

Cambridge Waste Water Treatment Plant Relocation Project
Anglian Water Services Limited

Applicant's Responses to Written Representations

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1 Introduction

1.1 Purpose of this document

- 1.1.1 This document provides Anglian Water Services Limited (the Applicant) responses to the written representations (WRs) submitted at Deadline 1 for the Cambridge Waste Water Treatment Plant Relocation Project (CWWTPRP).
- 1.1.2 The Applicant recognises the importance of the Written Representations and understands that the Examining Authority must have regard to any representations submitted.
- 1.1.3 The Applicant is aware that it has already set out its view on many relevant and important issues in response to questions from the Examining Authority, participation at hearings and submission of other documents etc. Therefore, the Applicant considers that there would be little benefit in this document in setting out at length matters which it has already addressed elsewhere. However, there are matters raised in some of the Written Representations that the Applicant does wish to respond to.
- 1.1.4 Accordingly, the Applicant has taken the following proportionate approach to commenting on Written Representations:
- it does not attempt to provide a comprehensive commentary on the detailed contents of all the points made in a Written Representation. Rather it provides a response on matters the Applicant considers the Examining Authority (and others) would benefit from understanding;
 - where matters have moved on from those described in the Written Representation, 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 Written Representation fully or fairly – 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 oral submissions at recent hearings and in responses submitted at Deadline 1 to Relevant Representations and ExQ1.
- 1.1.5 Each section of the tables that follow in this document responds to a specific Written Representation, responding at a high level to the matters raised followed by any key issues specifically.

- 1.1.6 The Tables are split by Written Representations from Statutory Consultees, followed by non-Statutory Consultees.

2 Applicant's Response to Written Representations

2.1 Statutory Consultees

Table 2-1: Cadent Gas

Reference	Topic	Applicant's Response
1	Introduction	The Applicant notes Cadent has interests in the following parcels shown on the Land Plans (App Doc Ref 4.4) [REP1-016]: 001a, 001b, 001c, 011a, 036a, 036b, 036c, 036d, 036e, 036f, 037a, 037b, 037c, 037d. The Applicant can confirm these are all noted in the Book of Reference (App Doc Ref 3.3) [REP1-011]. The Applicant can confirm it will not be interfering with those rights.
2	Regulatory Protection Framework	<p>The Applicant notes the requirement for compliance with the following.</p> <ul style="list-style-type: none"> a) CD/SP/SSW/22 Cadent's policies for safe working in the vicinity of Cadent's Assets. b) ICE (Institution of Gas Engineers) recommendations IGE/SR/18 Edition 2 Safe Working Practices to Ensure the Integrity of Gas Pipelines and Associated Installations. c) the HSE's guidance document HS(G)47 Avoiding Danger from Underground Services. <p>In addition, protective provisions will be in place for an appropriate level of control and assurance that the industry regulatory standards will be complied with in connection with works in the vicinity of Cadent's Apparatus. The Applicant continues to engage with Cadent gas to secure agreement on the protective provisions sought.</p>
3	Protective Provisions	The dDCO [REP1-003] contains specific Protective Provisions for the protection of Cadent. The Applicant continues to actively engage with Cadent to seek to agree that all the outstanding issues on the Protective Provisions are addressed to their satisfaction to ensure adequate protection for their Apparatus and that Protective Provisions consistent with their standard terms are provided.

Table 2-2: Network Rail Infrastructure Limited

Reference	Topic	Applicant's Response
	Land rights	<p>The Applicant acknowledges the comments from Network Rail Infrastructure Limited (NR) regarding the rights sought to be compulsorily acquired from NR include New Rights, Temporary Possession, Restrictive Covenants and Acquisition of Subsoil (together the Acquiring Rights) and that NR objects to the use of the Acquiring Rights to deliver the development. The Applicant is in active discussions with NR to seek agreement where necessary.</p> <p>The Applicant notes the requirement for a private agreement to regulate the manner in which rights over NR property are to be granted and in which works are to be carried out in order to safeguard NR's statutory undertaking. The Applicant continues to actively engage with NR on any necessary mitigation proposals required and prior approval requirements for the detailed design and construction stages.</p>
	Construction Phases	<p>The Applicant notes the requirement for a private agreement to regulate the manner in which rights over NR property are to be granted and in which works are to be carried out in order to safeguard NR's statutory undertaking. The Applicant continues to actively engage with NR on any necessary mitigation proposals required and prior approval requirements for the detailed design and construction stages.</p>
	Protective Provisions	<p>The Applicant and NR are in active discussions about the effects of the DCO in general and the Protective Provisions sought by NR and will continue to liaise to address all outstanding matters.</p>

Table 2-3: Natural England

Reference	Topic	Applicant's Response
Table 1, Issue 1	HRA	The Applicant refers to its response to ExQ1 5.60. The HRA Screening Report (App Doc Ref 5.4.8.15) has been updated to reflect that Eversden and Wimpole Woods SAC is screened in and will be taken through to the Appropriate Assessment stage within ES Appendix 8.16 Habitats Regulations Assessment Report (App Doc Ref 5.4.8.16). These updated documents have been provided at Deadline 2.
Table 1, Issue 2a	Stow-cum-Quy Fen SSSI recreational pressure	The Applicant has responded to similar comments raised in Natural England's Relevant Representation [RR-015] in the Applicant's Responses to the Relevant Representations (App Doc Ref 8.2) [REP1-078].
Table 1, Issue 2b	Black Ditch water quality monitoring	The Applicant submitted a draft Outline Water Quality Monitoring Plan at Deadline 1 (App Doc Ref 5.4.20.13) [REP1-046]. This has been reviewed and accepted by the Environment Agency and will be submitted as a final version at Deadline 2.
Table 1, Issue 2c	Monitoring & mitigation strategy and CEMP	The Applicant notes the response regarding the draft Outline Water Quality Monitoring Plan (App Doc Ref 5.4.20.13) [REP1-046]. The Applicant confirms that a Draft Outline Water Quality Monitoring Plan was submitted at Deadline 1. Since that submission, the Environment Agency have confirmed that they are satisfied with the proposals within this. The Applicant has therefore submitted the Outline Water Quality Monitoring Plan at Deadline 2 and looks forward to Natural England comments on this document. The purpose of the draft CEMP is to set out the structure that the detailed CEMPs will take, as stated in Issue Specific Hearing 1 the Code of Construction Practice is to be regarded in the same way as an Outline CEMP. As noted in the Applicants Response to Relevant Representations (App Doc Ref 8.2)[REP1-078] and the Applicants Response to ExQ1 (App Doc Ref 8.3)[REP1-079] the commitments outlined in the Code of Construction Practice Parts A & B (App Doc Ref 5.4.2.1 & 5.4.2.2)[REP1-025 & 027] will be transposed into the relevant detailed CEMPs and where required developed further prior to submission and approval as part of the discharge of requirements.
Table 1, Issue 2d	Groundwater monitoring	The Applicant submitted a draft Outline Water Quality Monitoring Plan at Deadline 1 (App Doc Ref 5.4.20.13) [REP1-046]. This has been reviewed and accepted by the Environment Agency and will be submitted as a final version at Deadline 2.
Table 1, Issue 2e	Wilbraham Fen SSSI groundwater	The Applicant submitted a draft Outline Water Quality Monitoring Plan at Deadline 1 (App Doc Ref 5.4.20.3) [REP1-046]. This has been reviewed and accepted by the Environment Agency and will be submitted as a final version at Deadline 2.

