

## Comments on the Applicant's D2 Submissions

This document sets out the comments by Cambridgeshire County Council (**CCC**) on the Applicant's Deadline 1 (**D1**) submission, Applicant's Responses to the Examining Authority's Written Questions [REP1-079]. The table below provides the relevant paragraph or reference numbers.

Except where expressly stated otherwise below, the Council reiterates and relies on the comments submitted to the ExA at previous deadlines.

### 8.3 Applicant's Responses to the Examining Authority's Written Questions [REP1-079]

Topic	Question Number	Applicant's response	Councils' Comment
1. General and Cross Topic Questions	1.22	The assessment of cumulative impacts on these aspects takes into account that there would be coordination with SLC Rail and WBDC so that each party can development mitigation measures which would be incorporated in the relevant Construction Environment Management Plan (CEMP) for each project.	The Council welcomes confirmation that biodiversity mitigation measures will be co-ordinated as part of the CEMP. However, the Council seeks specific reference for co-ordination with other developments to be included within the Outline Reptile Mitigation Strategy, provided in the Outline CEMP, as set out at Council's Response to ExQA1 [REP1-129] question 5.14.
5. Biodiversity	5.5	It is incorrect that baseline habitat condition surveys were not carried out. The Applicant undertook baseline habitat surveys along Low Fen Drove Way Grassland and Hedges CWS in 2020 and completed National Vegetation Classification (NVC) surveys in July 2021. This survey effort is reported in Table 2-6 in the ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [AS-026].	The Council welcomes confirmation that baseline habitat condition and National Vegetation Classification surveys were completed for Low Fen Drove Way Grassland and Hedges County Wildlife Site. However, it is unclear why there was no assessment / discussions with the ES Chapter 8: Biodiversity [AS-027] regarding whether or not the CWS still meets county criteria. We are also concerned that the NVC survey work concluded that "the unimproved calcareous grassland that the CWS is partially designated for was not recorded during the surveys", (3.1.22, ES Chapter 8: Biodiversity [AS-026]). This is contrary to recent County

			Wildlife Site survey undertaken by the Wildlife Trust in 2023 (commissioned by Cambridgeshire County Council), which confirmed that unimproved calcareous grassland is still present within the western section of the disused railway.
5. Biodiversity	5.6	<p>In relation to the impacts of lighting, Low Fen Drove Way Grasslands and Hedges CWS is represented by receptors LR2 and LR3 in ES Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100]. Section 6.4, Table 6-1 and 6-2 of ES Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100] concludes that the residual effect to both LR2 and LR3 are none/negligible for both construction and operation respectively. The details submitted in relation to operational lighting must accord with the details set out in ES Appendix 2.5 Lighting Design Strategy (App Doc Ref 5.4.2.5) [APP-072].</p> <p>The Applicant disagrees that opportunities for enhancement of the CWS have been missed.</p>	<p>The Council welcomes the Applicant's clarification that the residual effect of lighting on the CWS will be none/negligible for both construction and operation respectively.</p> <p>However, the Council is concerned that insufficient information is provided within the Lighting Design Strategy to demonstrate there will be no adverse illumination of the County Wildlife Site, particularly the disused railway (where unimproved grassland is located).</p> <p>The Council seek an update to the ES Appendix 2.5 Lighting Design Strategy (App Doc Ref 5.4.2.5) [APP-072] to confirm that a dark corridor will be maintained along the disused railway of the CWS, under Lighting Design Principle 6.</p> <p>The Council notes that the scheme will compliment the habitats located within the County Wildlife Site. However, the scheme doesn't seek to improve the County Wildlife Site itself, even though a section of the site falls within the site boundary and potential to be subject to visitor pressure, due to enhancement for recreational users.</p>
5. Biodiversity	5.8	The Applicant also refers to paragraph 4.1.2 and 4.1.4 of ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [AS-066], which	The Council welcomes this commitment, however, it is unclear how funding of the stakeholder engagement will be secured, to enable partners to effectively contribute.

