

Cambridge Waste Water Treatment Plant Relocation Project
Anglian Water Services Limited

Applicant's Comments on Local Impact Reports

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1 Introduction

1.1 Purpose of this document

- 1.1.1 This document provides Anglian Water Services Limited (the Applicant) comments on the Local Impact Reports (LIRs) submitted at Deadline 1 for the Cambridge Waste Water Treatment Plant Relocation Project (CWWTPRP).
- 1.1.2 Local Impact Reports were submitted to the Examining Authority by South Cambridgeshire District Council, Cambridge City Council and Cambridgeshire County Council. The Applicants comments have been set out per Local Impact Report in the tables in Section 2 of this document. For ease of reference the reference numbers in the left hand column of each table reflect the heading/subheading/, paragraph number and/or table number in the relevant Local Impact Report.
- 1.1.3 This document does not seek to respond to each point made in the LIR. The Applicant recognises that the purpose of the LIR is to enable the local authorities to provide 'a report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area).
- 1.1.4 The Applicant has already set out its assessment of these matters in the application documents, and particularly in the Environmental Statement which assesses impacts in accordance with the project's Scoping Opinion.
- 1.1.5 Accordingly, the Applicant has taken the following proportionate approach to commenting on the LIRs:
- it does not attempt to provide a comprehensive commentary on each detailed matter within the LIR;
 - where matters have moved on from those described in the LIR, this document provides or signposts to relevant updated information (for example as contained in new or updated documents submitted in Deadline 1 or in the Applicant's response to Relevant Representations and ExQ1);
 - where there is concern that matters may not have been set out in the LIR fully or that assertions of impact may not be consistent with or supported by evidence, this document summarises the Applicant's concern; and
 - this document does not repeat matters which are already set out in documents available to the examination – rather it summarises them at a high level and provides reference to where that information can be found, including in the Applicant's response to questions from the Examining Authority or Statements of Common Ground submitted to the examination.
- 1.1.6 The section that follows has a table per LIR and each table follows the section references for ease of reference corresponding to section references in the LIR.

2 Applicant's Comments on Local Impact Report

Table 2-1: South Cambridgeshire District Council

Reference	Topic	Applicant's Response
4	Planning Policy	<p>In the context of its comments at paragraphs 4.3 - 4.5 on national planning policy and specifically the relevance of the NPSWW and NPSWRI, the Applicant agrees with the Council that even in the event that it is concluded that an NPS does not have effect but is relevant to a proposed DCO development, it would fall within the category of matters which are <i>"both important and relevant to the Secretary of State's decision"</i>. In the Applicant's opinion, this would certainly apply in this instance to the NPSWW (for the reasons set out in the Applicant's responses to ExQ1 2.2e) and f) (App Doc Ref 8.3) [REP1-079] but would not apply to the NPSWRI which, as set out at section 3.7 of the Planning Statement (App Doc Ref 7.5 [REP1-049] and the Applicant's response to ExQ1 2.1 (App Doc Ref 8.3) [REP1-079], is not relevant to waste water treatment and this particular application.</p> <p>In addition to the NPPF sections listed by the Council, the Applicant also considers section 6 'Building a strong, competitive economy' and section 11 'Making effective use of land' are of relevance as referred to in our response to ExQ1 2.19 (App Doc Ref 8.3) [REP1-079].</p> <p>The Applicant notes that the document library of historic, current and emerging development plans, supplementary planning documents, relevant reports and supporting evidence at Appendix 1 of the Council's LIR includes most of the documents referred to in Local Policy Context section (2.3) of the Applicant's Planning Statement (App Doc Ref 7.5) [REP1-049]. The documents not included are generally earlier draft versions of the NECAAP and now adopted Local Plans (eg the 2014 CNFE AAP Issues and Options and 2019 NECAAP Issues and Options Update Report, and the 2020 GCLP First Conversation Regulation 18 Issues and Options and supporting Sustainability Appraisal of Issues and Options December 2019). Since these have been overtaken by later documents, the Applicant is of the opinion that it is not necessary for the ExA to be provided with these documents which are referred to only for context. An extract of the Cambridgeshire and Peterborough Minerals and Waste Plan Site Specific Proposals Development Plan Document – Preferred Options December 2006 identifying Honey Hill (Site SSP15) has been separately provided in response to ExQ1 2.9 (App Doc Ref 8.3) [REP1-079].</p>

Reference	Topic	Applicant's Response
6	1 - Strategic Development Plan Context	<p>The significance of the HIF award as the 'game changer' referenced at paragraph 6.24 to finally enable the viability constraint for relocation to be overcome and for the long-held ambition for regeneration of the NEC area to be realised supports the response provided by the Applicant to ExQ1 2.11 (App Doc Ref 8.3) [REP1-079] that this represents a material change in circumstance such that greater weight should now be placed on the draft NECAAP and emerging GCLP in this instance than would normally be the case having regard to the advice at NPPF paragraph 48.</p> <p>The specific significance of NEC in being able to substantially contribute to meeting housing needs and to support the continued strong growth of Cambridge as one of the UK's most important research and innovation-led employment hubs is clearly recognised by the Council at paragraphs 6.111 - 6.112. This is indeed the basis for the focus being given by Government to the realisation of the significant development opportunity which would be unlocked by the Proposed Development through the Cambridge 2040 initiative and, in particular, the creation of the Cambridge Development Group and the specific working group charged with accelerating the relocation of the existing WWTP (paragraphs 6.113 - 6.115). The planning benefits unlocked by the Proposed Development, and made deliverable by the HIF grant, are recognised as being 'substantial' in sustainable development terms (paragraph 6.116 - 6.117) and are separate and in addition to the benefits arising from the new WWTP set out at paragraph 2.2.17 of the Planning Statement (App Doc Ref 7.5) [REP1-049].</p>
7	2 – Green Belt Policy	<p>The Applicant has provided more detail on its assessment of the extent to which the Proposed Development constitutes inappropriate development in the Green Belt in its response to ExQ1 11.1 (App Doc Ref 8.3) [REP1-079]. The Council and the Applicant agree that the area of land required for the proposed WWTP, surrounding earth bank and visitor's car park constitute inappropriate development and that the transfer tunnels, connecting infrastructure and discharge point are capable of satisfying the exception test at NPPF paragraph 150. The element not agreed is the access road, which the Council consider would have an urbanising effect impacting on openness as a result of both its appearance (ramp, splays etc) and vehicle movements on it. The Applicant considers that this access road would not appear as an incongruous feature in the Green Belt and, given that its route between the public road and the visitor car/WWTP gate entrance will be landscaped and remain undeveloped, is capable of satisfying the exception test at NPPF paragraph 150, although whether this loss of openness is sufficient to exceed the paragraph 150 threshold is a matter of judgement. This is consistent with the approach taken in Smithson Hill Limited appeal decision at Hinxton (APP/WW0503/W/18/3210008 - see paragraphs 320-331). Notwithstanding this point, if the access road is considered inappropriate development, its relative contribution to Green Belt harm is small (as identified in the Applicant's response to ExQ1 11.1 (App Doc</p>

Reference	Topic	Applicant's Response
		<p>Ref 8.3) [REP1-079] and is not considered to materially affect the planning balance that applies in determining this application.</p> <p>The Council considers that there are substantial benefits that arise from the Proposed Development that can collectively amount to very special circumstances. These are described at paragraph 7.14 and are consistent with the benefits listed by the Applicant at paragraph 6.2.13 of the Planning Statement (App Doc Ref 7.5) [REP1-049]. Acceptance by the Secretary of State that these considerations clearly outweigh the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the Proposed Development, would mean consistency with SCDC Local Plan Policy S/4 and, based on the measures incorporated in the design and delivered through ES Appendix 8.14 LERMP (App Doc Ref 5.4.8.14) [AS-066] to mitigate Green Belt impact, SCDC Local Plan Policy NH/8.</p>
8	3 – Landscape	<p>The Applicant notes that the matters the Council raises under Topic 3 - Landscape are considered to constitute 'any other harm' in Green Belt policy terms (NPPF paragraph 148). The scale of the Proposed Development and the necessity in this particular instance of its siting in a relatively open part of the Cambridge Green Belt is recognised by the Applicant as having harmful impacts which cannot wholly be mitigated such that the Proposed Development will not be visible or can be designed in such a way that it is in keeping with the existing landscape character. This is considered in detail in ES Chapter 15 Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034]. The harm here is assessed as 'large adverse and significant' (as summarised in ExQ1 – 1.12 Appendix A) but is of a degree anticipated in the NSPWW (see, for example, paragraphs 1.4.4, 4.7.6 and 4.7.12). NPSWW paragraphs 4.7.13 and 4.7.14 emphasize the importance of careful design in order to minimise harm to the landscape, including by means of reasonable mitigation, and the need for the decision maker to weigh visual impacts against the benefits of the development. The Applicant has sought to mitigate impacts consistent with NPSWW paragraphs 4.7.16 and 4.7.17, including through the incorporation of the earth bank and strong woodland planting blocks which, although potentially considered out of character with the existing landscape, will positively assist the assimilation of the Proposed Development into the area in the short term and provide a very strong foundation in which to allow the landscape planting to mature. The balance struck in seeking to mitigate the impact of the Proposed Development in landscape and visual amenity terms is considered appropriate.</p> <p>Responding to more specific comments, in response to paragraph 8.4: The Applicant acknowledges that growing conditions along the top of the four earth banks which make up the rotunda earthwork will be drier than those at ground level. ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (LERMP) (App Doc Ref 5.4.8.14) [AS-066] sets out the approach to planting,</p>

Reference	Topic	Applicant's Response
		<p>landscape maintenance and watering. By specifying a wide variety of tree species, planting them early in the winter, maintaining and watering them, the chances of the trees becoming established and growing well are increased. Tree and hedgerow species will be selected to withstand the drier conditions. ES Appendix 8.14 LERMP (App Doc Ref 5.4.8.14) [AS-066] shows a typical section across the top of the earth bank (Figure 3.4) which illustrates the 6m wide flat area along its spine, comprising a 3.5m wide planting zone and a 2.5m wide grassed maintenance zone. This flat area will catch and retain rainwater and irrigation (carried out for the first five years after planting). Measures set out in ES Appendix 6.3 Outline Soil Management Plan (App Doc Ref 5.4.6.3) [REP1-033] will be taken to preserve the quality of topsoil stripped from the site at the start of construction for reuse on the earth banks and other parts of the site. Tree planting is also proposed in ES Appendix 8.14 LERMP (App Doc Ref 5.4.8.14) [AS-066] around the earth banks at ground level and it is likely that these trees will grow faster than planting along the top of the bank. However, the many flood banks and earthworks present in the countryside around the Proposed WWTP are often vegetated, demonstrating that planting can be established on banks..</p> <p>In response to paragraphs 8.5-8.6: The landscape masterplan in ES Appendix 8.14 LERMP (App Doc Ref 5.4.8.14) [AS-066] includes belts of woodland around the Proposed WWTP site. These are intended to screen the Proposed WWTP while maintaining some views into the site. Following 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. The design aims to find a balance between the need for screening and the need to respond to the local landscape character. Widening the gaps between the woodland blocks would potentially open up views of the Proposed WWTP.</p> <p>In response to paragraphs 8.12-8.13: The approach to the design of the landscape masterplan and the consultation with Greater Cambridge Shared Planning Service and the Landscape and Heritage Technical Working Group during design development is described in paragraphs 2.1.4, 2.1.5 and 3.1.3 of ES Appendix 8.14 LERMP (App Doc Ref 5.4.8.14) [AS-066]. Paragraph 3.1.3 of ES Appendix 8.14 LERMP (App Doc Ref 5.4.8.14) [AS-066] refers to the Greater Cambridge Landscape Character Assessment (2021) and sets out how the design of the landscape masterplan was influenced by assessment. The specific landscape sensitivities listed in the Greater Cambridge assessment are: <i>small scale pastoral fields, shelter belts and associated vegetation including floodplain grazing marsh at village edges and adjacent to the River Cam, historic, linear drains and ditches including the Fleam Dyke</i>. The specific landscape guidelines in the Greater Cambridge assessment are: <i>conserve and enhance the regular small-scale pastoral fields,</i></p>

