMP) within Schedule 2 of Draft DCO (App Doc Ref 2.1) [AS-139] require details to be submitted to, and approved by, the relevant planning authority. These details include, but are not limited to, the layout, scale, design and external appearance of any plant and buildings, landscape planting, highway design, details of electric vehicle parking provision. The details submitted must include an explanation of how they accord with the design objectives set out in section 11 of Design and Access Statement (App Doc Ref 7,6) [AS-168] or an explanation of why this is not reasonably practicable. Collectively these would include further details on the design of the earth bank and specifications in relation to planting.
- 2.5.3 The monitoring of the earth bank for a minimum of 30 years as part of the biodiversity net gain (BNG) obligation is included in the LERMP. This commitment is also secured by Requirement 11 in Schedule 2 of the draft DCO (App Doc Ref 2.1)

[AS-139] which requires a detailed landscape ecological and recreational management plan to be submitted to, and approved by, the relevant planning authority.

2.6 Traffic Management

2.6.1 The impacts of construction and operational traffic have been carefully considered within the design and traffic management measures for the Proposed Development, as outlined below.

Operational Traffic Management

2.6.2 The Operational Workers Travel Plan (App Doc Ref 5.4.19.8) [APP-149] sets out measures to encourage sustainable travel and reduce single occupancy private vehicle use associated with all operation and maintenance activities with the overall aim of reducing vehicle trip and encouraging active travel. Sections 5 and 6 of this Travel Plan outline the operational traffic movements of the existing Cambridge WWTP and the proposed WWTP, respectively.

Construction Traffic Management

2.6.3 Environmental Statement Chapter 19 Appendix 19.7 Construction Traffic Management Plan (CTMP) (5.4.19.7) [AS-109] has been prepared to outline the traffic management measures to be implemented for the Proposed Development during the construction phase. Measures to reduce the impact of construction on the A14 and surrounding roads include the following.

- Specified arrival and departure routes for construction traffic as set out in Section 4.1, Table 4-1 of the CTMP which avoid routing through local roads where possible.
- All deliveries are to be planned outside of peak hours (8am-9am, 3-4pm and 5-6pm Monday to Friday), unless it is determined to be essential that the delivery is to be completed during these hours (Section 4.2, Paragraph 4.2.5 and Section 6.4 of the CTMP).
- Commitment to, and compliance with, safety measures and requirements for the Fleet Operator Recognition Scheme (FORS) and Construction Logistics & Community Safety (CLOCS) (Section 6.2 of the CTMP).
- Temporary speed restrictions to Horningsea Road will be put in place in accordance with the Temporary Traffic Regulation Order set out in Article 16 of the draft DCO (App Doc Ref 2.1) [AS-139] for the duration of the works (Section 6.9, Paragraph 6.9.3 of the CTMP).

2.6.4 As defined in Schedule 2, Part 1, of the draft DCO (App Doc Ref 2.1) [AS-139], Requirement 9 requires a CTMP for each phase of the Proposed Development to be submitted and approved alongside the CEMP for such phase. The Applicant, therefore, is committed to implementing the CTMP controls and also has the opportunity to update the CTMP, in collaboration with the relevant highways authorities, so that it reflects any concerns raised on the mitigation strategies.

3 Applicant's Response to Relevant Representations from Regulation 3(a) Local Authorities, Parish Councils and Statutory Parties

3.1 Local Authorities

Table 3-1 East Cambridgeshire District Council (RR-003)

Reference	Relevant Representation Comment	Applicant's Response
I.	1. Impact on highways 2. Visual Impact 3. Biodiversity Impact 4. Public benefit of the scheme	<p>The Applicant acknowledges these are East Cambridgeshire District Council's areas of concern and these topics are assessed/ described in the following.</p> <ol style="list-style-type: none"> 1. ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) [AS-038], Appendix 19.3 Transport Assessment [AS- 108a-108b]. 2. ES Chapter Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034] 3. ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [AS-026] 4. Planning Statement (section 2.2) (App Doc Ref 7.5) [AS-129] describes what the Proposed Development will deliver including, at paragraph 2.2.17, a list of the benefits that will result from the scheme (Proposed Development).

Table 3-2 South Cambridgeshire District Council (RR-004)

Reference	Relevant Representation Comment	Applicant's Response
Introduction 3.	As set out below the District Council's position in overall terms is that of support for the DCO application subject to the resolution of a number of matters and subject more specifically to the assessment of the ExA and the determination by the Secretary of State of the DCO application in light of the ExA's report and recommendation.	The Applicant welcomes the District Council's support.
Development Plan Context 9. & 10.	<p>The DCO application correctly highlights the District Council's and the Cambridge City Council's shared long-held ambition to regenerate the part of the city within which the existing plant is located (the CWWTP site'). Over the past 20 years the CWWTP site and surrounding area has been promoted through consecutive statutory planning policy documents for redevelopment, to make the most of the Greater Cambridge area's sustained economic growth and, more recently, the investment in sustainable transport provision that serves the North East Cambridge area.</p> <p>As further outlined in the DCO application (See Planning Statement, doc 7.5), such ambition has not been able to be realised to date due to the cost of relocation of the CWWTP rendering the proposal unviable. The existing CWWTP also constrains development in the surrounding area due to the odour contours around the plant. The option of consolidation on site has been put to Anglian Water (the applicant) in the past but this was dismissed by</p>	<p>The Applicant acknowledges the support and confirms the DCO application will help South Cambridgeshire District Council achieve their long-held ambition to regenerate that part of the city where the existing plant is located. The need for this project is set out in the Planning Statement (App Doc Ref 7.5) [APP166].</p> <p>See section 2 above regarding the need for the Proposed Development, covering the option of consolidating the existing Cambridge WWTP.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>them as not being technically feasible due to the need to maintain the operational capacity of the existing plant during construction. Further, consolidation would only realise the release of limited land, as the redevelopment potential created by this option would continue to be constrained by odour, hours of operation etc. The current submission is instead a result of a funding bid submitted under the Housing Infrastructure Fund (HIF) aimed at unlocking new housing growth opportunities.</p>	
<p>NPPF and Green Belt Policy 29.</p>	<p>The District Council notes that under the 2008 Act local development plan policy as well as national policy (set out in the NPPF) has a different role in respect of the assessment of future development than under the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004 (see NPPF para 59).</p>	<p>A review of compliance with national and local planning policy is presented in the Planning Statement (App Doc Ref 7.5) [APP-166], and a Planning Statement NPSWW Accordance Table, Planning Statement NPPF Accordance Table and Planning Statement Local Policies Accordance Tables, all of which are part of the Applicant's submission at Deadline 1.</p>
<p>NPPF and Green Belt Policy 33.</p>	<p>The proposed new ReCWWTP, as it amounts to new built development, constitutes "inappropriate development" in the Green Belt as defined by the NPPF [para 149] and in the view of the District Council does not meet any of the exceptions to that definition in NPPF 149 and 150. It is therefore by definition harmful to the Green Belt and requires demonstration of very special circumstances.</p>	<p>The Applicant refers the stakeholder to section 2.3 above.</p>
<p>NPPF and Green Belt Policy 34.</p>	<p>The District Council notes that the applicant considers that a "number of the elements of the project... fall within the exceptions listed at paragraph 150 of the NPPF" (ref Planning Statement (DOC ref.7.5 [4.8.34]). This is on the basis that these elements "preserve the openness of the green belt and do not conflict with the purposes of including land in the Green Belt" (see NPPF 151). The</p>	<p>The Applicant's justification for considering these elements of the project falling within the exceptions listed at paragraph 150 of the NPPF is outlined in the Planning Statement (App Doc Ref 7.5) [APP-166].</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>elements listed are “the transfer tunnels, proposed access roads to the WWTP and connecting infrastructure and the discharge point”.</p>	
<p>NPPF and Green Belt Policy 35.</p>	<p>The applicant submits that the access roads are “local transport infrastructure which can demonstrate a requirement for a Green Belt location” 4.8.34]. The District Council considers that even if it were accepted that the access roads require a Green Belt location, the application still needs to satisfy the other part of the NPPF exception test which requires they ‘preserve its openness and do on the basis not conflict with the purposes of including land within ..[the Green Belt]’ (NPPF paragraph 150).It is therefore the District Council’s view that the ExA will need to satisfy itself on this specific matter</p>	<p>The Applicant considers that the site selection process has led to a Green Belt location being chosen for the proposed WWTP, it follows that the access roads are required to be in the Green Belt. The Planning Statement Green Belt Assessment (App Doc Ref (7.5.3) [APP-207] states, at paragraph 5.1.4, that <i>the new junction on Horningsea Road for the access road to the proposed WWTP has been located opposite the A14 eastbound off-slip road to minimise the urbanizing influence of a new road junction on Horningsea Road. The vegetation belt along Horningsea Road between Low Fen Drove Way and the bridge over the A14 would be reinstated and strengthened to screen the new junction from further north along Horningsea Road, reducing the impact on the contribution of the proposed WWTP site in preserving the setting of Cambridge (Cambridge Purpose 2).</i></p>
<p>Biodiversity 36. & 37.</p>	<p>The District Council has considered the Biodiversity Net Gain (BNG) report at Appendix 8.13 [Doc ref 5.4.8.13] and the Biodiversity Chapter of the ES [Doc ref.5.2.8]. The outcome of the calculation shows that all three measures (habitat, hedgerow, and river) will achieve a net gain in measurable biodiversity when applied to areas within the redline boundary. However, the report also recognises that there are “trading down” issues relating to the approximately 3% net gain in river units.</p>	<p>The Applicant disagrees that a solution is yet to be presented. The Applicant is committed to achieving 20% gain in river units and this is outlined in Appendix C of the ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163].</p> <p>The Applicant notes that, in relation to trading down, in Chapter 5.3 of Appendix 8.13 of the BNG Report (Doc ref 5.4.8.13) [AS-163] it states that the design will result in the trading down due to a small net unit loss of two high distinctiveness habitat types, these are: Wetland – reedbeds</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>The report recommends that an offsite solution to the river unit is found and that a further 17% of measurable net gain is acquired. The District Council considers that this is acceptable in principle, but a solution is yet to be presented by the applicants. Once agreed, this should be secured through a section 106 planning obligation pursuant to the 1990 Act.</p>	<p>and Rivers – other rivers and streams. This is due to the location of the proposed new outfall on the river Cam which will result in riparian encroachment. Measures to avoid trading down and achieve an increase in net gain for river units are outlined in Appendix C of the BNG Report: Outline River Units Net Gain Strategy (App Doc Ref 5.4.8.13) [AS-163] at 1.2.2: <i>'In order to achieve a 20% BNG on river units the following is required:</i></p> <ul style="list-style-type: none"> • <i>0.03 BNG river units delivered on the river Cam (or a river/watercourse in Cambridgeshire) to deliver on 'high distinctiveness'; and</i> • <i>1.75 BNG units delivered via the creation of at least 227m of ditches which hold water all year.'</i> <p>The majority of the river BNG units are to be delivered within the Order Limits as the creation of 227m of ditches shown in Figure 1 of Appendix C of the BNG Report: Outline River Units Net Gain Strategy (App Doc Ref 5.4.8.13) [AS-163]. This leaves 0.03 BNG high distinctiveness river units to be delivered off-site and so outside of the Order Limits because there are no opportunities to deliver these within the Order Limits due to the existing uses in the area (public access, boating, angling).</p> <p>In relation to securing a solution for offsite units, as stated in paragraph 1.4.3 of Appendix C of the BNG Report: Outline River Units Net Gain Strategy (App Doc Ref 5.4.8.13) [AS-163], <i>'River unit credits are not currently available on the market,</i></p>

Reference	Relevant Representation Comment	Applicant's Response
		<p><i>but are likely to be in the near future. A requirement within Schedule 2 of the Draft DCO requires a detailed written scheme for the 0.03 BNG high distinctiveness river unit delivery prior to the commencement of the works at the proposed outfall (Work Area 32).'</i> Local opportunities are being identified by the Applicant to align the timing of their delivery with the Works Plan 32 (see Works Plans (App Doc Ref 4.3) [AS-150] draft DCO requirement).</p> <p>The Applicant has amended requirement 10(6)(e) (App Doc Ref 2.1 Revision 5) to ensure that 20% BNG in respect of river units is delivered. The requirement now reads:</p> <p><i>"(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-</i></p> <p>...</p> <p><i>(e) details of measures for the achievement of twenty percent biodiversity net gain comprising river units within or outside of the Order limits"</i></p> <p>Some consequential amendments have been made to requirement 11(2).</p> <p>The Applicant considers a DCO requirement is appropriate at this stage and not to cover this point in a section 106 agreement. This is because the requirement sufficiently</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>secures the overall delivery of 20% BNG and is able to cover the potential for on- and off-site provision, if necessary (where off-site delivery would be secured in the future at the appropriate time through various mechanisms). If it was included in a section 106 agreement now, it would need to be drafted now with a very narrow scope where it is difficult and unnecessary to refine the detail of delivering the units.</p> <p>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 Application was submitted. 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 confirm an agreed position. In the event a viable river unit opportunity did not materialise, the Applicant would ensure delivery by widening the geographical area of search for opportunities to deliver the BNG units.</p> <p>The Applicant will update the ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163] for Deadline 2.</p>
Biodiversity 38.	In respect of the ES Chapter 8: Biodiversity, the District Council notes Table 2-8 and expects to require further clarification on specific details directly in relation to this with the applicant ahead of the examination	The Applicant notes this potential request and is happy to provide any further clarifications in the continued Biodiversity Technical Working Group or during ongoing preparation of the Statements of Common Ground (SoCGs) and record the outcomes in the relevant SoCG.

Reference	Relevant Representation Comment	Applicant's Response
Biodiversity 39.	<p>The District Council has not had an opportunity to consider the following documents due to confidentiality issues resulting in a delay with them being shared following the submission of the DCO application.</p> <ul style="list-style-type: none"> • Appendix 8.4: Ornithology Baseline Technical Appendix • Appendix 8.8: Badger Technical Appendix 	<p>The Applicant has provided unredacted copies of these documents directly to the District Council. The Applicant welcomes the opportunity to discuss any queries the District Council may have regarding these documents. Any relevant record of the outcome of these discussions will be recorded in the Statement of Common Ground.</p>
Biodiversity 40.	<p>In addition to the above, a Preliminary Ecological Appraisal undertaken in 2020 has been referenced in several appendices (e.g., Appendix 8.1: Aquatic Technical Appendices, Appendix 8.11 Great Crested Newt Baseline Technical Appendix. This has not however been submitted, either as the original document, or an updated version.</p>	<p>The Applicant has now provided a copy of Appendix 8.1: Aquatic Technical Appendices, Appendix 8.11 Great Crested Newt Baseline Technical Appendix, which is available in the Examination Library (App Doc Ref 5.4.8.23) [AS-072].</p>
Climate Resilience 45.	<p>The District Council also agrees with the future baseline of 2090's (2090- 2099), reflecting the fact the project has no definitive end of life. The use of the highest emissions scenario available, ensuring assessment is carried out on the 'worst-case scenario' is also supported. However, the District Council considers this should align with the climate scenarios used to predict the operational carbon emissions of the site to ensure consistency. It does not currently do so</p>	<p>The Applicant thanks the District Council for its confirmation that it agrees with the future baseline and emissions scenario used in the climate change assessment.</p> <p>In terms of ensuring this is aligned with the climate scenarios used to predict the operational carbon emissions of the proposed WWTPR, different climate scenarios and data have been used for two different purposes within the Carbon and Climate Resilience assessments. This is in line with industry guidance.</p> <p>For ES Chapter 10: Carbon (5.2.10) [APP-042], UK Government projections for grid electricity decarbonisation are used to</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>inform operational carbon calculations. For the ES Chapter 9: Climate Resilience (App Doc Ref 5.2.9) [APP-041], climate change scenarios and projection data on temperatures and precipitation changes have been used to identify future climate conditions and weather extremes, for the purposes of identifying future impacts to the development and its operation. These different data are not commonly applicable to the two assessments, so climate scenarios and data most appropriate to each have been used.</p>
<p>Climate Resilience 47.</p>	<p>Secondary mitigating measures mainly focus on management plans which look at monitoring and management of impacts during the operational phase. The District Council agrees that these should be excluded from the assessment. However, the management plans outline more responsive measures rather than pro-active. It is important, in the District Council's view, that they are secured either by way of a requirement or S106 agreement given the role they play in ensuring the proposed ReCWWTP and its claimed improve resilience are fully delivered when the plant is operational.</p>	<p>The Applicant notes the District Council's comments on whether proactive mitigation measures should be included within the management plans.</p> <p>The Applicant refers to the dDCO (App Doc Ref 2.1) [AS-139] which includes a series of requirements (these are similar to planning conditions). The Applicant refers to Figure 2.1 within the mitigation tracker (App Doc Ref 5.4.2.6) [AS-055] which identifies mitigation and how the mitigations are secured.</p> <p>In relation to proactive measures the Applicant considers these are specified within Section 2.8 of the ES Chapter 9: Climate Resilience (App Doc Ref 5.2.9) [APP-041]. This sets out the embedded mitigation measures that have been part of the design of the Proposed Development and have been considered within the assessment. For example, designing the surface water drainage system to account for storm events with an allowance for climate change.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The dDCO (App Doc Ref 2.1) [AS-139] includes a number of requirements related to the delivery of embedded mitigation measures referenced in the ES, which are as follows.</p> <ul style="list-style-type: none"> Requirement 7 (Detailed design) places a specific requirement for each phase of the authorised development to commence once design details have been approved in writing by the relevant planning authority. These details include, but are not limited to, the layout, scale, design and external appearance of any plant and buildings, landscape planting, highway design, details of electric vehicle parking provision. The details submitted 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. Requirement 15 (Drainage) requires a drainage strategy that sets 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. Each detailed drainage strategy must accord with the measures set out in the drainage strategy in so far as they apply to the works in the relevant phase, and each phase must be carried out in accordance with the approved detailed drainage strategy. <p>The measures set out in the management plans supplement the embedded mitigation but are responsive because they relate to the operation of the scheme, rather than the design</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>of the scheme. These secondary mitigation measures are included in the assessment in ES Chapter 9: Climate Resilience (App Doc Ref 5.2.9) [APP-041].</p> <p>The dDCO (App Doc Ref 2.1) [AS-139] includes several requirements in relation to the preparation and implementation of detailed management plans, as follows.</p> <ul style="list-style-type: none"> • Requirement 8 requires works to be in accordance with the code of construction practice. • Requirement 9 (a) (i to xii) and (b) (i to xiv) places a specific obligation in relation to the preparation of construction environment management plans. • Requirement 10 places a specific requirement for the preparation of plan in relation to measures at the outfall. • Requirement 11 (3) specifies that construction and operation of the authorised development must be carried out in accordance with the approved detailed LERMP. • Requirement 18 specifies the need for an operational asset management plan to be approved by the relevant planning authority. • Requirement 20 specifies the requirement for a detailed odour management plan to be submitted to

Reference	Relevant Representation Comment	Applicant's Response
		<p>and approved in writing by the relevant planning authority.</p> <ul style="list-style-type: none"> Where operational controls are required under existing regulations (such as the Environmental Permitting Regime), the Applicant considers there is no need for a section 106 agreement. <p>Taking into account the requirements within the dDCO (App Doc Ref 2.1) [AS-139]. and the controls under existing regulation. there is no need for a section 106 agreement in relation to management plans.</p>
<p>Climate Resilience 48.</p>	<p>The District Council notes the elements that have been scoped out of the assessment [para.2.7 and Table 2.8 of Climate Resilience chapter of the ES] including construction and decommissioning. At this stage, it is the District Council's view that decommissioning of the proposed ReCWWTP should be included as part of the assessment.</p>	<p>The Applicant asserts that it is appropriate for ES Chapter 9: Climate Resilience (App Doc Ref 5.2.9) [APP-041] to consider the operational phase only, since climate change will not have a discernible difference between the present-day and the construction timeframe in the 2020s. Any impacts arising from severe weather events during the construction phase will be managed by standard current construction practices, including measures in the Appendix 2.1 of the Part A of the Code of Construction Practice (App Doc Ref 5.4.2.1) [APP-068] and Appendix 2.2 of Part B of the Code of Construction Practice (App Doc Ref 5.4.2.2) [AS-161] which will be implemented through an approved CEMP.</p> <p>Requirement 8 of the dDCO (App Doc Ref 2.1) [AS-139] secures compliance with the Code of Construction Practice.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p><u><i>Decommissioning the proposed WWTP</i></u></p> <p>The Applicant refers to paragraph 5.4.27 of the Scoping Report (App Doc Ref 5.4.2.2) [APP-080] which sets out that <i>'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'</i>.</p> <p>In the scoping opinion, PINS were of the opinion that <i>"....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).</i></p> <p>In relation to this point the Applicant refers to the ES Chapter 2 (App Doc Ref 5.2.2) [APP-034] which included section 6.3 'Future decommissioning of the proposed WWTP'. This section explains that:</p> <ul style="list-style-type: none"> • There are no plans to decommission any part of the proposed WWTP

Reference	Relevant Representation Comment	Applicant's Response
		<ul style="list-style-type: none"> • 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 proposed 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. <p>Decommissioning of the proposed WWTP would be likely to follow a reverse sequence of construction and commissioning, along broadly similar lines as set out in the ES Chapter 2 Project Description (App Doc Ref 5.2.2) [APP-034] for the proposed and existing Cambridge WWTP.</p>
Carbon 51.52.	The elements that have been scoped out, including construction and decommissioning are agreed subject to issues raised below. It is considered in general terms however that a clear rationale has been provided to support the applicant's approach.	<p>The Applicant thanks the District Council for its broad agreement on the elements that have been scoped out.</p> <p>In paragraph 2.4.4 of ES Chapter 10 Carbon (App Doc Ref 5.2.10) [APP-042] the Applicant explains that the Application does not include the demolition of the existing facility or its redevelopment for low carbon housing and employment uses,</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>The District Council notes considerable public discourse on this issue and considers that the following matters should be explored and recommends the ExA seek their resolution:</p> <p>-Decommissioning of the proposed WWTP has been excluded from the carbon assessment due to the long lifespan of the development. It is noted that there are no proposals for decommissioning before 2050 making attempts to quantify carbon emissions associated with this difficult. Although the District Council agrees that quantifying these emissions would be a best estimation, the implications of decommissioning should form part of the whole life carbon assessment.</p> <p>-The District Council acknowledges that the proposed CWWTP development is designed for a long working life with the ability to adapt and expand in the future. This is positive from a climate resilience perspective, but consideration should be made for quantifying the carbon impact of possible future expansion plans. Although it is assumed that expansion plans would be subject to separate planning applications if and when required, the District Council recommends a section should be included within the whole life carbon assessment relating to future development of the site and the potential carbon emissions resulting from this as this may impact on the deliverability of net zero aspirations.</p>	<p>which will be approved through a separate planning permission. Carbon impacts associated with these activities are therefore not assessed in this chapter of the environmental statement, but they are considered the Strategic Carbon Assessment which accompanies the Application (App Doc Ref 7.5.2) [AS-206].</p> <p>In relation to decommissioning of the proposed WWTP, 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. There are no proposals to decommission the Proposed Development before 2050. It is anticipated that a future decommissioning exercise would likely take place in a world where low carbon plant and activities are commonplace.</p> <p>The ES Chapter 10 Carbon (App Doc Ref 5.2.10) [APP-042] is based on the Proposed Development as it stands and does not consider potential future changes which would be subject to separate assessment and planning process. Further expansion beyond the Proposed Development 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.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The outline Carbon Management Plan (CMP) (App Doc Ref 5.4.9.2) [AS 067] states that the Applicant will continue to monitor and report its annual operational footprint in line with its regulatory reporting requirements. The outline CMP (App Doc Ref 5.4.9.2) [AS 067] provides an outline of how the Applicant intends to achieve operational net zero emissions over the lifetime of the Proposed Development. It is a live plan that will be updated to a more detailed plan over time, covering updates on decisions that will impact operational emissions of the Proposed Development.</p>
Carbon 56.	<p>The District Council considers that the proposed mitigating measures set out at [para.2.9] are adequate. These measures focus on development design, in line with the target to deliver a net zero carbon development. The District Council considers carbon should be a primary metric of the evaluation process during the development design.</p>	<p>The Applicant notes the District Council considers carbon should be a primary metric of the evaluation process during development design. The Applicant has considered a number of factors in developing the design of the Proposed Development, of which carbon is one.</p> <p>The Applicant refers to Requirement 7 (Detailed Design, (2)) in the dDCO (App Doc Ref 2.1) [AS-139] which requires details to be submitted and 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.</p> <p>Objectives 7.1, 7.2 and 7.10 within section 11 of the Design and Access Statement (App Doc Ref 7.6) [APP-208] relate to the carbon. Through the design approval process, the local planning authority will be provided with further details</p>

Reference	Relevant Representation Comment	Applicant's Response
		demonstrating how carbon has been considered during the detailed development of design.
Carbon 57.	<p>Whilst the use of the "Rochdale envelope" parameters by the applicant as part of this DCO process is appropriate, the District Council is of the view that it is essential to ensure that the DCO drafting allows for a continual process of refinement of information and data provided to the District Council. As the scheme moves towards detailed design, the most accurate information should be made available to inform the development.</p>	<p>The Applicant notes the comment and looks forward to continuing close dialogue with the District Council on the ongoing design development for the Proposed Development.</p> <p>The Applicant refers to the dDCO Requirement 7 (Detailed design) in the dDCO (App Doc Ref 2.1) [AS-139]. This Requirement places a specific requirement on the Applicant for each phase of the authorised development to commence only when design details have been approved in writing by the relevant planning authority. These include, but are not limited to, the layout, scale, design and external appearance of any plant and buildings, landscape planting, highway design, details of electric vehicle parking provision. The details submitted must include an explanation of how they accord with the design objectives set out in section 11 of the Design and Access Statement (App Doc Ref 7.6) [APP-208] or an explanation of why this is not reasonably practicable.</p> <p>Through the design approval process the local planning authority will be provided with detailed information and data.</p>
Community 60. 61.	<p>In respect of the Public Rights of Way the District Council notes that that the extension to the B1047 does not include equestrian use. The District Council considers that if the public benefit of the proposals is to be fully realised, it would be beneficial to include bridleway use as part of</p>	<p>The Applicant refers the stakeholder to its answer to ExQ.1 7.24.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>this circular route which would connect to new developments at Marleigh as well as Cambridge.</p> <p>In addition, in terms of equestrian interests, the extent of the proposed new bridleway as part of the disused railway [Appendix 8.1.4 of Chapter 8 of ES] need to be considered. This should also form part of the biodiversity and landscape enhancements of this part of the area [para.3.4.11 of the LERMP].</p>	<p>In respect of the proposed new bridleway, the Applicant does not consider this should be part of the biodiversity and landscape enhancements or form part of the LERMP (App Doc Ref 5.4.8.14) [AS-066]. The Applicant is merely seeking to change the status of the existing trackway to a bridleway to facilitate connectivity.</p>
<p>Community 62.</p>	<p>The District Council wishes to ensure that adequate provision is made within the DCO to ensure cycle use by employees of the proposed CWWTP.</p>	<p>The Applicant refers to the ES Chapter 2 Project Description (App Doc Ref 5.2.2) [APP-034], specifically paragraphs 2.9.5, 3.8.20 and 3.8.24, where it outlines the improvement of the cycle ways to the Proposed Development and Table 2-23 which sets out the provision for 50 cycle parking spaces and indicates the inclusion of a segregated pedestrian and cycle access to the Proposed Development.</p> <p>The Applicant refers to paragraphs 3.2.5, 7.2.1 and all of sections 9, 10,11 and 12 of ES Volume 4 Chapter 19 Appendix 19.8 Operational Workers Travel Plan (App Doc Ref 5.4.19.8) [APP-149] which sets out how the Applicant intends to encourage active travel to the Proposed Development.</p> <p>Under Requirement 12 of the dDCO (App Doc Ref 2.1) [AS-139] a detailed operational workers travel plan must be submitted to, and approved in writing by, the relevant planning authority. The detailed operational workers travel plan must accord with the measures set out in the operational worker travel plan ES Volume 4 Chapter 19 Appendix 19.8 Operational Workers</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Travel Plan (App Doc Ref 5.4.19.8) [APP-149]. Through this approval process, the Applicant will agree the details of the plan with the LPA. As a result, the Applicant considers this response addresses this comment.</p>
<p>Community 63.</p>	<p>The District Council also wishes to ensure that the ExA is able to assess the impact of the recreational pressure on the Low Fen Drove grassland and hedges County Wildlife Site referred to in the LERMP [DOC ref.3.4.9. Para 3.4.11 considers the potential mitigation measures but this may not be sufficient to redirect footfall as this route is heavily trafficked.</p>	<p>The Applicant notes the comments and confirms that, para 3.4.11 of the LERMP (Doc ref 5.4.8.14) [AS-066] states that <i>'path layout and boundary treatment as well as signage and interpretation boards will be used to divert footfall pressure away from the Low Fen Drove Way Grasslands and Hedges CWS'</i>. Boundary treatment either side of paths within the landscape masterplan area is an effective mitigation against footfall away from defined paths. This type of measure is used successfully 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.</p> <p>User counts within the landscape masterplan area and at selected locations in proximity to the Proposed Development would be repeated twice per year for operational years 1 to 5 to understand how people are interacting with the recreational space and accessing the wider network of PRoW and permissive paths. The outcomes will be used to adaptively manage the landscape masterplan area.</p> <p>The Applicant also refers to paragraph 4.1.2 and 4.1.4 within section 4 of the LERMP (Doc ref 5.4.8.14) [AS-066] which confirms the intention to set up an Advisory Group. Through</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>this group, matters such as recreational uses can continue to be discussed and managed.</p> <p>Requirement 11 of the dDCO (App Doc Ref 2.1) [AS-139] secures compliance with the LERMP (Doc ref 5.4.8.14) [AS-066].</p>
Community 64.	<p>Based upon local patterns of use of existing public rights of way, especially by dog walkers, informal car parking areas have emerged using rural hardstanding areas close to the site. The expansion of and improvements to existing and proposed new rights of way poses a potential risk of intensification of car bourn visitors to the area for the purpose of using these rights of way for recreation. Further consideration of the most appropriate means to manage this issue will, the view of the District Council, be required to be addressed by conditions or other measures. Any such measures will also need to be kept under review.</p>	<p>The Applicant considers the risk of intensification of motorised vehicle traffic accessing the improved path network is low.</p> <p>Future changes in usage arising from other developments would be considered as part of the planning process for those developments. The recreational connectivity of proposed residential 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 access from those other developments would most likely be via walking or cycling routes, not by car.</p> <p>Noting that some future uncertainty may persist in this area, the Applicant proposes that 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 section 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 ExQ1.1.5 and AS-134).</p>

Reference	Relevant Representation Comment	Applicant's Response
Health 66.	<p>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.</p>	<p>The Applicant considered and sought advice from the District Council on the approach to engagement with the Gypsy, Roma and Traveller population. In December 2021 and January 2022, it was established there had been previous engagement with this community via the Traveller Liaison Officer at the District Council.</p> <p>Consultation was undertaken at Con 1 (between July and September 2020) and additional materials were hand delivered by the District council to the Fen Road traveller site, as well as posters and information materials being left at deposit locations. The Fen Road traveller site received direct mailings regarding the Application and consultation events.</p> <p>The Applicant was 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 the District Council, including most recently providing notice as per Section 56 of the 2008 Act.</p> <p>At request of the 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.</p> <p>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</p>

Reference	Relevant Representation Comment	Applicant's Response
Health 67.	<p>In respect of Traffic Plan Monitoring (Chapter 5.1.9), the reports states that controls will be put in place to prevent construction traffic from travelling through Horningsea and Fen Ditton. The CMTP also sets out that construction traffic must avoid the AM and PM peak periods as well as school pickup and drop off hours. The District Council will expect details on how this will be monitored, reported and enforced throughout the construction and operation phases of the development, to be made clear at the examination stage.</p>	<p>Officer at the District Council to ensure this group is included as part of any ongoing consultation and engagement activities.</p> <p>The Applicant notes the District Council's request for further details of the controls that will be in place. The Applicant would make the following comments, which it hopes the District Council will find helpful.</p> <p><u>Construction</u></p> <p>The monitoring and enforcement of the construction traffic movements is captured within Section 7 of the Construction Traffic Management Plan (App Doc Ref 5.4.19.7) [AS-109] and includes measures such as:</p> <ul style="list-style-type: none"> • scheduling systems to ensure deliveries where possible fall outside of the peak hours; • contractual requirements to attend pre-commencement meetings on permitted routes and requirements; • ANPR cameras along Horningsea; • compliance with FORS and CLOCS accreditation; • quarterly monitoring reports based on monitoring data; and • investigation of breaches and complaints with any relevant corrective actions agreed with the Cambridgeshire County Council and/or community members prior to implementation. <p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] secures compliance with the CTMP [AS-109].</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p><u>Operation of the Proposed Development</u></p> <p>A Travel Plan will be in place for the Proposed Development, which will include monitoring how the operational workforce make their journeys to work. This will be monitored for the first 5 years of operation as a request from Cambridgeshire County Council. Requirement 12 in the dDCO (App Doc Ref 2.1) [AS-139] will secure the requirement for the preparation of a detailed plan to accord with the outline Travel Plan (App Doc Ref 5.4.19.8) [APP 149]. This will be submitted to and approved by the local planning authority.</p> <p>The Applicant has prepared an Outline Operational Logistics Traffic Plan (App Doc Ref 5.4.19.10) [AS-111]. This will develop further measures for operational controls on traffic movements to and from the proposed WWTP. This would, amongst other information, state working hours, any restrictions on vehicle movements, and other measures such as monitoring.</p> <p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] secures compliance with the measures set out in the Community Liaison Plan (app Doc Ref 7.8) [AS-132].</p> <p>Further mitigation in relation to projected future growth and subsequent changes to traffic volumes as a result of committed developments would be managed through the policy objectives outlined within the Council's Local Transport and Connectivity Plan (LTCP), with reference to the 'decide and provide' approach.</p>

Reference	Relevant Representation Comment	Applicant's Response
Health 68.	The District Council will also seek to ensure an effective community liaison plan is put in place to enable proactive engagement with local communities and users throughout the construction and operation phases.	<p>The Applicant notes the comment and will continue to discuss the proposals set out in the Community Liaison Plan (App Doc Ref 7.8) with the District Council as part of its discussions on the management plans.</p> <p>Requirement 9 of the dDCO secures compliance with the Outline Community Liaison Plan (App Doc 7.8) [AS-132].</p>
Health 69.	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.	The Applicant has prepared the ES Appendix 12.3 Mental Wellbeing Impact Assessment (MWIA) (App Doc Ref 5.4.12.3) [AS-077], which does not recommend further Mental Wellbeing Impact Assessments. Comments or recommendations are set out in section 4 of ES Appendix 12.3 Mental Wellbeing Impact Assessment (MWIA) (App Doc Ref 5.4.12.3) [AS-077]. As no further action for further assessments is recommended, and so the Applicant does not consider there is a need for a Requirement.
Historic Environment 70.	Paragraph 4.2.12 of Historic Environment ES Chapter 13, the District Council notes that the magnitude of impact assessed in respect of Biggin Abbey, which is a Grade II* listed building, resulting from the construction of the new ReCWWT has been assessed as a "temporary minor adverse impact". It is also noted that Table 2-2 [of DOC ref.5.2.13] states that this equates to a small change in the assets setting. The District Council considers that this conclusion, given the period of construction, does not adequately reflect the level of impact on this Heritage Asset of high heritage value.	<p>The Applicant refers to sections 2.14 and 3 of the ES Chapter 2: Project Description (App Doc Ref 5.2.2.) [APP-034], which provides 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 Final Effluent Outfall, the Final Effluent and Storm pipelines (located within the Conservation Area and closest to Biggin Abbey) taking place over 12 months of the four year construction programme.</p> <p>In addition, the construction of the access to the proposed WWTP will be undertaken during the Phase 1 enabling works and access for the construction of the proposed WWTP will</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>subsequently be from the A14 junction, which will reduce the duration of temporary impacts of construction traffic on the Biggin Abbey (see ES Chapter 2: Project Description (App Doc Ref 5.2.2.) [APP-034]).</p> <p>Based on the above and the criteria set out in the assessment methodology for the historic environment, the Applicant stands by the conclusion of the assessment on Biggin Abbey in relation to the construction of the proposed Development.</p>
Historic Environment 70.	<p>Paragraph 4.2.43 of Historic Environment ES Chapter 13, the District Council in the Baits Bite Lock Conservation Area Appraisal [ref HE095] notes it provides an “important view east to Biggin Abbey”. The proposed development is said to “slightly detract” from this view. It is not clear whether the use of ‘slightly’ in this case is an assessment of significance as per the table at 2.3. and further clarity is needed.</p>	<p>The Applicant confirms the description ‘slightly detracts’ is part of the qualitative description of the harm the scheme would cause to the asset, not the formal description of the significant of effect. ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) [AS-030] confirms that the Baits Bite Lock Conservation Area has a heritage value of medium and that the Proposed Development would only result in a negligible adverse magnitude of impact, which gives rise to a slight adverse (not significant) effect.</p>
Historic Environment 70.	<p>Paragraph 4.3.5 identifies that the operation of the proposed development will result in negligible adverse impacts to the relevant heritage assets (i.e.). It acknowledges that the impacts would occur as a result of changes to the setting of the heritage assets which will reduce its contribution to their heritage value. It is also noted in paragraph 4.3.6 that the new lighting requirements and increased traffic movements will adversely affect the heritage value of the assets. As a result of the above, it is the opinion of the District Council</p>	<p>The Applicant considers embedded mitigation in the lighting design will reduce the amount of light spill. These measures are detailed within section 6 of the Lighting Impact Assessment (App Doc Ref 5.4.15.3) [AS-100]. The amount of lighting along Horningsea Road will increase but, due to the intervening distance and vegetation, will not cause more than a negligible impact and a slight adverse effect, which is not significant.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>that the changes do not equate to a negligible adverse effect but would instead be a minor/moderate adverse effect.</p>	<p>It is also noted that the dDCO Requirement 7 (Detailed design) (App Doc Ref 2.1) [AS-139], places a specific requirement for each phase of the authorised development to commence once design details have been approved in writing by the relevant planning authority. These details include operational lighting.</p> <p>The details submitted in relation to operational lighting must accord with the details set out in the lighting design strategy (App Doc Ref 5.4.2.5) [APP-072].</p> <p>Vehicle movement will increase from the A14 during operation of the Proposed Development. This traffic, however, will access the proposed WWTP site, using an access point directly opposite the A14 slip road and will not proceed further along the Horningsea Road. The additional vehicle movement will, therefore, cause a negligible impact and a slight adverse effect, which is not significant. The assessment of the impacts of vehicle movements is contained within the ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) [AS-038].</p>
<p>Historic Environment 71.</p>	<p>The District Council notes that in its overall assessment at para 5.6.1 the applicant concludes that “the Proposed Development will cause less than substantial harm to designated heritage assets” and that with “the application of the primary, secondary and tertiary mitigation ... it is predicted that the level of harm...will be at the lower end of less than substantial harm”. The District Council, whilst agreeing that the proposals will cause less than substantial harm for the reasons outlined above, consider the level of adverse effects identified through the assessments carried</p>	<p>The Applicant considers that the level of harm, although a spectrum, can only be categorised in the terms of lower or higher harm. Paragraphs 9.3.2 (relating to Biggin Abbey) and 9.4.2 (relating to Baits Bite Lock Conservation Area) within Appendix 13.1 Historic Environment Baseline Assessment (App Doc Ref 5.4.13.1) [AS-079], indicate the setting of these assets adds to their character and value. However, it also recognises the impact of modern infrastructure, in particular the visual</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>out where significant effects have been identified to Baits Bite Lock conservation area and to Biggin Abbey. These include the adverse effects from the proposed landscape mitigation to be greater than expressed in the applicant's assessment.</p>	<p>and noise impacts that the A14, on the setting's contribution to the character and value of the assets.</p> <p>Given the intervening distance and existing vegetation between the assets and the proposed WWTP, coupled with existing presence of the A14, although the harm is not at the lowest level of lower harm, it cannot be described as being at the higher end of less than substantial harm.</p>
<p>Landscape and Visual Amenity 73.</p>	<p>The District Council, as noted above, accepts the use of the Rochdale envelope parameters as outlined in Section 2.7 of the ES Landscape Chapter (Ch15). However, the District Council seeks a number of clarifications and specific details which it will raise with the applicant and the ExA during the examination. • The District Council has previously questioned the design approach and its use in this location. Noting that the applicants draw a different conclusion to the District Council on the suitability of the design approach to the landscape, the District Council also notes that the proposed landscape strategy accompanying the proposals is considered suitable. Concerns associated with the implementation and resilience of the landscape solution (including planting on the elevated bund) will require clarification from the ExA in the event that it concludes that the design approach to the plant is justified and appropriate. Consideration of alternative measures which can be employed should the trees and vegetation in this location fail to thrive should be included within the LERMP.</p>	<p>The Applicant notes the comment and responds as follows.</p> <p>The Landscape Masterplan contained within the Landscape, Ecological and Recreational Management Plan (LERMP) (App Doc Ref 5.4.8.14) [AS-066] shows the planting proposed on the earth bank. The LERMP (App Doc Ref 5.4.8.14) [AS-066] describes the management and watering regime that will be carried out to ensure the planting establishes and thrives and how failed planting will be replaced.</p> <p>All planting will be carried out in the winter months (during the dormant season) for the best chance of establishment.</p> <p>Paragraph 4.2.2 of the LERMP (App Doc Ref 5.4.8.14) [AS-066] sets out the requirements for watering. The new planting on the earth bank will be watered in periods of drought for the first five growing seasons after planting. New planting on the rest of the site will be watered, if required, in the first growing season during periods of prolonged drought.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Table 4.2 Proposed Management Post Planting in the LERMP (App Doc Ref 5.4.8.14) [AS-066] states that all trees, shrubs and hedgerow plants will be checked in September of each year and those that have failed to thrive will be replaced during the following planting season. If a particular species fails to thrive, a replacement species may be considered, with advice from a landscape architect.</p>
<p>Landscape and Visual Amenity 73.</p>	<p>Section 2.9 of the ES outlines the mitigation measures proposed with Table 2-7 referencing the LERMP. It is advised that the earth bank will be made up of soils excavated from the footprint and pipeline excavations. This statement is only within the Concept Plan description and is not repeated in the final design. Neither the LERMP nor the LVIA state whether this soil will be tested for appropriateness for the type of use proposed, particularly the planting. The District Council considers that this presents a risk that planting on the resultant bank will not mature or flourish in the manner envisaged and required to secure the landscape mitigation objectives. Further clarification on how this risk will be addressed will therefore need to be provided to the examination.</p>	<p>The Applicant notes the comment and responds as follows.</p> <p>The soil is being stripped from arable farmland and would be subject to the requirements specified in Appendix 6.3: Outline Soil Management Plan (App Doc Ref 5.4.6.3) [APP-083] and would therefore be suitable for reuse for planting. The management plan includes provision for monitoring reinstated soils to ensure they are functional to the required level and to identify and rectify deficiencies. Requirement 9 of the dDCO (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 the outline soil management plan. 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, which includes detailed environmental management plans, of which the outline SMP is one.</p> <p>The specification of topsoil and subsoil depths on the earth bank, which would affect the establishment and growth of the planting, has not yet been detailed. Requirement 7 (Detailed</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Design), and Requirement 11 (LERMP) within the dDCO (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 details of the design of the earth bank and specifications in relation to planting.</p>
<p>Landscape and Visual Amenity 73.</p>	<p>The methodology identifies the language used for the various assessments such as Major, Moderate, Minor and Negligible, however, the body of the LVIA uses the terms Large, Moderate, Slight and Negligible. Clarification and consistency on the use of such terms will need to be provided throughout the examination process to match the methodology.</p>	<p>The Applicant notes the comment but does not agree that the methodology has not been followed consistently in the landscape and visual impact assessment (LVIA).</p> <p>Appendix 15.5: Landscape and Visual Assessment Methodology (App Doc Ref 5.4.15.5) [APP-131] sets out the terms used for the LVIA. Magnitude of landscape and visual change is assessed in terms of major, moderate, minor, negligible or no change. The significance of effect (derived by weighing the sensitivity of the receptor against the magnitude of change) is assessed in terms of large, moderate, slight and neutral.</p> <p>Chapter 15: Landscape and Visual Amenity (App Doc Ref 5.2.15) [APP-131] is the LVIA. In the assessment, the terms major, moderate, minor, negligible or no change are used to evaluate the magnitude of change. The terms large, moderate, slight and neutral are used to evaluate the significance of effect. The terms are used consistently as set out in the methodology in the assessment but it is acknowledged that the term moderate is used for both magnitude of change and significance of effect in the methodology and this may have given the impression the methodology has not been followed.</p>

Reference	Relevant Representation Comment	Applicant's Response
<p>Landscape and Visual Amenity 73.</p>	<p>The methodology references a number of guidance documents including GLVIA 3rd Edition. The Landscape Institute also produces a 'Technical Guidance Note 2/19 Residential Visual Amenity' which provide additional guidance for the assessment of impact on residential visual amenity. The District Council strongly recommend that this document is referenced and used in conjunction with the others in the assessment process.</p>	<p>The Applicant notes the comment and responds as follows.</p> <p>The requirement for a residential visual amenity assessment (RVAA) was not included in appendix 4.1: Scoping Opinion (App Doc Ref 5.4.4.1) [APP-079] or Appendix 4.2: Scoping Report (App Doc Ref 5.4.4.2) [APP-080].</p> <p>LVIA and RVAA follow a related but different methodology. The landscape Institute describes an RVIA as: <i>'a stage beyond LVIA'</i> and explains the difference between the two: <i>'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'</i>.</p> <p>However, the LVIA does assess the effects on views of residential receptors but the baseline survey was from publicly accessible land, not houses or private gardens. Receptors were also grouped under a single assessment where effects of their views would be similar. A RVAA of residential properties with a view of the Proposed Development would come to similar conclusions on the level of effects as the LVIA does.</p> <p>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</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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 these engagements.</p>
<p>Noise & Vibration 76.</p>	<p>The District Council notes that the Construction and Environment Management Plan ('the CEMP') makes reference to S.61 of the Control of Pollution Act 1974 and consent being sought pursuant to that provision. The District Council considers that this should be clarified owing to the potential dual regulation through both the planning and environmental health legislation). The District Council recommends that the CEMP provides the primary regulatory framework for the developer to operate within rather than utilising the S.61 consent through the Control of Pollution Act 1974.</p>	<p>The Applicant will discuss this matter with the District Council and record the outcome in the Statement of Common Ground.</p>
<p>Noise & Vibration 77.</p>	<p>It was noted that within the CEMP, that there is no information for the applicant to notify the District Council of any complaints received other than through liaison meetings with third parties. As such, the District Council recommends that regular monitoring through the Council's Environmental Health department should instead or in addition be secured through DCO requirements.</p>	<p>The Applicant notes that Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-101] secures the provision of a noise and vibration management plan for each phase of the development, to be submitted and approved alongside the CEMP for such phase. Through this approval process, the Applicant will agree the complaint notification procedure and monitoring schedule with the District Council. The Applicant, therefore, considers that Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-101] sufficiently addresses the need to monitor such complaints.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>This is also explained in paragraph 7.7 of the Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [APP-068], which details matters the noise and vibration management plan must cover, including reference to the Community Liaison Plan and monitoring. Requirement 9 also secures compliance with the Community Liaison Plan (App Doc Ref 7.8) [APP-209]. Requirement 8 of the dDCO (App Doc Ref 2.1) [AS-101] secures compliance with the Code of Construction Practice.</p>
<p>Traffic & Transport 79.</p>	<p>The District Council notes the response of Cambridgeshire County Council as the Highway Authority for the area to the proposals. Notwithstanding the conclusions of the Local Highway Authority on the transport matters, there remain a number of areas that the District Council expects to comment further upon as follows:</p> <ul style="list-style-type: none"> • It is noted that the development will involve large and heavy vehicles using existing roads which are used by pedestrians, equestrians and cyclists (including the B1047 (Horningsea Road). As such, this presents considerable risk of conflict that needs not be minimised both thorough the design and management of vehicle speeds and flows across junctions and along links 	<p>Section 2.9 of the ES Chapter 2: Project Description (App Doc Ref 5.2.2) [APP-034] explains the main access to the proposed WWTP will be scheduled so that the use of Horningsea Road is minimised.</p> <p>The ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) [AS-038] provides an assessment of traffic and transport impacts including impacts to users of Horningsea Road. The assessment has considered various measures that would be in places to control potential impacts. In addition to the scheduling of the permanent access as a design measure the assessment considers further mitigation which is set out within the Construction Transport Management Plan (CTMP) (Application Doc Ref 5.4.19.3) [AS-109].</p> <p>This document sets out the commitment to manage vehicle routes and timings to ensure that construction access points are clearly known to users of the roads/footways/cycleways and deliveries are organised to avoid the busiest times on the network in the morning, evening and at school pick up times in particular. Details of the commitment are as follows.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Section 5.2 (Temporary access points and construction road signage) which requires the use of temporary signage along all proposed construction haul roads. As a minimum this will include internal haul road speed limits, warning (hazard signs), potential vehicle or pedestrian crossing points and distances to destinations.</p> <p>Section 6.3 Adherence to Designated Routes</p> <p>Section 6.9 Facilitate safe movement of users of the highway which requires maintaining the existing footway / cycleway to the west of the Horningsea Road carriageway at all times with suitable barriers separating the footway from the works.</p> <p>Section 6.9 avoid HGV movements through Waterbeach during school drop-off and pick-up hours throughout term time.</p> <p>Section 6.9 requirement to provide connectivity/access to community facilities and residential properties during works.</p> <p>The CTMP (Application Doc Ref 5.4.19.3) [AS-109] sets out the commitment to provide community liaison that ensures construction information, such as specific high volume activities or changes to access points as construction works are completed, is provided to ensure this is communicated and can be disseminated with the communities affected.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Section 3 'CTMP Management and Communication' of the CTMP (Application Doc Ref 5.4.19.3) [AS-109] sets out the commitment to provide community liaison that ensures construction information, such as specific high- volume activities or changes to access points as construction works are completed, is provided to ensure this is communicated and can be disseminated with the communities affected.</p> <p>Requirement 7 (Detailed design) of the dDCO (App Doc Ref 2.1) [AS-139] places a specific requirement for each phase of the authorised development to commence once design details have been approved in writing by the relevant planning authority. These include, but are not limited to, highway design details.</p> <p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] secures the provision of a CTMP (Application Doc Ref 5.4.19.3) [AS-109] for each phase of the Proposed Development, to be submitted and approved by the local planning authority alongside the CEMP for such phase.</p> <p>Through this approval process, the Applicant considers Requirements 7 and 9 of the dDCO (App Doc Ref 2.1) [AS-139], together with the approval of design details and management measures, sufficiently address this comment.</p>
& Transport 79.	The development is likely to result in temporary or extended closure of rights of way close to the construction site. It is important that through the CEMP, such closures	The Applicant notes the comments and can confirm that the project controls proposed as part of the Construction Transport Management Plan (CTMP) (App Doc Ref 5.4.19.3)

Reference	Relevant Representation Comment	Applicant's Response
	<p>are minimised, and safe alternative links provided where possible to ensure that safety of users of the rights of way and access to key infrastructure such as Fen Ditton School is not compromised.</p>	<p>[AS-109] include a commitment to provide alternative public right of way routes where sections are required as part of the construction work. Also, the CTMP (App Doc Ref 5.4.19.3) [AS-109] provides a commitment to provide a controlled crossing point where a construction area interacts with a public right of way to ensure that the safety and access is maintained for users.</p> <p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] secures the provision of a CTMP (App Doc Ref 5.4.19.3) [AS-109] for each phase of the development, to be submitted and approved alongside the CEMP for such phase.</p> <p>Through this approval process, the Applicant considers that Requirement 9 of dDCO (App Doc Ref 2.1) [AS-139] and the approval management measures sufficiently addresses this comment.</p>
<p>Traffic & Transport 79.</p>	<p>The application seeks to demonstrate how the assessment of access options to the site was undertaken. The proposed access arrangements use local road access to/from the A14 and the alternation of junctions that will increase heavy vehicle movements at and across existing local road junctions. The District Council has expressed concerns over such arrangements and the potential conflict that this gives rise to, in comparison with a direct vehicle access from the A14.</p>	<p>The Applicant notes the comments, made by the District Council and provides the following responses.</p> <p>Discussions with National Highway have determined that a new junction on the A14 to serve the Proposed Development was not acceptable. The principal reasons for this conclusion were the Department for Transport (DfT) policy (<i>DfT Circular 01/2022 'Strategic Road network and the delivery of sustainable development'</i>) and highway safety concerns.</p> <p>The assessment of the options determined the existing Junction 34 of the A14 (Horningsea Road) was an appropriate access to</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>the proposed WWTP from the A14, with westbound traffic accessing the site, and eastbound traffic exiting the site using Junction 33 of the A14 (Milton Interchange grade separated junction) to make a U-turn to continue their journeys.</p> <p>This is supported in ES Volume 4 Chapter 19 Appendix 19.3 Transport Assessment (App Doc Ref 5.4.19.3) [AS-108a, AS-108b and AS-135] and ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) [AS-038] where results show that, with the mitigation proposed in section 6.9 of the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) [AS-109], construction deliveries are restricted to outside the peak traffic hours, including school pick up time, and so the impact on the existing road network and junctions is acceptable.</p>
Traffic & Transport 79.	<p>The District Council remains concerned that the proposed access solution has the potential to give rise to “rat running” during both construction and operation phases of the development. Effective control of arrival and departing vehicles (especially heavy vehicles) will be required alongside a monitoring process for enforcement if adverse environmental and safety effects are not to arise. The mechanism for implementing, managing and monitoring such a process should be developed with input and engagement from the District Council.</p>	<p>The Applicant notes the comment in relation to ‘rat running’ and the requirement for controls on arrival and departure times for vehicle movements. In relation to construction phase the Applicant refers to the Construction Management Plan (CTMP) (App Doc Ref 5.4.19.7) [AS-109] which sets out the commitment to control construction traffic to appropriate and defined routes only through use of monitoring of construction-related vehicles.</p> <p>Additionally, section 6.3 ‘Adherence to Designated Routes’ of the CTMP (App Doc Ref 5.4.19.7) [AS-109] sets out a requirement for ANPR cameras along the following routes, subject to LHA approval or other relevant stakeholders.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>On Horningsea Road, located immediately north and south of the A14 signalised junctions; 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.</p> <p>The community liaison commitment set out in section 3 'CTMP Management and Communication' of the CTMP (App Doc Ref 5.4.19.7) [AS-109] would include engaging with the District and County Councils and National Highways to ensure the monitoring process is agreed and can be reported back to relevant stakeholders.</p> <p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] secures the provision of a detailed community liaison plan which must accord with the measures set out in the Community Liaison Plan (App Doc Ref [AS-132] for each phase of the development, to be submitted and approved alongside the CEMP for such phase.</p> <p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] secures the provision of a CTMP for each phase of the development, to be submitted and approved alongside the CEMP for such phase.</p> <p>In relation to the operational phase, the Applicant refers to the outline Operational Logistics Traffic Plan (OTLP) (App Doc Ref 5.4.19.10) [AS-111], which, like the construction phase,</p>

Reference	Relevant Representation Comment	Applicant's Response
		will include controls on vehicle movements to ameliorate impacts to the local road network. Requirement 19 of the dDCO (App Doc Ref 2.1) [AS-139] secures the provision of a detailed OTLP which must accord with the measures set out in the outline Operational Logistics Traffic Plan (OTLP) (App Doc Ref 5.4.19.10) [AS-111].

Table 3-3 Cambridgeshire County Council (RR-001)

Reference	Relevant Representation Comment	Applicant's Response
3 Agricultural land and Soils	<p>3.1 The Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) contains Policy 24: Sustainable Use of Soils, which seeks to protect best and most versatile agricultural land and the soils that make that land so valuable for agriculture. The Council will seek soil resource is used sustainably and that a Management Plan is developed to ensure the proposed mitigation is delivered.</p> <p>Policy 24 also steers waste management development away from best and most versatile agricultural land, and the Council will be reviewing the design alternatives considered to ensure that land-take of the proposed development is minimised. Please note this includes consideration of ecology and landscape mitigation measures.</p>	<p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] requires the preparation of detailed plans including a soil management plan (SMP) which must accord with the measures set out in the outline Soil Management Plan (App Doc Ref 5.4.6.3) [AS-060]. 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 which includes detailed environmental management plans, of which the SMP is one.</p> <p>The Applicant notes the comments in relation to Policy 24 and confirms that land required has been minimised to reduce the requirement for BMV agricultural land.</p>