		confirms the commitment to set up an Advisory Group. Through this Advisory Group, matters such as recreational use can continue to be discussed and managed.	Funding should be secured through planning obligations.
5. Biodiversity	5.8	Hydrological impacts to Stow -cum -Quy Fen SSSI	The Council welcomes the clarification provided and submission of the Outline Water Quality Monitoring Plan. The Council's concerns regard the monitoring of Stow-cum-Quy Fen SSSI have been resolved.
5. Biodiversity	5.8	River Cam  In relation to the impacts of lighting, the River Cam CWS is represented by receptor LR13 in ES Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS -100]. Section 6.4, Table 6 -1 and 6 -2 of ES Appendix 15.3 Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS -100] concludes that the residual effect to LR13 is "none/negligible" for both construction and operation respectively.	The Council welcomes the Applicant's clarification that the residual effect of lighting on the River Cam CWS. The Council seek an update to the ES Appendix 2.5 Lighting Design Strategy (App Doc Ref 5.4.2.5) [APP-072] to confirm that a dark corridor will be maintained along the river corridor (outside of the 4 months of works), under Lighting Design Principle 6.
5. Biodiversity	5.8	Allicky Farm Ponds CWS  A draft Outline Water Quality Management Plan has been agreed in principle with the Environment Agency and will be submitted at Deadline 1. The final version of the plan, following approval from the Environment Agency, will be submitted at Deadline 2. The final approach to monitoring will be agreed through Requirement 22 (the water quality monitoring plan) of the draft DCO (App Doc Ref	The Council welcomes the clarification provided and submission of the Outline Water Quality Monitoring Plan. The Council's concerns regard the monitoring of Allicky Far Ponds CWS have been resolved.

		2.1) [AS -139], with this approach recorded within the SoCG with the EA.	
5. Biodiversity	5.8	Water Vole	The Council welcomes the clarification provided and submission, as well as further discussion with the Applicant. The Council's concerns regarding water vole mitigation have been resolved.
5. Biodiversity	5.8	Bast - surveys	The Council welcomes the clarification provided and submission, as well as further discussion with the Applicant. The Council's concerns regarding bat surveys have been resolved.
5. Biodiversity	5.8	Code of Construction Practice Part A	There is no consideration of arable flora or veteran trees within the CoCP Part A Please see further details within Council's Local Impact Report [ / Response to ExAQ1 [REP1-133] regarding outstanding concerns for the CoCP Part A.
5. Biodiversity	5.17	Bast - surveys	The Council welcomes the clarification provided and submission, as well as further discussion with the Applicant. The Council's concerns regarding bat surveys have been resolved.
5. Biodiversity	5.19	The Applicant will submit a detailed lighting plan post DCO consent, to Natural England, accompanying the bat licence application. This document will provide the detail on operational lighting required and will outline mitigation and how this is secured.	The Council seeks the principles of the proposed sensitive lighting for bats to be included within Principle 6 of the Lighting Design Strategy [ <b>APP-072</b> ], as set out in Council's Response to ExAQ1 [REP1-129] (question 5.16).
5. Biodiversity	5.26	The Applicant has amended requirement 10(6)(e) to ensure that 20% BNG in respect of river units is delivered.	The Council notes the update of DCO Requirement 10(6)(e) to secure 20% BNG. BNG should be a pre-commencement requirement and therefore, the Council is still unclear why 20% BNG has not been incorporated