Reference	Topic	Applicant's Response
Table 1, Issue 2f	Downstream flood levels	The updated River Cam Urban model has been recently supplied by the Environment Agency. Hydraulic modelling is being rerun, and the FRA will be updated with new results shared with the Environment Agency and a revised FRA will be submitted at Deadline 3.
Table 1, Issue 2g	Water resources	The Applicant directs Natural England to the Applicant's response to RR-015 Part II, Table 1, Issue 2 in the Applicant's Response to Relevant Representations (App Doc Ref 8.2 4.10) [REP1-078].
Table 1, Issue 3a	Water vole & bat licences	The Applicant thanks Natural England for their response and confirmation that ghost water vole and bat licence applications are suitable subject to amendments to be included in the formal licence application submission. The Applicant refers to its response to ExQ1 5.60 and will await feedback from Natural England on whether the updated HRA Screening Report (App Doc Ref 5.4.8.15) and ES Appendix 8.16 Habitats Regulations Assessment Report (App Doc Ref 5.4.8.16). The Applicant does not consider that these updates necessitate any changes to ES Appendix 2.3 Lighting Design Strategy (App Doc Ref 5.4.2.5) [APP-072].
Table 1, Issue 3b	Badger licence	The Applicant thanks Natural England for their response.
Table 1, Issue 3c	Entire scheme species mitigation	BNG for the proposed outfall onto the river Cam is secured through Requirement 10(6)(e) of the draft DCO (App Doc Ref 2.1) [REP1-003], which states that the detailed Outfall Management and Monitoring Plan submitted for approval must include proposals for the provision and maintenance of 20% BNG comprising river units. Construction of the outfall is not programmed to happen in year 1 of construction, hence the reference to the flood risk activities permit being submitted in year 2 of construction.
Table 1, Issue 3d	Duration of species mitigation management	The Applicant acknowledges the comments about how BNG is secured in the draft DCO. The Applicant is looking to update the draft DCO to provide further clarity of reporting in relation to BNG delivery and this will be provided at Deadline 3.
Table 1, Issue 4a	BNG Metric submission	The Applicant thanks Natural England for their response.
Table 1, Issue 4b	20% river unit BNG proposal submission	The Applicant thanks Natural England for their response.

Reference	Topic	Applicant's Response
Table 1, Issue 5a	Detailed ALC survey for entire area	The Applicant thanks Natural England for their response and awaits further feedback from their specialist advisor. The Applicant would welcome the opportunity for a meeting with Natural England to discuss any points further.
Table 1, Issue 5b	Soil reuse	The Applicant thanks Natural England for their response and awaits further feedback from their specialist advisor. The Applicant would welcome the opportunity for a meeting with Natural England to discuss any points further.
Table 1, Issue 5c	RR Appendix 1 soil comments	The Applicant thanks Natural England for their response and awaits further feedback from their specialist advisor. The Applicant would welcome the opportunity for a meeting with Natural England to discuss any points further.
Table 1, Issue 7a	Access enhancement impacts	The Applicant has responded to similar comments raised in Natural England's Relevant Representation [RR-015] in the Applicant's Responses to the Relevant Representations (App Doc Ref 8.2) [REP1-078]. The Applicant will look to discuss these matters further with Natural England when developing the SoCG.
Table 1, Issue 7b	LERMP for entire scheme	The Applicant has responded to similar comments raised in Natural England's Relevant Representation [RR-015] in the Applicant's Responses to the Relevant Representations (App Doc Ref 8.2) [REP1-078]. The Applicant will look to discuss these matters further with Natural England when developing the SoCG.
Table 1, Issue 7c	Additional documents	The Applicant has responded to similar comments raised in Natural England's Relevant Representation [RR-015] in the Applicant's Responses to the Relevant Representations (App Doc Ref 8.2) [REP1-078]. The Applicant will look to discuss these matters further with Natural England when developing the SoCG.
Table 1, Issue 7d	Nature Recovery Network	The Applicant has responded to similar comments raised in Natural England's Relevant Representation [RR-015] in the Applicant's Responses to the Relevant Representations (App Doc Ref 8.2) [REP1-078]. The Applicant will look to discuss these matters further with Natural England when developing the SoCG.
Table 1, Issue 7e	Partnership approach	The Applicant has responded to similar comments raised in Natural England's Relevant Representation [RR-015] in the Applicant's Responses to the Relevant Representations (App Doc Ref 8.2) [REP1-078]. The Applicant will look to discuss these matters further with Natural England when developing the SoCG.
Table 1, Issue 7f	WTBCN & EA	The Applicant has responded to similar comments raised in Natural England's Relevant Representation [RR-015] in the Applicant's Responses to the Relevant Representations (App Doc Ref 8.2) [REP1-078]. The Applicant will look to discuss these matters further with Natural England when developing the SoCG.

Table 2-4: Historic England

Reference	Topic	Applicant's Response
2.13-2.14	Impacts of the Development	<p>The Applicant acknowledges Historic England's summary of the development in paragraph 2.13.</p> <p>The Applicant disagrees with the description of the landscape in 2.14, as wholly open and arable in character. The land within the Order Limits and to the north has this character, however, the landscape to the south includes the A14 trunk road (immediately south of the Proposed Development) and the north-eastern residential and commercial fringes of Cambridge.</p>
2.15-2.16	Impacts from construction	<p>The Applicant acknowledges Historic England's summary of the impacts from construction in paragraph 2.15 and is in agreement with Historic England that mitigation measures proposed go some way to reducing negative effect as stated in paragraph 2.16.</p>
2.17-2.19	Permanent impacts from facility – post construction	<p>The Applicant acknowledges Historic England's summary of the impacts from the presence of the facility post-construction in paragraphs 2.17 and 2.18.</p> <p>The Applicant disagrees with the description of the landscape character as 'fenland'. The Proposed Development is situated on chalkland fen-edge landscape, on a subtle hill and has differing historical development to fenland to the north. The character of the landscape to the north is arable, open and flat, but to the south is dominated by the A14.</p> <p>The Applicant agrees with Historic England paragraph 2.19 that the Proposed Development will alter the character of this landscape, including through the creation of a bund and introduction of tree planting that will alter the character of the area. This is reflected in the assessment of impact to Historic Landscape, which identifies impact to the historic landscape character area on Honey Hill, as reported within ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) [REP1-023]. The Applicant also agrees that long views east of Biggin Abbey will be altered, as reported within ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) [REP1-023].</p>
3.1	Policy Context	<p>The Applicant acknowledges Historic England's summary of the policy context in paragraph 3.1. The Applicant also notes that the Environmental Statement has been prepared in relation to the National Policy Statement for Waste Water (NPSWW).</p>

Reference	Topic	Applicant's Response
4.1-4.4	Conclusion	<p>The Applicant acknowledges Historic England's concluding points. The Applicant agrees that harm to the designated heritage assets highlighted by Historic England is less than substantial. 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. In the context of that harm, the justification for the Proposed Development and the public benefits that will arise from it are set out in sections 2.1 to 2.2 and considered in section 4.10 of the Planning Statement (App Doc Ref 7.5) [REP1-049].</p>

2.2 Local Planning Authorities

Table 2-5: Cambridge City Council

Reference	Topic	Applicant's Response
1-3	Summary	The Applicant notes that the Council's Written Representation is a brief summary of comments provided in its Relevant Representation and covered in detail in its Local Impact Report. The Applicant as therefore not duplicated responses here.

Table 2-6: Cambridgeshire County Council

Reference	Topic	Applicant's Response
N/A	N/A	The Applicant notes that the Council's Written Representation is a brief summary of comments provided in its Relevant Representation and covered in detail in its Local Impact Report. The Applicant as therefore not duplicated responses here.