Reference	Relevant Representation Comment	Applicant's Response
4 Biodiversity	<p>4.1 The scheme has been sensitively designed for biodiversity, taking on board comments raised at pre-application stakeholder biodiversity workshops with the Applicant. The Council considers that overall, a thorough ecological assessment has been undertaken. However, it has not been possible to review confidential documents in time for these Relevant Representations - the Council received unredacted versions from the Applicant close to the deadline. This includes badger reports.</p> <p>The Council has also asked for a copy of the Biodiversity Net Gain (BNG) spreadsheet, and associated maps, so that the Biodiversity Net Gain assessment can be fully reviewed.</p>	<p>4.1</p> <p>The Applicant welcomes the recognition of the sensitive approach to design as informed through Technical Working Groups.</p> <p>The Applicant confirms that confidential reports have been provided and that matters in relation to protected species will be agreed through the Statement of Common Ground (SoCGs).</p> <p>The Applicant undertook baseline habitat surveys along Low Fen Drove Way Grassland and Hedges CWS in 2020, with National Vegetation Classification surveys in July 2021. These surveys are reported in Table 26 of 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 County Wildlife Sites (CWSs).</p> <p>ES Chapter 8 Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163] includes appendices A-J (which includes the BNG spreadsheets and associated maps). The tables in the appendices E to J have been directly copied from the Biodiversity Metric 3.0 calculation tool.</p> <p>Appendix A includes the figures/maps showing baseline habitats, proposed habitats, map of the high and medium distinctiveness baseline habitats, and a map of retained habitats.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>4.2 The Environmental Statement (5.2.8 Environmental Statement - Volume 2 - Chapter 8 – Biodiversity) [APP-040] identifies potential adverse impacts on the following ecological receptors:</p> <p>a. wildlife sites: Stow-Cum-Quy Fen SSSI, River Cam County Wildlife Site (CWS), Allicky Farm Pond CWS, Low Fen Drove Way Grassland & Hedges CWS</p> <p>b. habitats: veteran trees, hedgerows and other habitats</p>	<p>Appendix D includes a page on detailed results taken from the Biodiversity Metric Calculation Tool.</p> <p>Appendix E includes a summary on pre-development baseline habitat units.</p> <p>Appendix F includes a summary on pre-development baseline hedgerow units.</p> <p>Appendix G includes a summary on pre-development baseline river units.</p> <p>Appendix H includes a summary on post-development habitat units.</p> <p>Appendix I includes a summary on post-development hedgerow units.</p> <p>Appendix J includes a summary on post-development river units.</p> <p>The Applicant also notes that the metric spreadsheets will be provided to the LPA for their review in relation to Requirement 11 of the dDCO (App Doc Ref 2.1) [AS-139]. This has been discussed in ongoing consultation meetings and recorded in the SoCG.</p> <p>The Applicant will update the ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163] for Deadline 2.</p> <p>4.2 The Applicant acknowledges the summary of the adverse impacts as identified within the ES Chapter 8 Biodiversity (App Doc Ref 5.2.2) [AS 026]. In relation to the ES Chapter 8</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>c. protected species: water vole, bats, badgers, notable plants</p> <p>4.3 The Council is concerned that the documentation submitted doesn't demonstrate how these adverse impacts will be adequately mitigated / compensated as part of the scheme.</p> <p>Of particular concern is:</p> <ul style="list-style-type: none"> a. Protected Sites - Habitat Regulations Assessment does not consider all Protected Sites 	<p>Biodiversity (App Doc Ref 5.2.2) [AS 026] the Applicant notes there are no residual significant adverse effects reported to the following:</p> <p>wildlife sites: Stow-Cum-Quy Fen SSSI, Allicky Farm Pond CWS, Low Fen Drove Way Grassland & Hedges CWS; veteran trees; and, protected species.</p> <p>A moderate adverse effect in relation to infrequent high flow events and local scour at the Final Effluent Outfall is reported for the river Cam which is also a CWS.</p> <p>A moderate adverse effect in relation to ditches permanently lost from construction of the proposed WWTP and landscape masterplan is reported. However this Applicant notes this will be corrected in an update to Chapter 8 to account for mitigation provided by compensatory ditches provide din works ae 39. 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.</p> <p>A moderate beneficial effect is identified in relation to habitats within the land required for the landscape masterplan which is significant is reported.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>b. Stow-cum-Quy Fen SSSI – inadequate mitigation for adverse recreational and hydrological impacts</p>	<p>A slight adverse effect which is not significant is reported in relation to bats until vegetation established when effect is moderate beneficial and significant is reported.</p> <p>4.3 In relation to comments raised in relation to assessments and mitigation the Applicant confirms the following.</p> <p>a) <u>Protected Sites</u></p> <p>ES Chapter 8 Appendix 8.15 HRA Screening Report (App Doc Ref 5.4.8.15) [AS-068] and ES Chapter 8 Appendix 8.16 Habitats Regulations Assessment Report HRA (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. The sites considered within the HRA have been discussed with Natural England who have indicated that they are content with the sites considered. The ES Chapter 8 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.</p> <p>The sites considered within the HRA have been discussed with Natural England who have indicated that they are content with the sites considered. This is recorded in its SoCG.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>b) <u>Stow-cum-Quy Fen SSSI</u> <u>Recreational user impact</u></p> <p>In relation to recreational usage, the Applicant has assessed the impact of recreational users and this is set out in the ES Chapter 8: Biodiversity section 4 (App Doc Ref 5.4.8) [AS-026].</p> <p>The LERMP (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 successfully 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 the LERMP (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.</p> <p>The assessment has not identified significant residual effects on this receptor, however recognising the uncertainty in relation to predicting how people may use this area, the Applicant has included within the LERMP (App Doc Ref 5.4.8.14) [AS-066] the requirement to complete user surveys and the intention to set up an Advisory Group. Through this group matters such as recreational users can continue to be discussed and managed.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The Applicant will continue to engage with relevant stakeholders including, but not limited to, the County 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.</p> <p>The requirements within the LERMP (App Doc Ref 5.4.8.14) [AS-066] are secured by Schedule 2 of Requirement 11 of the dDCO (App Doc Ref 2.1) [AS-139] relating to the detailed landscape masterplan and LERMP, which will be approved by the Local Planning Authority. Requirement 11 of the DCO (App Doc Ref 2.1) [AS-139] fulfils this requirement and requires the detailed plan accords with the LERMP (App Doc Ref 5.4.8.14) [AS-066].</p> <p>The Applicant believes this, plus the commitment to an adaptive management approach (paragraph 5.1.5 of the LERMP) (App Doc Ref 5.4.8.14) [AS-066] are more than sufficient to monitor and manage any potential future increases in recreational pressure that may occur.</p> <p><u>Hydrological impacts</u> 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 in August 2023 to discuss proposals for groundwater protection and monitoring.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>c. Low Fen Drove Way Grasslands and Hedges CWS – condition survey work hasn't been completed and not all impacts have been identified. Residual adverse impact from lighting scheme has not been addressed.</p> <p>Opportunities for enhancement to CWS have been missed.</p>	<p>At the meeting, it was agreed that the Applicant would provide an Environmental Quality monitoring report (water), 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. An outline of the Water Quality Monitoring Plan has been provided as part of the Applicant's submission at Deadline 1.</p> <p>In relation to the Final Effluent Outfall, the Applicant refers to the outline Outfall Management and Monitoring Plan (App Doc Ref 5.4.8.24) [AS-073]. The plan requires monitoring of the river in the area of the Final Effluent Outfall to assess whether or not scour has occurred, and to remedy it should it occur. Requirement 22 of the dDCO (App Doc Ref 2.1) [AS-010] requires the preparation of detailed plan to be submitted to and approved by the local planning authority.</p> <p>c) <u>Low Fen Drove Way Grasslands and Hedges CWS</u></p> <p><i>Condition assessment:</i> The Applicant undertook baseline habitat surveys along Low Fen Drove Way Grassland and Hedges CWS in 2020, with National Vegetation Classification surveys in July 2021. This survey effort is reported in Table 2-6 of 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 Fen Drove Way Grassland and Hedges CWS.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p><u>Residual lighting impacts:</u></p> <p>In relation to the lighting assessment, the approach to assessment and receptor selection has been discussed and agreed with the local planning authority.</p> <p>The assessment considers the measures indicated in ES Volume 4 Chapter 2 Appendix 2.5 Lighting Design Strategy (App Doc Ref 5.4.2.5) [APP-072] which states that 'the installation shall be designed to avoid light pollution beyond the site boundary and upwards into the surrounding atmosphere, particularly in rural areas'.</p> <p>The assessment is presented in the ES Chapter 15 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 provided within Table 4-4 in the ES Chapter 15 Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100]. Measures within Table 4.4 are secured by the following:</p> <p>Requirement 8 of the dDCO (App Doc Ref 2.1) [AS- 010]: 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. This includes sections within the CoCP relating to lighting controls.</p> <p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS- 010]: no phase of the authorised development is to commence until a construction environmental management plan</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>for that phase has been submitted to and approved by the relevant planning authority.</p> <p>Requirement 14 of the dDCO (App Doc Ref 2.1) [AS- 010]: construction lighting will require a detailed construction lighting design strategy, which is to be submitted to, and approved in writing by, the relevant planning authority. This shall accord with the measures set out in ES Volume 4 Chapter 2 Appendix 2.5 Lighting Design Strategy (App Doc Ref 5.4.2.5) [APP-072].</p> <p>Requirement 7 (Detailed design) of the dDCO (App Doc Ref 2.1) [AS-139]: requires detailed design information relating for the works proposed in that phase, to be submitted to, and approved in writing by, the relevant planning authority.</p> <p>The details submitted in relation to operational lighting must accord with the details set out in ES Volume 4 Chapter 2 Appendix 2.5 Lighting Design Strategy (App Doc Ref 5.4.2.5) [APP-072].</p> <p>In relation to lighting the Low Fen Drove Way Grasslands and Hedges CWS, this area is represented by receptors LR2, and LR3 in the ES Chapter 15 Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100]. Section 6.4 of that document, Tables 6-1 and 6-2 of the assessment conclude the residual effect on both LR2 and LR3 is none/negligible for both construction and operation respectively.</p> <p>The dDCO Requirement 7 (Detailed design) (App Doc Ref 2.1) [AS-139], places a specific requirement for each phase of the</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>d) River Cam CWS – inadequate assessment of impacts of discharging water into River Cam at new outfall. Further modelling of storm water events and details of surcharge from new treatment plant is required.</p>	<p>authorised development to commence once design details have been approved in writing by the relevant planning authority. These details include operational lighting.</p> <p>The details submitted in relation to operational lighting must accord with the details set out in the ES Volume 4 Chapter 2 Appendix 2.5 Lighting Design Strategy (App Doc Ref 5.4.2.5) [APP-072].</p> <p>On this basis there are no adverse residual lighting effects that require further consideration.</p> <p><u>Opportunities for enhancement:</u> The Applicant disagrees that opportunities for enhancement of the CWS have been missed. The Order Limits have sought to minimise the extent of overlapping with the CWS.</p> <p>Proposals to enhance the CWS are provided at paragraphs 3.4.9, 3.4.10 and 3.4.11 of the Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [AS-066]. These include the creation of new semi-improved neutral grassland to buffer the CWS, providing opportunities to expand the CWS. This habitat inclusion 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.</p> <p>d) <u>River Cam CWS</u></p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Impacts of lighting during construction unknown. Insufficient evidence to demonstrate adequate mitigation during construction / operational phase.</p>	<p><u><i>Discharge of treated water to river Cam</i></u> The Applicant disagrees that there is inadequate assessment of impacts of discharging water into the river Cam at Final Effluent Outfall.</p> <p>ES Chapter 20 Water Resources (App Doc Ref 5.2.20) [AS-040] includes the following appendices which include detailed modelling of the Final Effluent Outfall.</p> <ul style="list-style-type: none"> ES Volume 4 Chapter 20 Appendix 20.10 Storm model report (App Doc Ref 5.4.20.10) [APP-160] <p>Environmental Statement - Volume 4 - Chapter 20 -Appendix 20.7 - Outfall CFD Report (App Doc Ref 5.4.20.7) [APP-157]</p> <p>ES Chapter 20 Appendix 20.5 Fluvial Modelling Report (App Doc Ref 5.4.20.5) [AS-113]</p> <p>ES Chapter 20 Appendix 20.6 3D Velocity Mixing Report (App Doc Ref 5.4.20.6) [AS-114]</p> <p>ES Volume 4 Chapter 20 Appendix 20.1 Flood Risk Assessment (App Doc Ref 5. 4.20.1) [APP-151]</p> <p>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 the river Cam's water quality is moderate (beneficial) and significant, with regulatory stormwater discharge compliance monitoring proposed. 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).</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The impact of treated effluent discharge from the proposed Final Effluent Outfall on the river Cam's 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).</p> <p><u>Lighting impacts</u></p> <p>The applicant notes that there is no operational lighting proposed that would alter the current light levels in the river Cam CWS.</p> <p>In relation to construction lighting, the Applicant can confirm this matter has been subject to further discussions with the County Council. Chapter 2 of the ES (App Doc Ref 5.2.2) [APP-034] indicates that the works in the area of the Final Effluent Outfall would last up to 12 months, with the works within the river being 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.</p> <p>The closest project related light source to the river Cam, other than Final Effluent Outfall is the compound.</p> <p>The approach to the assessment and receptor selection has been discussed and agreed with the local planning Authority. This assessment is presented in the ES Chapter 15 Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100].</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>e. Allicky Farm Ponds CWS – inadequate mitigation / monitoring of adverse hydrological impacts</p>	<p>The mitigation measures considered in the assessment, and how they are secured, are explained in the response to the information provided for the Low Fen Drove Way Grasslands and Hedgerows CWS, which can be found above.</p> <p>In relation to lighting and the river Cam CWS, this area is represented by receptor LR13 in the 5.4.15.3 ES Chapter 15 Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100]. Section 6.4 of that document contain Tables 6-1 and 6-2, the contents of which conclude that the residual effect to LR13 is none/negligible, for both construction and operation respectively.</p> <p>On this basis there are no adverse residual lighting effects that require further consideration.</p> <p>e) Allicky Farm Ponds CWS The Applicant disagrees that there is inadequate mitigation / monitoring of adverse hydrological impacts.</p> <p>The ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [AS-026] does not identify significant effects to this receptor as a result of construction, operation or maintenance of the Proposed Development.</p> <p>ES Chapter 20 Water Resources (App Doc Ref 5.2.20) [AS-040] assesses the risk of accidental spills and leaks from the proposed WWTP migrating in groundwater through the west</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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 which is explained in Environmental Statement - Volume 4 - Chapter 20 - Appendix 20.8 Update to Contaminant Transport Model (App Doc Ref 5.4.20.8) [APP-158].</p> <p>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.</p> <p>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. The Applicant is in discussion with the Environment Agency in relation to groundwater level and water quality monitoring of hydrological receptors, including Allicky Farm Pond CWS. A draft Outline Water Quality Management Plan has been agreed in principle with the Environment Agency and is included in the Applicant's submission at Deadline 1. The final version of the plan, following approval from the Environment Agency, will be submitted at Deadline 2.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>f. Water Vole – insufficient evidence to demonstrate mitigation is adequate and can be delivered as part of the scheme</p>	<p>The Applicant also refers to the following which secure the requirement to agree the approach to monitoring: Schedule 2 of Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] requires a construction environmental management plan (CEMP) to include a detailed water quality management plan. The CEMP will be submitted to, and approved by, the relevant planning authority. Requirement 22 of the dDCO (App Doc Ref 2.1) [AS-139] requires an approved water quality monitoring plan prior to the start of the operation of the Proposed Development.</p> <p>f) Water Vole The Applicant disagrees that there is insufficient evidence to demonstrate mitigation is adequate and can be delivered as part of the Proposed Development.</p> <p>Water vole mitigation and monitoring is outlined within the ES Volume 4 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 after the DCO has been made, is acceptable to Natural England (Letter of No Impediment issued in January 2023). The area of Works Plan 32 will include 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 of the dDCO (App Doc Ref 2.1) [AS-139] requires detailed plans to be prepared in relation to the Final Effluent Outfall and Works Plan 32 (see Works Plans (App Doc</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>g. Bats – insufficient evidence to demonstrate impact of scheme on foraging / commuting bats</p>	<p>Ref 4.3) [AS-150]). 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.</p> <p>g) Bats</p> <p>The Applicant undertook surveys as outlined in Table 24 of the 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 a 100m buffer; bat activity transects within the proposed WWTP, the existing Cambridge WWTP and adjacent to the river Cam, including the Final Effluent Outfall to the river Cam; and static surveys at four locations within the Order Limit.</p> <p>The results of the surveys are provided within ES Volume 4 Chapter 8 Appendix 8.7 Bat Technical Appendix (App Doc Ref 5.4.8.7) [APP-092], and the impacts are assessed within ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [AS-026].</p> <p>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 (see Table 8-12 of ES Volume 4 Chapter 4 Appendix 4.2 Scoping Report (App Doc Ref 5.4.4.) [APP-080]), with limitations presented within Appendix 8.7 of the 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</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>h. Biodiversity Net Gain – scheme does not adequately demonstrate how it will deliver no net loss and the proposed 20% BNG. Scheme is unlikely to deliver 20% BNG for river units.</p>	<p>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.</p> <p>h) Biodiversity Net Gain The Applicant disagrees that the Application does not adequately demonstrate how it will deliver no net loss. The ES Chapter 8 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 Project Implementation of the ES Chapter 8 Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163] sets out how BNG will be secured. In summary, this would be through the following: Landscape masterplan (as required by dDCO Requirement 11 (App Doc Ref 2.1) [APP-010]) Provision of compensatory habitat as required as part of the water vole licence (as approved by the local planning authority in relation to dDCO Requirement 10 (App Doc Ref 2.1) [APP-010]) Application of the ES Volume 4 Chapter 2 Appendix 2.1 Code of Construction Practice Parts A and B (App Doc Refs 5.4.2.1 and 5.4.2.2) [APP-068 and AS-161] (as required by dDCO Requirements 8 and 9 (App Doc Ref 2.1) [APP-010]) Likely conditions within licences which relate to habitat provisions for water vole</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>i)Code of Construction Practice Part A [APP-068] does not provide protection for all ecological receptors during construction, as identified in the Environment Statement.</p>	<p>Table 7-1 in section 7 of the BNG report (App Doc Ref 5.4.8.13) [AS-163] summarises the future monitoring mechanisms to implement and monitor created and reinstated habitats.</p> <p>Requirement 11 of the dDCO (App Doc Ref 2.1) [APP-010]) secures the requirement for a detailed LERMP to be submitted for approval. It must accord with the measures set out in the LERMP (App Doc Ref 5.4.8.14) [AS-066] 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 under the operational outfall management and monitoring plan. No phase of the authorised development is to commence until a detailed landscape ecological and recreational management plan (detailed LERMP) has been submitted to and approved by the relevant planning authority.</p> <p>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 the ES Chapter 8 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 for Deadline 2 to include updated figures.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>i) Code of Construction Practice Part A [APP-068]</p> <p>The Applicant asserts that at the CoCP does provide protection for all ecological receptors during construction. The ES Volume 4 Chapter 2 Appendix 2.1 Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [APP-068], Code of Construction Practice Part A and ES Volume 4 Chapter 2 Appendix 2.2 Code of Construction Practice Part B (App Doc Ref 5.4.2.2) [AS-161] include provisions in relation to the following ecological receptors, these are set out as follows:</p> <p>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)</p> <p>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)</p> <p>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)</p> <p>Nesting birds – CoCP Part A (paragraphs 7.2.9, 7.2.16-7.2.21)</p> <p>Otter – CoCP Part A (paragraphs 7.2.40-7.2.45)</p> <p>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)</p> <p>Reptiles - CoCP Part A (paragraphs 7.2.9, 7.2.46-7.2.49) and CoCP Part B (paragraphs 3.1 and 3.3)</p> <p>Invasive species - CoCP Part A (paragraphs 7.2.58) CoCP Part B (paragraphs 3.1)</p> <p>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)</p> <p>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)</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>j. Landscape, Ecological and Recreational Management Plan [APP-099] does not cover the entire scheme (confined only on the new waste treatment plant) and therefore, does not cover the mitigation and management of all receptors.</p>	<p>j) <u>Landscape, Ecological and Recreational Management Plan [AS-066]</u></p> <p>The Applicant acknowledges that the LERMP (App Doc Ref 5.4.8.14) [AS-066] relates to the landscape masterplan as defined for the proposed WWTP and discussed with the stakeholders in the Technical Working Group, including in the County Council.</p> <p>Table 7-1 in ES Chapter 8 Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163] provides a summary of future monitoring mechanisms for the created and reinstated habitats as part of the Proposed Development. These are explained further in point h above.</p> <p>For areas of the Waterbeach Pipelines, Shafts 4 and 5 of the Waste Water Transfer Tunnel, the compound area at the Final Effluent Outfall, the construction of the Final Effluent and Storm Pipelines between the Final Effluent Outfall and Horningsea Road, the land will be reinstated in accordance with the requirements of the ES Volume 4 Chapter 2 Appendix 2.1 Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [APP-068] and ES Volume 4 Chapter 2 Appendix 2.2 Code of Construction Practice Part B (App Doc Ref 5.4.2.2) [AS-161], including the following.</p> <p>If any planting as part of the Proposed Development which dies or becomes seriously damaged or diseased within five years after completion of construction, it will be</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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.</p> <p>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</p> <p>In relation to habitats affected by the Final Effluent Outfall within Works Plan 32, the following measures will apply: The installation of the Final Effluent Outfall will minimise the extent of permanent loss of riverbank habitat and watercourse and riparian encroachment 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 and creation of reedbed to be 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 (App Doc Ref 5.4.2.1) [APP-068] will also apply.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>In relation to works to the ditch parallel to the river Cam that affect water vole habitat, the following measures will apply:</p> <p>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 Volume 4 Appendix 8.22 Water Vole Natural England Ghost Licence Method Statement (App Doc Ref) 5.4.8.22 [APP-107])</p> <p>Minimising the extent of the area required for the construction of the Final Effluent Outfall through altering the design so that the ditch profile could be reinstated upon completion of the works</p> <p>For areas outside of the landscape masterplan area, the mitigation and management activities will be secured as follows.</p> <p>Management and monitoring of the outfall area including the areas of Works Plan 32 and 39 as required by habitat compensation (ditches and reedbeds) in relation to the area of Works Plan 32, including long term management and monitoring is secured by Requirement 10 of the dDCO (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</p> <p>Management and monitoring of compensation habitat for water vole in accordance with the licence</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>k. No Construction Outfall Management Plan or Operational Outfall Management Plan have been submitted.</p> <p>It is not possible to determine if there will be adequate protection of biodiversity, or adequate mitigation / management for habitat loss associated with the outfall, water vole compensation, delivery of 20% Biodiversity Net Gain river units, monitoring programme for scour of River Cam (during storm events)</p> <p>l. Lighting Design Strategy [APP-072] does not completely remove adverse impact of lighting scheme from bats and</p>	<p>Monitoring of reinstated hedgerows, ditches and habitats as required by the CoCP Part A (App Doc Ref 5.4.2.1) [APP-068]</p> <p>Monitoring of reinstated land and soils as required by CoCP Part A (App Doc Ref 5.4.2.1) [APP-068]</p> <p>Schedule 2 requirement through a detailed monitoring plan prepared post consent as per commitment in Appendix C of the ES Chapter 8 Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163] for offsite river units</p> <p>The Applicant is satisfied that Requirements 7, 8, 9, 10, 11, & 22 of the dDCO (App Doc Ref 2.1) [AS-139]) will adequately secure mitigation and management of all receptors identified within the ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [AS-026].</p> <p>k) Construction Outfall Management Plan or Operational Outfall Management Plan</p> <p>An Outline OMMP has been prepared (App Doc Ref 5.4.8.24 [AS-073]). The Applicant will continue to engage with the County Council in relation to the use of the outfall management plan and these agreements will be recorded in the SoCG.</p> <p>The Applicant refers to the response to point j above in relation to securing mitigation for biodiversity.</p> <p>l) Lighting Design Strategy [APP-072]</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Low Fen Drove Way Grassland & Hedges CWS. The level of lighting spill associated with the operational phase is also unclear, as well as what additional mitigation measure will be implemented at the new Waste Water Treatment Plant (WWTP).</p>	<p>The response to point c above sets out the conclusion of the lighting impact assessment in relation to the CWS, identifies where in the Lighting Impact Assessment (App Doc Ref 5.4.15.3) [AS-100] is set out and how mitigation is secured.</p>
<p>Am CWS. V</p>	<p>4.4 The Council is concerned that the proposed draft DCO requirements do not effectively secure conservation of biodiversity, and seeks the following:</p> <ul style="list-style-type: none"> a. Requirement 9 - Construction Environmental Management Plan(s) wording should include a detailed Construction Ecological Management Plan b. Requirement 11 - Landscape, Ecological and Recreational Management Plan should cover the entire scheme, including monitoring wildlife sites, compensation for habitat loss and protected species (e.g. water vole / badger / bats). c. Requirement 10 - Outfall: wording of Requirement 10 should better reflect the Applicants commitment to deliver 20% BNG for River units. 	<p>The Applicant is satisfied that Requirements 7, 8, 9, 10, 11, & 22 of the dDCO (App Doc Ref 2.1) [AS-139] will adequately secure mitigation and management of all receptors identified within the ES Chapter 8 Biodiversity.</p> <ul style="list-style-type: none"> a. Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] 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. b. 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 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 Waste Water Transfer Tunnel, pipeline structures or the Final Effluent 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 Appendix 2.1 and 2.2 of the Code of Construction Practice Parts A and B (App Doc Ref 5.4.2.1 & 5.4.2.2) [APP-068 and AS-161]. <p>The Applicant acknowledges that ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>(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.</p> <p>For areas of the Waterbeach Pipelines, Shafts 4 and 5 of the Waste Water Transfer Tunnel, the compound area at the Final Effluent Outfall, the construction of the Final Effluent and Storm Pipelines between the Final Effluent Outfall and Horningsea Road, the land will be reinstated in accordance with the requirements of the ES Volume 4 Chapter 2 Appendix 2.1 Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [APP-068] and ES Volume 4 Chapter 2 Appendix 2.2 Code of Construction Practice Part B (App Doc Ref 5.4.2.2) [AS-161].</p> <p>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].</p> <p>c. The Applicant has amended Requirement 10(6)(e) of the dDCO (App Doc Ref 2.1 Revision 5) to ensure that 20% BNG in respect of river units is delivered. The requirement now reads:</p> <p><i>“(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-</i></p> <p>...</p> <p><i>(e) details of measures for the achievement of twenty percent biodiversity net gain comprising river units within or outside of the Order limits”</i></p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Some consequential amendments have been made to requirement 11(2).</p>
	<p>4.5 We support the Applicant's proposal to establish an Advisory Group prior to the landscape works commencing in order to advise on the detailed management and maintenance plan and review of the Landscape, Ecological and Recreation Management Plan. However, it is unclear how this will be delivered. The Council seeks an outline terms of reference document for the proposed group. Funding will also be required to be secured to support effective participation by key stakeholders, which should include representation from local groups.</p>	<p>The Applicant refers to paragraph 4.1.2 and 4.1.4 within section 4 of the LERMP (App Doc Ref 5.4.8.14) [AS-066] which confirms the intention to set up an Advisory Group and this requirement is secured by Schedule 2 of Requirement 11 of the dDCO (App Doc Ref 2.1) [AS-139] relating to the detailed landscape scheme and LERMP which will be approved by Natural England and the local planning authority. The group's terms of reference would form part of the detailed LERMP.</p> <p>The Applicant will continue to engage with relevant stakeholders, including, but not limited to, the County Council and Natural England, in relation to the development of the detailed LERMP, including the terms of reference for the Advisory Group.</p> <p>Requirement 11 of the dDCO (App Doc Ref 2.1) [AS-139] fulfils this requirement and requires that the detailed plan accords with the LERMP (App Doc Ref 5.4.8.14) [AS-066].</p>
<p>5 Carbon Environmental Statement - Volume 2 - Chapter 10 – Carbon [APP-042]</p>	<p>5.1 Cambridgeshire County Council declared a Climate Emergency in May 2019. The County's Climate Change and Environment Strategy 2022 recognises the opportunity to provide local leadership to tackling the climate crisis in Cambridgeshire. This new Strategy is our commitment to working for and with people,</p>	<p>5.1 The Applicant notes that the Strategy referred to was published after the Environmental Statement - Volume 2 - Chapter 10 – Carbon (App Doc Ref 5.2.10) [APP-042] was completed.</p> <p>5.2</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>communities, businesses. This should be considered under Local Policy.</p> <p>5.2 The carbon emissions for operation are presented for 30 years, which the Applicant states is based on the 30 year lifespan of the Landscape, Ecological and Recreational Management Plan [AAP-099]. It would be useful to clarify what will be likely to happen after 30 years being the site is expected to be retained indefinitely.</p> <p>5.3 Decommissioning impact should include waste disposal as well as vehicle movements. Construction emissions should also include construction waste disposal, which is not mentioned in Table 2-3.</p> <p>5.4 Operation phase emissions do not seem to have a baseline as part of Section 4.4 of Chapter 10 of the Environmental Statement. It would be useful to understand how the proposed operational emissions compare to those of the existing plant, which would probably be a more suitable baseline.</p> <p>5.5 It is important to note that the emissions referred to in 4.4.6 and 4.4.7 could change depending on the electricity grid decarbonisation profile. This issue is mentioned in 5.1.5 and 5.1.6. Year one emissions will therefore not be representative of every year of operation. Furthermore, it would be helpful to clarify if</p>	<p>The assessment considers the landscape masterplan lifespan of 30 years. Once this period has elapsed there may be a change in land use that could alter the carbon sequestration properties.</p> <p>5.3 The Applicant took a high-level approach to assessing decommissioning which included the key activities of transportation. This approach estimated decommissioning at ~0.03% of construction emissions (as stated in paragraph 4.5.6 of the ES Chapter 10: Carbon (App Doc Ref 5.2.10) [APP-042]). The Applicant confirms the vehicle movements used for the purpose of assessment are inclusive of estimated movements of waste in relation to decommissioning for the purpose of permit surrender.</p> <p>5.4 The assessment of operational phase emissions is explained in section 4.4 of the ES Chapter 10 (App Doc Ref 5.2.10) [APP-042]. Paragraph 4.4.1 sets out that the utilisation of biogas in CHP engines is the same approach taken for the operational emissions of the baseline. The Applicant confirms that the ES Chapter 10 (App Doc Ref 5.2.10) [APP-042] will be amended in this section to clarify this approach. An updated Chapter will be provided at Deadline 3.</p> <p>5.5 Section 4.4 of the ES Chapter 10 (App Doc Ref 5.2.10) [APP-042] relates only to Year 1 of operation (as stated in para</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>the net emissions 'per year' referred to in 4.4.7 and Figure 4.3 (and in Table 5-1) – is equal to the figure for year 1, or for an average year across the 30 years?</p> <p>5.6 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. Environmental Statement Chapter 10 appendix 10.1 GHG calculations [APP-109]</p> <p>5.7 We note some matters of detail would be helpful to clarify with the Applicant in relation to the tables before completing a review and commenting on this appendix.</p>	<p>4.4.1) and is based on electricity factors for the assumed opening year. The UK Government electricity grid projections show a decrease in grid emissions intensity, therefore year 1 would be expected to be the most carbon intensive and represent a worst case.</p> <p>The reference to 'Per year' in paragraph 4.4.7 of the ES Chapter 10 (App Doc Ref 5.2.10) [APP-042] is part of section 4.4 which relates only to year 1 of operation. The row for 'operation of the proposed WWTP' in Table 5.1 also relates to year 1. The Applicant confirms that The ES Chapter 10 (App Doc Ref 5.2.10) [APP-042] will be amended in para 4.4.7 and Table 5.1 to confirm this approach. This will be proved at Deadline 3.</p> <p>5.6 The Applicant notes the comments and will continue to discuss the issues and concerns raised with Natural England. Additional technologies could be feasible to utilise 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 could then either be bottled or used in vehicles to replace fossil fuels (Diesel) and create blue hydrogen, utilising solar as a power source and coupled with CO2 capture to produce a low emission fuel.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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.</p> <p>5.7 The Applicant welcomes further discussion in relation to details relating to the tables on Appendix 10.1 and will record outcomes of further engagement in the SoCG.</p>
6 Health	<p>6.1 We support the approach taken to assess the impacts on human health. The Environmental Statement - Volume 2 - Chapter 12- Health [APP-044] is comprehensive and has taken a sound methodological approach. Appropriate data sources have been used including the Cambridgeshire Joint Strategic Needs Assessment (JSNA) Core Data Set, however there are other JSNA's which could have been referenced, for example "Transport and Health JSNA", "New Housing and the Built Environment JSNA".</p> <p>6.2 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</p>	<p>The Applicant welcomes the comments in relation to the approach of the health impact assessment.</p> <p>6.1 The Applicant is aware of the Cambridgeshire Themed Reports (2013-2017) which include the JSNA documents relating to Transport, Health and a dozen other sub-topics. These documents provided interesting context on some of the issues relevant to the assessment, although were not used to the same extent as the JSNA Core Data Set and were therefore not included in the list of data sources.</p> <p>6.2 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, 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 delays are not</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>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.</p>	<p>5.2.18) assesses the operation of the vent. Para 4.3.73 indicates that the likely odour effect is expected to be, at worst, Negligible at the nearest receptor locations based on the frequency, intensity and duration of any effects, the source odour potential, pathway effectiveness, sensitivity of receptors and the function of embedded odour control features. The assessment considers that the risk of odour will be mitigated through use of a permanent vent stack inclusive of carbon filter. The residual impact is negligible and not significant.</p> <p>The Applicant confirms that the Waste Water Transfer Tunnel vent located at the interception shaft at the start of the Waste Water Transfer Tunnel within the site of the existing Cambridge WWTP will be a permanent vent stack. It will include 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 vent stack, inclusive of carbon filter and the height, is explicitly so to minimise odour release.</p> <p>The presence and purpose of the vent has been discussed with the County Council at Technical Working Group meetings.</p> <p>In relation to ES Volume 4 Chapter 18 Appendix 18.4 Preliminary Odour Management Plan (App Doc Ref 5.4.18.4) [AS-106], the Applicant refers to Requirement 20 (Odour management plan) of the dDCO (App Doc Ref 2.1) [AS-139],</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>6.4 The impact on the Gypsy and Traveller population has not been addressed within the Environmental Statement, Chapter 12, instead referring to the assessment on this population within the Equalities Impact Assessment (EQIA) [APP-211]. The EQIA, however appears not to have consulted with this group directly.</p> <p>6.5 The health impacts on construction workers, particularly access to healthy food, should be included as part of the Environmental Statement Chapter 12. It is likely that construction workers will source food from takeaway provision, probably from "burger vans" which long term is an unhealthy source of food.</p>	<p>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. The detailed odour management plan must be in accordance with the measures in the preliminary odour management plan and the principles and assessments set out in the relevant part of the environmental statement. The authorised development must be operated in accordance with the approved odour management plan. A preliminary Odour Management Plan is provided within the application (App Doc Ref 5.4.18.4) [AS-106].</p> <p>Through this approval process, the Applicant would agree with Cambridge City Council the necessary measures in relation to odour including the vent.</p> <p>6.4 As stated in Section 4.2, paragraph 4.2.6 of the Consultation Report submitted with the Application (App Doc Ref 6.1) [AS-116], a site visit to a seldom heard traveller group was made by members of the project team on 11 September 2020, with South Cambridgeshire District Councillor Hazel Smith to distribute community consultation leaflets and to answer questions about the Proposed Development.</p> <p>6.5 At this stage, the Applicant is not aware of the specific food provision that will be available to construction workers, as this is likely to be influenced by the approach taken by the</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>6.6 The Council would seek further clarity regarding the decommissioning process and responsibility for decontamination of the site prior to redevelopment. The Health Chapter references the Decommissioning Plan [AAP-070], but some of the potential Health Impacts are either not clear or have not been addressed. Clarity is needed on the decommissioning timelines, i.e., how long is the decommissioning process, at what point does it start, and how long are the gaps between each stage. There are concerns that once the site is decommissioned there may be a considerable gap until the site is redeveloped. Disused sites such as this may become targets for theft, vandalism and general antisocial behaviour, this can lead to increased community perceptions of lack of safety. The Equalities Impact Assessment (EQIA) [APP-211] concludes that there are no</p>	<p>specific contractor. As stated in section 5.3.3 the CoCP Part A (App Doc Ref 5.4.2.1) [APP-068], the Principal Contractor(s) appointed by the Applicant will be responsible for setting up construction compounds and maintaining these in a safe, clean and tidy condition. Welfare facilities including toilets, kitchen and dining facilities and drying rooms will be provided within the main construction compounds as required by the CDM Regulations.</p> <p>It is assumed that construction workers will be free to make their own choices regarding food and that mobile food outlets, as well as other sources of food, will be available. In other projects, healthy food advice has been provided as part of standard health, safety and wellbeing briefings, alongside other advice on healthy lifestyles. Therefore, it is not considered likely that the Proposed Development would influence lifestyle choices and a change to the baseline position to such an extent that significant health effects would be reported.</p> <p>6.6 The Applicant refers to the EPR 2012 (RG9) <i>The regulator must accept an application to surrender an environmental permit in whole or in part under regulation 25(2) if it is satisfied that the necessary measures have been taken – (c) to avoid a pollution risk resulting from the operation of the regulated facility; and (d) to return the site of the regulated facility to a satisfactory state, having regard to the state of the site before the facility was put into operation.</i></p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>equalities impacts, however the impacts on human health have not adequately been addressed.</p> <p>6.7 Sections 6.2-6.5, 6.7-9, and 6.11-6.13 of the Decommissioning Plan [AAP-070] refers to the process of emptying the “tanks” on site and “punching holes in them to prevent water build up. The Environmental Statement, Chapter 12, Health, has not assessed if there are any human health impacts of leaving these tanks in place with the potential for leachate from said holes.</p> <p>6.8 Section 6.15.4 of the Decommissioning Plan mentions the need for temporary odour control/scrubbers, the use of such controls has not been assessed within the Environmental Statement, Chapter 12, Health. In addition, the health impacts of the cleaning process e.g. through fugitive emissions and/or noise have not been assessed with the Health Chapter. In addition are there any human health impact during cleaning from (spray, odour etc.).</p>	<p>6.7 The piercing of the tanks would follow completion of decommissioning tasks, i.e. once residual materials have been removed and tanks cleaned. The piercing is to prevent rainwater filling the tanks over time and clean rainwater would drain to ground. Accordingly there is no pathway for contamination and therefore no associated health impacts to consider.</p> <p>6.8 The Applicant has reported odour effects for decommissioning in section 4.4 of ES Chapter 18 Odour (App Doc Ref 4.2.18) [APP-050]. This included assessment of draining and cleaning of waste water storage tanks and equipment, which was concluded to be, at worst, negligible (section 4.4.11) and with the mitigation measures in place, odour effects during decommissioning are anticipated to be similar to current conditions at the existing Cambridge WWTP and would not cause new odour effects at receptors.</p> <p>The Applicant has reported air quality effects for decommissioning in section 4.4 of ES Chapter 7 Air Quality (App Doc Ref 5.2.7) [APP-039]. The air quality assessment was completed on the basis that designed-in measures (indicated in Table 2-19), the Outline Decommissioning Plan (App Doc Ref: 5.4.2.3) [AS-051]and air quality management plan (AQMP) requirements are implemented during decommissioning activities and concluded that predicted</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>impacts and effects on air quality associated with construction vehicle movements and construction plant during the decommissioning of the existing Cambridge WWTP were found to be not significant.</p> <p>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 report any significant health effects during decommissioning.</p> <p>ES Appendix 2.3 Outline Decommissioning Plan (App Doc Ref 5.4.2.3) [AS-051] sets out the proposed decommissioning activities. No further health effects in relation to these decommissioning activities or associated odour and air quality effects have been identified.</p>
<p>Equalities Impact Assessment [AAP-211]</p>	<p>6.9 The Council broadly supports the findings of the Equalities Impact Assessment (EqIA), however there are concerns that the consultation has not reached some stakeholder groups. The Traveller community is not included in Appendix 7.12.2 of the EqIA that lists the stakeholder groups identified and contacted. The Health Chapter of the Environmental Statement specifically states that any health impacts to this group are considered with the EqIA. Without specific consultation</p>	<p>6.9 The Applicant refers to the Consultation Report (App Doc Ref 6.1) [AS-115] submitted with the Application where in Section 4.2, paragraph 4.2.6, it is stated that a site visit to a seldom heard traveller group was made by members of the project team on 11 September 2020 with South Cambridgeshire District Councillor Hazel Smith to distribute community consultation leaflets and be on hand to answer questions about the relocation project</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>with this group it is difficult to have assurance that the Health Impacts have been adequately addressed. This group have some of the poorest health outcomes and have a lower life expectancy when compared to the rest of the local population.</p> <p>6.10 Appendix 7.12.2 of the EqIA (Stakeholders relevant to the EqIA identified and contacted) lists the stakeholders consulted, there are concerns that a significant number of stakeholders did not respond, whilst individual responses are not within the gift of the applicant the EqIA has not given sufficient detail on the attempts made to gather views or if any other data/similar consultations could have been used as proxy measure to ensure relevant views were taken into account in preparation of the EqIA.</p> <p>Appendix 12.1: Health Screening Document [AAP-111] 6.11 The Council welcomes a high level introduction to health within the context of an EIA as well as the consideration given to key documents such as South Cambridgeshire Supplementary Planning Guidance for HIAs and the Public Health England Health Impact Assessment in spatial planning 2021. The Council further welcomes the inclusion of the wider determinants of health as the full scope of health considerations within the HIA.</p>	<p>6.10 The Applicant contacted 21 organisations to invite them to an engagement telephone interview. Contact was made via email, where no response was received a follow up email and phone call were made to the organisations. Broader consultation material was considered, however the EqIA only reports on issues relating to equality and protected characteristic groups, of which there was nothing specifically raised in the consultation.</p> <p>The Applicant contacted 21 organisations to invite them to an engagement telephone interview. Contact was made via email, where no response was received a follow up email and phone call were made to the organisations. Broader consultation material was considered, however the EqIA only reports on issues relating to equality and protected characteristic groups, of which there was nothing specifically raised in the consultation.</p> <p>Similar consultations cannot be used as a proxy measure as engagement and potential issues are project specific and therefore using a proxy would not accurately depict the experiences of equality groups.</p> <p>6.11 The Applicant welcomes the support to the approach taken for the Health Screening Document.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Health Evidence Review 12.2 [AAP-112] 6.12 The Council supports the review and has identified links between the environmental, social and economic health determinants and their health outcomes. Appendix 12.3: Mental Wellbeing Impact Assessment (MWIA) [AAP-113]</p> <p>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.</p>	<p>6.12 The Applicant welcomes the support to the approach taken for the Health Evidence Review.</p> <p>6.13 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 recommend further Mental Wellbeing Impact Assessments. Comments or recommendations are set out in section 4 of ES Appendix 12.3 Mental Wellbeing Impact Assessment (MWIA) (App Doc Ref 5.4.12.3) [AS-077].</p>
7 Historic Environment	<p>7.1 The Council welcomes the approach to the mitigation of construction impacts on undesignated heritage assets of archaeological interest and the stated intention of agreeing the programme of work with the County Council's Historic Environment Team. Further work to define the scope of the archaeological investigation, the research objectives and outcomes of the programme of work will be necessary to ensure that this approach is appropriately targeted and effective.</p>	<p>The Applicant welcomes the support on the approach to mitigation to undesignated assets. The Applicant confirms the intention to prepare an Archaeological Investigation and Mitigation Strategy which will be developed in consultation with County Council's Historic Environment Team.</p>
8 Land Quality	<p>8.1 Policy 5 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) identifies a number of mineral safeguarding areas on its associated Policies Map.</p>	<p>The Applicant confirms its intention to utilise all excavated material not required for reinstatement within the landscape masterplan. The majority of this material will be derived from the excavation of the Transfer tunnel.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Mineral Safeguarding Areas identify areas of mineral deposits, and Policy 5 seeks to promote prior extraction where possible. During the course of the Examination the Council will be seeking to ensure that best use is made of any sand and gravel incidentally extracted as part of the development.</p>	<p>The Applicant refers to measures relating to the reuse of materials within the Proposed Development as set out within CoCP Part A (App Doc Ref 5.4.2.1) [APP-068], Section 7.9 (Waste management and resource use, Waste minimisation) which requires the implementation of an approved Materials Management Plan.</p> <p>Further 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).</p>
<p>9 Landscape and Visual Amenity</p>	<p>9.1 The Proposed Development will have a significant adverse impact on the landscape both visually (from both the new structures and lighting proposed), but also as a result of the traffic generated by the Development during operation along its new access road. The Byway Open to all traffic (No. 130/17 Horningsea) runs immediately to the north and east of the Proposed Development. It is relatively lightly used, but is appreciated for its wide open views of the surrounding countryside, particularly towards the fens to the east and south-east. The Council welcomes the proposed new dedicated Public Bridleway linking Low Fen Drove with Station Road, Stow-cum-Quy, and recognises that this may provide some reasonable degree of compensation for users of the public rights of way (PROW) network and local communities.</p> <p>The Councils would prefer that this path was a Restricted Byway, as this would enable use by carriage drivers who</p>	<p>The Applicant welcomes support for the change in status of a section of existing track as a Bridleway.</p> <p>There is no linkage between the proposed WWTP and the requested change of status of the Public Byway. The Applicant understands 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 dDCO. However, the section 106 agreement proposed with South Cambridgeshire District Council provides for monitoring of ASB and the ability for the County 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 ExQ1.1.5) [AS-127].</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>have few facilities available in the area, and it would also confer equal rights for cyclists as for other non-motorised users (NMUs). However, details to ensure the delivery of a dedicated PROW is needed to avoid concerns being raised during the Examination. It will also help meet certain policy requirements of the Cambridgeshire Rights of Way Improvement Plan (ROWIP), National Planning Policy Framework (NPPF) paragraph 100, the Defra 25 Year Environment Plan, and the Cambridgeshire & Peterborough Joint Health and Wellbeing Integrated Care Strategy.</p> <p>9.2 Noting the above, the Council consider that more could be done to offset the adverse impact on local communities, including provision for all NMUs being inclusive of equestrians along the B1047 over the A14 bridge into Fen Ditton, meeting the new Bridleways being delivered as part of the Marleigh housing development; Section 106 (s106) legal agreement monies for protection and enhancement of the existing PROW network in the vicinity of the proposed development; heritage interpretation boards; and a Community Fund to help support local community initiatives. The Councils would welcome early engagement with the Applicant to resolve these concerns by the close of the Examination.</p>	<p>The Applicant notes the comments and will continue to engage with the local planning authority on this point. The outcome of this engagement will be recorded in the SoCG.</p>
10 Material Resources and Waste	10.1 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	The Applicant confirms its intention to utilise all excavated material not required for reinstatement within the landscape

Reference	Relevant Representation Comment	Applicant's Response
	<p>around the proposed Water Recycling Centre. During the Examination the Council will be seeking to ensure that only material from the development is used in the landscaping and that inert material from other developments will not be required. If this were to occur it would change the policy context, and Policy 26 Other Developments Requiring Importation of Materials would be relevant. The Council wishes to ensure that the importation of inert material will not be required.</p>	<p>masterplan. The majority of this material will be derived from the excavation of the Waste Water Transfer Tunnel.</p> <p>The Applicant refers to paragraph 4.2.9 of ES Chapter 16: Material Resources and Waste (App Doc Ref 5.2.16) [APP-048] which 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 m³ 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.</p> <p>Table 2-5 of ES Appendix 16.1 Material Resource Requirements and Waste Estimates (App Doc Ref 5.4.16.1) [APP-132] states that ' <i>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</i>'. The design of the Proposed Development will endeavour to ensure a cut fill balance is achieved and the Proposed Development does not require the importation of material.</p> <p>Reuse of some of the non-hazardous excavated materials such as large rocks, non-plastic redundant pipe material etc., identified for disposal (26,241m³) in Table 2-7 of ES Appendix 16.1 Material Resource Requirements and Waste Estimates (App Doc Ref 5.4.16.1) [APP-132], as excavated material other than topsoil, rock or artificial hard material and refers to</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>litter/rubbish, large rocks, redundant pipework, land drain debris etc. will also be explored. If the final design requires the import of small volumes of inert material, then a consultation will be undertaken with Cambridge County Council to identify and agree the approach to mitigate potential effects from the importation of material.</p> <p>The Applicant also refers to measures relating to the reuse of materials within the Proposed Development as set out within CoCP Part A (App Doc Ref 5.4.2.1) [APP-068], Section 7.9 (Waste management and resource use, Waste minimisation) which requires the implementation of an approved Materials Management Plan.</p>
11 Noise and Vibration	<p>11.1 The Council is generally satisfied that the noise and vibration assessment is robust and has used appropriate methodology, however there are concerns that the noise for the emergency generators has been scoped out.</p> <p>11.2 There are also concerns that some assessments can't be adequately concluded as some of the fixed plant locations e.g. the pumping station have yet to be determined and confirmed. Further assessments will be needed to assure there are no impacts on human health from noise and vibration when the locations have been confirmed.</p>	<p>11.1 The Applicant welcomes support of the approach to the assessment of noise and vibration. 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.</p> <p>In relation to the scoping out of potential impacts from emergency generators, the Applicant notes this is because 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</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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.</p> <p>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.</p> <p>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 each event. The flare stack would be used for required periods to enable safe operation of the proposed WWTP. 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.</p> <p>11.2 The Applicant notes the comments in relation to the pumping station, however this aspect is not part of the Application. Section 2.8.4 of ES Chapter 2: Project Description (App Doc</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Ref 5.2.2) [APP-034] describes that the new pumping station at Waterbeach does not form part of the consent sought by the Application and is, therefore, outside the scope of the Proposed Development and the operational noise impact assessment.</p> <p>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.</p> <p>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.</p>
12 Odour	12.1 The proposed 10m (above ground level) permanent ventilation stack to the interception shaft, at the start of the wastewater transfer tunnel within the existing Cambridge WWTP, requires further consideration having regard to a future residential use of the site. From a planning perspective, notwithstanding the potential application of the NPPF's Agent of Change Principle at any such point, planned odour controls should, from the outset, be such as to robustly protect residential amenity	The Applicant confirms the Waste Water Transfer 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 vent stack, inclusive of carbon filter and the height is explicitly so to minimise odour release.

Reference	Relevant Representation Comment	Applicant's Response
	<p>throughout the use of the infrastructure's operations. Paragraph 5.1.5 of the Preliminary Odour Management Plan [AAP-140] mentions controls 'expected' to be included. More certainty as to the necessary mitigations needed are sought. Further, the potential application/weight of Policy 18: Amenity Considerations, of the Cambridgeshire and Peterborough Minerals and Waste local Plan must be accounted for. The policy refers to how development proposals can be integrated effectively with existing or planned neighbouring development.</p>	<p>The presence and purpose of the vent has been discussed with the County Council within Technical Working Group meetings.</p> <p>In relation to the preliminary odour plan, the Applicant refers to Requirement 20 (Odour management plan) of the dDCO (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. The detailed odour management plan must be in accordance with the measures in the preliminary odour management plan and the principles and assessments set out in the relevant part of the environmental statement. The authorised development must be operated in accordance with the approved odour management plan.</p> <p>Through this approval process, the Applicant would agree the necessary measures with Cambridge City Council in relation to odour, including the vent.</p> <p>The Applicant also refers to Requirement 7 of the dDCO (App Doc Ref 2.1) [AS-139] which requires details to be submitted for approval to the local planning authority are in accordance with the design objectives set out within the Design and Access Statement (App Doc Ref 7.6) [AS-168] which includes <i>Objective 3.2 Minimise impact of odour, through layout of the plant and specification of equipment.</i></p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The Applicant therefore considers that Requirements 7 and 20 of the dDCO (App Doc Ref 2.1) [AS-139] and the approval of the detailed design and detailed management plan sufficiently addresses this comment.</p>
<p>13 Traffic and Transport DCO Order [APP-009]</p>	<p>13.1 The Highway Authority seeks that all works within the adopted public highway be agreed with the developer using Section 278 (S278) of the Highways Act 1980. This will require the developer to enter into appropriate S278 Agreements, with either a bond or cash deposit, pay the Highway Authority's inspection fees and any legal fees resulting from the works. Such measure will provide a suitable level of protection for the Highway Authority (and ultimately the citizens of Cambridgeshire) in the event of any difficulties being encountered in the future. This requirement will necessitate the DOC to be amended.</p> <p>13.2 The Highway Authority already has two forms of S278 Agreement:</p> <p>I. The Formal Agreement. This is used when any land needs to be dedicated as adopted public highway (using Section 38 of the Highways Act 1980), when a formal Road Safety Audit is required and when the estimated value of the works is above £50,000.</p> <p>II. The Short Form Agreement. This is used for minor works under the value of £50,000. Given the current rate of inflation and nature of the works the Highway Authority would be content to see this figure increased to £100,000.</p>	<p>The Applicant recognises the need for clarity on how consenting powers that would normally reside with Cambridgeshire County Council, would be applied through the DCO (if and when made) without adversely affecting the County Council's wider role to respond to applications by other parties for similar consents on the same receptors.</p> <p>The Applicant also recognises the need to review with the County Council all the Traffic and Transport issues raised in points 13.1 to 13.65 with the respective traffic officers and technical specialists. The Applicant has sought to address this in a further Traffic and Access meeting. As at Deadline 1, a meeting date is still to be confirmed but the Applicant acknowledges the County Council's limited time and resources to discuss each item in detail. The Applicant proposes to hold this meeting between Deadline 1 and Deadline 2 and provide detailed response on these matter s within the SoCG with the Council.</p> <p>In response to the specific points raised at 13.1 to 13.8 regarding the use of a Section 278 agreement, this was discussed at ISH1. The Applicant refers to the section of the Post Hearing Submission (p18) dealing with Part 6 of the dDCO and, since the hearing, has converted the County</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>13.3 The Highway Authority already has precedent forms of both agreements and if their structure could be agreed as part of the DOC, this will significantly increase the speed at which the agreements can be issued and reduce the need for legal input from both sides.</p> <p>13.4 Road Safety Audits (RSA): GG119 of the Design Manual for Roads and Bridges States: 5.46.1 A stage 1 RSA report should be undertaken before planning consent is applied for as this demonstrates that the potential for road user safety issues has been addressed. The RSA Stage 1 for the main signalised access to the waste water treatment plant has been completed (25th November 2022), though no Designers Response has been provided so the process is incomplete. Protective Provisions</p> <p>13.5 The Protective Provisions for the highway authority are generally comprehensive.</p> <p>However, the County Council has the following concerns: 13.6 There is no mention of compensation to the Local Highway Authority (LHA) for possible damage to the highway network as a result of extraordinary levels of traffic – this could be particularly relevant during construction phases.</p>	<p>Council's Section 278 agreement wording into protective provisions for review by the County Council.</p> <p>The Applicant has responded to points 13.9 to 13.18 as part of its response to ExQ1.10.6.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>13.7 The timescales presented are not sufficient. The timeline for certification and provisional certification is set at 14 days, but this is not realistic as it would need to include a site inspection. The County Council requests 21 days.</p> <p>13.8 The protective provisions do not appear to encompass any works that affect PROW. However, PROW are public highways governed by the same traffic management procedures. The Council would request that this provision is amended to explicitly refer also to PROW.</p>	
<p>Street Works (Article 10 and Schedule 3)</p>	<p>13.9 The schedule should clearly state which streets are public highways and which are not.</p> <p>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.</p> <p>13.11 It would be helpful for this article to explicitly linked to the protective provisions.</p>	<p>13.9 The statutory definition of 'street' in s48(1) of the New Roads and Street Work Act 1991 includes adopted and unadopted highway.</p> <p>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, nor is it standard practice for DCO drafting.</p> <p>13.10 The Applicant notes there is no reference to a permit in the New Roads and Street Works Act 1991 and assume this is a general reference to notices and authorisations under that Act.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>However, all street works remain subject to the provisions of ss54-106 of the 1991 Act, including any related requirements to give notice.</p> <p>The Applicant refers to Article 10(3) of the dDCO (App Doc Ref 2.1) [AS-139] which states the following.</p> <p><i>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).</i></p> <p>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 of the dDCO (App Doc Ref 2.1) [AS-139].</p> <p>13.11 The Applicant does not agree as there many powers in the dDCO (App Doc Ref 2.1) [AS-139] which are regulated by protective provisions and the Applicant does not consider it necessary to make a specific reference in this particular instance.</p>
Alterations to streets	13.12 The schedule should clearly state which streets are public highways and which are not.	<p>13.12 The Applicant reiterates its response above regarding Article 10, which is relevant here.</p>

Reference	Relevant Representation Comment	Applicant's Response
(Article 11 and Schedule 4)	13.13 It would be helpful for this article to make direct reference to the protective provisions.	<p>13.13 The Applicant reiterates its response above regarding Article 10, which is relevant here.</p>
PROW (Article 13)	<p>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).</p> <p>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.</p> <p>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.</p>	<p>13.14 The detail of the closures sought by the Applicant is already contained in the dDCO Schedule (App Doc Ref 2.1) [AS-139] and so it is not 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) of the dDCO) (App Doc Ref 2.1) [AS-139].</p> <p>13.15 The Applicant notes the dDCO (App Doc Ref 2.1) [AS-139] already requires approval of temporary closures where the Applicant and the County Council need to agree a diverted route if 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. The Applicant is, however, happy to notify the County Council of closures prior to them occurring and has made this amendment in the dDCO at Article 13(5) as follows:</p> <p><i>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.</i></p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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).</p> <p>13.16 The Applicant notes the comment and will discuss the need for protective provisions for the new PROW and record the outcome in the SoCG.</p>
<p>Accesses (Article 14)</p>	<p>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.</p>	<p>13.17 The Applicant is content with this suggestion and has amended Article 14 to provide that any works to create a permanent access which joins a highway maintainable at the public expense must be carried out in accordance with the 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.</p> <p>The change is also noted in Document 2.4 DCO Changes Tracker (Rev 3) (Clean) and 2.4 DCO Changes Tracker (Rev 3) (Tracked).</p>
<p>Maintenance (Article 15)</p>	<p>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.</p>	<p>13.18 This is dealt with in Article 15 and the protective provisions as follows.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p><i>15.—(1) The highway works must be completed in accordance with the provisions of Parts 5 and 6 of Schedule 15 (protective provisions).</i></p> <ol style="list-style-type: none"> <i>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.</i> <i>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.</i> <p>The protective provisions then state:</p> <p><i>Defects period</i> <i>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.</i></p> <p><i>(2) Following the issue of the provisional certificate the local highway authority has responsibility for maintenance of the highway.</i></p> <p><i>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</i></p> <p><i>Final Certificate</i></p>

Reference	Relevant Representation Comment	Applicant's Response
		<p><i>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.</i></p> <p><i>“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;</i></p> <p><i>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.</i></p> <p><i>However, as discussed at Issue Specific Hearing 1 and confirmed above, the Applicant has reviewed the County Council’s s278 wording and has redrafted this in the format of protective provisions. Any necessary amendments to this Article 15 will also be included once those provisions have been agreed.</i></p>
<p>Works Plans [APP-017]</p>	<p>13.19 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9001 Rev C02: i. This drawing is acceptable to the Highway Authority.</p> <p>13.20 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9002 Rev C02: i. the ‘highway works’ elements should be separated out to clearly identify those areas under the control of the National Highway Authority and those under the control of the Local Highway Authority as these bodies may have differing requirements within the context of the DOC.</p> <p>13.21 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9003 Rev C02: i. Discussions must be held with the Greater Cambridge Partnership to ensure that their proposed Waterbeach</p>	<p>The Applicant notes the comments on the Work Plans and will engage with the LPA on each point and record the outcome in the SoCG.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Greenway Project and the proposed Highway Works dovetail.</p> <p>ii. Note 2.i applies.</p> <p>13.22 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9007 Rev C02:</p> <p>i. The use of the existing access at Gayton Farm will require some works within the existing adopted public highway and this area should be shown shaded tan.</p> <p>13.23 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9008 Rev C02:</p> <p>i. The works to the existing adopted public highway at Grange Farm and S37 need to be separately identified and not conflated with off highway temporary works.</p> <p>13.24 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9009 Rev C02:</p> <p>i. The works to the existing adopted public highway at Burgess Farm and Riverside Farm need to be separately identified and not conflated with off highway temporary works.</p> <p>13.25 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9010 Rev C02:</p> <p>i. The works to the existing adopted public highway at Bannold Road, Burgess Drove and Long Drove need to be separately identified and not conflated with off highway temporary works.</p>	
<p>General Arrangement Plans [APP-016]</p>	<p>13.26 10. Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9031 Rev C01:</p> <p>i. Confirmation of any works to the existing Waste Water Treatment Plan access is requested.</p>	<p>The Applicants notes the comments and will discuss with CCC. The outcome of the discussions will be recorded in the SoCG.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>13.27 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9033 Rev C01: i Any proposed works to alter the alinement of the adopted public highway over the A14 Bridge need to be specifically identified on this plan</p> <p>13.28 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9037 Rev C01: i. No works are shown at Gayton Farm, even if these are only shown indicatively it must be recognised that such works are likely to be needed.</p> <p>13.29 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9038 Rev C01: i. The works to the existing adopted public highway at Grange Farm and S37 need to be shown. At present the General Arrangement Drawing is showing no additional works.</p> <p>13.30 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9039 Rev C01: i. The works to the existing adopted public highway at Burgess Farm and Riverside Farm need to shown. At present the General Arrangement Drawing is showing no additional works.</p> <p>13.31 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9023 Rev C01: i. The works to the existing adopted public highway at Bannold Road, Burgess Drove and Long Drove need to shown. At present the General Arrangement Drawing is showing no additional works.</p>	

Reference	Relevant Representation Comment	Applicant's Response
<p>Design Plans – Highways and Site Access [APP-025]</p>	<p>13.32 The plans should show more clearly that the access road to the site will not be a highway maintainable at public expense.</p> <p>13.33 It is also important the Applicant uses the County Council's Highway Boundary data to ensure proposals can be delivered within the Local Highway boundary. This is available to the Applicant upon request. It is also important to distinguish between Local Highway from land owned by National Highways in the plans.</p> <p>13.34 The Council objects to the proposed pedestrian and cycle facility currently proposed for the B1047 Horningsea Road. In meetings with the Applicant in 2022 the Council explained that this non-motorised user (NMU) facility should be inclusive of all NMUs including equestrians. Every effort should be made to accommodate for all NMU unless it can be demonstrated it is undeliverable. The Council also pointed out that it would be better for NMUs using the PROW network access via Low Fen Drove if this facility was on the eastern side of the B road, to avoid the need to cross this busy road. As noted under Landscape and Visual (Paragraph 9.2 above), this NMU facility offers an excellent opportunity to provide an important missing link in the bridleway network, helping to meet statutory ROWIP policy SoA2. It is therefore disappointing to see that no change has been made. The Councils requests early engagement with the Applicant to resolve this matter.</p>	<p>The Applicants notes all of the comments in relation to Design Plans – Highways and Site Access and will discuss these with the County Council. The outcome of the discussions will be recorded in the SoCG.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>13.35 Further detailed design of the access and improvements on Horningsea Rd. are needed including the locating and management of street furniture, including lighting. The narrowing of the verge on the eastern side of the A14 bridge is a concern as there is already experience of vehicles hitting poles and heads on this section. The narrowing also impacts the ability to maintain the signals without a full set of temporary signals and a lane closure.</p> <p>13.36 Swept paths for HGVs are needing to be shown on the access plans to ensure street furniture is not vulnerable to being struck. Current street furniture is prone to poles being damaged by large vehicles making turns.</p> <p>13.37 Overhead traffic signal detection should be the very first consideration in the detailed design. Inductive loops will only be considered where no other option is available.</p> <p>13.38 The proposals as part of the application need to be aligned with that of the Horningsea Greenways scheme that is to deliver further improvements along Horningsea Road.</p> <p>13.39 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9808 Rev C01:</p>	

Reference	Relevant Representation Comment	Applicant's Response
	<p>i. This drawing is acceptable in principle subject to detailed design and that raise above relating to provision for equestrian users.</p> <p>13.40 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9809 Rev C01: i. The proposals within the existing adopted public highway are acceptable subject to detailed design. The Highway Authority will not adopt swales as a drainage solution.</p> <p>13.41 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9810 Rev C01:</p> <p>i. The facility to the widened section of the bridge for non-motorised users will not solely be a cycleway and the term shared use, should be annotated. There were discussions re the use of this route by equestrians and these should be referred even if they proved to be impractical.</p> <p>ii. It is doubtful that the proposed grass verge along the widened bridge section will establish or be successful, so an appropriate hard paved solution may be required.</p> <p>13.42 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9811 Rev C01 and Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9812 Rev C01:</p> <p>i. These works are wholly off the existing or proposed adopted public highway.</p>	

Reference	Relevant Representation Comment	Applicant's Response
	13.43 Dwg. No. 0001-1000006-CAMEST-ZZZ-LAY-Z-9813 Rev C01: i. The proposals are acceptable subject to detailed design.	
Construction Traffic Management Plan (ES Vol. 4, Chapter 19, Appendix 19.7) [App-148]	<p>13.44 From the Highway Authority perspective, the function of the Construction Traffic Management Plan (CTMP) is to control, and where possible mitigate the impact and interaction of construction traffic on the users of the adopted public highway. Furthermore, the impact on the fabric of the highway itself. The document needs to be more focused on these outcomes.</p> <p>13.45 Paragraph 6.3.3 states "These weight limits are Traffic Regulation Orders (TRO) and are therefore enforceable by Cambridgeshire County Council as the Local Highways Authority." The police authority enforces weight restrictions not the Local Highways Authority.</p> <p>13.46 Installation of Automatic Number Plate Recognition (ANPR) cameras will be subject to the approval of Cambridgeshire County Council and will require the relevant licences being applied for by the applicant and approved by the County Council. ANPR equipment must meet current standards and data collected by the cameras must be managed / stored to ensure GDPR is complied with.</p> <p>13.47 Installation and locations of any signage must be approved by the County Council.</p>	<p>The Applicant notes the comment and refers to Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] that requires a Construction Traffic Management Plan, for each phase of the development, to be submitted and approved by the local planning authority alongside the Construction Environmental Management Plan for that phase.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>13.48 Paragraphs 6.4 and 6.5. The proposed timeframes for deliveries etc. must be made explicit within the document. Given the traffic sensitive nature of the streets in question the Local Highway Authority seeks that demolition or construction vehicles with a gross weight in excess of 3.5 tonnes shall service the site only between the hours of 09.30hrs - 16.00hrs, seven days a week.</p> <p>13.49 Paragraph 7.3.3 The applicant should provide details of suggested enforcement procedures (how many breaches before a company is removed from the works for instance). Having a more transparent procedure will give more confidence to the public that these matters will be effectively enforced.</p>	
<p>Appendix 2.1 Code of Construction Practice Part A [APP-068]</p>	<p>13.50 Paragraphs 7.6.13 – 7.6.18 provides details of measures to be put in place to manage the impact upon users of the PRow during the construction period. Temporary closures should be a last resort and must be agreed with the LHA. Any alternative routes must be agreed with LHA Rights of Way Officer. Signage at appropriate decision points for public to be agreed with LHA.</p> <p>13.51 The programme for works should be shared with LHA Rights of Way Officer.</p> <p>13.52 Parish councils and local and statutory user groups as well as LHA should be included as part of the</p>	<p>The Applicant notes the comment and refers to Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] that requires a Construction Traffic Management Plan, for each phase of the development, to be submitted and approved by the local planning authority alongside the Construction Environmental Management Plan for that phase.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>communication to local residents and businesses mentioned in paragraph 7.6.17.</p> <p>13.53 Paragraph 7.6.18 describes PRowS will be restored to the same condition as before the works took place or to a standard which is acceptable to the Local Highway Authority. Restoration to full legal width of the PRow is required. Condition surveys should be taken before works commence and should include boundary features as well as the surface. Provision should be provided for the LHA to make inspections.</p>	
<p>Appendix 19.3: Transport Assessment</p>	<p>13.54 The Council would encourage the Applicant to review opportunities that would minimise the need for construction traffic through Waterbeach. This could include using or sharing routes with other nearby developments. It is also important to co-ordinate with other developments in the area such as the relocated Waterbeach railway station.</p> <p>13.55 The Council also encourages the Applicant to review opportunities to minimise the construction traffic through Chesterton and using Fen Road level crossing which is known to be down for a high proportion of time.</p> <p>13.56 The Council is broadly satisfied that the construction access routes are acceptable in terms of highway capacity. It is essential to ensure unnecessary movements are avoided through residential areas.</p>	<p>13.54 & 13.55</p> <p>The Applicant notes the comment and refers to Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] that requires a Construction Traffic Management Plan, for each phase of the development, to be submitted and approved by the local planning authority alongside the Construction Environmental Management Plan for that phase.</p> <p>The Applicant refers to its intention to create a Construction Forum as described within paragraph 3.1.10 of ES Chapter 19 Appendix 19.7 Construction Traffic Management Plan (App Doc Ref 5.4.19.7) [AS-109], which covers the commitment to coordinate with parties related to Waterbeach New Town (and others) in relation to traffic management.</p> <p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] secures the provision of a detailed CTMP for each phase of</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>13.57 It is agreed that the only construction access point that needs modelling is the site access. However, it is noted that other access routes and junctions have been modelled. The Council will need to review the details of the modelling of these junctions and the highway layout and design of these works.</p> <p>13.58 Traffic generation, this will have a negative impact on the network due to the additional traffic. However, the applicant has put forward a package of mitigation that includes the signalisation of the main access junction. Please note comments above in relation to further enhancements to the current proposals for non-motorised users on Horningsea Road.</p> <p>13.59 The 50 cycle parking spaces seem appropriate for the potential 92 full time employees on the site at any time. Further detail will be needed on the location and layout of the cycle parking.</p> <p>13.60 The Council will need to review whether there is a need for bus stops to be relocated on Horningsea Road to the pedestrians and cyclists site access.</p> <p>13.61 The secondary mitigation details (Paragraph 2.7.23 and Table 2.8) are appropriate and relate to Travel Plans and construction good practice. CCC will need to review</p>	<p>the development, to be submitted and approved alongside the CEMP for such phase. Through this approval process, the Applicant would agree with the local planning authority approaches to traffic management including coordination with other parties. The Applicant therefore considers that Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] sufficiently addresses this comment.</p> <p>13.56 The Applicant welcomes broad agreement with the construction access routes set out for the Proposed Development. The Applicant refers to the point above in relation to the development of the detailed CTMP.</p> <p>13.57 The Applicant notes the County Council's view that the site access requires modelling and confirms that there will be continued coordination in relation to the development of the highway layout and design of these works. The Applicant confirms outcomes of modelling is reported in the Transport Assessment (App Doc Ref 5.4.19.3) [AS-108A-B].</p> <p>13.58 The Applicant welcomes the acknowledgement that the package of mitigation measures in relation to minimising impacts on the network.</p> <p>13.59</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>the details within these to ensure that they represent the best opportunity to reduce single occupancy travel by the workforce.</p> <p>13.62 The network of traffic surveys (see Paragraph 4.2.36) undertaken had been agreed at the pre app stage with the applicant.</p> <p>13.63 The collision analysis (see paragraph 4.2.40) covers the agreed area during the pre application stage and the findings detailed are agreed. The only cluster of collisions in the Waterbeach area is noted to be at the junction of the A10 with Denny End Road. The layout of this junction has recently been improved which may reduce the number of collisions in the future. These works were completed as part of Waterbeach New Town.</p> <p>13.64 It is noted that modelling has been undertaken for the Milton interchange and this will be reviewed and CCC to comment accordingly during the Examination. The construction traffic volume is not expected to cause a network issue but this will be assessed by CCC. This is because construction traffic movements are to be restricted during peak times, when the highway network is at its busiest. The modelling scenarios have been agreed with CCC at the pre application stage. CCC will undertake a detailed review for each of the junctions modelled, of the modelling scenarios, assumptions outputs and model details and will respond accordingly.</p>	<p>The Applicant confirms that the development of the allocation for cycle parking has been undertaken in consultation with the County Council. Under the dDCO Requirement 7, Detailed design (App Doc Ref 2.1) [AS-139], the Applicant will submit detailed design for approval by the LPA, these details will include the location and layout of the cycle parking.</p> <p>13.60 The Applicant notes the comment in relation to bus stops and confirms it will continue to engage with the local highways team at the County Council and that arrangements in relation to bus stops will be recorded within the SOCG.</p> <p>13.61 The Applicant welcomes the comments in relation to the Travel Plan. The Applicant refers to the Construction Workers Travel Plan (App Doc Ref 5.4.19.9) [APP-150] Operational Workers Travel Plan (App Doc Ref 5.4.19.8) [APP-149] which sets out measures to be incorporated in to detailed plans. Under Requirement 12 of the dDCO (App Doc Ref 2.1) [AS-139] a detailed operational workers' travel plan must be submitted to and approved in writing by the relevant planning authority. The detailed operational workers' travel plan must accord with the measures set out in the operational workers' travel plan (ES Volume 4 Chapter 19 Appendix 19.8 Operational Workers Travel Plan (App Doc Ref 5.4.19) [APP-149].</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>13.65 The flows from construction and operation were set out at the pre application stage. The impact of the flows on the network will need to be checked, including the modelling for the main access junction, and the other junctions modelled.</p>	<p>Similarly, regarding Requirement 9 (Construction plan) of the dDCO (App Doc Ref 2.1) [AS-139], the Applicant refers to the requirement for a detailed construction workers' travel plan to be appended to the construction environment management plan for each phase. The detailed construction workers' travel plan must accord with the measures set out in the (ES Volume 4 Chapter 19 Appendix 19.8 Operational Workers Travel Plan (App Doc Ref 5.4.19) [APP-149] and must be submitted to, and approved in writing by, the relevant planning authority.</p> <p>Through this approval process, the Applicant will agree the details with the local planning authority for each plan and the Applicant, therefore, considers that Requirements 9 and 12 of the dDCO (App Doc Ref 2.1) [AS-139] the approval mechanism of the management plans sufficiently addresses this comment.</p> <p>13.62 – 13.63 The Applicant acknowledges confirmation that assessments and the use of data have been as agreed in discussion with the County Council.</p> <p>13.64 – 13. 65 The Applicant understands that the County Council's local highways team will further scrutinise modelling work underpinning the transport assessment (App Doc Ref 5.4.19.3) [AS-108A-B] including assumptions, outputs and model details, and the impacts on network flows. The Applicant</p>

Reference	Relevant Representation Comment	Applicant's Response
		confirms it continues to engage with the team through the process of finalising the SoCG.
14 Water Resources	<p>14.1 Paragraph 3.4.3 of the Flood Risk Assessment [APP-151] indicates that any drainage exceedance event would be contained within the boundary of the site, which is acceptable in principle, however it must be clear that there will be safe access and egress in times of flood or have suitable flood evacuation plans. This is equally a concern if there is any risk of overland flows being captured within the depression of the site.</p> <p>14.2 It is important Cambridgeshire County Council as the Lead Local Flood Authority (LLFA) retains a role in consenting any structures in watercourses under the DCO and that sufficient protective provisions are put in place.</p> <p>14.3 7.1.5 of the Flood Risk Assessment [AAP-151] indicates that if groundwater emerges at the surface it will be managed as part of the surface water strategy. Calculations need to show the volume of groundwater accounted for in the Surface Water Drainage Strategy.</p>	<p>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.</p> <p>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 SoCG with the County Council and in the Protective Provisions sought to be agreed with the Lead Local Flood Authority.</p> <p>14.3 Requirement 15 within the dDCO (App Doc Ref 2.1) [AS-139] 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 Doc Ref 5.4.20.12) [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</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>14.4 Clarity should be provided on the meaning of “water returned to the head of the system for treatment” for the potentially contaminated water. (Environmental Statement, Chapter 20, Water Resources, [AAP-052] Pp45 Table 2-6: Primary and tertiary mitigation measures relating to water resources adopted as part of the Proposed Development).</p> <p>Whilst the LLFA is not opposed to the principle, as this reduces the risk of pollution to the surrounding watercourse network, clarity should be provided on whether this is the foul treatment works or head of a surface water treatment system. If this is the former, then it should be clear that there is capacity in the design of the system to take the proposed increase in foul water, as well as the critical storm in times of contamination from all surfaces.</p> <p>14.5 It is not clear why a 20Ha area has been used for the calculation of the discharge rate as the area draining through areas 3 and 7 only totals 12.4Ha, as set out in Table 4-1 of the Environmental Statement Chapter 20, Water Resources [AAP-052]. This needs to be relevant to only the drained areas.</p>	<p>design The Applicant therefore considers that Requirement 15 of the dDCO (App Doc Ref 2.1) [AS-139] and the approval of the detailed drainage design addresses this comment.</p> <p>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 proposed WWTP and there is not a segregated surface water drainage treatment facility. The anticipated returned flows to the proposed WWTP have been allowed for in the calculations of up to 50l/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 that point the storm flows will then be returned to the proposed WWTP for treatment.</p> <p>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 (table 4-1) (App Doc Ref 5.4.20.12) [APP-162] 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,</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>14.6 The rainwater harvesting tank will need to have the overflow connected to a viable point of discharge. It is noted in paragraph 4.8.3 of the Drainage Strategy (Appendix 20.12) [APP-162] that it is to be self-contained or overflow to a soakaway. The rainwater harvesting is supported as an inclusion; however, this should not be treated as attenuation storage and the system will need to accommodate any runoff from these roofs.</p> <p>14.7 The proposed runoff from the access road may require an additional stage of treatment if this is to be utilised by larger vehicles to ensure that all water is suitably treated before discharge.</p> <p>14.8 A detailed drainage layout plan should be submitted to clearly show the extent of drained areas within the WWTP area. The proposed extent of permeable paving, discharge locations, attenuation facility etc covering all surfaces of the proposed system should all be included on the drainage layout plan.</p>	<p>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 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.</p> <p>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, the Applicant can confirm 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') of the Drainage Strategy (Appendix 20.12) [APP-162] which confirms that any overflow from the RWH system will be diverted to the main drainage system for the site.</p> <p>14.7</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>14.9 Volumetric hydraulic calculations should be clearly submitted showing the required volume of attenuation required in the 100%, 3.3% and 1% Annual Exceedance Probability (AEP) storm events, including climate change allowances on the 3.3% and 1% AEP storms. This should include the use of FSR rainfall data for the 15 and 30 minute storms and FEH rainfall data for storms of 60 minutes or greater.</p>	<p>The Applicant refers to the response to point 14.3 above and the detailed design phase and associated approval process related to Requirement 15 of the dDCO (App Doc Ref 2.1) [AS-139].</p> <p>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 of the dDCO (App Doc Ref 2.1) [AS-139]. A detailed site drainage plan will be prepared and provided to the LLFA as part of this approval process.</p> <p>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 of the dDCO (App Doc Ref 2.1) [AS-139]. Detailed volumetric calculations would be provided to the LLFA as part of this approval process.</p>
<p>15 Other Documents</p>	<p>15.1 The Council may raise further comments on the Planning Statement and other documents as part of the application through the Local Impact Report.</p>	<p>The Applicant acknowledges the comment and would be happy to discuss any queries as part of the engagement to agree the SoCG for submission during the Examination.</p>

Table 3-4 Cambridge City Council (RR-002)

Reference	Relevant Representation Comment	Applicant's Response
<p>Air Quality 37. 38.</p>	<p>The City Council is satisfied with the scope, methodology and results / conclusions of Chapter 7 (Air Quality) of the ES when considering potential impacts within the City boundary.</p>	<p>The Applicant notes the City Council's comment regarding airborne dust and emission control management and monitoring during decommissioning and can confirm this will</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>The City Council also accepts and agrees that there are unlikely to be any significant air quality impacts within the administrative boundary of Cambridge City from decommissioning of the existing site or from the construction and operation of the new site. The City Council intends to comment upon the Decommissioning Management Plan (DMP) proposed to be agreed / approved with the Applicant prior to works commencing. In particular, the City Council would recommend that airborne dust and emission control, management and monitoring during decommissioning should be captured within the DMP document to help minimise impacts of that phase of work.</p>	<p>be captured within the outline Decommissioning Management Plan (DMP) (App Doc Ref 5.4.2.3) [AS-051].</p> <p>Paragraph 5.1.14 of the outline Decommissioning Plan (App Doc Ref 5.4.2.3) [AS-051] states 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) [APP-068] and AS-161] to manage risks to the environment. Where required, during the detailed design stage, specific measures may be developed in the Decommissioning Plan. For example, task specific Risk Assessments or Impact Plans will be put in place for decommissioning activities which may cause risk to pollution.</p>
Health 40.	<p>The City Council will seek, however, to ensure a community liaison plan is put in place to proactively inform local communities and stakeholders of any works and proposed duration where it falls outside of agreed core working hours or poses obstruction to ProWs, businesses, facilities and local infrastructure.</p>	<p>The Applicant confirms that a community liaison plan will be put in place and developed in collaboration with the community. The plan is submitted within the DCO Community Liaison Plan (App Doc Ref 7.8) [AS-132]. Additionally, the ES Volume 4 Chapter 2 Appendix 2.1 Code of Construction Practice Part A (APP Doc Ref 5.4.2.1) [APP-068] sets out construction working hours and any restrictions in access to PRow.</p>
Health 41.	<p>In addition, in respect of decommissioning, the report has not outlined the anticipated duration of the decommissioning phase, nor the process involved. The City Council considers that this should be clearly outlined by the applicant and thereafter the DCO needs to ensure that negative impacts have been appropriately mitigated. In addition, details of any security measures planned to minimise the risk of anti-social behaviour following the</p>	<p>Table 3-1 within the ES Chapter 2: Project Description (App Doc Ref 5.2.2) [APP-034] sets out the description of the main construction phases and activities, including decommissioning which is indicated as being in year 4 of the programme. Figure 3.1 within Chapter 2 includes an anticipated programme including decommissioning. Paragraph 3.1.4 (final bullet point) of ES Chapter 2: Project Description (App Doc Ref 5.2.2) [APP-</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>decommissioning and prior to development of the site need to be outlined as well.</p>	<p>034] also indicates that decommissioning would be approximately 6-12 months.</p> <p>Paragraph 2.2.2 (final bullet points) of ES Chapter 2: Project Description (App Doc Ref 5.2.2) [APP-034] states that <i>'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'</i>.</p> <p>The Applicant, therefore, confirms that the duration of the decommissioning phase of the existing Cambridge WWTP is 6-12 months and is outlined in more detail in ES Chapter 2 Project Description (App Doc Ref 5.2.2) [APP-034].</p> <p>As part of the Application, the Applicant also submitted an Outline Decommissioning Plan (App Doc Ref 5.4.2.3) [AS-051]. This plan is an appendix to the ES and, within the relevant technical assessments, the Applicant describes how this phase will be mitigated for any adverse impacts.</p> <p>Following decommissioning, the site of the existing Cambridge WWTP will be made available to a developer of North East Cambridge in accordance with the Master Development</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Agreement (App Doc Ref 8.9), which has been included as part of the Applicant's submission at Deadline 1.</p> <p>With regard to minimising the risk of anti-social behaviour following the decommissioning, the decommissioning of the existing Cambridge WWTP for the purpose of permit surrender does not include the removal of the security fencing currently in place around the existing Cambridge WWTP. Following the decommissioning of the existing Cambridge WWTP it is envisaged that the site will be handed over to the master developer (see Master Development Agreement (App Doc Ref 8.9)), which has been included as part of the Applicant's submission at Deadline 1. They will take responsibility for the land and so will be implementing any required security requirements.</p>
Health 42.	<p>In respect of the mental health and wellbeing assessment, the City Council is satisfied that baseline measurements have been taken (page 13) however it is noted that there is no specific 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.</p>	<p>The Applicant has prepared the ES Appendix 12.3 Mental Wellbeing Impact Assessment (MWIA) (App Doc Ref 5.4.12.3) [AS-077], which does not recommend further Mental Wellbeing Impact Assessments. Comments or recommendations are set out in section 4 of ES Appendix 12.3 Mental Wellbeing Impact Assessment (MWIA) (App Doc Ref 5.4.12.3) [AS-077].</p>
Noise and Vibration 48. 49.	<p>Sensitivity used in the overall final significance of effect assessment, is determined based on consideration of the magnitude of an impact and the sensitivity of the receptor affected by the impact of that magnitude. In terms of the four sensitivities (Low, Medium, High and Very High), residential properties have been classified as having a</p>	<p>The Applicant notes that 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 the ES Chapter 17 Noise and Vibration (App Doc Ref 5.2.17) [AS-036]</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Medium Sensitivity - Moderate tolerance to change and of Moderate quality/importance.</p> <p>The City Council considers from experience that residential properties (where people reside and sleep for long periods), are usually considered highly sensitive noise receptors with a low tolerance to change. In the City Council's view, they are not comparable as receptors to community facilities such as village halls and external spaces for recreational amenity such as parks and PRow. The assessment appears to have selected no receptors as being in the High to Very High category as they are subject to specific circumstances. The City Council considers therefore the noise assessment is likely to currently to underestimate the overall significance of effects assessment for residential receptors as reported and either the applicant needs to explain why the classifications of residential properties are correct s having 'Medium Sensitivity' or to reassess using the more appropriate criteria.</p>	<p>Table 2-7 which considers factors such as their ability to absorb change, their importance and value.</p> <p>Residential receptors within the study area have been selected to have medium sensitivity. It is noted that 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). On this basis the assessment of likely significant effects does not underestimate significance but aligns with relevant guidance and standards</p>
<p>Noise and vibration 50. 51.</p>	<p>Due to the location and distance of the new main WWTP facility from the administrative boundary of Cambridge City (to the north-east of Cambridge and 2km to the east of the existing Cambridge WWTP), the City Council accepts that operational noise from this facility is unlikely to have any impact on the City itself and receptors within. 51. However, the City Council notes reference to a permanent waste water transfer tunnel vent stack (WTTVS located at Shaft 1) is to be provided within the existing Cambridge WWTP site following relocation which will include provision for a</p>	<p>The Applicant confirms the requirement for the vent stack and dosing facility. The ES Chapter 18 Odour (App Doc Ref 5.2.18) [APP-050] Table 2-11 indicates that the structure will include 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.</p> <p>Section 4.3 of the ES Chapter 18 Odour (App Doc Ref 5.2.18) [APP-050] describes the assessment of the operation of the vent. Paragraph 4.3.73 indicates the likely odour effect is</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>chemical dosing facility (located on the existing WWTP upstream of a new Shaft 1) to prevent septicity and therefore odour formation. The new interception Shaft 1 appears to be annotated as '18. Interception and first construction shaft' [on drawing no. 00001-100006-CAMEST-ZZZ-LAY-Z-9001- Rev.C02– 4.3.3 - Works Plans Revision No. 02, April 2023 Sheet 1]. This appears to be located in the southwest corner of the existing CWWTP site, to the east of the existing Mike George Waste Processing Facility</p>	<p>expected to be, at worst, Negligible at the nearest receptor locations based on the frequency, intensity and duration of any effects, the source odour potential, pathway effectiveness, sensitivity of receptors and the function of embedded odour control features. The assessment considers that the risk of odour will be mitigated through use of a permanent vent stack inclusive of carbon filter. The residual impact is negligible and not significant.</p>
<p>Noise and Vibration 54.</p>	<p>The City Council intends to make more detailed comments about proposed construction hours and in particular will raise the issues on sufficient mitigation for any specific construction activities which are said to need to take place on a continuous 24-hour, 7 day a week basis for longer durations e.g., tunnelling and underground work and pumping and dewatering of deep shafts / excavations and some on an intermittent / short-term basis. Such night-time working will need very careful control and noise mitigation, and any peak impulsive noises during the night-time period will need specific consideration as they can be very disturbing.</p>	<p>The Applicant notes the City Council intends to make more detailed comments and the Applicant looks forward to receiving and responding to them.</p> <p>In the meantime, the Applicant would refer the City Council to the Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [APP-068] where the measures required in relation to the mitigation of noise are described.</p>
<p>Noise and Vibration 55.</p>	<p>In addition, the City Council will make further comments upon the details of any CEMP proposed and how it is to be approved through the DCO provisions.</p>	<p>The Applicant notes the response and awaits any further comments.</p> <p>The Applicant refers to Requirement 9 of the dDCO (App Doc Ref 2.1 [AS-139] which secures the provision of a noise and vibration management plan for each phase of the Proposed Development, to be submitted and approved alongside the Construction Environmental Management Plan for such phase.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Through this approval process, the Applicant would agree with the complaint notification procedure and monitoring schedule with the relevant Council. The Applicant, therefore, considers that Requirement 9 of the dDCO (App Doc Ref 2.1 [AS-139] and the approval of the management plans sufficiently addresses this comment.</p>
<p>Odour 60.</p>	<p>The City Council is also concerned that only a Preliminary Odour Management Plan ('OMP') (Appendix 18.4, App Doc Ref 5.18.4) has been drafted, which is considered secondary mitigation for the purpose of this Application and will likely form the baseline of the OMP submitted as part of the Environment Agency IED permit application. The OMP would be subject to and controlled under the Environmental Permit, regulated by the Environment Agency.</p>	<p>The Applicant notes the comment.</p>
<p>Odour 61.</p>	<p>Given the implications of this matter the City Council sets out below the specific action that it considers the applicant should take and address in order for this matter to be properly understood and assessed:</p> <ul style="list-style-type: none"> i. Within the Preliminary OMP (Appendix 18.4, App Doc Ref 5.18.4) it is stated that 'This may include separate discrete OMPs for specific areas of the proposed WWTW which may sit outside the Environmental Permit'. No reference to WWTTVS odour mitigation is referred to in section 5.2 on securing mitigation. The Council is therefore concerned that certain OMP mitigation measures may fall outside the IED permit application e.g. waste water transfer tunnel vent stack (WWTTVS) carbon filter etc maintenance. The applicant should therefore clarify if the OMPs 	<p>The Applicant notes the comments. In relation to the Preliminary Odour Management Plan (App Doc Ref 5.4.18.4) [AS-106] the Applicant refers to Requirement 20 (Odour management plan) of the dDCO (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. The detailed odour management plan must be in accordance with the measures in the ES Volume 4 Chapter 18 Appendix 18.4 Preliminary Odour Management Plan (App Doc Ref 5.4.18.4) [AS-106] and the principles and assessments set out in the relevant part of the environmental statement. The authorised development must be operated in accordance with the approved odour management plan.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>mitigation measures for the WWTTVS that will be in the City Council boundary will fall outside the actual IED permit application the OMP. In such circumstances therefore then the City Council considers that certain aspects of OMP should be secured under a DCO requirement or an article with in the DCO to ensure they are implemented and retained.</p>	<p>Through this approval process, the Applicant would agree with the City Council the necessary measures in relation to the vent.</p> <p>The Applicant also refers to Requirement 7 of the dDCO (App Doc Ref 2.1) [AS-139] which requires that details submitted for approval by the local planning authority are in accordance with the design objectives set out within the Design and Access Statement (App Doc 7.6) [AS-168] which includes Objective 3.2 Minimise impact of odour, through layout of the plant and specification of equipment.</p> <p>The Applicant therefore considers that Requirements 7 and 20 of the dDCO (App Doc Ref 2.1) [AS-139] and the approval of the detailed design and detailed management plan sufficiently addresses this comment.</p>

3.2 Parish Councils

Table 3-5 Teversham Parish Council (RR-009)

Reference	Relevant Representation Comment	Applicant's Response
Green belt	As a Parish Council nearby we have concerns about the proposed relocation on the green belt and the precedent this sets for other development (we are already aware of other proposals).	The Applicant notes and the comment and refers to the Common Theme response 2.3 above regarding Development within the Green Belt.
Traffic	We have concerns about increased traffic and the impact the proposed location will have to the A14 and surrounding roads.	<p><u>Construction and Operational Traffic</u> The Applicant notes the comment and refers to the Common Theme response 2.6 above regarding Traffic Management.</p> <p><u>Permanent Site Access</u> Design Plans – Highways and Site Access (App Doc Ref 4.11) [APP-025] illustrate the proposed junction layout which, once constructed, will be used by construction and operational traffic to access the proposed WWTP. The design of the permanent site access incorporates a traffic island to prevent 'right turns' onto the Horningsea Road and the configuration of the existing signalised junction to take vehicles directly into the proposed WWTP from the A14, limiting vehicle movements on the local road network. The Applicant refers to the transport assessment set out in (App Doc Ref 5.4.19.3) {AS-108a, AS-108b and AS-135}.</p> <p>The design of the permanent site layout and the highway improvements proposed to the immediate vicinity of the permanent access to the proposed WWTP have been</p>

Reference	Relevant Representation Comment	Applicant's Response
		informed through consultation with stakeholders and the community.
	We have concerns relating to the carbon accounting related to the new site and the decommissioning of the existing site.	ES Chapter 10 - Carbon (App Doc Ref 5.2.10) [APP-042] provides an assessment of carbon emissions and proposed mitigation measures for the land use changes, decommissioning of the existing facility, construction of the Proposed Development (including embedded carbon in materials) and the operation of the Proposed Development.
	We are concerned with increased flooding and contamination risks both in area around new site and the River Cam.	<p>The Applicant understands the concern in relation to flood risk and contamination. These have been considered and managed in the Application as follows.</p> <p><u>Flood risk</u> The Application includes an assessment of flood risk contained within ES Volume 4 Chapter 20 Appendix 20.1 Flood Risk Assessment (App Doc 5.4.20.1) [APP-151].</p> <p><u>Contamination mitigation measures</u> ES Chapter 20 Water resources (App Doc Ref 5.2.20) [AS-040] details a number of measures in relation to the prevention and control of contamination risks to surface and groundwater (see Tables 5-1 and 5-2). Requirement 8 of Schedule 2 of the dDCO (App Doc Ref 2.1 [AS-139]), requires the Applicant to undertake each phase of development in accordance with the Code of Construction Practice Parts A and B (App Doc Refs 5.4.2.1. and 5.4.2.2) [APP-068 and AS-161]. The management of contamination risk through the management of construction activities is described within the CoCP Part A and B (Appendix 2.1 and 2.2) (App Doc Ref</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>5.4.2.1 and 5.4.2.2) [APP-068 and AS-161]. In particular, in section 4.4 it describes the requirements on the Principal Contractor(s) to produce a Water Quality Management Plan(s), Pollution Incident Control Plan, and risk assessments before works commence on site.</p> <p>The design also includes a number of features in relation to the control of contamination risk. These are described in ES Chapter 20 Water resources (App Doc Ref 5.2.20) [AS-040] and include a segregated drainage system in areas of potential contamination within the proposed WWTP.</p> <p>This proposed WWTP will be subject to controls and monitoring systems defined within an Environmental Permit issued by the Environment Agency through The Environmental Permitting (England and Wales) Regulations 2016. The existing Cambridge WWTP is currently managed under an Environmental Permit issued by the Environment Agency. See the Consents and Other Permits Register (App Doc Ref 7.1) [AS-123].</p> <p>The Environmental Permit for the proposed WWTP (see the Consents and Other Permits Register (App Doc Ref 7.1) [AS-123]) requires a written management system to be in place in the form of an Environmental Management System (EMS). The EMS covers general management of the proposed WWTP, equipment maintenance, contingency plans, accident prevention and emergency response (including pollution response) as well as defining monitoring activities. The EMS</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>therefore covers a number of management systems, scoped and configured to provide the best overall level of assurance and value to the Applicant. The activities that the Applicant will carry out in operating the plant are covered by the ISO 9001 Quality Management standard and will be subject to external audit and accreditation.</p>

Table 3-6: Fen Ditton Parish Council (RR-006)

Reference	Relevant Representation Comment	Applicant's Response
	<p>We oppose the selection of Site 3 at Honey Hill for a new AWS wastewater treatment works. FDPC object to developments in the Green Belt since it preserves the character of Fen Ditton as a historic community surrounded by open, green space separating us from the city. FDPC have consistently promoted the concept of the land south, east and north east of the built-up village and conservation areas both remaining undeveloped and providing an additional Green Lung leading off the Cambridge Green Lung extending along the River Cam and linking Ditton Meadows/Stourbridge Common with the area of open farmland to the north east. The Honey Hill proposal negates this.</p>	<p>The Applicant notes the comment and refers to the Common Theme response 2.3 above regarding development within the Green Belt.</p>
	<p>We suggest Anglian Water has failed to provide sufficient grounds to justify such a move especially given the high levels of opposition in the community to it. FDPC has responded to all the consultations relating to the proposed CWWTPR including its earlier manifestation in 2006/08. We note Anglian Water's most recent response</p>	<p>In Section 6.2 of the Planning Statement (App Doc Ref 7.5) [AS-166] the Applicant has set out the Very Special Circumstances case of the Proposed Development. In particular, paragraphs 6.2.6 to 6.2.12 detail the assessment of sites, the suitability of the chosen site, and outlines the lack of alternative sites available. The Consultation Report (App Doc Ref 6.1) [AS-115]</p>

Reference	Relevant Representation Comment	Applicant's Response
	to us of 16 March 2023 and the discussion of many of our points in the current document suite. However we consider that although a few points have been resolved, the ensuing proposals are not satisfactory and that Anglian Water could and should do more to mitigate the impacts of the proposed project in the event that the move is approved in principle.	outlines how the Applicant consulted the local communities and residents and responded to their feedback. The Environmental Statement chapters present an assessment of effects on environmental and social receptors, such as on the landscape (see Environmental Statement - Volume 2 - Chapter 15 - Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034]. The assessments include proposed mitigation measures.

Table 3-7: Waterbeach Parish Council (RR-010)

Reference	Relevant Representation Comment	Applicant's Response
	Waterbeach Parish Council (WPC) strongly object to Anglian Water's proposal to relocate Milton WWTP from an industrial brownfield site to Honey Hill in the Cambridge Green Belt. The Milton site has recently been futureproofed at a cost of £17.4m. Anglian Water had stated that there is no operational need to move.	The Applicant notes the comment and refers to the Common Theme response 2.3 above regarding Development within the Green Belt. The Applicant also refers to the Planning Statement (App Doc Ref 7.5) [AS-166] which addresses the need for the project.