Reference	Topic	Applicant's Response
		<p><i>shelter belts and hedges at village edges, manage drains and ditches to maintain historic features and enhance ecological value of the farmed landscape and ensure development is in keeping with the open, rural character.</i></p> <p>Paragraph 3.1.1 of ES Appendix 8.14 LERMP (App Doc Ref 5.4.8.14) [AS-066] describes the aims of the landscape masterplan including screening and landscape integration, habitat creation, biodiversity net gain, provision of 'stepping stones' between fragmented habitats and improvements to the local recreational path network. The landscape masterplan responds to the sensitivities and guidelines in the Greater Cambridge assessment with the inclusion of new hedgerows, woodland and tree belts, linear sustainable drainage features and substantial new areas of grassland in the design. ES Chapter 15: Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034], acknowledges that the existing open rural character of the landscape within the boundary of the Proposed WWTP will become more wooded and less open. However, it would not be possible to screen the Proposed WWTP without extensive blocks of woodland.</p> <p>In response to paragraphs 8.14 - 8.17: Paragraph 3.1.3 of ES Chapter 15: Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034] lists the Greater Cambridge Landscape Character Area Assessment (2021) as one of the sources used to inform the establishment of the landscape character areas for the LVIA. Paragraph 1.3.2 of ES Appendix 8.14 LERMP (App Doc Ref 5.4.8.14) [AS-066] describes the evolution of the landscape masterplan and development of the rotunda design. Alternative designs were considered during the design development period as described in paragraphs 1.3.2-1.3.12 of ES Appendix 8.14 LERMP (App Doc Ref 5.4.8.14) [AS-066]. As stated above, ES Chapter 15: Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034] acknowledges that the existing open rural character of the landscape within the boundary of the Proposed WWTP will become more wooded and less open. However it would not be possible to screen the Proposed WWTP without extensive blocks of woodland.</p> <p>In response to paragraph 8.20: ES Appendix 15.5 Landscape and Visual Impact Assessment Methodology (App Doc Ref 5.4.15.5) [APP-131] sets out the terms used for the assessment. These are not standardised for LVIA and the guidance in the Guidelines for Landscape and Visual Impact Assessment, third edition (GLVIA 3) gives the use of major/moderate/minor/negligible as an example of the terms that could be use. Paragraph 3.34 in GLVIA 3 states: <i>When drawing a distinction between levels of significance is required (beyond significant/not significant) a word scale for degrees of significance can be used (for example a four-point scale of major/moderate/minor/negligible).</i></p>

Reference	Topic	Applicant's Response
		<p>In responses to paragraph 8.21: The heights of the structures in the Proposed WWTP above AOD are given in the ES Chapter 2: Project Description (App Doc Ref 5.2.2) [REP1-021]. The heights stated in ES Chapter 15: Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034] were given as above finished ground level (AFGL) to give a clearer sense of their height in context. ES Chapter 15: Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034] took into account the impacts of the structures of the Proposed WWTP as described in Table 2-6. The Applicant is happy to provide a table providing this comparison/clarification and will provide this for Deadline 3.</p> <p>In response to paragraph 8.30: The construction of the earth bank was not specifically described in ES Chapter 15: Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034] but the description of the landscape and visual effects in construction mentions earthworks as one of the sources of effect.</p> <p>In response to paragraph 8.31: The soil is being stripped from arable farmland and would be subject to the requirements specified in ES Appendix 6.3 Outline Soil Management Plan (App Doc Ref 5.4.6.3) [REP1-033] 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) [REP1-003] 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 soil management plan is one.</p> <p>In response to paragraph 8.32: ES Appendix 8.14 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. 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. Trees on the earth banks will be watered during periods of drought for the first five growing seasons after planting. 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>

Reference	Topic	Applicant's Response
		<p>In response to paragraph 8.42: ES Chapter 15: Landscape and Visual Amenity (App Doc Ref 5.2.15) [AS-034] states that as the mitigation woodland planting grows and matures, the character of the Eastern Fen Edge Landscaper Character Area will become more wooded and less open.</p> <p>In response to paragraphs 8.43-8.46: ES Appendix 8.14 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. 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. Trees on the earth banks will be watered during periods of drought for the first five growing seasons after planting. The species that will be selected to grow on the earth banks are found already growing in the area and tolerate the drier growing conditions of East Anglia. Measures set out in ES Appendix 6.3 Outline Soil Management Plan (App Doc Ref 5.4.6.3) [AS-060] will maintain the quality of existing soils stripped from the Proposed WWTP for reuse and the specification of topsoil and subsoil depths on the earth banks (under Requirement 9 of the draft DCO (App Doc Ref 2.1) [REP1-003] which requires the preparation of detailed plans including a soil management plan) will provide sufficient depth of top soil and subsoil to allow planting to establish and grow. The maintenance measures outlined in ES Appendix 8.14 LERMP (App Doc Ref 5.4.8.14) [AS-066], specification of soil depths and topsoiling in the future Detailed Soil Management Plan and careful choice of appropriate tree species will allow tree planting to establish on the 6m wide spine of the earth banks.</p> <p>In response to paragraph 8.47: The design of the woodland planting on the landscape masterplan in ES Appendix 8.14 LERMP (App Doc Ref 5.4.8.14) [AS-066] aims to create a balance between screening the Proposed WWTP from view and maintaining gaps between the woodland blocks, similar to the woodland belts already present in the area. The gaps between the rides are carefully planned to avoid opening up views of the Proposed WWTP and there is a danger that widening the gaps could open up views of the site.</p> <p>In response to paragraphs 8.48-8.51: The Applicant would like to clarify that the cyan key item that appears in the key of the figure is an error, given that this is a minor error which does not affect the interpretation of the figure it will be amended prior to the LERMP being approved. With regard to the Boxed text on drawing states 'Access to Anglesey Abbey and Stow cum Quy via the new bridleway' the Applicant does not agree that this needs to be updated to the suggested wording</p>

Reference	Topic	Applicant's Response
		<p>as other non-motorised users can still access both locations via the highway network therefore stating access is on foot only would be misleading.</p> <p>Section 4 of ES Appendix 8.14 LERMP (App Doc Ref 5.4.8.14) [AS-066] sets out the measures required for the implementation of the landscape masterplan. This comprises landscape and ecological mitigation and the applicant acknowledges that the use of the word creation is perhaps better suited to describing habitat creation (for example new grassland) rather than the establishment of new planting. In paragraph 4.2.1, the word establishment is used in relation to planting. A detailed management and maintenance plan based on the indicative principles set out in Section 4 will be agreed with stakeholders as required by Schedule 2 of the draft DCO (App Doc Ref 2.1) [REP1-003].</p>
9	4- Historic environment	<p>The Applicant and the Council agree that the harm to the setting of Baits Bite Lock, HCLA22 and Biggin Abbey is 'less than substantial'. Where any difference remains between them is in the extent to which this harm falls at the lower or higher end of less than substantial harm. The respective positions reflect different points of view on the extent to which character and setting are already impacted by modern infrastructure (including, but not limited to, the A14, overhead pylons and existing activity on and around the B1047 Horningsea Road and A14 junction 34) and the 'temporariness' of the impacts. In either perspective, however, the harm here is of a degree anticipated in the NSPWW (see, for example, paragraph 1.4.4) which needs to be weighed in the planning balance consistent with NPSWW paragraph 4.10.17 and does not fall within the threshold of 'significant' and trigger the statutory tests under the Town & Country Planning (Listed Buildings and Conservation Areas) Act 1990 as described at NPSWW paragraph 4.10.14.</p> <p>In response to more specific comments, the Applicant notes South Cambridgeshire Council's comments on harm in paragraphs 9.5 to 9.7. A detailed response on how harm was assessed is provided in the Applicant's Response to ExQ1 13.2 (App Doc Ref 8.3) [REP1-079].</p> <p>The Applicant notes the comments on temporary construction effects, paragraphs 9.14 - 9.16. The Applicant is comfortable with the level of reported temporary construction effects. The Applicant has provided further details in the Applicant's Response to ExQ1 13.15 (App Doc Ref 8.3) [REP1-079]. The Applicant refers to the ES Chapter 2: Project Description (App Doc Ref 5.2.2) [REP1-021], which gives a description of the worst-case scenario for the construction programme and details on the construction activities which will take place (included proposed</p>

Reference	Topic	Applicant's Response
		<p>control measures for noise and sound). The construction activities will be controlled through the CoCP (Doc REF) and the CEMP (DOC REF).</p> <p>The Applicant notes the comment on the permanent construction effects, paragraphs 9.21 - 9.30.</p>
10	5- Carbon	<p>The LIR notes at paragraph 10.5 that the alternative (less preferred) option of Combined Heat and Power (CHP) engines would result in a higher level of lifetime carbon emissions. At paragraph 10.28 similar reference is made to operational carbon emissions arising from the DMO/CHP configuration of the plant. ExA should note, however, that this operational carbon is mitigated by the Applicant's commitment to ensure operationally net zero (Requirement 21 of the dDCO), this commitment is not acknowledged in the LIR.</p> <p>The Applicant considers that the Council's position outlined at 10.16 in respect of the Code of Construction Practice and Construction Environmental Management Plan is disproportionate. The 70% target is aspirational and, while achievable, is not assessed in the Environmental Statement and is not a part of the application under consideration by the ExA. Reporting on construction carbon would form part of the detailed design requirements secured under DCO Requirement 7 which requires the approval of a Construction Method Statement for each phase, accompanied by an explanation as to how each phase accords with the Design Objectives in the Design and Access Statement. The Applicant will discuss with the Council the mechanism for simplified carbon reporting outside of the structures of the CoCP and CEMP, which are not suited to this task.</p> <p>In respect of paragraphs 10.18 and 10.19 (capital replacements), the Applicant can clarify that capital replacements cover the like for like replacement of assets that reach the end of their operational life within the assessment period e.g. concrete structures expected asset life of 60 years and M&E of 20 years, this is in addition to annual routine maintenance. The rationale for excluding these emissions from the operational phase is due to these emissions happening at given intervals throughout the assessment period and not on an annual basis. The scale, intensity and timing of these emissions can be found in Table 2-20 and 2-21 of Appendix 10.1 GHG Calculations [APP-109].</p> <p>The Applicant notes the Council's characterisation of operational impacts of both the DMO and DCO as an adverse impact; however, ExA's attention is also drawn to paragraph 10.22 where it is acknowledged that emissions per megalitre of water are significantly reduced from the baseline of the existing treatment works, there is, therefore, a significant improvement in operational carbon performance.</p>