			into 10(2) to ensure it forms part of the detailed construction outfall management and monitoring plan. As set out in Council's Response to ExAQ1 [REP1-129] (question 5.39).
5. Biodiversity	5.29	Paragraph 6.1.6 of the ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163] states that a Biodiversity Net Gain Audit Survey and Report will be undertaken both at the end of construction and at the end of a 5-year aftercare period for new landscape planting and habitat creation.	<p>There is no mention within the Outline Construction Environment Management Plan [AS-057] about BNG monitoring at the end of construction.</p> <p>The Council is still unclear how monitoring / BNG audits will be undertaken on habitats works that fall outside the land covered by the LERMP [AS-066] or outline Outfall Management and Monitoring Plan [AS-073] / requirements 10/11 (see answer to question 5.33 below)</p>
5. Biodiversity	5.33	Habitats that were not part of the enabling phase mitigation and can only be reinstated after construction activities cease will be reinstated once construction has been completed. Paragraph 7.2.68 of CoCP Part A (App Doc Ref 5.4.2.1) [APP-068] also states that: "Reinstatement planting will be undertaken in the first available planting season following construction." Paragraph 7.2.69 requires that "planting as part of the Proposed Development which dies or becomes seriously damaged or diseased within five years after completion of construction will be replaced in the first available planting season with stock of the same species and size as that originally planted unless otherwise agreed with the Local Planning Authority"	<p>The Applicant's commitment to reinstate land after construction are welcomed (as part of the Code of Construction Practice Parts A &amp; B). However, it is unclear how details of the proposed re-instatement works, including species mixes / densities to be planted, and their management will be secured, given it does not fall within the LERMP. It is also unclear how the habitats will be monitored to ensure they are reinstated in accordance with BNG assessment.</p> <p>The Councils seek that such works are incorporated into the Landscape, Ecology and Recreational Management Plan [AS-066].</p> <p>If the Applicant continues to was to avoid including these elements, then we suggest a new requirement for a Landscape and Ecological Management Plan for habitats that fall outside of Requirement 10 / 11 be utilised, or alternatively, incorporated into Requirement 9 – CEMP.</p>

5. Biodiversity	5.37	<p>The Applicant does not agree that species mitigation should be captured solely through the LERMP as the scope of that document is for the area defined as the proposed WWTP.</p>	<p>The Council disagrees with the Applicant's approach. As seen within the Council, as well as other statutory consultees, comments there is concern that ecological compensation / mitigation / enhancements are spread across many documents or different processes (e.g. protected species licences). This raises concern that something may be missed, or conflict with mitigation for ecological features agreed elsewhere.</p> <p>The Council considered it would be beneficial for the LEMRP to cover all aspects of biodiversity for the entire scheme, so that an overall assessment of the scheme's ability to deliver adequate mitigation, compensation and enhancement can be easily determined.</p>
5. Biodiversity	5.57	<p>Fields supporting important arable flora The General Mitigation Measures as outlined within the CoCP Part A (App Doc Ref 5.4.2.1) [APP-068] and as listed in response 5.53 state:</p> <p>...7.2.6 A number of ecological commitments have been made in the ES (Chapter 8: Biodiversity, App Doc Ref 5.2.8). These will be incorporated into the CEMP(s)</p> <p>...7.2.8 pre-commencement surveys... to confirm presence or absence of protected species</p> <p>...7.2.14 if protected species are found during construction, then works will cease</p>	<p>The Council is unclear how fields supporting important arable flora would be reinstated.</p> <p>The outline Construction Environment Management Plan does not include any ecological commitments set out in the ES (Chapter 8: Biodiversity, App Doc Ref 5.2.8). It is therefore unclear whether it will / will not cover reinstatement of arable flora.</p> <p>The Applicant refers to the General Mitigation Measures outlined in the Code of Construction Practice Part A [APP-068] for protected species (pre-commencement surveys / cessation of works if protected species found). However, the majority of arable flora are not protected species (they are rare / notable) and there is no specific reference to arable flora within the CoCP Part A.</p> <p>The Council recommends that the CoCP Part A be expanded to incorporate measures to protect arable</p>