Table 3-8: Stow-cum-Quy Parish Council (RR-008)

Reference	Relevant Representation Comment	Applicant's Response
	First and foremost, we do not believe the current planning application sufficiently justifies relocating the water treatment plan from its current location.	The Applicant acknowledges this concern and, in the Planning Statement (App Doc Ref 7.5) [APP-166], has presented its justification for relocating the existing Cambridge WWTP from its current location. The site

Reference	Relevant Representation Comment	Applicant's Response
		<p>selection and consideration of alternatives is presented in ES Chapter 3 Site Selection and Alternatives (App Doc Ref 5.2.3) -[AS-018].</p>
	<p>The relocation application itself specifies that Anglian Water has purposefully not provided a joint application with any new housing development that may or may not be built on the land left behind. As such, the reason for relocation must be found necessary in its own right, and we cannot see sufficient reason for this.</p>	<p>The Applicant acknowledges this concern and the need for the Proposed Development is set out in the Planning Statement (App Doc Ref 7.5) [APP-166]. The Application will help South Cambridgeshire District Council achieve its long-held ambition to regenerate that part of the city where the existing Cambridge WWTP is located.</p>
	<p>In addition to there being insufficient justification for the relocation, it also comes at a significant cost to the new location, as the land to be built on is greenbelt land. Within the 'environmental impact' section of the application there is no mention of the carbon footprint of building of the new plant.</p> <p>At in-person consultation events and through formal written consultations, we have specifically asked Anglian Water to provide details of the carbon footprint of the new build, without success. We do not believe that it is acceptable to plan a build of this significance without at least acknowledge the extent of the carbon footprint of the new build and suggestions regarding how this can be off-set.</p>	<p>See the Common Theme response 2.3 above regarding Development within the Green Belt.</p> <p>ES Chapter 10 - Carbon (App Doc Ref 5.2.10) [APP-042] provides an assessment of carbon emissions and proposed mitigation measures for the land use changes, decommission the existing facility, construction of the Proposed Development (including embedded carbon in materials), and the operation of the Proposed Development.</p>
	<p>In terms of the carbon footprint of the decommissioning of the old (current) treatment plant, this has also been avoided in the application altogether.</p>	<p>The Applicant notes the comment in relation to carbon. An Outline Decommissioning Plan has been written (App Doc Ref 5.4.2.3) [AS-051] and was included as part of the Application.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>There is reference to a two-week programme to switch off the electricity, clean down relevant spaces and ensure water is prevented from collecting. The plan is then to leave it to the new developer to clean up. This again evidences a lack of responsibility and oversight from Anglian Water, noting that the current construction is largely made of concrete, a material which requires a huge carbon footprint to create and which is highly unlikely, to be used by any future developer.</p>	<p>The Applicant is working with the master developer (see App Doc Ref 8.9 which is part of the Applicant's submission at Deadline 1) of the existing Cambridge WWTP to help them understand what assets and infrastructure will remain in place.</p> <p>ES Chapter 10 – Carbon (App Doc Ref 5.2.10) [APP-042] includes the construction of the proposed WWTP (embedded carbon in materials), land use change (the net impact of land permanently required for the Proposed Development), operation of the proposed WWTP and decommissioning of the existing Cambridge WWTP. Carbon contained within the existing Cambridge WWTP is not part of the scope of this proposal and will be considered as part of a separate planning application. It is likely to include the effects of emissions from the plant used in demolition and the offset associated with the re-use of materials including secondary aggregate, recovered steel and equipment. The wider effects of changing the existing Cambridge WWTP are also covered by a separate strategic assessment. The demolition of the existing Cambridge WWTPR will not be included within ES Chapter 10 – Carbon (App Doc Ref 5.2.10) [APP-042]. The assessment will demonstrate the savings between the base case and the design presented within the Application.</p>
	<p>The plan mentions 15,000 new jobs will be created by the move. However, there is no information about what those jobs will be, whether they are jobs related to the construction of the new plant or will be secure roles. It is also unclear whether these roles may be an</p>	<p>The Applicant notes the comments regarding employment.</p> <p>The 15,000 jobs that are estimated to be created as a result of the relocation of the existing Cambridge WWTP and delivery of NECAPP will comprise permanent and temporary</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>advantage for local people or whether, if they are temporary and contracted roles, they are more likely to be roles for people employed elsewhere and brought into the area temporarily.</p>	<p>employment. There will be temporary employment with the construction of the Hartree development. The permanent roles, and who will be employed, will be market driven and not something the Applicant is able to comment on.</p> <p>In relation to the Proposed Development, Section 3.10 of the ES Chapter 2 – Project Description (App Doc Ref 5.2.2) [APP-034] sets out the forecast construction employment numbers. The operational workforce would be similar to the existing Cambridge WWTP, section 5 of the ES Chapter 2 – Project Description (App Doc Ref 5.2.2) [APP-034] sets out the proposed staffing level at full capacity. The effects of employment in relation to the Proposed Development and proposed mitigation measures are presented in the ES Chapter 11 – Community (App Doc Ref 5.2.11) [AS-028].</p>
	<p>The plans to reduce odour are based on a 5-year averaging of the wind. This is unhelpful for local residents, particularly Quy. When the wind is averaged out over 5 years, it shows a circular pattern staying close to the site, which shows little impact on the surrounding villages. However, from time to time we have strong North-West and Westerly winds, which would take the odour straight from the plant to Quy. If such winds have not even been taken account of in the planning of the new site then we are not confident that the current design will adequately limit the odour. Noticeable odour will have an obvious impact on the residents in numerous ways.</p>	<p>The Applicant notes the comments and confirms that modelling information in ES Chapter 18 – Odour (App Doc Ref 5.2.18 [APP-050] shows a negligible level of odour at the proposed WWTP. The Applicant confirms the design has been developed to mitigate odour, including there being only one filtered vent shaft. In line with the Institute of Air Quality Management (IAQM) guidance, the odour modelling has been assessed on the worst year out of the 5, not averaged over the 5 year period.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>We request that Anglian Water take account of all of the different types of wind that have been logged within the last five years and that the odour is accounted for in relation to each one.</p>	
	<p>In terms of the visual impact of the new site, it has been confirmed that the bund height around the edge is being limited to 5m, originally this was described as between 5-7 metres. The limited bund height is disappointing and is not sufficient to cover the 21.5m height of the towers. More could be done to limit the visibility of the towers by raising the bund height.</p>	<p>The Applicant responded to comments submitted during the Consultation process suggesting the earth bank height should be reduced to limit the visual impact to the area. The Applicant adapted the design and lowered a number of the larger structures within the proposed WWTP. The height of the earth bank was also reduced to reflect the amount of spoil that will be available to create it from a sustainable resource. More tree planting was introduced to further improve this reduction. The Consultation Report (App Doc Ref 6.1) [AS-115] outlines how the Applicant consulted the local communities and residents, and responded to their feedback.</p> <p>The effects, and associated proposed mitigation measures, on the landscape, heritage Conservation Areas, Public Rights of Way and public access are presented in the following documents.</p> <p>ES Chapter 15 – Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034] ES Chapter 13 – Historic environment (App Doc Ref 5.2.13) [AS-030] ES Chapter 11 – Community (App Doc Ref 5.2.11) [AS-028]</p>
	<p>Suggesting that trees will be planted on top of the bunds (in an exposed area) is not in itself sufficient further coverage. The 'environmental impact' section</p>	<p>Please see section 2.5 of this document.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>does not specify that mature trees will be used wherever possible in the planting design, despite our specific comments on this matter. Planting mature trees will make a big difference to the time taken for the planting to have an effect. There should be a commitment to planting primarily mature trees and to do so before the building work even commences, to ensure that the vegetation is given as much time as possible to provide coverage prior to the construction beginning.</p>	
	<p>The Cambridge aquifer is already limited and there are concerns about it continuing to be sufficient capacity for the people of Cambridge. There is a plan to bore 25m into the aquifer to build additional foundations for some of the buildings, it is unclear whether the impact of these plans have been considered in relation to the water supply.</p>	<p>The Applicant notes the comments. Assessment of the potential temporary impact of construction de-watering on groundwater is set out in application document ES Chapter – 20 Water Resources (App Doc Ref 5.2.20) [AS-040].</p> <p>ES Chapter 20 – Water Resources (App Doc Ref 5.2.8) [AS-040] does not identify any significant effects from the permanent structure foundations in relation to water supply.</p>
	<p>Light pollution from the new site is also a concern. While the plan refers to complying with the Local Authority in relation to light pollution, this does not give a specific plan for the impact of the light pollution, this also leaves significant discretion to the Local Authority. We are aware that the lighting for the new site would be at a lower height than that on the current site but that this would require more lighting at a lower level. While there is reference to 'wildlife sensitive' lighting in the plan, it is unclear what this means and</p>	<p>The Applicant notes the concerns. The assessment of effects from lighting, including on biodiversity, and proposed mitigation measures are set out in the following documents'</p> <p>ES Chapter 15 – Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100]</p> <p>ES Chapter 8 – Biodiversity (App Doc Ref 5.2.8) [AS-026]</p> <p>Tables 4-2 and 4-3 of ES Chapter 15 – Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100] also</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>what the actual impact will be on the wildlife, again, noting its previous greenbelt designation of the new build site. Furthermore, the plan states that while the treatment plant is being constructed there will be moderate significant impact for local residents in relation to lighting (and one can only assume on the wildlife). Noting the length of time that the build will take, this is concerning.</p> <p>While the plan indicates there will be some mitigation for residents when the planting matures, no comment is made regarding the wildlife in this matter. Within the 'environmental impact' section, any references to 'by year x' are not explicit about whether it will be x years from the initiation of the project or whether it is x years from when the build is complete. Clarification in this regarding would be helpful.</p>	<p>outline the lighting requirements of the Proposed Development, including durations of operation. The assessment considers the measures indicated in the lighting design strategy (App Doc Ref 5.4.2.5) [APP-072] which indicate 'the installation shall be designed to avoid light pollution beyond the site boundary and upwards into the surrounding atmosphere, particularly in rural areas'.</p> <p>The assessment presented in the ES Chapter 15 Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100] indicates the embedded, best practice and tertiary mitigation measures accounted for in the assessment. These are provided within Table 4-4 in ES Chapter 15 – Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100].</p> <p>No significant residual effects from lighting are reported within the assessment, taking into account the application of mitigation. The measures within Table 4.4 of ES Chapter 15 – Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100] are secured by the following requirements in Schedule 2 of the dDCO (App Doc Ref 2.1) [AS-139].</p> <p>Requirement 8: 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. This includes sections within the CoCP relating to lighting controls.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Requirement 9: 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.</p> <p>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.</p> <p>Requirement 7: 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 ES Volume 4 Chapter 2 – Appendix 2.5 Lighting Design Strategy (App Doc Ref 5.4.2.5) [AS-072].</p>
	<p>Finally, the plan to improve the proposed bridleway, between the site and Quy is unclear. In any case, there needs to be sufficient consideration given to prevent any unlawful vehicles using the bridleway, which is already a concern.</p>	<p>The Applicant notes the comments and is working with the Local Authority on measures to manage unlawful parking within the Section 106 agreement.</p>

Table 3-9: Horningsea Parish Council (RR-007)

Reference	Relevant Representation Comment	Applicant's Response
	<p>Even with the proposed mitigation, (chiefly tree planting), the PD would have a permanent detrimental impact on the setting of Horningsea and the approach to the village.</p>	<p>The Applicant notes the comments and has engaged with the Parish Council through the Community Working Group and responses submitted to each consultation phase to understand</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Furthermore, it would have a permanent detrimental impact on the approach to the historic city of Cambridge. This area of Green Belt is very important to the demarcation of Cambridge.</p>	<p>these concerns. The Consultation Report (App Doc Ref 6.1) [AS-115] outlines how the Applicant consulted the local communities and residents and responded to their feedback. See also the above Common Theme response 2.3 above regarding the Proposed Development within the Green Belt.</p>
	<p>The proposed relocation of the Cambridge Waste Water Treatment Plant (CWWTP) would introduce an industrial landscape into this area with views of the large structures from the far side of the river at Baits Bite Lock Conservation Area, and from Horningsea, Fen Ditton and Quy village Conservation Areas. The long open Fen views would be replaced by views of the new dense urban development of North East Cambridge along the tow path one side of the river and views of an industrial waste water treatment plant on the other. This area of Green Belt is important because it is situated between the new residential developments of Marleigh to the south and the developing Waterbeach New Town to the north, and in time, the large development at the airport site.</p> <p>The area is served by a number of important PRoWs (e.g. Harcamlow Way, Fen Rivers Way) and people need access to these open green spaces more than ever. It would be the first industrial development on Green Belt north of the A14 and a very inappropriate development in the Cambridge Green Belt The PD would fall within the southern boundary of the Wicken Fen Vision and be situated at the main access</p>	<p>The effects, and associated proposed mitigation measures, on the landscape, heritage Conservation Areas, Public Rights of Way and public access are presented in the following documents.</p> <p>ES Chapter 15 – Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034] ES Chapter 13 – Historic environment (App Doc Ref 5.2.13) [AS-030] ES Chapter 11 – Community (App Doc Ref 5.2.11) [AS-028] ES Chapter 19 – Traffic and Transport (App Doc Ref 5.2.19) [AS-038]</p> <p>See also the above Common Theme response 2.3 above regarding the Proposed Development within the Green Belt.</p>

Reference	Relevant Representation Comment	Applicant's Response
	point to the Wicken Fen project for the Cambridge and South Cambridgeshire population.	
Green Belt	We are concerned that the Applicant has consistently underestimated the importance of the Green Belt here and not taken sufficient account of the irreparable damage that an industrial development of this scale would cause to the wider area.	See also the above Common Theme response 2.3 above regarding the Proposed Development within the Green Belt.
	<p>Insufficient justification for relocation in the Local Plan The Local Plans, adopted 2018, refer to Cambridge Northern Fringe East development and the future preparation of an Area Action Plan for the site but they do not support relocation of the CWWTP to Green Belt The North East Cambridge Area Action Plan (NECAAP) has only reached the draft stage and consultation on NECAAP has been halted until after the decision of the DCO. We feel that the fact that the development relies on the relocation of the plant to Green Belt has not been presented to the public. NECAAP has not been tested at Examination and it is not certain that the plan can even be achieved: the land has to be purchased from the landowners.</p> <p>The emerging Local Plan First Proposals included North East Cambridge as one of 6 'strategic' housing and employment locations for development up to and beyond 2041, but does not make provision for the relocation of the CWWTP. In fact, the Strategy Paper accompanying the Greater Cambridge Local Plan First Proposals (GCLP), Topic Paper 1: Strategy, Sept 2021, (p74) states that in the case of the emerging Local</p>	See also the above Common Theme response 2.3 above regarding the Proposed Development within the Green Belt.

Reference	Relevant Representation Comment	Applicant's Response
	<p>Plan, the exceptional circumstances needed to justify Green Belt release only occur in the case of one small site near the Cambridge Biomedical Campus.</p> <p>The GCLP is very much in development and this is now set against a change in national planning policy which gives the Local Planning Authorities more freedom to set local housing targets. Contrary to National Planning Policy Framework (NPPF) and Local Plans The NPPF provides very strong protection for the Green Belt and release of an area Green Belt is required to go through a rigorous planning process and detailed consultation with the public, and this has not taken place. The PD is also contrary to local planning policies: development in rural areas (SCDC LP 2018 Policy S/6.4), protection and enhancement of landscape character (Policy NH/2) and protection of heritage assets (Policy NH/14;6.49)</p>	
	<p>The need for the relocation has not been demonstrated AW have stated repeatedly that there is no operational need for the plant to move ,</p>	<p>See also the above Common Theme response 2.3 above regarding the Proposed Development within the Green Belt.</p>
	<p>Therefore, the project could not and would not come forward in the NEP.' Planning Statement, Application Document Reference: 7.5 , Para 2.4.24</p> <p>In the Scoping Opinion , Greater Cambridge Shared Planning note the following: "We would like to clarify that the relocation of the Cambridge WWTP is not a "requirement" of the North-East Cambridge Area Action Plan and must not be referred to as such." Appendix 4.1 : Scoping Opinion, Section 5.4.4.1, p66 The WWTP was upgraded recently (2015-2016)</p>	<p>See also the above Common Theme response 2.3 above regarding the Proposed Development within the Green Belt.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>with an investment of £21m and stated by Anglian Water to be 'future proofed' Lack of consideration of the works remaining at Cowley Road The existing site is perfect for the siting of a sewage works in the flat landscape, hidden from view by established vegetation, partially buried structures and on a site with other light industrial businesses.</p> <p>There is also room for consolidation, capacity increase and improvement of environmental and odour standards at the current 40 hectare site.</p> <p>The option of development around the plant at the current site has not been adequately investigated by Anglian Water. We have only been given the option of full scale development at North East Cambridge and we have not been provided with any detailed feasibility studies that evaluate the range of options for the site. Since alternatives have not been properly considered we don't feel that very special circumstances have been demonstrated to justify creation of a new industrial area on the Green Belt so near to our village.</p>	
	<p>Anglian Water did not include Green Belt designation as a constraint at Stage 1 site selection. The value and importance of each site in Green Belt terms was not considered. No weight was given to the importance of the most productive agricultural land 14 potential sites were identified from a list of 99 unconstrained areas. The multiple criteria used were given equal weight in the selection process and crude fixed buffer zones were drawn around sensitive receptors. Sites</p>	<p>See also the above Common Theme response 2.3 above regarding the Proposed Development within the Green Belt.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>that were less than 400m from all dwellings were then excluded. Sites with a small number of dwellings within a 200m to 400 metre zone could have been included at this point. The constraints and buffers used at Stage 1 to identify additional site areas were not included in Stage 2; this would have identified more potential sites, within and outside the Green Belt. Cost appeared to be the overriding factor in the selection of the final 3 sites rather than proper consideration of the harm to the Green Belt. Sites A, B and C were outside the Green Belt but rejected on affordability grounds estimated to be more than the HIF grant provided. Site 2 was rejected because Trinity College had indicated that it wanted to expand the Cambridge Science Park. This was subsequently rejected in the Local Plan First Proposals in 2021</p> <p>The Applicant chose Honey Hill (Site 3) as the preferred option in spite of the fact that they acknowledged that building here would cause most harm to the Green Belt. Anglian Water's Environmental Assessment 2021 stated: ' A development on Site 3 would result in the most widespread landscape and visual effects owing to the site location being in open and undeveloped countryside.' Cambridge Waste Water Treatment Plant Relocation Stage 4 - Final Site Selection , Appendix B, Environmental Assessment, B.2.51, p160, CWWTPR-Stage-4-Final-Site-Selection-Appendix-B-Environmental-assessment.pdf</p>	<p>See also the above Common Theme response 2.3 above regarding the Proposed Development within the Green Belt.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>This area is open, with little screening vegetation and is part of the open countryside which stretches into fenland and chalkland landscapes to the north and east respectively. The scale and industrial appearance of the structures would be wholly uncharacteristic of the existing built development in an area which currently comprises small villages and isolated farmhouses.</p>	<p>The effects of the proposed development on the landscape are assessed and mitigation measures proposed in ES Chapter 15 – Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034].</p>
	<p>The Stage 4 final site selection process also introduced a non-statutory Consultation, that pitted the villages against each other and resulted in the location with the smallest population being chosen as the site for the relocation. In spite of this, over 50% of respondents wanted the CWWTP to stay where it was, only 10% felt it should move from the current site in Cowley Road. The non-statutory Consultation did not include residents of Northeast Cambridge (c 9,500) despite the potential for damaging impact on them by increased traffic at junction 34 of the A14, the work on the new development of Marleigh, the impact of pipeline construction from Waterbeach and the increased traffic from Waterbeach New Town.</p> <p>Lack of meaningful consultation We did not feel that the Applicant really listened to the community. The only request that was granted was the removal of the ugly metal fence that was proposed for the top of the bund. The community requested that the</p>	<p><u>Site selection and consultation</u> The Applicant refers the Parish Council to the Statement of Community Consultation (SOCC), a statutory document, prepared in accordance with the Planning Act 2008. The core and wider consultation map was agreed as part of the SOCC. The approach to consultation was agreed with Cambridge City Council, Cambridge County Council, South Cambridgeshire District Council, East Cambridgeshire District Council and the Cambridgeshire and Peterborough Combined Authority. The SOCC published in 2021.</p> <p><u>Consultation</u> The Consultation Report (App Doc Ref 6.1) [AS-115] outlines how the Applicant consulted the local communities and residents and responded to their feedback, including adapting the design of the proposed development to take into account</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>structures be sunken to reduce the impact on the openness of the Fen landscape and the conservation areas, but the Applicant rejected this on the grounds of it being too costly and due to issues with ground water. This suggested that it was completely the wrong site. The bund, which was intended to hide 'all but the tallest structures' has now been reduced in height to 5 metres (initially 7-11m).</p> <p>The community requested Access from J34 of the A14 In the Phase 2 Consultation Summary Report the strength of community feeling about access was apparent.</p> <p>We have only been presented with one design. It was not until the Consultation 3, PEI: Introductory Paper that we were given brief information about 2 other designs, which had already been discounted. One seemed to be more sunken but rejected because too costly but also concerns about groundwater contamination which had not been mentioned before.</p> <p>The Parish Councils were excluded from the design presentation process.</p>	<p>concerns about the height of the earth bund and structures within the proposed WWTP.</p> <p>The Consultation Report (App Doc Ref 6.1) [AS-115] outlines how the Applicant complied with the consultation requirements of the Planning Act 2008 to consult with interested parties, including the local communities and residents and Parish Councils.</p>
Traffic	<p>The community overwhelmingly supported dedicated access to the site. If the project really is a nationally significant infrastructure project, why is the access to the site not from a nationally significant road i.e., the A14?</p> <p>Why does Horningsea and the other communities have to bear the burden of increased construction and operational heavy traffic via local C-roads?</p>	<p>The Applicant notes the comments. During the consultation process to identify a suitable access for the proposed WWTP the Applicant proposed Option 3 which consisted of an access directly off the A14. This option was not acceptable to National Highways due to safety concerns and non-policy compliance (DfT Circular 01/2022, paragraph 20) so this option was not pursued.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Construction traffic would cause significant disruption for a significant period of time.</p> <p>The Horningsea Road is a major local route for Horningsea residents and other users accessing the A14, the city, and in particular, it is used as a route to the local primary school. Any problems on this road results in traffic backing up into the villages of Horningsea and Fen Ditton Construction and operational traffic would have to exit the site onto Horningsea Road and then make a right turn onto the slip road to the A14. This could lead to queuing on the A14 bridge. There is no possibility of creating an extra lane for turning right on this stretch of road. Site traffic that leaves the site and needs to travel east, would have to turn off the A14 again at J33 and go around the roundabout to re-enter the A14 eastbound. Although traffic would not be able to exit the site and turn right into Horningsea village, it would be possible to turn left and continue on the B1047 and into Fen Ditton. We envisage that if there is any problem at the junction, or on the A14, HGVs would then have to travel through Fen Ditton village. We also believe that the appearance of the new junction, signage and lighting is totally out of keeping with the rural landscape.</p>	<p>In relation to the impact and design of the <u>new</u> junction configuration on traffic into Horningsea and Fen Ditton, the Design Plans – Highways and Site Access (App Doc Ref 4.11) [APP-025] illustrate the proposed junction layout which, once constructed, will be used by construction and operational traffic to access the proposed WWTP. The design of the permanent site access incorporates a traffic island to prevent 'right turns' towards Horningsea and the configuration of the existing signalised junction to take vehicles directly into the proposed WWTP from the A14, thereby limiting vehicle movements on the local road network.</p> <p>The design of the permanent site layout and the highway improvements proposed to the immediate vicinity of the permanent site access have been informed by consultation with stakeholders, including the Highway Authorities and the local community.</p> <p>With regards concerns related to the number of workers during the peak of construction, the effects and proposed mitigation are discussed in ES Chapter 19 – Traffic and Transport (App Doc Ref 5.2.19) [AS-038]. The mitigation measures will also be implemented through ES Chapter 19 – Appendix 19.7 Construction Traffic Management Plan (App Doc Ref 5.4.19.7) [AS-109] and ES Chapter 19 Appendix 19.10 - Outline Operational Logistics Traffic Plan (App Doc Ref 5.4.12.1) [AS-111].</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>At the peak of construction period there would be an estimated 422 workers on the site and although, car sharing, public transport is encouraged, it does not seem likely that it would be a convenient option for many workers. The site is not adequately served by public transport, there are only 2 buses a day.</p> <p>We take issue with Anglian Water's collision analysis in the vicinity of Horningsea, including Clayhithe.</p>	<p>Requirement 9, under Schedule 2 of the draft Development Consent Order [AS-039], also requires the Applicant to submit a construction environmental management plan (CEMP) to the relevant planning authority for approval prior to commencing the part of the development that plan relates to. The CEMP must contain a detailed construction traffic management plan.</p> <p>In relation to reducing vehicle trips by the construction workforce the Applicant intends to implement a construction worker travel plan (CWTP). An CWTP is provided in the ES Appendix 19.9 (App Doc Ref 5.4.19.9) [APP-150]. Requirement 9 within the dDCO (App Doc 2.1) [AS-139] secures the provision a detailed construction worker travel plan for each phase of the development, to be submitted and approved alongside the CEMP for such phase. This must accord with the measures within the CWTP, ES Appendix 19.9 (App Doc Ref 5.4.19.9) [APP-150]. Requirement 8 of the dDCO secures compliance with the Code of Construction Practice (see (App Doc Ref 2.1) [AS-139])).</p> <p>The Applicant has coordinated with the local highways team at Cambridgeshire County Council to agree the approach to Transport Assessment. The Applicant confirms that the collision analysis set out within paragraph 4.2.40 of the Transport Assessment (App Doc Ref 5.4.19.3) [AS-108a and 108b] covers the agreed with the LHA area during the pre-application stage and the findings detailed are agreed by the LHA.</p>
	<p>A number of residents raised concerns that questions submitted to Anglian Water during the consultation phases</p>	<p>The Consultation Report (App Doc Ref 6.1) [AS-115] outlines how the Applicant complied with the consultation</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>were not answered. COVID hampered consultation. There was an inadequate presentation of plans by Anglian Water to the community and lack of opportunity for 'town hall' type interaction. Residents who were not comfortable with Zoom and technology generally were disadvantaged by the process. More should have been done to create more public events Zoom sessions were very limited and not conducive to debate and interaction At the statutory Consultation 3, one online event was held on, Wednesday 9th March 2022 7pm-8.30. This was poorly publicised.</p> <p>The event was listed on p44 of the Phase 3 Community Consultation Leaflet, Feb 2022 CWWTPR-Phase-three-community-consultation-leaflet.pdf, but no instructions given on how to join the event and the fact that it had to be booked in order to receive the Zoom link. There was no information on how to register on the CWWTPR website and no Zoom link put up on the website. A number of people missed this event due to the poor information provided by Anglian Water One face to face meeting was provided for Horningsea on 22nd March – from 3pm to 7pm in the Village Hall. We consider this to have been very inadequate There was an internet outage period of 10 days during the consultation period which also made it very hard to engage with the online process (BT/Open Reach Major System Outage ref IMT32941/2). A request to increase the Consultation period was rejected by Anglian Water There were several ways of responding electronically at</p>	<p>requirements of the Planning Act 2008 to consult with interested parties, including the local communities and residents, and adapted to manage the challenges presented by the COVID restrictions, such as hosting COVID secure face to face events during the Phase Two consultation once the COVID restrictions were relaxed.</p> <p>The Applicant also notes that none of the local authorities consulted by the ExA, during acceptance of the application, raised any concerns regarding the adequacy of the consultation required to comply with the Planning Act 2008.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Consultation 3, but, confusingly, none of these methods offered the same questionnaire. The form was in pdf and could not easily be submitted electronically. Again, questions by residents put to Anglian Water via the advertised email address were not answered quickly or not answered at all.</p>	
	<p>Design The design was initially introduced to us as being 'sympathetic' to the landscape. But a circular bund 'rotunda' based on hill fort was out of place in this landscape – hedgerows and dykes are linear; note also the long avenue of trees from Biggin Abbey that point to the site at Honey Hill. The height of the bund was reduced because there was insufficient spoil, and more tree planting was introduced in order to try to mitigate the original design. This had the effect of creating a very prominent structure in the landscape; it would create a 5 metre block of bank with an assortment of buildings protruding from the top. Even at 5 metres there could be a deficit of up to 4373m square of material that needs to be trucked to the site. Environmental Statement Ch16 Material Resources and Waste, Application Document Reference 5.2.16, p51 We also have concern that this particular design constricts expansion and there will need to be expansion outside the bund at some point, for example, a requirement for larger storm tanks, so there will be further industrial creep.</p>	<p>The Design and Access Statement (App Doc Ref 7.6) [AS-168] describes the objectives, design principles and considerations that have informed site selection and design development of the proposed WWTP.</p> <p>As shown on Sheet 11 of the Works Plans (App Doc Ref 4.1.11) [AS-150], an area has been set aside within the earth bund for 'future works', thereby avoiding the need for expansion outside the earth bund.</p>
	<p>Aquifer</p>	

Reference	Relevant Representation Comment	Applicant's Response
	<p>We are very concerned about the PD being built over a Principal Chalk Aquifer. DEFRA mapping advises against development in this area due to the potential for contamination. The structures could not be buried because of the proximity of the aquifer. A small number of residents in the village have well water Pollution We are very concerned that there is too high a risk of pollution of the Quy Fen SSSI. There is the potential for contaminated runoff entering Black Ditch and being transported to Quy Fen SSSI. The site drainage pond is directly connected to Black Ditch.</p>	<p>The Applicant notes the concerns and the assessment of potential effects on the chalk aquifer and surface watercourses, including Black Ditch, are set out in ES Chapter 20 – Water Resources (App Doc Ref 5.2.20) [AS-040]. This document also details a number of measures in relation to the prevention and control of contamination risks to surface and groundwater (see Tables 5-1 and Table 5-2).</p> <p>Requirement 8 of Part 1 of Schedule 2 of the dDCO (App Doc Ref 2.1) [AS-139] also requires the Applicant to undertake each phase of development in accordance with application of the Code of Construction Practice Parts (CoCP) A and B [APP-068 and AS-161]. Contaminant risk through the management of construction activities are described within the CoCP Parts A and B, such as requiring the Principal Contractor(s) to produce a Water Quality Management Plan(s), Pollution Incident Control Plan, and risk assessments before works commence on site.</p> <p>The Applicant refers to Requirement 9 of Schedule 2 of the dDCO (App Doc Ref 2.1) [AS-139] which secures the provision of a Water Quality Management Plan(s) and Pollution Incident Control Plan for each phase of the development, to be submitted and approved alongside the CEMP for such phase. Requirement 8 of the dDCO (App Doc Ref 2.1) [AS-139] secures compliance with the Code of Construction Practice.</p> <p>The design also includes a number of features in relation to the control of contamination risk. These are described in ES Chapter 20 – Water Resources (App Doc Ref 5.2.20) [AS-040]</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>and include a segregated drainage system in areas of potential contamination within the proposed WWTP.</p> <p>During operation, the proposed WWTP will be subject to controls and monitoring systems defined within an Environmental Permit issued by the Environment Agency under the Environmental Permitting (England and Wales) Regulations 2016. The existing Cambridge WWTP is currently managed under such an Environmental Permit.</p> <p>The Environmental Permit for the proposed WWTP (see Consents and Other Permits Register (App Doc Ref 7.1) [AS-123]) requires a written management system to be in place in the form of an Environmental Management System (EMS). The EMS covers general management of the proposed WWTP, equipment maintenance, contingency plans, accident prevention and emergency response (including pollution response) as well as defining monitoring activities.</p>
	<p>Light pollution Introduction of light into a tranquil unlit area. Impact on wildlife.</p> <p>Odour Of particular concern to residents. We are not convinced that Anglian Water has taken into account increasing likelihood of very hot weather and drought conditions.</p>	<p>The Applicant notes the concerns and the assessment of effects from lighting, including on biodiversity, and possible changes due to climate change (e.g. hotter weather and droughts) are considered in the following documents.</p> <p>ES Chapter 15 – Appendix 15.3 Lighting Assessment Report (5.4.15.3) [AS-100] ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [AS-026] ES Chapter 9 - Climate Resilience (App Doc Ref 5.2.9) [APP-041]</p>
	<p>We are also concerned that the commissioning of the new plant would cause odour issues as the bioreactors are being</p>	<p><u>Odour</u></p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>'bedded in'. We are concerned that not enough investigation has gone into the potential for odour from the transfer tunnel and Waterbeach pipeline ventilation shafts.</p> <p>Office We question the need for offices for 60 people.</p> <p>Sludge lorries We are concerned that sludge is being imported by tankers from far locations</p>	<p>An assessment of odour impacts and proposed mitigation measures are presented in ES Chapter 18 – Appendix 18.2 Odour Impact Assessment (App Doc Ref 5.4.18.2) [APP-138]. Section 6 of the assessment concludes that proposed WWTP will have 'Negligible' odour impact to all known receptors, with the residual effects being "not significant".</p> <p>Requirement 20 of Schedule 2 of the dDCO (App Doc Ref 2.1) [AS-139] requires the Applicant to not start operating the proposed WWTP until an Odour Management Plan has been approved by the relevant authority; a preliminary version is presented as ES Chapter 18 – Appendix 18.4 Preliminary Odour Management Plan (App Doc Ref 5.4.18.4) [APP-140].</p> <p><u>Office provision</u> The operational workforce would be similar to the existing Cambridge WWTP. Section 5 of ES Chapter 2 – Project Description (App Doc Ref 5.2.2) [APP-034] sets out the proposed staffing level at full capacity. In addition to operational staff, there may occasions when the staff and visitor numbers increase the persons on site requiring office space. Paragraph 2.13.3 of ES Chapter 2 – Project Description (App Doc Ref 5.2.2) [APP-034] explains the inclusion of a Discovery Centre, located on part of the first floor which will provide an education space for invited visitors, as well as multipurpose meeting spaces and a viewing terrace.</p> <p><u>Sludge movements</u></p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Section 1.8 the ES Chapter 2 – Project Description (App Doc Ref 5.2.2) [APP-034] states that both the existing Cambridge WWTP and the proposed WWTP have been designed as “integrated treatment plants” incorporating a Sludge Treatment Centre (STC). The STC treats the sludge derived from the waste water being treated at the plant and the “wet sludge” produced by other satellite plants which do not have an integrated STC. The vehicle movements that use the existing Cambridge WWTP would be redistributed to the proposed WWTP. The redistribution of vehicles from the existing Cambridge WWTP to the proposed WWTP is considered within the ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) [AS-038].</p>
	<p>Health of residents Mental health of residents has been severely impacted. People feel anxious about the impact of an enormous construction site on their doorsteps, noise, pollution, the disruption to their travel to work and school, the impact on local footpaths and cycle routes. The perception that the village will forever be associated with a massive industrial development. The potential for odour inhibiting their enjoyment of the outdoors. There is a feeling of powerlessness and consultation fatigue – Waterbeach New Town, Waterbeach pipeline, Marleigh, a congestion charge, changes to Newmarket Road, development at the Airport site, and an incinerator, are some of the consultations all within a 3k radius . We weren't listened to from the beginning when 50% said leave it where it is Abbey Ward will</p>	<p>The effects, and associated proposed mitigation measures, on the local community and their health/wellbeing are presented in the following documents.</p> <p>ES Chapter 11 – Community (App Doc Ref 5.2.11) [AS-028] Health Evidence Review 12.2 (App Doc Ref 5.4.12.2) [APP-112] ES Chapter 12 – Health (App Doc Ref 5.2.12) [APP-044] ES Chapter 12 – Appendix 12.3 Health Mental Wellbeing Impact Assessment (App Doc Ref 5.4.12.3) [AS-077]</p> <p>The Consultation Report (App Doc Ref 6.1) [AS-115] outlines how the Applicant consulted the local communities and residents and responded to their feedback.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>be affected by the PD and this is one of the most deprived areas in Cambridge, and this should be more carefully considered Consultation took place during COVID. People felt isolated and unable to meet and discuss the issues.</p>	
	<p>Sustainability/Carbon Cost We are concerned about the carbon impact of rebuilding a perfectly functioning WWTP less that 2k from the existing WWTP. It is stated that 'Specifically, the Proposed Development will enable Cambridge City and South Cambridgeshire District Councils' long held ambition to develop a new low-carbon city district on Cambridge's last major brownfield site, known as NEC. ' Planning Statement, Application Document Reference: 7.5. Para 2.1.2, p15 How can this be sustainable if Green Belt is permanently harmed in the process? The purpose of building on brownfield is to avoid such development on Green Belt. The community is very concerned about this issue. The carbon paper: Planning Statement: Strategic Carbon Assessment, Application Document Reference: 7.5.2, provides us with the evidence that there would be massive carbon expenditure in demolition of the existing plant. The argument that not moving it would cause a higher carbon impact is based on pure supposition without real evidence. The core site housing could be located in more sustainable areas such as the Airport site. The complete decommissioning plus the demolition of the existing Cambridge WWTP, and the</p>	<p>The decommissioning of the existing Cambridge WWTP is assessed as per the scope of works described in Section 6 of ES - Volume 2 - Chapter 2 - Project Description (App Doc Ref 5.2.2) [APP-034].</p> <p>ES Chapter 10 – Carbon (App Doc Ref 5.2.10) [APP-042] provides an assessment of carbon emissions and proposed mitigation measures for the land use changes, decommissioning of the existing facility, construction of the Proposed Development (including embedded carbon in materials) and the operation of the Proposed Development.</p> <p>The Applicant has presented their justification for the proposed development in the green belt within the Planning Statement (App Doc Ref 7.5) [APP-166].</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>demolition of the existing Waterbeach Water Recycling Centre (WRC) is not assessed in this application.</p>	
	<p>Agricultural land The majority of the land required is Best Most Versatile : "The effect of the permanent loss of BMV land is moderate adverse and is significant". Environmental Statement, Non-Technical Summary, Application Document Reference: 5.1, Section 4.1 Agricultural Land and Soil, p24 This use of this land was found to have a 'moderate significant' effect on 11 farm businesses.</p> <p>Air Quality HPC is very concerned about dust generation and emissions from construction plant. It is a dry, very open flat site. The COCP is supposed to mitigate the potential for this, but there is a primary school with a playground about 750m from the site and concern has been expressed by the village about respiratory problems being exacerbated.</p>	<p><u><i>Agricultural land</i></u> The Applicant notes the comments in relation to the assessment of BMV and farm businesses. The effects are reported in the ES Chapter 6 – Agricultural Land and Soils (App Doc 5.2.6) [AS-024].</p> <p><u><i>Air quality</i></u> An assessment of impacts from dust, including on receptors including local residents, schools and farmland, is presented in ES Chapter 7 – Air Quality (App Doc Ref 5.2.7) [APP-039]. The assessment and proposed mitigation measures are based on guidance from the Institute of Air Quality Management.</p> <p>The Applicant refers to Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] which secures the provision of an air quality management plan for each phase of the development, to be submitted and approved alongside the CEMP for such phase. Requirement 8 of the dDCO (App Doc Ref 2.1) [AS-139] secures compliance with the Code of Construction Practice.</p>
	<p>Outfall This would have a significant impact on the River Cam by the construction of the large outfall structure. The Applicant acknowledges that the damage here cannot be mitigated</p>	<p>The effects of the new outfall on the river Cam, its users and users of connecting footpaths are assessed and mitigation measures proposed in the following documents.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>onsite and would have to purchase the remaining 'high distinctiveness river units'. There would be inconvenience to residents, river users and users of the footpaths</p>	<p>ES Chapter 20 – Water Resources (App Doc Ref 5.2.20) [AS-040] ES Chapter 11 – Community (App Doc Ref 5.2.11) [AS-028] ES Chapter 19 – Traffic and Transport (5.2.19) [AS-038] ES Chapter 15 – Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034]</p> <p>The Applicant makes a distinction between mitigation measures for habitat changes as a result of the outfall and BNG. The application of BNG is set out within the ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163].</p> <p>In relation to habitats affected by the Final Effluent Outfall within Works Plan 32 (see Works Plans (App Doc Ref 4.3) [AS-150]) the following measures will apply.</p> <p>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</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>These general applicable measures in the CoCP Part A would also apply.</p> <p>Requirement 8 of the dDCO (App Doc Ref 2.1) [AS-139] secures compliance with the Code of Construction Practice.</p> <p>The duration of the work in the area of the Final Effluent Outfall will be up to 12 months, with the in-river works lasting up to 4 months during the summer months.</p> <p>The ES Chapter 2 – Project Description (App Doc Ref 5.2.2) [AS-034] explains a temporary diversion of the PRoW (85/6) to maintain connectivity. Full details of the proposals are set out 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) [AS-017]. The diversions are likely to be required for a maximum period of 11 months. Furthermore, ES Chapter 2 Appendix 2.2 Code of Construction Practice Part B (App Doc Ref 5.4.2.2) [APP-069] notes that the usable width of the river Cam will be narrowed during construction of the outfall for a period of around 4 months. Whilst the navigable area will be narrowed the river Cam will remain navigable to all permitted users throughout this period. These measures will also be set out in the Outfall Management Plan secured by Requirement 10 of the dDCO (App Doc Ref 2.1) [AS-139]. Whilst Requirement 8 of the dDCO (App Doc Ref 2.1) [AS-139] secures compliance with the Code of Construction Practice.</p>
	Impact on local businesses	The effects of the Proposed Development on local businesses, during construction and operation, are assessed and mitigation

Reference	Relevant Representation Comment	Applicant's Response
	<p>Key impact on Horningsea would be the perception of its close proximity to the sewage works, the fear of traffic, road closures and odour. People are concerned about the viability of the Community Pub, still recovering from COVID. Concern about the Gayton Farm accommodation business due to blighted views and the work on the pipeline through their land. Poplar Hall Farm residents would have permanent access across their land.</p> <p>The Village hall regularly holds weddings and parties, yoga, painting, warm hub, coffee morning and toddler groups. It also hosts a senior's lunch for the village, the annual horticultural show and many other events.</p>	<p>measures proposed in ES Chapter 11 – Community (App Doc Ref 5.2.11) [AS-028], including Table 5-1 which presents a summary of community effects.</p>
	<p>Landscaping</p> <p>Tree and hedge planting is the main method of reducing the impact of the massive industrial structures in this open landscape, therefore this aspect of the application is very important to Horningsea residents.</p> <p>We are particularly concerned that the mature trees (up to 5m in height) would fail to establish on the earth bank, due to the thin soil, exposed site, wind rock and lack of water; we are regularly in drought conditions. We have a lot of evidence of local planting schemes that have failed. The planting of whips opposite the cemetery on Horningsea Road is now ten years old, few have survived and the height of the tallest is about 6 feet. A planting along the widened A14 has spectacularly failed recently. There is some provision for</p>	<p>The Applicant notes the comments and refers to the Common Theme response 2.5 above regarding the Proposed Development and Landscape Design.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>supplemental watering but we feel that the Applicant should install an irrigation system for the standard trees that are planned on the earth bank, and this water should be collected from rooves of the new WWTP.</p> <p>We are concerned that there are no clear pictures of the structures protruding from the bund to show how this would look during the winter , for example at Figure 3.5 Vegetation Growth Rate ? Earth Bank Elevation, p20, it would have been very helpful to have seen an outline of buildings above the treeline.</p>	
	<p>Funding We are concerned that there could be a funding shortfall that could lead to economising on the development and poor mitigation. There hasn't been enough clarity around funding of the project. The HIF grant was originally given for a maximum of £227 million to provide enough funds for the long tunnel option outside the Green Belt. The long tunnel route was removed at the start of the Options Appraisal stage. In addition, it is not clear how much money has been allocated to the payment of consultants and enabling works and what would be allocated to the actual building phase. Anglian Water has stated that there is no operational need to relocate the WWTP, therefore funding for the move cannot come from the regulated business. In view of the worsening economic climate, and the debt position of the water</p>	<p>Details regarding the funding of the Development can be found in the Funding Statement (App Doc Ref 3.2) [APP-013].</p>

Reference	Relevant Representation Comment	Applicant's Response
	companies, we would really like more assurance regarding contingency plans for overruns in cost.	

3.3 3(a) Statutory Parties

Table 3-9: East of England Ambulance Service NHS Trust (RR-012)

Reference	Relevant Representation Comment	Applicant's Response
<p>Project Environmental & Social Effects, Page 6</p>	<p>Review of the WWTP (Applicant's) Environmental Statement and related DCO documentation, indicate that the Scheme's potential impacts (effects) on EEAST's operational capacity, efficiency and resources (staff, vehicle fleet and estate assets) have not been baselined or sufficiently assessed or mitigated to date.</p> <p>EEAST is therefore liaising with AW to ensure this omission is addressed by further information being prepared to respond to EEAST's concerns, as necessary, and to inform a Statement of Common Ground - to provide a robust basis for assessment of the DCO Application, and to assist the Examination.</p> <p>In particular, EEAST wish to agree and secure suitable mitigation and management measures as part of the DCO Requirements and/ or via a Section 106 planning obligation (or Deed of Obligation) and reflect this position within a Statement of Common Ground by commencement (or at an early stage) of the forthcoming Examination.</p>	<p>The assessment provided in the Transport Assessment (App Doc Ref 5.4.19.3) [AS-10Ba – 108B] to ES Chapter 19 – Traffic and Transport (App Doc Ref 5.2.19) [AS-038] provides the predicted effects of construction traffic and operational traffic on the road network, which includes the emergency services response routines.</p> <p>The mitigation measures are set out in the Construction Traffic Management Plan (CTMP) [AS-109] and taken into account within the assessment reported in the Transport Assessment, principally the mitigation is to limit deliveries during peak hours in the morning, evening and at school pick-up, to minimise adverse delay to the road network.</p> <p>The community liaison proposals set out in the CTMP (App Doc Ref 5.4.19.7) [AS-109] includes a requirement to engage with the emergency services, alongside the City and District Councils, County Council etc., to ensure the impact on the transport network, including the emergency services operational requirements are minimised during construction. This is reflected in the combined Emergency Services Statement of Common Ground.</p> <p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] secures the provision of a CTMP [AS-109] and Community</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Liaison Plan (CLP) (App Doc Ref 7.8) [AS-132] for each phase of the development, to be submitted and approved alongside the CEMP for such phase.</p>
<p>Traffic & Transport Impacts & Highway Network Delay, Page 7</p>	<p>Information to determine the effect of increased HGV traffic, road closure, route diversion measures and transport/ road network management and its impact on EEAST's operational capacity, efficiency and resources is currently absent from the EIA and associated DCO documentation.</p> <p>These impacts on EEAST's operational capacity, efficiency and resources therefore need to be presented and assessed, and reflected in an agreed Statement of Common Ground setting out appropriate mitigation and management measures to be secured/ implemented through DCO Requirements, and/ or within a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.</p>	<p>The Traffic and Transport chapter of the ES (App Doc Ref 5.4.19.3) [AS-038] sets out the impacts of construction and operational flows associated with the Scheme on the road network based on the Institute of Environmental Management and Assessment (IEMA) guidance. The Transport Assessment (App Doc Ref 5.4.19.3) Chapter 19 Appendix 19.3 (Transport Assessment) taking into account mitigation and no significant effects are reported.</p> <p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] requires a CTMP (App Doc Ref 5.4.10.1) [AS-109] 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.</p> <p>As noted previously, the community liaison proposals set out in the CTMP (App Doc Ref 5.4.19.7) [AS-109] are intended to provide a regular opportunity for updating, reporting and providing monitoring for stakeholders.</p> <p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] secures the provision of a CTMP (App Doc Ref 5.4.19.7) [AS-109] and Community Liaison Plan (CLP) (App Doc Ref 7.8) [AS-132] for each phase of the development, to be submitted and approved alongside the CEMP for such phase.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The community liaison proposals set out in the CTMP (App Doc Ref 5.4.19.7) [AS-109] includes a requirement to engage with the emergency services, alongside City and District Councils, County Council etc., to ensure the impact on the transport network, including the emergency services operational requirements are minimised during construction. This is reflected in the combined Emergency Services Statement of Common Ground.</p>
<p>Abnormal Indivisible Loads (AIL), Page 7</p>	<p>It is evident that a significant level of AIL movements (including police escort) and hazardous waste transit, are required to deliver construction phase components to access points linked to the WWTP operations.</p> <p>Information to assess the nature, frequency, route management, reliance on police escort and expected time delays associated with AILs (and hazardous waste as appropriate) which are likely to directly impact on EEAST's operational capacity, efficiency and resources therefore needs to be clarified within the EIA and/ or associated DCO documentation.</p> <p>This information should be presented and assessed, and reflected in a Statement of Common Ground setting out appropriate mitigation, management and monitoring measures to be secured/ implemented through DCO Requirements, and/ or within a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.</p>	<p>The Applicant notes the comments. There are not expected to be significant numbers of abnormal indivisible loads.</p> <p>Those that are required would be managed through the CTMP (App Doc Ref 5.4.19.7) [AS-109] and adherence to established systems - Electronic Service Delivery for Abnormal Loads (ESDAL).</p> <p>In paragraph 4.2.5 of the CTMP (App Doc Ref 5.4.19.7) [AS-109] it 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].</p> <p>The community liaison commitment set out in the CTMP (App Doc Ref 5.4.19.7) [AS-109] is intended to provide a regular opportunity for updating, reporting and providing monitoring for stakeholders.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] requires a CTMP for each phase of the development to be submitted and approved by the local planning authority 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.</p> <p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] secures the provision of a CTMP and CLP for each phase of the development, to be submitted and approved by the LPA alongside the CEMP for such phase.</p>
<p>Major Accidents & Disasters, Page 8</p>	<p>Information to determine the effect of the demolition and construction phase and its impact on EEAST's operational capacity, efficiency and resources is currently absent from the EIA and associated DCO documentation.</p> <p>HSE's construction statistics and publications (for Great Britain) indicate that work related incidents, involving serious injury and fatalities, are statistically significantly higher for the construction industry as compared to the 'all industry' rate.</p> <p>In the event of a construction phase accident or incident, appropriate procedures would therefore need to be put in place for emergency access, on-site triage, medical</p>	<p>The Applicant confirms that there is no demolition related to the Proposed Development and refers to paragraph para 6.2.6 of ES Chapter 2 – Project Description (App Doc Ref 5.2.2) [APP-034] which states that 'Consent is not sought under the Development Consent Order for the subsequent demolition or redevelopment of the Cowley Road site'. Figure 1.1 which shows the relationship between the Proposed Development, the scope of the dDCO (App Doc Ref 2.1) [AS-139] and the future demolition and redevelopment of the site at Cowley Road (the existing Cambridge WWTP).</p> <p>The Applicant refers to ES Chapter 19 – Traffic and Transport (App Doc Ref 5.2.19) [AS-038] which reports impacts in</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>assessment and patient identification, stabilisation and transfer to an appropriate healthcare setting.</p> <p>In addition, plans and contingencies for emergency access, on-site triage, medical assessment, patient identification, stabilisation, clinical information, safe and efficient handover to EEAST responders within operationally optimal attendance times (noting the delay risks above) which in urgent cases may require Helicopter Emergency Medical Services (HEMS) access, are considered necessary.</p> <p>The incidence and impact of any potential significant or major accident (and any disaster) on EEAST and its HEMS partner operational capacity, efficiency and resources (including EEAST hazardous area response teams - HART) needs to be presented and assessed, and reflected in a Statement of Common Ground, with appropriate mitigation and management measures secured/ implemented through DCO Requirements and/ or within a Section 106 planning obligation or Deed of Obligation, as part of any Development Consent Order approval.</p>	<p>relation to construction vehicle movements associated with the construction of the Proposed Development and operational reassignment of vehicle movements from the existing Cambridge WWTP to the proposed WWTP.</p> <p>The Applicant also refers to the Access and Traffic Regulation Order Plans (App Doc Ref 4.7) [APP-021] which show proposed construction and operational access and egress points.</p> <p>In relation to the permanent access proposals the Applicant refers to Design Plans - Highways and Site Access (App Doc Ref 4.11) [APP-025].</p> <p>Section 4, General Requirements, Health and Safety of ES Chapter 2 Appendix 2.1 - Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [APP-068], provides information in relation to health and safety matters, in particular to the following.</p> <p>Para 4.1.5: the Applicant will ensure that arrangements are in place for the discharge of its duties under the Construction (Design and Management) Regulations (CDM Regulations).</p> <p>Para 4.1.6: as required under the CDM Regulations information about or affecting the site collected prior to the commencement of construction. This will involve approaching the relevant authorities and stakeholders, which would include EEAST, the inclusion of which to</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>these groups has been discussed in August 2023 and October 2023 working group meetings. The Principal Contractor(s) will be responsible for the production and implementation of the Project Health and Safety Plan in accordance with CDM Regulations. This will set out how health and safety matters on the site are to be managed and how risks are to be identified and managed in accordance with current best practice and legal requirements. The Health and Safety Plan will focus on the health and safety of construction workers; however, the Principal Contractor(s) will also be responsible for ensuring the health and safety of any visitors to the site and of the general public in the vicinity of construction activities.</p> <p>Para 4.21: requires the Principal Contractor(s) appointed by the Applicant to accredited to British Standard (BS) EN ISO 14001: Environmental Management and ISO 45001: Health and Safety Management Standards.</p> <p>Section 4, CEMP, of ES Chapter 2 Appendix 2.1 - Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [APP-068], requires that the Contractor prepares detailed plans including the following.</p> <p>Para 4.4.1: as set out under section 2, the Principal Contractor(s) appointed by the Applicant will be required to produce a Construction Environmental Management Plan (CEMP) before works associated</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>with each part of the Proposed Development commence.</p> <p>The management plans which will be prepared are as listed below. Outline plans were submitted as part of the Application and will be secured through the Requirements in the dDCO (App Doc Ref 2.1) [AS-139], including the following.</p> <ul style="list-style-type: none"> ○ Community Liaison Plan (See section 2)*; ○ Pollution Incident Control Plan (See section 4.6)* ○ Emergency Preparedness Plan (See section 4.6)* ○ Construction Traffic Management Plan (See section 7.6)* ○ Construction Workers Travel Plan (see section 7.6)* <p><i>* The above documents with asterisks are documents that will either be produced or updated prior to the commencement of the enabling phase.</i> <i>** Only to be produced where deemed necessary.</i></p> <p>These will be in effect to cover the construction period for Proposed Development. Detailed plans will be prepared prior to the start of construction.</p> <p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] secures the provision of a management plans (including but not limited to the CTMP, CLP, CWTP, and Emergency Preparedness Plan) for each phase of the development, to be</p>

Reference	Relevant Representation Comment	Applicant's Response
<p>Population Increase, Health & Wellbeing, Page 8</p>	<p>It is evident that during the construction phase a significant number of construction workers are required to implement the demolition and construction stages of the Project. Information to determine the nature of the construction workforce, their home origin, health status, clinical dependencies, location of any temporary accommodation, which are factors likely to impact on EEAST's operational capacity, efficiency and resources, including its logistical response with healthcare partners, is currently incomplete and insufficiently assessed within the EIA and associated DCO documentation.</p>	<p>submitted and approved by the local planning authority, alongside the CEMP for each phase.</p> <p>The details in relation to the nature of the construction workforce, their home origin, health status, clinical dependencies, location of any temporary accommodation would not be available at this stage of the project programme.</p> <p>The Applicant will continue to coordinate with EEAST via the Emergency Services Technical Working Group in relation to the details relating to the emerging workforce. These details would be communicated through a forum as would be defined within the detailed Community Liaison Plan. Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] secures the provision of further plans including the CLP for each phase of the development, to be submitted and approved alongside the CEMP for such phase.</p> <p>The Applicant confirms that they have continued to engage with EEAST in relation to ongoing coordination and that there would be a specific sub-group set up in relation to emergency services matters. This arrangement will be recorded in the SoCG.</p> <p>The Applicant confirms that there is no demolition related to the Proposed Development and refers to paragraph 6.2.6 in ES Chapter 2 – Project Description (App Doc Ref 5.2.2) [APP-034] which states that 'Consent is not sought under the Development Consent Order for the subsequent demolition</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>or redevelopment of the Cowley Road site..' and Figure 1.1 which shows the relationship between the Proposed Development, the scope of the proposed DCO and the future demolition and redevelopment of the site at Cowley Road (the existing Cambridge WWTP).</p>
<p>Transport, Community Safety, Health & Wellbeing Working Group, Page 8</p>	<p>In the light of the above, EEAST recommend that appropriate Terms of Reference, Membership and a Communications Strategy for a Transport, Community Safety Health and Wellbeing Working Group is established, potentially in advance of the Examination.</p> <p>This would help to inform and assist the management of relevant aspects of the Project requiring a coordinated response from 'health and blue light partners', incorporating representatives from EEAST, Cambridgeshire & Peterborough Integrated Care System (ICS) Cambridgeshire Constabulary and Cambridgeshire Fire & Rescue Service.</p>	<p>The Applicant notes the comments and has set up an Emergency Services Technical Working Group to review and consider concerns from all the relevant emergency services.</p> <p>Where concerns are addressed or, where additions can be incorporated into Application documents, this will be documented in the combined SoCG for the Emergency Services.</p>

Table 3-10: National Highways (RR-016)

Reference	Relevant Representation Comment	Applicant's Response
	<p>The book of reference as submitted by the Applicant identifies 43 plots of land owned by or occupied by National Highways ("Plots") in respect of which compulsory acquisition powers to acquire new rights are sought. The compulsory acquisition powers sought are described in the book of reference as being the creation</p>	<p>The Applicant included protective provisions for the benefit of National Highways within the draft Order which had been the subject of discussion for a number of months and had almost been agreed. The Applicant continues to engage with National Highways on the content of these provisions. National Highways has now advised that they require the</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>and compulsory acquisition of new rights over land and the temporary possession of land (“Compulsory Powers”). To safeguard National Highways’ interests and the safety and integrity of the SRN, National Highways objects to the inclusion of the Plots in the Order and to Compulsory Powers being granted in respect of them. The Plots constitute land acquired by National Highways for the purpose of its statutory undertaking and, accordingly, this representation is made under section 56 and sections 127 and 138 of the Planning Act 2008. National Highways considers that there is no compelling case in the public interest for the Compulsory Powers and that the Secretary of State, in applying section 127 of the Planning Act 2008, cannot conclude that new rights and restrictions over the Plots can be created without serious detriment to National Highways’ undertaking and no other land is available to National Highways to make good the detriment. National Highways also objects to all other compulsory powers in the Order that affect, and may be exercised in relation to, National Highways’ property and interests.</p>	<p>inclusion of their Standard Protective Provisions on the face of the DCO. The Applicant continues to engage with National Highways on the inclusion of appropriate provisions.</p>
	<p>In order for National Highways to be in a position to withdraw its objection, National Highways requires: ? (a) the inclusion of its protective provisions in the Order for its benefit; and (b) agreements with the Applicant that regulate</p> <ul style="list-style-type: none"> • (i) the manner in which rights over the Plots are acquired and the relevant works are carried out including terms which protect National Highways’ statutory undertaking 	<p>The Applicant included protective provisions for the benefit of National Highways within the draft Order which had been the subject of discussion for a number of months and had almost been agreed. The Applicant continues to engage with National Highways on the content of these provisions. National Highways has now advised that they require the inclusion of their Standard Protective Provisions on the face of the DCO. The Applicant continues to engage with National</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>and agreement that compulsory acquisition powers will not be exercised in relation to such land; and</p> <ul style="list-style-type: none"> • (ii) the carrying out of works in the vicinity of the SRN to safeguard National Highways' statutory undertaking. National Highways reserves the right to produce additional grounds of concern if further details of the impact to National Highways' assets become available. • The proposal for a traffic monitoring regime to determine the timing of the phasing of implementation works requires further details in terms of its operation and application. 	<p>Highways on the inclusion of appropriate provisions and the outcome of these discussions will be recorded in the SoCG.</p>
	<p>It is understood that Traffic Management on Junction 34 of the A14 would be required. Arrangements would need to be made with the National Highways' Roadspace Bookings team to ensure there are no conflicts on the network and to ensure the safety of users of the SRN.</p> <ul style="list-style-type: none"> o Construction Traffic Routes on the SRN are not sufficiently understood, and further detail is required in respect of how they will be managed. o In particular, the impact on Junctions 33, 34 and 35 of the A14. o Should the proposed construction works require the temporary closure of eastbound off slip, this can be done for short durations at night-time only. A Temporary Traffic Road Order (TTRO) will be required and consultation with the National Highways' Roadspace Booking team. 	<p>The Applicant notes the comments and continues to engage with National Highways to identify the further information required.</p>
	<p>The proposed development includes a Transfer Tunnel connecting the existing Waste Water Treatment Plant to the south of the A14 to the proposed site to the north.</p> <ul style="list-style-type: none"> o The proposed tunnel has an internal diameter of greater 	<p>The Applicant notes the comments and continues to engage with National Highways to identify the further information required.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>than 2.0 metres, therefore the design of the tunnel will require an Approval in Principle approved by National Highways' Safety Engineering and Standards (SES) Structures and Geotechnical teams.</p> <p>o In addition, as the proposed tunnel is proposed to go under the A14, these works will require Roadspace to be booked and the carriageway levels monitored during the pipe jacking process. This carriageway level monitoring is required to record the heave or settlement that might occur to the carriageway as agreed with the SES Geotechnical team and is normally RAG (Red, Amber and Green) rated. Red indicates the works must stop immediately and the matter discussed with the National Highways Geotechnical Team. CCTV before and after of any National Highways drainage system assets must be recorded and any damage recorded after the pipe jacking works must be rectified to National Highway's satisfaction.</p>	
	<p>The proposal includes enhancements to the A14 overbridge to provide Local Transport Note (LTN) 120 compliant Active Travel cycle path. o The enhancements require alterations to the bridge parapet and would be subject to a Road Safety Audit.</p> <p>o National Highways' have not had sight of the Road Safety Audit, therefore unable to provide comment or support at this stage. National Highways' also wishes to take the opportunity to draw the attention of the Applicant to the National Highways' Protective Provisions, which seek to protect the National Highways network and manage the interface of the project and the SRN.</p>	<p>The Applicant met with National Highways July 2023 which included a discussion on the Road Safety Audit (RSA) with a agreement to provide a copy once Cambridgeshire County Council (CCC) had indicated their acceptance of the document. The Applicant provided the RSA report (App Doc Ref 5.4.19.11) [AS-112] to National Highways on 7th August 2023 and followed up with National Highways in August 2023. The Applicant has received comments from National Highway which it is reviewing and will take forward further discussions with National Highways.</p>

Reference	Relevant Representation Comment	Applicant's Response
	During the consultation process identifying a suitable access for the proposed Waste Water Treatment Plant, the applicant proposed option 3 which consisted of a access directly off the A14. This option was not acceptable to National Highways due to safety concerns and non-policy compliance (DfT Circular 01/2022, paragraph 20). National Highways supports the removal of this option from consideration.	The Applicant welcomes National Highways' confirmation of support for the removal of proposed access option 3 that consisted of an access directly off the A14.

Table 3-11: Cadent Gas Limited (RR-011)

Reference	Relevant Representation Comment	Applicant's Response
Access	Cadent's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the order limits including should be maintained at all times and access to inspect such apparatus must not be restricted.	The Applicant notes the comments in relation to the need for access to existing apparatus and will take this requirement forward with Cadent.
	The documentation and plans submitted for the above proposed scheme have been reviewed in relation to impacts on Cadent's existing apparatus located within this area, and Cadent has identified that it has low and intermediate pressure mains located within the order limits	The Applicant is aware of the presence of the low and intermediate pressure gas main and has incorporated the information into the design of the Proposed Development.
Protective Provisions	Cadent has interests identified within plots 001a, 001b, 001c, 011a, 036a, 036b, 036c, 036d, 036e, 036f, 037a, 037b, 037c and 037d, therefore it will require adequate protective provisions to be included within the DCO to ensure that its apparatus and land interests are adequately protected and to include compliance with relevant safety standards.	The Applicant notes the comments in relation to stated plots and will take forward discussions with Cadent.

Reference	Relevant Representation Comment	Applicant's Response
Protective Provisions	As a responsible statutory undertaker, Cadent's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. Adequate protective provisions for the protection of Cadent's statutory undertaking are therefore required and are currently in discussion between parties.	The Applicant is aware of Cadent's concerns set out in this table and therefore the protective provisions for the benefit of Cadent were included in the draft Order. These provisions have been the subject of discussion between the parties for a number of months. The Applicant is continuing to negotiate the outstanding points with Cadent. The outcome of discussions will be recorded in the Statement of Common Ground.

Table 3-12: Royal Mail (RR-020)

Reference	Relevant Representation Comment	Applicant's Response
	<p>RM does not wish to stop or delay this scheme from being constructed, but does wish to protect its future ability to provide an efficient mail sorting and delivering service. In order to do this, RM requests that:</p> <ol style="list-style-type: none"> 1. the DCO includes specific requirements that during the construction phase RM is notified by Anglian Water Services Limited or its contractors at least one month in advance on any proposed road closures / diversions / alternative access arrangements, hours of working, and on the content of the final CTMP, 2. the final CTMP includes a mechanism to inform major road users (including RM) about works affecting the local highways network (with particular regard to RM's distribution facilities near the DCO application boundary), and 	<p>The Applicant notes the requests made by the Royal Mail within their relevant representation and would like to direct them to the Community Liaison Plan (App Doc Ref 7.8) [AS-132] which outlines the Applicants commitments to stakeholder engagement during the construction of the Proposed Development and includes commitments to the requests made by Royal Mail. The Community Liaison Plan is secured through Requirement 9 of the dDCO (Doc 2.1) [APP-039].</p> <p>The list of Prescribed Consultees for CWWTPRP was identified through stakeholder mapping, with the Royal Mail included on the list. As a Prescribed Consultee, Royal Mail will be part of a two-way dialogue during the construction phase as set out within Section 4 of the Community Liaison Plan (App Doc Ref 7.8) [AS-132]. The approach to the communications is set out in Section 5.1 of the Community Liaison Plan (App Doc Ref 7.8) [AS-132] and includes the following.</p>

Reference	Relevant Representation Comment	Applicant's Response
	3. RM is invited to join any stakeholder traffic management consultation group that is set up during the operational phase.	<p>Informing stakeholders of the progress of the Proposed Development (including maps and plans for local area, timings and duration of works, how and when areas will be reinstated); and</p> <p>Upcoming traffic management measures (including road transport information such as bus stops and details of diversions).</p> <p>The timeframes for communications will be set out within the final Community Liaison Plan as per Section 6 of the Community Liaison Plan (App Doc Ref 7.8) [AS-132]. Timeframes will be a fixed period and will take into account any statutory requirements. The Applicant notes the Royal Mail's request for at least one month and will take this into account in the final Community Liaison Plan.</p>

Table 3-13: Natural England (RR-015)

Reference	Relevant Representation Comment	Applicant's Response
Para 1.1.6	<p>Natural England is broadly supportive of the proposed development of a low carbon waste water treatment facility that will help to mitigate wider climate impacts and make a positive contribution towards enhancing the natural environment and people's access to the countryside and enjoyment of nature.</p> <p>We welcome the proposal to establish new habitats for wildlife, including delivery of a minimum 20% biodiversity net gain and creation of an improved landscape and</p>	<p>The Applicant welcomes Natural England's broad support of the Proposed Development.</p> <p><i>Recreational impacts</i></p> <p>In relation to recreational usage, the Applicant has assessed the impact of recreational users and this is set out in section 4 of the ES Chapter 8: Biodiversity (App Doc Ref 5.4.8) [AS-026].</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>access connectivity. Natural England's main concerns with the project are the effects of the proposed access enhancements on the surrounding countryside, including Stow-cum-Quy Fen SSSI, particularly in combination with Local Plan development, including the North East Cambridge development that this Scheme will enable. This matter requires further consideration through the Environmental Statement and the Landscape, Ecology and Recreational Management Plan (LERMP).</p>	<p>The Applicant does not consider the proposed pathways indicated within the LERMP (App Doc Ref 5.4.8.14) [AS-066] will increase the effects on the Stow-um-Quy Fen area.</p> <p>The Applicant confirms that the North East Cambridge A Biodiversity Assessment¹ (MIKA 2020), Sustainability Appraisal² (2021), Topic Paper: Open Space & Recreation (2021)³ and The Greater Cambridge Green Infrastructure Opportunity Mapping⁴ (LUC, 2021) have been reviewed in relation to understanding how potential biodiversity impacts in relation to recreational pressures associated with the NECAPP have been considered in relation to the development of the APP.</p> <p>The NEC Sustainability Appraisal (2021) identifies potential recreational pressures at Bramblefields Local Nature Reserve but does not include reference to Stow-cum-Quy Fen.</p> <p>The MKA (2020) report identifies that <i>'the development of NEC provides a unique opportunity to create a new biodiversity hotspot at Chesterton Fen which can deliver a suite of priority habitats and species that reflect the local landscape. This feature would also serve as a green gateway on the edge of the city which connects to wider schemes such as the National Trust Wicken Vision and the River Cam green corridor'</i>. The assessment does not go on to</p>

¹ <https://www.greatercambridgeplanning.org/media/1243/ecology-study-a-biodiversity-assessment-2020.pdf>

² <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-11/NECAAPSustainabilityAppraisal2020v22021.pdf>

³ <https://www.greatercambridgeplanning.org/media/1268/open-space-topic-paper.pdf>

⁴ https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-09/GREATE~3_0.PDF

Reference	Relevant Representation Comment	Applicant's Response
		<p>identify any conflict in relation to recreational pressure but does however conclude that development of NEC would offer greater opportunities for public engagement with nature, and the subsequent health and well-being benefits.</p> <p>The Open Space Topic Paper refers to another study investigating assessed Green Infrastructure assets both individually and collectively. The Greater Cambridge Green Infrastructure Opportunity Mapping (LUC, 2021) includes a consideration of Stow cum Quy SSSI as part of Strategic Initiative 4: Enhancement of the eastern fens. In relation to recreational pressures this document states that negative impacts from access and recreational pressure are minimised through habitat buffers and educating visitors.</p> <p>The LERMP (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 successfully 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 the LERMP to formalise how people are already using the land required for the proposed WWTP rather than encouraging intensification of use.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The assessment has not identified significant residual effects on this receptor, however recognising the uncertainty in relation to predicting how people may use this area, the Applicant has included with the LERMP (App Doc Ref 5.4.8.14) [066] the requirement to complete user surveys and the intention to set up an Advisory Group. Through this group matters such as recreational users can continue to be discussed and managed.</p> <p>The Applicant also refers to paragraph 4.1.2 and 4.1.4 within section 4 of the LERMP (App Doc Ref 5.4.8.14) [AS-066] which confirms the intention to set up an Advisory Group. Through this group matters such as recreational users can continue to be discussed and managed.</p> <p>These measures are in alignment with the educational opportunities indicated identified within the Strategic Initiative 4: Enhancement of the eastern fens within The Greater Cambridge Green Infrastructure Opportunity Mapping (LUC, 2021).</p> <p>The Applicant would continue to engage with relevant stakeholders including but not limited to the LPA and Natural England in relation to the development of the detailed LERMP including the terms of reference for the Advisory Group. These can include matters such as recreational pressure management and the detail in relation to educational aspects incorporated into the LERMP. The group terms of reference would form part of the detailed LERMP.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The requirements within the LERMP (App Doc Ref 5.4.8.14) [AS-066] are secured by Schedule 2 of the dDCO (App Doc Ref 2.1) [AS-139] relating to the detailed landscape scheme and LERMP which will be approved by Natural England and the Local Planning Authority.</p> <p>Requirement 11 of the dDCO (App Doc Ref 2.1) [AS-139] fulfils this requirement and requires that the detailed plan accords with the LERMP (App Doc Ref 5.4.8.14) [AS-066].</p>
<p>Para 1.1.8</p>	<p>AWSL shared a draft template Statement of Common Ground (SoCG) (Version 1) with Natural England in May 2023. The SoCG represents the position between Anglian Water and Natural England at May 2023 (covering the pre-application stage of the process).</p> <p>At this stage we have not provided substantive comments on the draft SoCG; however, we will update this in due course to reflect our comments in these representations. We understand that the SoCG will continue to be reviewed and progressed through acceptance and examination stages as well as any actions arising from the Issue Specific Hearings on the draft DCO.</p> <p>A Statement of Commonality on specific points between SoCG's will be updated and submitted to the Examining Panel during the examination to reflect additional agreement achieved.</p>	<p>The Applicant continues to engage with Natural England in relation to development of the SoCG. The existing document submitted at Deadline 1 has been updated to reflect the position in relation to the Ghost Licence applications submitted to Natural England in relation to the Protected species.</p>
<p>Part II, Table 1, Issue 1</p>	<p>Issues raised previously by Natural England have been addressed through the submission HRA Report and the updated HRA Screening Report provided by the Applicant on 14/7/2023. No actions are required, subject to</p>	<p>The Applicant confirms the productive approach to completion of the HRA Screening (App Doc Ref 5.4.8.15) [AS-068] and (App Doc Ref 5.4.8.16) HRA Report [AS-070] and facilitation of this process by Natural England.</p>

Reference	Relevant Representation Comment	Applicant's Response
	confirmation that the Environment Agency is in agreement with the HRA conclusions.	The Applicant confirms the intention to engage with both Natural England and the Environment Agency which will include details regarding the HRA and record the outcome of discussions in the SoCG.
Part II, Table 1, Issue 2	Details of a post-construction monitoring programme and adaptive landscape management approach, progressed through a wider partnership arrangement, to mitigate recreational pressure impacts on Stow-cum-Quy Fen SSSI, will need to be provided and secured through the LERMP.	<p>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.</p> <p>In relation to the Bridleway/Permissive Paths the Applicant will ensure as part of the LERMP that there will be adequate signage to ensure appropriate use of the Paths/Bridleway and behaviour to limit any impact</p> <p>Long-term application of the LERMP (Appendix 8.14) (App Doc Ref 5.4.8.14) [AS-066] which requires that the operator to prepare a detailed management and maintenance plan (secured through requirements 11), based on the LERMP which will be agreed with key stakeholders. In relation to users, section 4 of LERMP (Appendix 8.14) (App Doc Ref 5.4.8.14) [AS-066] 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.</p> <p>The Applicant also refers to paragraphs 4.1.2 and 4.1.4 within section 4 of the LERMP (Appendix 8.14) (App Doc Ref 5.4.8.14) [AS-066] which confirms the intention to set up an Advisory</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Group. Through this group matters such as recreational users can continue to be discussed and managed.</p> <p>The Applicant would continue to engage with relevant stakeholders including but not limited to the LPA and Natural England in relation to the development of the detailed LERMP including the terms of reference for the Advisory Group. These can include matters such as recreational pressure management and the detail in relation to educational aspects incorporated into the LERMP. The group terms of reference would form part of the detailed LERMP.</p> <p>The requirements within the LERMP Appendix 8.14) (App Doc Ref 5.4.8.14) [AS-066] are secured by Schedule 2 of the Draft DCO relating to the detailed landscape scheme and LERMP which will be approved by Natural England and the Local Planning Authority. Requirement 11 of the dDCO (App Doc Ref 2.1) [AS-139] fulfils this requirement and requires that the detailed plan accords with the LERMP (Appendix 8.14) (App Doc Ref 5.4.8.14) [AS-066].</p>
<p>Part II, Table 1, Issue 2</p>	<p>Monitoring of the water quality of the Black Ditch, which is hydrologically connected to Stow-cum-Quy Fen SSSI, should be undertaken in addition to the water level monitoring referenced in the CoCP Part B. This should be undertaken throughout the operation of the plant as well as during construction.</p>	<p>Water quality monitoring prior to, during and following construction is recommended at Black Ditch in the Environmental Statement Chapter 20: Water Resources (paragraphs 4.1.281 and also 4.2.145) (App 5.2.20) [AS-040]. The scope and duration of monitoring will be agreed with all relevant stakeholders before any works, which could potentially impact the ditch, commence.</p> <p>The Applicant has prepared an Outline Water Quality Monitoring Plan (App Doc Ref 5.4.20.13) to cover the proposals for water</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>quality monitoring. This is agreed in principle with the Environment Agency and an outline plan included as part of the Applicant's submission at Deadline 1.</p> <p>The ES Chapter 20: Water resources (App Doc Ref 5.2.20) [AS-040] resources has assessed the impacts to Stow-cum-Quy Fen SSSI, which is about 1.5km north-east of the proposed WWTP.</p> <p>A contaminant transport model (ConSim) (App Doc Ref 5.4.20.8) [APP-158] was used to better understand the risks from the proposed WWTP to water quality in Black Ditch and the nearby environmental receptors, Stow-cum-Quy Fen SSSI and Allicky Farm Pond CWS (App Doc Ref 5.4.20.8 Contaminant Transport Note) [APP-158].</p> <p>Based on the findings of the model, the risk of an impact on groundwater resources in the Allicky Farm Pond CWS and Stow-cum-Quy Fen SSSI are predicted to be negligible.</p>
<p>Part II, Table 1, Issue 2</p>	<p>Submission of a more detailed monitoring and mitigation strategy and detailed CEMP, prior to DCO approval. This should include the requirement to act upon any findings of the water quality and water level monitoring within the River Cam, Stow-cum-Quy SSSI and Black Ditch, throughout the construction and operation phases of the project.</p>	<p>The scope and duration of monitoring will be agreed with all relevant stakeholders before any works commence.</p> <p>The Applicant has prepared an Outline Water Monitoring Plan to cover the proposals for water quality monitoring. This has been provided as part of the Applicant's submission at Deadline 1. This approach has been agreed with Natural England in recent meetings.</p> <p>The overarching monitoring activities are represented within an Outline Water Quality Monitoring Plan (App Doc Ref 5.4.20.13)</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>included as part of the Applicant's submission at Deadline 1. Requirement 22 of the dDCO (App Doc Ref 2.1) [AS-139] requires the preparation of a detailed operational monitoring plan to be agreed prior to the start of construction and operation.</p>
<p>Part II, Table 1, Issue 2</p>	<p>We wish to see operational phase groundwater quality monitoring for the wider scheme so that any impacts to designated sites, such as Stow-cum-Quy Fen SSSI, can be identified and appropriate mitigation measures implemented.</p>	<p>The scope and duration of monitoring for the operational phase will be agreed with all relevant stakeholders before any works commence.</p> <p>The Applicant has discussed with specifications (location, parameters, monitoring frequency and duration) for the monitoring of surface and groundwater quality. An approach has been discussed and agreed with the Environment Agency and the Outline Water Monitoring Plan (App Doc Ref 5.4.20.13) is included as part of the Applicant's submission at Deadline 1.</p> <p>The overarching monitoring activities are represented within the Outline Water Quality Monitoring Plan (App Doc Ref 5.4.20.13) which has been agreed in principle with the Environment Agency. The final version of that plan, following approval from the Environment Agency, will be submitted at Deadline 2.</p>
<p>Part II, Table 1, Issue 2</p>	<p>Wilbraham Fen SSSI should be included in the groundwater monitoring and mitigation strategy.</p>	<p>The Applicant has continued to engage with Natural England in relation to potential impacts to designated sites through the Biodiversity Technical Working Group.</p> <p>Further information has been circulated (August and September 2023) in relation to water levels including at Wilbraham Fen SSSI. This has included collecting more recent publicly available data on water levels to indicate natural fluctuations. The predicted change in water levels in this location as a result of dewatering activities</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>required for construction is in the order of 1mm. It is not considered that there are any suitable monitoring approaches that would reasonably detect this level of change.</p> <p>In discussions on the Outline Water Quality Monitoring Plan (App Doc Ref 5.4.20.13) it has been agreed with the Environment Agency that Wilbraham Fen SSSI water levels do not need to be monitored.</p> <p>The overarching monitoring activities are represented within a draft Outline Water Quality Management Plan which has been agreed in principle with the Environment Agency, and forms parts of the Applicant's submission at Deadline 1. The final version of the plan, following approval from the Environment Agency, will be submitted at Deadline 2. Requirement 22 of the dDCO (App Doc Ref 2.1) [AS-139] requires the preparation of a detailed monitoring plan to be agreed prior to the start of construction and operation.</p>
<p>Part II, Table 1, Issue 2</p>	<p>Clarification required on impacts to downstream ecological receptors, including the Cam Washes SSSI, associated with flood level increases.</p>	<p>The Applicant confirmed in hydrology-focused discussion with Natural England on 22 August 2023 (as recorded in the SoCG) that this comment relates to the 22mm increase in flood level for the 1 in 2 year event, as provided in the fluvial flood model report modelling included in Appendix 20.5 (Appendix A, Table A.1) of the ES Appendix 20.5 - Fluvial Model Report (App Doc Ref 5.4.20.5) [AS-113]. This is referenced also in Appendix 20.1 Flood Risk Assessment ES Chapter 20 Appendix 20.1 Flood Risk Assessment (App Doc Ref 5.4.20.1) [APP-151].</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Within the fluvial flood model of Appendix 20.5 (App Doc Ref 5.4.20.5) [AS-113], Figure B.1 of Appendix B shows the 1 in 2 year flood extents. This shows flooding to be contained within channel for both existing and proposed outfall. Receptors within the flood plain would not be impacted.</p> <p>As the flood levels are maintained in-channel in the 1 in 2 year event, receptors within the flood plain, including Cam Washes SSSI would not be impacted by the modelled 22mm increase in flood level and therefore no mitigation is required.</p> <p>The Applicant however notes that since the initial modelling the Environment Agency have issued a revised Cam model. The Applicant has agreed to repeat the fluvial modelling using the updated model and that the assessment findings would be reviewed once this exercise has been completed.</p> <p>Any agreements and discussions in relation to the updated modelling exercise will be documented within the SOCG.</p>
Part II, Table 1, Issue 2	Confirmation should be provided that the replacement WWTP will not place additional demand on highly stressed water resources.	The Applicant confirms that Table 2.20 of Chapter 2 of the ES Chapter 2 Project Description includes information in relation to estimated water demand (App Doc Ref 5.2.2) [APP-034]. The estimated water consumption (m ³ /day). Although the table presents water consumption throughout construction, the existing Cambridge 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.

Reference	Relevant Representation Comment	Applicant's Response
		<p>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 totaling more than 200l/s.</p> <p>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.</p> <p>For the existing WWTP to meet the demands of flow and treatment of the proposed WWTP, it is likely that the current water usage will increase due to the increased polymer make up required for an additional tertiary solids removal facility being required.</p>
Part II, Table 1, Issue 3	Natural England has provided LONIs for water vole and bats but require amendments to the method statements before the licence applications are formally submitted.	The Applicant welcomes the comments from Natural England in relation to draft licence content. Each licence will be updated to account for comments prior to the formal licence application. The Applicant continues to engage with Natural England in particular in relation to various licences. The Applicant confirms that it has reached broad agreement with Natural England in relation to the licences which is reflected in license specific LONI which are annexed to the statement of Common Ground with Natural England.
Part II, Table 1, Issue 3	Natural England is in the process of reviewing the draft badger licence application and will issue a LONI once outstanding matters, if any, have been addressed.	The Applicant acknowledges the comment and confirms that the amended draft Badger licence application (App Doc Ref 5.4.8.21)[APP-106] has now been reviewed by Natural England and a LONI is awaited.