Reference	Topic	Applicant's Response
		<p>The Applicant notes the Council's assertions at 10.30 and 10.31 around securing of updated and accurate information through a further requirement in the DCO. The Applicant believes an additional requirement would be disproportionate and believes that the Outline Carbon Management Plan and the proposed Detailed Carbon Management Plan provide mechanisms to provide updated information related to carbon emissions. The Applicant continues to engage with the Council to agree how to communicate updates and how the Outline Carbon Management Plan could effectively be used to provide updates in the future. In relation to the requirements set out in 10.32, the Applicant continues to review how it may cover future decommissioning emissions and also future expansion requirements and continues to discuss this with the Council.</p> <p>The issue of the assessment of future decommissioning of the proposed WWTP (first bullet, 10.32) is addressed in the Applicant's response to the examining authority's first questions (ExQ1, 1.24) and is not discussed further here.</p> <p>In respect of the second bullet at 10.32, the Applicant does not intend to provide assessment of future expansion, which would be subject to the appropriate consenting processes, including, if necessary, environmental impact assessment, at the relevant time. Providing speculative carbon estimates of unknown upgrades at an unknown time in the future would serve no useful purpose.</p>
11	5 Ecology and Biodiversity	<p>In relation to paragraph 11.5: The Applicant has updated Table 2-8 and provided an updated ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) at Deadline 2 to provide a justification as to the temporary increase in ambient light levels during construction. This text will state that the maximum design scenario provided represents the extent of construction lighting which could require lighting temporarily.</p> <p>In relation to paragraph 11.7: The Applicant will provide appropriate strategies relating to invasive non-native species as required, should invasive species not be able to be avoided. This is secured as part of paragraph 7.2.59 of the CoCP Part A (App Doc Ref 5.4.2.1) [REP1-025]. Whilst the CoCP Part A provides broad measures, specific construction method statements will be prepared by the Principal Contractor to prevent the spread of invasive non-native species, as informed by pre-construction surveys.</p>

Reference	Topic	Applicant's Response
		<p>In relation to paragraph 11.8: The Applicant will include specific and appropriate measures for dealing with invasive non-native species, and any resultant contaminated soil as part of specific construction method statements prepared by the Principal Contractor's Environmental Manager.</p> <p>In relation to paragraph 11.12: The Applicant outlines in paragraphs 7.2.47-7.2.50 of the CoCP Part A (App Doc Ref 5.4.2.1) [REP1-025] that a Reptile Mitigation Strategy will be prepared by the contractor prior to works commencing, and this strategy will be agreed with the local authority ecologist. The CoCP Part A (App Doc Ref 5.4.2.1) [REP1-025] does not provide detail on possible mechanisms to avoid potential double-handling of animals during translocations, with this detail to be provided as part of the agreed Reptile Mitigation Strategy.</p> <p>In relation to paragraph 11.13: The Applicant does not consider it necessary to secure BNG via a s106 agreement, because BNG is already proposed to be secured via the draft DCO (App Doc Ref 2.1) [REP1-003]. The Applicant acknowledges comments in other representations about how BNG is secured in the draft DCO. The Applicant is looking to update the draft DCO (App Doc 2.1) [REP1-003] to provide further clarity on BNG delivery and this will be provided at Deadline 3.</p>
12	6 – Land Quality and Contamination	<p>The Applicant welcomes the Council's agreement that the information within the ES Appendix 14.1 Preliminary Risk Assessment (App Doc Ref 5.4.14.1) [APP-122] is adequate at this stage to demonstrate that risks to construction workers, final end users and occupants of nearby residential and commercial properties, from ground conditions, are not likely to comprise a significant effect (paragraph 12.10) and that secondary mitigation measures contained within the CoCP are appropriate.</p>
13	7- Odour	<p>"Normal operating" conditions is when the WWTP is functioning normally, within its normal operational levels and tolerances. This considers seasonal and diurnal/daily variations associated with peak or low flows and loads. It is expected that the WWTP would operate under normal conditions all year, every year. Exceptional circumstances, which cannot be predicted and thus quantified, are addressed if and as they occur in line with ES Appendix 18.4 Preliminary Odour Management Plan (App Doc Ref 5.4.18.4) [AS-106], which includes mitigation on site of minor incidents and further action, e.g. notification of the Environment Health Officer (EHO), as appropriate to more severe incidents. To provide further information to the infrequency of exceptional circumstances, the odour complaints register for the Existing WWTP from 2014 to 2020 (info available at the time of report) was included in the odour impact assessment, namely 4No. abnormal events (e.g. emergency flare stack in use) in the period.</p>

Reference	Topic	Applicant's Response
		<p>The Applicant have used the abovementioned base information on the Existing WWTP to determine the operating conditions expected for the Proposed WWTP, combined with the fact that Proposed WWTP will be new and expecting to be outperform (or normally operating at worst), and the IAQM guidance that states "...odours from sewage treatment works plant operating normally, i.e. non-septic conditions, would not be expected to be at the 'most offensive' end of the spectrum (Table 5) and can be considered on par with 'moderately offensive' odours such as intensive livestock rearing." to select the odour assessment criteria for the Proposed WWTP: "moderately offensive".</p> <p>The Applicant highlight some of the information provided in relation to climate change and odour, as requested: The terminal pumping station and inlet works will be covered and air extracted and treated (odour controlled), to enable the risks of changes in influent characteristics due to lower rainfall, raising temperatures, etc. to be easily managed. Post these processes, the higher incoming water temperatures will result in better waste water treatment performance (treatment bacteria work faster at higher temperatures). Higher water temperatures will also result in more heat being available to harvest from the process, reducing the need for biogas to be used for process heat. Two degrees 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 WWTP performance will be managed in line with the Environmental Permit Regulations (EPR) and Industrial Emissions Directive (IED) permits issued to the Applicant by the Environment Agency for operation of the proposed WWTP. These permits will be in place before flows are introduced and commissioning begins. The concerns raised that commissioning would present different odour impacts can thus be funnelled through the same confidence as normal operation in permits, management systems, e.g. OMP and EHO oversight.</p> <p>The three "further" requirements were noted in item 13:3, namely:</p> <ul style="list-style-type: none"> • Outline Commissioning Plan • Odour modelling / further information would be beneficial to consider concentrated influent. • More detail on water, climate change.

Reference	Topic	Applicant's Response
		<p>The Applicant trust the above information provided above highlighting climate change considerations, which already forms part of the DCO application Odour Impact Assessment (DCO documents APP-138, AS-104) and Odour Statement (DCO doc APP-050), satisfies the considerations under items 2 and 3.</p> <p>Additionally, an Outline Commissioning Plan does form part of the DCO application (APP-071), for your consideration under item 1.</p> <p>We trust that the information provided and highlighted above would thus match the needs identified for “further” requirements and that no additional requirements are applicable in relation to odour.</p>
14	8 – Air quality impacts	<p>The Applicant agrees that an air quality management plan should be prepared as a Requirement of the DCO. Requirement 9(2) of the draft DCO (App Doc Ref 2.1) [REP1-003] confirms that any Construction Environmental Management Plan (CEMP) submitted for approval should be accompanied by an air quality management plan. Requirement 8(2) of the draft DCO (App Doc Ref 2.1) [REP1-003] states that documents submitted for approval must accord with the details specified in the Code of Construction Practice. Proposed air quality management measures are included within Section 7.8 of the Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [REP1-025] and, where necessary, further site specific air quality measures are set out in the Code of Construction Practice Part B (App Doc Ref 5.4.2.2) [REP1-027].</p>
15	9 – Noise and vibration	<p>the Applicant has considered further the Council’s position that s61 should be disappplied. The Applicant refers the Council to Article 9 which provides that where proceedings are brought under the Environmental Protection Act 1990 (section 82(1)), no order is to be made or fine imposed where the nuisance:</p> <p>(a) relates to premises used by the undertaker for the purposes of or in connection with the construction, or maintenance of the authorised development and that the nuisance is attributable to the carrying out of the authorised development in accordance with a notice served under section 60 (control of noise on construction sites), or a consent given under section 61 (prior consent for work on construction sites) of the Control of Pollution Act 1974; or</p> <p>(b) is a consequence of complying with a requirement of this Order and that it cannot reasonably be avoided;</p> <p>(note that only (a) and (b) are referred to above for relevance)</p>

Reference	Topic	Applicant's Response
		<p>The consequence of this is the defence in Article 9 will apply if the Applicant can show the nuisance was a result of complying with a Requirement, for example, the CEMP and therefore the Applicant does not need to use s61 to avail itself of a defence. Ultimately, this means that s61 is, in practical effect, not relevant for matters dealt with under the CEMP.</p> <p>For the sake of completeness, the Applicant also points out that pursuant to Article 48(2) of the DCO, save as otherwise provided by the DCO, Part 2 of Schedule 2 (discharge of requirements) is to have effect in relation to all consents, agreements, approvals or notices granted, refused or withheld in relation to the functions of the local authority set out in Sections 60 and or 61 of the Control of Pollution Act 1974.</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 to be submitted and approved alongside the Construction Environmental Management Plan (CEMP) which will include agreement of complaint notification procedure, community liaison and monitoring. This response is provided also to comment Noise and Vibration 77 within South Cambridgeshire District Council's Relevant Representation [RR-004] in the Applicant's Response to Relevant Representations (App Doc Ref 8.2) [REP1-078].</p> <p>The Applicant notes that a detailed response relating to the sensitivity of receptors is provided within the Applicant's response to ExQ1 18.6 (App Doc Ref 8.3) [REP1-079].</p>
16	10 - Lighting	<p>The Applicant acknowledges the reference to the relevant local planning policy for lighting Policy SC/9 of the SCDC Local Plan.</p> <p>16.8: Requirement 14 of the dDCO (App Doc Ref 2.1)[REP1-003] requires detailed construction lighting design strategies to be submitted to and approved by the relevant planning authority, the Applicant expects that the councils will work collaboratively and where needed consult one another in line with their responses to ExQ1 regarding working together to discharge requirements. Additionally, the Code of Construction Practice Part A (App Doc Ref 5.4.2.1)[REP1-025] provides for control of construction lighting (section 5.9) including relevant specifications (5.9.5).</p> <p>16.10: The Applicant assumes that although the suggested mitigation is set out under a construction heading that it relates to Gateway Building. The Applicant can confirm that the lighting mitigation suggested by SCDC is set out</p>