Table 2-7: East Cambridgeshire District Council

Reference	Topic	Applicant's Response
3.12	Future capacity	<p>The Applicant notes that in summary the Proposed Development delivers a long-term public benefit and there is minimal impact on the residents within East Cambridgeshire. They further note that mitigation and the monitoring is an important part of making the scheme acceptable.</p> <p>At 3.12, the Applicant responds to the comment: <i>The big question is will this be able to support the growing population of the area for a significant time, and can it have some flexibility to enable more waste to be treated, without relying on other sites coming forward in the future? It is important to ensure that the scheme can deliver and be sustainable for the future.</i></p> <p>The Applicant confirms that the new facility will support a growing population in its catchment. Specifically, please see our response to ExQ1, 1.24 which states that the Proposed Development will be able to</p>

Reference	Topic	Applicant's Response
		accommodate anticipated flows into the 2080s and 2090s by expansion, modification, enhancement and optimisation of the WWTP infrastructure within the earth bank. See also response to ExQ1 2.21, 6.25, 14.8.

Table 2-8: South Cambridgeshire District Council

Reference	Topic	Applicant's Response
1-3	Summary	The Applicant notes that the Council's Written Representation is a brief summary of comments provided in its Relevant Representation, responses to ExQ1 and covered in detail in its Local Impact Report. The Applicant as therefore not duplicated responses here.

Table 2-9: Fen Ditton Parish Council

Reference	Topic	Applicant's Response
		<p>The Applicant notes that Fen Ditton Parish Council's Written Representation expands on the issues raised in their Relevant Representation (RR-006) and points raised at Open Floor Hearing 1 and Issue specific Hearings 1 and 2.</p> <p>The Applicant has responded to these points, please see Document Reference REP1-078 Anglian Water Services Limited 8.2 Applicant's Response to Relevant Representations, Table 3-6 and REP1-082 Anglian Water Services Limited 8.6 Post Hearing Submission, Table 1-1, Table 1-2.</p> <p>The Applicant note the additional comments regarding the drainage strategy [APP-162] and agreement to the proposals within it. The Applicant notes the comment regarding the potential risk of contamination of the Black Ditch. The Applicant considers any potential risk of contamination to the Black Ditch is adequately covered in the Water Quality Monitoring Plan (App Doc Ref 5.2.20.13) [REP1-046].</p> <p>The Applicant will consider the stakeholder's request to be included, as a consultee, within the Community Liaison Plan [AS-132].</p>

Table 2-10: Teversham Parish Council

Reference	Topic	Applicant's Response
		<p>The Applicant notes the comments made by Teversham Parish Council which summarise issues the Applicant responded to in its response to Relevant Representations (see table 3-5 in Applicant's Response to Relevant Representations) (App Doc Ref 8.2) [REP1-078].</p> <p>In relation to the comments made by the stakeholder on the adequacy of surveys and modelling, the Applicant refers to its response to ExAQ1.20.78 and ExAQ1.20.79 [REP1-079].</p> <p>The Applicant notes the stakeholder's comments regarding the need for the Proposed Development and the relevancy of the Local Plan. The Applicant refers the stakeholder to the updated Planning Statement (App Doc Ref 7.5) [REP1-049].</p> <p>The Applicant notes the comments regarding the carbon impact of decommissioning the existing Cambridge WWTP and refers to ExAQ1.6.16 [REP1-079].</p>

2.3 Non-Statutory Consultees

Table 2-11: Save Honey Hill Group (SHH)

Reference	Topic	Applicant's Response
Section 3 Principle of the Development		
3.1 - 3.4.9	Principle of the Development - general comments	The Applicant disagrees with the position taken by SHH and also with the characterisation of what was presented at the Issue Specific Hearings. Rather than repeating those points we refer to the responses given on these points at the hearings as summarised in the Applicants Document 8.6: Post Hearing Submission, specifically Table 1-3, 2.1 (REP1-082) and the Applicant's response to ExQ1-2.3 (REP1-079) as supported by the Applicant's Legal Submission on the Applicability of S104 and S105 Planning Act 2008 (App Doc Ref 7.15) [AS-126].
3.2.1	Whether s.104 or s.105 of the Planning Act 2008 ("PA 2008") applies	<p>On the specific point made at 3.2.1, the Applicant referred in the hearing to its Legal Submission on the Applicability of Section 104 and Section 105 of the Planning Act 2008. This states that, and without prejudice to being able to pursue the point in further cases, the Applicant does not seek to make the point that the project meets the threshold in Section 29 in relation to these proposals and that it is not necessary to do so. The Secretary of State must determine whether either s104 or s105 applies and then 'have regard' to the matters listed in the relevant section. It is the Applicant's opinion that the NPSWW has effect in this instance because of the terms of the s35 Direction dated 18 January 2021 stating that the project is "<i>nationally significant</i>" (noting footnote 6 in NPSWW paragraph 1.2). In this case, the NPSWW is the primary basis for making the decision on the Proposed Development and the Secretary of State must, therefore, decide the Application in accordance with that NPSWW noting that none of the exceptions in Sections 104(4) to (8) apply.</p> <p>The Applicant's Legal Submission on the Applicability of S104 and S105 Planning Act 2008 (App Doc Ref 7.15) [AS-126] breaks down the approach to s104 and s105. In the event that the Secretary of State determines that s105 applies, it is the Applicant's position that the NPSWW is a matter which is both important and relevant to the Secretary of State's decision. The Applicant does not accept the assertion that the primary consideration when determining the application should be the adopted development plan. Unlike the requirements under s38(6) of the Planning and Compulsory Purchase Act 2004 and s70 of the Town and Country Planning Act 2008, s105 requires only that the Secretary of State must "<i>have regard to</i>" the matters listed under that section. In principle, this allows the Secretary of State to apply greater or lesser weight to matters (for example, in the NPSWW or any LIR). In this instance, a highly material consideration is in respect of the consequential benefits that would be enabled by the vacation of the existing WWTP site in NEC releasing the potential for its future redevelopment to provide much needed homes, jobs and a wide range</p>

Reference	Topic	Applicant's Response
		<p>of community, cultural and open space facilities (including a community garden and food growing spaces, indoor and outdoor sports facilities) as envisaged in the Draft NECAAP and emerging GCLP (see the Applicant's responses to ExQ1-2.2 and 2.15 - REP1-079). The weight that should be given to those benefits is substantial, taking into account the support provided by the HIF award, the contractual arrangements in place to ensure delivery and the support provided in the draft NECAAP and emerging GCLP to the realisation of those benefits (despite those development plans not yet having progressed to adoption).</p>
3.3.1	Scope of proposed development	<p>The Applicant re-states its position that the office space sought in the dDCO is associated development, as confirmed in the Applicant's responses to ExA's written questions, Document Reference 8.3 (REP1-79) at 1.17 and 1.25.</p>
3.4.2 - 3.4.7	Scope of entire project	<p>The Applicant does not agree with the interpretation of the scope of the project set out in Save Honey Hill's Written Representation.</p> <p>The Project, which enables the potential for the existing site for housing delivery, and the subsequent delivery of the housing itself are two clearly separate and distinguishable projects. The relationship between these two projects was set out in the application documents and was further discussed in the Applicant's Responses to the Examining Authority's Written Questions (1.18(a) - (f) of REP1-079).</p>
3.4.8	Cumulative Effects Assessment	<p>On the specific point made about the cumulative assessment, in the Applicant's response to the Examining Authority's Written question 1.18 (REP1-079) it was explained that the redevelopment of the existing Cambridge WWTP site, including full decommissioning and demolition activities outside of the scope of the DCO, and was included within the "other developments" long-list of the cumulative effects chapter (see lines 18, 19 and 21 of Table 2-6 at page 26 of AS-044).</p> <p>The level of information on the redevelopment of the existing Cambridge WWTP in the cumulative assessment represents what is available to the Applicant at the current time. It is consistent with Advice Note 17, which acknowledges that limited information will be available. In particular, attention is drawn to paragraph 3.1.4 of the Advice Note which states that the Planning Inspectorate acknowledges that the availability of information necessary to conduct the CEA will depend on the current status of the other development and paragraph 3.4.3 which recommends that in these Tier 3 instances, the applicant should aim to undertake an assessment where possible, although this may be qualitative and at a very high level. The Applicant considers it reasonable to conclude that the PINS guidance is intended to comply with the relevant legislative provisions and therefore that in complying with the Advice Note it is meeting the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.</p>