			<p>flora (including pre-commencement survey work and translocation / reinstatement.</p> <p>The Council recommends that tables 4-13, 5-7, 6-7, 7-9, 8-9 relating to Ecology and Nature Conservation within the Outline CEMP be updated to include the ecological commitments that will be covered by the detailed CEMPs, including reinstatement for arable flora.</p>
6. Carbon emissions and climate change mitigation and adaptation	6.10 c)	<p>IEMA's 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' guidance issued in February 2022. Page 7 of the IEMA 2022 guidance states that the baseline can be in the form of either "a) GHG emissions within the agreed physical and temporal boundary of a project but without the proposed project or b) GHG emissions arising from an alternative project design and assumptions". The Applicant selected b) as their baseline because an alternative baseline of a do nothing or upgrading the existing WWTP would not deliver the strategic outcome of freeing the existing sites for homes.</p>	<p>The Council's view is that for this particular project, comparison to the current operation of the existing site would be a more appropriate baseline.</p> <p>The IEMA guidance (p17) also explicitly states that a baseline is a reference point... "sometimes referred to as business as usual (BaU)".</p> <p>The applicant's response is a slight misquote of the guidance in that it does not refer to "assumptions" (in either option). Rather, it refers to "GHG emissions arising from an alternative project design and/or <b>BaU</b> for a project of this type".</p> <p>For this particular project, I would argue that option A (GHG emissions "without the proposed project") and option B ("BaU") could both be interpreted as referring to the existing WWTP, since this is the current business as usual situation, and this is what would happen without the proposed development.</p> <p>Whether or not this choice of baseline would "deliver the strategic outcome of freeing the existing sites for homes", is completely irrelevant to whether or not it is the most appropriate baseline against which to compare the GHG emissions of the proposed development.</p>



			<p>The IEMA guidance, after giving the two options of the form that a baseline can take, goes on to say that “<i>The ultimate goal of establishing a baseline is being able to assess and report the net GHG impact of the proposed project.</i>” The ‘net impact of the proposed project’ can only be assessed by comparing it to the current ‘without development’ scenario. Since this project is a ‘relocation’ (a direct replacement), it is obvious that, in this case, the ‘without development’ scenario is the operational emissions of the existing plant.</p>
16. Major accidents and disasters – Planning Policy	Q16.6	<p>Applicant response included: “c) The Applicant is not aware of any Neighbourhood Plan policies relevant to the assessment. The Applicant will update ES Chapter 21: Major Accidents and Disasters (App Doc Ref 5.2.21) [AS 042] to include reference to Policy 26, Aerodrome Safeguarding, of the Cambridgeshire and Peterborough Combined Authority Minerals and Waste Local Plan.”</p>	<p>Clarification – it is believed that this should read Policy 25: Aerodrome Safeguarding of the Cambridgeshire and Peterborough Minerals and Waste Local Plan. The Cambridgeshire and Peterborough Minerals and Waste Local Plan was prepared by jointly by Cambridgeshire County Council and Peterborough City Council.</p>
10. Draft Development Consent Order	Q10.6 and 10.29	<p>Schedule 3 of the dDCO. Applicant has stated it does not wish to insert the public highway status of streets into the Schedule, because “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.”</p>	<p>CCoC contends that this response does not sufficiently address what is essentially a simple request. For the clarity of all parties, including the public, it would be helpful for the Schedule to clearly indicate whether an affected route is a public highway or not. This enhances all parties’ abilities to easily understand the effect of the DCO on the local network. The applicant’s argument that the status of a route may change in the future misses the point – any route, highway or private, could be subject to a change in status via an appropriate legal process; that does not obviate the necessity of indicating public/private status in the DCO or related documents.</p>



10. Draft Development Consent Order	Q10.6	Article 13 of the dDCO. CCoC has requested a schedule of proposed temporary closures to PROW. The applicant responds that this is already contained within the relevant DCO schedule.	CCoC's original comment was not intended to refer to the schedule of PROW closures contained within the DCO, but it is acknowledged that the wording used by CCoC may have caused confusion on this matter. CCoC requests a programme of proposed temporary closures to PROW, including the anticipated date of commencement and duration of any closure, to be included as part of the CTMP. This would provide CCoC with a holistic understanding of the impact of temporary closures on the local PROW network at any one time. (This would be without prejudice to any additional temporary closures/diversions that the undertaker may later deem necessary, which would then be agreed and processed according to the relevant DCO provisions). The approval by CCoC of the CTMP itself should be a condition of the DCO.
10. Draft Development Consent Order	Q10.6	Article 13(4) of the dDCO. CCoC has requested that the creation of new PROW should be subject to the same protective provisions as any other highway works. The applicant has not accepted this.	CCoC does not accept the Applicant's response. A public right of way (including a bridleway) is defined as a highway under the Highways Act 1980 and should not be dismissed as "merely a public route across land". While a PROW will clearly have different standards of construction to a new tarmacadam carriageway, it remains the case that a new highway is being brought into being and the local highway authority should have the same ability to scrutinise such a highway's construction as any other new road. Accordingly, any protective provisions must be applicable to the creation of new PROW and this should be recognised in the DCO.
20 Traffic and Transport	Q16.6	a) The Applicant confirms that they are not aware of further local policies relevant to ES Chapter 21: Major Accidents and Disasters	Applicant response included: "c) The Applicant is not aware of any Neighbourhood Plan policies relevant to the assessment. The Applicant will update ES Chapter 21: Major Accidents and Disasters (App Doc Ref 5.2.21)