Reference	Topic	Applicant's Response
		<p>in Section 5.4 of the Lighting Design Strategy (App Doc Ref 5.4.2.5)[APP-072] (secured through Requirement 7 (Detailed Design) of the dDCO (App Doc Ref 2.1)[REP1-003]).</p> <p>16.15 Given the protections described above (Requirement 14 and the provisions of the Code of Construction Practice) the Applicant considers that monitoring would not be required and, given the predominantly rural location and distance from sensitive receptors, would not serve a useful purpose.</p>
17	11 – Public health	<p>The Applicant notes the comment regarding reporting of construction worker conduct, the Community Liaison Plan sets out that an Enquiries and Complaints Procedure will be developed for the construction period, this will include all enquiries and complaints being logged, investigated and responded to (App Doc Ref 7.8).</p> <p>The Community Liaison Plan will proactively inform the community and stakeholders of any works, or duration where it falls out of agreed working hours or poses obstruction to roads, PROWs, businesses, facilities or local infrastructure.</p> <p>The Applicant notes the comments regarding ensuring local jobs are prioritised for local people and advertising locally and creating opportunities for students and graduates of the Cambridge Regional College. The Applicant works with the Wisbech College of West Anglia on training and skills and will seek to link opportunities during construction with the college.</p> <p>The Applicant confirms that the ability to use the facility for education, skills and innovation is in line with the Applicant's company values. It provides an opportunity to raise awareness and education on the importance of the circular economy, the water life cycle and wider environment and sustainability issues. The Applicant already operates an extensive programme of engagement with schools and colleges. The Discovery Centre provides a new facility to house and enhance this programme of engagement. The Discovery Centre will be accessible via prior arrangement with schools, colleges and the wider community. The Applicant currently employs an Education Team who will lead on the education programme and the visits to the Discovery Centre. The management and commitment of the Discovery centre will delivered through Requirement 23 of the dDCO.</p> <p>The Applicant has a "Citizen Science" project which is a vital part of their 'Get River Positive' programme. It is designed to help us gain a better understanding of the river health in the region and engage more closely with local river groups and authorities.</p>

Reference	Topic	Applicant's Response
		<p>17.24 <i>Engagement with GRT community</i> : The Applicant has carried out proactive engagement with the Gypsy, Roma, Traveller (GRT) Community. A site visit was held 11 September 2020 alongside the South Cambridgeshire District Council's Gypsy and Traveller Liaison Officer and South Cambridgeshire District Councillor Hazel Smith to distribute community consultation leaflets and to answer questions about the project. . The Applicant has continued to notify the Gypsy and Traveller Liaison Officer at South Cambridge District Council, including most recently providing notice as per Section 56 of the Planning Act 2008. The Community Liaison Plan (App Doc Ref: 7.8, section 4.2) commits to proactive engagement with hard to reach groups. These groups will be contacted prior to commencement of the Community Liaison Plan to ensure that the approach taken best meets their needs. The Applicant will also engage with the Council's GRT Officer.</p> <p>17.26: Lighting proposals for the junction with Horningsea Road have been presented and discussed with the Local Highways Authority as part of the Technical Working Group for Transport and Traffic. As part of Requirement 7 (Detailed Design) of the draft DCO (App Doc Ref 2.1) highway design, which lighting proposals will form part of, will need to be submitted and approved before that phase of works can commence.</p> <p>17.28: As stated in our response to the councils relevant representation(RR-004) (Page 77/78 of the Applicants Response to Relevant Representations (App Doc Ref 8.2)[REP1-078]) 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 specific contractor. As stated in section 5.3.3 the CoCP Part A (App Doc Ref 5.4.2.1) [REP1-025], 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>17.30: Section 7 of the Construction Traffic Management Plan (App Doc Ref 5.4.19.7)[REP1-044] sets out how the Applicant proposes to monitor and enforce construction vehicle movements. Monitoring will predominantly be</p>

Reference	Topic	Applicant's Response
		<p>carried out by the Logistics Manager who, as part of their roles and responsibilities, will operate a scheduling system for all deliveries to manage and avoid the movement of HGV movements during the restricted periods. Any non-compliance will be enforced through the measures set out in Section 7.3 of the Construction Traffic Management Plan.</p> <p>17.31: As set out in the Applicants Response to Relevant Representations (Page 31, App Doc Ref 8.2)[REP1-078], 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.</p>
18	12 – Community impact	<p>As stated above, the Applicant has an Education Team that carry out site visits to its operational sites in order to explain how water and waste water is treated and also to provide wider education on the water cycle and the environment. For example in February 2023 the Education Team took Waterbeach Primary School on a visit to the existing Waste Water Treatment Plant at Cowley Road. It is also common for organisations and elected members such as councillors to have site visits to explain the water treatment process. The new Discovery Centre will provide a significant opportunity to enhance the education programme of the Applicant.</p> <p>18.12 The Applicant confirms that the temporary and permanent visitor centre will be managed through Anglian Water Education Team. A programme of scheduled visits will manage footfall. The management and delivery of the Discovery Centre will be delivered by Requirement 23 of the dDCO.</p> <p>18.13: The Applicant acknowledges the council's position and its opposition to a permissive path. The Applicant's default position, as presented in the application and the dDCO provisions, is for the link to have full public bridleway status. However, this is opposed by the relevant landowner, who would prefer a permissive status in order to better manage risks around anti-social behaviour. The Applicant is cognisant of its duties to seek a negotiated position in respect of any compulsory powers being sought and therefore is exploring this permissive option with the landowner. If a permissive path were to be secured, it would provide a similar level of access as a bridleway for a minimum of 30 years, with enforcement powers transferable to the County Council as highway</p>

Reference	Topic	Applicant's Response
		<p>authority. The Applicant believes that this would substantially deliver on the commitment to open up the path network. Discussions with both the landowner and County are ongoing.</p>
19	13 Public Rights of Way	<p>19.8: As set out on the Right of Way Plans (App Doc Ref 4.6)[REP1-018], with the exception of Footpath 85/6 which will be temporarily diverted through a land parcel adjacent to the original route all other PRoWs which intersect the Proposed Development will be gated in order for temporary diversions to be as close to the original alignment as possible and minimise disruption for users.</p> <p>19.11: Please refer to 18.13 above.</p>
20	14 Highways and transportation	<p>The Applicant believes it has provided a highways design and mitigation measures that reduces its impact on the local highway network in conjunction with the LPA and National Highways. With mitigations included within the CTMP and CoCP that reduce the amount of expected vehicle movements in peak hours by only allowing 'time critical' operations to be planned in this time. The Applicant describes critical activities as those activities that are vital to the successful completion of the developments programme that if not completed at that time or a duration or specific time in that working day will result in a critical delay to the end date or result in the Applicant missing a key delivery date of mitigation that will reduce either the temporary or permanent impact of the proposed development.</p> <p>The Applicant has defined the main critical activities as : major concrete pours including base slabs; abnormal load delivery including those escorted by the Police; and contract lifts, i.e., lifting of pieces of equipment on crane.</p> <p>Outside of these critical deliveries, the Applicant has sought to reduce the impact on the local road network by planning deliveries outside of the peak hours. These deliveries will be controlled by the Logistics Manager as described in 3.2 [AS-109] Construction Traffic Management Plan. 2.2.1, 4.2.5, 6.5.2, 6.6.1 of the [AS-109] Construction Traffic Management Plan outlines the principles of avoidance of the peak hours for HGV's.</p>

Reference	Topic	Applicant's Response
		<p>In addition to table 2-2 of Doc 5.2.19 [AS-038] the Applicant defines other 'time critical' operations as: operational and maintenance staff travelling to/from work; visitors (weekdays and out of peak only); office workers using the facility daily; deliveries (waste water and sludge, consumables) (7 days a week); cars travelling daily HGVs (in vehicle movements); liquid sludge imports; biosolid exports; non-routine tanker movements; septic waste movements.</p> <p>Construction "time critical" could be defined as staff travelling to / from work or office, deliveries of plant and materials, deliveries of aggregates, deliveries of equipment, deliveries liquid sludge imports, septic waste movements, deliveries of consumables, visitors.</p>
21	15 – Climate Resilience	<p>21.19: The Applicant confirms that they will be seeking to engage with SCDC during development of the detailed design regarding climate change mitigation measures and sustainable construction measures, which will be based on the design principles and objectives presented in application document 7.6 Design and Access Statement [AS-168]. The Applicant will also be submitting a statement by Deadline 4 to clarify how it is proposed to develop the detailed design to clearly demonstrate how the design accords with these design principles and objectives to support a request to discharge Requirement 7.</p>

Table 2-2: Cambridge City Council

Reference	Topic	Applicant's Response
4	Planning Policy	<p>In the context of its comments at paragraphs 4.3 - 4.5 on national planning policy and specifically the relevance of the NPSWW and NPSWRI, the Applicant agrees with the Council that even in the event that it is concluded that an NPS does not have effect but is relevant to a proposed DCO development, it would fall within the category of matters which are <i>“both important and relevant to the Secretary of State’s decision”</i>. In the Applicant’s opinion, this would certainly apply in this instance to the NPSWW (for the reasons set out in the Applicant’s responses to ExQ1- 2.2e) and f) REP1-079) but would not apply to the NPSWRI which, as set out at section 3.7 of the Planning Statement (App Doc Ref 7.5 - REP1-049) and the Applicant’s response to ExQ1 – 2.1 (REP1-079), is not relevant to waste water treatment and this particular application.</p> <p>In addition to the NPPF sections listed by the Council, the Applicant also considers section 6 ‘Building a strong, competitive economy’ and section 11 ‘Making effective use of land’ are of relevance as referred to in our response to ExQ1 – 2.19 (REP1-079).</p> <p>The Applicant notes that the document library of historic, current and emerging development plans, supplementary planning documents, relevant reports and supporting evidence at Appendix 1 of the Council’s LIR includes most of the documents referred to in Local Policy Context section (2.3) of the Applicant’s Planning Statement (App Doc Ref 7.5 - REP1-049). The documents not included are generally earlier draft versions of the NECAAP and now adopted Local Plans (e.g. the 2014 CNFE AAP Issues and Options and 2019 NECAAP Issues and Options Update Report, and the 2020 GCLP First Conversation Regulation 18 Issues and Options and supporting Sustainability Appraisal of Issues and Options December 2019). Since these have been overtaken by later documents, the Applicant is of the opinion that it is not necessary for the ExA to be provided with these documents which are referred to only for context. An extract of the Cambridgeshire and Peterborough Minerals and Waste Plan Site Specific Proposals Development Plan Document – Preferred Options December 2006 identifying Honey Hill (Site SSP15) has been separately provided in response to ExQ1-2.9 (REP1-079).</p>
6	1 Strategic Development Plan Context	<p>The significance of the HIF award as the ‘game changer’ referenced at paragraph 6.24 to finally enable the viability constraint for relocation to be overcome and for the long-held ambition for regeneration of the NEC area to be realised supports the response provided by the Applicant to ExQ1-2.11 (REP1-079) that this represents a material change in circumstance such that greater weight should now be placed on the draft</p>