Reference	Topic	Applicant's Response
		<p>At 3.4.8 SHH cite case R (Finch) v Surrey County Council [2022] EWCA Civ 187 at para.15(6). The Applicant does not consider that the Finch case is relevant because it has made an assessment of the cumulative effects as is noted by SHH. In reality, SHH are disputing the adequacy of that assessment as opposed to whether an assessment has been undertaken, and in relation that point the Applicant refers to the previous paragraph.</p>
3.4.9	Rochdale envelope	<p>At 3.4.9 SSH contend that there are “errors and inconsistencies in the way in which powers to deviate and parameters are defined in the dDCO” and “significant environmental effects which are clearly not assessed”.</p> <p>The Applicant does not consider that there are any inconsistencies and confirms that the reasonable worst case (including any micro-siting or deviation authorised under Article 6 of the dDCO) has been assessed in the Environmental Statement. The Applicant notes that the comments it has received from SHH outside of the examination on the dDCO raised similar issues and will respond to those more fully when submitting an updated dDCO at Deadline 3.</p>
Section 4 Need for Relocation		
4.2	Introduction	<p>The Applicant notes the comments relating to need for relocation which are summarised in SHH's RR (RR-035) at Section 4, pp.5-11 and at SHH 013 Summary of oral submissions at ISH 2, paras.2.17-2.26). The need for the Proposed Development is set out in detail in the Planning Statement (App Doc Ref 7.5 - REP1-049) and the Applicant refers to its additional comments on this matter in response to SHH's RRs at 4.1.- 4.4 of REP1-078. As stated in the response to ExQ1-2.19 - REP1-079) need for WWTP relocation is best described as a need to deliver a vacated site in accordance with the terms of the HIF award and a strategic development need for the site to be redeveloped to deliver a new low-carbon city district making a key contribution to the development of Cambridge, supporting growth in the economy and making an important contribution to meeting government housing objectives (consistent with the objectives at sections 6 and 11 of the NPPF). The regional and national significance of this has been recognised in the SoS (DEFRA) s.35 direction (18 January 2021) and its importance elevated by the announcement by the Prime Minister and the Secretary of State for Levelling Up, Housing and Communities on 24 July 2023 to 'supercharge' Cambridge. Release of the existing WWTP site will enable regeneration and the creation of a highly sustainable new city district delivering 8,350 homes (40% affordable), 15,000 new jobs and a wide range of community, cultural and open space facilities (including a community garden and food growing spaces, indoor and outdoor sports facilities) on a brownfield site</p>

Reference	Topic	Applicant's Response
		within the urban area of Cambridge which is recognised as “the most sustainable location for strategic scale development available within Greater Cambridge”.
4.3.1	Emerging Greater Cambridge Local Plan and NECAAP	The assertion that very little (if any) weight should be given to the emerging plans is not accepted and ignores the very particular circumstances of this application and its rationale (particularly in light of the HIF award). The weight the Applicant considers should be given to these emerging plans is ‘substantial’ as addressed in response to ExQ1-2.11. South Cambridgeshire District Council and Cambridge City Council, for the reasons set out in their respective responses, consider it to be ‘considerable’ [REP1-140 and REP1-129 respectively].
4.3.2	Impact of Water Supply issues on weight to be given to emerging policy	Reference to the difficulty currently being experienced by planning applications as a result of the water supply issues raised by the Environment Agency do not support the assertion that reduced weight should be given to the spatial strategy in emerging policy. The impact of the Water Supply issue is addressed in the responses provided to ExQ1-21.58 (see, for example, REP1-079 , REP1-129 and REP1-140). The statement in the Development Strategy Update (Regulation 18 Preferred Options) report approved on 6 February 2023 confirming a clear position on NEC as one of three key strategic sites takes account of the Water Supply issue. That issue does not affect the Proposed Development. The timescales involved in potential delivery of future housing on the vacated existing WWTP site are such that any solution is unlikely to prevent or materially delay that outcome, particularly now given the focus of the Water Scarcity Working Group, as covered in the responses to ExQ1-21.58 and addressed in South Cambridgeshire District Council’s LIR at paragraph 6.71 (REP1-139).
4.4.4	Enabling Need	As noted at 2.20.6 of the Applicant’s Post Submission Hearing to ISH2 (REP1-082), whilst there is nothing within the NPSWW which specifically supports enabling development, there is also nothing in the NPSWW which prevents a demonstration of need on a different basis to the need effectively specified by inclusion in the NEP.
4.5	Retention of works on current site	The Applicant notes the extensive information provided by SHH at paragraphs 4.5.1 - 4.5.9. The Applicant believes that this section is not relevant to the Application under examination and notes that: (a) the test for Green Belt release under the NPPF (cited at paragraph 4.5.1) relates to plan level decision making and so is incorrectly applied here. ExA should have regard to the relevant project level tests set out at section 3.4 of the NPSWW, and; (b) the background on other projects does not constitute relevant information on alternatives for the purposes of the EIA Regulations. Consolidation on site using alternative technologies and approaches, such as those outlined by SHH in these paragraphs, did not form part of the formulation of the project taken forward for the HIF award process. There

Reference	Topic	Applicant's Response
		<p>is, therefore, no "material omission" (second paragraph 4.5.1). The alternatives considered by the Applicant are described in Chapter 3 of the Environmental Statement, as discussed further in the Applicant's responses to questions 2.26-2.29 of the Examining Authority's Written Questions (REP1-079).</p> <p>The Applicant can provide legal commentary on the relevant tests for alternatives set out in the NPSWW if requested by ExA.</p>
4.6	Technology and design standards	<p>The Applicant notes SHH's observations in respect of technology options and design standards and the extensive information provided at paragraphs 4.6.1 to 4.6.8.</p> <p>The technology choices described by the Applicant, including those in the Environmental Statement Project Description and the Design and Access Statement, balance multiple criteria including affordability, carbon emissions and the environmental criteria set out in the NPSWW, including good design, against which the application should be examined. The project which the Applicant has applied for will be a "modern, low carbon water recycling centre", a description which is consistent with the application documents.</p>
4.6.13	Technology and design standards	<p>SHH asked that the Applicant provide details of any other steps taken, apart from the abandonment of trickling filters in favour of ASP, to reduce odour as part of the information to be provided about recent improvements.</p> <p>The Applicant has over various business plan periods updated aspects of the existing facility which, while not principally driven by odour reduction, have had a positive impact on odour. Examples include: sludge tanks which were covered and odour controlled some years ago, before the decommissioning of A and B streams, which did significantly improve odour from the site. Improved automatic desludging of the primary tanks has also had a positive impact on odour. Ferric dosing for Phosphorus removal is another example.</p> <p>The Applicant has embedded a number of odour mitigation measures to reduce odour emissions from the proposed WWTP that are outlined in the Design and Access Statement [AS-168] sections 7.6, 9.4, 9.8 as well as throughout the document.</p> <p>In addition to the design elements mentioned in the DAS [AS-168] the Applicant has also secured measures in the Preliminary Odour Management Plan [AS-106] sections 2.3, 3.4 & 3.5.</p>
4.7.1 – 4.7.14	Odour Safeguarding/	<p>The Applicant notes the points and refers to responses provided to this topic in ExQ1, Document 8.3, questions 2.9; 2.29; 2.32. In response to specific points raised the Applicant responds as follows:</p>