Reference	Relevant Representation Comment	Applicant's Response
<p>Part II, Table 1, Issue 3</p>	<p>Species mitigation and management for the entire scheme, including the tunnel, pipeline and final effluent outfall elements, should be set out in the LERMP.</p>	<p>The Applicant acknowledges that the LERMP (Appendix 8.14) (App Doc Ref 5.4.8.14) [AS-066] relates to the landscape masterplan as defined for the proposed WWTP and discussed within the Technical Working Groups with the stakeholders. Species management and mitigation for the entire scheme is set out in the Mitigation Tracker (App Doc Ref 5.4.2.6).</p> <p>For the area of the Waterbeach Pipelines, Shafts 4 and 5, the compound areas, and the Final Effluent Outfall, and the land required for the construction of the Final Effluent and Storm Pipelines between the Final Effluent Outfall and Horningsea Road, the land will be reinstated in accordance with the requirements of the CoCP Part A [APP-068] and B [APP-069], including the following.</p> <p>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.</p> <p>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</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>In relation to habitats affected by the Final Effluent Outfall within the Works Plan 32 the following measures will apply.</p> <p>Installation of the outfall to minimise the extent of permanent loss of riverbank</p> <p>Installation of the river protection extents to include embedded design features to reinstate riparian reedbed habitat</p> <p>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</p> <p>Translocation of reedbed to be incorporated into the created ditch habitats within area of Works Plan 39</p> <p>Pre works checks and translocation of important botanical species</p> <p>These general applicable measures in the CoCP Part A would also apply</p> <p>In relation to works to the ditch parallel with the river Cam that affect water vole habitat, the following applies.</p> <p>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 (5.4.8.22 ES Volume 4 Appendix 8.22 Water Vole Natural England Ghost Licence Method Statement (App Doc Ref 5.4.8.22) [APP-107]</p> <p>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.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>For areas outside of the landscape masterplan the mitigation and management activities are secured as follows.</p> <p>Management and monitoring of the Final Effluent Outfall area including Works Plan 39 as required for habitat compensation in relation to the Works Plan 32 area including long term management and monitoring is secured by Requirement 10 of the dDCO (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.</p> <p>Management and monitoring of compensation habitat for water vole in accordance with the licence</p> <p>Monitoring of reinstated hedgerows as required by Section 7.2 of the CoCP Part A [APP-068] which requires that reinstatement planting will be undertaken in the first available planting season following construction and that 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. Monitoring of reinstated land and soils as required by section 5.5 Aftercare of the outline Soil Management Plan (App Doc Ref 5.4.6.3) [AS-060]</p> <p>Table 7-1 within the BNG Assessment Report (App Doc Ref 5.4.8.13) [AS-163] summarises the future monitoring mechanisms</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>to implement and monitor created and reinstated habitats in relation to BNG commitments.</p> <p>The Applicant is satisfied that Requirements 7, 8, 9, 10, 11, & 22 of the dDCO (App Doc Ref 2.1) [AS-139] adequately secure mitigation and management of all receptors identified within the ES Chapter 8 Biodiversity (App Doc Ref 5.2.2) [AS-026].</p>
<p>Part II, Table 1, Issue 3</p>	<p>Confirmation should be provided that species mitigation, including for water voles, will be managed for the operational duration of the project. This should be secured through the LERMP</p>	<p>The Applicant provides the following information species by species.</p> <p><u>Water voles</u> Measures secured by the water vole licence including ditch creation. A draft licence is provided as Natural England Ghost Licence Method Statement - Water vole (App Doc Ref 5.4.8.22)[APP-107]. The Applicant welcomes the response received from Natural England in relation to the draft licence details and will continue to engage with NE in relation to the details within the licence to account for their feedback.</p> <p>The dDCO (App Doc Ref 2.1) [AS-139] includes requirement 10 for an outfall management plan to be in place in operation. This will include long term management and monitoring of the ditches created within Works Plan 39.</p> <p>The LERMP (Appendix 8.14) (App Doc Ref 5.4.8.14) [AS-066] therefore it does not need to duplicate details within the licence or outfall management plan.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p><u>Badger</u> Measures for the mitigation of impacts to badger are secured by licence a draft of which is included within the Application within Natural England Ghost Licence Method Statement - Badgers – Confidential (App Doc Ref 5.4.8.21) [APP-106]. The Applicant welcomes the response received from Natural England in relation to the draft licence details and will continue to engage with Natural England in relation to the details within the final licence to account for their feedback.</p> <p><u>Bats</u> Measures for the mitigation of impacts to bats are secured by licence a draft of which is included within the Application within Natural England Ghost Licence Method Statement – Bats (App Doc Ref 5.4.8.20) [APP-105]. The Applicant welcomes the response from Natural England in relation to the draft licence details and will continue to engage with Natural England in relation to the details within the final licence to account for their feedback.</p> <p><u>Reptiles</u> Th Applicant refers to section 7.2 of the CoCP Part A (App Doc Ref 5.4.2.1) [APP-068] which requires that a Reptile Mitigation Strategy will be produced by the contractor prior to works commencing on site. It is proposed that the impact upon reptiles be mitigated during the construction period through a combination of reptile fencing (around the proposed WWTP), sensitive vegetation clearance and management including hard searches as appropriate, and local translocation.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-039] secures the provision of a construction environment management plan for each phase of the development, to be submitted and approved for such phase. This would include the Reptile Management Plan.</p> <p>Requirement 8 of the dDCO (App Doc Ref 2.1) [AS-039] secures compliance with the CoCP.</p>
<p>Part II, Table 1, Issue 4</p>	<p>We advise that a copy of the BNG Metric calculation should be provided, in addition to the BNG Assessment Report. Natural England defer to the Local Planning Authority, as the responsible body for Biodiversity Net Gain, for any further comment.</p>	<p>The Applicant confirms that an updated the metric calculation will be included as part of the submission made under Requirement 11 within the dDCO [AS-039]. The Applicant will continue to engage with both Natural England And the LPA in relation to the application of the metric.</p>
<p>Part II, Table 1, Issue 4</p>	<p>Natural England would like to have early sight of the proposals that indicate how 20% BNG river units will be achieved.</p>	<p>The Applicant confirms that an updated the metric calculation will be included as part of the submission made under Requirement 11 within the dDCO (App Doc Ref 2.1) [AS-039]. The Applicant also continues to engage with both Natural England and the LPA in relation to biodiversity matters. Through the technical working groups the Applicant has continued to provide updates on the status of proposals in relation to river units and the Applicant confirms its intention to maintain this engagement and record the outcome of discussions in the Statement of Common Ground.</p>
<p>Part II, Table 1, Issue 5</p>	<p>A detailed ALC survey for the full Study Area should be presented in the ES and the Applicant should provide simple area breakdowns in a single table for each of the individual components. This is particularly important given the characteristic peat soils within the Waterbeach Pipeline route.</p>	<p>The approach to ALC survey is in alignment with the scoping approach defined within the Scoping Report (App Doc Ref 5.4.4.2) [APP-080] and Scoping Opinion (App Doc Ref 5.4.4.3) [APP-079]. For pipeline routes the potential impacts are associated with the construction stage and are relatively short. The CoCP Part A (App Doc Ref 5.4.2.1) [APP-068] requires that the Contractor prepares detailed plans including a detailed soils management plan.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The CoCP Part A (App Doc Ref 5.4.2.1) [APP-068] section 7.4 Land Quality, soil management, paragraphs 7.4.30 – 7.4.35 specifies required measure in relation to soil management. In particular paragraph 7.4.32 which states 'Prior to construction, specific measures to protect soils will be set out in a detailed Soil Management Plan (SMP), based upon the Outline Soil Management Plan (Appendix 6.3) (App Doc Ref 5.4.6.3) [APP-083] and if required supplemented, by additional survey data'.</p> <p>The outline SMP (App Doc Ref 5.4.6.3) [APP-083] specifically notes that for areas outside the land required for the proposed WWTP 'the soil management measures specified in Section 5 are applied provided that a soil specialist is present on-site to monitor key soil management stages, or that a soil specialist has delivered appropriate training to the Contractor prior to the commencement of the construction [para 1.1.4]'</p> <p>The outline SMP (App Doc Ref 5.4.6.3) [APP-083], Section 5.3. Soil reinstatement and reuse, para 5.4.2 states that the main objective for the reinstatement of agricultural land is to restore the land to its original (pre-development) soil quality, as determined by ALC grade obtained during the pre-construction survey.</p> <p>Therefore, land temporarily required for the Proposed Development for which ALC was not completed would be subject to pre-construction surveys with detailed management measures applied taking into account the findings of preconstruction surveys.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The ES Chapter 6 (App Doc Ref 5.2.6) [AS-024], Table 5-1: Summary of effects to agricultural land, soil resources and farm business, includes a breakdown of soils types lost.</p> <p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] secures the provision of a soil management plan for each phase of the development, to be submitted and approved alongside the CEMP for such phase. These will accord with the requirements of the outline SMP. The CEMP and appended detailed plan would be submitted to and approved by the local planning authority. Through this approval process, the Applicant would agree the details of pre-construction surveys with detailed management measures. The Applicant therefore considers that Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] sufficiently addresses this comment.</p>
<p>Part II, Table 1, Issue 5</p>	<p>The LERMP should show proposed soil profiles, and a soil balance should be provided to demonstrate that the full soil resource can be re-used onsite. This should be split by soil type and proposed end-use.</p>	<p>The soil volumes per field and per soil type in the land required for the proposed WWTP/Landscape Masterplan for each soil horizon (topsoil, upper subsoil, lower subsoil) are reported in Table 4-2 of the of the Outline Soil Management Plan (SMP) (App Doc Ref 5.4.6.3) [APP-060] and ALC report (App Doc Ref 5.4.6.2) [AS-059]. In situ soil horizons are 270-280mm deep for topsoil, 210-250mm deep for upper subsoil and 240-480mm deep for lower subsoil depending on location.</p> <p>The detailed specification of soil profiles and planting within the LERMP Appendix 8.14) (App Doc Ref 5.4.8.14) [AS-066] have not yet been detailed. Requirement 7, Detailed Design, and Requirement 11, LERMP within the dDCO (App Doc Ref 2.1) [AS-039] require details to be submitted to and approved by the</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>relevant local planning authority. Collectively these would include further detail on the design of the earth bank and specifications in relation to planting and soils.</p> <p>This is secured by the following. Schedule 2, Requirement 11 of the dDCO (App Doc Ref 2.1) [AS-039] which requires a detailed landscape ecological and recreational management plan (detailed LERMP) has been submitted to and approved by the relevant planning authority, and Schedule 2, Requirement 7 of the dDCO (App Doc Ref 2.1) [AS-039] which requires a detailed design information is submitted to and approved by the relevant planning authority.</p>
<p>Part II, Table 1, Issue 5</p>	<p>As indicated in section 2 of this table, we wish to see a robust and strategic approach to assessing, monitoring, mitigating and managing the potentially negative effects of the proposed access enhancements through the ES and the LERMP. This should be considered in the context of the wider Cambridge Nature Network and highly sensitive sites such as Stow-cum-Quy Fen SSSI.</p>	<p>The Applicant recognises that understanding potential changes in use patterns will help inform management activities in consultation with stakeholders.</p> <p>The Applicant refers to the LERMP Appendix 8.14, App Doc Ref 5.4.8.14) [AS-066] which 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 the LERMP Appendix 8.14) (App Doc Ref 5.4.8.14) [AS-066] to formalise how people are already using the land required</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>for the proposed WWTP rather than encouraging intensification of use.</p> <p>The assessment has not identified significant residual effects on Stow-cum-Quy Fen SSSI however the following are proposed.</p> <p>In relation to the Bridleway the Applicant will ensure as part of the LERMP that there will be adequate signage to ensure appropriate use of the Permissive Paths/Bridleways and behaviour to limit any impact.</p> <p>Long-term application of the LERMP (Appendix 8.14) (App Doc Ref 5.4.8.14) [AS-066] which requires that the operator prepares a detailed management and maintenance plan (secured through requirement 11), based on the LERMP which will be agreed with key stakeholders. In relation to understanding usage, 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.</p> <p>The Applicant also refers to paragraph 4.1.2 and 4.1.4 within section 4 of the LERMP (App Doc Ref 5.4.8.14) [AS-066] which confirms the intention to set up an Advisory Group. Through this group matters such as recreational users, the Wider Nature Network and connected habitats can continue to be discussed and managed.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The Applicant would continue to engage with relevant stakeholders including but not limited to the LPA 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. Agreements reached in relation to the user group members can be recorded within the relevant SOCG.</p>
<p>Part II, Table 1, Issue 5</p>	<p>In addition to comments in section 3 of this table, our advice is that ecological mitigation, enhancement (including BNG) and management for the entire scheme should be set out in the LERMP</p>	<p>The Applicant acknowledges that the LERMP (Appendix 8.14) (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 including the LPA.</p> <p>For areas of the Waterbeach Pipelines, Shafts 4 and 5, compound areas (the Final Effluent Outfall), and the land required for the construction of the Final Effluent and Storm Pipelines between the Final Effluent Outfall and Horningsea Road, the land will be reinstated in accordance with the requirements of the CoCP Part A [APP-068] and B [APP-069], including the following.</p> <p>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.</p> <p>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</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>would be under the supervision of a suitably experienced ecologist.</p> <p>In relation to habitats affected by the Final Effluent Outfall within the area of Works Plan 32 the following measures will apply.</p> <p>Installation of the outfall to minimise the extent of permanent loss of riverbank</p> <p>Installation of the river protection extents to include embedded design features to reinstate riparian reedbed habitat</p> <p>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</p> <p>Translocation of reedbed to be incorporated into the created ditch habitats within the area of Works Plan 39</p> <p>Pre works checks and translocation of important botanical species</p> <p>These general applicable measures in the CoCP Part A would also apply</p> <p>In relation to works to the ditch parallel to the river Cam that affect water vole habitat, the following would apply.</p> <p>Creation of 84m of habitat within the area of Works Plan 39 in advance of the start of construction as set out within draft water vole licence application ES Volume 4 Appendix 8.22 Water Vole Natural England Ghost Licence Method Statement (App Doc Ref 5.4.8.22) [APP-107]</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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.</p> <p>For areas outside of the landscape masterplan the mitigation and management activities are secured as follows.</p> <p>Management and monitoring of the Final Effluent Outfall area including the area of Works Plan 39 as required for 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.</p> <p>Management and monitoring of compensation habitat for water vole in accordance with the licence</p> <p>Monitoring of reinstated hedgerows as required by Section 7.2 of the CoCP Part A [APP-068] which requires that reinstatement planting will be undertaken in the first available planting season following construction and that 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.</p> <p>Monitoring of reinstated land and soils as required by section 5.5 Aftercare of the outline Soil Management Plan (App Doc Ref 5.4.6.3) [AS-060]</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Table 7-1 within the BNG Assessment Report (App Doc Ref 5.4.8.13) [AS-065] summarises the future monitoring mechanisms to implement and monitor created and reinstated habitats in relation to BNG commitments.</p> <p>The Applicant is satisfied that Requirements 7, 8, 9, 10, 11, & 22 of the dDCO (App Doc Ref 2.1) [AS-139] adequately secure mitigation and management of all receptors identified within the ES Chapter 8 Biodiversity (App Doc Ref 5.2.2) [AS-026].</p>
<p>Part II, Table 1, Issue 7</p>	<p>Natural England's preference would be to have early sight of the Management and Monitoring Plan for the outfall, the updated LERMP, and proposals for any embedded natural finish, water vole mitigation and habitat enhancements, measures to control invasive species and to indicate how 20% BNG river units will be achieved;</p>	<p>The Applicant refers the LERMP Appendix 8.14) (App Doc Ref 5.4.8.14) [AS-066] which sets out that the landscape masterplan will be delivered during operation through the long- term implementation of the LERMP (Appendix 8.14) (App Doc Ref 5.4.8.14) [AS-066] which requires that the operator to prepare a detailed management and maintenance plan. This plan will be based on the LERMP and will be agreed with key stakeholders (Application Doc Ref 5.4.8.14) [AS-066].</p> <p>This preparation of the detailed management and maintenance plan is secured by Schedule 2, Requirement 11 of the dDCO (App Doc Ref 2.1) [AS-039] which requires that a detailed landscape ecological and recreational management plan (detailed LERMP) has been submitted to and approved by the relevant planning authority.</p> <p>In relation to the Final Effluent Outfall and the Works Plans 32 and 39, the Applicant refers to Requirement 10 of the dDCO (App Doc Ref 2.1) [AS-039] which requires that a detailed outfall</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>management and monitoring plan (detailed OMMP) has been submitted to and approved by the relevant planning authority for both the construction and operational phases of the Proposed Development. The plan shall accord with the requirements of the outline outfall management and monitoring plan.</p> <p>The Applicant confirms that it will however continue to engage with the stakeholder group in relation to the detailed plans.</p>
<p>Part II, Table 1, Issue 7</p>	<p>The project should deliver more strategic enhancements for the local nature recovery network, proportionate to its scale and location within the Cambridge green belt and the Cambridge Nature Network</p>	<p>The land permanently required for the landscape masterplan as set out within the LERMP (App Doc Ref 5.4.8.13) [AS-066] is required to deliver mitigation for effects on landscape, historic environment, biodiversity, water and community.</p> <p>Recognising local policy in respect of BNG the Applicant has elected to apply BNG with a target of 20% gain despite this not currently being a mandatory requirement for NSIP projects. The Applicant has primarily achieved this through making use of the area of land required for the mitigation of effects and including further features and enhancements specifically intended to bring about a gain in biodiversity value.</p> <p>Within the extent of the LERMP there are enhancements as which are described within the document (App Doc Ref 5.4.8.13) [AS-066]. The Applicant has, including through the Technical Working Group, sought to design the landscape masterplan to accord with local conservation aims in particular the Cambridge Nature Network.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The Applicant has acknowledged that for the extent of the order limits that give rise to the need for river unit gain the gain will be through a combination of on and off-site measures. This is set out in the BNG Report Appendix C (App Doc Ref 5.4.8.13) [AS-064].</p> <p>Inclusion of further enhancements which would extend beyond the order limits would be beyond the scope of the Proposed Development.</p>
Part II, Table 1, Issue 7	Stronger commitment for the applicant to engage in a partnership approach with relevant parties, including the developers of housing which this NSIP would enable, to address 2a, 7a and 7d of this table and any other issues that subsequently arise	Requirement 9(2)(a)(i) of the dDCO (App Doc Ref 2.1) [AS-139] provides for the production of a Community Liaison Plan which, amongst other matters, would address 2a, 7a and 7d and allow for engagement with a wide variety of representative groups. It is likely that the developers of the vacated existing Cambridge WWTP site would have their own community engagement arrangements in place as a requirement of any planning permission for the redevelopment of that site.
Para 4.8.6	We ask that representations from the local Wildlife Trust and Local Planning Authority ecologists are taken into account with regard to these aspects, and that representations from the Environment Agency are taken into account for any water-dependant priority habitats and species that might be affected.	The Applicant acknowledges these comments and confirms that there are ongoing discussions with the parties referred to and that matters are managed through the SoCG with each relevant party and the outcome of discussions recorded.
Part III, Table 2	DCO Requirement 7 Detailed Design - Natural England welcome this essential requirement.	The Applicant welcomes the agreement to this Requirement.
Part III, Table 2	DCO Requirement 8 Code of Construction Practice - Natural England welcome this essential requirement.	The Applicant welcomes the agreement to this Requirement.
Part III, Table 2	DCO Requirement 9 Construction Environmental Management Plans - Natural England welcome this essential requirement.	The Applicant welcomes the agreement to this Requirement.

Reference	Relevant Representation Comment	Applicant's Response
Part III, Table 2	DCO Requirement 10 Outfall - Natural England welcome this essential requirement. We advise that requirement 10(1) should also include the requirement for approval by the Environment Agency and Natural England, in addition to the relevant planning authority, or for the relevant planning authority to consult with these bodies prior to approval.	The Applicant is content to include in the dDCO requirement clarification that Natural England and the Environment Agency are to be consulted by the relevant planning authority prior to issuing such approval and has made this change in the dDCO submitted at Deadline 1 (Document 2.1A Rev 1).
Part III, Table 2	DCO Requirement 11 - Landscape, Ecology and Recreation Management Plan - Natural England welcome this essential requirement. We advise that requirement 11(1) should also include the requirement for approval by Natural England, in addition to the relevant planning authority, or for the relevant planning authority to consult with Natural England prior to approval.	The Applicant is content to include in the dDCO requirement clarification that Natural England is to be consulted by the relevant planning authority prior to issuing such approval and has made this change in the dDCO submitted at Deadline 1 (Document 2.1A Rev 1).
Part III, Table 2	DCO Requirement 14 Construction lighting - Natural England welcome this essential requirement.	The Applicant welcomes the agreement to this Requirement.
Part III, Table 2	DCO Requirement 15 Drainage - Natural England welcome this essential requirement.	The Applicant welcomes the agreement to this Requirement.
Part III, Table 2	DCO Requirement 16 Contamination risk - Natural England welcome this essential requirement. We advise that the contamination of water should also be reported, investigated, and remediated if necessary, not just land-based contamination.	The Applicant considers that this concern is dealt with through Requirement 22 – water quality monitoring of the dDCO (App Doc Ref 2.1) [AS-139].
Appendix 1	The land subject to permanent development and landscaping has been subject to a detailed ALC survey. It is acknowledged that the unsurveyed agricultural land is subject to temporary disturbance as a result of pipeline installation. This loss of BMV land can be considered temporary if it is returned to its former agricultural grade	The Applicant confirms that the ALC survey area is in alignment with the scoping approach defined within the Scoping Report (App Doc Ref 5.4.4.2) [APP-080] and Scoping Opinion (App Doc Ref 5.4.4.3) [APP-079]. For pipeline routes the potential impacts are associated with the construction stage and are relatively short in duration. The CoCP Part A [APP-068], section 4. CEMP, requires

Reference	Relevant Representation Comment	Applicant's Response
	<p>following construction. Natural England would advise that for all areas of agricultural land subject to temporary and permanent loss, in which Post-1988 ALC survey information is not available, an ALC survey should be undertaken.</p> <p>The ALC surveys will identify the ALC grade, which can then be used to contribute to the masterplanning, so as to demonstrate the potential impacts on BMV agricultural land were minimised as far as practicable, as per the NPS EN-1, NPPF; and local planning policies.</p> <p>Furthermore, the ALC surveys can provide the necessary soil information to inform the detailed, site specific Soil Management Plan, including identifying the appropriate mitigation measures needed, which can then be reported in the ES.</p> <p>As such, we would expect to see a detailed ALC survey for the full Study Area to be presented in the ES and that the Applicant provide simple area breakdowns in a single table for each of the individual components (including the land associated with construction of the Waterbeach pipeline, final effluent transfer and the areas required for launch and recovering shafts for transfer pipeline installation). For example, total agricultural area impacted temporarily and permanently (split by scheme component and by ALC grade), and total BMV agricultural area permanently and temporarily required for the development.</p>	<p>that the Contractor prepares detailed plans including a detailed soil management plan. The detailed plan will accord with the requirements of the outline Soil Management Plan (App Doc Ref 5.4.6.3) [AS-060].</p> <p>Information on the area of land of different ALC grades disturbed is provided within the ES Chapter 6 (App Doc Ref 5.2.6) [AS-024], Table 5-1, based on the ALC survey and the provisional ALC data. However, the Applicant agrees that it would be helpful to produce a summary table of area breakdowns for each ALC grade according to the nature of the disturbance. This update will be provided at Deadline 1.</p>

Reference	Relevant Representation Comment	Applicant's Response
Appendix 1	<p>The Landscape, Ecological and Recreational Management Plan does not set out the proposed soil profiles for the landscaping and earth bunds, nor does it set out the required soil resource to create the proposed landscaping. A soil balance should be provided to demonstrate that the full soil resource can be re-used on site. This should be split by soil type and proposed end-use.</p>	<p>The soil volumes per field and per soil type in the land required for the proposed WWTP/Landscape Masterplan for each soil horizon (topsoil, upper subsoil, lower subsoil) are reported in Table 4-2 of the Outline Soil Management Plan (SMP) (App Doc Ref 5.4.6.3) [AS-060] and ALC report (App Doc Ref 5.4.6.2) [AS-058]. In situ soil horizons are 270-280mm deep for topsoil, 210-250mm deep for upper subsoil and 240-480mm deep for lower subsoil depending on location.</p> <p>The detailed specification of soil profiles and planting within the LERMP have not yet been detailed. Requirement 7, Detailed Design, and Requirement 11, LERMP within the dDCO (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 details on the design of the earth bank and specifications in relation to planting and soils.</p>
Appendix 1	<p>In order to both retain the long term potential of this land and to safeguard all soil resources as part of the overall sustainability of the whole development, it is important that the soil is able to retain as many of its many important functions and services (ecosystem services) as possible. This can be achieved through careful soil management and appropriate, beneficial soil re-use, with consideration of how adverse impacts on soils and their functions can be avoided or minimised.</p>	<p>The Outline Soil Management Plan (App Doc Ref 5.4.6.3) [AS-060] has been produced based on the surveyed soil types and the Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra, 2009). This outlines the best practice to safeguard soil resources during and after construction.</p>
Appendix 1	<p>Sustainable soil management should aim to minimise risks to the ecosystem services which soils provide, through appropriate site design. Defra has published a Construction Code of Practice for the Sustainable Use of</p>	<p>An Outline Soil Management Plan (SMP) (App Doc Ref 5.4.6.3) [AS-060] has been produced based on the surveyed soil types and the Code of Practice for the Sustainable Use of Soils on Construction</p>

Reference	Relevant Representation Comment	Applicant's Response
	Soils on Construction Sites which may be helpful when setting planning conditions for development sites. It provides advice on the use and protection of soil in construction projects, including the movement and management of soil resources, which we strongly recommend is followed.	Sites (Defra, 2009). This outlines the best practice to safeguard soil resources during and after construction.
Appendix 1	The British Society of Soil Science has published the Guidance Note Benefitting from Soil Management in Development and Construction which sets out measures for the protection of soils within the planning system and the development of individual sites, which we also recommend is followed.	The Outline Soil Management Plan (SMP) (App Doc Ref 5.4.6.3) [AS- 060], includes the relevant information contained in the Guidance Note Benefitting from Soil Management in Development, which was published after the Outline SMP (App Doc Ref 5.4.6.3) [AS-060] was written.
Appendix 1	We advise that if the development proceeds, the developer uses an appropriately experienced soil specialist to advise on, and supervise, soil handling, including identifying when soils are dry enough to be handled and how to make the best use of the different soils on site. All soils should only be handled in a dry and friable condition, and it is expected that soil handling will be confined to the drier summer period to minimise risk of soil damage. Soil handling methods should normally be as specified as in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (including accompanying Toolbox Talks).	<p>The Outline Soil Management Plan (SMP) (App Doc Ref 5.4.6.3) [AS-060] stipulates the need for a soil specialist to oversee soil handling. Particular sections of note are paragraph 4.1.2, section 5.5 and 5.6, Appendix A.2.</p> <p>The Outline Soil Management Plan (SMP) (App Doc Ref 5.4.6.3) Section 5.3 indicates the weather and soil conditions suitable for soil handling.</p> <p>An Outline Soil Management Plan (App Doc Ref 5.4.6.3) has been produced based on the surveyed soil types and the Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra, 2009). This outlines the best practice to safeguard soil resources during and after construction.</p>
Appendix 1	Chapter 6. Agricultural Land and Soils 1 Introduction, Pg 9, bullet 6 - The British Standards pertain to the import or export of soil, and do not apply to site won soil resources.	The Applicant refers to Annex A of the British Standard which provides recommendations for the stripping and handling of topsoil, including information on appropriate weather and soil

Reference	Relevant Representation Comment	Applicant's Response
Appendix 1	Chapter 6. Agricultural Land and Soils 1 Introduction, Pg 9, bullet 7 - The HS2 Environmental Impact method is not the standard approach for determining environmental impacts on agricultural land (Section 2.2.21). The methodology presented in 'A New Perspective on Land and Soil in Environmental Impact Assessment (IEMA 2022)' (as derived from the ICE (2019) EIA Handbook) should be employed, as has been for determining the potential impact on the soil resource (Section 2.2.5)	<p>conditions. The Applicant regards considers this best practice as crucial regardless of whether the soil shall be exported or not.</p> <p>The HS2 methodology is referenced as guidance, and not put forward as a standard. The Applicant notes that the scoping stage and preparation of the Scoping Report (App Doc Ref 5.4.4.2) [APP-080] preceded the publication of the IEMA guidance and so was not referred to as a reference document.</p> <p>The IEMA methodology, is however adopted for the assessment of the loss of soil resources. However, the Applicant notes that the IEMA guidance does not provide a methodology for an impact assessment on farm businesses (although Table 2, 3 and 4 within the guidance may be of some relevant the guidance here only provides 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. The rational for reference to the HS2 approach is that this has been adopted as a previously accepted approach and its wider use would have the benefit of providing parity in assessment between significant schemes. For agricultural land, the IEMA guidance could be adopted, recognising that it takes a different approach to assessment than the HS2 methodology. At the time of assessment, the HS2 methodology was current and well-used, whereas IEMA guidance had only just been published.</p>
Appendix 1	Chapter 6. Agricultural Land and Soils 2.3 Study Area - As stated in the comments provided for the PEIR, the ALC survey was only undertaken on the maximum area of land permanently required for the construction, operation and maintenance of the proposed WWTP and landscape	The Applicant notes that the approach to the ALC survey area is in alignment with the scoping approach defined within the Scoping Report (App Doc Ref 5.4.4.2) [APP-080] and the Scoping Opinion (App Doc Ref 5.4.4.3) [APP-079].

Reference	Relevant Representation Comment	Applicant's Response
	<p>masterplan, however the survey did not extend to the Transfer Zone and the Waterbeach zone. This is made even more important due to the mapped Midelney and Adventurers' 1 soil associations within the Waterbeach Pipeline route, which are characteristic peat soils. A soil survey is necessary to accurately identify the extent and boundary of these peat or peaty soils for the baseline. This would enable the development design to be suitably optimised to minimise the potential impacts on these peat soils, which may be unstable and unsuitable for development</p>	
<p>Appendix 1</p>	<p>Chapter 6. Agricultural Land and Soils Section 4.2.4 - It is inappropriate to determine the sensitivity of the ALC grade based on the local prevalence of BMV. The ALC system is a national system, therefore the significance should be determined in the national context.</p>	<p>The Applicant notes that the scoping stage and preparation of the Scoping Report (App Doc Ref 5.4.4.2) [APP-080] preceded the publication of the IEMA guidance and that the assessment phase applied the HS2 methodology to assess loss of agricultural land which was current and well-used at this time, whereas IEMA guidance had only just been published.</p> <p>The Applicant notes that the IEMA guidance could be adopted, recognising that it takes a different approach to assessment than the HS2 methodology and IEMA methodologies would be as follows: both methods identified significant effects on agricultural land, although the degree of significance differs (moderate significance vs major significance). 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</p>

Reference	Relevant Representation Comment	Applicant's Response													
		<p>methodology would identify a moderate, significant effect. The result being that the IEMA approach would result in one additional significant effect.</p> <p>The difference in assessment between HS2 and IEMA for agricultural land is indicated below.</p>													
		<table border="1"> <thead> <tr> <th data-bbox="1151 560 1339 659">Area of scheme</th> <th data-bbox="1339 560 1489 659">Method</th> <th data-bbox="1489 560 1688 659">Sensitivity</th> <th data-bbox="1688 560 1865 659">Impact magnitude</th> <th data-bbox="1865 560 2051 659">Significance of effect</th> </tr> </thead> </table>	Area of scheme	Method	Sensitivity	Impact magnitude	Significance of effect								
Area of scheme	Method	Sensitivity	Impact magnitude	Significance of effect											
		<table border="1"> <tbody> <tr> <td data-bbox="1151 659 1339 978" rowspan="2"> Temporary loss of agricultural land from waste water transfer tunnel, and treated effluent pipelines, the outfall and habitat creation </td> <td data-bbox="1339 659 1489 978"> HS2 method used in the submitted ES </td> <td data-bbox="1489 659 1688 978"> Low (High prevalence of BMV land within a 2km radius of the Proposed Development) </td> <td data-bbox="1688 659 1865 978"> Medium (57% of land is Grade 2 (18ha) and, considered BMV land.) </td> <td data-bbox="1865 659 2051 978"> Minor, not significant </td> </tr> <tr> <td data-bbox="1339 978 1489 1294"> IEMA method </td> <td data-bbox="1489 978 1688 1294"> Very high (Presence of Grade 2 land) </td> <td data-bbox="1688 978 1865 1294"> Minor (Temporary, reversible loss of one or more soil functions or soil volumes) </td> <td data-bbox="1865 978 2051 1294"> Moderate or large, significant effect </td> </tr> </tbody> </table>	Temporary loss of agricultural land from waste water transfer tunnel, and treated effluent pipelines, the outfall and habitat creation	HS2 method used in the submitted ES	Low (High prevalence of BMV land within a 2km radius of the Proposed Development)	Medium (57% of land is Grade 2 (18ha) and, considered BMV land.)	Minor, not significant	IEMA method	Very high (Presence of Grade 2 land)	Minor (Temporary, reversible loss of one or more soil functions or soil volumes)	Moderate or large, significant effect				
Temporary loss of agricultural land from waste water transfer tunnel, and treated effluent pipelines, the outfall and habitat creation	HS2 method used in the submitted ES	Low (High prevalence of BMV land within a 2km radius of the Proposed Development)		Medium (57% of land is Grade 2 (18ha) and, considered BMV land.)	Minor, not significant										
	IEMA method	Very high (Presence of Grade 2 land)	Minor (Temporary, reversible loss of one or more soil functions or soil volumes)	Moderate or large, significant effect											

Reference	Relevant Representation Comment	Applicant's Response				
		Permanent loss of BMV land due to land required for the proposed WWTP, access road and landscaping proposals	HS2 method used in the submitted ES	Low (High prevalence of BMV land within a 2km radius of the Proposed Development)	High (80% of the land constitutes BMV land)	Moderate, significant effect
			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
Appendix 1	Chapter 6. Agricultural Land and Soils Section 4 / Table 5-1 - Natural England broadly agree with the significance of impact assigned to agricultural land and soils, despite inappropriate EIA methodology for agricultural land take.	<p>The approach to assessment is aligned with the Scoping Report (App Doc Ref 5.4.4.2) [APP-080] and Scoping Opinion (App Doc Ref 5.4.4.3) [APP-079].</p> <p>The HS2 methodology is referenced as guidance, and not put forward as a standard. The Scoping stage preceded the publication of the IEMA guidance. The IEMA methodology, is however adopted for the assessment of the loss of soil resources. However, the IEMA guidance does not provide a methodology for an impact assessment on farm businesses (although Table 2, 3 and 4 within</p>				

Reference	Relevant Representation Comment	Applicant's Response
		<p>the guidance may be of some relevant the guidance here only provides 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.</p> <p>The rational for reference to the HS2 approach is that this has been adopted as a previously accepted approach and its wider use would have the benefit of providing parity in assessment between significant schemes.</p> <p>For agricultural land, the IEMA guidance could be adopted, recognising that it takes a different approach to assessment than the HS2 methodology. The Applicant notes that the scoping stage and preparation of the Scoping Report (App Doc Ref 5.4.4.2) [APP-080] preceded the publication of the IEMA guidance and that the assessment phase applied the HS2 methodology to assess loss of agricultural land which was current and well-used at this time, whereas IEMA guidance had only just been published.</p>
Appendix 1	Chapter 6. Agricultural Land and Soils Section 4 - Natural England welcome the re-use of all soil resource on site, however it is not clear as to the soil balance and the quantities of soil proposed for reuse in the bund and landscaping. There is no consideration regarding the soil handling and mitigation measures potentially required for peaty and peat soils.	The Applicant has amended the outline Soil Management Plan (App Doc Ref 5.4.6.3) [APP-060] to take account of peat and peaty soils in areas of temporary land acquisition. This updated document has been included in the Applicant's submission at Deadline 1.

Reference	Relevant Representation Comment	Applicant's Response
Appendix 1	<p>Appendix 6.1 - Agricultural Land Classification</p> <p>Comments provided in March 2022 on the ALC Survey remain relevant and are repeated below (updated comments as of July 2023 in italics):</p> <p>The ALC survey undertaken was in accordance with the MAFF (1988) Guidelines.</p> <p>Having reviewed the ALC survey approach and methodologies, we have the following concerns:</p> <p>i) It is not clear whether suitably qualified and experienced individuals have undertaken the survey work (Natural England note this has now been provided in the ES Chapter (Chapter 6))</p> <p>ii) The ALC surveys do not cover the whole project area</p> <p>iii) Two soil pits were excavated, however three soil types were identified. A soil pit should be undertaken ideally in each observed soil type to accurately observe soil structure and stone content</p> <p>iv) Details of the structure for each soil type as identified through a soil pit should be included, as currently, there is no pit specific information on the structure shape, size and development.</p> <p>v) Presence/absence of gleying and SPL not presented</p> <p>vi) The stone content for each auger is needed to confirm droughtiness calculations for each point.</p> <p>Table 3: The soil thickness and volumes are presented on a per field basis, with a total soil resource of 902,400 m3. This method does not identify where soil types may vary within fields. Furthermore, this volume is not consistent</p>	<p>i) The outline SMP (App Doc Ref 5.4.6.3) [APP-060] Table 5- 1 indicates that ALC survey was undertaken within the proposed WWTP (Appendix A.1, drawing 409071-MMD-00-XX-GIS-Y-0813) by suitably qualified and experienced Soil Scientists between 22nd and 26th November 2021.</p> <p>ii) The Applicant confirms that the approach to the ALC survey area is in alignment with the scoping approach defined within the Scoping Report (App Doc Ref 5.4.4.2) [APP-080] and Scoping Opinion (App Doc Ref 5.4.4.3) [APP-079].</p> <p>iii) At the time of undertaking the survey, it appeared that two soil types were present, however, when analysing field notes and photographs subsequent to site survey, it was determined that it was better to present three soil types.</p> <p>iv) The ALC report (App Doc Ref 5.3.11) [AS-058] will be updated to include information on soil structure, shape, size and development. These details were not included in the first instance as the approach was to include the most pertinent information without overwhelming the reader with fine details.</p> <p>v) Gleying was included in the table as mottle presence and colour was reported. The SPL can be calculated based on the information in the table.</p> <p>vi) The ALC report (App Doc Ref 5.3.11) [AS-058] shall be updated to include information on stone content. These details were not included in the first instance as the approach was to include the most pertinent information without overwhelming the reader with fine details.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>with the total site-won material volume identified in Table 2-12 (Chapter 6), which states 167,000 m3 of soil would be derived from the land for the proposed WWTP and landscape masterplan. Clarification is required to set out the soil balance, broken down by each soil type and the proposed re-use.</p>	<p>Regarding the volume of soil and site-won material, at the time of writing, excavation areas and design were not finalised. The soil volumes reported were for the surveyed area across the proposed WWTP and may not reflect the actual site-won volumes, which depend on design.</p> <p>The detailed specification of soil profiles and planting within the LERMP have not yet been detailed. Requirement 7, Detailed Design, and Requirement 11, LERMP within the dDCO (App Doc Ref 2.1) [AS-039] require details to be submitted to and approved by the relevant planning authority. Collectively these would include further details on the design of the earth bank and specifications in relation to planting and soils.</p>
<p>Appendix 1</p>	<p>Appendix 6.3 Outline Soil Management Plan - A detailed soil survey should be undertaken across all land subject to disturbance to inform the soil types, soil handling methodologies and restoration criteria.</p>	<p>The approach to the ALC survey area was completed in alignment with the scoping approach defined within the Scoping Report (App Doc Ref 5.4.4.2) [APP-080]. This provides a rationale for the survey areas included in the baseline.</p> <p>Para 1.1.4 of the outline SMP states that <i>'for areas not subject to detailed soil survey, the desktop study was utilised to inform the baseline, as such, the soil management measures specified in Section 5 are applied provided that a soil specialist is present on-site to monitor key soil management stages, or that a soil specialist has delivered appropriate training to the Contractor prior to the commencement of the construction. The controls and management measures presented in the Outline SMP apply to all soils within the Scheme Order Limits'</i>.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The CoCP Part A (App Doc Ref 5.4.2.1) [APP-068] para 7.4.32 includes the following requirement in relation to further survey, 'Prior to construction, specific measures to protect soils will be set out in a detailed Soil Management Plan (SMP), based upon the Outline Soil Management Plan (Appendix 6.3, App Doc Ref 5.4.6.3) and if required supplemented, by additional survey data'.</p> <p>The Applicant notes that Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-039] secures the provision of a detailed soil management plan for each phase of the development, to be submitted and approved alongside the CEMP for such phase. These will accord with the requirements of the Outline SMP (App Doc Ref 5.4.6.3). Through this approval process, the Applicant would agree with the LPA a monitoring schedule should it be required. The Applicant therefore considers that Requirement 9 of the draft DCO the approval of such management plans sufficiently addresses this comment.</p> <p>Requirement 8 of the DCO secures compliance with the Code of Construction Practice. Section 4 of the CoCP Part A para 4.4.4 specifies required plans as part of the overall CEMP.</p>
Appendix 1	Appendix 6.3 Outline Soil Management Plan - Clear distinction is needed throughout the SMP between the land under permanent development, landscaping and land temporarily disturbed as a result of the pipeline installation – including proposed soil profile characteristics; and the land under temporary disturbance which will be restored to pre-development ALC grades.	<p>The Outline SMP (App Doc Ref 5.4.6.3) [AS-060] is written as an Outline SMP, intended to provide a template for detailed SMP when project design is finalised.</p> <p>Section 5.2 of the Outline SMP (App Doc Ref 5.4.6.3) [AS-060] notes that 'Prior to the commencement of construction there should be a detailed review of the area required for construction activity including and assessment of all areas where there will be a requirement to excavate for the purpose of construction' and 'To</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Landscaping and restoration soil profile criteria should be included.</p> <p>There needs to be a clear distinction between the soils being stockpiled in areas undergoing temporary development and will be restored to baseline conditions; and the soils being used for landscaping (and soils being used for the bund).</p> <p>Soil nutrient levels and the soil balance should be presented for each soil type intended to be handled, or each soil type within a field, where appropriate.</p> <p>The SMP should include the restoration criteria for all land to be returned to agricultural use, including the ALC grade and soil properties.</p> <p>Consideration is required regarding the soil handling and mitigation measures potentially required for the peat and buried peat soils.</p> <p>For the area of permanent development, the SMP should demonstrate the sustainable, beneficial soil re-use of potential surplus soil resources.</p> <p>Plans of the detailed ALC grades should be produced to inform restoration and allow confirmation that the current baseline across the Site has been restored.</p>	<p>secure effective delivery of the SMP, the Principal Contractor(s) must implement it through location-specific construction method statements. 'Locations' will be determined by the Principal Contractor(s) or their soils specialist depending upon factors...'. </p> <p>The outline SMP (App Doc Ref 5.4.6.3) [AS-060] has been written to inform soil management principles based on soils identified on site ahead of receiving the precise information on the end use of soils from specific areas. It should be updated as more information becomes available. The outline SMP does provide guidance on soil handling protocols specific to soil profile criteria. Section 5.4 describes restoration criteria for soils to be returned to agricultural use, including ALC grade and soil properties.</p> <p>The Applicant notes Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-039] secures the provision of a detailed soil management plan for each phase of the development, to be submitted and approved alongside the CEMP for such phase. These will accord with the requirements of the SMP (App Doc Ref 5.4.6.3) [AS-060].</p> <p>The applicant agrees has updated the Outline SMP (App Doc Ref 5.4.6.3) [AS-060] to include consideration of peat handling. This updated document is included in the Applicant's submission at Deadline 1.</p> <p>The Outline SMP (App Doc Ref 5.4.6.3) [AS-060] refers to the sustainable reuse of surplus soils as part of the landscape masterplan as referenced within the LERMP (App Doc Ref 5.4.8.14) [AS-066].</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>A soil balance should be prepared to identify the potential surplus of different soil types across the Site and identify opportunities for the sustainable re-use of this resource on site.</p>	<p>A figure of the ALC grades on site (as determined by the ALC survey) has been produced and reported in the ES Vol 3 Book of Figures Agricultural Land and Soils (App Doc Ref 5.3.6) [AS-049].</p> <p>Regarding a soil balance, at the time of the assessment, excavation areas and design were not sufficiently detailed. The soil volumes reported within the ES Chapter 6 (App Doc Ref 5.2.6) [AS-024] were for the surveyed area across the land required for the proposed WWTP and may not reflect the actual site-won volumes, which depend on design.</p> <p>The detailed specification of soil profiles and planting within the LERMP (App Doc Ref 5.4.8.14) [AS-066] have not yet been determined. Requirement 7, Detailed Design, and Requirement 11, LERMP within the dDCO (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 details on the design of the earth bank and specifications in relation to planting and soils.</p>
Appendix 1	<p>Appendix 6.3 Outline Soil Management Plan - Natural England welcome that the soil resources would be re-used on site. However, this is not clearly reflected in the Landscape, Ecological and Recreational Management Plan.</p> <p>Volumes of soil resource to be re-used should be provided, split into soil type and restoration area, which is reflected in the Landscape, Ecological and Recreational Management Plan.</p>	<p>The Outline SMP (App Doc Ref 5.4.6.3) [AS-060] refers to the sustainable reuse of surplus soils as part of the landscape masterplan as referenced within the LERMP (App Doc Ref 5.4.8.14) [AS-066].</p> <p>The Applicant also refers to measures relating to the reuse of materials within the Proposed Development as set out within CoCP Part A [APP-068], Section 7.9 (Waste management and</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Clarification should be provided in the SMP on the extent of soil movement, storage and reuse across the site during construction and operation.</p>	<p>resource use, Waste minimisation) which requires the implementation of an approved Materials Management Plan.</p> <p>The Applicant notes that Requirement 9 of the draft DCO (App Doc Ref 2.1) [AS-139] secures the provision of a Materials Management Plan for each phase of the development, to be submitted and approved alongside the CEMP for such phase.</p>
<p>Appendix 1</p>	<p>Appendix 6.3 Outline Soil Management Plan - Figure 5.1 makes reference to the MAFF (2000) Best practice. This has been superseded by the Institute of Quarrying Good Practice Guide for Handling Soils in Mineral Workings (2021).</p> <p>For restoration to high agricultural quality, the best practice for soil handling is using the excavator-dump truck combination in conjunction with the sequential 'strip' method (Sheets A – D), Institute for Quarrying 2021 Soils Guidance (quarrying.org). This is essential on land to be restored to agricultural use following temporary disturbance (i.e. under the pipelines).</p> <p>To avoid risk of soil damage and compaction, bulldozers (as currently proposed in the SMP) should not normally be employed for soil stripping or replacement for soils being restored. Reference should be made to Sheet K where low ground pressure bulldozers are to be used during topsoil replacement.</p> <p>Soil depths should be informed by the pre-construction ALC survey and checked by the Site soil Scientist.</p>	<p>The Applicant confirms that the reference in the Outline SMP (App Doc Ref 5.4.6.3) [AS-060] has been updated to reflect this comment. This updated document is included at Deadline 1.</p> <p><u>Soil handling</u></p> <p>The Applicant acknowledges the comment in relation to soil handling and the use of low ground pressure bulldozers. The Applicant will endeavour to use these methods where feasible however notes that it is not practicable to apply these methods in all locations.</p> <p><u>Reinstatement of agricultural land</u></p> <p>The outline SMP (App Doc Ref 5.4.6.3) [AS-060], Section 5.3. Soil reinstatement and reuse, para 5.4.2 states that the main objective for the reinstatement of agricultural land is to restore the land to its original (pre-development) soil quality, as determined by ALC grade obtained during the pre-construction survey.</p> <p>The Applicant notes the comments in relation to reinstatement of the soil profile.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>The main objective for the reinstatement of agricultural land is to restore the land to its original (pre-development) agricultural quality, as determined by ALC grade and soil characteristics obtained during the pre-construction survey. This is primarily achieved by ensuring that the full soil profile is reinstated in the correct sequence of horizons to the right depths, and in a state where good soil profile drainage and plant root development are achieved; and by ensuring that the reinstatement works cause minimum damage to soil structure.</p>	
<p>Appendix 1</p>	<p>Appendix 6.3 Outline Soil Management Plan 5.3.21 - Topsoil stockpiles should be no higher than 3 m as per the Defra Construction Code. The Subsoil can be stored no higher than 5 m.</p>	<p>The Applicant has amended the outline soil management plan (App Doc Ref 5.4.6.3) [AS-060] to take account of stockpile heights comments. This updated document is included in the Applicant's submission at Deadline 1.</p>
<p>Appendix 1</p>	<p>Appendix 6.3 Outline Soil Management Plan A.2 - The Operations Checklists are welcomed, however a 'stop' mechanism should be employed if the criteria are not hit, i.e. where a box gets a red cross, the works must not proceed until the box can be checked off. Cross referencing to the SMP or guidance would be useful here, particularly with regards to 'has the appropriate equipment been selected'</p> <p>3. Topsoil stripping – has topsoil stripping depth 'and location' been defined...</p> <p>7. Sourcing and importing soil – Will this occur on this site?</p> <p>8. Topsoil manufacture– Will this occur on this site?</p>	<p>The Applicant notes the comments in relation to the checklist and confirms a stop mechanism can be included.</p> <p>3. Similar to previous responses the Applicant confirms that the level of detail in relation to topsoil stripping is not yet developed to this level of detail and that detailed SMP will be prepared including these details.</p> <p>The Applicant notes that Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] secures the provision of a Soil Management Plan for each phase of the development, to be submitted and approved alongside the CEMP for such phase. The detailed plans shall</p>

Reference	Relevant Representation Comment	Applicant's Response
	9. Soil Aftercare. Need to confirm the ALC Grade has been suitably restored, where applicable, with reference to pre-construction ALC survey results.	<p>accord with the requirements of the outline SMP (App Doc Ref 5.4.6.3) [APP-060].</p> <p>7. The Applicant confirms its intent to develop the Proposed Development to re-use and incorporate site won soils.</p> <p>8. The Applicant does not expect topsoil manufacture to be required.</p> <p>9. The Applicant refers to section 5.5 of the outline SMP (App Doc Ref 5.4.6.3) [APP-060] which acknowledges soil aftercare.</p>
Appendix 1	ES Vol 3 Book of Figures Agricultural Land and Soils - Figures 6.5 and 6.6: Subsoil nutrient map: Mg and P; and Figures 6.8 and 6.9 Topsoil nutrient map: Mg and P. However extractable potassium ranges displayed in extraction method box Are Figures 6.1 and 6.15 replicates?	The Applicant confirms that the Figures have been updated within Application document reference 5.3.6 Figures Agricultural land and soils (App Doc 5.3.6) [AS-049].

Table 3-14: Network Rail (RR-017)

Reference	Relevant Representation Comment	Applicant's Response
	As the Promoter proposes to compulsorily acquire land and rights to be exercised in close proximity to the Railway (including in particular new rights in, restrictive covenants over and temporary possession of Railway line and those rights below the subsoil) Network Rail wishes to object to the making of the Order on the basis that the rights sought will interfere with the safe and efficient operation of the Railway.	The Applicant has included protective provisions for the benefit of Network Rail within the draft Order and is liaising with Network Rail on the detail of these provisions and associated asset protection arrangements.

Reference	Relevant Representation Comment	Applicant's Response
	<p>In order for Network Rail to be in a position to withdraw its objection Network Rail will require adequate protective provisions and/or requirements to be included within the Order and obligations on the Promoter to ensure that the new rights sought are exercised in regulated manner to prevent adverse impacts to the Railway.</p> <p>We note that the Promoter has proposed protective provisions for the benefit of Network Rail within the draft Order, so the principle of this approach is not anticipated to be an issue. In the absence of such protection for the benefit of Network Rail so that it can ensure there is no risk to the rail network, there is a real likelihood that execution of the Scheme would be seriously detrimental to the Railway undertaking.</p>	

Table 3-15: Historic England (RR-014)

Reference	Relevant Representation Comment	Applicant's Response
	<p>Historic England's primarily concern is to ensure that the historic environment is adequately and appropriately considered within the submitted ES, and that any concerns we have previously raised have been addressed. Likewise, that the DCO is worded to ensure appropriate mitigation for the historic environment and the dissemination of the result. Our full written representation will therefore make further, detail comment with regards to the impact of the scheme upon.</p>	<p>The Applicant notes Historic England's concern in relation to how the historic environment is adequately and appropriately considered. The Applicant refers to the ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) [AS-031] and confirms that appropriate mitigation is secured through the dDCO (App Doc Ref 2.1) [APP-039]. In particular, Requirement 8, which secures compliance with the CoCP. The Applicant refers to the CoCP Part A, 7.3 Historic Environment, which requires an Archaeological Investigation Mitigation Strategy (AIMS) to be</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>produced in line with an archaeological brief which will be issued by the Cambridgeshire Historic Environment before works commence.</p> <p>The Applicant will seek to engage with Historic England in relation to further representations and will record agreements within the SoCG.</p>

Table 3-16: Conservators of the River Cam (RR-023)

Reference	Relevant Representation Comment	Applicant's Response
	<p>Under these current plans, Anglian Water propose to create an outfall into the river as well as creating two transfer tunnels beneath the river Cam. The Conservators are concerned that this project will affect the ability of the Conservancy to adequately fulfil its statutory responsibilities of navigation for this stretch of water during the construction process and that both the short and long term consequence of the project may negatively impact the river, its banks, its ecology and the navigation of its users.</p>	<p>The ES Chapter 2 Project Description (App Doc Ref 5.2.2) [AS-034] and the Design Plan – Sewer Tunnels and Longitudinal Sections (App Doc Ref 4.12) [APP-026] and the Design Plans – Outfall & Effluent Storm Pipeline Plans Final Effluent Longitudinal Section (App Doc Ref 4.13) [APP-027] explain the crossings underneath the river Cam.</p> <p>The Application includes proposals for the following.</p> <p>One transfer tunnel from the site of the existing Cambridge WWTP to the proposed WWTP. This would pass at a depth of approximately 10m below the river Cam (Design Plans – Outfall & Effluent Storm Pipeline Plans Final Effluent Longitudinal Section) (App Doc Ref 4.13) [APP-027] and not interfere with the bed, banks or byelaw margin of the river Cam.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>One storm and one treated effluent pipeline passing from the proposed WWTP to the proposed outfall location on the east bank of the river Cam.</p> <p>The Waterbeach Pipelines which cross underneath the river Cam at two locations one of which is not within the area covered by the Conservancy. These do not interfere with the bed, banks or byelaw margin of the river Cam.</p> <p>The Applicant has engaged with the conservators in relation to the following matters.</p> <ul style="list-style-type: none"> • The siting and design of the proposed Final Effluent Outfall <p>The construction of the proposed Final Effluent Outfall including the timing of these works and maintaining a navigable width</p> <p>Measures incorporated into the Final Effluent Outfall and riverbank protection works either side of the proposed outfall including a design to encourage regrowth of marginal vegetation</p> <p>In relation to navigation the CoCP Part B Section 3.1 requires that the usable width of the river will be narrowed for no more than 4 months and remain navigable to all permitted users. It also states that an outfall management plan will be prepared prior to construction setting out all measures in relation to the management and monitoring of the outfall.</p>

Reference	Relevant Representation Comment	Applicant's Response
		Requirement 10 of the dDCO (App Doc Ref 2.1) [AS-139] states that any works within the area of Works Plan 32 must be carried out in accordance with the approved construction outfall management and monitoring plan.

Table 3-17: Environment Agency (RR-013)

Reference	Relevant Representation Comment	Applicant's Response
Water Resources	Please note that the text included in Appendix 20.5 and 20.6 of the Environmental Statement appears to have been mixed up. The submitted Flood Risk Assessment (Appendix 20.1 of the Environmental Statement) refers to fluvial modelling presented in Appendix 20.5 (entitled Fluvial Model Report). However, the Fluvial Model Report provides details of the 3D velocity mixing model, while Appendix 20.6 (entitled 3D Velocity Mixing Model) provides details of the fluvial modelling undertaken to inform the Flood Risk Assessment (FRA). We have therefore referred to Appendix 20.6 instead of Appendix 20.5 in our comments below. Issue 1.1 Potential increase in flood risk to third party land and properties.	<p>The Applicant acknowledges that Appendices 20.5 and 20.6 are incorrectly named and that the content of each has effectively been swapped. The Applicant confirms that this correction has been made and provided as follows.</p> <p>ES Chapter 20 Appendix 20.5 Fluvial Modelling Report (App Doc Ref 5.4.20.5) [AS-113] ES Chapter 20 Appendix 20.6 3D Velocity Mixing Report (App Doc Ref 5.4.20.6) [AS-114]</p>

Reference	Relevant Representation Comment	Applicant's Response
Water Resources	<p>Issue 1.1. The Fluvial Model Report included in Appendix 20.6 of the Environmental Statement presents the results of hydraulic modelling undertaken to assess the impact of the proposed outfall discharge into the River Cam on local flood levels in the River Cam. This modelling indicates that there will be increases in flood levels up to 22mm downstream of the outfall during smaller magnitude flood events. The FRA included in Appendix 20.1 of the Environmental Statement has not assessed the potential impact of this increase in flood levels on local flood risk, including any receptors (i.e. potential increase in flood extents and depths). Adequate mitigation needs to be provided to prevent any increase in flood risk elsewhere for all flood events, up to and including the 'design flood' (i.e. the 1% annual probability event, including an appropriate allowance for climate change).</p>	<p>The Applicant acknowledges that the fluvial flood model report modelling included in Appendix 20.5 of ES Chapter 20 Velocity mixing model (App Doc Ref 5.4.20.5) [AS-115] shows an increase in flood level of 22mm for the 1 in 2 year event (Appendix A, Table A.1). This is also referenced in Appendix 20.1 of the Flood Risk Assessment ES Chapter 20 Flood Risk Assessment (App Doc Ref 5.4.20.1) [APP-151].</p> <p>Within the fluvial flood model of Appendix 20.5 (App Doc Ref 5.4.20.5) [AS-115], Figure B.1 of Appendix B shows the 1 in 2 year flood extents. This shows flooding to be contained within channel for both existing and proposed outfall. Receptors within the flood plain would not be impacted.</p> <p>As the flood levels are maintained in-channel in the 1 in 2 year event, receptors within the flood plain would not be impacted by the modelled 22mm increase in flood level and therefore no mitigation is required.</p> <p>The updated River Cam Urban model (JBA, 2022) has been recently supplied by the Environment Agency. Hydraulic modelling is being rerun, and the FRA will be updated with new results shared with the Environment Agency and a revised FRA will be submitted at Deadline 3.</p>
Water Resources	<p>Issue 1.2. Insufficient information provided to allow us to determine whether the hydraulic model is fit for purpose Hydraulic modelling has been undertaken as part of the FRA (Appendix 20.1 of the Environmental Statement) to assess the impact of the proposed discharge into the</p>	<p>Appendix 20.1 Flood Risk Assessment (App Doc Ref 5.4.20.1) [APP-151] submitted makes use of the outputs reported in the Fluvial Model Report ES Chapter 20 - Appendix 20.5 - Fluvial Model Report (App Doc Ref 5.4.20.5) [AS-113] and Mixing Model Report ES - Chapter 20 - Appendix 20.6 3D - Velocity</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>River Cam on local flood risk. As the model files have only recently been provided to us for review, we have not had sufficient time to review the model and determine whether it is acceptable for the purpose of this DCO.</p>	<p>mixing model (App Doc Ref 5.4.20.6) [AS-114], of which the former relies on the use of a hydrodynamic model obtained from the Environment Agency. The Environment Agency have raised a concern that the fluvial model provided to the Applicant dates from 2013 and that the use of it has not been reviewed in relation to completion of a site specific Flood Risk Assessment (FRA).</p> <p>The Environment Agency advised that an updated hydrodynamic model of the river Cam would be available from them at the end of September 2023 and this could be used to complete updated fluvial modelling. The updated model was received by the Applicant in mid October 2023. The Applicant confirms that fluvial modelling will be rerun using the September 2023 model and an updated model and Fluvial Model Report will be shared with the EA for review at Deadline 3. The FRA will be updated and shared with the EA, Natural England and the Lead Local Flood Authority (LLFA). It is anticipated that this would be no later than Deadline 4.</p>
<p>Groundwater protection and contamination</p>	<p><i>Groundwater Protection and Contamination Issue 1.3 – Insufficient preliminary assessment and analysis. There is further clarification, justification and information that needs to be supplied to demonstrate that there will be no detrimental impact on groundwater.</i></p> <p>Appendix 14.1: Preliminary Risk Assessment, 5.4.14.1, April 2023</p> <p>We are generally satisfied with this report and in agreement with the conclusions and recommendations.</p>	<p>The Applicant confirms that the extent of the Waterbeach WRC is included in the assessment but not brought to CSM.</p> <p>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. The Applicant has amended the appendix and it is included as part of the Applicant's submission at Deadline 1. The Applicant has provided these to the Environment Agency in advance of this amendment.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>However, it is not clear why the conceptual site model and preliminary qualitative risk assessment (PRA) make no reference to the Waterbeach Water Recycling Centre (WRC). In addition, previous reports are referenced but not provided, and the ENVIROCHECK report covers only part of the area within the Scheme Order Limits.</p>	<p>With respect to the query regarding previous reports listed in the reference, the Applicant has updated the Appendices to Chapter 14 Land Quality (App Doc Ref 5.2.14) [AS-032] and now includes the following.</p> <p>Appendix 14.6 Groundwater Investigation Waterbeach (App Doc Ref 5.4.14.6). [AS-095] Appendix 14.7 Ground Investigations Report Cambridge WWTP (App Doc Ref 5.4.14.7) [AS-136a] Appendix 14.8 Ground Investigations Report B Cambridge WWTP (App Doc Ref 5.4.14.8) [AS-096] Appendix 14.9 Preliminary Ground Investigation Factual Report Cambridge WWTP (App Doc Ref 5.4.14.9) [AS-097] Appendix 14.10 Geotechnical Interpretative Report (App Doc Ref 5.4.14.10) [AS-098]</p>
<p>Groundwater protection and contamination</p>	<p>Appendix 14.3 Geoenvironmental Results proposed WWTP, 5.4.14.3, April 2023</p> <p>We are unable to make sense of the soil analysis results. In addition, accreditation information has not been supplied and there is therefore a potential question mark over the robustness of the results. The measured concentrations of contaminants within leachate samples are unlikely to pose an unacceptable risk to controlled waters. However, if the U in the accreditation column indicates an unaccredited method, then there is a potential question mark about the robustness of the results. The groundwater analysis, taken overall, are not</p>	<p>The Applicant notes the comments. A higher resolution document has been provided by the Applicant.</p> <p>The Applicant notes that leachate results do have some accreditation details provided (U indicates the test is UKAS accredited) and a lot of results are accredited although there are exceptions. Soil results are in the most part both UKAS and MCERTS accredited. Again, there will always be exceptions for certain determinants but the overall level of accreditation is sufficiently robust to provide information for the ES.</p> <p>Accreditation is contained on the lab sheets provided as part of the ground investigation factual reports provided as follows.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>indicative of widespread gross groundwater contamination. However, no accreditation information has been supplied, and the uncertainty about the magnitudes of impacts to groundwater from Cr III should be addressed. In addition, there was no testing for MTBE or pesticides even those were identified as potential contaminants within the PRA.</p>	<p>Appendix 14.6 Groundwater Investigation Waterbeach (App Doc Ref 5.4.14.6). [AS-095] Appendix 14.7 Ground Investigations Report Cambridge WWTP (App Doc Ref 5.4.14.7) [AS-136b] Appendix 14.8 Ground Investigations Report B Cambridge WWTP (App Doc Ref 5.4.14.8) [AS-096] Appendix 14.9 Preliminary Ground Investigation Factual Report Cambridge WWTP (App Doc Ref 5.4.14.9) [AS-097] Appendix 14.10 Geotechnical Interpretative Report (App Doc Ref 5.4.14.10) [AS-098]</p> <p>With regards to MTBE, it is acknowledged that this contaminant was identified as a potential contaminant of concern in the PRA, but no MTBE testing of water has been undertaken to date. It is noted that MTBE would be expected to be found in association with hydrocarbons, of which none were recorded in groundwater. It is noted that the MTBE sources on site are very low risk (i.e a diffuse source from highways) rather than more significant sources such as fuel filling stations. Given the lack of petrol range hydrocarbons identified by groundwater analyses, it is suggested that this can be used as an effective proxy for the absence of significant MTBE contamination. Should petroleum hydrocarbon contamination be encountered (e.g. in construction monitoring) then further work to assess its source and associated contaminants can be undertaken.</p> <p>It is acknowledged that pesticides may be associated with agricultural land and can be found in low concentrations in</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>groundwater through infiltration of rainwater through shallow soils. In this area, which comprises agricultural land (rather than any manufacture or storage of pesticides), it is more likely to occur as widespread diffuse very low concentration pollution source. Pesticides will naturally degrade in the environment, and, where associated with diffuse sources, may be found in the Chalk in the 0.1ug/l 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 were discounted as a contaminant of concern in the site investigation.</p> <p>Ammonia was not tested as total concentrations in soils but ammoniacal nitrogen has been tested in groundwater and soil leachate samples which provide and 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 be used in informing the detailed materials management plans (MMP). The CoCP Part A (App Doc Ref 5.4.2.1) [APP-079], Section 7.9 (Waste management and resource use, Waste minimisation) which requires the implementation of an approved Materials Management Plan.</p> <p>The Applicant notes that Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] secures the provision of a Materials Management Plan for each phase of the development, to be submitted and approved alongside the CEMP for such phase.</p>

Reference	Relevant Representation Comment	Applicant's Response
<p>Groundwater protection and contamination</p>	<p>Appendix 14.4 Geoenvironmental Results Waterbeach, 5.4.14.4, April 2023</p> <p>The concentrations of contaminants measured within soil samples are unlikely to pose an unacceptable risk to controlled waters. However, there was no testing for ammonium or pesticides even though these were identified as potential contaminants within the PRA, and no testing was targeted to the Waterbeach WRC. It appears that there was no testing of groundwater for this part of the scheme. We do not regard this as acceptable.</p>	<p>Requirement 8 of the dDCO (App Doc Ref 2.1) [AS-139] secures compliance with the Code of Construction Practice.</p> <p>Site investigation data from the land required for the proposed WWTP and Transfer tunnel was screened and is presented in the ES Chapter 14, Land Quality (App Doc Ref 5.2.14) [AS-032].</p> <p>The Waterbeach pipeline route was investigated in January 2022. This is reported in Appendix 14.6 Groundwater Investigation Waterbeach (App Doc Ref 5.4.14.6) [AS 093]. This comprised 12 shallow soil samples and the results of the testing is discussed in the baseline section of the ES Chapter 14, Land Quality (App Doc Ref 5.2.14) [AS-032]. Groundwater along the route was not tested although monitoring wells were installed and water level readings were taken.</p> <p>Ammonia was not tested as total concentrations in soils, but ammoniacal nitrogen has been tested in groundwater and soil leachate samples (Table 3-7, Table 3-8, Table 3-9 and Table 3-10 of ES Chapter 14: Land Quality (App Doc Ref 5.2.14) [AS-032], which 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 be used in informing 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.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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 any 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 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.</p> <p>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.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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. It is noted that MTBE would be expected to be found in association with hydrocarbons (as an additive to petrol). It is noted that the 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 (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. Should petroleum range hydrocarbon contamination be encountered (e.g. during construction monitoring), then further work to assess its source and associated contaminants can be undertaken.</p>
Land quality	<p>ES Chapter 14: Land quality, 5.2.14, April 2023</p> <p>It is concluded in this report that the impacts of contamination to land quality would not be significant. However, key items of supporting information are missing, including details of sampling methodologies, logs for exploratory holes, laboratory certificates, details of groundwater level monitoring, contextual information relating the locations of sampling points to specific sources identified with the PRA, and copies of previous</p>	<p>The Applicant has updated the Appendices to Chapter 14 Land Quality (App Doc Ref 5.2.14) [AS-032] and now includes supporting information within the following.</p> <p>Appendix 14.6 Groundwater Investigation Waterbeach (App Doc Ref 5.4.14.6). [AS-095]</p> <p>Appendix 14.7 Ground Investigations Report Cambridge WWTP (App Doc Ref 5.4.14.7) [AS-137b]</p> <p>Appendix 14.8 Ground Investigations Report B Cambridge WWTP (App Doc Ref 5.4.14.8) [AS-096]</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>investigation reports as referenced within the document. In addition, as noted in respect of the Geoenvironmental reports, we have concerns about the accreditation of laboratory methods, the lack of testing for some potential contaminants as identified within the PRA, and the lack of groundwater testing for the Waterbeach pipeline route.</p>	<p>Appendix 14.9 Preliminary Ground Investigation Factual Report Cambridge WWTP (App Doc Ref 5.4.14.9) [AS-097] Appendix 14.10 Geotechnical Interpretative Report (App Doc Ref 5.4.14.10) [AS-098]</p> <p>The Applicant confirms that they remain in discussion with the Environment Agency in relation to the programme of construction monitoring (including groundwater). The first of these discussions occurred in August 2023. 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 by the Applicant at Deadline 2.</p> <p>Requirement 22 of dDCO (App Doc Ref 2.1) [AS-139] requires the preparation of a detailed water monitoring plan. This will accord with the requirements in the Outline Water Quality Monitoring Plan.</p>
Land quality	<p>ES Volume 4 Chapter 14 Appendix 14.2 Contaminated Land Risk Assessments, 5.4.14.2, April 2023</p> <p>See comments provided for the Geoenvironmental and the Land Quality reports.</p>	<p>See the Applicant's response above.</p>
Groundwater	<p>Appendix 20.8: Update to Contaminant Transport Model, 5.4.20.8, April 2023</p> <p>We have not had the opportunity to review the digital CONSIM models for the contaminant transport</p>	<p>The Applicant acknowledges the comment and it is understood that no further action is required at this time.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>modelling assessment. However, from the information presented in this report, the set-up and parameterisation of these models appears to be satisfactory, and the conclusions are supported by the results of the modelling and defensible.</p>	
Groundwater	<p>Appendix 20.4 Dewatering Pump Test Technical Note, 5.4.20.4, April 2023 From the information presented in this report, the methodology and design of the pumping tests appears to be robust. The ranges in aquifer properties derived through analysis of the results are defensible, as are the conclusions reached regarding the likely magnitudes of construction dewatering impacts.</p>	<p>The Applicant acknowledges the comment and it is understood that no further action is required at this time.</p>
Water Resources	<p>ES Volume 4 Chapter 20 Appendix 20.12 Drainage Strategy, 4.20.12, April 2023 We understand from this report that the surface water drainage strategy for the proposed WWTW will not rely upon the use of infiltration Sustainable Drainage Systems (SUDs). The use of infiltration SUDs would only be acceptable where it can be demonstrated that they will not pose a risk to the wider water environment.</p>	<p>The Applicant acknowledges the comment and it is understood that no further action is required at this time.</p>
Water Resources	<p>ES Volume 4 Chapter 20 Appendix 20.9 HIA (Site Selection Stage), 5.4.20.9, April 2023 We previously commented on this report under a pre-application consultation and have not revisited it. We note that to an extent it is outdated as relevant supplementary or amended information has been made available e.g., via the dewatering pump test</p>	<p>The Applicant agrees with this summary. As observed, additional data has been collected since preparation of ES Volume 4 Chapter 20 Appendix 20.9 Hydrogeological Impact Assessment (HIA) (App Doc Ref 5.4.20.9) [APP-159]. These data has been used for 5.4.20.4 Appendix 20.4 Dewatering Pump Test Technical Note (App Doc Ref 5.4.10.4) [APP-154] and to inform ES Chapter 20 Water Resources (App Doc Ref 5.2.20) [AS-040].</p>

Reference	Relevant Representation Comment	Applicant's Response
<p>Water Resources</p>	<p>technical note, the contaminant transport model document and the water resources document.</p> <p>Environmental Statement Chapter 20: Water Resources, 5.2.20, April 2023</p> <p>We are in general agreement with the conclusions of this report. However, we expect further discussions with the applicant regarding requirements for groundwater monitoring. Proposals for such monitoring are outlined in Sections 4.1.278 to 4.1.280 and 40.2.140 to 4.2.144. However, a borehole location plan has not been provided and should be supplied so that we can further evaluate these specific proposals. In addition, we are concerned that groundwater monitoring for the new WWTW only is proposed. On a precautionary basis 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. We are particularly concerned about potential leakages from infrastructure that will be used for underground or sub-water table transmission of pollutants. As per 4.1.280 we expect the applicant to engage with us in order to reach agreement requiring the scope and duration of groundwater monitoring.</p>	<p>The Applicant welcomes the opportunity to engage with the Environment Agency regarding monitoring requirements. The first of these discussions occurred in August 2023. A schedule of groundwater monitoring proposals has been shared with the Environment Agency a further meeting in October 2023 concluded the arrangement for monitoring and an outline monitoring plan (App Doc Ref 5.4.20.13) has been included in the Applicant's submission at Deadline 1.</p> <p>In addition, the Applicant also refers to the following which secure the requirement to agree the approach to monitoring.</p> <p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] requires the construction environmental management plan to be submitted to and approved by the relevant planning authority</p> <p>Requirement 22 of the dDCO (App Doc Ref 2.1) [AS-139] requires an approved water quality monitoring plan prior to the start of operation.</p>
<p>Water Resources</p>	<p>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.</p>	<p>Detail of the water efficiency is included within the ES Chapter 2 Project Description (App Doc Ref 5.2.2) [APP-034] and water consumption estimates are set out within Table 2-20 of this document.</p>

Reference	Relevant Representation Comment	Applicant's Response
Water Resources	The applicant should be made aware that an abstraction licence will be required for any dewatering that takes place during construction.	The Applicant notes the comment and, on the recommendation of the Environment Agency will be submitting the appropriate construction de watering applications and impoundment licence to the Environment Agency prior to the Preliminary Inquiry. This is on the understanding and agreement that the detail within the applications, particularly in relation to the anticipated volumes, is the best estimate at this stage in the development.
Water Resources	Dewatering the proposed abstraction may lower groundwater levels locally and may derogate nearby domestic and licensed groundwater sources. The de-watering should not detrimentally affect local water features (including streams, ponds, lakes, ditches, or drains) this includes both licensed and unlicensed abstractions. We note that a consent to derogate agreement will be sought to offer protection to private water supply user. We would recommend monitoring is undertaken during the de-watering phase and mitigation identified to provide an alternative source of water should their water supply be impacted.	<p>The Applicant has specified in 5.2.20 the ES Chapter 20 Water Resources (App Doc Ref 5.2.8) [AS040] that groundwater level monitoring would be undertaken at domestic and licensed and groundwater sources that may be impacted by dewatering, for a period prior to, during and following all dewatering activities during construction at the proposed WWTP.</p> <p>A no-derogation agreement will also be offered to the owner of private supply sources. It will relate to that the provision of supply, in the unlikely event that the private supply from the groundwater source could be significantly affected by the dewatering, measures would also be taken to maintain a supply to the property. As indicated in Table 5-1 of the ES Chapter 20 Water Resources (App Doc Ref 5.2.20) [AS-040], mitigation measures 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. The Applicant welcomes further engagement with the Environment Agency on mitigation measures in the event of derogation of water supplies at domestic and licensed groundwater sources and confirms that arrangements in</p>

Reference	Relevant Representation Comment	Applicant's Response
		relation to ongoing consultation would be covered within the SOCG.
Water Resources	It is also noted that there is the potential to impact on water levels at Wilbraham Fen SSSI during the de-watering phase, which is a partial groundwater fed site. Again monitoring should be established and a review undertaken of level of risk and recovery times / and any mitigation options.	<p>The Applicant confirms that the assessment within the ES Chapter 20 Water Resources (App Doc Ref 5.2.20) [AS-040] has considered the impact of dewatering on Wilbraham Fens SSSI, Stow-cum-Quy Fen SSSI and Allicky Farm CWS. The analysis indicates that the impact upon groundwater levels at these sites due to dewatering of the TPS are predicted to be less than 1mm, which is a negligible impact.</p> <p>The Applicant further notes that groundwater level data on the updated (2023) Hydrology Data Explorer⁵, demonstrates groundwater level variations at Wilbraham Fens SSSI to be of the order of 500mm, possibly more. A potential water level variation of the order of 1mm (or even several millimetres) would not be identifiable within the established range of groundwater levels. It is therefore considered that additional monitoring at Wilbraham Fens should not be required.</p> <p>The Applicant has discussed monitoring during engagement meetings in August, September and October 2022 and an approach to monitoring has been agreed that with the Environment Agency including in relation to potential dewatering impacts on groundwater levels at SSSI and CWS sites. A draft Outline Water Quality Management Plan (App Doc Ref 5.4.20.13) has been agreed in principle with the Environment Agency has been submitted as part of the</p>

⁵ [Hydrology Data Explorer - Wilbraham Fen](#)

Reference	Relevant Representation Comment	Applicant's Response
		<p>Applicant's submission at Deadline 1. The final version of the plan, following approval from the Environment Agency, will be submitted at Deadline 2.</p>
<p>Biodiversity and Ecology</p>	<p>We are content with the information that has been provided and the appropriate mitigation measures being proposed ahead of/during construction. We are pleased to see the relevant licences have been applied for regarding water vole, badger and bats.</p> <p>We have some concerns regarding potential scouring at the outfall and we will need to be kept informed of the monitoring. We would recommend a reed bed system being implemented at the exit of the outfall, before reaching the watercourse. This would also be beneficial to keeping a steady discharge flow and keeping the water clean.</p>	<p>The Applicant has engaged with the Environment Agency in relation to the location and design of the outfall, the river protection either side of the proposed outfall, and the stopping up of the existing outfall.</p> <p>A meeting on 14th October 2021 included the objective of obtaining feedback (from the EA) and in principle agreement regarding the outfall requirements and the approach for CWWTPRP. This included a review of different outfall options. Integration of a reed bed was not considered suitable given its impact to the existing Public Rights of Way, however one option considered the inclusion of a ditch within the outfall which was ruled out for a number of reasons including its future status as a water body and monitoring changes over time.</p> <p>Subsequent meetings were held to review the design included integrated design features to dissipate energy and control the flow as it reaches the watercourse. 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 would be in the order of 90 ha. Details of this engagement is recorded in the Statement of Common Ground.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The effect of infrequent high flow events has been examined within the CFD report (App Doc Ref 5.4.20.7) [AS 157] which identifies the potential for scour during such events. The Applicant notes that the bank opposite the proposed outfall has existing steel sheet pile protection. The Applicant has indicated the intention to monitor the river in this location which will be implemented through the outfall management and monitoring plan. An outline plan has been prepared and Outline Outfall Management & Monitoring Plan (App Doc Ref 5.4.8.24) [AS-073].</p> <p>Requirement 10 of the dDCO (App Doc Ref 2.1) [AS-139] requires detailed plans to be prepared in relation to the Final Effluent Outfall and works plan areas 32 and 39. This would include design information relating ditch habitat creation, monitoring and maintenance measures to be submitted to and approved in writing by the local planning authority.</p> <p>The Applicant also refers to the Environmental Permitting Regulations and the requirement for the outfall to secure a flood risk activities permit (see Consents and Other Permits Register (App Doc Ref 7.1) [AS-123]). Through the process of obtaining the flood risk activities permit in relation to works on the river Cam, the Applicant would continue to consult with the EA and provide information in support of the permit application including detailed design information and supporting technical reports.</p>
Ecology	Biodiversity Net Gain	<p>The Applicant will update the ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163] and Appendix C in the report for Deadline 2, to include updated text</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>The statutory requirements for NSIPs to provide 10% BNG will become a legal requirement in 2025. The applicant is committed to 20% Biodiversity Net Gain (BNG) overall, with no 'trading down' in habitat condition or quality. We fully support this ambition.</p> <p>River units The applicant has recognised that delivery of river units on site is not possible due to the constraints on the river Cam at this location (river users, angling etc). However, they propose to purchase river units offsite as/when they become available. Is there some legal mechanism to ensure that this does actually occur?</p>	<p>relating to a change of 0.03 river units to 0.04 river units required off-site and change in reedbed habitat and ditch length figures.</p> <p>Measures to avoid trading down and achieve an increased net gain in river units are outlined in Appendix C: Outline River Units Net Gain Strategy of the ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (Doc ref 5.4.8.13) [AS-163] which at paragraph 1.2.2 sets out that 'In order to achieve a 20% BNG on river units the following is required.</p> <p>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.</p> <p>The majority of river units are to be delivered within the order limits as the creation of 227m of ditches is within the Order Limits in the area of Work No 39, as shown in the Figure <i>Indicative Alignment of Proposed Ditch Features</i> of Appendix C (Doc ref 5.4.8.13) [AS-163]. This leaves 0.03 BNG high distinctiveness river units to be delivered outside of the order limits because there are no opportunities to deliver these within the limits. This approach avoids trading down.</p> <p>In relation to securing a solution for offsite units, as stated at Appendix C: Outline River Units Net Gain Strategy [App Doc Ref 5.4.8.13] [AS-163] at 1.4.3, 'River unit credits are not currently available on the market, but are likely to be in the near future.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>A requirement within Schedule 2 of the dDCO (App Doc Ref 2.1) [AS-139] requires a detailed written scheme for the 0.03 BNG high distinctiveness river unit delivery prior to the commencement of the works at the proposed outfall (Work Area 32). Local opportunities are being tracked by the Applicant, however, timing of their delivery needs to align with Works No 32.</p> <p>The Applicant has amended requirement 10(6)(e) of the dDCO (App Doc Ref 2.1 Revision 5) to ensure that 20% BNG in respect of river units is delivered. The requirement now reads as follows.</p> <p style="padding-left: 40px;">“(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-</p> <p style="padding-left: 40px;">... (e) details of measures for the achievement of twenty percent biodiversity net gain comprising river units within or outside of the Order limits”</p> <p style="padding-left: 40px;">Some consequential amendments have been made to requirement 11(2).</p> <p>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.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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.</p>
Ditches	<p>Creating a new wetted ditch area to compensate for the loss of ditches in the site, and also to contribute to the water vole mitigation/ compensatory habitat. There is relatively recent clarification around the requirement for BNG and mitigation/ compensation.</p>	<p>The Applicant is not clear on the clarification referred to and will continue to coordinate with the Environment Agency in relation to the proposals for BNG in particular in relation to river units.</p>
	<p>Environmental Permitting Discharge Permit Appendix 20.11: Milton Water Recycling Centre Discharge Consent: Water Quality and Ecological Assessment, Revision No.01, April 2023 This report contains water quality modelling information for suspended solids and phosphorus limits. This modelling was undertaken following our response to an Environmental Permitting pre-permitting application consultation, Letter ref: ASCNF/1033/V004, dated 09/10/2020. Anglian Water have applied for an Environmental Permit for the proposed new site (received 09/09/2022). To avoid prejudicing the determination of the Environmental Permit application we will not be making comments on the modelling approach or results provided within our</p>	<p>The Applicant acknowledges that work in support of the Environmental Permit Application is separate to this DCO application.</p> <p>Appendix 20.3 - WFD Assessment Report (App Doc Ref 5.4.20.3) [APP-153], discusses consented water quality element discharge limits, which includes an analysis of phosphate. Catchment-wide water quality modelling of orthophosphate concentrations had been undertaken in Appendix 20.11: Milton Water Recycling Centre Discharge Consent: Water Quality and Ecological Assessment (App Doc Ref 5.4.20.11 [APP-161]. While this modelling was undertaken with respect to interim permitting conditions unrelated to this DCO application, the analysis provides useful context for WFD orthophosphate concentrations. The modelling serves no further purpose</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>response to this DCO application. If they have not already done so, the applicant may pass the modelling detail and results to us for consideration as part of the Environmental Permit application process.</p>	<p>within this DCO application, other than to provide supporting information on phosphate for the WFD assessment.</p>
	<p>Installations Permit - Sludge Treatment Centre (STC) The proposed anaerobic digestion plant and CHP will require an environmental permit under Schedule 1 of the Environmental Permitting Regulations 2010. We will be including the following key areas of potential harm when making an assessment for the Permit:</p> <ul style="list-style-type: none"> • Techniques for pollution control including in process controls, emission control, management, waste feedstock and digestate, energy, accidents, noise and monitoring. • Emission benchmarks for combustion products, temperature and pH. • Air quality impact assessment, including odour and Habitats Regulations Assessment. 	<p>The Applicant confirms that an application has been made for a Permit issued under EPR to give effect to the Industrial Emissions Directive (IED) and to ensure no adverse impact as a result of the operation of the Medium Combustion Unit Application. The original application was submitted to The Environment Agency in March 2023 following engagement to discuss standards and conditions and use of the EA pre-application service.</p> <p>This application was returned In September 2023 for further information and the application is now in the enhanced pre application process where details of further information sought on the key areas will be identified and supplied.</p>
	<p>Decommissioning Detailed advice has already been provided for the outline decommissioning plan of the current Sludge Treatment Centre. We are satisfied with the draft decommissioning plan (Appendix 2.3: Outline Decommissioning A Plan) that it sets out the process and follows the guidance that:</p>	<p>The Applicant acknowledges this response, and this confirmation is reflected within the Statement of Common Ground (SoCG).</p>

Table 3-18: UK Health Security Agency (RR-018)

Reference	Relevant Representation Comment	Applicant's Response
	<p>The UK Health Security Agency (UKHSA) welcomes the opportunity to comment on your proposals at this stage of the project. Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided is sent on behalf of both UKHSA and OHID.</p>	<p>The Applicant is grateful for the engagement and acknowledges the comments.</p>
	<p>We can confirm that: With respect to Registration of Interest documentation, we are reassured that earlier comments raised by us on 12 September 2022 have been addressed.</p>	<p>The Applicant acknowledges the comments.</p>
	<p>In addition, we acknowledge that the Environmental Statement (ES) has not identified any issues which could significantly affect public health. UKHSA and OHID are satisfied with the methodology used to undertake the Environmental Assessment.</p>	<p>The Applicant acknowledges the comments and confirms this is agreed.</p>
	<p>Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health. On that basis, we have no additional comments to make at this stage and can confirm that we have chosen NOT to register an interest with the Planning Inspectorate on this occasion.</p>	<p>The Applicant acknowledges the comment and agrees that the Proposed Development should not result in any significant impact on public health.</p>

Table 3-19: National Trust (RR-031)

Reference	Relevant Representation Comment	Applicant's Response
	<p>Beyond its own landholdings, the Trust has an interest in the extensive area of land in the corridor between the River Cam and the B1102 stretching from the A14 in the south to Wicken village in the north. This land is recognised as the “Wicken Fen 100 Year Vision Area” and the Trust, working with partners and landowners, has a long-term ambition to see this 53 square kilometre area managed for nature conservation with improved public access for recreation, community engagement and learning. A map of the Wicken Fen Vision Area taken from the National Trust’s Wicken Fen Vision document can be provided.</p>	<p>The Applicant acknowledges the comments and background information provided.</p>
<p>Principle of Development and Green Belt Impact</p>	<p>1. Principle of Development and Green Belt Impact The National Trust recognises the challenges related to population growth, housing delivery and climate change in the East of England and the need to supply, treat and recycle water. Greater Cambridge Shared Planning (Cambridge City Council and South Cambridgeshire District Council) has been working on a new Local Plan (the Greater Cambridge Local plan) since 2019. The most recent public consultation (First Proposals, Preferred Options) was held in 2021. The latest update to the Local Development Scheme indicates that, following further public consultation, the Proposed Submission Plan will not be submitted for examination until Summer/Autumn 2025. It is currently unclear how many new homes will be required over the new Local Plan period. However, there is clearly an interdependency between this application</p>	<p>The Applicant has addressed this in t. The Planning Statement (App Doc Ref 7.5) [AS-128] and in the comments on Need at 2.21 above.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>and emerging proposals for the redevelopment of the existing wastewater treatment site in Milton. It is clear from documents prepared by Greater Cambridge Shared Planning that the regeneration of northeast Cambridge has been a long-held ambition for the Councils. The relocation of the wastewater treatment plant would enable the development of a new district in northeast Cambridge, delivering 8,350 homes, 15,000 new jobs and a wide range of community, cultural and open space facilities. However, it is noted that Greater Cambridge Shared Planning will not commit to including the site within the draft Local Plan or adopt the North East Cambridge Area Action Plan (NECAAP) until such time that a Development Consent Order is granted for the relocation of the Waste Water Treatment Plant. It is also noted that the proposed site is not allocated in the National Policy Statement (NPS) for Waste Water or the Minerals and Waste Local Plan. Furthermore, it is not identified in the Environment Agency's National Environment Programme (NEP). It is also stated in the application documents that there is no operational need or requirement to replace the existing waste water treatment plant. The National Trust support the delivery of new development through a plan-led system and support the development of brownfield land in sustainable locations. However, in this case there is no adopted planning policy at national or local level which provides clear policy support for the relocation of the existing waste water treatment plant at Milton to an</p>	

Reference	Relevant Representation Comment	Applicant's Response
	alternative site to enable development proposals to be realised.	
Principle of Development and Green - BMV	Whilst the proposal would release a brownfield site at Milton for redevelopment, the proposed new facility would also result in the development of a greenfield site within the Cambridge Green Belt and the loss of best and most versatile agricultural land.	The Applicant notes the comments and has addressed this in the Planning Statement (App Doc Ref 7.5) [AS-166].
Principle of Development and Green	The National Trust's position on development in the Green Belt is that it must be carefully managed, and speculative development is not appropriate. We acknowledge that there are some limited circumstances where development is acceptable, or where very special circumstances are clearly demonstrated which might outweigh harm to the Green Belt. Whether the very special circumstances put forward by the Applicant justify the grant of development consent will be a matter for the Secretary of State.	The Applicant notes the comments and has addressed this in the Planning Statement (App Doc Ref 7.5) [AS-166].
Principle of Development and Green	The site falls within the Wicken Fen Vision Area which was launched in 1999 in order to increase the nature reserve around Wicken Fen creating a diverse landscape for wildlife and people over an area of 53 square kilometres, expanding southwards towards the edge of Cambridge. The proposed development will remove scope to restore land at this location back to semi natural habitat in the conventional sense, but it is recognised that the development is planned to provide at least 20% Biodiversity Net Gain.	The Applicant notes the comments and the support for the commitment to the deliver 20% Biodiversity Net Gain (BNG) overall, with no 'trading down' in habitat condition or quality.