		<p>(App Doc Ref 5.2.21) [AS-042] other than items indicated in parts b) and c) below.</p> <p>b) The Applicant confirms that they are not aware of other emerging local policies relevant to ES Chapter 21 Major Accidents and Disasters (App Doc Ref 5.2.21) [AS-042]. The document will be updated to note that policy sections of relevant chapters of the ES should be referred to in relation to emerging policies, i.e. reference to flood risk policies in ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [AS-040]. This will be corrected in the Environmental Statement Errata (App Doc Ref 8.4) submitted at Deadline 1 to refer to ES Appendix 2.3 Outline Decommissioning Plan (App Doc Ref 5.4.2.3) [AS-051].</p> <p>c) The Applicant is not aware of any Neighbourhood Plan policies relevant to the assessment. The Applicant will update ES Chapter 21: Major Accidents and Disasters (App Doc Ref 5.2.21) [AS042] to include reference to Policy 26, Aerodrome Safeguarding, of the Cambridgeshire and Peterborough Combined Authority Minerals and Waste Local Plan.</p> <p>d) Not for the Applicant to respond to.</p>	<p>[AS 042] to include reference to Policy 26, Aerodrome Safeguarding , of the Cambridgeshire and Peterborough Combined Authority Minerals and Waste Local Plan.”</p> <p>Clarification – it is believed that this should read Policy 25: Aerodrome Safeguarding of the Cambridgeshire and Peterborough Minerals and Waste Local Plan. The Cambridgeshire and Peterborough Minerals and Waste Local Plan was prepared by jointly by Cambridgeshire County Council and Peterborough City Council.</p>
20 Traffic and Transport	Q20.19	<p>On the matter of abnormal load ES Chapter 19 (App Doc Ref 5.2.19) [AS-038] Para 4.2.4 states, “Construction movements which are required for [...] he Applicant’s response is the movement of some materials to construction areas that are classed as dangerous loads or that are classed as abnormal loads (DfT, 2022).</p>	<p>The Applicants response is welcomed by the Local Highway Authority.</p>