Reference	Topic	Applicant's Response
	Encroachment Policies	<p>(1) The Environment Agency Guidance and National Planning Policy recommendations for planning stage is to use separation/buffer distances/'safeguarding area' from the site to limit impacts, e.g., potential negative odour impacts, from the start (high level). Planning applications also include odour impact assessments to show expected impact inside and outside of this zone/'safeguarding areas' (detail level). Once a site is established, developments that apply to encroach on these zones/'safeguarding areas' are managed through risk assessments, including odour impact assessments. There are two separate measures involved: (1) <u>distance</u>, for guidance and ease of managing and securing planning (considers all impacts, e.g., odour, noise, safety, etc.), and (2) <u>odour</u>, for which separate and very specific guidance exists for planning (and subsequently operation). In the case of the Proposed Development, the Applicant has designed the plant to ensure "negligible" odour impact to all relevant receptors.</p> <p>(2) The Applicant would like to highlight that the existing waste water treatment plant and the Proposed Development site odour maps are not comparable, as described in detail in the Odour Impact Assessment. Some of the differences include surface characteristics (urban vs green belt setting), differences in the treatment processes and their configuration on site, items odour controlled, etc. Even if the existing waste water treatment plant were to be built at the new location, the new odour maps would differ to historic results. Comparison of odour maps are thus incompatible. Only odour emission values can be transferred/re-used, where the same treatment processes are repeated.</p> <p>(3) The Applicant highlighted the various different previous odour emission surveys to contextualise the values used in the Odour Impact Assessment, highlighting differences in season of these surveys and its impact on the results. The Applicant does not believe this "questions the integrity of the results provided within the 2018 Odournet UK Ltd/ 2020 Olfasence UK Ltd (Odournet) reports."</p> <p>(4) Anglian Water's existing policy follows industry practice to introduce a 400m consultation zone for Water Recycling Centres through local policy to require further evidence to analyse potential impacts for any future development. Anglian Water has reviewed making these zones more specific to each Water Recycling Centre based on their size and catchment and following an assessment of processes undertaken and potential receptors. Whether a site is within the industry standard 400 m consultation zone or a specific Anglian Water identified consultation zone, which is greater or less than this, the developer will be asked to provide an odour impact assessment. Anglian Water will object if the development is within an unacceptable distance to operational assets.</p> <p>(5) As a statutory undertaker with duties to provide waste water treatment which is recognised (for example, in NPSWW) as '<i>essential for public health and a clean environment</i>', Anglian Water will seek to resist any neighbouring land use which could potentially constrain its operational activities by, amongst other examples, obstructing or limiting heavy goods vehicle access, increasing the likelihood of nuisance claims or pressure for</p>

Reference	Topic	Applicant's Response
		remedial action such as reducing working hours and/or deliveries, imposing noise limits, etc. This risk is particularly high in the case of sensitive residential receptors and related amenity considerations.
Section 5 Assessment of Alternatives		
5.2.3, 5.2.5 - 5.2.7	Retention on site	This is discussed at 4.5 above.
5.2.4, 5.3	Site selection methodology	The Applicant refers to its responses to questions 2.26-2.29 of the Examining Authority's Written Questions (REP1-079).
Section 6 Compliance with National and Local Planning Policy		
6.1.1 - 6.2.4	Compliance with NPPF	<p>Notwithstanding that it is not 'given' that the application is to be determined under s.105 PA 2008 as asserted by SHH (paragraph 6.1.1), the Applicant acknowledges that the policies of the NPPF, and other policy documents, are capable of being 'important and relevant' to the Secretary of State's decision. The Applicant considers that the Proposed Development complies with the relevant areas of the NPPF, taking into account the need and benefits fully described in the Section 2 of the Planning Statement (App Doc Ref 7.5) [REP1-049]. In response to paragraph 6.2 of SHH's Relevant Representation (REP1-078), an NPPF Accordance Table has been prepared by the Applicant which assesses the Proposed Development against the NPPF. This was submitted as an Accompanying Report to the Planning Statement (App Doc Ref 7.5.4 - REP1-053) at Deadline 1. Please refer to Planning Statement NPPF Accordance Table (App Doc Ref 7.5.4 - REP1-053) which sets out how the development is compliant with NPPF.</p> <p>The point made by SHH that the approach of testing the principle of relocating the CWWTP via the Development Consent Order process also fails to comply with the NPPF (paragraph 6.2.4) is not understood. The approach taken by the local planning authorities in respect of the DCO application and the Local Plan is explained in their responses to ExQ1-2.13 (REP1-140). The s35 direction confirms that the Application is for development which '<i>by itself, is nationally significant</i>' and therefore must be treated as development for which development consent is required. Paragraph 3.1.8 of the Planning Statement (App Doc Ref 7.5) [REP1-049], supported by the Applicant's Legal Submission on the Applicability of S104 and S105 Planning Act 2008 (App Doc Ref 7.15) [AS-126], provides explanation why the NPSWW is considered to have effect in this instance. In this case, the NPSWW is the primary basis for making the decision on the Proposed Development and the Secretary of State must, therefore, decide the Application in accordance with that NPSWW unless one of the conditions set out at subsections (4) to (8) s104 PA 2008 apply. Section 3.5 of the Planning Statement (App Doc Ref 7.5) [REP1-049] confirms that there are no grounds for concluding that the conditions set out at subsections (4) to (8) s104 PA 2008 apply.</p>

Reference	Topic	Applicant's Response
6.3.1 - 6.3.7	Compliance with Local Plan policy	In its response to ExQ1-4.2 (REP1-079), the Applicant submitted Local Policies Accordance Tables (App Doc Ref 7.5.5) [REP1-054] which list all the relevant adopted development plan policies and relevant emerging policies to the DCO and the degree of compliance of the Proposed Development with them. This is a new document submitted at Deadline 1.
6.4.1	Emerging local planning policy	The Applicant disagree to SHH's statement that 'very limited weight should be attached to the emerging Greater Cambridge Local Plan and NECAAP'. See the Applicant's response to paragraph 4.3.1 above.
6.5.1 - 6.5.5	NPSWW	<p>The Applicant disagrees with the statement that 'the NPSWW is of lesser relevance for the decision on whether to grant development consent as the proposed development is neither an NSIP nor does the NPSWW apply to it' for the reasons referred to in response to paragraph 6.1.1 - 6.2.4 above.</p> <p>Please refer to 7.5.1 NPSWW Planning Statement Accordance Table – Version 3 [REP1-051] which outlines how the development is compliant with NPSWW.</p> <p>The Applicant has been clear that there is no operational need for a new or relocated WWTP in Cambridge. There is an operational need for new waste water treatment capacity to serve Waterbeach new town, but this and all other existing development commitments in the combined Cambridge and Waterbeach waste water drainage catchment can be accommodated in biological capacity terms (but not yet in hydraulic/flow capacity terms) up to 270,000pe. There will be a need in due course for additional biological and hydraulic/flow capacity to meet non-committed development (i.e., other Development Plan allocations and any new allocations which are made in the emerging GCLP) up to 2041 which fall in the combined Cambridge and Waterbeach waste water drainage catchment (see Planning Statement paras 2.2.3-2.2.15, 2.4.3 - 2.4.6 and 2.4.24 (App Doc Ref 7.5) [AS-166]. This will have to be accommodated at the existing WWTP if not by the Proposed Development (275,000pe up to 2035 and 300,000pe up to 2041). In respect to the assertion at paragraph 6.5.5 that the NPSWW is out of date, the Applicant would refer to paragraph 1.1.5 NPSWW and the response provided to ExQ1-2.2 (REP1-079).</p>
6.6.1 - 6.6.4	Alternative sites to NEC allocations	The Applicant's refers to South Cambridgeshire District Council's relevant representations (paragraph 25 – RR-004) which recognise that "should the relocation of the CWWTTP not occur, both the District Council and Cambridge City Council would have to try and identify and allocate other land within Greater Cambridge to meet the area's strategic requirements for housing and employment". Under present planning requirements, the Councils have to meet their Objectively Assessed Need (OAN) for housing within their combined boundary and both would have to try and identify and allocate other land within Greater Cambridge to meet the area's strategic requirements for housing and employment. Presuming that this exercise would need to align with the approach adopted to date for the