Reference	Relevant Representation Comment	Applicant's Response
Principle of Development and Green	<p>The submitted Landscape, Ecological and Recreational Management Plan (LERMP, Application Document Reference: 5.4.8.14), and Environmental Statement recognises the Wicken Fen Vision and considers compatibility and alignment with the Vision in terms of habitat creation within development boundary. However, proposals are very limited as the geographical focus of the LERMP is on the immediate area around the proposed WWTP, not the entire project area. The Landscape Masterplan proposals should extend beyond the development boundaries and meaningfully contribute to ecological restoration and enhancement in the southern area of the Wicken Fen Vision area as well as providing enhanced recreational access opportunities and access to nature. At present ecological enhancement beyond the development site and at landscape scale is limited and should be explored further in the context of the Wicken Fen Vision objectives.</p>	<p>The Applicant notes the comments. The landscape proposals set out in the Landscape, Ecological and Recreational Management Plan (LERMP) (App Doc Ref 5.4.8.14) [AS-066], have been designed to deliver a minimum of 20% Biodiversity.</p> <p>Beyond these contributions provided within the Scheme 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.</p>
Principle of Development and Green	<p>Given the scale and significance of this development as a Nationally Significant Infrastructure Project, the proposed development of a greenfield site and the location of the site in the Green Belt and the Wicken Fen Vision Area, the Trust considers that the proposed development should be contributing significantly more towards the Local Nature Recovery Strategy and strategic Green Infrastructure initiatives, to benefit people, nature and climate. There are opportunities in the wider area to</p>	<p>The Applicant notes the comments. The Applicant will continue to engage with the National Trust in relation to the Local Nature Recovery Strategy and systematic and strategic approach to Green Infrastructure initiatives to consider support of future opportunities outside of the Proposed Development.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>provide better access for multiple users and deliver landscape scale enhancements working in partnership with other Conservation partners. It is disappointing that Applicant is not proposing anything more significant beyond the site's boundaries.</p>	
<p>Hydrology/ Hydrogeology</p>	<p>3. Hydrology/Hydrogeology</p> <p>The National Trust's interests relate to concerns relating to impacts on our sites arising from:</p> <ul style="list-style-type: none"> • Drainage from Site • Temporary dewatering in the West Melbury Marly Chalk Formation at the site • Treated effluent discharge <p>The National Trust notes that the Applicant's Habitats Regulations Assessment Screening Report concludes no likely significant effect for Wicken Fen Ramsar/Fenland SAC on the basis that no hydrological impact is expected. Anglesey Abbey County Wildlife Site (CWS) was also scoped out as the Applicant considered that there were no hydrological or ecological pathways to the site. Our concerns relate to surface water and groundwater drainage from the application site. We are concerned that there are possible pathways between the site and Wicken Fen Ramsar/Fenland SAC and Anglesey Abbey CWS. We have concerns related to the proposed dewatering of the site, the high permeability in the bedrock and the potential for works and operations</p>	<p>The Applicant has considered the impact of dewatering on Wilbraham Fens SSSI, Stow-cum-Quy Fen SSSI and Allicky Farm CWS, the ES Chapter 20 Water Resources (App Doc Ref 5.2.20) [AS-041]. The analysis indicates that the impact upon groundwater levels at these sites due to dewatering of the TPS would be less than 1mm, which is considered a negligible impact.</p> <p>The Applicant has engaged with The Environment Agency throughout the project and has shared the Hydrological Impact Assessment report (App Doc Ref 5.4.20.9) [APP-159] together with the contaminant transport modelling Report [APP-158] referenced within the ES Chapter 20 Water resources (App Doc Ref 5.2.20) [AS-040].</p> <p>The Environment Agency are in general agreement with the conclusions of these reports but also expect further discussions with the Applicant regarding requirements for groundwater monitoring. Proposals for such monitoring are already outlined in Sections 4.1.278 to 4.1.280 and 4.2.140 to 4.2.144 of the ES Chapter 20 Water resources (App Doc Ref 5.2.20) [AS-040]. The Applicant has continued to engage with the Environment Agency on this point and will continue to review and agree the scope of groundwater quality</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>associated with the development to transmit pollution to groundwater. The Trust wishes to ensure that appropriate monitoring of water levels and water quality is in place before construction, during construction and during operation. On & off-site monitoring is required to determine impacts on sensitive receptors, including potential pathways to impact our sites. Advice should be sought from statutory advisers on the above matters.</p>	<p>monitoring to ensure any unacceptable impacts to can be detected and appropriate mitigation measures implemented.</p> <p>The Applicant has now prepared an Outline Water Quality Monitoring Plan to cover the proposals for water quality monitoring. The Environment Agency has agreed the plan in principle, and so it has been included in the Applicant's submission at Deadline 1.</p>
<p>Access and recreation</p>	<p>4. Access and Recreation</p> <p>The National Trust notes the proposals for a new section of Bridleway to the northeast of the WWTP, as part of a 9.3km circular route (as shown in Figures 3.12 and 3.13 of the LERMP). The National Trust is generally supportive of the proposals for enhanced recreational connections and public access through new paths and green space. Enhancing public access aligns with the Wicken Fen Vision which aims to provide a varied for visitors to explore with benefits for health, well-being and community engagement. The proposed new bridleway access is welcomed, and a new pedestrian route will result in two circular walks, improving recreational opportunities for local residents and visitors. However, the proposed bridleway does not connect well to Anglesey Abbey and does not provide a direct route. This is likely to 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</p>	<p>The Applicant notes the supportive comments on the proposed new section of bridleway. Extending the bridleway to include additional existing private land ownership of the disused railway line, all the way, to Anglesey Abbey would be beyond the scope of the Proposed Development.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>north easterly direction, but this is on private land. During pre-application discussions the National Trust requested that Anglian Water explore 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.</p>	
<p>Access and recreation</p>	<p>The proposed new bridleway and circular route also runs very close to and will facilitate access to Stow-Cum-Quy Fen SSSI (not owned by the National Trust but within the Wicken Fen Vision area) and beyond that to Anglesey Abbey. The Trust is aware that Stow-Cum-Quy Fen SSSI is already under significant visitor pressure. We recognise that an uplift in recreational use of the area could have negative implications on sensitive designated sites through increased disturbance, damage, contamination, etc and also impact on the surrounding public rights of way. The impacts of this application must be considered cumulatively with uplift in recreational use of the area associated with the proposed housing growth which will be delivered through the existing and emerging Local Plan, including the housing which will be enabled by the proposed development. The Trust considers that the impacts on the SSSI and surrounding area have not been</p>	<p>The Applicant has assessed the impact of recreational users and this is set out in the ES Chapter 8 Biodiversity section 4 (App Doc Ref 5.4.8) [AS-027]. The Applicant does not consider the new bridleway status of a section of existing track or proposed pathways within the LERMP, will increase the effects on the Stow Cum Quy Fen area.</p> <p>The Applicant confirms that the North East Cambridge A Biodiversity Assessment⁶ (MIKA 2020), Sustainability Appraisal⁷ (2021), Topic Paper: Open Space & Recreation (2021)⁸ and The Greater Cambridge Green Infrastructure Opportunity Mapping⁹ (LUC, 2021) have been reviewed in relation to understanding how potential biodiversity impacts in relation to recreational pressures associated with the NECAPP have been considered in relation to the development of the APP.</p>

⁶ <https://www.greatercambridgeplanning.org/media/1243/ecology-study-a-biodiversity-assessment-2020.pdf>

⁷ <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-11/NECAAPSustainabilityAppraisal2020v22021.pdf>

⁸ <https://www.greatercambridgeplanning.org/media/1268/open-space-topic-paper.pdf>

⁹ https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-09/GREATE~3_0.PDF

Reference	Relevant Representation Comment	Applicant's Response
	<p>adequately assessed. The assessment is missing robust baseline visitor surveys, a recreational impact assessment, and a recreational management strategy, including appropriate mitigation measures.</p>	<p>The NEC Sustainability Appraisal (2021) identifies potential recreational pressures at Bramblefields Local Nature Reserve but does not include reference to Stow-cum-Quy Fen.</p> <p>The MIKA (2020) report identifies that <i>'the development of NEC provides a unique opportunity to create a new biodiversity hotspot at Chesterton Fen which can deliver a suite of priority habitats and species that reflect the local landscape. This feature would also serve as a green gateway on the edge of the city which connects to wider schemes such as the National Trust Wicken Vision and the River Cam green corridor'</i>. The assessment does not go on to identify any conflict in relation to recreational pressure but does however conclude that development of NEC would offer greater opportunities for public engagement with nature, and the subsequent health and well-being benefits.</p> <p>The Open Space Topic Paper refers to another study investigating assessed Green Infrastructure assets both individually and collectively. The Greater Cambridge Green Infrastructure Opportunity Mapping (LUC, 2021) includes a consideration of Stow cum Quy SSSI as part of Strategic Initiative 4: Enhancement of the eastern fens. In relation to recreational pressures this document states that negative impacts from access and recreational pressure are minimised through habitat buffers and educating visitors.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The LERMP (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 successfully 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 the LERMP to formalise how people are already using the land required for the proposed WWTP rather than encouraging intensification of use.</p> <p>The assessment has not identified significant residual effects on this receptor, however recognising the uncertainty in relation to predicting how people may use this area, the Applicant has included with the LERMP (App Doc Ref 5.4.8.14) [AS-066] the requirement to complete user surveys and the intention to set up an Advisory Group. Through this group matters such as recreational users can continue to be discussed and managed.</p> <p>The Applicant also refers to paragraph 4.1.2 and 4.1.4 within section 4 of the LERMP (App Doc Ref 5.4.8.14) [AS-066] which confirms the intention to set up an Advisory Group. Through this group matters such as recreational users can continue to be discussed and managed.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The Applicant would continue to engage with relevant stakeholders including but not limited to the LPA 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.</p> <p>The requirements within the LERMP (App Doc Ref 5.4.8.14) [AS-066] are secured by Requirement 11 in the dDCO (App Doc Ref 2.1) [AS-139] relating to the detailed landscape scheme and LERMP which will be approved by Natural England and the local planning authority.</p> <p>Requirement 11 of the dDCO (App Doc Ref 2.1) [AS-139] fulfils this requirement and requires that the detailed plan accords with the LERMP (App Doc Ref 5.4.8.14) [AS-066].</p>

4 Responses to Community and Affected Persons' Relevant Representations

4.1 Thematic responses

Table 4-1 Green Belt

Reference	Relevant Representation Comment	Applicant's Response
RR-237, RR-261, RR-280, RR-078, RR-281, RR-219, RR-202, RR-171, RR-278, RR-307, RR-063, RR-072, RR-181, RR-247, RR-291, RR-101, RR-172, RR-193, RR-299, RR-304, RR-081, RR-306, RR-089, RR-216, RR-221, RR-270, RR-290, RR-077, RR-052, RR-092, RR-186, RR-240, RR-243, RR-225, RR-205, RR-251, RR-198, RR-230, RR-045, RR-093, RR-196, RR-201, RR-244, RR-276, RR-139, RR-153, RR-131, RR-169, RR-062, RR-085, RR-140, RR-148, RR-154, RR-194, RR-199, RR-208, RR-183, RR-211, RR-019, RR-048, RR-135, RR-163, RR-236, RR-255, RR-271, RR-044, RR-053, RR-070, RR-233, RR-264, RR-300, RR-057, RR-102, RR-146, RR-167, RR-200, RR-224, RR-046, RR-108, RR-119, RR-204, RR-207, RR-254, RR-267, RR-279, RR-066, RR-069, RR-164, RR-179, RR-262, RR-058, RR-067, RR-149, RR-155, RR-156, RR-184, RR-175, RR-079, RR-152, RR-272, RR-050, RR-065, RR-074, RR-112, RR-122, RR-218, RR-238, RR-258, RR-054, RR-056,	General concern regarding construction of the project on greenbelt land. A point commonly stated was that construction on the green belt is contrary to local and national planning policies.	<p>The Applicant has set out in Section 6.2 of the Planning Statement (App Doc Ref 7.5) [AS-128] the Very Special Circumstances case of the proposed development within the green belt, plus how the proposed development complies with national and local planning policies on development within the green belt. Paragraph 4.8.34 sets out those elements of the proposed development which fall within the exceptions at paragraph 150 of the NPPF. Paragraphs 6.2.6 to 6.2.12 detail the assessment of sites, the suitability of the chosen site, and outlines the lack of alternative sites available. The site selection and consideration of alternatives is also summarised in ES Chapter 3 Site Selection and Alternatives (App Doc Ref 5.2.3) [AS-018].</p> <p>As described in the Design and Access Statement (DAS) (App Doc Ref 7.6) [AS-168] under the heading 'Optimising Land Take' (paragraph 6.3.1),</p>

Reference	Relevant Representation Comment	Applicant's Response
RR-059, RR-068, RR-073, RR-082, RR-098, RR-106, RR-107, RR-124, RR-127, RR-141, RR-143, RR-150, RR-168, RR-178, RR-190, RR-191, RR-227, RR-263, RR-266, RR-269, RR-282, RR-284, RR-286, RR-288, RR-292, RR-047, RR-100, RR-103, RR-105, RR-109, RR-110, RR-114, RR-115, RR-121, RR-123, RR-125, RR-151, RR-166, RR-176, RR-182, RR-187, RR-197, RR-213, RR-215, RR-217, RR-228, RR-229, RR-235, RR-256, RR-265, RR-268, RR-275, RR-293, RR-297, RR-298, RR-051, RR-060, RR-064, RR-071, RR-080, RR-090, RR-096, RR-223, RR-113, RR-116, RR-126, RR-128, RR-132, RR-144, RR-145, RR-157, RR-158, RR-160, RR-161, RR-170, RR-173, RR-189, RR-212, RR-231, RR-137, RR-239, RR-242, RR-248, RR-250, RR-259, RR-024, RR-273, RR-277, RR-287, RR-303, RR-309, RR-022, RR-037, RR-027, RR-029		<p>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 measures incorporated in the design of the</p>

Reference	Relevant Representation Comment	Applicant's Response
RR-217, RR-167, RR-204, RR-175, RR-061, RR-114, RR-151, RR-297, RR-242, RR-027	Respondents stated that the 'very special circumstances' requirement to build in the green belt had not been met.	<p>Proposed Development to reduce harm to the Cambridge Green Belt.</p> <p>The Applicant directs Respondents to the paragraph 4.8.34 of the Planning Statement (App Doc Ref 7.5) [AS-128] where the Applicant sets out those elements of the scheme which fall within the exceptions at paragraph 150 of the NPPF.</p> <p>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-128] the Applicant considers that the very special circumstances needed to justify the grant of development consent in this instance have been demonstrated.</p>
RR-212, RR-166, RR-284, RR-143, RR-055, RR-072, RR-193, R-077, RR-093, RR-201, RR-148, RR-194, RR-204, RR-254, RR-267, RR-255, RR-175, RR-044, RR-152, RR-118, RR-258, RR-068, RR-197, RR-229, RR-071, RR-117, RR-128, RR-212, RR-239, RR-242, RR-029, RR-037	Respondents reported concern regarding the project being constructed on arable land. Specific concerns are linked to food security.	<p>The large prevalence of best and most versatile (BMV) land within a 2km radius of the selected development location means that there is no alternative to the use of BMV land for the Proposed Development within this location.</p> <p>The Applicant has reduced the impact on the loss of the BMV land by minimising the land required for the project.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>For further information please see ES Chapter 6: Agricultural Land and Soils (App Doc Ref 5.2.6) [AS-024].</p>
<p>RR-037, RR-281, RR-072, RR-101, RR-172, RR-195, RR-081, RR-290, RR-077, RR-186, RR-251, RR-037, RR-093, RR-201, RR-153, RR-140, RR-148, RR-183, RR-163, RR-179, RR-044, RR-070, RR-300, RR-119, RR-207, RR-267, RR-164, RR-058, RR-050, RR-074, RR-112, RR-118, RR-122, RR-238, RR-034, RR-124, RR-141, RR-029, RR-190, RR-191, RR-266, RR-284, RR-288, RR-177, RR-215, RR-064, RR-080, RR-117, RR-126, RR-128, RR-239, RR-242, RR-248, RR-250, RR-259, RR-303, RR-309</p>	<p>Respondents stated that the project should not be constructed near the Quy Fen SSSI due to potential impacts.</p>	<p>The site selection and consideration of alternatives is presented in ES Chapter 3 Site Selection and Alternatives (App Doc Ref 5.2.3) [AS-018].</p> <p>An assessment of potential impacts and mitigation measures for designated nature conservation sites, including Sites of Specific Scientific Interest, is presented in ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [AS--26].</p> <p>The impact from the construction of the proposed WWTP on Stow-cum-Quy Fen SSSI is assessed as negligible. Combined with a high sensitivity receptor and negligible impact, it would result in a slight adverse effect, which is not significant.</p> <p>The impact of the operational phase on Stow-cum-Quy Fen SSSI would result in a slight adverse effect, which is not significant.</p>
<p>RR-055, RR-138, RR-281, RR-101, RR-172, RR-195, RR-299, RR-270, RR-290, RR-077, RR-186, RR-225, RR-191, RR-093, RR-201, RR-139, RR-</p>	<p>Respondents raised concerns regarding impact to the Wicken Fen Vision.</p>	<p>The landscape proposals set out in the Landscape, Ecological and Recreational Management Plan (LERMP) (App Doc Ref</p>

Reference	Relevant Representation Comment	Applicant's Response
153, RR-169, RR-140, RR-194, RR-183, RR-019, RR-048, RR-163, RR-255, RR-044, RR-070, RR-233, RR-264, RR-167, RR-119, RR-267, RR-296, RR-175, RR-112, RR-118, RR-122, RR-238, RR-124, RR-178, RR-266, RR-284, RR-288, RR-025, RR-109, RR-115, RR-125, RR-177, RR-215, RR-064, RR-071, RR-223, RR-128, RR-144, RR-158, RR-212, RR-137, RR-242, RR-259, RR-134, RR-309		5.4.8.14) [AS-066], have been designed to deliver a minimum of 20% Biodiversity Net gain (BNG) complementing local initiatives such as the Cambridge Nature Network and Wicken Fen Vision).
RR-106	The Applicant has overlooked a second, important assessment undertaken in 2002 by Land Design Associates (LDA). The Applicant includes this "Cambridge Green Belt Study" in its list of references at the end of 7.5.3 - as "SCDC. (2002)" - but surprisingly makes no reference to it in its text.	The Applicant notes this response. The list of references shows the materials which have been used to prepare the Application Document, whether or not they have been directly cited or not within the text.
RR-212	Preference was expressed for the project site to be used for the proposed housing development rather than the relocation of the waste water treatment plant.	A housing development in greenfield locations, where it would take up far more land than the WWTP and be less sustainable in terms of transport emissions. A low-carbon city district can achieve higher densities of housing than housing developed on greenfield or Green Belt sites and achieve a higher proportion of non-car journeys.
RR-167, RR-061, RR-175	Respondents stated that the Application's Green Belt Assessment is not consistent with the Greater Cambridge Green Belt Assessment.	The Applicant has undertaken a Green Belt Assessment (App Doc Ref 7.5.3) [APP-207] the results of which are transparently reported and

Reference	Relevant Representation Comment	Applicant's Response
		<p>summarised in the Applicant's Planning Statement (App Doc Ref 7.5) [APP-204].</p> <p>The assessment applies the methodology used in the Greater Cambridge Green Belt Assessment, which was published in August 2021. It was commissioned by Cambridge City Council (CCC) and South Cambridgeshire District Council (SCDC) to provide an independent and objective assessment of the performance of all Green Belt land across the two authorities which together form Greater Cambridge. The Greater Cambridge Green Belt Assessment will form an important piece of evidence informing the emerging Greater Cambridge Local Plan currently being prepared jointly by CCC and SCDC.</p> <p>At paragraph 2.2.1 of the Applicant's Green Belt Assessment (App Doc Ref 7.5.3) [APP-207], the statement is 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</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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 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.</p> <p>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</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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].</p>

Table 4-2 Project necessity and scheme design

Reference	Relevant Representation Comment	Applicant's Response
RR-049, RR-099, RR-138, RR-142, RR-214, RR-237, RR-280, RR-078, RR-281, RR-072, RR-181, RR-247, RR-291, RR-101, RR-172, RR-304, RR-081, RR-306, RR-216, RR-221, RR-270, RR-290, RR-094, RR-186, RR-240, RR-243, RR-225, RR-205, RR-185, RR-285, RR-045, RR-093, RR-201, RR-244, RR-276, RR-139, RR-169, RR-241, RR-062, RR-148, RR-194, RR-183, RR-135, RR-255, RR-271, RR-044, RR-070, RR-162, RR-233, RR-264, RR-102, RR-146, RR-167, RR-226, RR-046, RR-119, RR-254, RR-267, RR-279, RR-066, RR-069, RR-179, RR-262, RR-058, RR-184, RR-175, RR-272, RR-112, RR-118, RR-122, RR-218, RR-056, RR-068, RR-073, RR-082, RR-087, RR-098, RR-106, RR-107, RR-124, RR-127, RR-150, RR-	<p>Respondents questioned the necessity of the project.</p>	<p>See Section 2.2 of this document which provides details regarding the need for CWWTPRP.</p>

Reference	Relevant Representation Comment	Applicant's Response
168, RR-191, RR-252, RR-263, RR-266, RR-282, RR-288, RR-047, RR-103, RR-109, RR-110, RR-114, RR-123, RR-125, RR-133, RR-147, RR-151, RR-177, RR-187, RR-188, RR-192, RR-197, RR-203, RR-213, RR-217, RR-229, RR-293, RR-297, RR-298, RR-064, RR-080, RR-088, RR-090, RR-096, RR-104, RR-223, RR-126, RR-128, RR-144, RR-157, RR-158, RR-170, RR-173, RR-212, RR-231, RR-239, RR-242, RR-277, RR-022, RR-037, RR-029		
RR-055, RR-156, RR-059, RR-073, RR-109, RR-245, RR-223, RR-144, RR-173, RR-081, RR-221, RR-225, RR-191, RR-139, RR-169, RR-194, RR-070, RR-300, RR-102, RR-167, RR-254, RR-262, RR-061, RR-168, RR-025, RR-071, RR-080, RR-134, RR-037	Respondents believed that as the existing Wastewater site had been recently upgraded, that the project did not need to relocate.	The existing Cambridge WWTP is not being relocated due to operational necessity but rather to vacate the land that the current WWTP is on. Based on the details contained within the draft 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

Reference	Relevant Representation Comment	Applicant's Response
RR-072	<p>The application does not fully explain the cost and time implications concerning the decommissioning, decontamination and demolition of the existing plant.</p>	<p>District Council and Cambridge City Council (RR-004 and RR-002).</p> <p>Table 3-1 within the ES Chapter 2 Project Description (App Doc Ref 5.2.2) [APP-034] sets out the description of the main construction phases and activities including decommissioning which is indicated as being in year 4 of construction. Figure 3.1 within Chapter 2 includes and anticipated programme including decommissioning.</p> <p>The Applicant confirms that the duration of the decommissioning phase of the existing Cambridge WWTP is 6-12 months and is outlined in more detail in ES Chapter 2 Project Description (App Doc Ref 5.2.2) [APP-034] in which there is section 6: Decommissioning.</p> <p>The Applicant also submitted within its DCO Application an Outline Decommissioning Plan (App Doc Ref 5.4.2.3) [AS-051]. This plan is an appendix to the ES and within the relevant technical assessments, the Applicant describes how this phase will be mitigated for any negative impacts.</p> <p>The Applicant considers it is appropriate to exclude demolition of the existing WWTP from</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>the DCO application. 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 Assessment of environmental impacts will be governed by that consenting process.</p>
RR-167	<p>Why is this an Nationally Significant Infrastructure Projects (NSIPs) when it does not meet the requirements of s29 to qualify as a NSIP.</p>	<p>The Project requires development consent by virtue of a direction from the Department for Food, Environment, and Rural Affairs (“DEFRA”) made pursuant to Section 35 the 2008 Act. The direction confirms that the Application is for development which “by itself, is nationally significant” (for the reasons set out in the Annex to the direction) and therefore must be treated as development for which development consent is required. (The direction is dated 18 January 2021 and is appended at Appendix 3 to the Planning Statement (App Doc Ref 7.5) [AS-128].</p> <p>The Applicant sought the direction to eliminate any ambiguity as to whether the Project exceeds the threshold set out in set out in s29(1) of the 2008 and therefore whether it is one which for which development consent is required. That ambiguity arises due to uncertainties in the</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>factors which inform the calculation of “population equivalent” for the purposes of s29(1)(b). In essence, if that calculation includes the treatment of “wet sludge” then the threshold is met, if it does not then it is not. As noted at footnote 4 on page 105 of the Planning Statement (App Doc Ref 7.5) [AS-128], wet sludge is typically 97% waste water having only completed an initial solid screening process prior to transportation to CWWTP.</p> <p>As far as the Applicant is aware there has been no determination on the point through the Courts, and in anticipation of potential arguments in principle being raised as to whether the Project qualified as a NSIP and therefore required development consent, obtained the direction to put the question of whether the Project could be authorised under the 2008 Act beyond doubt. However, whilst the making of the direction therefore provides certainty that CWWTPRP is able to be promoted under the 2008 Act, it does not determine that the project is a “nationally significant infrastructure project” for the purposes of s29(1).</p>
RR-175	No provision was made in both Local Planning Authorities' adopted 2018	Neither Local Plan requires the relocation of the existing WWTP in their policies relating to

Reference	Relevant Representation Comment	Applicant's Response
	<p>Local Plans, the Greater Cambridge emerging Local Plan or the North East Cambridge Area Action Plan for relocation of the Waste Water Treatment Plant to a Green Belt site.</p>	<p>NEC. Policy 15 of the adopted Cambridge Local Plan 2018 identifies the existing Cambridge WWTP site and surrounding area as an '<i>area of major change</i>' 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 Cambridge WWTP is relocated (see Cambridge City Local Plan para. 3.35).</p> <p>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</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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.</p>
RR-175, RR-061	<p>It is believed alternative and compatible sustainable allocations are available to GCP to fulfil the housing requirement as specified within the emerging Local Plan (GC ELP FP 2021) without the need to use of greenfield or green belt above that already in plan or proposed.</p> <p>The NECAAP and Greater Cambridge emerging Local Plan are understood to both be on hold pending the outcome of the DCO, however these draft plans include proposals based on relocation of the existing works but with no corresponding reference to the proposed relocation site</p>	<p>Since the enlarged NECAAP area (from the adopted 2018 Local Plans) is a key component of future pipeline housing and other development supply in the new plan period to 2041, loss of the full development potential of this area is likely to have a significant effect on the Local Plan. The inability to provide housing (and associated community and cultural facilities) would prevent the achievement of the NECAAP aim to rebalance an employment-dominated part of Cambridge, achieving a sustainable mix of housing, work, retail and leisure and reducing the need to travel by exploiting its proximity to sustainable transport infrastructure including the guided busway, Cambridge North Station, cycling infrastructure and walking routes.</p> <p>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</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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.</p> <p>If the existing Cambridge 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.</p> <p>In the absence of the relocation of the existing Cambridge 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.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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.</p>
RR-061	<p>The Greater Cambridge Shared Planning Scoping Opinion response confirms that relocation of the Cambridge WWTP is not a "requirement" of the North-East Cambridge Area Action Plan and must not be referred to as such". This suggests that other options are available for the development of North East Cambridge</p>	<p>Evidence supporting the emerging Greater Cambridge Local Plan (GCLP) is clear that the NEC site is the most sustainable location for strategic scale development available within Greater Cambridge. A critical finding in the climate change evidence that assessed spatial options for the GCLP, which is of key importance in determining the proposed development strategy, is that location is the biggest factor in impacts on carbon emissions, including the quality of access to public, active and low carbon travel modes, plus the need to travel regularly (GCLP Strategic Spatial Options Assessment: Carbon Emissions Supplement, November 2020[1] page 12). The preferred strategy therefore focuses growth at a range of the best performing locations in terms of minimising trips by car as demonstrated by the GCLP Transport Evidence (October 2021)[2]. In terms of non-car mode shares and car trips per</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>dwelling, the Transport Evidence concludes that development at NEC is the best performing location considered (page xviii and section 14.3).</p> <p>The NECAAP Sustainability Appraisal November 2021 records that the HIF business case concluded that even if consolidation into the north eastern portion of the existing site could have been achieved, at best this would release circa 40% of the existing operational area, but the area released would be constrained by operational needs and odour safeguarding, resulting in only 16 hectares of potentially developable land. Due to the odour constraints, development of the released land would only be suitable for industrial or commercial use and the overall quantum enabled would be minimal.</p> <p>The £227m of HIF funding (see App Doc Ref 8.8) is to be used to relocate the existing Cambridge WWTP and for decommissioning works necessary to take the existing plant out of operational use and to surrender its current operational permits, addressing the major market failure to unlock development and allowing, through Cambridge's strong property market and underlying land values, conventional developer funding and planning to deliver the physical, environmental</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>and social infrastructure that will underpin the housing delivery. Without this full HIF funding, the infrastructure scheme will not be delivered and the delivery of 8,350 homes, together with associated mixed uses and infrastructure cannot be realised.</p> <p>The consequences, therefore, of no relocation are likely to be a significant reduction in the potential delivery of homes in NEC contrary to the objectives currently contained within the emerging joint GCLP. Since the enlarged NECAAP area (from the adopted 2018 Local Plans) is a key component of future pipeline housing and other development supply in the new plan period to 2041, loss of the full development potential of this area is likely to have a significant effect on the Local Plan. The inability to provide housing (and associated community and cultural facilities) would prevent the achievement of the NECAAP aim to rebalance an employment-dominated part of Cambridge, achieving a sustainable mix of housing, work, retail and leisure and reducing the need to travel by exploiting its proximity to sustainable transport infrastructure including the guided busway, Cambridge North Station, cycling infrastructure and walking routes.</p>

Reference	Relevant Representation Comment	Applicant's Response
RR-280, RR-052, RR-186, RR-224, RR-175, RR-112, RR-118, RR-122, RR-061, RR-068, RR-082, RR-282	Respondents expressed concern that the Proposed Development would create a precedent for further development on the green belt.	<p>As part of the Development Consent Order (DCO) process the Applicant evidences the special circumstances for building on the Green Belt with the submission of a full assessment of the need of the proposed development in accordance with the National Policy Statement for Waste Water and the national planning policy for Green Belt (as set out in the NPPF), local development plan policies and Cambridgeshire and Peterborough Combined Authority's (CPCA) performance indicators.</p> <p>The consent of the Application would not preclude any subsequent Applications would needing to demonstrate 'very special circumstances' for building on the Green Belt.</p>
RR-151	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.	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

Reference	Relevant Representation Comment	Applicant's Response
		Section 104(3)) decide the Application in accordance with the NPSWW.

Table 4-3 Project Funding

Reference	Relevant Representation Comment	Applicant's Response
RR-044, RR-046, RR-047, RR-056, RR-063, RR-064, RR-071, RR-078, RR-081, RR-089, RR-093, RR-101, RR-112, RR-114, RR-115, RR-131, RR-132, RR-150, RR-153, RR-156, RR-158, RR-162, RR-167, RR-169, RR-172, RR-173, RR-177, RR-185, RR-187, RR-191, RR-194, RR-201, RR-206, RR-217, RR-219, RR-225, RR-231, RR-205, RR-240, RR-247, RR-255, RR-261, RR-262, RR-266, RR-267, RR-272, RR-280, RR-282, RR-290, RR-291, RR-299, RR-300, RR-303, RR-024	Respondents believed that public money from the central government's Housing Infrastructure Fund (HIF) should not be used for the project	<p>The £227m of HIF funding is to be used to relocate the existing Cambridge WWTP and for decommissioning works necessary to take the existing plant out of operational use and to surrender its current operational permits, addressing the major market failure to unlock development and allowing, through Cambridge's strong property market and underlying land values, conventional developer funding and planning to deliver the physical, environmental and social infrastructure that will underpin the housing delivery. Without this full HIF funding, the infrastructure scheme will not be delivered and the delivery of 8,350 homes, together with associated mixed uses and infrastructure cannot be realized.</p> <p>Please see the Funding Statement (App Doc Ref 3.2) [APP-013] for further information regarding the funding of the proposed development.</p>

Reference	Relevant Representation Comment	Applicant's Response
<p>RR-070, RR-119, RR-175, RR-122, RR-056, RR-096, RR-212</p>	<p>Representations state that the economic rationale has been compromised by much higher interest rates and substantial construction cost inflation, meaning the plan is not financially viable.</p>	<p>As stated in paragraph 3.1.9 of the Funding Statement (App Doc Ref 3.2) [AS-013], the Applicant has continued to revise the estimated cost of the Proposed Development to cover market conditions and contingency revisions.</p> <p>In addition, as stated in paragraph 3.1.10 of the Funding Statement (App Doc Ref 3.2) [AS-013], the parties to the HIF Agreement (App Doc Ref 8.8) are committed to working together to secure any additional funding required for the Proposed Development.</p> <p>The Project Partners are committed to meet all Cost Overruns up to 5% of the Maximum Sum (clause 6.6.4). 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 within the Examination Period.</p> <p>In addition, the parties to the GDA (App Doc Ref 8.8) 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 arising from the change of use of the NEC/Hartree to a residential led development. This is set out in the Recycling Strategy included at Part 2 of Schedule 6 of the GDA.</p>

Reference	Relevant Representation Comment	Applicant's Response
RR-200	It is controversial to channel £227m public funding to benefit a regulated, monopoly business, and even worse, help it develop unregulated real-estate business at zero land cost with guaranteed profits. Will the profit coming from the real-estate redevelopment of Cowley Road land be considered regulated income or unregulated income?	Please see the Funding Statement (App Doc Ref 3.2) [APP-013] for information regarding the funding of the proposed development.
RR-192	We're questioning the whole principle of relying on statutory powers when AW will be significantly benefiting from this relocation - there is no transparency about the scheme at this juncture. We assume that a detailed costing has been prepared in order to have secured the provisional funding although this has not been shared.	Please see the Funding Statement (App Doc Ref 3.2) [APP-013] for information regarding the funding of the proposed development.
RR-212	The land on which CWWTP currently sits is co-owned by Cambridge City Council and Anglian Water. Can one surmise	Please see the Funding Statement (App Doc Ref 3.2) [APP-013] for information regarding the funding of the proposed development.

Reference	Relevant Representation Comment	Applicant's Response
	<p>then, that Anglian Water may have been 'politically influenced' to acquiesce to a move endorsed by CCC? It must be a matter of public record how much the land is sold for, to whom and the conditions of that sale/lease to a developer. One could argue that commercial confidentiality should not apply here (morally at least) given the clear conflict of interests given CCC as landowner and the influence they would carry over planning consent, even if placed outside of their immediate jurisdiction.</p>	<p>Section 2.2 of this document sets out the needs case of the relocation of the existing Cambridge WWTP.</p> <p>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.</p>
<p>RR-194, RR-225, RR-262, RR-212</p>	<p>Some respondents suggested that there is a conflict of interest between the Applicant and SCDC and CCC. The representations state that this conflict of interest is due to the financial interest in the redevelopment and joint-ownership of the land that the current WWTP is sited.</p>	<p>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.</p>

Table 4-4 Cumulative impacts

Reference	Relevant Representation Comment	Applicant's Response
<p>RR-304, RR-225, RR-191, RR-230, RR-196, RR-070, RR-167, RR-200, RR-046, RR-179, RR-112, RR-168, RR-121, RR-235, RR-212, RR-239</p>	<p>Respondents stated that the new Marleigh Development and community will be negatively impacted.</p> <p>Some stated that the site selection process has not adequately considered the impact of the relocation to the Marleigh community because the process proceeded the Marleigh residents moving in.</p>	<p>The applicant applied a rigorous 4-stage site selection process considering alternative sites. On balance, the chosen site was found to perform best across a range of key assessment criteria and opportunities for delivering enhancements. A description of the site selection process and the alternatives which have been considered can be found within ES Chapter 3: Site Selection and Alternatives (App Doc Ref 5.2.3) [AS-018].</p> <p>In relation to the environmental assessment the Applicant refers to the Scoping Report (App Doc Ref 5.4.4.2) [APP-080] Section 5.4 which explains how a future baseline is considered in Environmental Impact Assessment.</p> <p>The identification of future baseline conditions involves predicting changes that are likely to happen in the intervening period between the preparation of the EIA and construction/operation of the Proposed Development, for reasons unrelated</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>to the Proposed Development. Different future baselines may exist for different assessment years during the construction and Operational Phases. This will entail taking current conditions and committed development into consideration and using experience and professional judgment.</p> <p>Developments proposed to be within the future baseline are set out in Table 5-5 alongside cumulative schemes, in order to make this distinction clear, and shown on Figure 5-2 in Section 5.5. These include up to 1300 dwellings, school, food store, community and open spaces, Marleigh.</p>
RR-151	<p>The Applicant failed to include a proper assessment of a 'reasonable alternative', namely the retention and consolidation of the WWTP on the existing site, in the Environmental Statement, which means the ES does not meet the requirements in Schedule 4 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.</p>	<p>The process of site selection and consideration of alternatives is summarised in application document 5.2.3 ES Chapter 3 Site Selection and Alternatives (App Doc Ref 5.2.3) [AS-018].</p> <p>At the strategic level, two main alternatives to relocation were considered; (a) a "do nothing" approach to the NEC area, leaving the NEC area undeveloped or (b) the potential to co-locate housing and commercial development either alongside the existing treatment works either in their current form or on a consolidated footprint.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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.</p> <p>As discussed in the Planning Statement (App Doc Ref 7.5) [AS-128] 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.</p> <p>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.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The NECAAP Sustainability Appraisal November 2021 records that the HIF business case concluded that even if consolidation into the north eastern portion of the existing site could have been achieved, at best this would release circa 40% of the existing operational area, but the area released would be constrained by operational needs and odour safeguarding, resulting in only 16 hectares of potentially developable land. Due to the odour constraints, development of the released land would only be suitable for industrial or commercial use and the overall quantum enabled would be minimal.</p> <p>The NECAAP Sustainability Appraisal November 2021 concludes that the option of "consolidation on site is not considered to be deliverable or viable and is therefore not considered to be a reasonable alternative".</p>
RR-203, RR-191	Respondents questioned if there is a compensation scheme for residents potentially affected by the proposed development.	If a stakeholder believes there has been a reduction in the value for their property as a result of the Proposed Development, they have the right to submit a claim relating to the construction of the Proposed Development (under section 10 of the Compulsory Purchase Act 1965) or, in relation to the operation of the Proposed Development, one year after the

Reference	Relevant Representation Comment	Applicant's Response
		scheme has opened (Part 1 of the Land Compensation Act 1973). The Applicant will assess any claim submitted in accordance with the Compensation Code.

Table 4-5 Odour

Reference	Relevant Representation Comment	Applicant's Response
RR-055, RR-281, RR-181, RR-101, RR-172, RR-081, RR-221, RR-077, RR-186, RR-225, RR-205, RR-185, RR-093, RR-196, RR-244, RR-153, RR-062, RR-194, RR-255, RR-070, RR-162, RR-300, RR-146, RR-167, RR-200, RR-224, RR-046, RR-119, RR-069, RR-164, RR-065, RR-112, RR-118, RR-122, RR-238, RR-301, RR-054, RR-059, RR-111, RR-124, RR-150, RR-190, RR-269, RR-288, RR-292, RR-109, RR-110, RR-114, RR-151, RR-197, RR-203, RR-256, RR-275, RR-297, RR-080, RR-104, RR-132, RR-144, RR-157, RR-231, RR-273, RR-309, RR-024, RR-037, RR-029	Respondents were concerned regarding the impact of odour from the new site on the local community. Specific mention was made to Fen Ditton Primary School and nearby dwellings.	<p>The Applicant has undertaken its assessment of odour impacts in line with the Institute of Air Quality Management (IAQM) guidance. It is impossible to name every receptor. As such, those closest to the site is named as the impact to those will be the most severe. Receptors closer to those mentioned in this question were named. It can be confirmed that as the roads mentioned are classified as 'low' sensitivity, compared with e.g. the Fen Ditton Primary School which was named and which is classified as 'high' sensitivity, the result would remain "negligible impact".</p> <p>The Applicant confirms that there have been further design developments to mitigate odour, including there now being only one filtered vent shaft. Further modelling information is also</p>

Reference	Relevant Representation Comment	Applicant's Response
		available in ES Chapter 18 Odour (App Doc Ref 5.2.18) [APP-050].
RR-191	If Anglian Water is so confident that its neighbours will not be impacted by odours or operations, is there a clear compensation scheme?	The stakeholder has the right to submit a claim relating to the operation of the Proposed Development one year after the scheme has opened (Part 1 of the Land Compensation Act 1973). The Applicant will assess any claim submitted in accordance with the Compensation Code.

Table 4-6 Carbon

Reference	Relevant Representation Comment	Applicant's Response
RR-055, RR-237, RR-249, RR-261, RR-078, RR-219, RR-307, RR-072, RR-181, RR-247, RR-291, RR-101, RR-172, RR-299, RR-304, RR-081, RR-306, RR-089, RR-270, RR-290, RR-052, RR-084, RR-225, RR-205, RR-230, RR-045, RR-093, RR-196, RR-201, RR-276, RR-139, RR-169, RR-241, RR-062, RR-140, RR-148, RR-194, RR-199, RR-305, RR-183, RR-048, RR-135, RR-255, RR-271, RR-044, RR-070, RR-264, RR-300, RR-167, RR-224, RR-108, RR-119, RR-254, RR-267, RR-179, RR-262, RR-067, RR-156, RR-180, RR-079, RR-152, RR-065, RR-074, RR-112, RR-118, RR-258, RR-056, RR-059, RR-073, RR-082, RR-107, RR-124, RR-127, RR-190, RR-191, RR-206, RR-252, RR-257, RR-263, RR-266, RR-269, RR-286, RR-	Respondents expressed concerned about the carbon impact of the project.	ES Chapter 10 Carbon (App Doc Ref 5.2.10) [APP-042] provides calculations and an impact assessment of the carbon emissions for the construction of the Proposed Development (including embedded carbon in materials), land use changes (the net impact of land permanently required for the Proposed Development) and the operation of the Proposed Development. Two different options have been assessed for operation, the preferred Option where biogas generated by the Proposed Development is exported to the UK gas grid and the alternative option where where biogas generated by the Proposed Development

Reference	Relevant Representation Comment	Applicant's Response
<p>288, RR-109, RR-110, RR-114, RR-115, RR-121, RR-147, RR-151, RR-182, RR-192, RR-213, RR-215, RR-217, RR-298, RR-051, RR-060, RR-071, RR-080, RR-086, RR-096, RR-223, RR-116, RR-126, RR-128, RR-145, RR-170, RR-189, RR-212, RR-231, RR-137, RR-239, RR-248, RR-250, RR-259, RR-273, RR-303, RR-309</p>		<p>is used in efficient combined heat and power engines.</p> <p>Under the Preferred Option scenario, the assessment lifetime impact has been calculated as net negative carbon emissions (-35,380 tCO₂e) based on the anticipated export of gas to grid during operation.</p> <p>The alternative Proposed Development scenario of using biogas in CHP is estimated to have overall net carbon emissions over the assessment life of 68,430 tCO₂e. The net operational carbon emissions under this scenario would be offset through a Carbon Management Plan (Requirement 22 in Schedule 2 of the Development Consent Order, App Doc Ref 2.1), to ensure that Anglian Water's commitment to an operationally net zero project would be met under all circumstances.</p> <p>Good practice construction measures to reduce GHG emissions have been recommended in the CoCP Part A and CoCP Part B (Appendix 2.1 and 2.2) (App Doc Refs 5.4.2.1 and 5.4.2.2) [APP-068 and AS-161]. Reductions in construction emissions of just under 50% have been made between the assessment of the baseline design</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>when compared to the Proposed Development. Further design optimisation opportunities are being investigated.</p>
<p>RR-055, RR-109, RR-212</p>	<p>Representations stated that the carbon assessments undertaken as part of the environmental statement is incorrect. The representations claim that the decommissioning of the existing plant should be included in the assessment.</p>	<p>The Applicant considers it is appropriate to exclude demolition of the existing WWTP from the DCO application. 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 Assessment of environmental impacts will be governed by that consenting process.</p> <p>ES Chapter 10 Carbon (App Doc Ref 5.2.10)[APP-042] includes calculations and an impact assessment of the carbon emissions for the decommissioning of the existing facility (see Section 4.5).</p> <p>The Applicant is working with the master developers of the existing Cambridge WWTP to help them understand what assets and infrastructure will remain in place.</p>

Table 4-7 Water Resources

Reference	Relevant Representation Comment	Applicant's Response
RR-138, RR-249, RR-281, RR-219, RR-072, RR-181, RR-291, RR-101, RR-172, RR-193, RR-195, RR-299, RR-304, RR-089, RR-290, RR-077, RR-092, RR-240, RR-243, RR-225, RR-205, RR-251, RR-185, RR-093, RR-201, RR-139, RR-153, RR-131, RR-169, RR-062, RR-194, RR-019, RR-163, RR-165, RR-255, RR-271, RR-044, RR-129, RR-162, RR-233, RR-264, RR-224, RR-226, RR-046, RR-204, RR-254, RR-267, RR-149, RR-180, RR-065, RR-074, RR-112, RR-118, RR-258, RR-056, RR-068, RR-124, RR-127, RR-168, RR-178, RR-190, RR-191, RR-232, RR-252, RR-266, RR-284, RR-288, RR-100, RR-105, RR-109, RR-110, RR-114, RR-121, RR-123, RR-151, RR-177, RR-182, RR-197, RR-215, RR-217, RR-220, RR-228, RR-275, RR-051, RR-060, RR-064, RR-071, RR-080, RR-096, RR-223, RR-116, RR-126, RR-128, RR-157, RR-158, RR-170, RR-189, RR-137, RR-242, RR-250, RR-259, RR-287, RR-303, RR-309, RR-025	Respondents expressed concern regarding the impact on water supplies due to the project being built above the 'principal chalk aquifer'	<p>Paragraphs 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.</p> <p>Paragraph 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.</p> <p>The monitoring within the landscape masterplan area will be undertaken to</p>

Reference	Relevant Representation Comment	Applicant's Response
		document the recovery of groundwater levels following dewatering during construction, and to compare the pre- and post-construction groundwater conditions. In addition, and in response to consultation responses, the Applicant has prepared an Outline Water Quality Monitoring Plan in conjunction with the Environment Agency. This additional document will be included in the Applicant's submission at Deadline 2.
RR-212	Assurances must therefore be given that pollution of nearby land and ditches is prevented and no escape of sewage could occur during the transfer of sewage from Waterbeach or from the current CWWTP.	Contaminant risk through the management of construction activities are described within the Code of Construction Practice (CoCP) Part A and B (Appendix 2.1 and 2.2 App Doc Ref 5.4.2.1 and 5.4.2.2) [APP-068 and AS-161] in particular section 4.4 which requires the Principal Contractor(s) to produce a Water Quality Management Plan(s), Pollution Incident Control Plan, and risk assessments before works commence on site.
RR-130	What is the likelihood and risk that storm sewer and Combined Sewers will over flow? Where is the analysis to show minimisation of likelihood and risk?	<p>There will be no CSO retained at the existing Cambridge WWTP and no new CSO included at the Proposed Development.</p> <p>There is one CSO in the existing Cambridge WWTP catchment, namely Riverside CSO. The existing network has been modelled for up to a 1:100 year storm event, plus 40% climate</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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.</p> <p>The advantage and additional protection associated with the proposed WWTP, additional to the existing Cambridge WWTP, is the attenuation of the flows whilst proceeding down the approximately 2.4km and internal diameter of 2.4m transfer tunnel. This provides additional storage of flows to ensure a 1:100 year storm (+ 40% climate change allowance) can be accommodated. The result is that less storm events will be experienced at the Proposed WWTP and less discharges to the river (none predicted through the UPM equivalent modelling).</p> <p>More information can be found in ES Chapter 2 Project Description (App Doc Ref 5.2.2) [AS-034], section 2.3, on storm management, as well as ES Chapter 20 Appendix 20.10 Storm model report (App Doc Ref 5.4.20.10) [APP-160] for the modelling report, regarding some of the analysis.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>More information can be found in ES Chapter 20 Water Resources (App Doc Ref 5.2.20) [AS-040] regarding minimisation of likelihood and risk for the receiving watercourse perspective as well.</p>
RR-068	<p>How can building a Waste Water Treatment Plant on an elevated position, be a sound solution? All waste water will have to be pumped up to the new plant. No matter how many fail safe devices are installed, at some point these will fail. Being on an elevated position, there is a major risk of the waste water backing up in the city with irreplaceable or costly damage to the city.</p>	<p>The sewer network is designed to drain by gravity to the existing Cambridge and proposed WWTPs, with regional pumping stations lifting flows (from those areas that cannot drain naturally) up and into the network. At the WWTP, a terminal pumping station (TPS) lifts the flows into the WWTP for treatment. The TPS at both the Existing and Proposed WWTPs are equipped with a number of pumps for pumping flow to treatment, and during intense rain events, pumping flows to storm management. Standby pumps are included, should pumps fail. Additionally, the site has 2No. power supplies. Should one fail, the other would still be able to supply power. Should no power be available, standby diesel generators can be connected to provide a power supply to ensure the catchment is protected.</p> <p>This approach is not unique to Cambridge, and numerous catchments across the world operate on the above basis. Over the last 20</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>years, only 2No. events occurred at the Existing WWTW where the no power was available. In both these incidents there was adequate retention time in the existing tunnel to allow AWS operations and/or the network operator sufficient time to respond to the incident and rectify it to prevent flooding. The advantage and additional protection associated existing Cambridge WWTP, is the attenuation of the flows whilst proceeding down the approximately 2.4km and internal diameter of 2.4m transfer tunnel. This provides additional storage of flows to ensure a 1:100 year storm (+ 40% climate change allowance) can be accommodated. The result is that less storm events will be experienced at the Proposed WWTP and less discharges to the river (none predicted through the UPM equivalent modelling).</p> <p>Furthermore, standby generators will be included permanently on site at the proposed WWTP.</p>

Table 4-8 Consultation

Reference	Relevant Representation Comment	Applicant's Response
	<p>Some responses stated that the community were misled during consultation regarding the needs case of the project. This is in regards to housing compared to Wastewater capacity.</p>	<p>The needs case during the pre-application consultation materials was explicit as creating additional space for housing.</p> <p>Examples of pre-application consultation materials that state the needs case can be found in the following.</p> <ul style="list-style-type: none"> • Phase Three (Statutory Phase Two) Section 47 Community Consultation Materials (App Doc Ref 6.1.20) [APP-185] • Section 47 Community Consultation Materials (App Doc Ref 6.1.17) [APP-181] • Phase One (Non-statutory) Consultation Materials (App Doc Ref 6.1.12) [APP-176]
	<p>Some responses argued that consultations should not have been undertaken during the COVID-19 pandemic and associated lockdowns. They believe that this led to an inadequate quality of consultation</p>	<p>The pre-application consultation met and exceeded the requirements of the 2008 Planning Act and took into account the relevant advice and guidance published by the Planning Inspectorate and UK Government.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The Applicant adapted to the Government's restrictions to social contact and gatherings owing to the COVID-19 pandemic and made available its consultation materials and feedback channels by way of a bespoke virtual exhibition space and digital engagement platform, as well as hosting several community and stakeholder webinars. These measures were implemented for Phase One consultation and applied for all consultation phases, even when COVID-19 restrictions were eased.</p> <p>The Applicant's contact lines included a phone number, an email address, and a freepost service. These information lines were open through consultation and remain open. During the pre-application consultation, these contact lines were available for any questions or requests for hard copy materials.</p> <p>For more information regarding the pre-application consultation please see the Consultation Report (App Ref Doc. 6.1) [AS-115].</p>
RR-167	The reach of the consultation was inadequate and did not notify all those affected. The consultation website was	The pre-application consultation met and exceeded the requirements of the 2008 Act and took into account the relevant advice and

Reference	Relevant Representation Comment	Applicant's Response
	<p>difficult to use on each consultation, and it confused and put off a significant number of would-be respondents or limited what they managed to say.</p>	<p>guidance published by the Planning Inspectorate and UK Government.</p> <p>Under Section 47 of the 2008 Act, the Applicant developed a draft Statement of Community Consultation (SoCC) and consulted on this from 18 February – 19 March 2021 with Cambridgeshire County Council, South Cambridge District Council, Cambridge City Council, and East Cambridgeshire District Council. In response to the comments received, the Applicant made changes to the SoCC as set out in Table 5-2 of the Consultation Report (Doc Ref 6.1) [AS-115]. Consultation was carried out in accordance with the commitments set out in the final SoCC, as demonstrated in the SoCC-Compliance Checklist (App Doc Ref 6.1.9) [APP-173].</p> <p>The Applicant adapted to the Government's restrictions to social contact and gatherings owing to the COVID-19 pandemic and made available its consultation materials and feedback channels by way of a bespoke virtual exhibition space and digital engagement platform, as well as hosting several community and stakeholder webinars. These measures</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>were implemented for Phase One consultation and applied for all consultation phases, even when COVID-19 restrictions were eased.</p> <p>The Applicant's contact lines included a phone number, an email address, and a freepost service. These information lines were open through consultation and remain open. During the pre-application consultation, these contact lines were available for any questions or requests for hard copy materials.</p>

Table 4-9 Visual impact

Reference	Relevant Representation Comment	Applicant's Response
<p>RR-044, RR-046, RR-053, RR-070, RR-072, RR-085, RR-093, RR-100, RR-102, RR-270, RR-109, RR-110, RR-114, RR-121, RR-124, RR-138, RR-139, RR-144, RR-146, RR-148, RR-152, RR-167, RR-178, RR-185, RR-201, RR-024, RR-204, RR-212, RR-215, RR-228, RR-175, RR-235, RR-242, RR-243, RR-246, RR-253, RR-264, RR-266, RR-267, RR-274, RR-284, RR-288, RR-292, RR-297, RR-300, RR-304, RR-305, RR-309</p>	<p>Representations expressed concern regarding the visual impact of the project. Especially in regard to the flat landscape. The approach to the city from the East was highlighted as a specific viewpoint.</p>	<p>A full assessment of Visual impacts is set out in Chapter 15 of the ES Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034].</p> <p>The Applicant during the Consultation process responded to comments that the earth bank height should be reduced to limit the impact to the area and adapted the design that lowered a number of the larger structures within the proposed WWTP. The height of the earth bank was also reduced to reflect the amount of spoil that will be available to create</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>it from a sustainable resource. More tree planting was introduced to further improve this reduction.</p>
<p>RR-072, RR-089, RR-243, RR-139, RR-264, RR-300, RR-224, RR-156, RR-112, RR-059, RR-107, RR-109, RR-080, RR-117, RR-126, RR-212, RR-134, RR-061, RR-127, RR-206, RR-116</p>	<p>Representations stated that the site should not have been chosen as the towers cannot be sunk due to the principal chalk aquifer.</p>	<p>The Applicant applied a rigorous 4-stage site selection process considering alternative sites. On balance, the chosen site was found to perform best across a range of key assessment criteria and opportunities for delivering enhancements. A description of the site selection process and the alternatives which have been considered can be found within ES Chapter 3 Site Selection and Alternatives (App Doc Ref 5.2.3) [AS-018].</p> <p>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 consideration 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.</p>
<p>RR-178</p>	<p>Artists impressions do not show the 4 chimneys, the height of Electricity Pylons which dominate the site and surrounding open countryside.</p>	<p>The ES Chapter 15 Appendix Photomontages (doc ref 15.1) [APP-127] provides seven different viewpoints of the visual representation of development proposals.</p>

Reference	Relevant Representation Comment	Applicant's Response
RR-212	<p>"Insofar as I am aware, only a 5m bund is proposed to 'disguise' the plant in general, and there is no written indication that mature trees (which are costly both to purchase and transport) will be planted to help mitigate the issue. Whatever is done in this regard would not stop the plumes of burning gases from the towers being noticed from all around the local area either."</p>	<p>These representations include the visible infrastructure of the proposed development.</p> <p>The Applicant during the Consultation process responded to comments that the earth bank height should be reduced to limit the impact to the area and adapted the design that lowered a number of the larger structures within the proposed WWTP. The height of the earth bank was also reduced to reflect the amount of spoil that will be available to create it from a sustainable resource. More tree planting was introduced to further improve this reduction.</p> <p>As illustrated on drawing Sheet 11 of Works Plans (App Doc Ref 4.3) [AS-150], an area has been set aside within the earth bank for 'future works'. The Applicant is satisfied there is sufficient space within the proposed earth bund to upgrade the works to treat approximately 600,000PE, using existing technologies and assuming there are no significant changes to permitted requirements.</p> <p>In Appendix 15.1: The photomontages assumed the following planting sizes based on the plant size at the time of planting and</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>potential growth rates: In year 1, mitigation planting is shown at planting size. In year 15, mitigation planting is shown between 5 - 7.5m high for woodland, 7.5 - 10m high for trees and 2 - 3m high for hedgerows. Heights vary depending on the location of planting. Semi-mature trees (5m or taller at the time of planting) and extra heavy standard trees (4.5 – 6.00m high at the time of planting) were assumed to have reached 10m high after 15 years. The planting sizes are given on Figure 3.9 Proposed Habitat Areas in the LERMP.</p> <p>Under normal operation, there would be no readily discernable plume from the WWTP boiler stack. As such, this is not addressed in the LVIA.</p>
RR-061	No information appears to be provided in either the Lighting Design Strategy or the Lighting Assessment Report for the workshop	<p>Table 4-1: Worst case lighting requirements summary within the Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100] details lighting for the workshop building entry points as follows.</p> <ol style="list-style-type: none"> 1. Visitors car park at proposed WWTP - Other lighting requirements: 20 Lux at office/workshop building entry points, mounted on building at

Reference	Relevant Representation Comment	Applicant's Response
		<p>5m above ground level, controlled via PIR sensor with manual override.</p> <p>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.</p> <p>Operations staff would travel around the site after dark guided by their vehicle headlights.</p>

Table 4-10 Impact of heritage assets

Reference	Relevant Representation Comment	Applicant's Response
RR-044, RR-058, RR-072, RR-081, RR-085, RR-093, RR-120, RR-138, RR-139, RR-145, RR-146, RR-167, RR-177, RR-194, RR-207, RR-224, RR-233, RR-235, RR-242, RR-256, RR-258, RR-259, RR-267, RR-280, RR-281, RR-037, RR-029	Representations expressed concern for the potential impact on historical features and listed buildings. This included Biggin Abbey.	<p>The applicant has undertaken an assessment of historic environment impact, including on Biggin Abbey which are detailed in ES Chapter 13 (App Doc Ref 5.2.13) [AS-030] and Appendix 13.1 (App Doc Ref 5.4.13.1) [AS-079].</p> <p>The assessment of effects of the proposed WWTP on the historic environment follows the methodology set out in ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) [AS-030] and Appendix 13.1 Historic Environment Baseline (App Doc Ref 5.4.13.1)</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>[AS-079] Historic Environment Baseline. The effect on the Historic Environment has been professionally assessed in respect to all relevant guidance, including Historic England (2017) GPA 3 The Setting of Heritage Assets.</p>
RR-146, RR-037	<p>Representations expressed concern about the historical Roman population and the archaeological importance.</p>	<p>The Applicant describes in ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) [AS-030] and Appendix 13.1 Historic Environment Baseline (App Doc Ref 5.4.13.1) [AS-079], the potential for Roman remains within the scheme order limits. Particular attention has been paid to the potential for Roman remains relating to the Horningsea kilns site, Car Dyke and known areas of Roman activity around Clayhithe. Archaeological survey has identified limited potential for Roman remains within the site of the proposed WWTP. However, the area will be subject to an agreed archaeological mitigation investigation strategy to appropriately investigate and record remains.</p>
RR-167	<p>Representations expressed concern on the degree of cumulative harm on the Grade 2* Biggin Abbey.</p>	<p>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).</p> <p>The applicant has understood cumulative</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>effects as those which consider both the impact of the proposed development and that of other factors, such as committed developments, which may together result in greater or differing impact to an asset than the proposed development considered alone.</p> <p>Each asset within the study area has been subject to an individual assessment of impact and harm, including the assets here listed and the conservation areas which contain many of them. This assessment methodology is described in ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) [AS-030]. Cumulative impact is assessed in ES Chapter 22: Cumulative Effects Assessment (App Doc Ref 5.2.22) [AS-044], for all topic areas including historic environment.</p>

Table 4-11 PRoWs/ Recreation

Reference	Relevant Representation Comment	Applicant's Response
RR-055, RR-138, RR-237, RR-249, RR-186, RR-225, RR-191, RR-140, RR-162, RR-167, RR-036, RR-207, RR-164, RR-262, RR-095, RR-258, RR-061, RR-107, RR-191, RR-227, RR-109, RR-121, RR-188, RR-197, RR-245, RR-080, RR-113, RR-	Representations expressed concern of the impact on cycle paths. Special mention was made to the use of cycle paths by children to get to school.	In the Construction Transport Management Plan (CTMP) (App Doc Ref 5.4.19.7) [AS-109] Section 6.9, it outlines how the Applicant will facilitate safe movement of users of the highway which requires maintaining the existing footway / cycleway to the west of the

Reference	Relevant Representation Comment	Applicant's Response
116, RR-117, RR-173, RR-231, RR-273, RR-134, RR-309		Horningsea Road carriageway at all times with suitable barriers separating the footway from the works.
RR-044, RR-019, RR-070, RR-074, RR-095, RR-101, RR-107, RR-113, RR-115, RR-127, RR-137, RR-141, RR-163, RR-164, RR-172, RR-186, RR-191, RR-195, RR-197, RR-201, RR-207, RR-208, RR-210, RR-245, RR-246, RR-249, RR-259, RR-266, RR-267, RR-284, RR-037	Representations stated concern regarding the impact on public rights of way and permissive ways.	<p>During construction, a number of public rights of way (PRoW) would be affected by the construction of the Waterbeach pipeline, the transfer tunnel and the proposed WWTP. Measures (such as diversions or safety access gates) will be put in place to manage the impact upon users of the PRoW during the construction period:</p> <ul style="list-style-type: none"> - Where practical and feasible, continued access to and the use of PRoW, will be facilitated in order to minimise the number of diversions required. Safety access gates will be put in place and users allowed to safely cross the construction working area. - Where this is not feasible or would create a safety issue, the PRoW will either be temporarily diverted or if this is not possible, temporarily stopped up. Details of diversions are shown on the Rights of Way Plans (App Doc Ref 4.6) [AS-153]. <p>These measures have been outlined within the Code of Construction Practice (CoCP) Part A and Part B (App Doc Ref 5.4.2.1 and 5.4.2.2) [APP-068 and AS-161] and have been put in place to minimise impacts to users of PRoW.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>The CoCP Part A (App Doc Ref 5.4.2.1) [APP-068], Section 3 'Community & Stakeholder Engagement' states that the Applicant will adopt a proactive approach to communication with the local community and stakeholders in order to keep them informed of the works taking place, including durations, particularly where the works would impact infrastructure such as PRow.</p> <p>All PRow will be restored to the same condition as before the works took place or to a standard which is acceptable to the Local Highway Authority.</p> <p>In operation, new footpaths and bridleways would be created as part of a new circular walking route. This includes the creation of a new bridleway between Low Fen Drove Way and Station Road.</p>
RR-072, RR-193, RR-186, RR-225, RR-191, RR-037, RR-062, RR-140, RR-194, RR-183, RR-211, RR-233, RR-102, RR-167, RR-036, RR-108, RR-204, RR-254, RR-164, RR-112, RR-061, RR-023, RR-106, RR-107, RR-127, RR-143, RR-029, RR-266, RR-284, RR-288, RR-308, RR-109, RR-110, RR-115, RR-177, RR-182, RR-064, RR-080, RR-116, RR-117, RR-128, RR-157, RR-158, RR-212, RR-239, RR-242, RR-248	Representations stated that the project would lead to the loss of a recreational area. This area was reported as important to physical and mental health.	The Applicant has prepared the ES Appendix 12.3 Mental Wellbeing Impact Assessment (MWIA) (App Doc Ref 5.4.12.3) [AS-077], which does not recommend further Mental Wellbeing Impact Assessments. Comments or recommendations are set out in section 4 of ES Appendix 12.3 Mental Wellbeing Impact Assessment (MWIA) (App Doc Ref 5.4.12.3) [AS-077].