Reference	Topic	Applicant's Response
		<p>NECAAP and emerging GCLP in this instance than would normally be the case having regard to the advice at NPPF paragraph 48.</p> <p>The specific significance of NEC in being able to substantially contribute to meeting housing needs and to support the continued strong growth of Cambridge as one of the UK's most important research and innovation-led employment hubs is clearly recognised by the Council at paragraphs 6.111 - 6.112. This is indeed the basis for the focus being given by Government to the realisation of the significant development opportunity which would be unlocked by the Proposed Development through the Cambridge 2040 initiative and, in particular, the creation of the Cambridge Development Group and the specific working group charged with accelerating the relocation of the existing WWTP (paragraphs 6.113 - 6.115). The planning benefits unlocked by the Proposed Development, and made deliverable by the HIF grant, are recognised as being 'substantial' in sustainable development terms (paragraph 6.116 - 6.117) and are separate and in addition to the benefits arising from the new WWTP set out at paragraph 2.2.17 of the Planning Statement – App Doc Ref 7.5 - REP1-049).</p>
7	2 Carbon	<p>The LIR notes at paragraph 7.5 that the alternative (less preferred) option of Combined Heat and Power (CHP) engines would result in a higher level of lifetime carbon emissions. At paragraph 7.28 similar reference is made to operational carbon emissions arising from the DM0/CHP configuration of the plant. ExA should note, however, that this operational carbon is mitigated by the Applicant's commitment to ensure operationally net zero (Requirement 21 of the dDCO), this commitment is not acknowledged in the LIR.</p> <p>The Applicant considers that the Council's position outlined at 7.17 in respect of the Code of Construction Practice and Construction Environmental Management Plan is disproportionate. The 70% target is aspirational and, while achievable, is not assessed in the Environmental Statement and is not a part of the application under consideration by the ExA. Reporting on construction carbon would form part of the detailed design requirements secured under DCO Requirement 7 which requires the approval of a Construction Method Statement for each phase, accompanied by an explanation as to how each phase accords with the Design Objectives in the Design and Access Statement. The Applicant will discuss with the Council the mechanism for simplified carbon reporting outside of the structures of the CoCP and CEMP, which are not suited to this task.</p> <p>In respect of paragraphs 7.18 and 7.19 (capital replacements), the Applicant can clarify that capital replacements cover the like for like replacement of assets that reach the end of their operational life within the assessment period e.g. concrete structures expected asset life of 60 years and M&E of 20 years, this is in</p>

Reference	Topic	Applicant's Response
		<p>addition to annual routine maintenance. The rationale for excluding these emissions from the operational phase is due to these emissions happening at given intervals throughout the assessment period and not on an annual basis. The scale, intensity and timing of these emissions can be found in Table 2-20 and 2-21 of Appendix 10.1 GHG Calculations [APP-109].</p> <p>The Applicant notes the Council's characterisation of operational impacts of both the DM0 and DCO as an adverse impact; however, ExA's attention is also drawn to paragraph 7.22 where it is acknowledged that emissions per megalitre of water are significantly reduced from the baseline of the existing treatment works, there is, therefore, a significant improvement in operational carbon performance.</p> <p>The Applicant notes the Council's assertions at 7.30 and 7.31 around securing of updated and accurate information through a further requirement in the DCO. The Applicant believes an additional requirement would be disproportionate and believes that the Outline Carbon Management Plan and the proposed Detailed Carbon Management Plan provide mechanisms to provide updated information related to carbon emissions. The Applicant continues to engage with the Council to agree how to communicate updates and how the Outline Carbon Management Plan could effectively be used to provide updates in the future. In relation to the requirements set out in 7.32, the Applicant continues to review how it may cover future decommissioning emissions and also future expansion requirements and continues to discuss this with the Council.</p>
8	3- Noise and vibration	<p>The Applicant notes that a response relating to the sensitivity of receptors is provided within the Applicant's Response to ExQ1 18.6 (App Doc Ref 8.3) [REP1-079].</p> <p>The Applicant notes that Requirement 9 of the dDCO (App Doc Ref 2.1) [REP1-003] secures the provision of a noise and vibration management plan to be submitted and approved alongside the CEMP which will include agreement of complaint notification procedure, community liaison and monitoring. This response is provided in response to comments Noise and Vibration 50 and 51 in Cambridge City Council's Relevant Representation [RR-002] in the Applicant's Response to Relevant Representations (App Doc Ref 8.2) [REP1-078].</p> <p>The Applicant notes that a response relating to the need for consent under Section 61 is provided within this document in response to a comment from South Cambridgeshire District Council.</p>

Reference	Topic	Applicant's Response
		<p>The Applicant notes that the Waste Water Transfer Tunnel Vent Stack and dosing facility located within the Existing Cambridge WWTP would not materially affect ambient noise and have therefore not been assessed. Assessment of operational noise impacts includes all relevant plant and equipment described within ES Appendix 17.4 Operational Noise Sources (App Doc Ref 5.4.17.4) [APP-136] that includes noise sources as part of the Proposed Development.</p> <p>Assessment of noise impacts on future residential receptors at the existing Cambridge WWTP and design of any relevant mitigation measures would need be completed by the housing developer in accordance with the Agent of Change principle. Assessment and mitigation design should consider all relevant prevailing ambient noise sources incident on proposed sensitive receptors. Ambient noise sources at this location primarily include road traffic noise using the A14 and surrounding road network, commercial and industrial noise sources and aircraft noise.</p>
9	4 Odour impacts	<p>The Applicant notes the comments at 9.17 – 9.23, focusing on the concerns for potential impacts (“... adverse impacts on amenity / quality of life and living conditions”), further specifically detailed to be in relation to odour impacts, associated with the permanent waste water transfer tunnel ventilation stack (WWTTVS -located at Shaft 1) on the future residential development at the NEC site.</p> <ul style="list-style-type: none"> The Applicant refers to the Project Description and Tunnel drawings with references as follow: APP-026 Anglian Water Services Limited 4.12 Design Plans - Sewage Tunnel and Longitudinal Sections REP1-021 Anglian Water Services Limited 5.2.2 Chapter 2 Project Description <p>The documents detail the location and height of the proposed WWTTVS. The drawings included in the NEC AAP do not pinpoint the WWTTVS. However, the Applicant confirms that the information has been made available for development of the proposed NEC AAP layouts.</p> <ul style="list-style-type: none"> The Applicant confirms that the future NEC AAP residential receptors have been considered in the odour impact assessment. The Applicant confirms that consideration for odour modelling of the WWTTVS concluded that it would not be a suitable tool for assessing the potential impacts due to the nature of the infrequent and unpredictable use of the vent stack. The interception shaft is a design feature that requires ventilation facilities. The Applicant has now discussed with the Council (in a meeting on 29 November 2023) the purpose of these facilities to clarify their function. The purpose of the ventilation facility is to allow air into the tunnel system and passively manage air pressure, 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 if and as these arise. Odour could be released via the vent stack

Reference	Topic	Applicant's Response
		<p>when air exits the tunnel system under extreme operating conditions, most likely a high rainfall event when larger quantities of waste water enter the tunnel displacing air out of the tunnel. As the process is passive, and dependent upon air pressure within the sewer, it is not possible to accurately predict frequency or duration of air released from the ventilation facility, only to acknowledge that odour could be released through the vent shafts and would be intermittent and short-lived. As odour modelling models a year's worth of information, the impact would be so insignificant that it would not be seen/visible using modelling as the tool for odour impact consideration. The Applicant has also shared images of a typical "vent stack" (in the meeting on 29 November 2023) to demonstrate that they are tall slim structures resembling lamp posts and do not have the visual intrusion previously envisaged.</p> <ul style="list-style-type: none"> • The Applicant would recommend a 15m separation buffer or 'cordon sanitaire' to the closest houses from vent stacks. Vent stacks already exist in the Cambridge catchment – similar in appearance to lamp posts, and can be located on streets or green spaces. • The applicant has not in the past had concerns associated with insufficient dispersion and dilution at high level with vent stacks of 10m height. However, consideration to maintain airflow around vents stacks would remain a requirement.
10	5 -Land Quality Impacts	<p>The Applicant notes that the City Council considers the contamination and land quality assessment briefly discussed within Chapter 14 of the Applicant's Environmental Statement [Doc ref 5.2.14] [AS-032] to be acceptable (paragraph 10.3) and that, unless excavated as part of the decommissioning works, the passing of liability of any contaminated soils left in-situ to LandsecU+I/TOWN as the developer of the vacated existing WWTP site is 'standard procedure' (paragraph 10.4).</p> <p>The Applicant notes and agrees with the Council's statement at paragraph 10.11 that soil contamination will need to be remediated to a standard suitable for any intended future use through the planning process, which the Council considers will lead to a betterment in the local environment. As stated by the Applicant in response to ExQ1-2.30, LandsecU+I/TOWN as master developers have commissioned a Preliminary Risk Assessment of the WWTP site which considers that it is unlikely that the site would be classified as Contaminated Land under Part 2A of the Environmental Protection Act (EPA) 1990. Contamination risk is therefore considered to be manageable, both technically and commercially. In this context, the Council's comments endorse the Applicant's own in, for example, its responses to EXQ1-2.23 and 2.32 that the Proposed Development (supported by the HIF award) will fully enable the delivery of a 42 hectares brownfield site capable of accommodating 5,500 new homes, 23,500 m² new business space and 13,600 m² new shops local services, community, indoor sports and</p>