Reference	Topic	Applicant's Response
		<p>development strategy in the emerging GCLP (i.e., to promote sustainability through provision of sustainable travel), the Councils acknowledge that <i>"this would likely include consideration of other less sustainable strategic locations, including the Edge of Cambridge in the Green Belt and New Settlements with high quality public transport connections to Cambridge"</i>. As suggested above, 3,900 homes will need to be delivered at less sustainable locations within the local plan period.</p> <p>No evidence is presented by SHH to support its assertion at paragraph 6.6.1 (2nd paragraph) as to how sites identified in the housing trajectories for post 2041 development could be brought forward <i>"within the constraints of realistic rates of housing delivery on particular sites"</i> as an alternative to NEC and the contribution intended to be provided on the vacated existing WWTP site. Indeed, SHH's assertion is not credible, does not demonstrate any understanding of development economics and appears to entirely disregard the statements made in South Cambridgeshire District Council's relevant representations (paragraphs 25-26 – RR-004) and Cambridge City Council (paragraphs 29-32 – RR-002) and the importance of early housing delivery highlighted in the announcement by the Prime Minister and the Secretary of State for Levelling Up, Housing and Communities on 24 July 2023 to 'supercharge' Cambridge.</p>
Section 7 Green Belt		
7.1 - 7.7	<p>Very high level of harm on Green Belt instead of 'moderate level'.</p> <p>Excluded the Designated Sites and other features;</p>	<p>SHH's assertion that the entirety of the proposed development is 'inappropriate development' in the Green Belt for the purposes of NPPF paragraphs 149 and 150 is factually wrong. The Applicant refers to its response to ExQ1-11.1 (REP1-079). As is set out in its response to SHH's RRs (AS-) specifically at paragraphs 7.1-7.7, NPSWW paragraph 4.8.18 states that the decision maker will attach substantial weight to the harm to Green Belt (which mirrors the advice at NPPF paragraph 148). In addition to this harm to Green Belt by reason of inappropriateness, the Green Belt Assessment at paragraph 6.1.6 [APP-207] identifies there would be:</p> <ul style="list-style-type: none"> • Harm to the openness of the Green Belt - Moderate • Harm to the purposes of including land in the Green Belt – Moderate <p>These are considered to be significant effects. The Planning Statement (REP1-049) addresses these impacts in paragraphs 4.8.26 - 4.8.45.</p> <p>The scope and methodology used by the Applicant to assess the impact of the Proposed Development on the Cambridge Green Belt is clearly set out in section 2 of the Green Belt Assessment [App Doc Ref 7.5.3 - APP-207]. It takes into account guidance on the assessment of the impact of a development on the openness of the Green Belt</p>

Reference	Topic	Applicant's Response
	<p>Harm on historic environment and landscape and visual amenity should be factored in.</p>	<p>provided in paragraph 1 of the planning practice guidance (PPG) on Green Belt (2019) and highlights the difference in scope and approach of this assessment from that taken in the Landscape and Visual Impact Assessment (LVIA) of the Proposed Development (App Doc Ref 5.2.15 - AS-034).</p> <p>At paragraph 2.2.1 of the Applicant's Green Belt Assessment, the statement is made that "this assessment is informed by the findings of the Greater Cambridge Green Belt Assessment (LUC, 2021) and applies the methodology set out in Chapter 3 and the worked example in Appendix D of that assessment", despite that assessment relating to potential release of broad areas of land at a wider scale. At paragraph 2.2.2, the difference between the assessment basis of the LUC 2021 study and the basis for the Applicant's site-specific assessment is highlighted. Section 3 of the Applicant's Green Belt Assessment then summarises the assessment of the overall contribution to Cambridge Green Belt purposes of Green Belt land in the area of the Proposed Development as reported in the Greater Cambridge Green Belt Assessment (LUC, 2021). In section 4, the Applicant's Green Belt Assessment then defines the land parcel comprising the 'specific new development scenario' to be investigated (as advocated by the LUC 2021 study) and then assesses the contribution that land parcel currently makes to the purposes of the Cambridge Green Belt, the impact of the development of the proposed WWTP on the Green Belt purposes of the site and adjacent Green Belt land parcels (as defined in the LUC 2021 study) and the resulting overall harm to the Green Belt that would potentially result from the development of the proposed WWTP in this location.</p> <p>Because the Proposed Development is a discrete development with a fully mitigated outline design (the landscape masterplan and LERMP are designed to reduce landscape and visual impacts, improve biodiversity and create opportunities for greater recreational use of the countryside), the Applicant's Green Belt Assessment is able to consider a finer level of granularity before reaching its conclusions. This approach is considered to be entirely reasonable and to provide a robust outcome which has informed the overall planning assessment of the Proposed Development provided in the Planning Statement (App Doc Ref 7.5 - AS-166).</p> <p>SHH's assertion, therefore, that the Green Belt methodology excludes 'designated sites and other features contributing positively to character of the landscape setting' and is inconsistent with the methodology in the Greater Cambridge Green Belt Assessment, 2021 (LUC) is not accepted.</p>
<p>Section 8 Design, Engineering and Landscape</p>		

Reference	Topic	Applicant's Response
8.1	SHH 04 - Introduction	<p>The Applicant notes the comments in Written Representation SHH 04 and responds below. Further response to Appendix SHH 08 - Design Critique is in Section 13 below.</p> <ul style="list-style-type: none"> • SHH 08 Section 3.0 Community: The Applicant reviewed all consultation responses as required by Section 49 of the Planning Act 2008, including feedback from local communities as required by Section 49 (3)(a). • A full record of all responses received under Section 47 of the 2008 Planning Act (Duty to consult local community), how the Applicant has had regard to these responses, and whether the feedback resulted in a change to the proposals is available in Appendix 6.1.2: Applicant Regard to Section 47 Consultation Responses (APP-166). With respect to the comment made about SHH concerns regarding the size and capacity of the plant raised in its Relevant Representation, please see Document 8.2 and the Applicant's response to this point at 8.2.
8.2.1 – 8.2.4	Landscape and Visual Amenity SHH 04	<p>In response to paragraph 8.2.1 – 8.2.4:</p> <p>The Applicant notes the comments made in this section which reflect comments previously provided in SHH Relevant Representations (Document Reference RR-035). The Applicant refers to the responses provided in its Document 8.2, Responses to Relevant Representations references 10.4 and 10.5.</p> <p>The Applicant noted in its response to SHH Relevant Representation that it was SHH's intention to submit further evidence regarding viewpoints and visual effects. The Applicant has reviewed the material submitted in SHH 04 Written Representation which questions the levels of sensitivity and effects reported in the LVIA (App Doc Ref 5.2.15) [AS-034] and considers that the LVIA has followed the LVIA methodology (App Doc Ref 5.4.15.5) [APP-131] and that the assessment of effects is justified.</p>
8.2	Limitations of Mitigation Planting	<p>In response to paragraph 8.2.5:</p> <p>The Applicant notes the comments but considers that the planting proposals set out in the LERMP (App Doc Ref 5.4.8.14) [AS-066] are appropriate and together with the earth bank will filter and screen views of the proposed WWTP from the majority of views by year 15. The landscape mitigation is shown on the landscape masterplan in the LERMP. It includes belts of woodland around the perimeter of the Proposed WWTP site, a series of 5m high earth banks encircling the Proposed WWTP, tree planting around the base of the banks and hedgerow and clusters of semi-mature and advanced nursery stock trees on the flat, 6m wide area along the top of the banks. By year 15 of operation, the woodland, earth banks and hedgerow will provide a continuous screen of around 8m high, with further filtering and screening provided by tree planting on the earth banks. Figure 3.5 in the LERMP, which illustrates the potential growth of the planting by years 1, 5 and 15 of operation, shows that the trees on and around the earth banks will be taller than</p>