		<p>Abnormal loads will be required for access platforms, process tanks, and pipe bridges.” a) Peak monthly AILs are indicative at this stage of development, however worst case is likely to be maximum of 10-14 per month in peak construction periods at the proposed WWTP. The Applicant can confirm the AILs will be accessing the proposed WWTP site only via the A14 junction 34. The Applicant can confirm these would be managed through the CTMP (App Doc Ref 5.4.19.7) [AS-109] and CoCP Part A (App Doc Ref 5.4.2.1) [APP-068] Section 3 which requires the appointment of a Community Liaison Officer who will be responsible for stakeholder liaison which includes a construction forum and to ensure timing with other projects is checked and that required permissions and notifications are achieved prior to AILs being delivered. Schedule 2 Part 1, Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-139] requires the measures specified within the CoCP to be contained within the relevant construction environment management plans, and for a detailed construction traffic management plan to be produced which must accord with the measures set out in the construction traffic management plant. b) During the enabling phases it is only envisaged to be mobile cranes and low loaders for excavator delivery that will travel to the proposed WWTP. All other AILs will be during the construction phase of the development These movements are expected</p>	
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		<p>to occur outside of peak hours. Page 144 of ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) [AS-038] states that “implementation of the CTMP in particular Section 4.2 (Local routing and site plant vehicle routing) which requires abnormal loads to have specific measures including appropriate vehicle escort and marshalling where required and timing of movement to be outside peak hours (i.e., school start and finishing times). All deliveries will be made outside of peak hours (8am-9am and 3pm-4pm) unless it is determined to be essential that the delivery is to be completed during peak hours.” c) These movements would travel to their destination via the Strategic Road Network, the A14, and use the slip roads at Horningsea Road. The Applicant does not expect to have to use any AIL for the Transfer Tunnel or Waterbeach Pipeline Schedule 2 Requirement 9 of the draft DCO (App Doc Ref 2.1) [AS-038] requires a CTMP for each phase of the development to be submitted and approved alongside the CEMP for such phase. As part of this process any updates to the CTMP would require consultation with the relevant highway authorities to confirm the permitted routes, timescale for permissions to be granted and any additional mitigation measures to ensure minimised impact on the transport network, including emergency services operational routes. d) No route testing for abnormal loads has road been carried out. The A14 as part of the Strategic Road Network</p>	
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		<p>and junction 34 at Horningsea Road would be designed to be suitable for all types of HGV 212 ExQ1 Question to Question Response vehicle, and therefore with suitable management in place would be expected to be suitable for AILs. The Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) [AS-109], paragraphs 4.2.5 and 6.4.1 set out that AILs will be managed on an individual basis and will be delivered out of hours if this is required. The provision in the CTMP is secured by Requirement 9 of the draft DCO (App Doc Ref 2.1) [AS-139]. e) The Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) [AS-109], Section 6.3 'Adherence to Designated Routes' provides details of routes to be used for journeys to and from the site. Para 6.3.2 of the CTMP makes note of the weight limits, enforced by TROs by CCoC, on: - South of the A14, Horningsea Road. Subject to an 18t weight restriction, except for access which extends 30m south from the on-slip in a southerly direction towards Fen Ditton. - North of the A14, Horningsea Road. Subject to a 7.5t weight restriction, except for access which beings approximately 30m north of the A14 off-slip extending north towards Horningsea. - The village of Waterbeach is subject to a weight restriction of 7.5t except for access which begins at the Car Dyke Road/A10 and Denny End Road/A10 junctions, both in an easterly direction towards Waterbeach village. f) Following discussions held with East of England</p>	
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		Ambulance Service (EEAST), the Applicant notes that EEAST has requested to be kept up to date with construction, which would include the movements of AILs where required. The Applicant would inform EEAST through the construction forum, which is a requirement of the CTMP (App Doc Ref 5.4.19.7) [AS-109] Para 4.2.5, which notes that the delivery of AILs, where additional mitigation is required (such as marshalling and appropriate vehicle escort), would be communicated in the construction forum and local community groups before arrival. This requirement is also contained within the Community Liaison Plan (App Doc Ref 7.8) [AS-132].	
20 Traffic and Transport	Q20.38	c) The Applicant confirms that this would be managed by the provisions at Para 6.8.1 of the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) [AS-109] which states where temporary alterations are required, the highway will be restored to the same condition as before the works took place or to a standard which is acceptable to CCC as the Local Highways Authority. d) Highway conditions surveys would take place before and after constructions works and will be agreed with CCoC as required. This requirement is set out within Paragraph 6.8.1 within the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) [AS-109].	(paragraphs c & d only) The Applicants response is welcomed by the Local Highway Authority.
20 Traffic and Transport	Q20.39	Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) [AS-109] and The Code of Construction Practice (CoCP) Part A (App	(g) CCC would still seek confirmation that the applicant has engaged with the developers of Waterbeach New Town, to demonstrate that the use of Bannold Road is