Reference	Relevant Representation Comment	Applicant's Response
		<p>Some of 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]. The social benefits are highlighted through the following.</p> <ul style="list-style-type: none"> • 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 proposed WWTP) • Enhancing recreational opportunities (formalising recreational access and providing wider connectivity through new and enhanced public rights of way) <p>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.</p>
RR-207	The plans show destruction/loss or disruption of footpaths all around the village, north, south, east and west.	During construction, a number of public rights of way (PRoW) will be affected by the construction of the Waterbeach pipeline, the

Reference	Relevant Representation Comment	Applicant's Response
	<p>The footpaths across the fields at Biggin Abbey are marked as a site for construction parking as well as excavation. For the years of construction - and probably thereafter - these footpaths will be disrupted or destroyed.</p>	<p>transfer tunnel and the proposed WWTP. Measures (such as diversions or safety access gates) will be put in place to manage the impact upon users of the PRow during the construction period, as follows.</p> <ul style="list-style-type: none"> - Where practical and feasible, continued access to and the use of PRow, will be facilitated in order to minimise the number of diversions required. Safety access gates will be put in place and users allowed to safely cross the construction working area. - Where this is not feasible or would create a safety issue, the PRow will either be temporarily diverted or if this is not possible, temporarily stopped up. Details of diversions are shown on the Rights of Way Plans (App Doc Ref 4.6) [AS-017]. <p>These measures have been outlined within the Code of Construction Practice (CoCP) Part A and Part B (App Doc Ref 5.4.2.1 and 5.4.2.2) [APP-068 and AS-161] and have been put in place to minimise impacts to users of PRow. The CoCP Part A (App Doc Ref 5.4.2.1) [APP-068], Section 3 'Community & Stakeholder Engagement' states that the Applicant will adopt a proactive approach to communication</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>with the local community and stakeholders in order to keep them informed of the works taking place, including durations, particularly where the works would impact infrastructure such as PRow. All PRow will be restored to the same condition as before the works took place or to a standard which is acceptable to the Local Highway Authority. In operation, new footpaths and bridleways would be created as part of a new circular walking route. This includes the creation of a new bridleway between Low Fen Drove Way and Station Road.</p>

Table 4-12 Traffic

Reference	Relevant Representation Comment	Applicant's Response
RR-044, RR-019, RR-046, RR-054, RR-057, RR-058, RR-059, RR-062, RR-063, RR-065, RR-068, RR-069, RR-070, RR-072, RR-074, RR-077, RR-RR-080, RR-082, RR-084, RR-085, RR-092, RR-093, RR-095, RR-101, RR-106, RR-107, RR-223, RR-276, RR-109, RR-110, RR-111, RR-112, RR-113, RR-114, RR-115, RR-116, RR-118, RR-127, RR-129, RR-138, RR-140, RR-146, RR-151, RR-153, RR-154, RR-155, RR-156, RR-157, RR-162, RR-164, RR-167, RR-168, RR-169, RR-172, RR-174, RR-177, RR-178, RR-179, RR-180, RR-181, RR-183, RR-185, RR-186, RR-188, RR-189, RR-196, RR-197, RR-199, RR-200, RR-201, RR-202, RR-203, RR-204, RR-207, RR-212, RR-215, RR-217, RR-220, RR-221, RR-224, RR-225, RR-227, RR-231, RR-205, RR-233, RR-234, RR-235, RR-238, RR-243, RR-244, RR-245, RR-249, RR-251, RR-252, RR-255, RR-257, RR-258, RR-264, RR-266, RR-269, RR-271, RR-272, RR-273, RR-274, RR-280, RR-281, RR-282, RR-284, RR-285, RR-286, RR-287, RR-288, RR-290, RR-295, RR-297, RR-301, RR-303, RR-305, RR-309, RR-036, RR-029, RR-024, RR-026	Representations were critical of the potential impact of construction and operational traffic.	<p>The Applicant acknowledges the concerns regarding increased traffic and wishes to provide assurances that the impacts of construction and operational traffic have been carefully considered within the design and traffic managements measures for the Proposed Development.</p> <p>Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] requires a Construction Traffic Management Plan, for each phase of the development, to be submitted and approved alongside the Construction Environmental Management Plan for that phase.</p> <p><u>Construction Traffic</u> Appendix 19.7 Construction Traffic Management Plan (CTMP) (Doc 5.4.19.7) [AS-109] has been prepared to outline the traffic management measures to be implemented across the Proposed Development during the construction phase. Measures to reduce the impact of construction on the A14 and surrounding roads include the following.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<ul style="list-style-type: none"> • Specified arrival and departure routes for construction traffic as set out in Section 4.1, Table 4-1 of the CTMP which avoid routing through local roads where possible. • All deliveries to be planned outside of peak hours (8am-9am, 3-4pm and 5-6pm Monday to Friday), unless it is determined to be essential that the delivery is to be completed during these hours (Section 4.2, Paragraph 4.2.5 and Section 6.4 of the CTMP). • Commitment and compliance with safety measures and requirements for the Fleet Operator Recognition Scheme (FORS) and Construction Logistics & Community Safety (CLOCS) (Section 6.2 of the CTMP). • Temporary speed restrictions to Horningsea Road will be put in place in accordance with the Temporary Traffic Regulation Order set out in Article 16 of the dDCO (Doc 2.1) [AS-139] for the duration of the works (Section 6.9, Paragraph 6.9.3 of the CTMP). <p>The CTMP is an outline plan which will be developed further in collaboration with stakeholders to ensure it continues to reflect</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>any concerns raised on the mitigation strategies.</p> <p><u>Permanent Site Access</u> Design Plans – Highways and Site Access (Doc 4.11) [APP-025] illustrates the proposed junction layout which once constructed will be used by construction and operational traffic to access the proposed WWTP. The design of the permanent site access incorporates a traffic island to prevent 'right turns' onto Horningsea and the configuration of the existing signalised junction to take vehicles directly into the proposed WWTP from the A14 limiting vehicle movements on the local road network. The design of the permanent site layout and the highway improvements proposed to the immediate vicinity of the permanent site access have been informed through consultation with stakeholders and the community.</p> <p><u>Operational Traffic</u> The Operational Workers Travel Plan (Doc 5.4.19.8) [APP-149] sets out measures to encourage sustainable travel and reduce single occupancy private vehicle use associated with all operation and maintenance activities with</p>

Reference	Relevant Representation Comment	Applicant's Response
RR-186, RR-070, RR-296, RR-061, RR-109, RR-245, RR-080, RR-144, RR-303, RR-309	Representations raised questions regarding the access to the site.	<p>the overall aim of reducing vehicle trip and encouraging active travel.</p> <p>The appropriate access for the new development is via junction 34 of the A14 Strategic Road Network. A new junction on the A14 to serve the proposed development was not acceptable principally on DfT policy grounds [<i>DfT Circular 01/2022 'Strategic Road network and the delivery of sustainable development'</i>] and safety concerns. This was agreed with the Relevant Highway Authorities in reviewing alternative access options</p> <p>The assessment of the options determined that the existing A14 junction 34 (Horningsea Road) was an appropriate access to the proposed WWTP from the A14, with westbound traffic accessing the site, and eastbound traffic exiting the site using the A14 junction 33 Milton Interchange.</p> <p>Discussions with National Highway determined that a new junction on the A14 to serve the proposed development was not acceptable principally on Department for Transport (DfT) DfT policy grounds, and highway safety concerns.</p>
RR-046, RR-154	The Travel Plan data provided is out of date and does not factor in the new	The Construction Transport Management Plan (CTMP) (App Doc Ref 5.4.19.3) [AS-109] sets

Reference	Relevant Representation Comment	Applicant's Response
	<p>developments at Waterbeach and Marleigh which alone will have a significant impact on traffic on this route. The use of the Car Dyke junction and the Denny End junction, which are both accident spots were not addressed in the Travel Plans.</p>	<p>out the commitment to manage vehicle routes and timings to ensure that construction access points are clearly known to users of the roads/footways/cycleways and deliveries are organised to avoid the busiest times on the network in the morning, evening and at school pick up times.</p> <p>The CTMP Section 3 'CTMP Management and Communication' The CTMP sets out the commitment to provide community liaison that ensures construction information, such as specific high- volume activities or changes to access points as construction works are completed, is provided to ensure this is communicated and can be disseminated with the communities affected.</p>
RR-041	<p>The Construction Traffic Management Plan (APP-148) identifies that vehicles arriving and departing via the A14 will exit using Junction 33 routing via Milton Road and Cowley Road. It is noted within the Access and Traffic Regulation Order Plans (APP-021) that there is an intention to use road closures on the eastbound A14 and junction 33 slip roads. Will road closures be communicated in advance of such activity and that a suitable alternative provided?</p>	<p>The Applicant has indicated the intention to prepare an Operational Traffic Management Plan (OLTP). This will develop further measures for operational controls on traffic movements to and from the proposed WWTP. This would, amongst other things state working hours, any restrictions on vehicle movements, and other measures such as monitoring and communicating advanced activity.</p>

Table 4-13 Biodiversity and wildlife

Reference	Relevant Representation Comment	Applicant's Response
RR-050, RR-053, RR-055, RR-060, RR-063, RR-069, RR-070, RR-071, RR-072, RR-083, RR-085, RR-089, RR-092, RR-093, RR-098, RR-101, RR-112, RR-118, RR-120, RR-123, RR-128, RR-138, RR-140, RR-142, RR-144, RR-145, RR-146, RR-153, RR-154, RR-157, RR-160, RR-162, RR-164, RR-165, RR-166, RR-171, RR-172, RR-178, RR-181, RR-186, RR-189, RR-190, RR-191, RR-194, RR-195, RR-201, RR-202, RR-207, RR-211, RR-212, RR-216, RR-227, RR-229, RR-230, RR-233, RR-239, RR-242, RR-245, RR-246, RR-247, RR-248, RR-249, RR-255, RR-259, RR-260, RR-266, RR-281, RR-284, RR-287, RR-288, RR-290, RR-293, RR-294, RR-305, RR-307, RR-309, RR-037, RR-022, RR-026, RR-024,	Representations expressed concern regarding the project's impact on biodiversity and wildlife in the area. Particularly mentioned were: bats, owls, deer, hares, badgers, foxes, voles, and hedgehogs. The birds mentioned were goldfinches, skylarks, woodpeckers, cormorants, herons and migrating egrets.	<p>Construction and operation effects will be largely mitigated by avoidance or best practice mitigation measures, resulting in no significant biodiversity impacts.</p> <p>More information regarding the potential impacts on biodiversity and wildlife can and the resultant mitigatory measures can be found within ES Chapter 8 Biodiversity (doc ref 5.2.8) [AS-026].</p> <p>The proposals set out in the Landscape, Ecological and Recreational Management Plan (LERMP)(Application Document Reference: 5.4.8.14 [AS-066], have been designed to deliver a minimum of 20% Biodiversity Net Gain (BNG) on the site of the proposed WWTP, with the potential to connect to the Cambridge Nature Network.</p>

Table 4-14 Health and Wellbeing

Reference	Relevant Representation Comment	Applicant's Response
RR-055, RR-142, RR-237, RR-249, RR-202, RR-101, RR-172, RR-299, RR-221, RR-052, RR-186, RR-084, RR-225, RR-191, RR-169, RR-140, RR-154, RR-053, RR-070, RR-233, RR-057, RR-167, RR-200, RR-207, RR-254, RR-067, RR-112, RR-238, RR-061, RR-124, RR-127, RR-143, RR-029, RR-191, RR-215, RR-245, RR-080, RR-088, RR-117, RR-128, RR-157, RR-161, RR-212, RR-231, RR-239, RR-242, RR-248, RR-259, RR-287, RR-134, RR-109, RR-110, RR-115, RR-177, RR-182, RR-197, RR-103	Respondents reported general concerns about impacts on health	<p>During construction, taking into account mitigation measures implemented through the application of management plans as specified by the Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [APP-068], potential health effects associated with construction activities have been considered and are not anticipated to be significant.</p> <p>During operation, taking into account relevant mitigation measures, potential health effects associated with operation have been considered and are not anticipated to be significant.</p> <p>Further information is available in the Environment Statement Chapter 12 Health (App Doc Ref 5.2.12) [APP-044].</p>
RR-142, RR-237, RR-221, RR-186, RR-084, RR-225, RR-191, RR-140, RR-154, RR-053, RR-167, RR-207, RR-254, RR-067, RR-112, RR-061, RR-124, RR-127, RR-143, RR-284, RR-109, RR-177, RR-215, RR-245, RR-080, RR-088, RR-117, RR-128, RR-157, RR-239, RR-242, RR-259, RR-287, RR-134	Respondents reported concerns about impacts on mental health	<p>The Mental Health Impact Assessment (MHIA) screening has been completed and is provided within Annex A of Appendix 5.4.12.3 [AS-077] to the ES Chapter 12 Health. This has been amended to include some further details. The screening concludes that no further MHIA is required as adverse impacts are unlikely. Section 7 of the screening provides further references to measures that will be implemented to avoid or reduce potential negative impacts. The appointed contractors</p>

		<p>will be required to implement the Code of Construction Practice (CoCP) Part A and B (App Doc Ref 5.4.2.1 and 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.</p> <p>The Applicant also refers to the application of the CLP 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.</p>
<p>RR-200, RR-238, RR-095, RR-212, RR-115, RR-152, RR-194, RR-146, RR-140, RR-249, RR-191, RR-191, RR-225</p>	<p>Respondents reported concern regarding the impact of air pollution on health</p>	<p>The Applicant has assessed the impact of air pollution against relevant air quality standards. The assessment showed no exceedances of relevant air quality standards. The assessment of health effects is informed by the outputs of the air quality assessment. As no significant effects were identified in the air quality assessments, the health assessment did not identify any additional health effects from changes in air quality.</p>
<p>RR-138, RR-249, RR-181, RR-070, RR-204, RR-024, RR-127, RR-109, RR-245, RR-297, RR-128, RR-239, RR-242, RR-273</p>	<p>Respondents reported concern regarding the impact of light pollution</p>	<p>The Applicant has confirmed that the height of the lights inside the earth bank will be no greater than 5m. This lighting will also be directed downwards and generally only when</p>

		<p>carrying out tasks. Lighting outside of the earth bank will be discrete and kept to a minimum for safety reasons. It will also be active for use, not activated all through night time hours. Lighting along Horningsea Road will be agreed with the local highway authority and only installed if absolutely necessary for safety reasons. A Lighting Assessment has been carried out and plans for lighting are set out in ES Chapter 2 Project Description (App Doc Ref 5.2.2) [APP-034].</p>
<p>RR-249, RR-202, RR-181, RR-101, RR-172, RR-186, RR-225, RR-153, RR-140, RR-154, RR-027, RR-070, RR-264, RR-300, RR-146, RR-167, RR-200, RR-058, RR-095, RR-061, RR-024, RR-127, RR-150, RR-191, RR-109, RR-245, RR-297, RR-080, RR-083, RR-128, RR-132, RR-212, RR-231, RR-242, RR-259, RR-309</p>	<p>Respondents reported concern regarding the impact of noise pollution</p>	<p>Potential impacts related to noise and vibration during the construction, operation and maintenance of the Proposed Development are considered within ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [AS-036].</p> <p>Mitigation measures will also be implemented, including the provision of solid site hoarding/acoustic barriers around construction compounds in select areas close to receptors, restriction of working hours to avoid sensitive times of the day and application of measures and Best Practicable Means (BPM) in accordance with BS 5228. These measures are reflected in the Code of Construction Practice (CoCP Part A and B, Appendix 2.1 and 2.2) (App Doc Refs 5.4.2.1 and 5.4.2.2) [APP-068 and AS-161].</p>

		<p>With implementation of mitigation measures the construction noise and vibration moderate adverse impacts would be avoided or reduced and the resulting effects would be not significant. Assessment results for noise impacts during operation indicate that noise impacts at the closest noise sensitive receptor locations are not significant. Operational traffic associated with the proposed WWTP also shows that noise impacts due to changes in road traffic would be limited and not significant as a result of high existing traffic flows, particularly on the A14.</p> <p>The noise effects from decommissioning activities at the existing Cambridge WWTP would be limited and are not significant</p>
RR-212	<p>Whilst any escape of gas, toxin/bacteria/parasite/viral spread is a potential risk for any WWTP, the risk of disturbing a functional site coupled with the additional transportation of sewage sludge does not seem a rational risk to take if all factors are clearly weighed up in this wider argument. How would such risks be eliminated?</p>	<p>The Outline Decommissioning Plan (App Doc Ref 5.4.2.3) [AS-051] has been submitted as part of the application. The Plan provides an outline of how plant at the existing Cambridge WWTP will be decommissioned safely as part of the process to surrender the existing Cambridge WWTP's Environmental Permit. A more detailed plan would be developed as a DCO requirement and to ensure the activities meet the requirements of the Environment Agency to surrender the permit</p>

Table 4-15 Socio-economics

Reference	Relevant Representation Comment	Applicant's Response
RR-109	The plan does not meet the criteria for social value as outlined in the Social Value Act 2012, as there is no tangible benefit to the community.	<p>The Applicant has assessed the economic, social and environmental impacts of the project within the Environmental Statement.</p> <p>The proposed project will provide the following benefits.</p> <ul style="list-style-type: none"> • Allow the existing site to be redeveloped, delivering around 5,600 of the 8,350 much-needed new homes in North East Cambridge, including around 40 per cent affordable housing (rented and shared ownership). • Enable the vision of an inclusive, walkable, low-carbon new city district with a lively mix of homes, workplaces, services and social spaces with good connectivity, that are fully integrated with surrounding communities. • Enable improvements to walking, cycling and public transport connectivity, helping to address climate change through reducing car use. • Create new parks and open spaces that will form an accessible green space network with a wide range of plants and wildlife, linked with parks in the wider area.

		<ul style="list-style-type: none"> • Reduce pressure for housing development in greenfield locations, where it would take up far more land and be less sustainable in terms of transport emissions. A low-carbon city district can achieve higher densities of housing than housing developed on greenfield or Green Belt sites and achieve a higher proportion of non-car journeys. <p>As evidenced in ES Chapter 11 Community (Doc ref 5.2.11) [AS-028] the effects of the Proposed Development on the existing community receptors during operation have been assessed as slight beneficial, as a result of new recreational opportunities. An example of these are the Discovery Centre and the new bridleway.</p>
RR-212	The idea of an environmental education centre focusing on all the current 'buzzwords' must be conditioned by Planning Consent to come into fruition, not dropped as a 'nice to have' if the funding gets too tight.	The provision of the Discovery Centre is included within the dDCO (App Doc Ref 2.1) [AS-139]. The Applicant intends to include the environmental education centre in the final design of the proposed development.
RR-175	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	The North East Cambridge Area Action Plan (NECAAP) is being brought forward under Policy 15 of the adopted Cambridge Local Plan 2018. he NECAAP identifies that the creation of this new district will deliver 8,350 homes (40% affordable), 15,000 new jobs

	<p>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.</p>	<p>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 <i>“the most sustainable location for strategic scale development available within Greater Cambridge”</i> (as stated in the relevant representations of both South Cambridgeshire District Council and Cambridge City Council – RR-004 and RR-002).</p> <p>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 the following.</p> <ul style="list-style-type: none"> • 5,500 new homes • 23,500 m² new business space
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		<ul style="list-style-type: none">• 13,600 m² 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) <p>Decommissioning and release of the existing Cambridge WWTP site supported by the HIF funding (see App Doc Ref 8.8) will enable this regeneration which could not otherwise be delivered if the existing Cambridge 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 Cambridge WWTP remains, it would make the achievement of this job growth target more difficult.</p>
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Table 4-16 EIA

Reference	Relevant Representation Comment	Applicant's Response
RR-106	It is unclear how leaving certain structures of the existing plant in place is accounted for in the Environmental Impact Assessment	An outline Decommissioning Plan (Doc Ref: 5.4.2.3) [AS-051] is included within the application. Once the existing Cambridge WWTP has been brought forward for development the Hartree proposals would be supported by a separate planning application and associated EIA. This will include detail in relation to land quality and any remediation that may be required in respect of proposed future use of the land.
RR-083	<p>Regarding Bat surveys-</p> <ol style="list-style-type: none"> 1. The low level of attempted survey effort for the transect surveys as only three repeats, given the development affects the river valley of the Cam and associated floodplain habitats, likely to be used by roosting, foraging and commuting bats, and which appears to be of "medium" or "high" quality; however the required level of effort was not achieved 2. The duration of the transects as stated, some of which are only 1 hr and 5 mins, although no information is presented on timings that I can find 	The Applicant undertook surveys as outlined in Table 2-4, 2-6 and 2-7 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 Scheme 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 5.4.8.7 ES

	<ol style="list-style-type: none"> 3. The anonymisation of the tree survey results. 4. The lack of access to Biggin Abbey, which has large historical buildings with apparent good potential for bats 5. Additional limitations as highlighted in the report. "2.9.5 Due to the length of two of the transects, one at the existing Cambridge WWTP and one around PRow 85/6 and adjacent land parcels (Figures 8.45, 8.46 and 8.47, Book of Figures – Biodiversity (App Doc Ref 5.3.8)), activity transects fell short of the recommended duration in the Bat Conservation Trust Good Practice Guidelines (Collins, 2016). 2.9.6 During May 2021 and August 2021 the River Cam static detector (location TL 48410 61610), despite being deployed for at least five nights, only collected three nights' worth of data from each month. Likewise, during August and September at the Proposed Development static detector location (TL 49846, 61223) only four nights of data were collected from each month. This was due to high instances of bat calls or other noise, filling the memory cards or running the batteries low, leading to power failure." 6. The lack of full information on timings, weather conditions, personnel and raw data sheets[My apologies if I could not find these and they were in 	<p>Volume 4 Chapter 8 Appendix 8.7 Bat Technical Appendix [APP-092], and impacts are assessed within ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [AS-026].</p> <p>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, 5.4.4.2 ES Volume 4 Chapter 4 Appendix 4.2 Scoping Report [APP-080]), with limitations presented within the Appendix 8.7 Bat Technical Appendix document. 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.</p> <p>Information that was deemed sensitive was redacted to protect species.</p> <p>Survey information is provided within 5.4.8.7 ES Volume 4 Chapter 8 Appendix 8.7 Bat Technical Appendix (App Doc Ref 5.4.8.7) [APP-092]. No personal surveyor information is included within this information, however, all surveys were led by an appropriately</p>
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	<p>an annex] These constraints lead me to have serious concerns about the robustness of the dataset collected and the ability for meaningful conclusions to be drawn by an informed person. I also note that Western barbastelle, which is an Annex 2 species under the European Habitats Directive, is indicated as being present within the development area, but that no attempt has been made to identify how close these bats are roosting to the site, whether commuting routes would be impacted; or whether the extent of their use is underestimated due to the limitations in survey effort identified above and within the report. It would seem unlikely that these bats are arriving from known roosts West of Cambridge at "Eversden and Wimpole Woods Special Area of Conservation (SAC)" and that there may be a nearer undocumented roost.</p>	<p>experienced surveyor (minimum "capable" as outlined in the Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition) (Collins, 2023)), with the design of the surveys undertaken by an "authoritative" ecologist.</p> <p>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.</p>
RR-109	<p>Concern was raised in regards to the accuracy of the Strategic Carbon Assessment (Doc Ref 7.5.2)[APP-206].</p>	<p>The Applicant is aware that ExA has asked for the concerns raised regarding the Strategic Carbon Assessment (Doc Ref 7.5.2) [APP-206] to be set out within a written representation. The Applicant will respond directly to the written representation at Deadline 2.</p>

Table 4-17 Local plan

Reference	Relevant Representation Comment	Applicant's Response
RR-297	The proposal is not compliant with Minerals & Waste Local Plan which contains no policy or specific reference to any relocation of the Cambridge WRC	<p>The Applicant acknowledges that the relocation of the WWTP is not specifically mentioned within the Minerals and Waste Local Plan 2021. However, the relevancy of the proposed development to the local plan's policies are as follows.</p> <ul style="list-style-type: none"> • 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 1 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

		<p>Development has been screened to establish whether it is within a designated Waste Management Area, a designated area within the Local Plan whereby waste management facilities are prioritised.</p> <ul style="list-style-type: none">• 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.
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		<ul style="list-style-type: none">• 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.• Policy 19: Restoration and aftercare: The policy has been considered to confirm that the Proposed Development does not require a restoration and aftercare
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		<p>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.</p>
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Table 4-18 Site Selection and alternatives

Reference	Relevant Representation Comment	Applicant's Response
RR-296	<p>The Honey Hill site was preferred to the site at Milton. The site at Milton also features 48 hectares of waste landfill site. A Park and Ride for 792 cars. Major supermarket with parking for 500 cars An early 20thcentury industrial site Waste Recycling Centre and shortly The City Police HQ Two extremely busy inter-city road routes. (A14 and A10) Why ruin a rare environment for one which has already been so heavily compromised?</p>	<p>The Stage 4 site selection process concluded on balance, that site area 3 (the chosen site) represented the best performing site, based both on numbers of criteria and on their relative importance. The site area provides significant opportunities for environmental enhancement, overcoming Green Belt harm. Environmental risks to landscape, biodiversity and heritage assets can be appropriately mitigated, including through the delivery of biodiversity net gain.</p> <p>In the majority of assessments site area 1, the closest to Milton, performed poorly in comparison to either site area 2 or 3. Site area 1 is in open landscape, in close proximity to Landbeach and Milton and, unlike sites 2 and 3, additional odour control measures would be required to mitigate the risk of odour impact at the nearest high sensitivity receptors. Locating a WWTP at site area 1 would also have a significant impact on the fruit farming business within the site area, potentially resulting in extinguishment of the business and loss of employment which presents a significant socioeconomic impact. Therefore it was determined that site area 1 was the least</p>

		<p>preferable at the fourth stage of the site selection process.</p> <p>Further information regarding the site selection process can be found in ES Chapter 3 Site Selection and alternatives (App Doc Ref 5.2.3) [AS-018].</p>
RR-151	<p>The exclusion of any land from the site search that was within 400m from any residential property was an unduly restrictive selection criterion.</p>	<p>The 400m buffer was an important site selection constraint to mitigate any potential impact of odour residents.</p> <p>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 buffer zone established in the local plan policy.</p> <p>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-</p>

		<p>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.</p>
<p>RR-151</p>	<p>Site 2 at Impington was rejected mainly because of the development aspirations of the landowner, which was not a criterion that was generally applied to other sites, nor should it have been.</p>	<p>The same selection criteria were applied to each of the three shortlisted sites at stage 4 of the site selection process.</p> <p>The Stage 4 site selection process concluded on balance, that site area 3 represented the best performing site, based both on numbers of criteria and on their relative importance. The site area provides significant opportunities for environmental enhancement, overcoming Green Belt harm. Environmental risks to landscape, biodiversity and heritage assets can be appropriately mitigated, including through the delivery of biodiversity net gain. In contrast, the risks posed by site area 2, in relation to competing land uses and future resilience would be difficult to overcome.</p>

		Further information regarding the site selection process can be found in ES Chapter 3 Site Selection and alternatives (App Doc Ref 5.2.3) [AS-018].
RR-225, RR-200, RR-024	Respondents raised concern regarding the adequacy of the site selection process.	The applicant applied a rigorous 4-stage site selection process considering alternative sites. On balance, the chosen site was found to perform best across a range of key assessment criteria and opportunities for delivering enhancements. A description of the site selection process and the alternatives which have been considered can be found within ES Chapter 3: Site Selection and Alternatives (App Doc Ref 5.2.3) [AS-018].
RR-103	If it does have to be moved – it should be moved to the disused MOD land at Waterbeach.	<p>A potential site area which includes the land of the former Waterbeach Barracks was identified as part of the site selection process.</p> <p>During the site selection process, a potential area which included the former Waterbeach Barracks was considered. The site performed poorly against a range of important criteria but particularly as it encompasses the proposed Waterbeach New Town development. As a result, the site was removed from further consideration following stage two of the four-stage site selection process.</p>

		<p>More information regarding the site selection process can be found within ES Chapter 3 Site Selection and Alternatives (App Doc Ref 5.2.3) [AS-018] and ES Appendix 3.3 Course Screening Report (App Doc Ref 5.4.3.3) [APP-076].</p>
<p>RR-121, RR-304, RR-178</p>	<p>Some respondent stated that the chosen site had been rejected previously for planning permission.</p>	<p>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.</p> <p>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.</p>

4.2 Responses to Landowners' Relevant Representations

Table 4-19 Gonville & Caius College (56341)

Reference	Relevant Representation Comment	Applicant's Response
Rep 1 Scheme design	Gonville & Caius College, Cambridge ('The College') is concerned by the design of the scheme and lack of detailed rationale for elements of its design. We believe the proposed acquisition of the College's freehold land is excessive. The College, via their agent Bidwells, has repeatedly attempted to engage in productive discussions with Anglian Water ('AW') regarding the design and various comments had been reflected in plans which were being considered in negotiating Heads of Terms for an option agreement in relation to the scheme.	<p>The Applicant notes the stakeholder's comment about design but refers the stakeholder to the Design and Access Statement (App Doc Ref 7.6) [AS-168].</p> <p>In relation to land acquisition, the Applicant and the stakeholder have held a number of constructive discussions on a without prejudice basis which have included the review of detailed layouts and designs.</p> <p>To the north of the A14, the Applicant proposes to acquire two areas of freehold land from the stakeholder. These are parcels 019a and 021b (see Sheet 2 of the Land Plans (App Doc Ref 4.4.2) [AS-151]. The acquisition of parcel 019a will allow the construction of the final effluent outfall structure (see App Doc Ref 4.13). Parcel 021b will enable the delivery of environmental mitigation (see Appendix C: Outline River Units Net Gain Strategy Environmental Statement - Volume 2 - Chapter 8 – (App Doc Ref 5.2.8) [AS-026]). Those negotiations have been constructive and are ongoing, and the Applicant is hopeful of reaching agreement during the Examination with the stakeholder for an option to acquire the necessary land and rights.</p> <p>The Applicant has consulted with the stakeholder since 2021, including meetings with the stakeholder and its agent, to discuss the project and land required. In addition, the Applicant has served a s42 letter, a s48 notice and a s56 notice on the stakeholder.</p> <p>The Applicant appointed its agent, Savills, to consult with and engage with the stakeholder on the acquisition of the land and rights for the Proposed Development.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Throughout the process, responses from AW and their agent, Savills, to requests for information have been slow, incomplete, and inconsistent. Whilst there has been engagement, it has not been particularly productive, although Bidwells are now in discussions with Savills for heads of terms, although on different areas when compared to the DCO plans. The plans submitted for the proposed DCO do not match what was represented to the College as the current plan and do not incorporate the numerous comments which have been made by Bidwells to Savills as part of the negotiation. Notably, the College's field to the north of the A14 (021b) has been included for freehold acquisition in its entirety. The inconsistency and lack of reliable plans has made negotiations difficult, and the College does not have confidence that AW is acting in good faith. We now make initial comments based on the Land Plans submitted as part of the DCO application. Bidwells, as agent, note that this approach to DCO by developers seems to be becoming commonplace, with compulsory</p>	<p>As can be seen from the details listed below, there has been considerable engagement. Savills has been in regular contact with the stakeholder's agent since 2022, as set out in the following chronology.</p> <ol style="list-style-type: none"> 1. Draft Heads of terms for the acquisition of land and rights were sent to the stakeholder's agent on the 29th July 2022. 2. On 2nd August 2022, Savills and the stakeholder's agent held a Teams meeting to discuss the heads of terms and listen to any comments. 3. A further meeting was held on the 12th September 2022, when the same comment was made by the stakeholder's agent. Savills explained the need for mitigation land in close proximity to the river due to the formulation of ditches that will be fed by water from the river. 4. On the 17th October 2022 the stakeholder's agent asked for information regarding the need to acquire parcel 021b. Savills agreed to respond with ecological justification. 5. A further meeting was planned for December 2022 that was subsequently cancelled by the stakeholder's agent due to sickness. 6. Between December 2022 and February 2023, having taken on board the issues raised by the stakeholder regarding the proposed acquisition of the freehold of parcel 021b, the Applicant worked up a more detailed proposal for the nature of the acquisition of parcel 021b and this was presented to the stakeholder's agent on the 13th February 2023, together with further plans and diagrams relating to the Transfer Tunnel. 7. On the 7th March 2023 Savills sent the stakeholder's agent an email asking for confirmation that the solution could be pursued. A response was received on the 12th April 2023 requesting further information on the need to acquire parcel 021b. 8. On the 21st April 2023 Savills and the stakeholder's agent met to discuss the heads of terms, which incorporated the proposed solution.

Reference	Relevant Representation Comment	Applicant's Response
	<p>purchase powers being sought before sufficiently detailed design work is completed.</p>	<p>9. On the 24th April 2023 and 25th April 2023 emails were sent from Savills to the stakeholder's agent containing information requested during the meeting.</p> <p>10. On the 10th May 2023 a formal request had been made to provide information on the need for BNG river units to be provided on parcel 021b. This was sent to the stakeholder and the stakeholder's agent on the 23rd May 2023.</p> <p>11. On the 7th July 2023 Savills emailed the stakeholder's agent requesting responses to the heads of terms and whether any further information was needed, including, if necessary, an opportunity to meet with the Applicant's ecologist. A response was received on the same day confirming the stakeholder's agent hoped to respond on the heads of terms within the next few weeks and there was some confusion between the revised heads of terms and the DCO plans.</p> <p>12. A meeting was then confirmed and held on the 19th July 2023 between the Applicant, Savills, the stakeholder and the stakeholder's agent to discuss the proposed heads of terms and a solution to the acquisition of parcel 021b. The meeting was productive and Savills followed up the meeting with an email on the 19th July 2023 setting out the terms that had been agreed during the meeting and next steps. That email was sent to the stakeholder and the stakeholder's agent. Savills contacted the stakeholder's agent on the 3rd August 2023 for a response and, on the 9th August 2023, the stakeholder's agent confirmed a response to the heads of terms would be sent, and confirmed their desire to reach a commercial agreement.</p> <p>The Applicant has engaged with the stakeholder and its agent to consider comments made by the stakeholder, in particular with regards to the acquisition of parcel 021b.</p> <p>Following a meeting on the 19th October 2023 the Applicant and the stakeholder's agent were able to narrow the areas of dispute during a productive meeting. As of 14th November 2023, Savills is still awaiting a substantive response to these heads of terms</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>but remain willing and able to reach a commercial agreement for the acquisition of land and rights by agreement.</p> <p>The correspondence between the Applicant's agent and the stakeholder's agent clearly shows every effort has been made by the Applicant to understand the concerns of the College and to work with it to minimise any impact, allowing an agreement to be capable of being reached in a timely manner.</p> <p>The Applicant is continuing to review its plans in an attempt to further reduce the impact on the Stakeholder's land and its tenant's operation.</p>
<p>Rep 2 Scope of rights proposed for acquisition</p>	<p>The design and proposed areas of freehold ground-level acquisition are ill designed and inappropriate for a working farm, which the property is. The College is extremely concerned by the excessive proposal to acquire the entirety of the field to the north of the A14 (021b) for Biodiversity Net Gain (BNG) purposes. This is addressed in detail below. The plans also propose freehold acquisition of two tunnel shafts, both in the middle of working arable fields (021r and 021s) whereas the rest of the tunnel involves just the acquisition of the subsoil. There is no sense in AW owning the surface level of</p>	<p>The Applicant has designed the structures and method of construction to minimise disruption to the stakeholder's tenant's farming operation. This has included consulting with the tenant since 2020.</p> <p>Whilst the Transfer Tunnel runs at a depth of approximately 20m through the stakeholder's land the shaft structures are physically linked to the surface and in the absence of an agreement will need to be protected through the compulsory acquisition of the freehold footprint of that part of parcels 021r and 021s (see Land Plans (App Doc Ref 4.4) within which the shaft structures are located. The Applicant has, however, indicated to the stakeholder's agent that it may be possible to transfer the surface land within these two parcels back to the stakeholders (and hence its tenant) in due course following the construction of the Waste Water Transfer Tunnel, subject to concluding a legal agreement which ensures the protection of the shafts and the Waste Water Transfer Tunnel, together with access for maintenance. This would facilitate the continuation of the farming operation over those areas.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>two tiny parcels in the middle of a field, which will have no use after the shafts are decommissioned and no access. These should be covered by temporary access reverting to the College on completion of the scheme and so eliminate the need for ongoing tenancies between the parties. Whilst Savills have stated that the DCO does not have provision for these areas to be acquired in any other way bar freehold acquisition, this is not convincing and does not provide a solution to the long-term integrity of Poplar Hall Farm's title, with various areas of third-party freehold acquired in the middle of working fields. Development over the rising main (area 021d) is heavily restricted under the proposed DCO. AW previously suggested only temporary restrictions on development were needed, but this is not in the proposed DCO. There is minimal detail in the proposed DCO as to why some areas are required. This includes the BNG land, the rising shafts, and the very general right of access across the farm track at Poplar Hall Farm. All of these matters have previously been discussed with</p>	<p>Parcel 21d is needed for the delivery of the Waterbeach Pipelines (Works Plan 31 (see App Doc Ref 4.3.2) [AS-150]) and the subsequent restrictions needed to protect it from damage during use. The proposed restrictions referred to over the rising mains (parcel 021d) are in line with restrictions normally associated with rising mains and do not seek to prevent usual farming activities at the surface. The purpose of the restrictions is to prevent intrusive development over the width of the easement, that in the opinion of the Applicant, could potentially be damaging to the pipeline. The Applicant has made it clear that in the event that a form of development on the land is proposed it would need to be consulted and given the opportunity to review those plans as part of its statutory remit. It is the Applicant's opinion that these will have little impact on the that part of the stakeholder's land which is currently in agricultural use.</p> <p>The stakeholder refers to a general right of access. The Applicant requires access over the stakeholder's land for the purpose of inspecting and maintaining structures, the outfall structure. These access routes are over existing access routes and inspections will likely be limited to a visual inspection from time to time. It is not anticipated that this will cause a detrimental impact to the stakeholder or its tenants use of the land.</p> <p>The Applicant refers the stakeholder to the Statement of Reasons (App Doc Ref 3.1) [AS-013], where justification for the various areas of land and imposition of restrictions is provided. These points have also been explained and discussed with the stakeholder at the meetings referred to above.</p>

Reference	Relevant Representation Comment	Applicant's Response
	Savills but are not reflected in the proposed DCO.	
Rep 3 Biodiversity Net Gain	<p>The College notes that AW has imposed a target of a net 20% gain in biodiversity across the scheme. This is not a regulatory requirement but is AW's self-imposed target. AW has decided to deliver the bulk of this 20% BNG via the freehold acquisition of a large parcel of Poplar Hall Farm (021d), without responding to the College's reasonable objections. Bidwells, the College, and AW's agents have discussed this point and the College has been clear that unless AW is able to conclusively demonstrate the 20% uplift is absolutely required and can only be delivered in that specific parcel, its acquisition will be objected to. It is important to note that recent discussions before DOC submission with AW's agent on this parcel have been restricted to the northern ditch and to creating further ditches for water voles, along the northern portion of the field. The difference in DCO plans makes it very hard to reasonably negotiate with Savills, when it is unclear the actual</p>	<p>The Applicant's position on Biodiversity Net Gain (BNG) is set out in Environmental Statement - Volume 2 - Chapter 8 – (App Doc Ref 5.2.8) [AS-026].</p> <p>The Applicant is only seeking to acquire land from the stakeholder which is necessary to provide both environmental mitigation and BNG in relation to that part of the Proposed Development around the Final Effluent Outfall (Works No 32 (see Sheet 2 of the Works Plans (App Doc Ref 4.3) [AS-150]). The location has been chosen due to its unique habitat and proximity to the river Cam. The Applicant is not proposing to deliver any other BNG on the stakeholder's land.</p> <p>The Applicant has explained to the stakeholder's agent, and with the stakeholder at the meeting on 19th July 2023, that the BNG needed to mitigate the impact of the final effluent outfall on the river Cam can only be provided within parcel 021d, as described in paragraph 1.3.5 of Appendix C: Outline River Units Net Gain Strategy Environmental Statement - Volume 2 - Chapter 8 – (App Doc Ref 5.2.8) [AS-026]. At this stage of the project and, given the number of activities to happen in the area, the exact position of the location of the BNG cannot be fixed. The Applicant will continue to review the location of the BNG and liaise with the stakeholder and its tenant.</p> <p>The ditch habitat creation has been proposed within the area shown for Works No 39 on Sheet 2 of the Works Plans (App Doc Ref 4.3.2) [AS-150] which is located within parcel 021d (see Sheet 2 of the Land Plans (App Doc Ref 4.4.2) [AS-151]). The reasons for creating the ditch is this location are described in Appendix C: Outline River Units Net Gain Strategy Environmental Statement - Volume 2 - Chapter 8 – (App Doc Ref 5.2.8) [AS-026]. This area is desirable for the habitat creation because it will be connected to the habitat already in use by water vole and provide the mitigation</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>position of AW. Bidwells remain negotiating with Savills on heads of terms for a consensual agreement, which are on the basis of a smaller area being acquired. We understand the desire to deliver the scheme in an environmentally positive way, however, it cannot be reasonably judged that AW's proposal to acquire this northern field (021d) for a self-imposed BNG target meets the three requirements for compulsory acquisition under DCO and we strongly object on this basis. As part of the negotiation discussions, we requested a copy of the environmental report which suggested that the land at Poplar Hall was required to deliver their BNG uplift. The College eventually had to resort to Environmental Information Regulations to obtain it in late May 2023. The report, referenced as Appendix 8.13 in the DCO application, measures BNG using the Biodiversity Net Gain Metric 3.0, which identified Poplar Hall for creation of River Units. The report concludes that the River Units can only be supplied in certain areas i.e., where land is connected to the river. The report suggests that AW</p>	<p>needed to allow dispersal into the newly created habitat. The area is also suitable based on the hydrology of the area for ditch creation to ensure the feasibility of the habitat proposed. The proposals are also in keeping with Biodiversity Metric 3.0 <i>Principle 7 Compensation habitats should seek, where practical, to be local to the impact</i> and, therefore, there is a preference for onsite BNG. This is also detailed in Table 4-1.</p> <p>The BNG good practice principles for development and their application on the Proposed Development are described in the BNG Report Environmental Statement - Volume 2 - Chapter 8 – (App Doc Ref 5.2.8 [AS-026]). Principle 6 achieving the best outcomes for biodiversity, supports achieving net gain locally to the development. This is also in line with the mitigation hierarchy in providing compensation as close to the location of impact. Therefore, the metric supports for BNG to be achieved onsite.</p> <p>Further explanation on the need for compulsory acquisition of land within parcel 021b for ecological mitigation and BNG purposes is provided in response to ExQ1.8.17.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>can either provide this within the scheme area (obviously preferable to them) or look to procure these on the market, albeit river credits are not currently available. Our view on this is that whilst the River Units may not be readily available, AW could procure these elsewhere from a third party. Bidwells has arranged this for other clients, so it is known to be possible. The report very briefly describes that there are no suggestions for other surface water features within the scheme area but this does not explain why the River Units cannot be achieved on the other side of the river i.e., within the scheme area and within the land already owned by Anglian Water. In short, we strongly reject to any College land being acquired solely for the purpose of delivering BNG for the scheme, because it is excessive, there is a market for obtaining it elsewhere and AW can provide it on land it owns.</p>	

Table 4-20 Arqiva (56126)

Reference	Relevant Representation Comment	Applicant's Response
None given	Whilst Arqiva has no objection to the principle of the relocation project, means of access to this equipment room should be preserved at all times as should the means of providing power and fibre connectivity to the site.	<p>The Applicant confirms it has no intention to disrupt access, power or fibre connectively to the stakeholder's equipment room which is located within parcel 003e on Sheet 1 of the Land Plans (App Doc Ref 4.4.1) [AS-151].</p> <p>The ExA will be aware there are general protective provisions in Part 8 of Schedule 15 to the dDCO (App Doc Ref 2.1) [AS-139] to protect the equipment belonging to the Electronic Communication Code networks.</p> <p>The Applicant confirms it will consult with the stakeholder regarding its equipment.</p>

Table 4-21 bpha Limited (56215)

Reference	Relevant Representation Comment	Applicant's Response
None given	We may have land or buildings affected by the proposed relocation, we are currently investigating the extent of how we will be affected but we're keen to give notice of our interest in the application.	<p>The Applicant notes the stakeholder's comment about having an interest in land or buildings which might be affected by the Proposed Development.</p> <p>The Applicant invites the stakeholder to make contact with the Applicant to discuss their interest in land and the Applicant will keep the stakeholder informed about the progress of the Application.</p>

Table 4-22 Ellen Francis (56300)

Reference	Relevant Representation Comment	Applicant's Response
None given	In assessing the proposals, the Planning Inspectorate, and in turn the Secretary of State, must be satisfied that the impacts of the proposals have been adequately assessed and the weight attributed to these is correct.	The Applicant notes the comments made by the stakeholder.
None given	It is recommended that consideration should be applied to potential harmful effects associated with odour and amenity and transport. It is important that the stated benefits of the proposals are also the subject of robust assessment so they can be given appropriate weight in applying the planning balance	<p>The topics listed have been reviewed, the results of which can be found in the following documents.</p> <p>ES Chapter 12 – Health (App Doc Ref 5.2.12) [APP-044] ES Chapter 15 – Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034] ES Chapter 19 – Traffic and Transport (App Doc Ref 5.2.19) [AS-038] ES Chapter 18 – Odour (App Doc Ref 5.2.18) [APP-050] and the Odour Management Plan (Appendix 18.4) (App Doc Ref 5.18.4) [AS-106]</p>

Table 4-23 Julian Francis (56336)

Reference	Relevant Representation Comment	Applicant's Response
1	<p>Joint response made by Ian Smith of Cheffins on 14 September 2020 together with legal advice from Howes Percival and an Opinion from Mr Lockhart-Mummery QC of Landmark Chambers dated 5 January 2021. The Opinion highlighted the “legal and process difficulties” facing this project and the grounds on which it is proposed.</p>	<p>The Applicant notes the complete written Opinion referred to in the stakeholder's Relevant Representation has not been provided to the ExA, therefore, the Applicant does not comment on the detail of it.</p> <p>Notwithstanding the above, the Applicant disagrees with the points made in these documents.</p> <p>The ExA should also note those documents are over two years old.</p>
2	<p>Use of Statutory Powers – We questioning the whole principle of relying on statutory powers when AW will be significantly benefiting from this relocation. We understand that HIF funding requirements are weighted in favour of AW customers and the local community but there is no transparency about the scheme at this juncture. We assume that a detailed costing has been prepared in order to have secured the provisional funding although this has not been shared.</p>	<p>The Applicant is using the Planning Act 2008 to apply for a Development Consent Order in accordance with the Section 35 Direction issued by the Secretary of State.</p> <p>Details regarding the funding of the Proposed Development can be found in the Funding Statement (App Doc 3.2) [APP-013].</p>
3	<p>Long Term Vision – it appears that site 3 has been selected for a number of reasons and not with any longer-term vision in mind. We have the following observations:</p> <p>a. Site 3 is within the HIF funding area and hence the facility could not apparently be located away from the City as it would not then benefit from the £227 million grant funding.</p>	<p>The Applicant refers the stakeholder to the Site Selection Reports (App Doc Refs 5.4.3.2 to 5.4.3.4) [AS-075 to 078] and Site Selection and Alternatives Chapter (App Doc Ref 5.2.3) [AS-018].</p> <p>The Applicant refers the Stakeholder to the Environmental Statement (App Doc Ref 5.1 and subsequent documents) [AS-032] and subsequent documents] and the LERMP (App</p>

	<p>b. It does not take the opportunity to move the treatment works further away from the City. We believe that this is partly due to it being less expensive to construct and operate as proposed, the latter being a cost AW will bear once operational.</p> <p>c. From an engineering perspective it is apparently not possible to build the new facility near Waterbeach. If that is the case, it does question why these sites were considered as possible locations in the first place?</p> <p>d. A great deal is placed on generating green energy, creating new wildlife habitats and improving access to the countryside. All of these can be achieved on the land without building a new water treatment works.</p> <p>e. The site is owned by one landowner which is more convenient for AW.</p>	<p>Doc Ref 5.4.8.14) [AS-066], all of which contains details of the environmental benefits.</p> <p>Land ownership did form part of the assessment criteria for site selection (see Site Selection Reports (App Doc Refs 5.4.3.2 to 5.4.3.4) [AS-075 to 078]) but, as explained in those reports, it was not the sole or predominant reason for selecting this site.</p>
4		Not used by the stakeholder.

5	<p>Low Carbon – AW make the claim that the new facility will be “operationally net zero carbon”. It would be interesting to learn about the carbon impact created by decommissioning the existing facility and building the new one.</p>	<p>The Applicant refers the stakeholder to ES Chapter 10 - Carbon (App Doc Ref 5.2.10) [APP-042] which provides an assessment of carbon emissions and proposed mitigation measures for the land use changes, decommissioning of the existing facility, construction of the Proposed Development (including embedded carbon in materials) and the operation of the Proposed Development.</p>
6	<p>Additional land take – despite requests AW have not been able to demonstrate why they require so much mitigation land.</p>	<p>The reasons for the need to acquire land from the stakeholder is explained in section 5.5 of the Statement of Reasons (App Doc Ref 3.1) [AS-143].</p> <p>The Applicant has explained and demonstrated the need for the land to be acquired from the stakeholder. The Applicant refers the stakeholders to the notes of the meeting held on 11 May 2022.</p>
7	<p>We understand that additional comments can be added in due course.</p>	<p>The Applicant would note that Affected Persons should not ordinarily raise new points in subsequent submissions that were not covered by their relevant representations, unless they have been asked to do so by the ExA.</p>

Table 4-24 P X Farms Limited (56346)

Reference	Relevant Representation Comment	Applicant's Response
None given	The works associated with the construction and ongoing operation of the site will impact PXF's farming activity which is nearby to the proposed site.	The Applicant understands that the stakeholder operates a large contract farming business across a number of locations. The Applicant's agent has been in contact with stakeholder. Whilst the impact to the stakeholder's farming business partly operated on parcels 038a, 038b, 038c, 038d, 038e, 042a, 042b, 042c, 042d, 042f (see Land Plans) (App Doc Ref 4.4) [AS-151] will be unavoidable, given the need to acquire that land for the proposed WWTP, it is not anticipated that the impact to the stakeholder's wider business will be significant. Where there is an impact, the stakeholder will be entitled to make a claim for any losses, which will be assessed by the Applicant in accordance with the Compensation Code.

Table 4-25 Queen's College, Cambridge (56384)

Reference	Relevant Representation Comment	Applicant's Response
None given	We have not received any communications from Anglian Water or their agents in respect of this scheme, we therefore reserve the right to make additional comments once more detail has been provided on the scheme.	The stakeholder has a Category 2 interest in respect of a restriction on disposition of the registered estate under clause 16.1 of a Promotion & Option Agreement dated 12 September 2019. This is in respect of plots 069a, 070a and 070b. The Applicant has sent both s44 notices and s56 notices to the Stakeholder by recorded delivery (The Applicant has confirmation from Royal Mail that these notices were delivered). The Applicant has contacted the stakeholder to understand what further information is required to understand the impacts caused by the scheme.

Table 4-26 Wendy Rose (56167)

Reference	Relevant Representation Comment	Applicant's Response
None given	We would like to state a claim of interest that when [Redacted] was first sold a clause was put on for a lifetime financial claim to the family of Mr and Mrs D S Clark for any development that may arise.	The Applicant understands that the stakeholder has the benefit of an overage over Northern Bridge Farm, Fen Road. The Applicant only intends to acquire a Transfer Tunnel restrictive covenant to restrict the use of the surface of a small area (see parcel 016a on Sheet 2 of the Land Plans (App Doc Ref 4.4.2) [AS-151]). This is required to protect the Transfer Tunnel. The Applicant does not intend to acquire any of the freehold to the land. The Applicant does not anticipate any impact on the Stakeholder's financial claim over the land. In the event of a claim for compensation from the stakeholder, the Applicant will assess it in accordance with the Compensation Code.

4.3 Marshall Group Properties Limited (MGP)

Table 4-27 Marshall Group Properties Limited

Reference	Relevant Representation Comment	Applicant's Response
1.2	MGP has been involved in all pre-submission stages of the DCO process, providing responses to consultations and liaising with Anglian Water to ensure the proposals have soundly and robustly considered the potential impacts of the scheme, whilst also taking account of current and future development on the eastern side of Cambridge.	The Applicant notes the engagement and will continue to liaise with MGP as required throughout the Examination process, and the construction and operational phases of the Proposed Development.
2.3	MGP's main interests in the examination of Anglian Water's DCO application for the new WWTP are:	The Applicant notes the stakeholder's main interests in the Examination and will liaise with the stakeholder about its interest, either through the Examination process or, where relevant, in its role as the statutory waste water undertaker for the area.

Reference	Relevant Representation Comment	Applicant's Response
	<p>1. the continuing safe operation of Cambridge Airport, until such a time as Marshall Aerospace has relocated and the runway is no longer in operation;</p> <p>2. ensuring that the capacity of the proposed new WWTP is sufficient to accommodate both existing development and future development identified through the emerging Greater Cambridge Local Plan (which extends to 2041, but identifies development beyond the Plan period); and</p> <p>3. ensuring that the design and specification of the sewage works is compatible with committed and expected large scale developments to the east of Cambridge, and will not cause undue constraint, nuisance or disturbance to the amenity of any future residents, or fail to optimise opportunities for connectivity between the new facility and Cambridge East.</p>	
3.2	<p>The WWTP site is located beneath an 'Inner Horizontal Surface', which is a horizontal plane above an aerodrome and its environs whereby the height of buildings, plant and roof structures is restricted to ensure they do not interfere with Airport activities. The height of this surface at the proposed site is 55.82m AOD. If any structures exceed this height, then further consultation with Cambridge Airport should be sought to enable further Obstacle Limitation Surface (OLS) aeronautical studies to be completed.</p>	<p>The Applicant notes the comments and can confirm there are no heights that will exceed 555.82m AOD. The Applicant is, however, aware of the need to apply for a Tall Structures and Cranes permit. Within the Consents and Permits Register (App Doc Ref 7.1) [AS-123], included in the Applicant's Deadline 1 submission), the Applicant has included the need for a Tall Crane permit to cover the construction period of the Proposed Development.</p>
3.3	<p>In addition, the proposed site sits beneath the 'Instrument Flight Procedures' associated with Cambridge Airport; therefore, any proposed structure or construction equipment that is proposed above 15m above ground level will require further consultation with Cambridge Airport to enable any further aeronautical studies to be undertaken.</p>	<p>The Applicant repeats the comment given above for 3.2.</p>

Reference	Relevant Representation Comment	Applicant's Response
3.3	It is also requested that MGP has sight of the detailed Construction Environmental Management Plan when this is prepared so it can assess the potential impacts on the safe operation of the Airport.	The Applicant repeats the comment given above for 3.2. in addition, the Applicant's draft Construction Environmental Management Plan (App Doc Ref 5.4.2.7) [AS-057] is available for the stakeholder to review.
3.4	Waste water transfer facilities, by their operational nature, have the potential to attract large numbers of hazardous birds, including gulls, corvids and Starlings that will be attracted to food sources on site. Increased hazardous bird activity on, or directly over this site will result in increased risk to aircraft and cause potential safety issues.	The Applicant notes the comment made by the stakeholder but refers the stakeholder to the Applicant's draft Construction Environmental Management Plan (App Doc Ref 5.4.2.7) [AS-057].
3.5	The proposed location of the new WWTP nearer to Cambridge Airport has the potential to increase the risk of birdstrike with birds looking to utilise both the feeding and breeding opportunities present on site, thereby, increasing the strike risk due to movement of these birds through the critical airspace.	The Applicant notes the stakeholder's comment and refers the stakeholder to the Wildlife Hazard Management Plan (Environmental Statement - Volume 4 - Chapter 8 - Appendix 8.18) (App Doc Ref 5.4.8.18) [APP-103] which details how this risk will be mitigated.
3.6	Given Marshall Group's commitment to relocation of its Aerospace business, and ultimately closure of the Airport no later than 2030, MGP recognise that the construction phase commencing in the second half of 2024 and early stages of operation from 2028 onwards may coincide for a relatively short duration. However, the safe operation of the Airport remains a priority, and MGP would recommend continued close liaison between Anglian Water and Cambridge Airport to ensure these matters are considered and addressed. Cambridge Airport recommends that a Bird Hazard Management Plan is required to cover both the construction and operational phases. The precise content of this may vary depending on the respective phasing of construction of operations at the new plant, relative to the	The Applicant refers the stakeholder to the comments made in 3.5 above.

Reference	Relevant Representation Comment	Applicant's Response
	status of ongoing operations at Cambridge Airport and the timescale for closure of the Airport.	
3.7	If any of the above factors trigger a requirement for additional aeronautical studies to be undertaken, the cost of these studies will need to be covered by Anglian Water.	The Applicant notes the stakeholder's comment but cannot commit to a yet unknown expense.
4.1-4.5	<p>Throughout the pre-submission consultations, MGP has closely monitored the information published by Anglian Water in relation to the proposed capacity of the new WWTP and, in particular, the assumptions allowed for in relation to Cambridge East.</p> <p>4.2 Quod has reviewed the DCO application documents in this context. The Planning Statement asserts that capacity for Phases 1 and 2 will be sufficient to serve all existing and planned residential and commercial development within the Cambridge catchment as a minimum to 2041, based on existing commitments and emerging needs and allocations identified in the emerging Local Plan (with headroom should the housing requirement / target increase), as well as from strategic sites (i.e. Cambridge East, NEC and Waterbeach) beyond the next Local Plan period.</p>	The Applicant acknowledges this comment.
	In relation to the emerging Local Plan and the emerging needs and allocations contained therein, Greater Cambridge Shared Planning (GCSP) has made clear the critical importance of clarity on the sustainable supply of water to make meaningful progress with the Draft Local Plan (Regulation 18). GCSP is working with the water authorities and with Government to resolve the current concerns around water supply to the area.	The Applicant believes the stakeholder is combining comments about the provision of waste water treatment and clean water supply. The provision of clean water falls to Cambridge Water.

Reference	Relevant Representation Comment	Applicant's Response
	<p>4.4 However, given there remains a degree of uncertainty about short and medium term growth requirements. It is incumbent on Anglian Water to demonstrate that the new facility is being planned and phased to meet the full range of reasonably predictable scenarios for short, medium and long term growth in the catchment areas.</p>	<p>The Applicant refers to the capacity of the Proposed Development stated in the Planning Statement (App Doc Ref 7.50) [AS-128] and how growth requirements have been calculated.</p>
<p>4.6-4.8</p>	<p>From a review of the DCO application documentation, it is not immediately clear as to what assumptions have been made in the capacity modelling in relation to the future development of Cambridge East. Whilst the emerging Greater Cambridge Local Plan 'First Proposals' identifies the site for 7,000 homes and 9,000 jobs, MGP are exploring with GCSP a number of technical and design assumptions that could influence site capacity in future stages of the emerging Local Plan. As identified in the emerging Greater Cambridge Local Plan, a significant proportion of development identified in the 'First Proposals' is due to be delivered beyond the Local Plan period.</p> <p>4.6 Given the national importance of Cambridge, there can be no risk that the new facility is undersized and no risk that it could impose a constraint on future growth of the area. Anglian Water must be able to demonstrate the ability of the plant and the site to accommodate longer term growth.</p> <p>4.7 Consequently, Marshall wishes to register its interest in relation to the examination of plant capacity and it will seek absolute clarity that the scale of the new facility will be sufficient to cater, not only for the development of Cambridge East and North East Cambridge, but also for all other likely planned development in the catchment.</p>	<p>The Application acknowledges the concern and refers to the Design and Access Statement (App Doc Ref 7.6) [AS-168] which describes the objectives and the design principles and considerations that have informed site selection and design development of the proposed WWTP. In particular, Section 2.3 states: <i>"The proposed WWTP will be sized for a design horizon of 2041 based on a 300,000 population equivalent (PE). The design basis is in alignment with the population growth estimates being used in the emerging Greater Cambridge Local Plan."</i></p> <p>Figure 3.2 in the Environmental Statement - Volume 2 - Chapter 2 - Project Description (App Doc Ref 5.2.2) [AS-034] illustrates the operational years for Phases 1 and 2, with Phase 1 operating between 2028 and end of 2035, Phase 2 commencing in 2036 and expansion to full capacity also in 2036.</p> <p>The GCLP provides a current view of the growth in the Cambridge catchment until 2041. The Applicant has worked with the City Council and South Cambridgeshire District Council to ensure the proposed development allows for forecast growth proposed in the local plan. For example, the required additional capacity for the Waterbeach New Town development has been calculated from the build out rate of two developments, with the assumption that 3,000</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>4.8 Further, Marshall seeks clarity around how and when expansion of the facility may occur should development be delivered at a faster rate than is assumed within the emerging Local Plan.</p>	<p>properties will be built by mid-2030 and the remaining 7,000 properties built by 2050.</p>
<p>5.1</p>	<p>Hilson Moran have been instructed by Marshall to advise in respect of the water cycle and water management at Cambridge East. Hilson Moran have reviewed relevant documents submitted with the DCO in respect of these matters and are broadly supportive of the application from a water management perspective.</p>	<p>The Applicant notes the stakeholder support for the Application.</p>
<p>5.2</p>	<p>However, the potential to explore how MGP and Anglian Water might mutually benefit from opportunities to share finite resources that improve environmental and economic outcomes has been identified. Primarily MGP wishes to understand if treated sewage effluent can be procured as a valuable 'recycled' water product for Cambridge East, thus supporting its water efficiency ambitions. Specifically, the use of Treated Sewage Effluent (TSE) or Black-Water could significantly reduce the demand for potable water, which is ultimately abstracted from finite groundwater resources. Currently the new WWTP will process sewage and discharge to local watercourses. Opportunities for the recycling of water by Anglian or Cambridge Water should be explored.</p>	<p>The Applicant notes the comments and has engaged with stakeholders on this point. The future options for black water and other opportunities are outside the scope of the Application and the design of the Proposed Development. The Applicant will, however, continue the engagement with relevant stakeholders on this point and explore future possibilities.</p>
<p>5.3</p>	<p>MGP would also wish to understand any opportunity for the direct conveyance of foul water from Cambridge East. For example, it might be possible for MGP to convey foul sewage directly to the treatment works from any new proposed adoptable pumping stations and bypass the existing Anglian</p>	<p>The Applicant appreciates the stakeholder's comments, and the suggestion of a direct connection to the proposed WWTP, but this is outside the scope of the Proposed Development. All new connections would be managed via the standard application process and the provisions of the Water Industry Act 1991.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Water sewerage network (should it prove difficult for Anglian Water to accommodate the foul flows from Cambridge East into its existing sewerage network). Would the timelines for the two projects allow this?</p>	
5.4	<p>There are two other opportunities that any 'mechanism for exploring innovation' might initially consider. Both of these would be subject to their own techno-economic viability and regulatory appraisal to determine applicability:</p> <ol style="list-style-type: none"> 1. Procurement of waste heat or perhaps biomethane for Cambridge East: Hilson Moran understand that biomethane will be exported from the new WWTP and injected into the local gas network. Could this be conveyed to Cambridge East and combusted to provide heat and power? Alternatively, it is assumed the biomethane will be generated from Anaerobic Digestion process, which would also likely generate heat, which might also be used as a valuable waste product. 2. Procurement of renewable electricity for Cambridge East. The WWTP will generate renewable electricity. This renewable electricity could be conveyed to Cambridge East via an engineered connection, or perhaps virtual via a Power Purchase Agreement, to support the electrification of heat and transport at Cambridge and in support of Cambridge East's net zero-carbon ambition. 	<p>The Applicant acknowledges and appreciates the stakeholder's ideas, but they are outside the scope of the Proposed Development.</p>
5.5	<p>MGP would welcome a mechanism to explore possible innovation in the shared use of finite resources across two major built environment projects in relative proximity.</p>	<p>The Applicant will discuss its ideas, but this is outside the Application.</p>

Reference	Relevant Representation Comment	Applicant's Response
6.1	KMC Transport / Stantec are instructed to advise Marshall in respect of transport matters at Cambridge East and have reviewed Anglian Water's DCO documentation to ensure the proposed access and transport arrangements are robust and do not conflict with any proposals at Cambridge East.	The Applicant notes the stakeholder's comments in relation to transport matters.
6.2	The proposal for a Community Liaison Group and a Construction Forum to communicate activities during construction stages is welcomed as it is likely that construction activities at the Airport (including Marleigh, Springstead Village and the redevelopment of the airport itself) could coincide with construction at the Proposed Development (2024 – 2028), particularly if there are delays in starting construction. Marshall must be part of this group representing development at Cambridge East and Marleigh, and also ensuring close coordination with the developers at Springstead Village, particularly as traffic management measures around the site has potential to impact construction routings and users at Marshall sites.	The Applicant notes the stakeholder's request to be part of the Community Liaison Group.
6.3	The pedestrian and cycle improvements along Horningsea Road between A14 J34 and the site are supported, including the widened shared pedestrian/cycle track, improved crossing facilities at J34, the upgraded bridge parapet, new crossing on Horningsea Road and segregation of active users from HGV and car traffic, as well as the recreational opportunities through and beyond the site.	The Applicant notes the stakeholder's support for the pedestrian and cycle improvements.
6.4	The proposals that construction traffic will not coincide with the peak hours and ANPR will monitor the assignment of traffic locally are also supported.	The Applicant notes the stakeholder's support for the proposals for construction traffic and will continue to work with stakeholders on the finalisation of the Construction Traffic Management Plan (App Doc Ref 5.4.19.7) [AS-109] .
6.5	Future expansion of the facility beyond 2050 would be key to enable continued growth in Cambridge; however, the site access	The Applicant notes the stakeholder's concerns. The Applicant has engaged with the relevant Highway Authorities in the finalization of

Reference	Relevant Representation Comment	Applicant's Response
	<p>arrangements already appear to be close to capacity up to 2038. KMC Transport / Stantec are concerned that sufficient flexibility may not have been built into the site access proposals and operational access strategy to facilitate longer term growth beyond the Phase 1 operational phase, or in a situation where the volume or origins of vehicles entering and exiting the site differs from that tested within the Transport Assessment.</p>	<p>the junction capacity reports (see ES Volume 4 Chapter 19 Appendix 19.6 Junction capacity reports (App Doc Ref 5.4.19.6) [APP-147]. The Applicant does not anticipate significant increases in the volume of vehicles to the site in the event the infrastructure is upgraded to facilitate growth. The infrastructure is such that it will not generate an additional operational workforce.</p>
6.6	<p>The CTMP is welcomed, although emergency access routing for the Proposed Development should be agreed with Marshall in the event of issues on the A14 and options may directly impact Marshall sites in the east of Cambridge.</p>	<p>The Applicant does not believe this is necessary. The Applicant has engaged with the Emergency Services and they have confirmed the proposed emergency access is acceptable.</p>
6.7	<p>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.</p> <p>Specifically:</p> <ul style="list-style-type: none"> • Why the traffic data for the strategic road network junctions collected in December 2021 hasn't been re-validated with data from 2022 and whether there are implications for the capacity conclusions? • 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. • What assumptions were included for Cambridge East within the junction modelling? • How sensitive the conclusions regarding the performance of A14 J33 are in the event that the volume, timing or assignment 	<p>The Applicant notes the points and can confirm that the junction capacity and suitability of the access from the A14 has been assessed and determined as appropriate in conjunction with the relevant Highways Authority and is set out in Chapter 19 of the Environment Statement (App Doc Ref 5.2.19) [AS-038] and Appendices (App Doc Ref 5.4.19.1-9) [APP-141].</p>

Reference	Relevant Representation Comment	Applicant's Response
	of operational traffic varies from those within the Transport Assessment?	
6.8	Marshall seeks further clarity in respect of these queries as the examination process progresses.	The Applicant notes the stakeholder's interest in the Examination.
7.1	MGP is committed to ensuring that any future development at Cambridge East forms an integrated piece of both the City and its countryside and is exploring opportunities on-site and off-site to enhance biodiversity, recreational opportunities and connectivity to open space. MGP has been engaging with Anglian Water through a series of workshops to explore how the respective green infrastructure strategies could be conjoined.	The Applicant welcomes the stakeholder's involvement in exploring these opportunities.
7.2	Logika, on behalf of MGP, has reviewed all relevant documentation submitted with the DCO with regards to Green Infrastructure and Biodiversity. The review has not identified any potential concerns that need to be investigated at this stage with Anglian Water with regards to biodiversity and Green Infrastructure. Logika are supportive of the proposed major new green infrastructure that could, together with future green infrastructure proposals at Cambridge East, support a significantly enhanced green infrastructure resource for both people and wildlife within the local area, including by contributing to the local nature recovery network.	The Applicant notes the stakeholder's support for its proposals related to Green Infrastructure and Biodiversity.
7.3	More specifically, in reviewing the access proposals for recreation and open countryside proposed within the DCO submission documentation, it is clear that there is opportunity for green route / byway / footpath linkages through the area to link the green infrastructure associated with the WWTP with that intended to occur at Cambridge East. Discussions should continue between relevant parties including MGP, Anglian	The Applicant notes the stakeholder's suggestion and will consider it during the Examination.

Reference	Relevant Representation Comment	Applicant's Response
	<p>Water, the National Trust and GCSP (as well as other interested stakeholders) to optimise outcomes and to investigate a solution to achieving delivery of the Wicken Fen vision in this specific area.</p>	
8.1	<p>The latest information provided by Anglian Water provides an odour assessment. Air Quality Consultants, on behalf of MGP, has reviewed the odour assessment. The assessment includes modelling of potential odour emissions and operating conditions from a fully functioning sewage treatment works.</p>	<p>The Applicant notes the stakeholder's support for its assessment of odour management and control as part of the Proposed Development.</p>
8.2	<p>The approach taken by Anglian Water has been to embed odour mitigation in the design of the WWTP to reduce odours at source. Odours are much more effectively mitigated at source, as opposed to at a receptor and measures would be detailed in the Site's Odour Management Plan. Air Quality Consultants are supportive of this approach as it demonstrates a high level of confidence in Anglian Water's odour management and control at the site.</p>	<p>The Applicant notes the stakeholder's support for its proposals for odour management and control as part of the Proposed Development.</p>
8.3	<p>Whilst the approach will reduce the potential for odour generation, there are a number of minor technical issues with the submitted odour assessment that have the potential to combine to alter conclusions or reduce the headroom of the assessment. These includes a lack of consideration of the odour impacts during less-than-optimal conditions, missing details relating to the operational of the storm tanks, lack of clarity on the whole site's status under the Environmental Permitting Regulations and the impacts from decommissioning. These issues could impact on appropriate mitigations strategies; therefore, MGP seek clarification of the following:</p>	<p>The Applicant notes the points listed by the stakeholder and will engage with them to discuss how this has been considered during the course of the Examination. The Applicant would refer the stakeholder to chapter 5.6 of the odour impact assessment (App Doc Ref 5.4.18.2), where the Applicant has identified the areas and thus sources of the existing Cambridge WWTP that cause intermittent odours from its operation, as well as identified areas that pose a risk of odours from its operation of the existing Cambridge WWTP and other WWTPs. As a result, the design of the proposed WWTP has incorporated mitigation measures.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<ul style="list-style-type: none"> the organisation who is responsible for ensuring the site's Odour Management Plan is sufficient and the process for resolving any issues relating to odours from the site, regardless of the operational cause; and the likely frequency of storm tank usage and the procedure for drawdown and cleaning. 	
8.4	<p>Whilst it is appreciated that the odour impacts are likely to be low at the nearest Marshall landholding, given the distance from the main works of the WWTP (approximately 1.5 km), the above details are considered a critical component of any sustainable odour management plan.</p>	<p>The Applicant notes the stakeholder's comment and will investigate the points listed in 8.3 above.</p>

4.4 Save Honey Hill Group (SHHG)

Table 4-28 Save Honey Hill Group (SHHG)

Reference	Relevant Representation Comment	Applicant's Response
3.; 3.1; 3.2	<p>As the Applicant recognises in section 3.1 of the Planning Statement (AW 7.5), the DCO application must be determined pursuant to either s.104 or s.105 of the Planning Act 2008 (PA 2008). Different considerations arise for the Examining Authority (ExA) depending on which provision applies. This section sets out SHH's position on the relevant decision-making framework.</p> <p>3.2 Section 104, 105 and Section 35 Direction It is the Applicant's case that because the project is the subject of a section 35 direction, section 104</p>	<p>The Applicant provided a legal submission on 29 September 2023 in response to the ExA's request for additional information regarding the applicability of Sections 104 and 105 of the Planning Act 2008 ("the 2008 Act") to the determination of the Application. The Planning Inspectorate requested this legal submission as part of its procedural decision dated 10 August 2023. (App Doc Ref 7.15) [AS-126].</p> <p>In summary, it is the Applicant's submission that the Application is one to which the NPSWW applies and therefore, pursuant to Section 104, the Secretary of State must follow the</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>of the Planning Act 2008 applies. This is wrong in law; see EFW Group Limited v Secretary of State [2021] EWHC 2697 (Admin) at [58-61] per Dove J. The Applicant's approach is evident from the Planning Statement (AW 7.5) section 3, in particular, paragraph 3.1.8, which asserts that because the project is the subject of a section 35 direction, section 104 should apply. See also 6.1.5. This is simply wrong. The direction in this case dated 18 January 2021 is procedural. It does not (and could not) change the nature of the project. It is unfortunate that the Applicant has chosen not to set out the legal basis for its position within the application documents (see what is said at 6.1.5 of the Planning Statement, that its position 'will be supported by legal submissions in due course'). There is no good reason why it could not explain its position, on a key issue in the application, within the application documents. Its choice in this regard has prevented a fair opportunity for a response to be made in this Relevant Representation. Further submissions may well have to be made in due course to remedy that position. It is respectfully suggested that the ExA requests further information from the Applicant on this matter, which can then be the subject of a response.</p>	<p>decision-making framework of that section in which the NPSWW has primacy. Nevertheless, and notwithstanding the Applicant's stated position, in the event that the ExA and the Secretary of State agree with the Applicant that s104 applies, the Applicant would still urge both the ExA and the Secretary of State to indicate what their decision would have been had they decided the application under s105. The Applicant has made clear its desire to implement the Project as soon as possible post-consent and adopting this approach would reduce the risk of any delay arising from legal challenge on the point.</p> <p>These points were also discussed at Issue Specific Hearing 2, 18 October 2023. The transcript (Document Reference EV-005d) is available and the Applicant has also submitted a summary (Document Reference 8.3), this noted that the Applicant stated that there is a clear enunciation of the correct approach in EFW Group Ltd v Secretary of State for Business, Energy And Industrial Strategy [2021] EWHC 2697 (Admin) (the "Energy from Waste case") at paragraph 60 of the judgment. The Secretary of State has a discretionary power under Section 35 to treat a development as a development for which development consent is required. It is a power to direct the project in. That can be contrasted with Section 14 which defines NSIPs. Whether or not S.104 applies turns on the terms of the relevant NPS. In the case of the Waste Water NPS, projects which are directed in are included, by virtue of Section 35 (see further below).</p>