Reference	Topic	Applicant's Response
		<p>the hedgerow on the earth banks and by year 5, will contribute to the filtering and screening of views. By year 15 the crowns of the trees will have widened and overlapped and, as reported in the LVIA (App Doc Ref 5.2.15) [AS-034], screen or filter the majority of the structures in the Proposed WWTP from the surrounding area. The screening and filtering will be most effective in summer, but as the planting becomes established, even in winter it will provide some visual mitigation. The photomontages (App Doc Ref 5.4.15.1) [APP-127] show views in year 15 in winter, illustrating this point.</p> <p>The LERMP (App Doc Ref 5.4.8.14) [AS-066] describes the maintenance of the planting on the earth banks to aid establishment and growth. This includes weed control, irrigation, pruning and replacement of failed planting. Trees will be planted in early winter to aid maximum root establishment and the trees on the earth banks will be watered in periods of drought during the first five growing seasons. The tree species selected to grow on the earth banks will be species that tolerate the drier growing conditions found in East Anglia and which are found growing locally.</p> <p>In response to paragraph 8.5.6 (NB numbering not consecutive in SHH 04): The LVIA (App Doc Ref 5.2.15) [AS-034] reports that in year 15, the majority of the structures on the Proposed WWTP will be screened by woodland and hedgerow planting but that a number of the taller structures will remain visible above or between the trees along the top of the earth banks. The LVIA concurs with the list of structures in Table 3 that will be taller than the earth bank and mitigation in Table 3 of SHH 04 but reports that not all these structures will be visible in all views. This will depend on the angle of view, the viewer's distance from the site, screening provided by other structures within the site and the growth of the mitigation planting (assuming the measures in the LERMP described above have been fully implemented).</p> <p>In response to paragraph 8.5.7: The reduction in the level of effects on most views by year 15 of operation will result from the growth of mitigation planting around the Proposed WWTP and on the earth banks which will surround the site. While it is not possible to predict the growth rate of planting, the measures in the LERMP (App Doc Ref 5.4.8.14) [AS-066] including soil management, watering and maintenance will encourage good establishment and growth. The LVIA has assumed that these measures will be implemented in the assessment of effects in year 15.</p> <p>The LVIA (App Doc Ref 5.2.15) [AS-034] states that in close views, for example from Viewpoint 17 on Low Fen Drove Way, woodland planting will screen the Proposed WWTP from view but that it will change the view from an open view</p>

Reference	Topic	Applicant's Response
		<p>over farmland to a view of woodland. The assessment of effects acknowledges this change in the nature of the view by reporting a moderate adverse significant effect rather than a lower level of effect.</p> <p>The LVIA reports that some structures on the Proposed WWTP will remain visible above mitigating planting in year 15 but that as more of the structures are screened, effects will reduce. For example, from Viewpoint 10 on High Ditch Road, the extent of visible structures will narrow to the group of tall structures clustered around the digesters by year 15, approximately 1km away and seen beyond intervening fields and the A14. While they will remain visible, they will be less prominent in the view and effects will reduce to slight adverse.</p> <p>The photomontages (App Doc Ref 5.4.15.1) [APP-127] should be viewed at the paper size they were prepared for, as stated on the photomontages. If they are viewed at the correct size, the scale of the image in the photomontage will be similar to the scale of the proposed structures in reality. However, as the Landscape Institute guidance points out: <i>Two dimensional visualisations, however detailed and sophisticated, can never fully substitute what people see in reality. They should, therefore, be considered an approximation of the three-dimensional visual experience that an observer might receive in the field.</i></p> <p>In response to paragraph 8.2.8: The photographs illustrating the view from the representative viewpoints (App Doc Ref 5.14.15.2 [AS – 099] were taken from publicly accessible locations in line with the LVIA methodology (App Doc Ref 5.4.15.5) [APP-131] and consequently no view was taken from Saint Peter's Church, Horningsea.</p> <p>The LVIA (App Doc Ref 5.2.15) [AS-034] assessed the impact of the treated effluent discharge outfall on views from Viewpoint 23 on Footpath Milton 162/1 which is on the opposite side of the river (on the tow path) from the outfall. The outfall will be less apparent from the eastern side of the river, on Footpath Fen Ditton 85/6, as the roof will be at or around ground level, covered in earth and seeded with grass seed.</p> <p>In line with Table 1-7 in the LVIA methodology (App Doc Ref 5.4.15.5) [APP-131], the sensitivity of cyclists and pedestrians on the Horningsea Road, represented by Viewpoint 25, was assessed as being medium. Road users on the Horningsea Road were represented in the LVIA by Viewpoint 18 on Horningsea Road. Receptor sensitivity depends on the type of receptor and the value of the view.</p>

Reference	Topic	Applicant's Response
		<p>It is unlikely that the Proposed WWTP will be clearly visible from Viewpoint 5 on Newmarket Road because it will be screened by intervening vegetation on garden boundaries, the A14 and along the dismantled railway line. Residential receptors represented by Viewpoint 7 on High Ditch Road are assessed as of high sensitivity in the LVIA because their attention will be focussed on the static view from their properties but road users represented by Viewpoint 9 on High Ditch Road are assessed as of medium sensitivity, in line with the LVIA methodology, because their attention is likely to be less focussed on the view as they travel down the road.</p> <p>Viewpoint 28 represents the views of residents in Horningsea. The village is almost entirely outside the zone of theoretical visibility for year 1 of operation (App Doc Ref 5.3.15) [AS-048] and the LVIA reports slight adverse effects because the Proposed WWTP will be screened from view by intervening vegetation. The tallest structures on the site might be visible in glimpsed views from back gardens.</p>
Section 9 Carbon		
9.5.3	Reliability of the Strategic Carbon Assessment	<p>This strategic study's principal purpose is to provide supplementary information related to carbon for the EIA as part of the DCO process. It is a high-level comparative assessment that broadly follows the RICS carbon assessment principles and incorporates a range of scenarios designed to make best use of the available data. While a level of uncertainty is inherent in this type of analysis, the findings themselves (i.e. that higher density housing that is located more centrally to the City of Cambridge will generally lead to lower emissions than lower density housing that is further away from the City) are not that surprising. Furthermore, the magnitude of the difference between the modelling scenarios is such that we can have confidence in the overall direction of the findings, even if there is some variation in the actual amount of emissions that are realised in practice.</p> <p>Taking account of future socio-economic and demographic changes is beyond the scope of this assessment. The key variable that Anglian Water is able to influence here is where the housing is delivered in Greater Cambridge, whether that is at the North East Cambridge site or in a generic suburban location where 8,350 homes could feasibly be delivered.</p> <p>If there were differences between the proposed and counterfactual developments in terms of their socio-economic and demographic attributes, then this would mean that emissions have been displaced from another development. For example, if the counterfactual development housed a higher proportion of retirees than the proposed development, then it might be reasonable to expect that the operational carbon emissions associated with housing would be higher (due to higher heating-related emissions, for example). However, in practice, these additional retirees would not be</p>