Reference	Topic	Applicant's Response
		cultural facilities and release a further 35 hectares of land for regeneration 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.
11	6 – Air quality impacts	The Applicant notes the comments received in relation to air quality and has nothing further to add to Cambridge City Council's commentary.
12	7- Public Health	<p>The Applicant notes the comments and responds to specific points as follows: 12.15 – 12.17, as the Applicant responded to WQ 7.36 Document Reference REP1-079 Anglian Water Services Limited 8.3 Response to ExA's ExQ1, everything the Applicant achieves as a business is through its people and partners. Apprentices and graduates have long been the lifeblood of Anglian Water. The Applicant is committed to continuing to provide employment opportunities associated with all of our infrastructure schemes, including the delivery of the new Waste Water Treatment Plant for Greater Cambridge.</p> <p>The Applicant's early careers programme for graduates, apprentices and interns helps to build its workforce of the future. The Applicant has made full use of our allocation of the Government apprenticeship levy, with a focus on areas where employment opportunities have been limited. In 2022/23 the Applicant employed 63 apprentices, its highest-ever number, alongside eight graduates. Through the Applicant's @One Alliance (which are its partners who help deliver the infrastructure programme), it has a Training School that includes a nine-week development programme for people with little or no experience of working on a construction site. At the end of the programme the individuals will be upskilled and be ready to work permanently as part of one of the Applicant's site teams. Candidates come from a wide range of backgrounds including military leavers, ex-offenders; students not successful on other programs and we work with DWP, Jobs 22 and local charities. The Applicant works across the entire region with educational bodies, charities and local government to promote these opportunities widely. The Applicant also has a STEM (Science Technology Engineering Maths) initiative to work in our communities to promote Anglian Water, Anglian Water Alliances and the STEM opportunities that the business can offer, specifically seeking to inspire the next generation of young people to join Anglian Water and our infrastructure alliances.</p> <p>The Applicant's recruitment team will be happy to work with Cambridge City Council regarding the local advertisement of job opportunities and with Cambridge Regional College regarding opportunities for their graduates.</p>

Reference	Topic	Applicant's Response
		<p>Regarding 12.27 and 12.28, the Applicant has carried out proactive engagement with the Gypsy, Roma, Traveller (GRT) Community. A site visit was held 11 September 2020 alongside the South Cambridgeshire District Council's Gypsy and Traveller Liaison Officer and South Cambridgeshire District Councillor Hazel Smith to distribute community consultation leaflets and to answer questions about the project. . The Applicant has continued to notify the Gypsy and Traveller Liaison Officer at South Cambridge District Council, including most recently providing notice as per Section 56 of the Planning Act 2008. The Community Liaison Plan (App Doc Ref: 7.8, section 4.2) commits to proactive engagement with hard to reach groups. These groups will be contacted prior to commencement of the Community Liaison Plan to ensure that the approach taken best meets their needs. The Applicant will also engage with the Council's GRT Officer.</p>
13	8- Community Impact	<p>The Applicant notes the concern raised at 13.13 and refers to the response provided above in response to 9.17 – 9.23.</p>
14	9- Highways and Transport	<p>The Applicant notes the policy context set out at 14.1 and can confirm it has submitted a Transport Assessment and Travel Plan setting out the impact of the proposed development and proposed mitigation.</p> <p>The Applicant notes the comment at 14.6 and has prepared a Cumulative Effects Assessment (AS-045, App Doc Ref: 5.2.22 ES Chapter 22, Section3.9) that sets out the impacts of demolition of the Cambridge WWTP</p> <p>The Applicant notes all other points have been deferred to Cambridgeshire County Council in their role as the Highways Authority.</p>

Table 2-3: Cambridgeshire County Council

Reference	Topic	Applicant's Response
	Planning Policy	<p>Section 2 of the LIR sets out the policy background which the Applicant broadly agrees with save for the reference in paragraph 2.3 to the National Policy Statement for Water Resources Infrastructure. This NPS concerns water supply and resources and is not relevant to this project for the reasons set out in section 3.7 of the Planning Statement (App Doc Ref 7.5 - REP1-049).</p> <p>A number of other local strategies are referenced such as CCC's Climate Change and Environment Strategy 2022 and the Cambridgeshire Green Infrastructure Strategy 2011. It is important to note that whilst these have been considered as part of this project and are variously referenced in the technical chapters of the Applicant's Environmental Statement (App Doc Ref 5.2), they do not form part of the development plan.</p>
	1 Waste Management Specific Policies	This section correctly identifies Policy 11 as the relevant policy for new wastewater treatment plants which sets out relevant criteria for such a proposal. It is considered that the project meets these criteria.
Impacts by Issue		
	2 Agricultural land and soils	<p>The Applicant notes the comment in paragraph 6.8. The Applicant does not consider that auger borehole samples of the Waterbeach Pipeline, final effluent pipeline, the outfall and waste water transfer tunnel connection are required. This approach is in line with the Scoping Report (App Doc Ref 5.4.4.1) [APP-079] and Scoping Opinion (App Doc Ref 5.4.4.2)[APP-080]. As acknowledged in the Applicants Response to Relevant Representations (App Doc Ref 8.2) [REP1-078] the majority of these assets will not affect soil quality at the surface because they are permanent below ground assets and long sections of these elements will be installed by horizontal directional drilling and tunnelling. Land located above these assets will be reinstated to agriculture following construction. The Applicant therefore considers that the mitigation measures in the Outline Soil Management Plan (App Doc Ref 5.4.6.3) [REP1-078] are sufficient to manage effects.</p>
	3 Biodiversity	In response to paragraphs 5.16-5.18, the Applicant provided a draft Outline Water Quality Monitoring Plan (App Doc Ref 5.4.20.3) [REP1-046] at Deadline 1. This document provides the approach to monitoring and

Reference	Topic	Applicant's Response
		<p>locations, which includes Black Ditch, and relates to both construction dewatering activities, and operation. The Outline Water Quality Monitoring Plan was approved without further changes from the Environment Agency and has been resubmitted at Deadline 2. The final approach to monitoring will be agreed through Requirement 22 of the draft DCO (App Doc Ref 2.1) [REP1-003]. The Applicant believes that adequate mitigation measures to protect all surface water and ground water features are set out in section 7.5 of the CoCP Part A (App Doc Ref 5.4.2.1) [REP1-025].</p> <p>In response to paragraph 5.20, the Applicant has provided information on the compensation habitats in relation to the River Cam County Wildlife Site within an updated ES Appendix 8.13 Biodiversity Net Gain Report (App Doc Ref 5.4.8.13) provided at Deadline 2. This includes provision of reedbed compensation within a new ditch network created within Works No. 39 and information on reedbed habitats to be provided at and near the outfall location.</p> <p>In response to paragraph 5.22, the Applicant has updated the text to reflect that the magnitude is minor (rather than as moderate as previously stated), which results in a slight adverse effect (not significant). This is reflected in an updated ES Chapter 8: Biodiversity (App Doc Ref 5.2.8) provided at Deadline 2.</p> <p>In response to paragraph 5.23, the Applicant has updated the Outline Outfall Management and Monitoring Plan (App Doc Ref 5.4.8.24) and provided at Deadline 2. In addition, the updated ES Appendix 8.13 Biodiversity Net Gain Report (App Doc Ref 5.4.8.13) provided at Deadline 2 includes detail in relation to Works No. 32 and 39, which include the habitats associated with and that are within the River Cam CWS.</p> <p>In response to paragraphs 5.24 to 5.26, the Applicant provided a response in respect to veteran trees as part of ExQ1 5.51 and 14.11 (App Doc Ref 8.3) [REP1-079].</p> <p>In response to paragraph 5.27, the Applicant has provided a plan within the updated ES Appendix 8.13 Biodiversity Net Gain Report (App Doc Ref 5.4.8.13) provided at Deadline 2, which provides information on the location of the proposed water vole compensation ditches, as well as those provided for habitat compensation and biodiversity net gain. The Applicant does not envisage a need to trap and translocate (as outlined in the Water Vole Natural England Ghost Licence Method Statement (App Doc Ref 5.4.8.22) [APP-107]) with displacement methodologies only. The compensation ditches within Works No. 39 will be provided</p>

Reference	Topic	Applicant's Response
		<p>prior to works affecting water vole habitats commencing, to support continuous habitat availability for water voles during works.</p> <p>In response to paragraph 5.28, the Applicant outlines in paragraphs 7.2.47-7.2.50 of CoCP Part A (App Doc Ref 5.4.2.1) [REP1-025] that a Reptile Mitigation Strategy will be prepared by the contractor prior to works commencing, and this strategy will be agreed by the local authority ecologist. The CoCP Part A (App Doc Ref 5.4.2.1) [REP1-025] does not provide detail on possible mechanisms to avoid potential double-handling of animals during translocations, with this detail to be provided as part of the agreed Reptile Mitigation Strategy.</p> <p>In response to paragraph 5.30, the Applicant acknowledges the comments about how BNG is secured in the draft DCO. The Applicant is looking to update the draft DCO (App Doc 2.1) [REP1-003] to provide further clarity on BNG delivery and this will be provided at Deadline 3. The Applicant believes that BNG delivery can be secured through the draft DCO and that s106 is not needed.</p> <p>In response to paragraph 5.32, the Applicant provided a draft Outline Water Quality Monitoring Plan (App Doc Ref 5.4.20.3) [REP1-046] at Deadline 1. This document provides the approach to monitoring and locations, as well as the protocol for appropriate remediation should this be required. The Outline Water Quality Monitoring Plan was approved without further changes from the Environment Agency and has been resubmitted at Deadline 2.</p> <p>In response to paragraph 5.33, the mitigation measures for works in relation to the outfall are contained within the Outline Outfall Management and Monitoring Plan (App Doc Ref 5.4.8.24) and ES Appendix 8.13 Biodiversity Net Gain Report (App Doc Ref 5.4.8.13), both of which have been updated and provided at Deadline 2.</p> <p>In response to paragraph 5.34, the Applicant provided a response in respect to veteran trees as part of ExQ1 5.51 and 14.11 (App Doc Ref 8.3) [REP1-079].</p> <p>In response to paragraph 5.35 and 5.61, the Applicant provided a response in relation to the provision of an expanded Landscape, Ecological, Recreational Management Plan (LERMP) in its response to ExQ1 5.11 (App Doc Ref 8.3) [REP1-079].</p>

Reference	Topic	Applicant's Response
		<p>In response to paragraph 5.37, the Applicant refers to its response to ExQ1 5.29 (App Doc Ref 8.3) [REP1-079].</p> <p>In response to paragraph 5.39, the Applicant refers to its response to paragraph 5.23 above.</p> <p>In response to paragraphs 5.42, 5.47-5.51 and 5.62, the Applicant has provided a response in relation to impacts relating to recreational pressures, in particular to Stow-cum-Quy SSSI, within its Response to Relevant Representation (App Doc Ref 8.2) [REP1-078].</p> <p>In response to paragraphs 5.45 and 5.58, the Applicant has provided a response in relation to lighting impacts upon Low Fen Drove Way Grasslands and Hedgerows County Wildlife Site within ExQ1 5.6 (App Doc Ref 8.3) [REP1-079].</p> <p>In response to paragraphs 5.47 and 5.59, the Applicant has provided a response to ExQ1 5.6 (App Doc Ref 8.3) [REP1-079], in relation to the opportunities for enhancement, which includes reference to the commitment within ES Appendix 8.14 LERMP (App Doc Ref 5.4.8.14) [AS-066] that the Applicant will create <i>“new semi-improved neutral grassland to buffer the CWS, providing an opportunity to expand the CWS. This habitat creation and subsequent management ensures that there is no shading or encroachment of the existing CWS habitats. Furthermore, habitat management (scrub clearance to restore semi-improved neutral grassland and unimproved calcareous grassland) will help to improve the condition of the CWS.”</i></p> <p>In response to paragraphs 5.53 to 5.54, the outfall structure size and river bank protection requirements have been informed using a detailed hydraulic model as described in ES Appendix 20.7 Outfall CFD Report (App Doc Ref 5.4.20.7) [APP-157], which has been used to inform the engineering requirements to distribute the flow to the river, to control scour of the riverbed and erosion of the river bank either side of the outfall. Table 5-2 (final row) in the outline Outfall Management and Monitoring Plan (OMMP) (App Doc Ref 5.4.8.24) submitted at Deadline 2 provides a requirement for the detailed operational OMMP to include monitoring measures in relation to the operation of the outfall during extreme storm events, with triggers for further actions being should scour be compromising river bank protection or habitat quality. The detailed OMMP will be prepared prior to operation, and once it has been approved by the relevant planning authority.</p> <p>In response to paragraphs 5.55 and 5.60, the Applicant refers to its response to paragraph 5.23 above.</p>