Reference	Relevant Representation Comment	Applicant's Response
3.3	<p>While the Applicant states that '[it] does not seek to argue that the project is a nationally significant infrastructure project within the meaning of section 14(1) Planning Act 2008' (AW 1.8 Schedule of Amendments to DCO Application p.2), it also seems to intimate that the project might exceed the threshold to be considered to be an NSIP (AW 1.8 at pp.6-7). There is an obvious conflict here and lack of clarity in the documents on the Applicant's position, but if the Applicant does consider that the project might exceed the threshold in s.29 Planning Act 2008 that too is wrong. The waste water capacity of the plant is well below the relevant threshold and the Applicant is unable to point to any support in statute, case law, policy or guidance for the proposition that imported sludge should be included in the calculation (as it accepts, see AW1.8 p.7). AW has provided very little information in the DCO application about the planned design capacity of the new works, apart from simple headline figures, unsupported by calculations, first made public in 2019, in the Statement of Requirement (AW 7.2) and elsewhere. These are now set out in the application, in para 2.15.2 of the ES Project Description (AW 5.2.2), as a Phase 1 WWTP to provide full treatment capacity for 275,000 Population Equivalent (PE) and, in Phase 2, 300,000 PE to be provided 'some time 2036 to 2050'. That document states that sludge treatment capacity will be for 16,000 tonnes dry solids, sufficient for a population equivalent of 300,000. This latter figure differs from statements elsewhere that sludge treatment capacity of 16,000 tonnes dry solids would equate to 548,000 PE</p>	<p>The Applicant sets out its position on this point in the legal submission (Document Reference 7.15) [AS-126]. In summary, the Project requires development consent by virtue of a direction from the Department for Food, Environment, and Rural Affairs ("DEFRA") made pursuant to Section 35 the 2008 Act. The direction confirms that the Application is for development which "by itself, is nationally significant" (for the reasons set out in the Annex to the direction) and therefore must be treated as development for which development consent is required. (The direction is dated 18 January 2021 and is appended to the Planning Statement (at Appendix 3) (App Doc Ref 7.5) [AS-128].</p> <p>The Applicant sought the direction to eliminate any ambiguity as to whether the Project exceeds the threshold set out in set out in s29(1) of the 2008 and therefore whether it is one which for which development consent is required. That ambiguity arises due to uncertainties in the factors which inform the calculation of "population equivalent" for the purposes of s29(1)(b). In essence, if that calculation includes the treatment of "wet sludge" then the threshold is met, if it does not then it is not. As noted at footnote 4 on page 105 of the Planning Statement (App Doc Ref 7.5) [AS-128], wet sludge is typically 97% waste water having only completed an initial solid screening process prior to transportation to CWWTP.</p> <p>As far as the Applicant is aware there has been no determination on the point through the Courts, and in anticipation of potential arguments in principle being raised as</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>(see e.g. Planning Statement at para 2.2.11). There is no coherent explanation or evidence in the application documents that establishes (i) what the capacity of the existing works to be relocated is (ii) the additional capacity to replace the existing Waterbeach works and to meet needs of the new town, or (iii) the additional capacity to allow for future changes in demand arising from other future housing and other forms of development in the catchment area and other future requirements including those from climate change and the need for more stringent discharge standards etc.</p>	<p>to whether the Project qualified as a NSIP and therefore required development consent, obtained the direction to put the question of whether the Project could be authorised under the 2008 Act beyond doubt. However, whilst the making of the direction therefore provides certainty that the Project is able to be promoted under the 2008 Act, it does not determine that the project is a “nationally significant infrastructure project” for the purposes of s29(1).</p> <p>As noted at paragraph 3.1.8 of the Applicant's Planning Statement (App Doc Ref 7.5) [AS-128]:</p> <p>“It is the Applicant's opinion that the NPSWW has effect in this instance because of the terms of the s35 Direction dated 14 May 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.”</p> <p>Accordingly, and without prejudice to being able to pursue the point in further cases, the Applicant does not seek to take the point that the Project meets the threshold in s29(1) in relation to the Application. In the Applicant's submission, it is not therefore necessary for the ExA or the Secretary of State to reach a finding on the point. Furthermore, the Applicant does not consider that it is necessary for the ExA nor Secretary of</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>State to reach a conclusive decision on the issue in order to determine the Application. This is because the Project clearly satisfies the statutory tests under either s104 or s105, and the Applicant requests that the ExA includes within its report assessments of the Application under both sets of statutory criteria.</p> <p>As above, these points were also discussed at Issue Specific Hearing 2, 18 October 2023. The transcript (Document Reference EV-005d) is available and the Applicant has also submitted a summary (App Doc Ref 8.3).</p>
3.4	<p>Application of section 105 Whether s.104 applies depends, as recognised by the Applicant in para 3.1.3 of the Planning Statement, on whether an NPS 'has effect in relation to development of the description to which the application relates'. Whether a NPS has effect depends in turn on the interpretation of any relevant NPS. If, on the correct interpretation of any relevant NPS, that NPS does not 'have effect' for the purposes of the application, an s.35 direction cannot have the effect of nonetheless bringing it within the scope of the decision-making framework under s.104 (EFW Group Limited v Secretary of State for Business, Energy and Industrial Strategy [2021] EWHC 2697 (Admin) at paras.58-60). In terms of the interpretation of the NPSWW, which is the relevant NPS for the present application, the Applicant appears to rely wholly on footnote 6 to para 1.2.1 to argue that a development that is subject to a s.35 direction falls within the scope of the NPSWW. However, it is clear from</p>	<p>The Applicant sets out its position on this point in the legal submission (App Doc Ref 7.15) [AS-126].</p> <p>The applicant submits that the question of whether s104 or s105 of the 2008 applies turns on the terms of the Waste Water NPS as was held by Dove J in EFW Group Ltd v Secretary of State for Business, Energy and Industrial Strategy ([2021] EWHC 2697 (Admin)) and not simply by whether the threshold in s29(1) is exceeded. The judgment is attached at Appendix A of the Legal Submission on the Applicability of S104 and S105 Planning Act 2008 (App Doc Ref 7.15) [AS-126]</p> <p>At paragraph 60 the following is stated. (the Applicant's emphasis).</p> <p><i>The question arises as to whether or not the section 35 direction which was made in relation to WKN has the effect of bringing it within the scope of the decision-making framework</i></p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>the main body of the text at section 1.2 of the NPSWW (entitled 'Infrastructure covered by this NPS') that the NPS applies to waste water NSIPs, the Thames Tunnel project, associated development and ancillary matters. There is no reference in the main body of the text to waste water development in respect of which a s.35 direction has been made. The footnote, which is inserted after the words 'the Planning Act 2008', merely identifies that a direction can be made under s.35. That interpretation is also supported by para 3.1.2 NPSWW, which when discussing the infrastructure covered by the NPS, refers only to wastewater NSIPs, not projects which fall below the threshold but are brought into the DCO process via a s.35 direction. With regard to the Applicant's main argument that the s.35 direction, which identifies the PD as 'nationally significant', brings the PD within the scope of s.104, this is clearly incorrect in the light of the recent High Court decision in EFW. It is a prerequisite for a s.35 direction that the Secretary of State considers a project is of national significance. Therefore, in the light of the EFW case, a finding that a project is 'nationally significant' cannot be sufficient to bring an application into the scope of s.104 PA 2008 if the NPS does not have effect for that project. While the Secretary of State could have directed that s.104 applies to the Application pursuant to s.35ZA (5) PA 2008, he did not do so. SHH considers therefore that the PD must be assessed under s.105 PA 2008. For decisions which proceed under s.105, s.105(2) provides that the Secretary of State must have regard to any local impact</p>	<p><i>pursuant to section 104. In my view it does not. I am unable to accept the submission that the terms of section 35(1) have the effect of turning a project or development which does not fall within the definition of NSIPs provided within sections 14 and 15 of the 2008 Act into a project which has such a designation. The words "be treated as development for which development consent is required" simply have the effect of making the proposed development subject to the decision-making framework contained within the provisions of the 2008 Act. They do not change the understanding of the proposal as not being within the definition of an NSIP, any more than they change the physical nature of what is comprised within the development. <u>More particularly, they cannot have the effect of altering the scope of an NPS which has been drafted specifically to apply only to those projects that are within the definition of an NSIP.</u></i></p> <p><i>The development in the EFW case related to an energy from waste development to which the national policy statement on renewable energy EN-3 potentially had effect for the purposes of s104. In regard to the highlighted section, the Applicant notes (as did the Court as para 44 of its judgement) that EN-3 expressly states at paragraph 1.8.1 that it covers energy from biomass/waste over 50MW (the proposal in the case fell below that threshold). It makes no mention of section 35 of the 2008 Act. The approach under the energy NPS can therefore be distinguished from others on that basis.</i></p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>report (s.105(2)(a)), any matters prescribed in relation to development of the description to which the Application relates (s.105(2)(b)) and any matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision. As no NPS has effect and there is therefore no requirement to decide the Application in accordance with the NPS (as in s.104(3)), the application should be determined primarily in line with the applicable development plan and national policy, although the NPSWW will also be a material consideration. As conceded by the Applicant, where the NPSWW does not have effect (and therefore s.105 applies), the presumption in favour of granting consent for wastewater NSIPs set out at para 3.1.2 NPSWW will not apply (Planning Statement, para 3.1.9) and the National Planning Policy Framework (NPPF) and is the appropriate national framework for determining this application. Significant weight must therefore be given in the determination of the Application to the relevant policies in the adopted development plan, namely the South Cambridgeshire Local Plan 2018 (SCLP), the Cambridge City Local Plan 2018 (CLP), the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021 (MWLP) and the Waterbeach Neighbourhood Plan 2022 (WNP), as well as those in the National Planning Policy Framework (NPPF). Some weight can be given to the NPSWW as a material consideration. Limited weight if any should be given to emerging policy in the North East Cambridge Area Action Plan (NECAAP) and the Greater</p>	<p>In support of this submission, the Applicant draws the attention of the ExA in its legal submission to:</p> <p>The National Policy Statement for National Networks which states (para 1.3):</p> <p><i>Where a development does not meet the current requirements for a nationally significant infrastructure project set out in the Planning Act (as amended by the Threshold Order), but is considered to be nationally significant, there is a power in the Planning Act for the Secretary of State, on application, to direct that a development should be treated as a nationally significant infrastructure project. In these circumstances any application for development consent would need to be considered in accordance with this NPS. The relevant development plan is also likely to be an important and relevant matter especially in respect of establishing the need for the development.</i></p> <p>And at paragraph 1.5:</p> <p><i>The great majority of nationally significant infrastructure projects on the road network are likely to be developments on the Strategic Road Network. Development on other roads will be nationally significant infrastructure projects only if a direction under Section 35 of the Planning Act has been made designating the development as nationally significant. In this NPS the 'national road network' refers to the Strategic Road Network and other roads that are designated as nationally significant under Section 35 of the Planning Act.</i></p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Cambridge Local Plan (GCLP), which have not yet been submitted for examination.</p>	<p>It is noted that Silvertown Tunnel, the Norwich Northern Distributor Road, the Lake Lothing Third Crossing and the Great Yarmouth Third Crossing projects were all determined under s104 of the 2008 following s35 directions in reliance upon these provisions (See in particular the ExA recommendation report for Silvertown Tunnel – paras. 3.3.4 and 3.3.8).</p> <p>As above, these points were also discussed at Issue Specific Hearing 2, 18 October 2023. The transcript (Document Reference EV-005d) is available and the Applicant has also submitted a summary (App Doc Ref 8.3).</p>
<p>4.1</p>	<p>The Applicant's case on need is flawed, i.e., it has not demonstrated any need for new waste water infrastructure. Rather, the Applicant relies on an alleged need to release the land on which the existing Cambridge Water Recycling Centre (CWWTP) sits for housing (See for example Planning Statement, AW 7.5 para 2.1.1.) That is not a type of need which is recognised in the NPSWW. SHH will demonstrate that there is no operational need for the PD, no support for the PD in relevant development plan policy and that the Applicant's case on housing and employment need is unsupported by evidence.</p>	<p>Please see the Applicant's Legal Submission on the Applicability of S104 and S105 Planning Act 2008 which addresses the point that the Project is not named in the NPSWW (Document Reference 7.15; AS-126).</p> <p>SHH is correct, there is no operational need for a new or relocated WWTP for 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 (i.e. other Development Plan allocations and any new allocations which are made in the emerging GCLP) up to 2041, which fall in the combined</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Cambridge and Waterbeach waste water drainage catchment (see Planning Statement (Document Reference 7.5, AS-128) paras 2.2.3-2.2.15, 2.4.3 - 2.4.6 and 2.4.24). 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).</p> <p>Need for proposed WWTP relocation (as described in section 2.1 of the Planning Statement, Document Reference 7.5, AS-128) is best described as a need to deliver a vacated site in accordance with the terms of the Housing Infrastructure Fund (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 appended to the Planning Statement) 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.</p> <p>The Applicant also sets out the local policy context in section 2.3 of the Planning Statement. This section describes both the historic and present policy position and that emerging from the North East Cambridge Area Action Plan (NECAPP) and emerging Greater Cambridge Local Plan.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>As described in the Planning Statement, Cambridge City and South Cambridgeshire District Councils have confirmed (most recently at South Cambridgeshire District Council Cabinet on 6 February 2023) through the Greater Cambridge Local Plan: Development Strategy Update (Regulation 18 Preferred Options), January 2023, which draws on representations to the GCLP First Proposals consultation held in 2021 and evidence completed since then, 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 stage of GCLP Draft Plan (Regulation18) consultation.</p> <p>Resolution by the Councils to approve the Development Strategy Update (Regulation 18 Preferred Options) report on 6 February 2023 provides confidence of the Councils’ position that NEC should form one of three key strategic sites which will form “central building blocks of any future strategy for development” in the next stage of GCLP Draft Plan (Regulation18) consultation. Based on up to-date evidence and with the benefit of consultation this means that the NECAAP and GCLP have effectively reached a stage where the evidence envisaged by paragraph 3.35 of the adopted Cambridge Local Plan 2018 (and paragraph 3.34 of the South Cambridgeshire Local Plan 2018) has been assembled and that it can be reasonably concluded that:</p> <p>(a) the optimal form of regeneration of NEC is total removal of the existing Cambridge WWTP; and</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>(b) consolidation would not release enough land for significant housing and therefore would not secure HIF, and relocation is not viable without external funding so consolidation is not viable (as per the Chronology report) - see Chapter 3 of the Environmental Statement (Site Selection and Alternatives, Application Document Reference 5.2.3); and</p> <p>(c) the current site is the most sustainable location suitable and available (subject to the CWWTP DCO being approved) in Greater Cambridge as part of meeting objectively assessed needs to 2041; and</p> <p>(d) based on the evidence provided in this DCO application relocation is viable, feasible and sustainable, subject to the agreed HIF funding and approval of the CWWTP DCO.</p>
4.2	<p>The Applicant explicitly accepts that 'there is no operational need for the relocation of the Cambridge WWTP or environmental reasons which would result in a need for relocation' (AW 7.5 para 2.4.24). It concedes that because the project is not identified in the Environment Agency's (EA) Water Industry National Environment Programme (WINEP), need cannot automatically be assumed, and therefore it is necessary to demonstrate how the project is responding to the need identified in the NPSWW. (AW 7.5 para 2.4.26). No assessment of how the project responds to need identified in NPSWW has been undertaken, depriving SHH of a fair opportunity to respond to the Applicant's case at this stage. To the extent that the Applicant appears to rely on compliance with NPSWW as demonstrating need, accordance with its provisions (which is not accepted by SHH) cannot generate a need for the</p>	<p>On the first point, SHH is correct, the Applicant agrees, the proposed development is not currently named in the Water Industry National Environment Programme (WINEP).</p> <p>NPSWW para 2.5.3 refers specifically to new waste water treatment infrastructure projects where operational need and/or for statutory environmental reasons will have already been demonstrated by their inclusion in NEP. However, nothing in the NPSWW precludes demonstration of need in other ways. NPSWW para 2.5.4 anticipates further "unforeseen" projects (including, but not limited to, those which can similarly be considered to be needed by inclusion in an NEP). Section 2.3 identifies four main 'drivers' for new and improved waste water infrastructure, none of which limit how new waste water treatment infrastructure should be delivered.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>development where there is no operational requirement for relocation. First, the Applicant acknowledges that the PD is not identified in the WINEP and therefore need for the PD cannot be assumed (Planning Statement, paras.2.4.23 and 2.4.26). NPSWW deals with the need for new waste water infrastructure at section 2.5. This section is clear on its face that need for new waste water infrastructure projects will only have been demonstrated where that project is in WINEP or listed in the NPS, namely the Deephams Works and the Thames Tunnel. While the Applicant relies on the reference to 'unforeseen projects' in para 2.5.4 NPSWW as indicating that need could be demonstrated in other ways, in order to be considered as being needed such unforeseen projects must satisfy the criteria in para 2.5.3, namely the EA must have concluded that the project is necessary for environmental reasons and included it in the WINEP. Second, the Applicant also concedes that the PD will never come forward in WINEP because 'despite the environmental and economic benefits arising from the PD, there is no operational need for the relocation of the Cambridge WWTP or environmental reasons which would result in a need for relocation' (Planning Statement para 2.4.24). Therefore, notwithstanding the Applicant's reliance on the potential for increased capacity and treatment of storm flows at the relocation site (see for example Planning Statement paras 2.2.9 and 2.2.10) and reference to need for the PD 'in water treatment terms (Planning Statement para 2.2.15) there is in fact no operational or environmental need for</p>	<p>On the second point regarding benefits from the Proposed Development, the Applicant describes these at paragraphs 6.2.13 to 6.2.14 of the Planning Statement (App Doc Ref 7.5) [AS-166].</p> <p>The most significant benefit is that decommissioning and release of the existing WWTP site will enable regeneration and the creation of a highly sustainable new city 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).</p> <p>The Applicant agrees that many of the operational benefits of the Proposed Development could be achieved to some extent at the existing facility but this would depend on funding being secured. Improvements to storm resilience (from use of tunnel for attenuation) and achievement of the same level of operational and capital cost efficiencies and operational carbon neutrality would be more difficult and might be delayed and/ or incremental depending on the 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</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>additional capacity of treatment. This is further confirmed by the Applicant's acknowledgement that 'in the absence of consent for this DCO project, Cambridge and Waterbeach's combined and growing waste water recycling needs will need to be served at the existing Cambridge WWTP' (Planning Statement para 2.3.34). The Applicant does not argue that those needs could not be served by the existing Cambridge WWTP. Therefore, it is clear that the potential for operational improvements is a benefit of the development. Increased capacity, treatment of storm flows or the potential for improvement of the water quality of the River Cam cannot be relied on as part of the need case, as if they were needed, the requirement for such actions would be included in WINEP. Third, the Applicant asserts that a project could be needed if it accords with the wider principles in NPSWW, and notes that references in the NPSWW to population growth (for example paras 2.3.8 and 2.3.9) are expressed in general terms (Planning Statement para 2.4.25). However, paras 2.3.8 and 2.3.9 NPSWW are concerned with the impact of population growth on the ability to meet legal standards for water quality (para 2.3.8) and on the capacity of the existing sewerage system (para 2.3.9). They are therefore concerned with operational need and not any need or demand for the release of land on which an existing WWTP is located. Similarly, the other 'main drivers of demand' in section 2.3 of NPSWW all relate to operational factors, namely environmental standards, the impact of climate change on sewer and treatment capacity and the resilience of existing</p>	<p>open spaces, enhanced education and recreational opportunities.</p> <p>If not replaced by the Proposed Development, the existing WWTP would require continued incremental investment over the upcoming business plan periods (water and waste water companies are required to submit business plans to OFWAT to release funding every 5 years) to progressively increase its growth capacity and ability to meet tightening discharge permit obligations. The funding is identified at each of the Price Review business plan submissions where growth and regulatory changes are forecasted and budgeted for and need is prioritised across the entire network of Anglian Water's assets. If the DCO is granted and the proposed WWTP is delivered then this investment can be reinvested into other parts of the Applicants asset base.</p> <p>On the third point regarding accordance with the NPSWW, as stated above, and the demonstration of need 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</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>infrastructure. The last of these refers to the potential need for 'the replacement of infrastructure in poor condition, or at the end of its life cycle' – neither of which are claimed in relation to the existing CWWTP (para 2.3.11 NPSWW). The Applicant asserts in the Planning Statement that a need can also arise for the purposes of granting development consent where there is 'the need for land occupied by existing facilities for other compelling reasons' (e.g., at paras 2.4.27 and 6.2.2). However, such a concept does not find any expression anywhere in the NPSWW, PA 2008 or in any case law and appears to have been conjured up by the Applicant.</p>	<p>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).</p>
4.3	<p>Lack of Development Plan Policy Support for Relocation</p> <p>The PD is not an NSIP and therefore should be tested under s.105 PA 2008, primarily against the adopted development plan. The relocation of the CWWTP is not supported by the adopted local plans. Emerging policy is also at an early stage of development (meaning little if any weight should be given to it) and is described as being 'contingent' and 'predicated' on the outcome of this Application rather than requiring or formally supporting the application to make a DCO. The relocation site is not proposed for release from the Green Belt in the emerging GCLP, nor is there any suggestion that exceptional circumstances exist which would justify such release. There is therefore no material policy support for the PD in the adopted or emerging Local Plans. The existing Cambridge WWTP site is identified in the</p>	<p>The Applicant refers to the Secretary of State's (SoS) direction under s35 of PA 2008 to treat the Proposed Development as a 'project of national significance' for which development consent is required (see the Planning Statement (App Doc Ref 7.5) [AS-166] where the SoS Direction is appended).</p> <p>The SoS describes the Project as "nationally significant". This is an exercise of planning judgment and does not make the Project an 'NSIP'.</p> <p>As per the responses above and outlined in the Applicant's Legal Submission on S104 and S105 of the Planning Act 2008 (App Doc Ref 7.15) [AS-126], the Applicant does not seek to take the point that the Project meets the threshold in s29(1) in relation to the Application.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>adopted Local Plans as part of a wider site allocation for mixed-use development that is employment-led with a range of supporting commercial, retail, leisure, and residential uses, subject to acceptable environmental conditions (CLP Policy 15; SCLP Policy SS/4). The adopted policies emphasise (in the third paragraph of CLP Policy 15 and Point 3 of SCLP Policy SS/4) that the amount of development, site capacity, viability, timescales, and phasing of development will be established through the preparation of an Area Action Plan (AAP) for the site. The supporting text to the policies recognises that the policy requirements could be satisfied through the onsite redevelopment of the CWWTP, with a smaller footprint (CLP para 3.35 and SCLP para 3.34). Neither of these policies establishes any policy requirement for relocation of the CWWTP nor indicates that there is any need for relocation in order to achieve the aims of the policy. The adopted development plan therefore provides no formal support for the relocation of the CWWTP. In relation to emerging policy, this is at an early stage of the plan process and should therefore be given very limited weight in the consideration of this Application pursuant to para 48 of NPPF. NECAAP, which is being developed pursuant to CLP Policy 15 and SCLP Policy SS/4, has not yet been submitted for examination and is paused pending the outcome of this Application. The Greater Cambridge Local Plan (GCLP), an emerging joint plan being prepared by Cambridge City Council and South Cambridgeshire District Council, is at an even earlier stage of proceedings, with a further regulation</p>	<p>Regarding the points on development plan policy support for the relocation, the Applicant refers to paragraphs 2.3.14 - 2.3.36 of the Planning Statement (App Doc Ref 7.15) [AS-126].</p> <p>In summary, 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". Weight should be afforded to the NECAAP (particularly in the context of 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 development potential of the area identified in it, consistent with the advice at NPPF paragraph 48.</p> <p>Some 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</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>18 version of the Plan anticipated to be published later in 2023. Both NECAAP and GCLP have been described by the LPAs as being 'contingent' and 'predicated' on the relocation of the CWWTP taking place. They have been prepared on the basis and assumption that the relocation takes place, but relocation is not a policy requirement of either emerging plan. This is also reflected in the consultation response submitted on behalf of the LPAs to the EIA scoping consultation request issued by the Planning Inspectorate on 20 October 2021 (Planning Inspectorate Scoping Report Opinion). The LPAs emphasise, pages 6 and 7, that the relocation of the CWWTP is not a requirement of NECAAP because 'we are not requiring the relocation, but the NECAAP and the emerging joint Local Plan have identified the opportunity that the relocation creates for homes and jobs in the North-East Cambridge Area'. This is reflected in the Planning Statement for the Application, which acknowledges that the Draft NECAAP does not contain any specific policy advocating and supporting the relocation of the existing WWTP off-site in order to achieve the spatial strategy (para 2.3.15). The planning process for NECAAP and GCLP will not proceed to regulation 19 stage before the determination of the DCO, indicating that the LPAs accept that if the DCO is not approved it will be necessary to reconsider and amend the plans (Planning Statement para 2.3.28). The Planning Statement relies on a Development Strategy Update report (Ref 2) produced as part of the GCLP and approved by the LPAs in early 2023. The Planning Statement places a great deal of weight on</p>	<p>(Regulation18) consultation. Substantial weight should be given to the conclusions of the Strategy Update.</p> <p>This area was discussed at length in ISH2 and the Applicant also refers SHH to the evidence provided by the relevant Local Authorities (see App Doc Refs EV-005c and EV-005d).</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>the Applicant's interpretation of that Development Strategy Update as supporting the case for relocation (see, for example, para 2.3.33). What that strategy makes very clear is that there is still a great deal of uncertainty regarding the spatial strategy of the emerging Local Plan and the amount of development that it will be possible to deliver (in particular, regarding water supply, housing delivery and other infrastructure and environmental constraints). However, the emerging plans still do not set out any requirement or direct policy support for the relocation of the CWWTP. It is clear from the accompanying Sustainability Appraisal Addendum (Ref 3) at para 2.30 that the impacts of relocation of the WWTP have not been taken into account in the sustainability assessment of the redevelopment of North-East Cambridge, as the relocation has been treated as a separate and prior process (Tables 3 and 4 and para 1.42). The report confirms that the later stages of plan-making for GCLP and NECAAP are dependent on the outcome of this Application (para 4.5). As an interim update, the Development Strategy Update (Ref 3), the Sustainability Appraisal Addendum and supporting reports have not been subject to consultation and it is incorrect to describe the DSU as a 'regulation 18 preferred options' report (Planning Statement para 2.3.33). Those documents also indicate that there is a significant degree of uncertainty regarding the amount of employment and housing that can be planned for in the GCLP due to possible constraints of water supply and housing delivery (Development Strategy Update Report paras 3.25 and 3.29; Sustainability Appraisal</p>	

Reference	Relevant Representation Comment	Applicant's Response
	<p>Addendum paras.1.3 and 1.20). While the report seeks in principle confirmation of North East Cambridge as a strategic site, it confirms at para 4.3.1 that 'proposals are contingent on the separate Development Consent Order' sought for relocation and that 'the Local Plan itself does not require the relocation of the WWTP to take place'. There is also a marked contrast between the approach to the impact on the Green Belt of another proposed strategic site, at Cambridge Biomedical Campus, where the report cautiously recommends further exploration of Green Belt release on the basis of the national and international significance of the biomedical cluster (para 4.3.3), while there is no mention at all of the release of Green Belt land required to facilitate the development of North East Cambridge due to the relocation of the CWWTP.</p>	
4.4	<p>Weaknesses in the Applicant's Case on Housing and Employment. With regard to the need for housing and employment, SHH will make further representations seeking to establish that there is substantial uncertainty about whether there is the 'need for land occupied by existing facilities' and that the need is capable of being satisfied through consolidation of the CWWTP on the existing site with appropriate mixed-use development being promoted in the NECAAP area. At present the need for housing and employment is asserted rather than demonstrated in the application documents and SHH wishes to have a fair opportunity to test such evidence as is relied upon by the Applicant. It would not be logical to</p>	<p>The Applicant refers to Figure 45 of NECAAP (page 271, Proposed Submission NECAAP 2021), which illustrates that if no housing were to be delivered on the Anglian Water/ Core Site, this would result in a direct loss of the housing allocated on the existing WWTP site, ie. 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</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>place material weight on mere assertion, particularly where the need for housing and employment (and the need to release the current WWTP site) is a matter which would ordinarily be addressed via the local plan process, which is the proper forum intended to consider such an important issue as the release of a large area of Green Belt for development. SHH will make further representations on elements of the Applicant's need case, as set out below, and will make additional representations on housing and employment need in the Greater Cambridge area, if other points are raised during the Examination: (i) The LPAs are now able to adjust local housing targets downwards to reflect local circumstances, in line with the Government's intentions in the Levelling Up and Regeneration Bill. (ii) The 2022 based 'objectively assessed need' (OAN) for housing in Greater Cambridge, set out in the DSU, and the assessment used the GCLP First Proposals (FP), are both 'employment growth driven' and present an OAN that is well in excess of 'demographic need'. Local employment projections are very unreliable as the basis for strategic planning for housing provision. The assessments also use a 1:1 matching ratio of housing to future jobs to be met within the plan area. The Cambridge Travel to Work Area (TTWA) extends far beyond the City and South Cambridgeshire, and housing in the local plan area is far less affordable than in that wider TTWA. These and other assumptions exaggerate the 'housing requirement' in the GCLP area and should be reconsidered before this is confirmed. (iii) There is a sustainable planning, housing,</p>	<p>Industrial Estate (100 homes) and Chesterton Sidings (1,250 homes) which are within the 400m buffer zone would also therefore not be delivered. This would total 3,675 homes not being delivered in the Plan period.</p> <p>The Greater Cambridge Local Plan First Proposals set 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.</p> <p>The 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:</p> <p><i>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</i></p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>and economic growth case for actively dispersing part of any housing and employment requirement predicted to arise in the Greater Cambridge local plan area to towns to the north, west and east, in the rest of Cambridgeshire and Peterborough and potentially further afield. These opportunities have not yet been explored with the relevant local authorities. (iv) The adopted local plans and the GCLP FP together have already identified housing sites and locations with an overall capacity well in excess of the objectively assessed need (OAN) of 44,000, plus a 10% buffer, for the period 2020 to 2041, as set out in the GCLP FP Development Strategy Topic Paper Housing Trajectory Nov 2021. Over and above that provision, there are other sites, for example west of Cambourne and the Bio-Medical Campus, which are identified in the FP, but without quantified housing capacities. In the case of the Cambridge Airport allocated site, it is likely that, in practice, given the extent of the site and the published intentions of the owners, this new neighbourhood can accommodate far more than the nominal amount of housing, 7,000 dwellings, assumed in the FP. (v) Some combination of capacity on all of these strategic sites could be brought forward to provide sustainable alternatives to the presently proposed housing provision on NECAAP, both within the local plan period to 2041 and beyond. This is likely to be the case, even if the higher OAN of 51,000 households for the period 2020 to 2041 presented in the 2022 based projections and reported in the DSU, is found to be sustainable and deliverable. The Applicant already</p>	<p><i>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.</i></p> <p><i>Consolidation 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.</i></p> <p>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:</p> <ul style="list-style-type: none"> • 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.

Reference	Relevant Representation Comment	Applicant's Response
	<p>recognises that some development could come forward on the existing CWWTP site with the existing works still in situ. It notes that areas of the CWWTP which are currently non-operational could come forward for redevelopment in advance of the decommissioning of the CWWTP (AW 5.2.2 ES Chapter 2: Project Description para 1.7.3). The LPAs already assume in their housing trajectories that 650 dwellings or more could come forward on sites across NECAAP in advance of any relocation of the CWWTP. The Greater Cambridge 5 Year Housing Land Supply Study 2023 (p39) makes it clear that the present rates of housing development are running substantially ahead of the requirements set out in the adopted Local Plans and also notes the ability of sites already allocated in those plans to meet that level of demand going forward to 2031 and beyond. The argument that NECAAP is the most sustainable strategic location in Greater Cambridge for housing development (see Planning Statement at para 2.1.3) needs very critical scrutiny, both in absolute terms and in comparison with alternative locations already set out in the emerging plan. Other strategic locations, such as Cambridge Airport, are or will be provided with high quality local public transport as well as a wide range of employment provision in close proximity or otherwise accessible via public transport. The particularly high overall density of housing provision proposed in NECAAP is dependent not just on the relocation of the WWTP to a Green Belt site, but also other off-site provision including a park and ride site in the Green Belt as well as other off-site</p>	<p>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.</p> <p>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.</p> <p>In the absence of the relocation of the WWTP, the existing Cambridge WWTP and the Safeguarding Area (or odour zone) around it would continue to prevent any residential development and restricts employment land-use to general industrial and office on the fringes. This would prevent 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.</p> <p>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 existing Cambridge 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”.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>open space, recreation, and biodiversity provision. The high sustainability rating claimed for NECAAP is based on assessed transport/carbon benefits derived from questionable assumptions about residents' travel and other behaviour in terms of destinations, frequency, and modes. Limits to the NECAAP trip generation budget, derived from the primary road network capacity, will adversely affect the ability of the site to deliver market appropriate housing. There are numerous businesses, mainly light industrial, transport and distribution uses located within the NECAAP area, which will, if displaced, require relocation to other sites within or close to Cambridge. There are few, if any, relocation sites likely to be available in Cambridge for business uses which cannot afford high rents. There are many aspects of the NECAAP proposals which have attracted substantial and well-informed opposition from a range of stakeholders, including public bodies and it will be scrutinised critically before and at examination. NECAAP is also a complex multi-owner brownfield site in contrast to other strategic locations. Full delivery of NECAAP is dependent either on the agreement of a considerable number of landowners, beyond Anglian Water and the City Council, or the successful use of compulsory acquisition powers. Major sites, for example, the main or 'gateway' site at and to the North of Cambridge North railway station have already been subject to planning applications for mixed-use employment-led development by their owners. A major application on this site is being pursued through an ongoing appeal by Brookgate Ltd</p>	<p>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.</p> <p>Therefore, with the option of 'doing nothing', the total housing – 3,900 dwellings allocated to the NEC area within the plan period would not be delivered and result in a total loss of approximately 8,000 dwellings allocated to the NEC area beyond the plan period. It is acknowledged above that there might be smaller opportunities that could come forward as shown in our answer to 2.32(c).</p> <p>South Cambridgeshire District Council's relevant representations (paragraph 25 – RR-004) recognise that "<i>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</i>". 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</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>(APP/W0530/W/23/3315611). There are also other proposals from landowners within NECAAP looking to meet the urgent demand for quality business and research employment floorspace, rather than housing. For example, an application for demolition and erection of new research buildings (23/01487/FUL) at the St. John's Innovation Park is awaiting decision. In line with the Development Strategy Update, the LPAs are reviewing both the quantity, location and delivery of new housing and employment provision to be made in the GCLP, including the sustainability of all the strategic sites, in the light of the numerous constraints, not least those of water supply. Until this is completed, and the findings scrutinised, it would be premature to conclude that there is the claimed need for the WWTP relocation to release the whole of the core site for housing. SHH submits that all the above matters reduce the weight that should be given to the 'need for the site of the existing facilities' as a justification for the relocation of the CWWTP.</p>	<p>emerging GCLP (i.e. to promote sustainability through provision of sustainable travel), the Councils acknowledge that <i>"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"</i>. As suggested above, 3,900 homes would need to be delivered at less sustainable locations within the local plan period.</p>
5.1	<p>SHH will demonstrate that the Applicant has adopted an unlawfully narrow definition of the PD and has failed to carry out a lawful assessment of the reasonable alternatives to the PD.</p>	<p>The Applicant has responded to this point above, response to 4.4.</p> <p>The Applicant also refers to the description of the Proposed Development in Chapter 2 of the ES, Project Description (App Doc Ref 5.2.2) [AP-034], section 1.4 and figure 1.1 which clearly set out the scope of the draft DCO and how the future demolition and redevelopment of the existing site is structured.</p>

Reference	Relevant Representation Comment	Applicant's Response
5.2	<p>Environmental Impact Assessment (EIA)</p> <p>The definition of the PD – the project – is crucial for EIA development as it is the effects of the project which must be assessed in the ES (R (Ashchurch Rural Parish Council v Tewkesbury Borough Council [2023] EWCA Civ 101 at para 73). A decision-maker must apply its mind to the question of what the project is for the purposes of EIA, including whether the PD applied for is part of a wider scheme or larger development. The fact that there may not yet be firm development proposals for that wider scheme is irrelevant where the PD clearly forms an integral part of an envisaged wider future development, without which the original development would never take place. Similarly, any difficulty in assessing the wider proposals due to a lack of information is not a justification for excluding them from the scope of the ES, if an integral part of the project (Ashchurch at paras 80-90). The Applicant has chosen to exclude the demolition, site clearance and remediation of the existing works from the scope of the project (AW 5.2.2 ES Chapter 2 para 1.4.7). SHH disagrees with this approach, because these are directly consequential works which are necessary to deliver the purpose of the relocation project, which is the release of a clean site for housing development. It is also the polluting landowner's responsibility to demolish and remediate the site or to secure its remediation before disposal to avoid any residual</p>	<p>Chapter 3 of the ES (App Doc Ref 5.2.3) [APP-019] sets out the site selection and assessment of alternatives.</p> <p>The applicant has set out the decommissioning activities which form part of the authorised development for which development consent is sought at section 6 Decommissioning, in Chapter 2 of the ES and in particular at table 6-1. These activities are then expanded upon in the Outline decommissioning plan (Appendix 2) (App Doc Ref 5.4.2.3) [AS-051]. Alignment with these activities is secured via requirements 9(1)(b)(xiv) and 18 of Schedule 2 to the dDCO (App Doc Ref 2.1) [AS-139]. Total demolition, remediation of the existing site and its redevelopment for housing fall outside of these activities and therefore do not form part of the project for which development consent is sought and would require separate consents at a later date. The applicant does not consider that it is reasonably foreseeable that any demolition and/or remediation etc. would occur otherwise than as part of a consent for the comprehensive redevelopment of the existing site. It will not be undertaken by the Applicant.</p> <p>In accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 Schedule 4 Para 5 an ES must include a description of the likely significant effects of the development on the environment resulting from, inter alia: (e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>liabilities. With minor exceptions, there is no reasonably beneficial use that can be contemplated for the existing buildings and structures on the site. The Applicant relies on the fact that consent for the housing redevelopment of the CWWTP site will be sought by a different applicant as a separate planning permission at a later date to exclude the redevelopment of the existing works site from the scope of EIA of the project. On the basis of Ashchurch, this is not a sufficient justification for excluding it from the scope of the project, as the relocation is a 'direct consequence' and intended to allow that housing development to be undertaken. The adverse environmental effects of decommissioning the existing works, which include carbon emissions or transport effects, must be taken into account in reaching a decision whether or not to grant the DCO. On the same basis, demolition should have been included as part of the scope for the assessment of all alternatives to the PD that would require whole or partial demolition, site clearance and remediation. Considering NECAAP merely as another scheme in a 'cumulative' assessment, is also, in this instance, not sufficient.</p>	<p>environmental importance likely to be affected or the use of natural resources;</p> <p>PINS Advice Note 17 para 1.4 explains PINS' view of the definition of "other existing and/or approved projects" and then sets out a four staged approach to the assessment. The applicant agrees that the redevelopment of the existing site falls within Tier 3 as described in Table 2 of AN17 and accordingly indicated at para 1.5.3 of Chapter 2 of the ES (in the original document that was submitted) that it would consider those works as part of the cumulative impact assessment chapter of the ES. This is indicated again in Chapter 2 Project Description of the ES at paragraph 2.2.5 (App Doc Ref 5.2.2) [AS-034]. The approach taken in Chapter 22, Cumulative Impact Assessment (App Doc Ref 5.2.22) [AS-044] (see figure 2.1) aligns with the four-stage approach in AN17.</p> <p>Table 26 in Chapter 22 (App Doc Ref 5.2.22) [AS-044] sets out the long list of developments that were considered for CEA and includes at references 18, 19 and 21 the redevelopment proposals for the existing site in the emerging North East Cambridge AAP (18), the redevelopment proposals for the site in the emerging Greater Cambridge Local Plan (19) and the demolition of the existing works (21) with para 2.7.6 outlining related assumptions and paras 3.1.3 and 3.1.4 expressly confirming that these activities have been considered as part of the CEA. Sections 3.7 and 3.9 then give more detail on those activities and the potential impacts. Para 4.1.30 then explains that there will be no likely cumulative effects during the</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>construction phase of the proposed development due to the absence of temporal overlap between its construction and any demolition/redevelopment of the existing site. Finally, table 44 considers the cumulative effects that may occur during the operational phase of the proposed development. It is clear that the redevelopment proposals in the NECAAP and the demolition of the existing works are projects that have been considered as part of that cumulative assessment, albeit that they are at a very early stage. In undertaking that assessment, the applicant noted the advice in para 3.4.3 on AN17 that: For 'other existing development and/or approved development' falling into Tier 3, the applicant should aim to undertake an assessment where possible, although this may be qualitative and at a very high level. It is therefore entirely incorrect to state that these elements have not been considered. For clarity, the Applicant has added a new Work No. 40 to Schedule 1 of the DCO (App Doc Ref 2.1) [AS-139] and Works Plans (App Doc Ref 4.3) [AS-150] which specifically cover works involved in the decommissioning of the existing Cambridge WWTP which are covered by the dDCO (App Doc Ref 5.2.2) [AS-034].</p> <p>Regarding the relevance of the Court of Appeal's recent judgement in R. (oao Ashchurch Rural Parish Council) v Tewkesbury Borough Council [2023] EWCA Civ 101., the Court of Appeal in Ashchurch were 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</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>question was whether a bridge which served no other purpose than to provide access to a future residential development had legitimately been considered at the screening stage 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 LPA did not 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 be clearly be distinguished from the Proposed Development 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, and (c) the applicant has duly provided an ES and considered the future development as part of its Cumulative Impact Assessment (App Doc Ref 5.2.22) [AS-044].</p> <p>This issue was discussed at Issue Specific Hearing 2 where the applicant explained that <i>Ashchurch</i> is an example of a very deliberate putting out of mind of other matters at the EIA screening stage. This is not the case with the current application, as demonstrated by the cumulative chapter of the</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>ES Chapter 22 Cumulative Impact Assessment (App Doc Ref 5.2.22) [AS-044].</p> <p>Further, it is the applicant's position, as also stated at Issue Specific Hearing 2, that the level of assessment which has been undertaken accords with and is informed by the Planning Inspectorate Advice Note Number 17 because these elements fall into tier three. Within that note, the advice given is that in those circumstances, being tier three types of activity, only very high level or qualitative assessment is likely to be appropriate.</p> <p>'Tier 3' is copied below for ease of reference:</p> <ul style="list-style-type: none"> • <i>projects on the Planning Inspectorate's Programme of Projects where a scoping report has not been submitted.</i> • <i>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;</i> • <i>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.</i>
5.3	<p>Legal Framework for Consideration of Alternatives</p> <p>As well as the statutory requirement to consider alternatives in Reg 14(2)(d) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and</p>	<p>As is clear from Section 1.2 of Chapter 3 of the ES (Site Selection and Alternatives, Application Document Reference 5.2.3) [AS-018] the 'Do Nothing' and the provision of the upgrades at the existing WWTP options were scenarios taken into account as part of the local plan process establishing the</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>the policy guidance in paras.3.4.2 and 3.4.3 of NPSWW, the DCO process must also comply with the common law on the consideration of alternatives in the planning context (R (Save Stonehenge WHS Ltd) v Secretary of State for Transport [2021] EWHC 2161 (Admin), [2022] PTSR 74 at para 259). Where there are clear planning objections to a development on a particular site 'it may well be relevant and indeed necessary' to consider whether there is another more appropriate site, and this will be primarily so 'where the development is bound to have significant adverse effects and where the major argument advanced in support of the application is that the need for the development outweighs the planning disadvantages inherent in it' (Stonehenge at para 269). The requirement to consider alternatives arises in 'exceptional circumstances' and does not extend to schemes which are 'vague or inchoate, or which have no real possibility of coming about' (Stonehenge at para 270). However, this does not mean that in the absence of detailed and worked up alternatives, the possibility of the development taking place on an alternative site should be discounted, nor that it is necessary for SHH to point to a specific alternative scheme in order for its arguments on alternatives to be considered (London Historic Parks and Gardens Trust v Minister of State for Housing [2022] EWHC 829 (Admin)). Stonehenge also establishes that cost is not a reason to exclude alternative, less harmful options from consideration by the decision maker (Stonehenge at paras 247, 262 and 277).</p>	<p>need for, and scope of, the Project. The 'Do Nothing' and the provision of the upgrades at the existing WWTP options were not alternatives studied by the Applicant because they would not deliver the Project and the rationale for it.</p> <p>There is no requirement to provide a comparative environmental assessment. Instead, the alternatives that are considered in the Environmental Statement relate to the choice of site, technologies and design options. The rationale for the Project is addressed at Section 2 of the Planning Statement (Application Document Reference 7.5) and is supported by a Cambridge Waste Water Treatment Plant: Strategic Whole-Life Carbon Assessment, January 2023 (App Doc Ref 7.5.2) [APP-206].</p> <p>The Applicant refers further to its responses to ExA Q1 2.27-2.29 in this regard.</p>

Reference	Relevant Representation Comment	Applicant's Response
5.4	<p>Failure to Assess the Feasibility of Retention of the Works on Site</p> <p>In SHH's view, proper consideration must be given by the Applicant to the retention and consolidation of the CWWTP on its existing site. That is an obviously material consideration which must, as a matter of law, be taken into account as part of the determination of the DCO. The ES demonstrates that the PD will have significant adverse residual effects on the environment. The only justification for those effects is the asserted need for relocation. A logical prior question is therefore whether relocation is necessary, or whether the need could be satisfied through retention.</p> <p>Further reasons why it is necessary to consider alternatives include the fact that the relocation of the CWWTP will involve inappropriate development on a large area of land in the Green Belt (an asset of national importance), the fact that such consolidation is envisaged by the adopted Local Plans (therefore it is neither vague nor inchoate) and the fact that the claimed need for the development is not an operational or infrastructure-based need. As will be demonstrated, there has been no real consideration of the retention and consolidation of the CWWTP as an alternative to relocation. Retention and consolidation of the CWWTP on part of the existing site is a reasonable and obviously material alternative that should have been assessed. It was not: the discussion in ES Chapter 3: Site</p>	<p>The Applicant has responded to this point above, response to 4.4.</p> <p>The Greater Cambridge Shared Planning Service has also published a summary chronology of evidence that has assessed the feasibility of redeveloping the Cambridge Waste Water Treatment Plant (WWTP) either on the current site (through consolidation) or elsewhere. That report concluded that:</p> <p>"The chronology shows a long-held ambition by both local authorities to bring forward the land on which the current Waste Water Treatment Plant (WWTP) sits, and surrounding parcels of land, for comprehensive mixed-use development, recognising that it is a brownfield site within the urban area of Cambridge and close to the Cambridge North Station."</p> <p>Various studies, in support of proposed masterplans or development plan allocations, have examined the viability and deliverability of redevelopment of the existing Cambridge WWTP area, either through consolidation of a new WWTP onto a portion of the existing site or relocating the existing Cambridge WWTP off-site. The studies conclude that consolidation on-site is not feasible and that neither option is viable in the absence of significant external grant due to the relocation costs.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Selection and Alternatives (AW 5.2.3) at paras 1.2.1 to 1.2.6, is wholly inadequate. As explained above, Local Plan policies for the North-East Cambridge area promote high-quality mixed-use development on the site while retaining the CWWTP on site. They also commit to carrying out feasibility studies to assess whether it would be possible to provide new treatment facilities on the current site as part of the initial preparation of the AAP.</p> <p>As recognised by the Applicant at para 2.3.13 of the Planning Statement, at the issues and options stage of the plan process for NECAAP in 2014, four options for the redevelopment of the wider CWWTP site were considered, of which option (iv), relocating the CWWTP offsite, was rejected as a non-starter due to the cost and challenge of relocating the CWWTP. Paras 2.3.12 to 20 of the Planning Statement confirm that no further testing of the feasibility of retaining the CWWTP on site has been undertaken by the LPAs or by the Applicant in the preparation of the DCO application. An application to the Government's Housing Infrastructure Fund was made in 2018 by Cambridge City Council, SCDC and the Cambridgeshire and Peterborough Combined Authority (CAPCA). This sought funding on the sole basis of a full relocation package and did not present any costed alternatives, such as consolidation and release of parts of the existing works site for development, which as the local plan policies make clear, would have permitted a mixed-use development including housing on land released from or adjoining the existing works. The HIF grant</p>	<p>At the time when the current 2018 Local Plan policies were prepared and examined, there was no evidence that redevelopment of the WWTP was viable. However, the subsequent securing of HIF has now made relocation a viable proposition. The draft AAP is predicated on the existing Cambridge WWTP being relocated and available for redevelopment. In terms of the feasibility of relocation of the existing Cambridge WWTP, that process is being tested through a separate Development Consent Order, the outcome of which will inform the proposals submitted in the joint North East Cambridge Area Action Plan.</p> <p>Further detail regarding these points is provided in The NECAAP Sustainability Appraisal November 2021. In the absence of the relocation of the existing Cambridge 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 Cambridge 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.</p> <p>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 existing</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>was approved in March 2019. The amount of HIF grant approved was sufficient for a long tunnel option that could have allowed a relocation site to be adopted that lies beyond the Green Belt. Exclusion of sites beyond the Green Belt, during selection, on the basis that these were undeliverable within the budget of the HIF grant, cannot justify those sites being excluded. The draft Regulation 18 NECAAP which was 'predicated on the relocation' (page 21) was published in July 2020, but without any feasibility studies for retention or relocation forming part of its evidence base. The Planning Statement (AW 7.5), para 2.3.13 and 2.3.19, refers to an 'NEC Chronology of Feasibility Investigations' prepared by the LPAs, which is undated (Ref 4). This appeared in the evidence base for NECAAP online in July 2021 in response to enquiries about the absence of the promised feasibility studies made by SHH.</p> <p>This Chronology does not refer to any proper studies of the feasibility of retaining and improving the works on site which have been undertaken since the commitment was given in the adopted local plans. The Chronology on page 12 refers to some consideration said to have been given to such matters as part of the HIF application preparation. The HIF Business Case, page 29, (in a redacted copy secured under FoI by SHH) also refers to this, but those studies were not included in the Business Case and have never been published. No information has been provided by the Applicant regarding the scope, assumptions, findings or</p>	<p>Cambridge 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".</p> <p>The NECAAP Sustainability Appraisal 'Area Action Plan and Reasonable Alternatives' section 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.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>reliability of any such studies. The Planning Statement also refers to Sustainability Appraisals both for the regulation 19 NECAAP (para 2.3.17) presented to Committees between November 2021 and January 2022 and the GCLP First Proposals (para 2.3.25). Sustainability appraisals are not intended to be primary assessments of the merits of rejected development options, and nothing said in these documents is an independent evidenced appraisal of the feasibility or viability of retaining the works on site.</p>	
<p>5.5</p>	<p>Flawed Assessment of the Off-site Relocation Alternatives</p> <p>SHH will demonstrate that the assessment of the alternative locations for the proposed relocation that was undertaken, is flawed in the following ways:</p>	
	<p>(i) Failure to comply with Green Belt policy: By not using Green Belt designation in the initial site selection (AW 5.4.3.2; 2.1 & 2.4.7), AW has not complied with the common law or the NPSWW requirement that alternatives are assessed adequately (NPSWW 2012 2.4, 4.8.). AW has submitted no new work on the feasibility of remaining on the current site or of alternative sites since the original site selection process in 2020. The plant is currently in an industrial part of the urban area and moving to open agricultural countryside in Green Belt contravenes policy (CLP 2018; SCLP 2018; NPPF 2021 Ch 13).</p>	<p>The Applicant refers to Chapter 3 of the Environmental Statement which outlines the main reasons why non-Green Belt options were discounted (primarily carbon and cost). See particularly paragraphs 2.2.18 – 2.2.26. Further information was provided in the site selection reports published during consultation. The approach taken in the Site Selection exercise to the consideration of sites inside the Green Belt is first described at Section 2.4 of the Stage 1 Initial Site Selection Report (App Doc Ref 5.4.3.2) [APP-075] and the reasons why Green Belt was not used as a baseline constraint at this stage of site selection is set out at paragraph 2.4.6.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Inappropriate development within the Green Belt does not contravene policy if it can be demonstrated that there are very special circumstances. This was recognised in the Site Selection exercise and is addressed at Section 6 of the Planning Statement (App Doc Ref 7.5) [AS-166].</p>
	<p>(ii) The Applicant claimed that applying Green Belt designation as a constraint at Stage 1 site selection would remove a large proportion of the study area for consideration. The value and importance of each site in Green Belt terms should have been considered. From 99 individual unconstrained areas, 14 potential sites were identified (AW ES 5.2.3; para 2.2.8, table 2.3). The multiple criteria used were given equal weight in selection using crude fixed buffer zones around sensitive receptors. Using 400 m from all dwellings was too restrictive. Those sites with a small number of dwellings within a 200m to 400 m zone should have been included. Plans for suitable mitigation or compensation for a small number of affected residents could have allowed these locations to be taken to the next stage of selection. The sensitivity analysis of the constraints and buffers employed at Stage 1 to identify additional site areas was not included in Stage 2; this would have identified more potential sites, both within and outside the Green Belt. Weightings applied to the analysis are not transparent. Seven sites were removed from further assessment, including three which were outside the Green Belt. Their rejection was reported as due to risk, which was not defined, but appeared to be financial risk arising from the length of tunnels. The introduction of affordability</p>	<p>The Applicant did consider the value and importance of each site in Green Belt terms as part of the site selection stud</p> <p>SHH appear to have misunderstood the "filtering" approach adopted in the site selection process, whereby areas or prospective sites were excluded at each stage from subsequent consideration. This strategic approach is common for large infrastructure projects where it would not be practicable for detailed environmental analysis to take place across the whole study area; some form of preliminary screening is necessary with discarded options not revisited unless a change in material circumstances require a back check.</p> <p>The approach taken in the Site Selection exercise to the consideration of sites inside the Green Belt is first described at Section 2.4 of the Stage 1 Initial Site Selection Report (App Doc Ref 5.4.3.2) [APP-075] and the reasons why Green Belt was not used as a baseline constraint at this stage of site selection is set out at paragraph 2.4.6.</p> <p>In the Stage 2 Site Selection Report - Coarse Screening, Green Belt is considered as an assessment criterion in section 12.1 (App Doc Ref 5.4.3.3) [AS-076]. It is also addressed in the RAG Assessment at B.13 in the Stage 3 Site Selection Report - Fine</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>criterion at Coarse Screening appeared to be the main justification for the elimination of all non-Green Belt sites. Subsequent site selection stages reduced possible sites to three, all to the north of Cambridge, at Milton, Impington, and Honey Hill between Fen Ditton and Horningsea, despite all being in Green Belt.</p>	<p>Screening (App Doc Ref 5.4.3.4) [AS-077] Stage 4 Final Site Selection (App Doc Ref 5.4.3.5) [AS-078] included the preparation of a separate Green Belt Assessment report which informed the planning assessment exercise. This was the subject of public consultation.</p> <p>The selection and appropriateness of the 400m around residential properties applied at Stage 1 of the site selection exercise is discussed further in response to the ExA's first questions 2.29.</p> <p>Chapter 3 of the Environmental Statement (App Doc Ref 5.2.3) [AS-018] outlines the main reasons why non-Green Belt options were discounted. See particularly paragraphs 2.2.18 - 2.2.26.</p> <p>The Applicant has been transparent, publishing reports setting out the site selection methodology, process and results.</p>
	<p>(iii) Lack of transparency: An unexplained form of weighting of impacts was also introduced at final site selection stage (in the Stage 4 Report AW 5.4.3.5), which prioritised Site 3 selection over Site 2. Site 2 appeared to be discounted because of proposals by Trinity College to develop the area as an extension to Cambridge Science Park. This was rejected and did not appear in the GCLP First Proposals in Autumn 2021. This requires reconsideration of that aspect of the site selection. As now reported in the ES Chapter 3 (AW 5.2.3), in Sections 3.1 and 3.3, there were also further assessments of alternatives undertaken by the Applicant before the Phase 2 consultation, but not reported or</p>	<p>The weighting of the selection criteria is clearly explained in the Stage 4 report (App Doc Ref 5.4.3.5) [APP-078], where the reasons for each of the criteria being selected and their relative importance are described – paragraph 6.1.2 (page 68) explains the approach and the comparison of the relationship between the criteria is clearly described in figure 6.14 (page 88) and the subsequent text at paragraphs 6.13.2 – 6.13.8.</p> <p>The issue of the science park proposals is addressed in greater detail in the Applicant's response to ExA's question 2.28. It should be noted that Site 2 was least preferred for a variety of reasons (as explained in (App Doc Ref 5.4.3.5) [APP-078]) not</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>consulted upon. The choice of location within the site, in particular, is of great importance and should have been subject to a rigorous option selection exercise and the results presented as part of consultation with detailed justification.</p>	<p>just competing land use; see figure 6.14 (page 88) and the subsequent text at paragraphs 6.13.2 – 6.13.8.</p> <p>The reference to paragraphs 3.1 and 3.3 of the environmental statement alternatives chapter [AS-018] is to site refinement. The selected location of the works was presented at CON2 (AP-181 – see pages 10-11 and 14-15) – only limited comments on the specifics of the selected location within site were received from stakeholders, primarily in respect of potential odour impacts south of the A14. The Applicant disagrees that technical site refinement decisions should have been consulted on and the Interested Party would, in any event, have rejected any location within the Site 3 boundary as it is opposed to the principle of the development at this location. The Applicant's description of the alternatives considered in selecting a preferred location in (App Doc Ref 5.2.3) [AS-018] is clear and accords with the EIA Regulations.</p>
	<p>(iv) Other options for providing for Waterbeach New Town were not fully considered: AW's original proposal was for a new Waterbeach WWTP to replace the existing Waterbeach works to provide for the Waterbeach catchment area, including the New Town. This was discounted following advice from Cambridgeshire County Council and the Environment Agency that the site proposed was in Flood Zone 2 and should not be considered further. AW did not then explore feasible options for a local replacement works, applying suitable flood mitigation measures, but decided to adopt much longer distance</p>	<p>The Applicant notes the comments. The Applicant was part of the Waterbeach Watercycle Study in 2012 when the Waterbeach New Town was first promoted. The Applicant submitted to South Cambridgeshire District Council two options for the drainage strategy for the Waterbeach New Town Development namely a new relocated site to the east of the existing Waterbeach WRC or a pipeline for treatment to the existing Cambridge WWTP. This is reflected in the Statement of Requirement at (App Doc Ref 7.2) [AP-201].</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>pumping solutions, taking effluent from Waterbeach upstream to the CWWTP. This now involves a separate pumping main for Phase 1 of the new town direct to the existing CWWTP, with the two stages of the pipeline included in the PD replacing the existing Waterbeach WWTP and handling all other further development at Waterbeach. Given the distances involved and the capacity required for Waterbeach, a separate local works could have been provided cost effectively and in accordance with the 'proximity principle'.</p>	<p>Alternative sites for a new works were not further explored after the original application did not have the support of The Environment Agency or Cambridgeshire County Council given that there were no further available options which were free of the constraints of 400 m proximity to sensitive residential receptors or of being in the flood plain. As a viable alternative it is normal and often more cost effective to pump waste water to larger treatment works where the cost of treatment is lower hence its inclusion in the original drainage strategy.</p>
5.6	<p>Practicality of Consolidating the Works on Site to Allow Development.</p> <p>It is SHH's position that retention and consolidation of the CWWTP on site with further development on and adjacent to the CWWTP site is feasible and is an alternative that should have been explored by the LPAs and the Applicant. The existing Cambridge WWTP site is around 40 hectares (AW 7.2 para 18) whereas the land requirement for a new waste water treatment plant with sufficient capacity (AW 7.2 para 28), using similar technology to the existing WWTP, is stated by Anglian Water to be in the region of 22 ha (Initial Options Appraisal 5.4.3.1, para 1.1.6) and this site requirement was used for scheme development. The submitted application, which includes plant for a Phase 2 capacity of at least 50% over the existing, is proposed on an operational footprint of around 22 ha. The Applicant and the other regional water companies have extensive experience of upgrading and expanding WWTPs on their</p>	<p>The Applicant has already responded to these points. Please see above responses to points 4.4 and 5.4.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>existing sites. The creation of a consolidated works, which meets the necessary high environmental standards on part of the existing site, which could allow the odour safeguarding area to be reduced or eliminated, is entirely technically feasible. That scheme should be laid out with space for phased future expansion. The existing works is close to the well screened northern boundary of the NECAAP area and any consolidation would allow a significant southern part of the site to be released for other uses. SHH is aware that there are a number of urban WWTPs on the scale of the Cambridge works that have been retained, redeveloped and extended to meet high environmental standards, compatible with business uses and, crucially, to allow residential uses and development in close proximity to the works. Examples include Riverside (Rainham), Mogden (Isleworth), Beckton, Daveyhulme and Deephams. The Deephams WWTP has housing no more than 50m from the site and the Mogden works is surrounded by residential development. Consolidation would allow for high quality business and research uses to be developed on land released from the works and on substantial areas of vacant or low quality industrial and storage sites to the south of the works, including the land to the north of Cambridge North station. A large single site can potentially be assembled, which may in total be 50 hectares. There would be scope for substantial amounts of housing, retail, and community facilities, provided that appropriate high environmental standards are designed into the consolidated works. A reliable feasibility study for</p>	

Reference	Relevant Representation Comment	Applicant's Response
	<p>examining options for retention and consolidation should already have been done prior to the publication of the draft NECAAP. Quantifying the extent of the development opportunities and confirming their viability needs a proper master planning, design, and development appraisal study. It is very likely, given the high gross development values being achieved for both market housing and high-quality life sciences and other research floorspace in Cambridge, that a consolidation and development scheme, which is sustainable and delivers an appropriate solution in planning terms, will be viable, without substantial or any grant aid. Securing delivery would require proper policy support for the consolidation and redevelopment and may require similar land assembly arrangements to those being proposed for NECAAP.</p>	
5.7	<p>The Applicant has not undertaken any feasibility studies of alternative ways for retaining and consolidating the works on site. These are 'reasonable alternatives' which the Applicant should have considered properly during site selection and reported in the Environmental Statement. This is of especial importance given that the submitted application involves relocation of an operationally sound works from within the built-up area onto a Green Belt site. The Planning Statement, para 2.3.33(b), states that it can 'reasonably be concluded' that 'consolidation [on site] would not release enough land for significant housing and therefore would not secure HIF, and relocation is not viable without external funding, so consolidation is not viable'. Neither part of that statement has been demonstrated</p>	<p>The Applicant has already responded to these points. Please see above responses to points 4.4 and 5.4.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>either in the application or in published local plan documents to be true, so this is merely an assertion.</p>	
<p>6.2</p>	<p>National Planning Policy Framework (NPPF) The PD does not comply with or meet key policies and principles in the NPPF, in particular those in para 11 (sustainable development), paras 130 to 132 (national design criteria) paras 137 to 150 (harm to Green Belt from inappropriate development) and para 202 (harm to significance of heritage assets).</p>	<p>The Applicant submits that the Proposed Development does comply with the relevant areas of the NPPF, taking into account the need and benefits fully described in the Section 2 of the Planning Statement (App Doc Ref 7.5) [AS-166]. An NPPF Accordance Table has been prepared by the Applicant which assesses the Proposed Development against the NPPF. This is being submitted as an Accompanying Report to the Planning Statement (App Doc Ref 7.5.4) included in the Applicant's submission at Deadline 1.</p> <p>As the Applicant has outlined in the responses above, 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).</p>
<p>6.3</p>	<p>The adopted Local Plans 2018 (CLP and SCLP) There is no substantive requirement, justification, or support, in the adopted or emerging local plans for the PD. Neither the CLP nor the SCLP contain policies that require or explicitly support relocation of the Cambridge WWTP, nor do they identify any suitable site for that relocation. The policies for NEC in those plans (SCLP Policy SS/4; Cambridge LP 2018</p>	<p>The Applicant has responded to these points above, see section reference, 4.3.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Policy 15) endorse employment-led development which is compatible with the continued presence of the Cambridge WRC within the area. The feasibility studies promised in those plans (SCLP para 3.34), to examine retaining the works on site against relocation options have never been undertaken and have not been brought forward in the evidence base in support of the emerging NECAAP. The PD includes development on land in both local plan areas, but in terms of policy compliance it is the SCLP that is of greatest importance. The PD is not compliant with or meets the requirements of numerous policies in that Plan, but in particular: Policies S/2(b) (protection of district character), S/4 (Cambridge Green Belt), HQ/1 (design), NH/2 (protection and enhancement of landscape character), NH/8 (mitigating impacts of development in or adjoining Green Belt) and NH/14 (protection of heritage assets).</p>	
6.4	<p>Minerals and Waste Local Plan 2021 (MWLP) The MWLP contains no specific reference to the relocation of the Cambridge WWTP. Policy 11 offers in principle support to new or extended 'water recycling facilities', where required for operational efficiency or to provide for growth proposals in adopted development plans. The Cambridge relocation into Green Belt does not meet these criteria. The PD does not comply with part (d) of this policy (inadequate mitigation measures for adverse environmental and amenity impacts). It also does not comply with other key policies in the plan including Policy 16 (f) (odour consultation areas), Policy 17 (most aspects of design),</p>	<p>The Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021 Policy 11 is a criteria-based policy where proposals for new water recycling infrastructure are brought forward.</p> <p>The Applicant believes it is relevant to note that Cambridgeshire County Council (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 Cambridge WWTP to be redeveloped for residential uses. This was contingent on the existing</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Policy 18 (amenity considerations) or Policy 21 (historic assets).</p>	<p>Cambridge WWTP being relocated off site. This is set out at paragraph 9.30 of the Cambridge Local Plan 2006.</p> <p>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:</p> <p><i>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.</i></p>
6.5	<p>North East Cambridge Area Action Plan (NECAAP) The emerging NECAAP is predicated on, but cannot require, the relocation of the CWWTP. NECAAP has only been advanced to a submission draft that will not be subject to public consultation or tested at Examination until after the DCO</p>	<p>Neither Local Plan requires the relocation of the existing Cambridge 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</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>application has been determined. The planning case for NECAAP is based on a radical proposition for comprehensive development of a high-density housing led neighbourhood, and the sustainability, viability, and deliverability of that have not been tested and it cannot be presumed to be sound.</p>	<p>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 established through the preparation of an AAP. The policy recognises the continuing aspiration and opportunity which could be realised if the existing Cambridge WWTP is relocated (see Cambridge City LP para 3.35).</p> <p>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 Cambridge 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.</p> <p>Resolution by the Councils to approve the Development Strategy Update (Regulation 18 Preferred Options) report on 6 February 2023 provides confidence of the Councils' position that NEC (predicated on the relocation of the existing Cambridge WWTP) should form one of three key strategic sites</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>which will form “central building blocks of any future strategy for development” in the next stage of GCLP Draft Plan (Regulation18) consultation. Based on up to-date evidence and with the benefit of consultation this means that the NECAAP and GCLP have effectively reached a stage where the evidence envisaged by paragraph 3.35 of the adopted Cambridge Local Plan 2018 (and paragraph 3.34 of the South Cambridgeshire Local Plan 2018) has been assembled and this spatial strategy should be accorded substantial weight.</p>
6.6	<p>Greater Cambridge Local Plan (GCLP) The GCLP has been proceeding alongside NECAAP. The First Proposals included NEC as proposed in NECAAP as one of six ‘strategic’ housing and employment locations in that plan, for development up to and beyond 2041. It presumes, but makes no provision for, the relocation of CWWTP and contained no development management policies against which the PD can be tested. The First Proposals were consulted upon in 2021, reported in June 2022. The GCLP preparation is now proceeding in line with the ‘strategic directions’ set in the Development Strategy Update, January 2023, which presented new, even higher, assessed housing needs and employment forecasts than were used for the First Proposals. The scope of the GCLP including the sites to be brought forward is therefore in flux and under critical review examining the implications of these forecasts, against infrastructure, sustainability, and deliverability considerations.</p>	<p>The Applicant refers to the long and consistent history of consideration of the existing Cambridge WWTP site for development.</p> <p>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:</p> <p>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</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Local Plan 1992 prepared by Cambridgeshire County Council.</p> <p>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.</p> <p>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).</p> <p>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</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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”.</p> <p>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.</p> <p>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.</p> <p>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</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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).</p> <p>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.</p> <p>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.</p>
7.1	<p>Relevant National and Local Policies.</p> <p>The Applicant accepts that the PD is 'inappropriate development' in the Green Belt (Planning Statement, para 4.8.35) and that the relevant Green Belt policy tests to be met if the application is to be approved are those set out in the NPSWW 2012 and more fully in the NPPF (NPPF paras 137 and 138, 147 and 148). Para 137 of NPPF states that 'The fundamental aim of green belt policy is '....keeping land permanently open. The essential characteristics of Green Belts are their openness and permanence'. NPSWW at para 4.8.4 states that '...the most important attribute of</p>	<p>The Applicant refers to the 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 submits</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Green Belts is their openness'. The NPSWW, para 4.8.18, states in wording essentially the same as para 137 of NPPF: 'Very special circumstances will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In view of the presumption against inappropriate development, the decision maker will attach substantial weight to the harm to the Green Belt when considering any application for such development'. As noted in Section 6, the adopted local plans, in particular the most relevant South Cambridgeshire Local Plan, contain Green Belt policies, which accord with and build on the NPPF. The principal relevant policies are Policies S/2b and S/4, both protecting the Cambridge Green Belt; Policy NH/2, protecting and enhancing landscape character and Policy NH/8, mitigating impacts of development in the Green Belt. As a matter of record, the LPAs have always been vigorous and generally successful in safeguarding the Cambridge Green Belt from piecemeal development over many years, particularly the relatively narrow but crucial gaps along the A14 and northern fringes of the Cambridge built up area that separate the 'necklace' villages such as Horningsea, Stow-cum-Quy and Fen Ditton from the City. Any releases of Green Belt through the local plan process have always been the subject of rigorous studies to determine, which are the most appropriate sites to be released. This is in contrast to the process adopted for the PD where the LPAs have essentially abdicated from involvement in selecting any or the least harmful site in the Green Belt, leaving it to the</p>	<p>that the very special circumstances needed to justify the grant of development consent in this instance have been demonstrated.</p>

Reference	Relevant Representation Comment	Applicant's Response
7.2	<p>Applicant alone, despite NECAAP being dependent on a successful outcome for this application.</p> <p>SHH Position on Green Belt The SHH position on Green Belt is that the plant itself, the earthworks and ancillary access works, taken together, are all 'inappropriate development' in the Green Belt. SHH will make further submissions to demonstrate that the PD as a whole will cause 'substantial harm' to the Green Belt. SHH takes the view that this harm should be rated as 'very high harm', not as assessed by the Applicant.</p>	<p>As set out at section 6.2 of the Planning Statement (App Doc Ref 7.5) [AS-128]. the Applicant submits that the very special circumstances needed to justify the grant of development consent in this instance have been demonstrated.</p> <p>The NPSWW requires that substantial weight should be given to any harm to the Green Belt and that other elements of harm should also attract significant weight. However, the Green Belt and other harm in this instance would, in the Applicant's opinion, be clearly outweighed by the need for the Proposed Development and the substantial cumulative public benefits it offers sufficient for the Secretary of State to conclude that the very special circumstances needed to justify a grant of development consent have been demonstrated.</p>
7.3	<p>The Applicant's Green Belt Assessment The Applicant submitted a Green Belt Assessment (AW 7.5.3), which concludes in para 6.1.6, that the proposal will cause only 'moderate harm' to Green Belt, on completion, and, in the Planning Statement, (4.8.44) that very special circumstances exist that outweigh any harm. SHH disagrees fundamentally with the reasoning and analysis that has been used to reach the overall conclusion of 'moderate harm' to Green Belt. SHH considers there has been an under-estimation of the adverse impact the PD would have overall on the Cambridge Green Belt and an overestimation of the reduction in harm the mitigation measures will achieve. The Applicant has used the methodology and</p>	<p>The Applicant has made an assessment of the Proposed Development's impact on the Cambridge Green Belt, including harm to openness. Please see section 4.8 of the Planning Statement (App Doc Ref 7.5) [AS-128].</p> <p>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</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>findings of the Greater Cambridge Green Belt Assessment undertaken by Land Use Consultants (LUC) in 2021 for the emerging GCLP, (Ref 5) as a key basis for their assessment, while noting in AW 7.5.3, para 2.2.2, that the LUC methodology 'is not directly applicable to this assessment'. The Applicant references relevant Green Belt studies, undertaken for the adopted Local Plans in 2002 (Ref 6) and 2015 (Ref 7), but does not draw on these, or the landscape character assessments carried out for the emerging GCLP (Ref 8) to inform their analysis. The LUC study was designed to work outwards from the urban edge defining and assessing the impacts and harm to Green Belt of potential land parcels for peripheral suburban housing extensions to Cambridge and to villages within the Green Belt. The methodology reflects this purpose and will, if anything, under-estimate the harm caused by an intrusive 'major industrial' plant, which would be free standing, highly visible and surrounded by Green Belt, away from the built-up area. The application site is a particularly important part of the very large 'outer area' of Green Belt (Parcel OA2) that LUC treat as a single area for the purposes of their assessment. The Applicant should have made a specific assessment of harm to openness and the purposes of Green Belt for the PD, including considering a bespoke set of land parcels defined around the application site, directly related to the spatial extent of the PD and of any likely visual impacts. A baseline and the impacts of the development should then have been examined for each of those parcels individually, and in combination, to provide a</p>	<p>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).</p> <p>At paragraph 2.2.1 of the Applicant's Green Belt Assessment, the statement is clearly made that <i>"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"</i>, 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.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>proper assessment of harm without mitigation and then taking account of mitigation. SHH takes the view that the overall conclusion of the LUC 2021 study that any form of urban expansion onto the large land parcel defined as OA2 in the LUC study will cause 'very high' harm to the Green Belt is a useful starting place (AW 7.5.3, para 3.3.11). However, the Applicant appears to have both misinterpreted that conclusion and then worked away from it to reach an incorrect judgement about the extent of harm to Green Belt from the PD.</p>	<p>Because the Proposed Development is a discrete development with a fully mitigated outline design, the LERMP (ES Chapter 8 Appendix 8.14 (App Doc Ref 5.4.8.14) [AS-066]) is 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].</p>
7.4	<p>Improving the Green Belt Assessment</p> <p>The Applicant's assessment is not sufficiently rigorous nor is it reported transparently. The assessment should have examined harm by: (i) undertaking an assessment using separately defined land parcels, individually and together. These principally cover the land between the four villages, with boundaries from the LUC study redrawn appropriately. (ii) Identifying the impacts of the development at completion assessed in terms of the impacts on openness, taking account of the height and nature of the plant proposed, considered in both spatial and visual impact terms. The 34 ha plant development itself creates a permanent and irreducible loss of openness of the land it occupies. (iii) Assessed the value of each land parcel in terms of the 3 purposes of the Cambridge Green</p>	<p>The Applicant has undertaken a Green Belt Assessment (Document Reference 7.5.3) [APP-207] of sufficient rigor, the results of which are transparently reported and summarised in the Applicant's Planning Statement (App Doc Ref 7.5) [AS-128].</p> <p>As stated in response to preceding point 7.3, 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</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Belt and the harm that the development would cause to those purposes. (iv) Once that had been done, the extent of any reduction in impacts and harm, principally visual, as a result of the mitigation measures, where these can be reasonably assumed to be in place after 15 years, can then be considered. SHH has not and should not have to undertake such an exercise. The Applicant should be asked to present a rigorous, transparent revised assessment. 7.5 Likely Harm resulting from Loss of Openness from Development The application site and all the adjoining Green Belt areas between the villages of Fen Ditton, Milton, Horningsea and Stow-cum-Quy form the relevant area of Green Belt for this assessment. It is divided by the A14 and does contain overhead high voltage power lines that traverse the northern area. The character of the Green Belt from the A14 northwards is one mainly of an open flat chalkland agricultural landscape, of large fields, with only very slight variations in levels. The River Cam Corridor and Quy Fen each have slightly different characters, but are still essentially open. The only buildings are small clusters of houses at Bait's Bite Lock and at Biggin Abbey, and one or two isolated farm cottages. There are only a few field hedges, trees and woodland in the core part of the area. The Green Belt between Fen Ditton and the A14 consists of large open arable fields, with hedges along more of the field boundaries and along the A14. The application site and surrounding areas of Green Belt are very flat, continuous open land characterised by long open views. Any harm from the PD will extend across the whole of the</p>	<p>taken in the Landscape and Visual Impact Assessment (LVIA) of the Proposed Development (App Doc Ref 5.2.15) [AS-034].</p> <p>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. That assessment was commissioned by Cambridge City Council (CCC) and South Cambridgeshire District Council (SCDC) to provide an independent and objective assessment of the performance of all Green Belt land across the two authorities which together form Greater Cambridge and will form an important piece of evidence informing the emerging Greater Cambridge Local Plan currently being prepared jointly by CCC and SCDC.</p> <p>At paragraph 2.2.2 of the Applicant's Green Belt Assessment, 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</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>visual envelope around the plant. Given the design of the earthworks and landscape planting, the permanent visual intrusion from the plant will actually be greatest in relation to middle distance views along Horningsea Road and High Ditch Road which are important visual approaches to the city, including Fen Ditton. An assessment of the impacts on Green Belt 'openness' should be focused on the permanent impacts of the above ground works, although there will be temporary loss of 'openness' across a much wider area of Green Belt within Order Limits during construction. The impacts on openness of the permanent works are best considered in terms of defined spatial zones which reflect locations where there are likely to be similar impacts. This allows both the spatial and visual components of openness to be considered. In simple terms, these impact zones, and the key elements of the impacts of the PD on openness, fall into four zones: (i) Built Development Zone: This comprises the plant, earthworks, and ancillary works such as the access roads and parking, all of which are inappropriate development. The Applicant presents this as some 34ha in extent. In this zone, the loss of openness from a high and tightly packed development is complete and will not reduce over time. (ii) Inner Impact Zone: This can be taken broadly as the landscape, ecological and recreational area around the plant within Order Limits. This and the Built Development Zone are described by the Applicant as the WWTP Parcel. There will be intentional physical change to the landscape of this zone as part of the PD as a result mainly of planting and small-</p>	<p>the Greater Cambridge Green Belt Assessment (LUC, 2021). In section 4, the Applicant's Green Belt Assessment then defines the land parcel comprising the '<i>specific new development scenario</i>' 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.</p> <p>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].</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>scale works, which are not, of themselves, inappropriate development. This area is c60ha in extent and corresponds to the land that will remain under long term management by the Applicant. The whole of this area will be dominated visually by the works on completion. It will mainly be within the predicted odour zone and there will also be plant noise, light and other impacts. There will be substantial permanent impacts on visual openness, which will only diminish slowly over time where screened by the peripheral tree and hedge planting. Those impacts need to be considered under winter conditions and at night. (iii) Middle Impact Zone: This comprises the remainder of a broadly circular zone which is up to around 400m from the outer edge of the plant and therefore around 700m from the centroid. This is predominantly open arable land, but includes a part of the A14 corridor. This is zone around 100 ha in extent. The plant will be visually significant across this area, by virtue of both its height and lateral. Scale. There will be permanent impacts on visual openness. These will reduce as the intervening planting matures, although the plant will remain visible to some extent and from particular viewpoints, notably in the winter and at night. (iv) Outer Impact Zone: This is a wider Green Belt zone from which the plant will be visible, extending from the Middle Impact Zone outwards generally to the village edges. This can, in broad terms, be described as a zone up to around 1300m from the centroid of the plant and covers all of the Green Belt between the edges of Fen Ditton and Horningsea; to the River Cam and the railway to the west and part way to</p>	

Reference	Relevant Representation Comment	Applicant's Response
	<p>Stow-cum-Quy. It includes further sections of the A14 corridor. This could be further divided into sub-zones for analysis, but is in total around 300 ha of Green Belt. There will be some permanent impact on visual openness across the majority of this area, although less than in the Middle Impact Zone. It will to some extent be reduced as planting matures although the taller parts of the plant will remain visible above the trees, particularly in the winter. Assessed in this way, it can be concluded that, in the Built Development Zone, there will be a complete spatial and visual loss of openness across a 34ha area, which will be permanent. Across the other zones, there will significant, and in places substantial, permanent loss of visual openness, covering up to 400ha of Green Belt, beyond the Built Development Zone.</p>	
7.6	<p>Likely Harm to Green Belt Purposes from Development The potential for harm from urban development to the purposes of the Cambridge Green Belt, as assessed in the LUC study, is summarised in section 3.2 of AW 7.5.3. This includes an analysis of the contribution of the wider parcel OA2 which includes the application site to the three purposes of the Cambridge Green Belt, with a conclusion set out in para 3.3.11. These purposes are as adopted in the local plans as an interpretation of the five purposes set out in the NPPF. The contributions made by parcel OA2 generally to the purposes of Green Belt were assessed by LUC as: Purpose 1: Preserve the unique character of Cambridge as a compact, dynamic, city with a thriving historic centre – limited or no contribution; Purpose 2:</p>	<p>As described in the Applicant's Green Belt Assessment, guided by the benchmark examples used to inform the assessment of overall harm to the Cambridge Green Belt purposes (included in Appendix B of the assessment) and taking into account the mitigation of effects over time and the enhancements to green infrastructure that would come with the landscape masterplan and the LERMP (ES Chapter 8 Appendix 8.14 (App Doc Ref 5.4.8.14) [AS-066]), the resulting harm of the proposed WWTP to Green Belt purposes would be moderate.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Maintain and enhance the quality of its setting - moderate contribution Purpose 3: Prevent communities in the environs of Cambridge from merging into one another and with the city – moderate contribution. Contributions to all three purposes made by the land parcels between Fen Ditton and the A14 are all rated as 'significant' or 'relatively significant', leading to a conclusion of 'very high' harm from urban development. Harm from the release of land in OA2 for urban development is also judged by LUC to be 'very high', but the conclusion reported in para 3.3.11 is ambiguously drafted. SHH disagrees with the Applicant's interpretation of that conclusion. The entirety of the Green Belt forming the Horningsea – Fen Ditton gap to the north of the A14 is of great importance in maintaining and enhancing the quality of the rural landscape setting of the city and in preventing communities from merging with one another. The importance and special character of these open landscapes in maintaining the rural setting of the city is stressed in earlier Green Belt studies, notably the 2002 Study. On that basis, the Built Development and Impact Zones to the north of the A14 all make contributions that are 'significant' in relation to Purpose 2 and at least 'relatively significant' to Purpose 3. Contributions to all three purposes made by the land parcels in the Impact Zones between Fen Ditton and the A14 can all be rated as 'significant' or 'relatively significant', in line with the LUC judgements. Taken overall, considering the industrial form of the development and the sustained impacts on</p>	

Reference	Relevant Representation Comment	Applicant's Response
	openness, harm to the Green Belt from the PD should be judged to be 'very high'.	
7.7	<p>Overall Green Belt Harm SHH takes the view that the overall harm caused to an important part of the Cambridge Green Belt will be 'substantial' and should be rated as 'very high'. This will be the case during construction and persist following completion. The harm caused by the plant development itself (i.e., the Built Development Zone) is permanent and irreducible. Outside the Built Development Zone, maturing mitigation planting measures may reduce the impacts on openness, but only to a very limited extent, across the wider visual envelope. Overall, this means that the harm to Green Belt will remain 'very high'. This analysis is consistent with SHH's interpretation and response to the ES landscape and visual amenity assessment, set out in Section 10. Further representations and evidence in support of these SHH views will be presented, if necessary, but the overall conclusion is that the harm to the Cambridge Green Belt from the PD must be judged as 'very high' from the outset and that this rating does not reduce over time for much of the land within the visual envelope all of which is Green Belt.</p>	<p>As stated above, the NPSWW requires that substantial weight should be given to any harm to the Green Belt and that other elements of harm should also attract significant weight. However, the Green Belt and other harm in this instance would, in the Applicant's opinion, be clearly outweighed by the need for the Proposed Development and the substantial cumulative public benefits it would deliver sufficient for the Secretary of State to conclude that the very special circumstances needed to justify a grant of development consent have been demonstrated.</p> <p>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 follows.</p> <p>Environmental benefits through the delivery of a new modern, low carbon waste water treatment facility:</p> <ul style="list-style-type: none"> • 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) • 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)

Reference	Relevant Representation Comment	Applicant's Response
		<ul style="list-style-type: none"> • 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) <p>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.</p> <p>Social benefits through:</p> <ul style="list-style-type: none"> • 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)