	<p>Doc Ref 5.4.2.1) [APP-068]. The CTMP (App Doc Ref 5.4.19.7) [AS-109], Section 4 'Access and Route Strategy' provides details on vehicle routing and Section 6.3 'Adherence to Designated Routes' outlines the measures in place for adherence to designated routes.</p> <p>b) The Transport Assessment Part 1 (App Doc Ref 5.4.19.3) [AS-108a] Section 4 'Existing Networks and Baseline Transport Conditions', sub-section 4.2 'Waterbeach' provides an analysis of personal injury collisions (PIC) in Waterbeach from November 2016 to November 2021. Appendix A, Figure A.12 of the Transport Assessment shows a map of PIC in and around Waterbeach, as well as Clayhithe Road. Results of the PIC analysis shows that in the five year period there has been:</p> <ul style="list-style-type: none"> <li>• A total 21 slight collisions were recorded in the vicinity of Waterbeach, of which 11 were recorded within the settlement itself. No pattern could be observed for their occurrence.</li> <li>• A total of nine serious collisions were recorded in the vicinity of Waterbeach, of which two occurred in Waterbeach itself.</li> <li>• Two fatal collisions were recorded on the section of the A10 between Denny End Road and Car Dyke Road.</li> </ul> <p>c) As stated in ES Chapter 10 (App Doc Ref 5.2.10) [APP-042], Table 2-3, to estimate carbon emissions from the transport of materials, reasonable transport distances were agreed with the Applicant. These distances were based on typical procurement practices</p>	<p>the only viable alternative to access sites, COA12, COA13, COA14, COA17, COA18, COA26 and COA29. This routing will remove significant levels of construction traffic for the village of Waterbeach.</p>
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		<p>and supplier locations (for example concrete is typically sourced from within 50km of a site). Given this approach of using approximate transport distances, changing the local route would not impact the carbon assessment.</p> <p>d) Transport during construction has a minor impact on the overall whole life carbon footprint of the Proposed Development, therefore additional or reduced mileage should not significantly influence the overall carbon assessment. Additional mileage of construction plant has already been accounted for within the ES Chapter 10: Carbon (App Doc Ref 5.2.10) [APP-042] summarised in Table 4-1, these account for typical transport distances of materials and products from typical industry suppliers. Therefore, the scale of these emissions has already been accounted for within the increased construction emissions associated with the Proposed Development. There could be positive benefits through a reduction in transport distances for products/materials and also through the decarbonisation of transport methods, however, the Applicant cannot commit that these will be possible through its supply chain. Based on the carbon assessment transport emissions account for between 1-10% of product/material emissions and are estimated to be in the region of 2-5% of overall project level emissions.</p> <p>e) A commitment was made in Phase 2 Consultation (CON 2) to prohibit the movement</p>	
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		<p>of HGV traffic through the settlements of Horningsea and Fen Ditton. This requirement is recognised in the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) [AS-109] and The Code of Construction Practice (CoCP) Part A (App Doc Ref 5.4.2.1) [APP-068]. The CTMP [AS-109], Section 4 'Access and Route Strategy' provides details on vehicle routing and Section 6.3 'Adherence to Designated Routes' outlines the measures in place for the adherence to designated routes. Furthermore, the CTMP (App Doc Ref 5.4.19.7) [AS-109] Paragraph 6.9.10 states the commitment to avoid routing HGV movements through Waterbeach during school drop-off and pick-up hours during term time.</p> <p>f) The Applicant took part of a Traffic Working Group (TWG) meeting on the 27 May 2021, held with CCoC and National Highways to discuss construction route options. CCoC noted at the meeting that the monitoring and enforcement of the construction routes would be a sensitive issue especially with regards to construction traffic at Waterbeach. The ES Chapter 19 (App Doc Ref 5.2.19) [AS-038], Table 1-4 outlines the matters discussed at TWGs between the Applicant and 222 ExQ1 Question to Question Response consultees. The Applicant has produced swept path drawings for the Hartridge's Lane / Clayhithe Road junction, available at Appendix G of the Transport Assessment Part 2 (App Doc Ref</p>	
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		<p>5.4.19.3) [AS-108b] (drawing 102375-MMD-01-XX-DR-C-DRAFT) and shows a red boundary which represents the land that would be potentially required for the access of construction traffic. Additionally, the dDCO (App Doc Ref 2.1) [AS-139] Part 3 Requirement 10 grants the Applicant the powers to carry out street works on streets listed in Schedule 3 'Streets subjects to street works', which includes Hartridge's Lane.</p> <p>g) Applicant took part of a Traffic Working Group (TWG) meeting on the 27 May 2021, held with CCoC and National Highways to discuss construction route options. CCoC noted at the meeting that the monitoring and enforcement of the construction routes would be a sensitive issue especially with regards to construction traffic at Waterbeach. However, no issue was raised specific to Bannold Road and Long Drove. The Applicant has responded to local residents to confirm Long Drove would remain open to residents to pass throughout the work, as would Bannold Drove. The Applicant has produced swept path drawings for Bannold Road (drawing title 'temporary access junction COA14') and Long Drove (drawing title 'temporary access junction CA29'), available at Appendix G of the Transport Assessment Part 2 (App Doc Ref 5.4.19.3) [AS108b] which show that there would be no accessing the works site on Bannold Road and Long Drove but that there are restrictive road widths. Additionally, the dDCO (App Doc Ref 2.1) [AS-139] Part 3</p>	
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		<p>Requirement 10 grants the Applicant the powers to carry out street works on streets listed in Schedule 3 'Streets subjects to street works', which includes Bannold Road and Long Drove.</p> <p>h) The Applicant refers to para 6.9.11 of the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) [AS-109], which outlines required measures intended to manage construction vehicle movements at level crossings on Bannold Road and Station Road. These measures are:</p> <ul style="list-style-type: none"> <li>• restricted working hours,</li> <li>• speed restrictions and</li> <li>• the use of banks persons.</li> </ul>	
20 Traffic and Transport	Q20.92	<p>The Applicant notes the error in drafting on page xii of ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) [AS-038] and that this should refer to Cambridge County Council who are, as noted, the highway authority.</p> <p>The Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) [AS-109] requires that a Community Liaison Officer (CLO) be appointed prior to the commencement of construction activities. The CLO will play a key role in ensuring that relationships and lines communication are maintained throughout the construction period. Section 3 of the Code of Construction Practice (CoCP) Part A (App Doc Ref 5.4.2.1) [APP-068] and Section 3 within the Community Liaison Plan (App Doc Ref 7.8) [AS-132] provides details on the responsibilities of</p>	<p>The Local Highway Authority is Cambridgeshire County Council (not Cambridge County Council as stated by the applicant). The information provided by the applicant does not respond to the ongoing concerns that the Local Highway Authority has about the use of the DCO to enable works to be carried out within the adopted public highway.</p>