Reference	Topic	Applicant's Response
		<p>In response to paragraph 5.56, in addition to the response provided above related to lighting assessment, the Applicant will submit a detailed lighting plan to Natural England to accompany the bat licence application post DCO consent. This document will provide the detail on operational lighting required, will outline mitigation and how this is secured, in line with best practice guidance (including ILP/BCT guidance).</p> <p>In response to paragraph 5.57, the Applicant has provided a plan within ES Appendix 8.13 Biodiversity Net Gain Report (App Doc Ref 5.4.8.13) at Deadline 2, which provides information on the location of the proposed water vole compensation ditches, as well as those provided for habitat compensation and biodiversity net gain. This includes management and monitoring activities to be carried out in line with a Natural England licence, and as a requirement for BNG.</p>
	4 Carbon	<p>The Applicant paragraph 6.5 on the suitability of the baseline used. The application has presented a baseline of an alternative project design aligned to option B) in the IEMA guidance aligned to a like for like rebuild of the existing WRC design. Whilst an alternative baseline could be presented highlighting the impact of upgrading the existing WWTP and/or Waterbeach WRC , neither of these would achieve the outcomes laid out in the Strategic Carbon Assessment, as they would require redevelopment of homes elsewhere. The Strategic Carbon Assessment does provide an assessment of emissions against an scenario where the Proposed Development is not built and the existing site is upgraded.</p> <p>The Applicant notes paragraph 6.6 in relation to coverage of construction waste disposal. The capital carbon assessment in the application covers A1-A5 lifecycle modules, also referred to as a Cradle-to-built asset boundary. This assessment does make allowance for waste generation and typical disposal distances for construction waste, such as, surplus excavated material, materials wastage.</p> <p>The Applicant notes paragraphs 6.7 - 6.9 and 6.27. The application as described and assessed in the Environmental Statement represents a high standard of design in respect of carbon emissions and is compliant with national and local planning policy and is aligned with relevant carbon budgets set under the Climate Change Act 2008. It delivers a significant reduction in construction carbon and will be net zero operationally (in either the DM0 or biomethane exporting configuration). The design as assessed is secured through DCO Requirement 7 which requires the approval of a Construction Method Statement for each phase,</p>

Reference	Topic	Applicant's Response
		<p>accompanied by an explanation as to how each phase accords with the Design Objectives in the Design and Access Statement. The Applicant will engage further with the County on the issue of the reporting of construction carbon reporting.</p> <p>The Applicant acknowledges the comments in relation to the gross emissions in paragraphs 6.12, 6.13 and 6.15. The Applicant acknowledges gross emissions being higher for the Applicants preferred option. The Applicant has taken a systems view for the scheme in supporting national and regional decarbonisation and the provision of biomethane has substantial benefit in supporting regional and national decarbonisation of difficult to decarbonise heating and industrial sectors.</p> <p>In regard to the consideration of grid decarbonisation in paragraph 6.16. The Applicant acknowledges it has presented a single year operational impact in Table 4-4, this was to provide the worst case position in terms of when gross emissions are highest. The Applicant confirms that the whole life emissions assessment in in ES Chapter 10: Carbon (App Doc Ref 5.2.10) [APP-042] does account for UK grid decarbonisation projections.</p> <p>The Applicant notes paragraph 6.17 stating the lack of existing plant baseline within the assessment. The Applicant highlights that the Strategic Carbon Assessment (App Doc Ref 7.5.2) [APP-206] provides an assessment of an alternative scenario of upgrading the existing plant in comparison to the proposed relocation. which shows this would be 74% lower emissions than the Proposed Development when considered in isolation. However, as stated in the Strategic Carbon Assessment, there are wider emissions impacts and benefits to be considered beyond the WWTP development alone.</p> <p>The Applicant acknowledges the comment on the uncertainty of the carbon value of displacing natural gas from the gas grid in paragraph 6.19. The Applicant acknowledges these uncertainties and has understood them. In the event of future restrictions in gas export into the grid it will consider alternative investment to utilise the biogas/biomethane in a sensible way. Options could include liquifying or compressing the biomethane for export by tanker ('virtual pipeline') for use elsewhere, or using it as a vehicle fuel for refilling AWS sludge import vehicles. Technologies for converting biomethane to hydrogen are also being developed and may be technically viable and cost effective to use at the site in the longer term. These alternatives would be assessed for viability at a time in which restrictions are feasibly likely to come into place, which is not considered likely in the mid-term.</p>

Reference	Topic	Applicant's Response
		<p>The Applicant notes paragraphs 6.20 to 6.23 relating to the gross emissions impact of the site. The Applicant acknowledges the comment on greater consideration on actual gross emissions, however, considers this is not aligned to best practice carbon management in infrastructure as set out by PAS2080:2023. This proposes infrastructure and the built environment should consider systems level emissions and how projects impact wider systems emissions and not just those associated with projects in isolation. The Applicant acknowledges the long term uncertainty of the benefits of gas export but in line with the UK energy strategy is confident there will be a long term demand for green gas, and the Applicant understands the alternative uses for green gas in the long term to continue to support regional and national decarbonisation.</p> <p>The Applicant notes the comment on potential to further reduce operational Greenhouse Gas emissions through increasing renewable generation output in paragraph 6.24. The Applicant notes this and is committed to optimising renewable generation potential on the site through future design stages.</p> <p>In respect of landscape management (paragraphs 6.25 and 6.26), maintenance and management are already fully embedded in the LERMP - see pages 45-69 of AS-066.</p>
	5 Health	<p>The Applicant notes that a detailed response relating to the assessment of operational noise impacts due to emergency generators is provided within the Applicant's Response to ExQ1 18.19 (App Doc Ref 8.3) [REP1-079].</p> <p>The Applicant notes that the Waste Water Transfer Tunnel Vent Stack and dosing facility located within the Existing Cambridge WWTP would not materially affect ambient noise and have therefore not been assessed. Assessment of operational noise impacts includes all relevant plant and equipment described within ES Appendix 17.4 Operational Noise Sources (App Doc Ref 5.4.17.4) [APP-136] that includes noise sources within the Proposed WWTP.</p> <p>Assessment of noise impacts on future residential receptors at the Existing Cambridge WWTP and design of any relevant mitigation measures would need be completed by the housing developer in accordance with the Agent of Change principle. Assessment and mitigation design should consider all relevant prevailing ambient noise sources incident on proposed sensitive receptors. Ambient noise sources at this location primarily</p>

Reference	Topic	Applicant's Response
		include road traffic noise using the A14 and surrounding road network, commercial and industrial noise sources and aircraft noise.
	6 Historic Environment	The Applicant notes the County Council's comments on archaeological mitigation in paragraph 8.7 and 8.17. The overarching archaeological mitigation strategy will be set out in the Archaeological Investigation Mitigation Strategy (AIMS) as set out in Requirement 13 of the draft DCO (App Doc Ref 2.1) [REP1-003] . This will detail the archaeological mitigation requirements (techniques and areas) that will be required. Due to the nature of the archaeological remains identified during the application process (through trial trenching and geophysical survey), where necessary flexibility will be built into the mitigation strategy through the AIMS requirements. The process for managing and consenting the changes to scope will be set out in the AIMS.
	7 Land Quality and Contamination	The Applicant notes the comments received in relation to land quality and contamination. For the reasons set out at paragraphs 4.2.2 - 4.2.21 of ES Chapter 14: Land Quality (App Doc Ref 5.2.14) [AS-032] , the (worst case) impact of the Proposed Development on mineral resources and to each MSA is negligible and, as set out in the Applicant's response to ExQ1 15.11, the re-use and management of minerals extracted on site is secured through Requirement 9 of the draft DCO (App Doc Ref 2.1) [REP1-003] . The Applicant notes the County Council's support (in its response to ExQ1-15.10 - REP1-134) to the proposal to make use of excavated material within the project. The Applicant considers that the Proposed Development is, therefore, consistent with criterion (i) of Policy 5 which requires that the mineral can be extracted where practicable prior to development and, having regard to the extent of mineral resource affected, this quantity of affected material could not otherwise be economically extracted and would not prejudice future extraction of the mineral in the majority of the MSAs (noting Policy 5 criteria (j) and (k)).
	8 Landscape and visual amenity	In paragraphs 10.16 - 10.17, the County Council states that it should approve requirement 9 but that the definition of 'relevant planning authority' refers only to the district planning authorities. The Applicant refers to the response to Written Question 10.12 which should address this point. For ease, the Applicant confirms that it has amended the definition of relevant planning authority to:

Reference	Topic	Applicant's Response
		<p><i>“relevant planning authority” means the waste authority from time to time for the area within which the relevant part of the authorised development is to be constructed, used, or maintained, or power under this order is to be exercised;</i></p> <p>Should the County Council want to consult with the highway officers it can choose to do so. This is not prohibited by the drafting of the Requirements. The Applicant does not consider it necessary to direct who the County Council should consult with in these requirements and the County Council has previously confirmed to the Applicant that it consults on a case by case basis with whomever it considers relevant to the issue at hand.</p> <p>The Applicant notes from paragraph 10.18 that the County Council requires that all works which would have the effect of altering the highway network, including PROW, should be subject to an agreement with the County Council under the Highways Act 1980. The Applicant provided a detailed response on the operation of Part 3 (Street Works) within the DCO at Written Question 10.16. The County Council will be aware that since the first hearings, the Applicant has transposed the County Council’s standard section 278 agreement into the format of the protective provisions. This includes an amendment to the definition of ‘specified works’ to:</p> <p><i>‘any highway works, any street works carried out pursuant to articles 10 and 11 in Part 3 of this Order which are within a highway maintainable at the public expense and signalisation authorised by this Order’</i></p> <p>Further, the Applicant has amended Article 14 to provide that accesses which join a highway maintainable at the public expense must be completed in accordance with the protective provisions in Schedule 15</p> <p>In relation to PROW in particular, the Applicant reiterates that there is only one new proposed PROW which would operate, in common with other local rural bridleways, as a public route across land using the existing track surface and therefore it does not agree that a Highways Act agreement is required.</p> <p>In response to paragraph 10.20, the Applicant refers to Written Question 10.16 where it is stated that the detail of the closures sought by the Applicant is already contained within the DCO Schedule and so it isn’t considered that a programme is required. If a PROW is to be closed which has not been identified, this must be agreed with the highway authority (as per article 13(1)(b)). As to a signage strategy, Section 5 of the</p>