Reference	Relevant Representation Comment	Applicant's Response
		<p>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.</p> <p>Economic benefits through:</p> <ul style="list-style-type: none"> • 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. <p>The most significant benefit is that decommissioning and release of the existing WWTP site would 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</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>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.</p> <p>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.</p>
8.2	<p>Plant Capacity, Design Life and Sizing The Applicant has not provided sufficient quantitative information in the application on the planned capacity of the plant the consent for which is being sought as part the DCO. The Phase 1 and Phase 2 capacities have been quoted as 275,000 and 300,000 Population Equivalent (PE), for several years, without supporting evidence. A sludge treatment centre for 16,000 tonnes dry solids. In the ES, these figures are set out in para 2.15.2. Phase 2 is stated as being required 'sometime between 2036 and 2050. In the Planning Statement, para 2.2.13, it is suggested that this may be needed as 'early as 2035'.</p> <p>At the same time, in paras 2.2.3 to 5 of the PS, it is claimed that the works has been designed to accommodate the</p>	<p>The Design and Access Statement (App Doc Ref 7.6) [AS-168] describes the objectives and the design principles and considerations that have informed site selection and design development of the proposed Cambridge Waste Water Treatment Plant. In particular Section 2.3 states: <i>"The proposed WWTP will be sized for a design horizon of 2041 based on a 300,000 population equivalent (PE). The design basis is in alignment with the population growth estimates being used in the emerging Greater Cambridge Local Plan.</i></p> <p>Figure 3.2 in ES Chapter 2 Project Description (App Doc Ref 5.2.2) [APP-034] illustrates the operational years for Phases 1 and 2, with Phase 1 operating between 2028 and end of 2035,</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>housing needs to be met in the emerging Greater Cambridge Local Plan. It is not clear whether this statement refers to the capacity to be provided in Phase 1 or Phase 2 of the application, nor whether the whole of the housing proposed in the First Proposals GCLP has been taken into account or only that anticipated by 2041. The most recent GCLP Development Strategy Update, January 2023, is in any case exploring the need to accommodate housing and employment needs by 2041 substantially above those in the First Proposals.</p>	<p>Phase 2 commencing in 2036 and expansion to full capacity also in 2036.</p> <p>The GCLP provides a current view of the growth in the Cambridge catchment until 2041. The Applicant has worked with the City Council and South Cambridgeshire District Council to ensure the proposed development allows for forecast growth proposed through the local plan system. For example, the required additional capacity for the Waterbeach New Town development has been calculated from the build out rate of two developments, with the assumption that 3,000 properties will be built by mid-2030 and the remaining 7,000 properties built by 2050.</p>
8.2	<p>No information is presented about the capacity or throughput of the existing works at present or at the baseline date for forecasting need. The published capacity of the existing works in 2016 was officially stated to be 200,000 PE, with the highest recent annual influent flow (Ref 9), in 2022, reported as 194,000 PE. From published data, it is known that the actual dry weather flows being treated are substantially above the permitted flow, as set out in the latest Discharge Permit.</p>	<p>The Applicant can confirm that the existing Cambridge WWTP was assessed to be capable of biologically treating 270,000 PE. The most recent figures are the most accurate given they take into account existing infrastructure and performance and represent what the existing Cambridge WWTP treats as flows presented to it, not what it has capacity for.</p>
8.2	<p>The Planning Statement and the ES Chapter 1, both in para 1.3.3, make assertions about the 'design life' of the works as being 'to at least 2090' and 'within the earth bank, space to the early 2100s', but with no supporting analysis for those statements.</p>	<p>The Applicant notes the comments and can confirm that the Design and Access Statement (App Doc Ref 7.6) [AS-168] describes the objectives and the design principles and considerations that have informed site selection and design development of the proposed WWTP.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>SHH is concerned that, given very constrained footprint for the circular plant being applied for, with only a small area noted on the Works Plans as being kept aside for post Phase 2 expansion, that this space will be inadequate and, given that the treatment process is sequential, there may not be appropriate space in each stage of the plant to deliver the necessary plant. Any expansion of the plant outside the circular earth bank would be clearly unacceptable and would destroy the carefully conceived and implemented landscape around the plant.</p>	<p>As illustrated on drawing Sheet 11 of the Works Plans – Change Request (App Doc Ref 4.3), an area has been set aside within the earth bank for 'future works'. The Applicant is satisfied there is sufficient space within the proposed earth bund to upgrade the works to treat approximately 600,000PE, using existing technologies and assuming there are no significant changes to permitted requirements.</p>
8.3	<p>Landscape Character and Features SHH will make further representations that establish that key aspects of the landscape character and setting have not been adequately addressed by the submitted design. The South Cambridgeshire District Design Guide, referring to the chalklands on which the site is located, describes them as typically a 'gently undulating chalk plateau' comprising 'a mostly largescale landscape of arable fields, low hedges, few trees.'</p>	<p>The Applicant notes the comment and directs the ExA to the assessment of effects on landscape character and proposed mitigation measures are presented in ES Chapter 15 Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034].</p>
8.4	<p>The Approach to Design of Structures and Landscaping SHH takes issue with many aspects of the design as it has evolved and is currently proposed, taking account of the justifications provided in the Design and Access Statement (AW 7.6) and will present a full design critique based on these in further representations:</p> <p>a) The selection processes of site, road access and basic design solution have been insufficiently transparent and shared.</p>	<p>The Applicant notes that SHH will submit further comments on the Approach to Design and Structures and Landscaping.</p> <p>a) The Applicant has shared in Community Working Groups and in the Consultation Report (App Doc Ref 6.1) [AS-115] details of how the design for the facility has progressed and how comments received from consultation have been taken into consideration.</p> <p>b) The Applicant acknowledges SHH's concerns regarding location, concealment, odour containment and road access.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>b) Local communities' preferences, as regards location, concealment, odour containment, and road access received little attention. For instance, a proposal which would have made the A14 safer, whilst providing access to and from the site for construction and operational traffic, was not pursued sufficiently.</p> <p>c) The size of the plant and the amount of traffic it generates in operation, should have been reduced as much as possible by excluding the importation and processing of sludge, which would to an extent have reduced the impact on the Green Belt.</p> <p>d) Rigorous testing of possible design solutions using a comprehensive set of performance criteria does not appear to have occurred.</p> <p>e) An early decision creating a superimposed formal solution which fails to meet what should be the design criteria has eventually resulted in measures which appear to be trying to mitigate that solution. The 'hill-fort' or 'rotunda' form is alien to this countryside, too intrusive and providing insufficient concealment. Its reliance on tree growth to screen views of the plant is too protracted. The earthwork, and the facility it contains, appear to have been thought of as separate entities and the design should have been approached holistically.</p>	<p>These were responded to within the Consultation Summary of the Consultation Report (App Doc Ref 6.1) [AS-115]. The Applicant notes the comments and confirms that modelling information in the ES Chapter 18 Odour (App Doc Ref 5.2.18) [APP-050] shows a negligible level of odour at the proposed facility. The Applicant confirms that there has been further design development to mitigate odour, including there now being only one filtered vent shaft. Further modelling information is also available in ES Chapter 18 Odour (App Doc Ref 5.2.18) [APP-050]. In line with the Institute of Air Quality Management (IAQM) guidance the odour modelling has been assessed on the worst year out of the 5, not averaged over the 5 year period. Application document 7.6 Design and Access Statement [AS-168] describes the objectives and the design principles and considerations that have informed site selection and design development of the proposed WWTP.</p> <p>c) It is not possible to reduce the amount of imported sludge generated within the existing Cambridge catchment. To do so would require transportation to another sludge treatment facility. The nearest alternative centers would be Flag Fen in Peterborough or Kings Lynn in Lincolnshire which are both outside the Cambridge catchment.</p> <p>The following documents describe the objectives and the design principles and considerations that have informed site selection and design development of the proposed WWTP.</p> <ul style="list-style-type: none"> • Design and Access Statement (App Doc Ref 7.6) [AS-168]

Reference	Relevant Representation Comment	Applicant's Response
	<p>f) While some effort has been made to reduce the effective height of tall plant this has been insufficient. The explanation for the placing of the tallest plant relies on a simplistic placing of these equidistant from Fen Ditton and Horningsea villages, rather than a proper assessment of visual impacts.</p> <p>g) Apart for the Discovery building, there is limited illustration, except in the outline sectional and elevational drawings and amorphous photomontages, of the form the plant's structures will take or if the design objectives that should be, are being achieved.</p> <p>h) Given the prestigious nature of the city, the Applicant's conception of the project as of national significance, the sensitivity of the site and the complexity of the design problem, a design team with a track record in delivering top class engineering, architectural and landscape solutions should have been appointed. The Applicant apparently took advice from a Design Council panel and other experts, none of which has been made public.</p> <p>i) The nature of the landscape surrounding the site and the properties of the immediate topography do not appear to have been fully appreciated or taken account of in the design.</p> <p>j) The design does not work with the landscape nor respect sufficiently the heritage assets that will be affected. The</p>	<ul style="list-style-type: none"> • Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [AS-066] • ES Chapter 15 Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034] • Consultation Report (App Doc Ref 6.1) [AS-115] <p>d, e, i, j and k) The following documents describe the objectives and the design principles and considerations that have informed site selection and design development of the proposed WWTP, including assessments of and mitigation for construction and operational effects on landscaping, lighting and the historic environment.</p> <ul style="list-style-type: none"> • Design and Access Statement (App Doc Ref 7.6) [AS-168] • Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [AS-066] • ES Chapter 15 Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034] • ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) [AS-030] • ES Chapter 15 Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100] • Consultation Report (App Doc Ref 6.1)[AS-115] <p>g) The Applicant has taken on board comments and concerns raised during consultation to reduce the height of the tallest structures across the whole of the proposed WWTP, as reported in the Consultation Report (App Doc Ref 6.1) [AS-115].</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>landscape scheme has sought to meet numerous competing requirements, including screening, biodiversity, and recreational access, with only partial success. The result is out of keeping with the irregularly and thinly divided openness of the host landscape, with long views. It is an extraordinarily congested and over complex scheme. Elements of it, including the planting on the earth bank are far too formal and unnatural in conception. Too little thought has been given to how it can be effectively brought to maturity and managed including the recreational use which it will attract.</p> <p>k) The importance of the conservation areas of Fen Ditton, Horningsea and Baits Bite along, with the grade II* listed Biggin Abbey and other heritage assets, warrant a design solution in which these heritage assets stay outside any possible visual association with the new plant.</p> <p>l) Plant lighting should be designed to minimise any light spill upwards or outside the containing bank in this open countryside location.</p>	<p>Not only has the Applicant been able to minimise the visual impact of the tallest structures but also reduced the impact of the earth bank itself whilst still screening the vast majority of the process elements proposed to be constructed behind it. The Design and Access Statement (App Doc Ref 7.6) [AS-168] elaborates on each area and shows the design development.</p> <p>A full assessment of Visual impacts is set out in Chapter 15 of the ES Chapter Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034].</p> <p>h) The Applicant has sought professional advice for the Design and Access Statement (App Doc Ref 7.6) from Owers Warwick Architects in Cambridge and the Landscape design has had significant input from Robert Myers Associates. Both have been represented during the consultation phase Webinars.</p>
8.5	<p>Detailed Design Concerns SHH will make specific representations about the details of the submitted design, including:</p> <ul style="list-style-type: none"> (i) The need to lower the finished base level of the plant further and to reduce the designed heights of the taller structures. (ii) The need to provide a higher single circular earth bank that will be above 5m above external 	<p>The Applicant notes the response and directs attention to the following documents that outline how the design of these elements were developed taking account of consultation feedback, including from local residents and Save Honey Hill, and assessed for landscape and visual effects and mitigation measures.</p> <ul style="list-style-type: none"> • Design and Access Statement (App Doc 7.6) [AS-168]

Reference	Relevant Representation Comment	Applicant's Response
	<p>existing ground levels and make this subject to binding design parameters in the DCO. The segmented 'catherine wheel' design is a wasteful use of available excavated material, with no advantages in terms of delivering effective screening of views. The enclosing earth bank needs to appear as natural as possible, with shallow feathered external slopes that can be planted to maximum early effect.</p> <p>(iii) Planting on the earth bank needs to be rethought avoiding reliance just on an extremely narrow hedge with trees on the summit of the bank.</p> <p>(iv) The nature of the woodland, tree and hedge planting proposed, which now intends too much use of standard and semi-mature tree stock.</p> <p>Reiterating concerns evidenced in responses to the Phase 3 consultation, relating to the high risks of failure and slow tree growth on this site. We note that the Applicant has taken some notice of these in the LVA assessment, but will explore further whether additional design changes or management measures are needed.</p> <p>(v) The need for more advance planting of trees and hedges, in particular, making those tree and hedge belts wider.</p> <p>(vi) The need for additional off-site landscape planting to screen the plant in views from Horningsea Road and High Ditch Road. An additional public footpath and cycleway needs</p>	<ul style="list-style-type: none"> • Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [AS-066] • 5.2.15 ES Chapter 15 Landscape and Visual Amenity [AS-034] • Consultation Report (App Doc Ref 6.1) [AS-115] <p>ii) The LERMP (APP 5.4.8.14) [AS-066] in paragraph 3.3.1 describes the design of the earth bank: <i>The earth bank will comprise four curved landforms, organic in shape, which will encircle the proposed WWTP and will screen or partially screen the structures and buildings within the proposed WWTP from the first day of operation of the Proposed Development. The earth bank profile is asymmetric, with a steeper 1:2.5 (maximum) interior slope and an outer slope between 1:2.5 and 1:5 where the landforms are at their widest. The gentler gradient of the outer slopes will soften the bank profile, enabling better integration with the surrounding landscape.</i> Figure 3.4 shows a typical section of the earth bank. The slopes will be seeded with a mix to create calcareous/neutral loam grassland.</p> <p>iii) Trees and hedgerow will be planted in a flat area 6m wide along the spine of the four landforms which make up the earth bank. The planting zone is 3.5m wide and there is a 2.5m wide grassed maintenance zone next to it. This is illustrated Figure 3.4 in the LERMP (App Doc Ref 5.4.8.14) [AS-066]. There will also be trees at the base of the earth bank. Where the curved landforms intersect, the planting along the spines of the</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>to be provided along High Ditch Road. Both of these points are set out in Section 13.</p> <p>(vii) Given the likely attractiveness of the land around the plant for informal recreational use, the very limited extent of visitor parking on site needs to be justified. If inadequate parking is provided, unwanted roadside parking or incursions into the landscaped areas will occur.</p>	<p>landforms will overlap in views giving the impression of planting on the bank. This is illustrated in Figure 3.5 in the LERMP (App Doc Ref 5.4.8.14) [AS-066]. The width of the planting zone and maintenance zone provide a total of 6m width of flat land for trees and hedgerows to grow in. This is sufficiently wide to provide sufficient root zone for the planting proposed here.</p> <p>iv) The inclusion of extra heavy standard and semi-mature trees in the Landscape Masterplan was in responses to consultation with Stow cum Quy Parish Council on 27 April 2022 and Quy Fen Trust on 27 April 2022. This is to provide some immediate filtering of views of the proposed WWTP in summer when the trees are in leaf. Growing conditions will be drier at the top of the bank than at the base and tree and hedgerow species will be selected to withstand the drier conditions.</p> <p>v) All planting will be carried out in the winter months (during the dormant season) for the best chance of establishment. The LERMP (App Doc Ref 5.4.8.14) [AS-066] sets out the requirements for watering in paragraph 4.2.2. The new planting on the earthwork bank will be watered in periods of drought for the first five growing seasons after planting. New planting on the rest of the site will be watered if required in the first growing season during periods of prolonged drought. in drought conditions.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>vi) Advance planting will take place during the construction period comprising a hedge with standard trees along the southern side of a section of Low Fen Drove Way, a woodland belt approximately 7.5m wide along the southern and western boundaries and part of the eastern boundary of the proposed WWTP site and trees planted in gaps between existing trees along the eastern side of Horningsea Road between Low Fen Drove Way and Horningsea. In addition, an existing shelter belt between the WWTP site and Horningsea will be rejuvenated with trees and shrubs to replace failed planting and ongoing landscape maintenance to promote establishment and improve growth rates. This is shown in the LERMP (App Doc Ref 5.4.8.14) [AS-066].</p>
8.6	<p>DCO Design Requirements SHH has noted the Design Objectives now set out in the Design and Access Statement (AW 7.6) Section 11.2. These extend the initial design objectives apparently followed in scheme development. SHH questions whether appropriate design objectives were adopted or have been met in the scheme design. Given the intention that this longer set of objectives is to be the basis for the DCO Requirement that detailed design 'must accord with these design objectives', SHH believes that these are not sufficiently clear and precise to ensure that the LPAs have sufficiently authoritative guidance and support to ensure that a high-quality design is approved, in due course, if the DCO is granted. The Requirement needs to be tied to improved specific benchmark designs, to be considered and included as part of any approval of the DCO.</p>	<p>The Applicant submits that the dDCO Requirement requiring the detailed design to accord with design objectives (R7(2) at page 50 of (App Doc Ref 2.1) [AS-010] is appropriately drafted.</p> <p>There is no requirement for a "bench mark" design to be referenced, as suggested by SHH, such an approach would be premature, requiring a detailed design to be produced prior to grant of the DCO; an approach which is not compatible with the "outline" design principle adopted by this and other DCO projects.</p> <p>The Applicant submits that the design objectives are clear and appropriate and that the Design and Access Statement (App Doc Ref 7.6) [AS-168] provides sufficient detail on preferred design approaches (e.g., see Chapter 9 - Engineering and Architectural Proposals - page 135-164) to allow the local</p>

Reference	Relevant Representation Comment	Applicant's Response
		planning authority to secure a detailed design of appropriate quality.
8.7	National and Local Design Policy Compliance The Applicant claims, in AW 7.6 at paras 11.2.5 and 11.2.6, that the submitted scheme meets the design policy requirements set out in the NPSWW (in section 3.5 and paragraphs 4.5.14, 4.8.19, 4.9.8 and 4.9.12) and in the NPPF (at paras 126 and 130). SHH will make representations that the scheme does not comply sufficiently with those policies, nor with the relevant Green Belt and other policies in the NPPF. The submitted scheme does not meet the design, countryside, or Green Belt policy requirements in the adopted SCLP, CLP or the MWLP.	The Applicant acknowledges this concern and the justification for the development within green belt land is outlined in application document 7.5 Planning Statement [APP 166], including the Very Special Circumstances case, in particular paragraphs 6.2.6 to 6.2.12 which details the assessment of sites, the suitability of the chosen site, and outlines the lack of alternative sites available.
9.2	Carbon Net Zero. AW's two corporate objectives, operational net zero by 2030 and reducing carbon used in building and maintaining assets by 70% from a 2010 baseline (AW 5.1 para 4.4.1) do not take account of the carbon emissions associated with demolition of the existing works. Given the new build nature of the project, these targets are unambitious especially as AW is only 'striving' to meet the 70% reduction target (AW ES 5.2.10; 2.9.1). The PD should seek to substantially exceed the targets to help drive down Anglian Water's overall corporate carbon footprint	The Applicant notes the comments. the Environmental Statement Chapter 10 Carbon (App Doc Ref 5.2.10) [APP-042] provides an assessment of carbon emissions and proposed mitigation measures for the decommissioning of the existing facility, construction of the Proposed Development (including embedded carbon in materials), land use change (the net impact land permanently required for the Proposed Development) and the operation of the Proposed Development. The targets set out in this chapter are appropriate and in line with the Applicants PAS 2080: 2016 Accredited Carbon Management process.
9.2	While Table S1 of the Carbon Assessment Waste Water Transfer Infrastructure sets out the emissions of two transfer options for returning treated affluent and stormwater to the River Cam there is no comparison with	The Applicant notes the comment. An option of retaining the site had not been considered in the Carbon Assessment Waste Water Transfer Infrastructure, as it would not provide the strategic outcome of freeing up the existing site land to

Reference	Relevant Representation Comment	Applicant's Response
	<p>the 'do nothing' option, i.e. retention of the plant at the current site. While Table S1 of the Carbon Assessment Waste Water Transfer Infrastructure sets out the emissions of two transfer options for returning treated affluent and stormwater to the River Cam there is no comparison with the 'do nothing' option, i.e. retention of the plant at the current site.</p> <p>SHH will challenge the calculations in the comparison of counterfactual option with proposed option described in the Strategic Whole Life Carbon Assessment (PS 7.5.2 p12). The carbon expenditure assumptions for retention at current site with a suburban housing development are estimates only; no such location has been identified, so commuting, construction vehicle movements and housing structure emissions cannot be calculated. No allowance has been included for demolition in the PD calculations.</p>	<p>facilitate the regeneration of the North east Cambridge area. The Strategic Carbon Assessment (App Doc Ref 7.5.2) [APP-206], provides an assessment of the carbon benefits of relocation vs the retention of the existing site and development of an equivalent volume of homes in an alternative suburban location.</p> <p>The Applicant notes the comments and that SHH challenge the calculations set out in Strategic Carbon Assessment (p12) (App Doc Ref 7.5.2) [APP-206]. The Applicant sets out below its comments on the counterfactual option.</p> <p>The purpose of this strategic high-level assessment was to compare 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.</p> <p>In terms of a settlement that could represent a reasonable median comparator for the purposes of this strategic carbon assessment, it would seem unreasonable to compare the proposed development site both with a dispersed village settlement, or with an identical site in terms of housing density and location, given that it is these characteristics that make the North East Cambridge site unique. Hence, a generic suburban settlement with characteristics broadly in line with the sites on which 8,350 new homes could feasibly be delivered in Greater</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>Cambridge was chosen as a reasonable median comparator, e.g. Northstowe and Cambourne.</p> <p>The rationale for proceeding with the proposed development is that it would utilise Cambridge's last major brownfield site, bringing with it increased housing density, better public transport links and reduced commuting distances.</p> <p><i>Housing</i></p> <p>A key methodological difference is that the GIA of the proposed North East Cambridge site is smaller than the suburban counterfactual site. This is due to several factors, including increased market demand for larger homes in suburban locations and National Space Standards (NSS) requirements in suburban locations compared to urban locations. Useful Projects used Northstowe as a proxy for the suburban site, given that this is one of the sites on which 8,350 new homes could feasibly be delivered in Greater Cambridge.</p> <p>It is important to note that the same embodied carbon factors for housing and infrastructure have been used across both 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 likely have a significantly lower infrastructure load.</p> <p><i>Commuting</i></p> <p>Greater Cambridge Shared Planning, in the process of developing their new Local Plan 2041, have undertaken a strategic spatial options appraisal. A modelling tool was created</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>by Bioregional which analyses whether there will be different levels of carbon emissions depending on where the local plan allows new homes and facilities to be built. The model accordingly divides the different possible growth locations into six generic location categories within which the emissions of each home would be expected to be roughly similar.</p> <p>A key element of these operational carbon emissions relates to transport and the tool distinguishes between these categories by looking at the likelihood that journeys will be walked, cycled, driven, or made with public transport in each of these locations.</p> <p>The North East Cambridge site is a brownfield site located close to the City of Cambridge and within walking distance of Cambridge North Railway Station. It is hence categorised as 'urban'. The counterfactual site is assumed to have excellent public transport links. It would likely be linked to, for example, the Cambridgeshire Guided Busway and its adjoining cycleway, connecting the site directly to the City of Cambridge, Cambridge North Railway Station, beyond to the south via transport interchanges in the city, and to the north via the market towns of St Ives and Huntingdon. It is hence categorised as a 'public transport corridor', the next lowest location category in terms of emissions per home.</p> <p>With regards to embodied carbon, a key methodological difference is that vehicles per household data for Cambridge City is used as a proxy for the North East Cambridge site, whilst vehicles per household data for Cambourne is used as a proxy for the counterfactual site. Like Northstowe, Cambourne is a</p>

Reference	Relevant Representation Comment	Applicant's Response
9.2	<p>Demolition of the Existing Plant. SHH challenges the calculations of potential whole life carbon emissions to 2080 (AW 5.2.10 Table 4- 8) given they do not include demolition. Around 10% of the embodied CO₂e in buildings is released during demolition and transportation, processing, and disposal of construction waste. SHH takes the view that this and any ground remediation of the existing site should have been included in the scope of the ES. Any developer has a reasonable expectation that it does not need to account for this carbon in any part of the consenting for their project. SHH believes that demolition of the key components described in Section 6 of the Outline Decommissioning Plan is likely to emit a high level of GHG and should be included in the whole-life calculations (AW 5.4.4.3; para 6.2). The decommissioning plan indicates CO₂e of 10 tonnes (AW 5.4.10 Appendix 10.1) but there is insufficient detail to calculate carbon emissions associated with demolition of the key structures, such as the terminal pumping station, pipelines, primary settlement tanks and final settlement tanks. The British Standards Institution sets out a code of practice for full and partial demolition. The Applicant does not appear to have recognised this (Ref 13).</p>	<p>site on which 8,350 new homes could feasibly be delivered in Greater Cambridge.</p> <p>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.</p> <p>Emissions from the demolition of the existing Cambridge WWTP are not part of the scope of the assessment within the ES Chapter 10 Carbon (App Doc Ref 5.2.10) [APP-042]. Demolition 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. 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. ES Chapter 2 Project Description (App Doc Ref 5.2.2) [AS-034], 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].</p>

Reference	Relevant Representation Comment	Applicant's Response
9.3	<p>Waterbeach Pipeline. The intention is to build a section of the pipeline from the CWWTP relocation site to the existing works under the River Cam and railway, which will be redundant after a very short time. This certainly involves unnecessary and avoidable carbon emissions. The Applicant has not presented a comparison of the carbon footprint of the submitted scheme against an alternative local works to serve Waterbeach and the new town. The Applicant also needs to confirm if Waterbeach effluent pumping has been included in the operational energy demand calculations</p>	<p>The Applicant notes the comment. The option of providing an alternative Water Recycling centre for Waterbeach was considered as an option in 2018 as part of the drainage strategy for the Waterbeach New Town Development. This option was discarded after an initial pre-application for planning permission because such a facility was objected to by the Cambridgeshire County Council and the Environment Agency as inappropriate for the location. The alternative option of a pipeline to transfer flows to the existing Cambridge WWTP is set out in the Statement of Requirement (App Doc Ref 7.2) [APP-201].</p>
9.4	<p>Renewable energy The Project Description describes two options for using the biogas generated at the STC. Anglian Water should provide data to support the assessment claimed in AW 5.2.10-Carbon para 4.4.7 that the preferred Gas to Grid option will result in the calculated overall net emissions of -3,490 tCO₂e/year, a reduction of 4680 tCO₂e/year against the 2010 baseline solution. It is not clear that the existing gas grid system is capable of using the biogas generated although Project Description, para 2.4.23 states propane injection would be required.</p>	<p>The Applicant has used an industry recognised carbon model that aligns with PAS2080 and has assured itself that the carbon calculations used in its ES assessment are robust and appropriate as described in the ES Chapter 10 (App Doc Ref 5.2.10) [APP-042].</p> <p>The Applicant has engaged with Cadent and confirmed with them that the local medium pressure gas network can receive the enhanced biomethane proposed to be produced on the proposed WWTP. It is quite common that a small amount of propane is indeed blended with the biomethane before injection.</p>
9.5	<p>Conclusion The Applicant's carbon assessments are inadequate in that these fail to include integral parts of the scheme, in particular, the demolition of the existing works. The assessment should have considered the realistic alternative of retaining and improving the existing works in situ, thereby identifying and quantifying the substantial</p>	<p>The Applicant notes the response and refers to the Applicant's response above to point 9.2 in regards to Save Honey Hill's Carbon Net Zero comment.</p> <p>Construction of a proposed WWTP on the existing site is also not technically feasible whilst maintaining the existing</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>unnecessary and 'avoidable' carbon emissions arising from the construction and demolition involved in the replacement of the existing facilities. The existing works could be made operationally net zero or close to that</p>	<p>operational facility. Consolidation would require construction of new elements of plant which would be complex and not deliver an efficient reduction in land take to help South Cambridgeshire District Council achieve their long-held ambition to regenerate that part of the city where the existing plant is located.</p>
<p>10.1</p>	<p>Adequacy of the Environmental Statement SHH has examined as far as possible in the time available the Environmental Statement submitted. In our view, as set out in Section 5, the ES fails to meet the requirements in Schedule 4(2) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 in that it fails to set out an adequate assessment of the 'reasonable alternatives', namely the options for retention on the existing site. Any assessment should have included 'a comparison of the environmental effects' of that option against other options, including the 'main reasons' why it was not selected. The ES is also deficient in that it did not consider the demolition, remediation, and disposal of materials from the existing Cambridge WWTP site as an integral part of the project for EIA purposes.</p>	<p>The Applicant notes the comments. The selection of the site for the proposed WWTP was a result of an extensive process undertaken by the Applicant which is fully described in the Site Selection and Alternatives chapter of the ES (App Doc Ref 5.2.30) [AS-018]. The applicant followed a thorough and systematic criteria- based approach to both the initial identification of potential sites and to the final site selection. The site selection provides robust justification for why areas of search were identified and dismissed or taken forward. The final site selection was also the subject of comprehensive public consultation and engagement.</p> <p>In the Planning Statement (App Doc Ref 7.5) [AS-128] the Applicant has set out full details of why if the existing Cambridge WWTP were to remain in its current location the full NEC development would not take place.</p> <p>The Applicant considers it is appropriate to exclude demolition of the existing WWTP from the DCO application. 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</p>

Reference	Relevant Representation Comment	Applicant's Response
		(NEC) development. The Assessment of environmental impacts will be governed by that consenting process.
10.3	<p>Community: Recreational Use of the Site and Public 'Rights of Way' The PD will create a large area of green space to which public recreational access will be permitted. Given the proximity to Cambridge and nearby villages and the demand that exists for countryside access, the Applicant must make provision for the on-site parking of recreational visitors' vehicles, in order to mitigate the adverse effects of unwanted roadside and verge parking both on Horningsea Road or Low Fen Drove Way. There is also no provision in the Order to address the continued existence of and management of Low Fen Drove Way (LFDW), which is a narrow, unmade highway, but also an important part of the footpath and bridleway network. At its western end it is adjacent to the relocated works and to the land which will attract recreational visitors. These measures are needed to avoid or reduce inessential public vehicular use of LFDW, trespass and associated problems.</p> <p>As part of the overall package of measures proposed to deliver improved access and management of the public path network, including the paths being created by the PD, a mitigation provision of a new cycleway and pedestrian path along a short stretch of High Ditch Road joining public paths from the Marleigh development and the Park and Ride site with LFDW (integrated with additional planting) should be made. SHH made this proposal and that relating to LFDW during the Phase 3 Consultation and will make further submissions on these points.</p>	These issues are addressed in the Applicant's response to ExA's questions 7.24 and 7.25.

Reference	Relevant Representation Comment	Applicant's Response
10.4	<p>Historic Environment</p> <p>Significant Effects The HE assessment, (AW 5.2.13) para 4.2.36, identifies a residual permanent 'large adverse significant effect' arising from the necessary removal of archaeological remains. This cannot be mitigated further than the provisions of the AIMS. SHH agree with this assessment. The PD will give rise to predominantly indirect impacts on other designated historical assets, mainly affecting the settings particularly of Biggin Abbey (Grade II*) and Poplar Hall (Grade II) and the settings and approaches to the Fen Ditton, Bait's Bite Lock and Horningsea Conservation Areas, which include some 49 listed buildings. In reviewing the assessment, SHH has applied the guidance from English Heritage, in responding to the CWWTPR EIA Scoping Report that 'an assessment of setting should not be limited by visual receptors, i.e. visibility of site but also how the assets are approached or traversed, the spatial, historical and functional relationship of assets to one another and the wider historic landscape, as importance of the approaches to the conservation areas as integral parts of their settings, in particular High Ditch Road approaching Fen Ditton, and Horningsea Road, north of the A14, in the case of Horningsea. The Landscape and Visual Assessment under-estimates the permanent landscape and visual effects also in these locations as well as the impact...' The HE assessment has not paid sufficient attention to the value and importance of the approaches to the conservation areas as integral parts of their settings, in particular High Ditch Road approaching</p>	<p>The Applicant notes the comment with regard to the setting of heritage assets and agrees that there will be change within the setting of heritage assets as a result of the proposed development but disagrees that the assessment has not paid sufficient attention to the value and importance of the approaches to the conservation areas. The assessment of effects of the proposed WWTP on the historic environment follows the methodology set out in S Chapter 13 Historic Environment (App Doc Ref 5.2.13) [AS-030] and 13.1 Historic Environment Baseline (App Doc Ref 5.4.13.1) [AS-039]. The effect on the Historic Environment has been professionally assessed in respect to all relevant guidance, including Historic England (2017) GPA 3 The Setting of Heritage Assets.</p> <p>Understanding of conservation areas has also been informed by the relevant Conservation Area Appraisals, where these are available. The approaches to the conservation areas are considered in this HE assessment in so far as they contribute to the character and heritage value of the conservation areas. For example, in considering Horningsea Conservation Area the importance of the approach has been considered with other aspects to determine heritage value and potential impacts. As noted in the conservation area appraisal, the route to Horningsea from the A14 provides 'something of a panorama' of the south of the village on approach but in views southward 'the A14 is dominant'. The character of the south of Horningsea Conservation Area is also focused along the high street and two ancient lanes to the Cam, with mature boundary treatments restricting outward views, as noted in</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>Fen Ditton, and Horningsea Road, north of the A14, in the case of Horningsea. The Landscape and Visual Assessment under-estimates the permanent landscape and visual effects also in these locations.</p>	<p>the Conservation Area Appraisal. These factors mean the approach makes some contribution to heritage value, but views southward are already heavily altered from the historic context. It is within this understanding that impact assessment has been undertaken, in accordance with the above methodology. It is not the purpose of the HE assessment to identify changes in views on this approach that are not in relation to the heritage value of assets.</p> <p>The Applicant notes the comments but does not agree that the landscape and visual impact assessment (LVIA) ES Chapter 15 Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034] underestimates the permanent landscape and visual effects of the roposed WWTP on the landscape and views in or around High Ditch Road, Horningsea Road, Bait's Bite Lock, Biggin Abbey and Poplar Hall. The assessment of effects of the Proposed WWTP on landscape character and visual amenity follows the methodology set out for the LVIA in ES Chapter 15 Appendix 15.5 (App Doc Ref 5.4.15.5) [APP-131]).</p> <p>The LVIA assessed the permanent landscape effects on the area which includes High Ditch Road, Horningsea Road, Bait's Bite Lock, Biggin Abbey and Poplar Hall. This area is partly in the Eastern Fen Edge Chalklands Landscape Character Area (LCA) and partly in the River Cam Corridor LCA. Fen Ditton lies in both LCA while Biggin Abbey House and Poplar Hall are in the River Cam Corridor LCA. The historic importance of the conservation areas and listed buildings in the area was taken</p>

Reference	Relevant Representation Comment	Applicant's Response
10.4	<p>The findings of the assessment are not always consistently set out through the chapter. In paras 4.2.17 and 18, the temporary potential effects during construction are reported as moderate adverse significant for Biggin Abbey, Poplar Hall and the Fen Ditton and Bait's Bite Lock CAs. Residual effects, after applying the code of Construction Practice, are noted as reduced to slight adverse for the Conservation Areas, but are still moderate adverse significant on the two listed buildings. SHH takes the view that the residual effects on the CAs should remain recorded as moderate adverse.</p>	<p>into account in the assessment of the value, susceptibility to change and sensitivity of the LCA.</p> <p>The Applicant acknowledges that these effects and the reduction by mitigation are reported and stands by this assessment but does not agree that this is inconsistent. The effect of application of mitigation, such as the Code of Construction Practice, as well as the effect of the proposed development is individually assessed for each asset in line with the methodology set out in ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) [AS-030] and 13.1 Historic Environment Baseline (App Doc Ref 5.4.13.1) [AS-039]. The reduction of effect for any mitigation method, including implementing the COCP, is dependent on how heritage value has been affected by the impact being mitigated. This varies by asset as each asset derives heritage value differently, as described in Appendix 13.2 Gazetteer of Heritage Assets, and will therefore be differently affected even by similar activities. In addition, the construction program is phased, at differing distances from assets and with different activities at some locations. Furthermore, the effect on an asset at a single location, i.e. a building, can be subject to less change from employing a CoCP construction practice than across an entire area, i.e. conservation area. Therefore, the Applicant stands by the assessment.</p>
10.4	<p>Biggin Abbey, para 4.2.6, is of 'high heritage value' and its mainly open agricultural setting is of historical relevance and this overall makes a 'positive contribution to the heritage value'. The assessment of the permanent impacts of a major industrial plant and its associated highway and</p>	<p>The Applicant notes the differing purpose of the HE and LVIA assessments, as described above. Assessment of impact to the heritage value of listed buildings and conservation areas sits within the HE assessment. Where relevant the findings of the LVIA may inform HE assessment but has not been used in</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>lighting works on the setting are set out at para 4.2.56. The residual effects are reported as permanent moderate adverse significant. Again, this assessment is flawed as it derives in part from an under-estimate in the LVA of the permanent visual effects of the PD as viewed from Biggin Abbey and as seen and experienced from within its open agricultural setting. The permanent residual effects on the Bait's Bite Lock and Horningsea CAs are reported as slight adverse. In our view, the impact and residual effects on the Fen Ditton CA, arising from the persistent visual effects within the approaches to the Conservation Area, are also slight adverse.</p>	<p>isolation to understand how the PD will affect the conservation areas. A holistic understanding of the heritage value of assets, including conservation areas, is set out in ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) [AS-030] and 13.1 Historic Environment Baseline (App Doc Ref 5.4.13.1) [AS-039].</p> <p>The Applicant notes the differing purpose of the HE and LVIA assessments, as described above. Assessment of impact to the heritage value of listed buildings and conservation areas sits within the HE assessment. Where relevant the findings of the LVIA may inform HE assessment but has not been used in isolation to understand how the PD will affect the conservation areas. A holistic understanding of the heritage value of assets, including conservation areas, is set out in ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) [AS-030] and 13.1 Historic Environment Baseline (App Doc Ref 5.4.13.1) [AS-039].</p> <p>The impact and effect on each asset, including each conservation area, has been individually assessed in accordance with the methodology set out in ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) [AS-030]. Approaches to conservation areas have been considered as part of their settings, with regard to how these contribute to the heritage value of the conservation area in question. A change to the approach of a conservation area is only relevant to impact to a conservation area where that change alters any contribution made to the heritage value by this aspect of the setting. As noted in the Conservation Area Appraisal for Fen Ditton, the</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>setting to the north is both altered from its historic character by the presence of the A14 and mostly screened from the road itself by the A14. The A14 also creates severance in the landscape, limiting the contribution to heritage value made by aspects of the setting north of the road. These factors are among the considerations in determining the permanent residual effect on Fen Ditton. The Applicant stands by the assessment that this impact does not amount to a slight adverse effect.</p> <p>Please also see the above response to item 10.4.</p>
10.4	<p>Harm to heritage The assessment of harm in Section 5.6 of AW 5.2.13 is rather peculiar in that it seeks to assess harm to the designated assets grouped or averaged together, adopting an entirely opaque methodology. In our view, the rating of harm should focus on the asset or assets most likely to be harmed and the extent of that harm. In this case, the effects on the setting of Biggin Abbey may be just 'less than substantial', but certainly are at the higher end of that range. Each of the other assets affected should be addressed separately in the same way.</p>	<p>The Applicant notes the comments but confirms that the assessment of harm has been determined in accordance with all available relevant guidance, as set out in Chapter 13, and the NPSWW (2012) and NPPF (2023).</p> <p>The Applicant wishes to clarify the approach to assessing harm to assets. Assets have not been averaged, but an individual assessment of harm has been undertaken for each asset. The overall harm score was based on the highest level of harm to a heritage asset, in this instance Biggin Abbey.</p> <p>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 and a balanced judgement will be required having regard to the scale of any harm, when determining the application. Case law (particularly James Hall v The City of Bradford (2019)) has indicated that there is a spectrum of harm (for less than</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>substantial harm) and that even negligible impacts still cause less than substantial harm. However, even though there is a spectrum 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. For Biggin Abbey the applicant has weighted the impact of the proposed development on the value of the asset, including the importance that the setting of the asset adds to the asset's significance. As discussed in Volume 4 Chapter 13 and 13.1 Historic Environment Baseline, the agricultural setting of Biggin Abbey does add to the value of the asset. However, the visual and noise presence of the A14 within the setting of the asset does also degrade and take away from assets original character. Therefore, the identified permanent construction effects and operation effects have been identified as causing harm, but have been determined as being at the lower end of the spectrum of less than substantial harm.</p>
10.5	<p>Concerns and evidence have previously been expressed in the SHH Phase 3 Consultation Response about both (i) the impact of the PD including the landscape proposals on the distinctive character of the very open local landscape and (ii) the extent to which the proposed landscape planting will screen views successfully, given the dependence on planting on top of a narrow circular earthwork and the generally poor rate of tree growth that has occurred where planting has taken place on similar chalkland locations close to the site. SHH remain concerned about the design of the circular earthwork, the height of which must be no less than 5m AGL and have exactly defined parameters in the</p>	<p>The Applicant acknowledges the comments and considers that the planting proposals set out in the Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [AS-066] are appropriate and would, together with the earth bank, filter and screen views of the proposed WWTP from the majority of views at year 15. Please see the above response to item 8.5 in response to SHH's concerns about the detailed design of the proposed development.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>draft DCO. SHH has concerns that there are still inadequate provisions in the LERMP to ensure that the tree and hedge planting grows sufficiently rapidly and is maintained successfully</p>	
<p>10.5</p>	<p>The LVA has acknowledged these concerns, to some degree, in the assumptions set out on Table 2-6 on page 39 (AW 5.2.15), where tree heights at Year 15 are now assumed to be no more than 7.5m, with the added caveat that 'seasonal drought...may result in poor establishment and lower growth rates'.</p> <p>It is also noted that there is no impact assessment for any period after Year 15 and no attempt is made to argue that, in the longer term, the 'maximum impacts on landscape and visual amenity' recorded at Year 15, will be reduced. In SHH's view, illustrative sections in the LERMP (AW 5.4.8.14 Figure 3.5, for example) are misleading in both showing greater heights of trees on the top of the earthwork, but also an unlikely density of screening from what is effectively a single hedge and tree line. The LVA refers to photomontages to illustrate screening effects of the landscape proposals and planting scheme and typically refers to the buildings being less prominent at Year 15 with partially filtered views. Photomontages are not reliable as direct illustrations of views: a wide-angle landscape view always appears more distant and buildings less prominent than to the naked eye, addressed to an extent in the narrower views presented.</p>	<p>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 during the during the first four 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.</p> <p>In relation to Figure 3.5 within the LERMP (App Doc Ref 5.4.8.14) [AS-066] the Applicant notes that these are indicated as being illustrative, and that the assessment presented in Chapter 15 (App Doc Ref 5.2.15) [AS-035] refers to the photomontages to facilitate assessments.</p> <p>The assessment presented in Chapter 15 (App Doc Ref 5.2.15) [AS-035] is in accordance with the Scoping Report (App Doc Ref 5.4.4.2) [APP-080] and Scoping Opinion (App Doc Ref 5.4.4.1) [APP-079] in that Guidelines for Landscape and Visual Impact Assessment ('GLVIA3') have been followed and an assessment presented for year 1 and year 15.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>GLVIA3 set out in Paragraph 4.31, 'Where planting is intended to provide a visual screen for the development it may be appropriate to assess the effects for different seasons and periods of time (for example, at year 0, representing the start of the operational stage, year 5 and year 15) in order to demonstrate the contribution to reducing the adverse effects of the scheme at different stages'.</p> <p>The photomontages (App Rep Doc 5.4.15.1) [APP-127] assumed the following planting sizes based on the plant size at the time of planting and potential growth rates planting.</p> <ul style="list-style-type: none"> • In year 1, mitigation planting is shown at planting size. • In year 15, mitigation planting is shown between 5 – 7.5m high for woodland, 7.5 – 10m high for trees and 2 – 3m high for hedgerows. <p>Heights vary depending on the location of planting. Semi-mature trees (5m or taller at the time of planting) and extra heavy standard trees (4.5 – 6.00m high at the time of planting) were assumed to have reached 10m high after 15 years. The planting sizes are given on Figure 3.9 Proposed Habitat Areas in the LERMP (App Doc Ref 5.4.8.14) [AS-066].</p> <p>The verifiable photomontages were prepared following the Landscape Institute's Technical Guidance Note 06/19: Visual Representation of Development Proposals. This document aims to help landscape professionals produce visualisations</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>appropriate to the circumstances in which they will be used (Paragraph 1.2.13 of the Guidance Note 06/19). Wide-angle photography has not been used. In Appendix 15.1: Photomontages, (App Rep Doc 5.4.15.1) [APP-127], the photomontages are accompanied by a note to indicate the size that they should be viewed. Photomontages with a 90 horizontal degree field of view should be viewed at A1 paper size and those with 39.6 degree horizontal degree field of view should be viewed at A3 paper size. If viewed at the correct paper size, the scale of the image in the photomontage will be similar to the scale of the proposed structures in reality. However, as the Landscape Institute Guidance Note 06/19 points out: Two dimensional visualisations, however detailed and sophisticated, can never fully substitute what people see in reality. They should, therefore, be considered an approximation of the three-dimensional visual experience that an observer might receive in the field.</p>
10.5	<p>Effects on Landscape Character The conclusions from the Landscape and Visual Amenity assessment (LVA) are that, during construction, there will be a large adverse (significant) effect on the character of the principal Eastern Fen Edge LCA. During operation, at Year 1, the effects are reported as moderate adverse (significant), which is maintained at Year 15, even with the benefit of mitigation planting. (AW 5.2.15 Table 4-1 and 4-5) The LVA correctly notes that the higher structures of the plant, seen together, will remain exposed and apparent in the landscape from most directions. The impact of the</p>	<p>The LVIA (App Doc Ref 5.2.15) [AS-034 and AS-035] identified local landscape character areas (broadly homogenous units of distinct features and elements) within the study area for the assessment. The areas were established based on published landscape character assessments, including the Greater Cambridge Landscape Character Assessment (Chris Blandford Associates, 2021) and the 2015 Inner Green Belt Study (LDA Design, 2015), desk study and site survey.</p> <p>The 2015 Inner Green Belt Study scope was to understand, <i>'how the land in the Cambridge Green Belt performs against the purposes of the Cambridge Green Belt'</i>. The study defined</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>large-scale industrial infrastructure in the predominantly rural landscape is captured in the assessment of permanent impact on the LCA, including exposed structures above mitigation planting. The upper parts of the digester towers and other tall structures including the biogas holder, boiler building, boiler stack and workshops are identified as remaining apparent, especially in the landscape to the south.</p> <p>The LVA only chose to use the large Eastern Fen Edge LCA, as defined in the 2021 Chris Blandford Associates LCA study (Ref 7). The 2015 Inner Green Belt Study (Ref 8) defined a similar Fenland Chalk Edge LCA, but then sub-divided this into three distinctly different smaller areas; the site and adjoining Green Belt lie within the Fen Ditton Fen Edge Chalklands LCA. This area, between Fen Ditton and Horningsea, has almost no woodland belts or copses. It is misleading that the LVA, (AW 5.2.15) notes there are 'similar woodland belts in the LCA and adjacent LCA, Waterbeach-Lode'. These are references mainly to the plantings around Anglesey Abbey and around Quy Hall and to denser tree and woodland cover to the north of Horningsea and along the river, towards Clayhithe and Waterbeach.</p>	<p>Assessment Sectors and sub areas. Paragraph 3.2.5 sets out that, <i>'the definition of the sectors on a simple spatial basis....does not reflect variations in land use, character or context, which occur in the majority of these sectors. Most sectors were therefore divided into sub areas ...'</i> As such, although the Green Belt study provides useful background information, the definition of the sectors and study areas were not felt relevant to the LCA used in the LVIA. The more recent Greater Cambridge Landscape Character Assessment was therefore used as the basis of the landscape baseline in the LVIA (App Doc Ref 5.2.15) [AS-034 and AS-035].</p> <p>The presence of woodland belts are noted in the description of key characteristics of the Fen Ditton Fen Edge Chalklands Landscape Character Area (LCA) (Greater Cambridge Landscape Character Assessment (Chris Blandford Associates, 2021)) and the Eastern Fen Edge Chalklands Landscape Character Area (as used in the LVIA) are similar. The Fen Ditton Fen Edge Chalklands LCA is characterised by: <i>'Irregular pattern of large, rectilinear fields contrasts with small scale, more regular field patterns around settlement edges; well-trimmed hedges, boundary trees and shelterbelts provide a distinctive localised vegetation pattern near villages'</i>. The LVIA baseline description of the Eastern Fen Edge Chalklands LCA is broadly similar. The opening sentence describes it as follows: <i>'An open landscape of low-lying farmland separated by drainage ditches, hawthorn hedges, tree-lined farm tracks and woodland belts'</i>.</p> <p>The LVIA does not play down the openness of the landscape and it is agreed that the more substantial existing tree belts in</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>the Eastern Fen Edge Chalklands LCA are nearer Stow cum Quy, but there are belts of vegetation, including woodland edge and tree species, along field boundaries, the disused railway line, the A14 and parts of Low Fen Drove Way.</p> <p>The proposed WWTP proposals include increasing the level of woodland cover in the LCA but after consultation with Greater Cambridge Shared Planning Service on 13 December 2021, the landscape masterplan was modified to reduce the scale of woodland blocks, breaking them up with open glades and meadow.</p>
10.5	<p>The LVA does acknowledge that the woodland belts designed to screen the plant will substantially change the character of the area between Fen Ditton and Horningsea, 'making it wooded and less open', but appears to underplay the importance of this marked change to landscape character. In SHH's submission, the impact of the PD on landscape character should be considered large adverse (significant) at Year 1 and will remain at least moderate adverse (significant) at Year 15 and thereafter, as a permanent effect.</p>	<p>The Landscape Masterplan LERMP (App Doc Ref 5.4.8.14) [AS-066] aims to create a balance between screening the Proposed WWTP from view and maintaining some open views south, across the landscape. The changes will affect a relatively small part of the LCA because existing vegetation along Low Fen Drove Way, the A14, the disused railway line and around Cambridge, Quy, Horningsea and the landscape to the north-east will screen much of the proposed WWTP from the wider landscape. The Applicant considers the assessment of the impact of the proposed development on the landscape character is appropriate.</p>
10.5	<p>Effects on Visual Amenity</p> <p>The assessment of visual effects during construction set out in AW 5.2.15 is reasonable. SHH consider there has been, generally, an under-estimation of the permanent adverse effects that the PD will have on the visual amenity of a significant number of receptors within 1km of the main site</p>	<p>The Applicant notes the comments.</p> <p>The Applicant does not agree that there is an underestimation of the permanent effects on visual amenity reported in the LVIA. The assessment follows the LVIA methodology (App Doc Ref 5.4.15.5) [APP-131] based on Guidelines for Landscape and visual impact assessment 2013 (GLVIA3). The assessment has</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>as assessed at Year 15. This arises mainly from an over-optimistic assessment of the screening effect that the landscape planting will achieve by Year 15. Such an assessment should, in any case, have been focused on the winter views and take proper account of the extent to which the deciduous tree screening can reasonably be assumed to have matured. It would have been helpful if the submission had included additional photomontages for viewpoints in Fen Ditton (RVs 7 and 11) and that the photomontage at RV 10 (PM 1) should have been properly based on the ground level of adjacent houses on the north side of High Ditch Road, rather than at road level.</p>	<p>used a winter and summer visual baseline to inform the assessment and following GLVIA3 as set out in Paragraph 6.28, <i>'...Assessments may need to be provided for both the winter season, with least leaf cover and therefore minimum screening, and for fuller screening in summer conditions. Discussion with the competent authority will help to determine whether the emphasis should be on the maximum visibility scenario of the winter condition of vegetation, or whether both summer and winter conditions should be used.</i> The assessment has considered winter conditions to show the proposed WWTP at its most visible. The verifiable photomontages, (App Doc Ref 5.4.15.1) [APP-127], were prepared to compare the existing view with views of the Proposed Development in winter of year 1 of operation and the winter of year 15. Photographs illustrating the existing view from the representative viewpoints in both winter and summer are provided in the LVIA appendix 15.2 (App Doc Ref 5.4.15.2)[AS-099]</p> <p>An assumption has to be made for the preparation of photomontages about the growth rates of trees and hedgerows. These will vary according to species planted and growing conditions. The tree species specified on the landscape masterplan includes a variety of fast and slower growing species. For the photomontages (App Doc Ref 5.4.15.1) [APP-127], the following planting sizes, based on the plant size at the time of planting and potential growth rates, were assumed: In year 1, mitigation planting is shown at planting size. In year 15, mitigation planting is shown between 5 - 7.5m high for woodland, 7.5 - 10m high for trees and 2 - 3m high for</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>hedgerows. Heights vary depending on the location of planting. Semi-mature trees (5m or taller at the time of planting) and extra heavy standard trees (4.5 – 6.00m high at the time of planting) were assumed to have reached 10m high after 15 years. The planting sizes are given on Figure 3.9 Proposed Habitat Areas in the LERMP (App Doc Ref 5.4.8.14) [AS-066].</p> <p>The locations for the photomontages were selected in consultation with Greater Cambridge Shared Planning Service, Historic England, the National Trust and Cambridge Past Present and Future in a meeting of the Technical Working Group for landscape and historic environment on 7 December 2021.</p>
10.5	<p>SHH will provide further evidence that from viewpoints where large adverse (significant) effects are noted at Year 1 (RVs 17, 18 and 25), that at 18 in particular will not have diminished to moderate adverse by Year 15. In the case of impacts recorded as moderate adverse (significant) at Year 1, these will generally not have reduced to slight adverse by Year 15. This applies to viewpoints RV 10 and RV 11, that represent housing on the north side of High Ditch Road in Fen Ditton and the north end of the village on Horningsea Road; the views from Biggin Abbey, RV24; and from RVs 13, 23, 24 and 26. These should all be recorded as moderate adverse (significant) at Year 15. These are long term and permanent effects. Impacts on viewpoints further east along High Ditch Road and Low Fen Drove Way bridge for residents, pedestrians, and road users (RVs 7 and 9) have been under-estimated at Year 1, and probably at Year 15, and should be recorded as moderate adverse (significant).</p>	<p>The Applicant acknowledges the comments and the intention for submission of further evidence.</p>

Reference	Relevant Representation Comment	Applicant's Response
10.5	<p>In selecting the application site and in scheme development, the Applicant acknowledges the open landscape nature of this site and the significant adverse landscape and visual impacts that any scheme would have. See, for example, the AW Stage 4 Final Site Selection Report Appendix B at B.2.49 and B.2.51. SHH does agree with the ES LVA conclusion that there will be moderate adverse significant permanent impacts on landscape character. The impacts on visual amenity, where these are reported as large adverse or moderate adverse at Year 1 in the LVA, will not in our view diminish to slight adverse in most locations at Year 15. These effects at Year 15 are being accepted by the Applicant as being long term and, in effect, permanent. There are several locations where additional off-site planting should be provided, as set out in Section 13.3, which will help reduce adverse visual effects, noting that these will make further changes to a wide open landscape.</p>	<p>The Applicant acknowledges the comments and the Applicant considers that the planting proposals, together with the earth bank, set out in application document Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [AS-066] are appropriate and would effectively filter and screen views of the proposed WWTP from the majority of views at year 15.</p>
10.5	<p>Concerns and evidence have previously been expressed in the SHH Phase 3 Consultation Response about both (i) the impact of the PD including the landscape proposals on the distinctive character of the very open local landscape and (ii) the extent to which the proposed landscape planting will screen views successfully, given the dependence on planting on top of a narrow circular earthwork and the generally poor rate of tree growth that has occurred where planting has taken place on similar chalkland locations close to the site. SHH remain concerned about the design of the circular earthwork, the</p>	<p>The Applicant acknowledges the comments and the Applicant considers that the planting proposals set out in application document 5.4.8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [AS-066] are appropriate and together with the earth bank would filter and screen views of the proposed WWTP from the majority of views at year 15. 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 bank surrounding the Proposed WWTP to aid establishment and growth. This includes weed control, irrigation and pruning during the during the first four growing</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>height of which must be no less than 5m AGL and have exactly defined parameters in the draft DCO.</p> <p>SHH has concerns that there are still inadequate provisions in the LERMP to ensure that the tree and hedge planting grows sufficiently rapidly and is maintained successfully. The LVA has acknowledged these concerns, to some degree, in the assumptions set out on Table 2-6 on page 39 (AW 5.2.15), where tree heights at Year 15 are now assumed to be no more than 7.5m, with the added caveat that 'seasonal drought...may result in poor establishment and lower growth rates'. It is also noted that there is no impact assessment for any period after Year 15 and no attempt is made to argue that, in the longer term, the 'maximum impacts on landscape and visual amenity' recorded at Year 15, will be reduced. In SHH's view, illustrative sections in the LERMP (AW 5.4.8.14 Figure 3.5, for example) are misleading in both showing greater heights of trees on the top of the earthwork, but also an unlikely density of screening from what is effectively a single hedge and tree line.</p>	<p>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. Additional comments are set out in 8.5 above.</p>
	<p>The LVA refers to photomontages to illustrate screening effects of the landscape proposals and planting scheme and typically refers to the buildings being less prominent at Year 15 with partially filtered views. Photomontages are not reliable as direct illustrations of views: a wide-angle landscape view always appears more distant and buildings less prominent than to the naked eye, addressed to an extent in the narrower views presented.</p>	<p>The verifiable photomontages (App Doc Ref 5.4.15.1) [APP-127] were prepared following the Landscape Institute's Technical Guidance Note 06/19: Visual Representation of Development Proposals. This document aims to help landscape professionals produce visualisations appropriate to the circumstances in which they will be used (paragraph 1.2.13).</p> <p>The photomontages are accompanied by a note to say at what size they should be viewed. Photomontages with a 90</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>horizontal degree field of view should be viewed at A1 paper size and those with 39.6 degree horizontal degree field of view should be viewed at A3 paper size. If viewed at the correct paper size, the scale of the image in the photomontage will be similar to the scale of the proposed structures in reality. However, as the Landscape Institute guidance points out: Two dimensional visualisations, however detailed and sophisticated, can never fully substitute what people see in reality. They should, therefore, be considered an approximation of the three-dimensional visual experience that an observer might receive in the field.</p>
10.5	<p>The LVA only chose to use the large Eastern Fen Edge LCA, as defined in the 2021 Chris Blandford Associates LCA study (Ref 7). The 2015 Inner Green Belt Study (Ref 8) defined a similar Fenland Chalk Edge LCA, but then sub-divided this into three distinctly different smaller areas; the site and adjoining Green Belt lie within the Fen Ditton Fen Edge Chalklands LCA. This area, between Fen Ditton and Horningsea, has almost no woodland belts or copses. It is misleading that the LVA, (AW 5.2.15) notes there are 'similar woodland belts in the LCA and adjacent LCA, Waterbeach-Lode'. These are references mainly to the plantings around Anglesey Abbey and around Quy Hall and to denser tree and woodland cover to the north of Horningsea and along the river, towards Clayhithe and Waterbeach.</p>	<p>The LVIA within the ES Chapter 15 (App Doc Ref 5.2.15) [AS-034 and AS-035] identified local landscape character areas (broadly homogenous units of distinct features and elements) within the study area for the assessment. The areas were established based on published landscape character assessments, including the Greater Cambridge Landscape Character Assessment (Chris Blandford Associates, 2021) and the 2015 Inner Green Belt Study (LDA Design, 2015), desk study and site survey.</p> <p>The 2015 Inner Green Belt Study scope was to understand, 'how the land in the Cambridge Green Belt performs against the purposes of the Cambridge Green Belt'. The study defined Assessment Sectors and sub areas. Paragraph 3.2.5 sets out that, 'the definition of the sectors on a simple spatial basis....does not reflect variations in land use, character or context, which occur in the majority of these sectors. Most sectors were therefore divided into sub areas ...' As such, although the Green Belt study provides useful background</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>information, the definition of the sectors and study areas were not felt relevant to the LCA used in the LVIA. The more recent Greater Cambridge Landscape Character Assessment was therefore used as the basis of the landscape baseline in the LVIA within the ES Chapter 15 (App Doc Ref 5.2.15) [AS-034 and AS-035] identified.</p> <p>The description of key characteristics of the Fen Ditton Fen Edge Chalklands LCA and the Eastern Fen Edge Chalklands Landscape Character Area (as used in the LVIA) are similar. The Fen Ditton Fen Edge Chalklands LCA is characterised by: <i>'Irregular pattern of large, rectilinear fields contrasts with small scale, more regular field patterns around settlement edges; well-trimmed hedges, boundary trees and shelterbelts provide a distinctive localised vegetation pattern near villages'</i>.</p> <p>The LVIA baseline description of the Eastern Fen Edge Chalklands LCA is more detailed but broadly similar. The opening sentence describes it as follows: <i>'An open landscape of low-lying farmland separated by drainage ditches, hawthorn hedges, tree-lined farm tracks and woodland belts'</i>.</p> <p>The LVIA within the ES Chapter 15 (App Doc Ref 5.2.15) [AS-034 and AS-035] does not play down the openness of the landscape and it is agreed that the more substantial tree belts in the Eastern Fen Edge Chalklands LCA are nearer Stow cum Quy, but there are belts of vegetation, including woodland edge and tree species, in the LCA along field boundaries, the disused railway line, the A14 and parts of Low Fen Drove Way.</p>

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10.5	<p>The LVA only chose to use the large Eastern Fen Edge LCA, as defined in the 2021 Chris Blandford Associates LCA study (Ref 7). The 2015 Inner Green Belt Study (Ref 8) defined a similar Fenland Chalk Edge LCA, but then sub-divided this into three distinctly different smaller areas; the site and adjoining Green Belt lie within the Fen Ditton Fen Edge Chalklands LCA. This area, between Fen Ditton and Horningsea, has almost no woodland belts or copses. It is misleading that the LVA, (AW 5.2.15) notes there are 'similar woodland belts in the LCA and adjacent LCA, Waterbeach-Lode'. These are references mainly to the plantings around Anglesey Abbey and around Quy Hall and to denser tree and woodland cover to the north of Horningsea and along the river, towards Clayhithe and Waterbeach.</p>	<p>The LVIA within the ES Chapter 15 (App Doc Ref 5.2.15) [AS-034 and AS-035] identified local landscape character areas (broadly homogenous units of distinct features and elements) within the study area for the assessment. The areas were established based on published landscape character assessments, including the Greater Cambridge Landscape Character Assessment (Chris Blandford Associates, 2021) and the 2015 Inner Green Belt Study (LDA Design 2015), desk study and site survey.</p> <p>The 2015 Inner Green Belt Study scope was to understand, 'how the land in the Cambridge Green Belt performs against the purposes of the Cambridge Green Belt'. The study defined Assessment Sectors and sub areas. Paragraph 3.2.5 sets out that, 'the definition of the sectors on a simple spatial basis....does not reflect variations in land use, character or context, which occur in the majority of these sectors. Most sectors were therefore divided into sub areas ...' As such, although the Green Belt study provides useful background information, the definition of the sectors and study areas were not felt relevant to the LCA used in the LVIA. The more recent Greater Cambridge Landscape Character Assessment was therefore used as the basis of the landscape baseline in the LVIA (App Doc Ref 5.2.15) [AS-034 and AS-035].</p> <p>The description of key characteristics of the Fen Ditton Fen Edge Chalklands LCA and the Eastern Fen Edge Chalklands Landscape Character Area (as used in the LVIA) are similar. The Fen Ditton Fen Edge Chalklands LCA is characterised by: <i>'Irregular pattern of large, rectilinear fields contrasts with small scale, more regular field patterns around settlement edges; well-trimmed</i></p>

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		<p><i>hedges, boundary trees and shelterbelts provide a distinctive localised vegetation pattern near villages'.</i></p> <p>The LVIA baseline description of the Eastern Fen Edge Chalklands LCA is more detailed but broadly similar. The opening sentence describes it as follows: <i>'An open landscape of low-lying farmland separated by drainage ditches, hawthorn hedges, tree-lined farm tracks and woodland belts'.</i></p> <p>The LVIA does not play down the openness of the landscape and it is agreed that the more substantial tree belts in the Eastern Fen Edge Chalklands LCA are nearer Stow cum Quy, but there are belts of vegetation in the LCA including woodland edge and tree species, along field boundaries, the disused railway line, the A14 and parts of Low Fen Drove Way.</p>
10.5	<p>The LVA does acknowledge that the woodland belts designed to screen the plant will substantially change the character of the area between Fen Ditton and Horningsea, 'making it wooded and less open', but appears to underplay the importance of this marked change to landscape character. In SHH's submission, the impact of the PD on landscape character should be considered large adverse (significant) at Year 1 and will remain at least moderate adverse (significant) at Year 15 and thereafter, as a permanent effect</p> <p>In selecting the application site and in scheme development, the Applicant acknowledges the open landscape nature of this site and the significant adverse</p>	<p>The Applicant notes the comments.</p> <p>The LVIA methodology (App Doc Ref 5.4.15.5) [APP-131] sets out the method for the evaluation of effects. The overall significance of effects was determined by weighing the sensitivity of the receptor against the magnitude of change to landscape or visual amenity resulting from the construction or operation of the proposed WWTP.</p> <p>The LVIA within the ES Chapter 15 (App Doc Ref 5.2.15) [AS-034 and AS-035] reports a moderate adverse effect in year 1 of operation on the Eastern Fen Edge Chalklands LCA due to the introduction of new large-scale infrastructure into a predominantly open rural landscape. However, much of the Proposed WWTP will be screened by the earth bank and the</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>landscape and visual impacts that any scheme would have. See, for example, the AW Stage 4 Final Site Selection Report Appendix B at B.2.49 and B.2.51. SHH does agree with the ES LVA conclusion that there will be moderate adverse significant permanent impacts on landscape character. The impacts on visual amenity, where these are reported as large adverse or moderate adverse at Year 1 in the LVA, will not in our view diminish to slight adverse in most locations at Year 15. These effects at Year 15 are being accepted by the Applicant as being long term and, in effect, permanent. There are several locations where additional off-site planting should be provided, as set out in Section 13.3, which will help reduce adverse visual effects, noting that these will make further changes to a wide open landscape.</p>	<p>existing vegetation along field boundaries, the disused railway line, the A14 and parts of Low Fen Drove Way, containing landscape effects to the immediate surroundings of the area. By year 15, the maturing mitigation planting will screen the Proposed WWTP further but will change the character of the landscape around the Proposed WWTP more wooded and less open. Consequently, the LVIA reports that effects will remain moderate adverse.</p> <p>The Applicant considers that the planting proposals set out in application document Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [AS-066] are appropriate and would, together with the earth bank, filter and screen views of the proposed WWTP from the majority of views at year 15. The majority of receptors' views of the proposed WWTP, as informed by the photomontages (App Doc Ref 5.4.15.1) [APP-127], will be fully screened or filtered by maturing mitigation planting by year 15. The exception is from the elevated viewpoint on the bridge over the A14 (VP 18) in which the Proposed WWTP will remain clearly visible in fleeting views.</p> <p>With regards the proposal for additional planting, the Applicant considers that the proposals set out in application document 5.4.8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [AS-066] are appropriate.</p>
10.6	Odour	The Applicant acknowledges SHH's concerns regarding odour and confirms that modelling information in the ES Chapter 18

Reference	Relevant Representation Comment	Applicant's Response
	<p>Odour Impacts from PD The commissioning phase of a new works poses particular odour risks (Ref 16). Affected Receptors The proposed relocation will transfer odour impacts to hitherto unaffected receptors. SHH questions the accuracy of modelling which has not identified areas where intermittent nuisance will be introduced, e.g., southern edge of Horningsea village and the housing and school on Horningsea Road, Fen Ditton.</p>	<p>Odour (App Doc Ref 5.2.18) [APP-050] shows a negligible level of odour at the proposed facility. The Applicant confirms that there has been further design development to mitigate odour, including there now being only one filtered vent shaft. Further modelling information is also available in ES Chapter 18 Odour (App Doc Ref 5.2.18) [APP-050]. In line with the Institute of Air Quality Management (IAQM) guidance the odour modelling has been assessed on the worst year out of the 5, not averaged over the 5-year period. The Applicant considers the modelling to be appropriate, as in line with the Institute of Air Quality Management guidance on the assessment of odour for planning.</p>
10.6	<p>Anglian Water aims to achieve a 'negligible' effect on all known receptors beyond 600m. The threshold for 'Negligible' effect follows the Institute of Air Quality Management (IAQM) value for odour units but is defined as 98% compliance under normal operations. This therefore allows exceedances for 7 days/year and would not cover infrequent, foreseeable events such as rare storms or low frequency operation and maintenance activities such as internal structure inspections or even problems due to emergency/out of design conditions. Anglian Water should be directed to assess the impact of potential exceedances and commit to preventing odour nuisance at residences.</p>	<p>The Applicant notes the comments. The Applicant has undertaken its assessment of odour impacts In line with the Institute of Air Quality Management (IAQM) guidance as set out within the Scoping Report (App Doc Ref 5.4.4.2) [APP-080]. The Applicant considers the assessment to be appropriate.</p>
10.6	<p>The effects of rising temperatures and lower rainfall due to climate change on odour generation have not been</p>	<p>The Applicant acknowledges the comments but refers mitigation proposed. The terminal pumping station and inlet</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>addressed. There is little information about the conditions over which the primary mitigation is expected to be sufficient; the proposed secondary mitigation relies on odour nuisance occurring before it will be upgraded.</p>	<p>works will be covered and air extracted and treated (odour controlled), to enable the risks of changes in influent characteristics due to lower rainfall, raising temperatures, etc. to be easily managed.</p> <p>Post these processes, the higher incoming water temperatures will result in better waste water treatment performance (treatment bacteria work faster at higher temperatures).</p> <p>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.</p> <p>Two degrees 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 processes, etc.</p> <p>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]</p>

Reference	Relevant Representation Comment	Applicant's Response
10.6	<p>AW's proposed approach is to control the source term at the works through process design and odour management. Supporting material (Ref 17) to the Technical Interpretation of the Odour Assessment Report suggests the main sources contributing odour at the existing works are the inlet works (18%), primary settlement tanks (10%), secondary treatment activated sludge plant – anoxic zones (18.8%) and raw sludge gravity belt thickener vent (26.1%). This assessment took into account Odournet's 2017 measurement survey. Storm tanks and the storm lagoon were given a low contribution factor, partly due to their infrequent use.</p>	<p>The Applicant notes the comments. The Applicant has undertaken its assessment of odour impacts in line with the Institute of Air Quality Management (IAQM) guidance as set out within the Scoping Report (App Doc Ref 5.4.4.2) [APP-080]. The Applicant considers the assessment to be appropriate.</p>
10.6	<p>Anglian Water's assessment of Climate Change, ES Chapter 9, refers to a 2019 survey as being in a year of above average temperatures and for which odour data is available and was used in the odour model. Para 4.3.69 states that 'Chapter 18: Odour notes that climate change is not expected to alter future baseline odour emissions'. This phrase is used in para 2.2.23 of Chapter 18 and obviously contradicts its preceding para 2.2.18 where adverse changes due to higher temperatures and lower rainfall are discussed. Maximum temperatures in Cambridge of 38.7 deg. C on 25 July 2019 and 39.9 deg. C on 20 July 2022 were reported. Table 2.7 gives the maximum temperature for assessment as 47.2 deg. C based on climate projection to the late 2090s. The proposed approach to secondary mitigation for avoiding odour nuisance is to amend or upgrade odour controls as and when required by environmental permits. Anglian Water should state the</p>	<p>We consider the information presented and utilised as part of the baseline odour assessment to be sufficient and in accordance with the Institute of Air Quality Management's (IAQM) Guidance on the assessment of odour for planning Version 1.1. – July 2018.</p> <p>The following provides further details to highlight that the odour emission rates represent a longer period of time.</p> <ul style="list-style-type: none"> • 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 the odour assessment "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

Reference	Relevant Representation Comment	Applicant's Response
	<p>maximum temperature to be used in the design of the primary mitigation i.e. the initial build and confirm that this is not 38.7 deg. C. AW should also present evidence that primary mitigation can achieve the levels of source control envisaged. There appears to be potential for AW to under-invest in odour control in the initial build and rely on future upgrades to cope with climate change.</p>	<p>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)."</p> <ul style="list-style-type: none"> • The odour assessment report section 4.6 provide further details about the emission rates, including an explanation detailing the longer period (2015 to 2019) data that was utilised for the study, resulting in the decision to utilise the 2019 study's emission survey's compilation of suitable emission value results (not exclusively 2019 survey's measured values): "To avoid the requirement for further validation of emission rates, the Ove Arup & Partners Ltd (hereafter Arup) odour impact assessment report for Brookgate Ltd associated with the Cambridge North development, 18 September 2019, compilation and validation of emission value results were used where possible. They conducted a review and comparison of 3 separate odour emission surveys carried out at the existing Cambridge WRC between 2015 and 2019 to create an input set for their modelling study, namely:" - H&M Environmental Ltd odour emissions survey in November 2015 - Odournet odour emissions survey in August 2017 - Silsoe Odours odour emissions survey in July 2019 <p>The terminal pumping station and inlet works will be covered and air extracted and treated (odour controlled), to enable the</p>

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		<p>risks of changes in influent characteristics due to lower rainfall, raising temperatures, etc. to be easily managed.</p> <p>Post these processes, the higher incoming water temperatures will result in better waste water treatment performance (treatment bacteria work faster at higher temperatures).</p> <p>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.</p> <p>Two degrees 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 processes, etc.</p> <p>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).</p>
10.6	<p>Affected Receptors The proposed relocation will transfer odour impacts to hitherto unaffected receptors. SHH questions the accuracy of modelling which has not identified areas where nuisance</p>	<p>The Applicant has undertaken its assessment of odour impacts in line with the Institute of Air Quality Management (IAQM) guidance.</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>will be introduced, e.g., southern edge of Horningsea village, northern section of housing on Horningsea Road, Fen Ditton and access to Fen Ditton Primary School</p>	<p>It is impossible to name every receptor. As such, those closest to the site is named as the impact to those will be the most severe. Receptors closer to those mentioned in this question were named. It can be confirmed that as the roads mentioned are classified as 'low' sensitivity, compared with e.g. the Fen Ditton Primary School which was named and which is classified as 'high' sensitivity, the result would remain "negligible impact".</p>
<p>10.6</p>	<p>Visitors' sense of odour at a site visit July 2022 were compared with AW's portable H2S gas detection meter. The extra odour due to discharge of sewage (not sludge) tankers and the uncovered primary tanks was notable. There was no odour noticed at around 50m from the sludge processing plant, closer inspection of this element of the works was not possible due to hazard restrictions. No reports have been identified about the potential to reduce odour pollution from the existing works. The proposed relocation will transfer odour impacts to hitherto unaffected receptors.</p>	<p>As described in chapter 5.6 of the odour impact assessment, 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:</p>
<p>10.6</p>	<p>Operational Concerns SHH's concerns about the proposed works also include: (i) The likelihood of higher temperatures and possible septicity leading to greater generation of odour than modelled. This would include septicity in the transfer tunnel and in the Waterbeach pipeline and would lead to odour at the ventilation shafts. Modelling at ventilation shafts has not been undertaken although suggested by GCP (Ref 18). ii) (The possibility that the commissioning phase will lead to greater generation of odour than modelled since the new bioreactors will have to 'settle down'.</p>	<p>The ventilation shafts are a design feature 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</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>duration of air released from the ventilation facility, only to acknowledge that it would be intermittent, infrequent and short-lived.</p> <p>The ventilation facility would include a carbon filter to remove odour and a vent stack extending to a height of up to 10m. 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 our OCU equipment suppliers guarantee 95% H₂S (hydrogen sulphide) removal performance of their carbon media.</p> <p>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 Low exposure risk coupled with a 'Medium' sensitivity receptor equates to a 'Negligible effect'. The odour exposure risk at all high sensitivity receptors is described as 'Negligible'.</p>

Reference	Relevant Representation Comment	Applicant's Response
		<p>"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."</p>
10.7	<p>SHH remains of the view that direct permanent access to the site should have been taken from the eastbound carriageway of the A14. This was ruled out principally on the grounds that it did not conform to Department for Transport policy without adequately exploring the advantages and disadvantages of that arrangement and whether an appropriate exception to policy could have been granted.</p>	<p>The Applicant notes the comments. The appropriate access for the new development is via junction 34 of the A14 Strategic Road Network. A new junction on the A14 to serve the proposed development was not acceptable principally on DfT policy grounds [<i>DfT Circular 01/2022 'Strategic Road network and the delivery of sustainable development'</i>] and safety concerns. This was agreed with the Relevant Highway Authorities in reviewing alternative access options.</p>
10.7	<p>The permanent site access arrangements at J34 have been designed to reflect the Applicant's commitment to help ensure that construction and operational HGVs entering and leaving the works site only do so via the A14. No construction HGVs will be permitted to pass through Horningsea or Fen Ditton. A peak hour ban on construction HGV movements is proposed.</p>	<p>The Applicant notes the comments and these are correct.</p>
10.7	<p>SHH notes that a major cumulative adverse traffic impact, which is significant, is reported during operation, as a result of right turning vehicles onto the A14 on-slip road blocking straight ahead movements and that this can only be</p>	<p>The Applicant notes the comment and would direct attention to Requirement 9 of the draft DCO that requires a Construction Traffic Management Plan, for each phase of the development,</p>

Reference	Relevant Representation Comment	Applicant's Response
	<p>mitigated by a peak hour restriction on operational vehicle movements into and out of the works. SHH may make further submissions about the scope and enforceability of those arrangements as set out in the relevant Management Plans in further submissions.</p>	<p>to be submitted and approved alongside the Construction Environmental Management Plan for that phase.</p>
<p>10.8</p>	<p>Water Resources and Quality Stormwater Capacity SHH has concerns after review of the ES and supporting technical studies, about under-design of the stormwater system which, if corrected, would reduce space provision for upgrades after Phase 2 or, if uncorrected, lead to increased risks of pollution. In summary these are:</p> <ul style="list-style-type: none"> (i) The proposed works introduces the risk of discharge to land and runoff to the Black Ditch and Quy Fen SSSI. For example, the site drainage pond is directly connected to the Black Ditch. Furthermore, planning permission for the pumping station at Waterbeach will be determined separately. A failsafe design or management plan is required and should be presented as part of the DCO application. (ii) The Applicant should state the discharge capacity of the gravity pipelines discharging to the River Cam under future, full flood submerged tailwater conditions and confirm if the, unquantified, flow from the Waterbeach PS could bypass the lift pumps in the Terminal Pumping Station. (iii) The frequency and duration of sewage overflows under future conditions should be no worse than at present, (detriment); the latter need to be 	<ul style="list-style-type: none"> i) The Applicant has prepared an Outline Water Quality Monitoring Plan which has been agreed in principle with the Environment Agency to deal with this and similar concerns. This document will be shared with other relevant stakeholders eg Natural England for their comments. An The final version will be available for Deadline 2. ii) The Applicant notes the comment. This is set out in the Fluvial Model Report at (App Doc Ref 5.4.20.5). The discharge rates are also regulated as part of the final effluent discharge permit agreed with The Environment Agency. Is it extremely unlikely the flows could bypass the pumps in the proposed Waterbeach terminal pumping station given there will be 3 pumps Duty/Standby/Assist. If there is a power failure, then the pumping station wet well has 4 hours dry weather flow storage capacity to allow the operations/maintenance to arrange tankers and respond to the issue. iii) The Applicant notes the comments. The Applicant used a calibrated sewer catchment network model to predict the storm events for various storm intensities, taking consideration of climate change impacts and define the capacity of the catchment infrastructure, including the sewer tunnel extension

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	<p>examined in detail and any improvements required under the DEFRA 2023 Plan taken into account.</p> <p>(iv) Clarification is needed as to if/how a +20% factor was included in the supporting storm model study.</p> <p>(v) Storm overflow data from 2021 and 2022 should be presented for Riverside and Cambridge CSOs</p>	<p>to the new CWWTPR. This approach and methodology was agreed with the Environment Agency.</p> <p>iv)The Applicant notes the comment and refers to point iii) above.</p> <p>v) There is one CSO in the Cambridge WWTP catchment, namely Riverside CSO Details of the overflow data are published by the Environment Agency on their website</p> <p>For ease of reference the data for 2021 and 2022 is set out below.</p> <table border="1" data-bbox="1211 678 2038 1134"> <thead> <tr> <th colspan="2" data-bbox="1211 678 2038 751">2021</th> </tr> </thead> <tbody> <tr> <td data-bbox="1211 751 1624 863">Total Duration (hrs) all spills prior to processing through 12-24h count method</td> <td data-bbox="1624 751 2038 863">Counted spills using 12-24h count method</td> </tr> <tr> <td data-bbox="1211 863 1624 906">30.20</td> <td data-bbox="1624 863 2038 906">13</td> </tr> <tr> <th colspan="2" data-bbox="1211 906 2038 979">2022</th> </tr> <tr> <td data-bbox="1211 979 1624 1091">Total Duration (hrs) all spills prior to processing through 12-24h count method</td> <td data-bbox="1624 979 2038 1091">Counted spills using 12-24h count method</td> </tr> <tr> <td data-bbox="1211 1091 1624 1134">0.73</td> <td data-bbox="1624 1091 2038 1134">2</td> </tr> </tbody> </table>	2021		Total Duration (hrs) all spills prior to processing through 12-24h count method	Counted spills using 12-24h count method	30.20	13	2022		Total Duration (hrs) all spills prior to processing through 12-24h count method	Counted spills using 12-24h count method	0.73	2
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	<p>Water Quality Water Quality Water quality arising from the proposed discharge and water quality limits are discussed in the ES Chapter 20 and supporting material. A potential reduction of 20% in the summer low flow of the River Cam upstream of Cambridge is described in relation to climate change.</p>	<p>Potential climate change impacts on low flows have not been taken into account in the assessment. This is because of uncertainties which include:</p> <ul style="list-style-type: none"> • 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 												

Reference	Relevant Representation Comment	Applicant's Response
	<p>However, the consequent reduction in dilution at the works outfall has not been carried through to any discussion or predictions of water quality in the ES or Habitats/WFD assessments. Under that scenario, substantially higher proportions of summer low flows would be effluent than at present or as assessed in the ES, with over 50% of low flow at Bottisham Lock consisting of effluent. The necessary mitigation for this needs to be presented.</p>	<p>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.</p> <p>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] paragraph 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.</p> <p>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] paragraph 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</p>

Reference	Relevant Representation Comment	Applicant's Response
		possible impacts of climate change on low flows (or future water quality in the upstream catchment).
11	Funding and Deliverability Overall Planning Balance DCO Provisions	<p>The Applicant acknowledges the comments. The following application documents cover these issues, respectively:</p> <ul style="list-style-type: none"> • 3.2 Funding Statement [APP-013] • 7.5 Planning Statement[AS-128] • 2.1 Draft Development Consent Order [AS-139] .

Get in touch

You can contact us by:



Emailing at info@cwwtpr.com



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



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