		the CLO, one of which is being main point of contact for stakeholders, providing briefings on construction activities, promoting the project and resolving issues of concern.	
20 Traffic and Transport	Q20.93	The Applicant's net zero strategy to 2030 sets out that by 2030, 90% of all the small vehicle fleet will be replaced by Electric Vehicles. To help support this, the proposed WWTP site will have provision of 23 spaces equipped with active electric vehicle (EV) charging points upon the commencement of operation. Passive provision for an additional 30% active EV spaces at the proposed WWTP will be provided, as per Policy I/EV of the new Greater Cambridge Local Plan and will be developed as part of the Operational Workers Travel Plan (App Doc Ref 5.4.19.8) [APP-149] requirements. This is set out paragraph 2.5.9 of the Transport Assessment Part 1 (App Doc Ref 5.4.19.3) [AS-108a], and Table 5-1 of the Outline Operational Logistics Traffic Plan (OLTP) (App Doc Ref 5.4.19.10) [AS-111].	Details of EV charging should also be presented in the Operational Workers Travel Plan [APP-149] as well as the Operational Logistics Traffic Plan [AS-111] prior to the determination of the DCO.
20 Traffic and Transport	Q20.94	Section 11 of the Operational Workers Travel Plan (Doc 5.4.19.8) [APP-149] describes how monitoring will take place so that the Proposed Development achieves the Travel Plan targets. Staff surveys will take place annually throughout the five-year lifespan of the travel plan. Monitoring of the OWTP will be the responsibility of the Travel Plan Coordinator (TPC). This will be agreed with CCoC and the TPC will report to CCoC. The outcome of the survey will be used to update successive	The County Council requires firmer commitments to the Operational Workers Travel Plan [APP-149] measures prior to the DCO being determined. These will have a potential cost implication which must be considered prior to the determination of the DCO.

		versions of the Travel Plan, which will include new measures if targets are not being met. This is secured through the dDCO (App Doc Ref 2.1) [AS-139], Schedule 2, Part 1, requirement 12.	
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