Reference	Topic	Applicant's Response
		<p>Community Liaison Plan details the scope of the notifications to be sent out to community members and stakeholders and on PROWs in particular states:</p> <p><i>5.1.1 Communications will aim to provide a complete narrative of what is happening in project locations. For example, what the construction “package” of works looks like in a particular location. This information will include:</i></p> <ul style="list-style-type: none"> • <i>Inform on public rights of way management (PRoW) measures, including diversions and alternative routes.</i> <p>A detailed Community Liaison Plan is to be provided as part of the Construction Environmental Management Plan (“CEMP”) in accordance with Requirement 9.</p> <p>Further, the Code of Construction Practice states suitable signage and barriers for diversion routes will be provided. As per 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.</p> <p>Finally, the Construction Traffic Management Plan (which forms part of the CEMP to be provided pursuant to Requirement 9) states that ‘current proposals for route signage include...signage warning pedestrians and cyclists of the presence of HGVs and other site traffic’. This will be relevant to all affected PROWs, bar</p> <p>The Applicant considers that the above documents adequately address informing members of the public of the closures and diversions. The Applicant also notes that the County Council will be the relevant planning authority for the purpose of approving the above-mentioned requirements.</p>
	<p>9 Material resources and waste</p>	<p>The Applicant notes the comments received in relation to material resources and waste. For the reasons set out at paragraphs 4.2.2 - 4.2.21 of ES Chapter 14: Land Quality (App Doc Ref 5.2.14) [AS-032], the (worst case) impact of the Proposed Development on mineral resources and to each MSA is negligible and, as set out in the Applicant's response to ExQ1 15.11, the re-use and management of minerals extracted on site is secured through Requirement 9 of the draft DCO (App Doc Ref 2.1) [REP1-003]. The Applicant notes the County Council's support (in its response to ExQ1-15.10 - REP1-134) to the proposal to make use of excavated material within the project. The Applicant considers that the Proposed Development is, therefore, consistent</p>

Reference	Topic	Applicant's Response
		<p>with criterion (i) of Policy 5 which requires that the mineral can be extracted where practicable prior to development and, having regard to the extent of mineral resource affected, this quantity of affected material could not otherwise be economically extracted and would not prejudice future extraction of the mineral in the majority of the MSAs (noting Policy 5 criteria (j) and (k)).</p>
	10 Odour	<p>The Applicant refers to its response in this document to South Cambridgeshire District Council's comments on odour in their Local Impact Report above.</p>
	11 Transport and traffic	<p>In response to paragraph 13.35, the Applicant refers to its response at 8 above and to Written Question 10.12 which confirms that the definition of relevant planning authority has been amended to refer to 'the waste authority' which will therefore be the County Council.</p> <p>The Applicant has responded to the point raised at 13.36 in its response to Written Question 10.6. The Applicant stated there that 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>In response to paragraph 13.37, the Applicant does not consider such an agreement necessary as section 59 of the Highways Act 1980 is not disapplied by the DCO.</p> <p>Paragraph 13.38 has largely been responded to as part of the response to Written Question 10.6. Street works remain subject to the provisions of ss54-106 of the 1991 Act including any related requirements to give notice and this is confirmed in the DCO at Article 10(3).</p> <p>In response to 13.39, the Applicant refers to Written Question 10.6 and confirms that the definition of 'specified work' in the protective provisions now includes express reference to Articles 10 and 11. Article 10 has been amended to refer to the protective provisions.</p> <p>The Applicant does not consider that Article 12 should be made expressly subject to the protective provisions. This concerns temporary closures of streets and is regulated by Article 12 itself, namely the consent of the</p>

Reference	Topic	Applicant's Response
		<p>relevant street authority is required in relation to any closure and the street authority may attach conditions to that approval. The protective provisions concern the management and carrying out of physical works and therefore is not considered relevant to matters of closure only.</p> <p>Paragraph 13.40 has also largely been responded to as part of Written Question 10.6. For ease, the Applicant reiterates that there is only one proposed, new PROW. Where works are carried out to an existing PROW and which are authorised by the Order, if the PROW is a highway maintainable at the public expense, it will fall within the definition of 'specified works' within Part 6 of the protective provisions.</p> <p>As above, paragraph 13.41 was also addressed as part of the response to Written Question 10.6. In particular, Article 14 was amended to confirm that works to create a permanent access are subject to the protective provisions (where such permanent access joins a publicly maintainable highway) and therefore design details will need to be approved as part of the "specification and the approved drawings" (as defined within the protective provisions). In relation to existing accesses, it is proposed that this is regulated by Article 14 and therefore the approval of works to such accesses will be via the making of the DCO. If the County Council has a concern with an access listed in Schedule 7, the Applicant would welcome a discussion with the County Council.</p> <p>With regards to accesses not expressly referred to in Schedule 7, laying out new accesses or improving or maintaining existing accesses within the Order limits must be approved by the relevant planning authority (and therefore the relevant waste authority) in consultation with the relevant highway authority. The County Council therefore has the right of approval to such works.</p> <p>As to paragraph 13.42, the Applicant considers that this has been addressed by the re-drafting of the protective provisions to align with the County Council's precedent section 278 agreement. The Applicant would be grateful if the County Council could confirm.</p>
	12 Water resources	<p>Construction Phase Impacts: 14.7 (& 14.8): Details of the proposed procedures and measures to be implemented during construction to manage sediment from being discharged into the surrounding water environment are set out in Section 7.5 (Paragraph 7.9) of the Code of Construction Practice (CoCP) Part A (Doc 5.4.2.1) [APP-068]. Further details are</p>

Reference	Topic	Applicant's Response
		<p>included in Sections 3.1, 3.2, 3.3, 3.4 and 3.5 (Topic Area – Water Quality) of the CoCP Part B (Doc 5.4.2.2) [AS-161].</p> <p>Operational phase Impacts:</p> <p>14.11 (& 14.16): The drainage strategy [APP-162] sets out details for surface water management and includes measures to accommodate excess surface water, from any source (including groundwater near the surface, that may emerge), to avoid flooding. The Drainage Strategy (para 3.2.4) states that “All drainage design is to be based on a 1 in 100-year storm event with +40% allowance for climate change”. A summary of the drainage strategy is provided (in para 4.12) with details of the drainage and attenuation facilities and outlet controls.</p> <p>14.12 (& 14.17): The drainage strategy [APP-162] confirms (in para 3.2.2), that runoff from potentially contaminated areas of the STC will be collected and returned to the inlet works for treatment, as this is a requirement of the Industrial Emissions Directive (IED). The project description [APP-34] provides details (in para 2.3.13) of the pumping capacity (7000l/s) of the Terminal Pumping Station (TPS) and of the storm storage provisions (20,400m³ including 5,000m³ within the tunnel). The drainage strategy [APP-162] provides details (in Table 4-1) of the contaminated areas in the proposed WWTP, which amounts to 36% (or 7ha) of the 19.6ha WWTP site. The runoff (from the 7ha area), that may be re-routed to the works, is of a much smaller magnitude (than the 7000m³/s capacity of the TPS); this is demonstrated in the drainage strategy, for example in para 4.2.2, where it is stated that provisions (to return the potentially contaminated runoff to the head of the works) currently includes a 50l/s pump set (several orders of magnitude less than the flow capacity of the works).</p> <p>14.13 (& 14.18): The drainage strategy [APP-162] sets out the areas that are considered to have either permeable or impermeable surfaces (see Figure 4.1 and Table 4-1) and additionally the areas which are considered to be classified as either un-contaminated or potentially contaminated. There is no intention to cause adverse impacts on the surrounding water environment (by increasing the discharge rates according to the area classifications); this is demonstrated in the aim of this document (in para 2.1.5): “The aim is that the strategy should be acceptable to the key Water Management Authorities, including the Lead Local Flood Authority (LLFA), and that it demonstrates compliance with appropriate standards”. The impermeable areas are clarified in the drainage strategy [APP-162]. This document also sets out the drained area and demonstrates that the provisions to avoid an influx of surface water into the receiving water body (see Appendices A, B and C).</p>

Reference	Topic	Applicant's Response
		<p>14.14 (& 14.19): The drainage strategy [APP-162] sets out (in para 4.8.3), in response to statement G12, details of the Rainwater Harvesting system (RWH) including the drainage (of the RWH system) to a storage facility and consideration of overflow as follows: "Any overflow from the RWH system will be self-contained, and may be drained via a soakaway to ground, and if this is not feasible it will be diverted to the main clean drainage system for the site". The RWH tanks will therefore not be used to provide attenuation, as it is acknowledged that the RWH tanks could be full and may therefore overflow on occasion into the main drainage system as intended in the strategy.</p> <p>14.15 (& 14.20): The Design and Access Statement [AS-168] refers (in para 2.12.1) to the drainage of the access road including the use of appropriately designed swales to accommodate the required hydraulic capacity. Swales are shallow flat bottomed vegetated open channels designed to convey, treat, and attenuate surface water runoff. Further details of the drainage arrangements of the access road are provided in application document 4.11 Design Plans - Highways and Site Access [APP-025] which includes the surface water drainage plan for the proposed WWTP site access and Horningsea Road junction (drawing 9809-rev C01) with details of the proposed swale connected to the access road and the attenuation facility which controls the discharge at the outlet (connecting the proposed swale to the existing receiving surface water drainage system). Swales are a well know form of Sustainable Drainage system (SuDs) and are commonly used in the drainage arrangements for roads. Published industry-standard guidance procedure will be followed to design the Swale system, such as The SuDS Manual CIRIA 753 which is referenced (see para. 7.1.2, Ref. 6) in the drainage strategy [APP-162].</p> <p>Draft DCO & Works Plans:</p> <p>14.21: The detailed Construction Environmental Management Plans (CEMP) for each phase as set out in the draft CEMP (Doc 5.4.2.7) [AS-057] will be developed through collaboration with the relevant stakeholders and be submitted to the relevant planning authorities for approval prior to the commencement of the associated phase in line with the draft Development Consent Order, Schedule 2, Requirement 9 (Doc 2.1) [AS-010]. The CEMP relating to water quality will set out mitigation measures to address the volumes of water anticipated at each phase and location.</p>

Get in touch

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

<https://infrastructure.planninginspectorate.gov.uk/projects/eastern/cambridge-waste-water-treatment-plant-relocation/>