Reference	Topic	Applicant's Response
		<p>being 'created' but rather be moving in from elsewhere (which would then potentially see a proportionate reduction in heating-related emissions).</p> <p>As such, to isolate the impact that changing this location has on housing and commuting emissions and compare the developments on a like-for-like basis, socio-economic and demographic variables are assumed to be the same across the two modelling scenarios.</p>
9.5.4	SCA Aspects 1, 2 and 3	<p>Aspect 1:</p> <p>Emissions from the demolition of the existing WWTP are not included in the Environmental Impact Assessment (EIA). It is not part of the scope of this proposal and that work will be done by the future developer and considered as part of a separate planning application. It is likely to include the effects of emissions from plant used in demolition, taking into account the re-use of materials including secondary aggregate, recovered steel and other equipment. Chapter 2 Project Description paragraph 1.4.7 states that consent is not sought under the Development Consent Order for the subsequent demolition or redevelopment of the Cowley Road site. However, the Applicant has undertaken an assessment of the indicative scale of demolition emissions based on structure volumes and site area to be cleared on the existing site to demonstrate the likely scale of these emissions. These are outlined below and will be provided by Deadline 3 as part of an updated 7.5.2 Planning Statement Strategic Carbon Assessment [APP-206][MOU1] [PD2]</p> <p>Anglian Water's estimate of the emissions associated with demolition, material processing, transport away from site, and ground remediation is 3,865 tCO₂e. If this is added to the mid-point estimate of embodied and operational emissions for the WWTP (71,000 tCO₂e), these emissions represent ~5% of total WWTP emissions. They represent ~0.3% of total emissions for the proposed development under the mid-point scenario (1,400,000 tCO₂e). Several conservative assumptions have been made with this estimate, including locating the disposal site 50km away from the demolition site (there are many things that could be done to reuse aggregate on site or locally) and that the plant and transport is exclusively diesel powered.</p> <p>The report commissioned by Save Honey Hill Group also estimates the emissions associated with decommissioning of the site, demolition of structures, material processing and ground remediation. It arrives at a slightly lower but similar estimate of 2,800 tCO₂e. If this is added to the mid-point estimate of embodied and operational emissions for the WWTP (71,000 tCO₂e), these emissions represent ~4% of total WWTP emissions. They represent ~0.2% of total emissions for the proposed development under the mid-point scenario (1,400,000 tCO₂e).</p>

Reference	Topic	Applicant's Response
		<p>Although these emissions are not negligible, they are not significant enough to change the key finding of this comparative assessment. A note has been added to the Strategic Carbon Assessment report detailing these demolition emissions.</p> <p>Aspect 2: Whole Life Carbon (WLC) targets are used to assess the embodied carbon of the housing and associated infrastructure and Energy Use Intensity (EUI) targets to assess the operational carbon. EUI refers to the total amount of energy used per square foot annually in a building and hence does account for emissions associated with occupation of the development. Project aspiration, good practice and business-as-usual options were provided by Useful Projects that provide a range of embodied and operational carbon targets based on the types of building that are developed, the materials that are used, and the energy efficiency that is achieved.</p> <p>Aspect 3: The Greater Cambridge Local Plan – Strategic spatial options appraisal: implications for carbon emissions formed the basis of our operational carbon transport modelling, the methodology is summarised below.</p> <p>Operational transport carbon emissions were estimated using local BEIS and Census per capita carbon emissions data. This was then calibrated on a scale from 0-10 representing the potential for each mode of travel in each location type, undertaken by an experienced transport consultant using insight on travel distances and modal share from the Cambridge Sub-Regional Transport Model. A zero carbon policies option was modelled, which included an increase in sustainable travel initiatives and a faster roll-out of electric vehicles compared to the business-as-usual scenario. Our mid-point estimate was an average of these two scenarios.</p> <p>This transport modelling sets out six location categories within which the emissions of each home would be expected to be similar: urban; edge of city greenbelt; edge of city non-greenbelt; new settlement; village; and public transport corridor. The North East Cambridge site was categorised as 'urban', given that it is located close to the City of Cambridge and adjacent to a mainline railway station. The counterfactual housing development, given its scale, would likely be well connected to public transport and was hence categorised as a 'public transport corridor', the second lowest location category in terms of transport emissions per home. The modelling therefore accounted for the commuting patterns that would likely occur in these different residential neighbourhoods.</p>

Reference	Topic	Applicant's Response
		<p>In terms of embodied carbon transport modelling, Acorn profile overviews were used that detail vehicles per household data for Cambridge City and Cambourne. These figures were scaled using average lifespan of vehicle data (Society of Motor Manufacturers and Traders data), average vehicle mileage data (MOT data), share of the new car market over time by type of vehicle data (based on SMMT data), and vehicle manufacturing emissions (based on International Council on Clean Transportation data).</p>
9.5.5	SCA Scenarios	<p>The conservative scenario informed the overall results that are set out in the non-technical summary of the report. However, it is important to note that changing the pace of the housing delivery does not significantly affect the magnitude of the difference between the proposed development and counterfactual in terms of emissions produced. For example, under the conservative housing scenario, the counterfactual produces ~36% more emissions than the proposed development. Under the optimistic scenario, the counterfactual produces ~38% more emissions than the proposed development. The findings presented here are under the mid-point policy scenario but are consistent across all three policy scenarios. These findings demonstrate that, regardless of the pace of housing delivery, the key finding of this study remains unchanged.</p>
9.5.6	SCA Methodology	<p>This strategic study's principal purpose is to provide supplementary information related to carbon for the EIA as part of the DCO process. It is a high-level comparative assessment that broadly adheres to overarching RICS carbon assessment principles and incorporates a range of scenarios to account as best as possible for the available data. While a level of uncertainty should be attributed to the results, the magnitude of the difference between the modelling scenarios is such that we can have confidence in the overall findings, i.e. that the counterfactual (alternative) scenario will generate significantly more emissions than Anglian Water's proposed relocation project. This key conclusion holds even if there is some variation in the absolute amount of emissions that are realised.</p> <p>Taking account of socio-economic and demographic changes is beyond the scope of this assessment. The key variable that Anglian Water is able to influence here is where the housing is delivered in Greater Cambridge, whether that is at the North East Cambridge site or in a generic suburban location where 8,350 homes could feasibly be delivered.</p> <p>If there were differences between the proposed and counterfactual developments in terms of their socio-economic and demographic attributes, then this would mean that emissions have been displaced from another development. For example, if the counterfactual development housed a higher proportion of retirees than the proposed development, then it might be reasonable to expect that the operational carbon emissions associated with housing would be higher (due to higher heating-related emissions). However, this does not mean that the counterfactual development is</p>

Reference	Topic	Applicant's Response
		<p>generating more emissions in and of itself as it is not creating extra retirees, it is just shifting the emissions from another development.</p> <p>As such, to isolate the impact that changing this location has on housing and commuting emissions and compare the developments on a like-for-like basis, socio-economic and demographic variables are assumed to be the same across the two modelling scenarios.</p> <p>Given that Aspect 3 relates specifically to transport, the methodology does account for the impact that spatial and temporal variables have on emissions. Operational transport emissions were modelled using transport emissions per home data that was based upon location-dependent factors, whilst embodied transport emissions were modelled using number of vehicles per home data, which was also location-specific. These emissions figures account for the decarbonisation of the electricity grid, the roll-out of electric vehicles, and the implementation of sustainable travel initiatives over time.</p>
9.5.7	SCA Assumptions	<p>i) Extent of compared developments: The relocation project will enable the delivery of 8,350 new homes, both at the core site and in the surrounding area, and the delivery of this number of homes was therefore modelled for the proposed development. Therefore, in order to undertake a comparative assessment, we also modelled the delivery of 8,350 homes for the counterfactual scenario. If 5,600 homes were modelled, the same proportional difference between the proposed development and counterfactual would be found.</p> <p>ii) For Aspect 2, occupation differences: Taking account of socio-economic and demographic variables, such as those listed above, is beyond the scope of this assessment. The key variable that Anglian Water are able to influence here is where the housing is delivered in Greater Cambridge, whether that is at the North East Cambridge site or in a generic suburban location where 8,350 homes could feasibly be delivered.</p> <p>If there were differences between the proposed and counterfactual developments in terms of their socio-economic and demographic attributes, then this would mean that emissions have been displaced from another development. For example, if the counterfactual development housed a higher proportion of retirees than the proposed development, then it might be reasonable to expect that the operational carbon emissions associated with housing would be higher (due to higher heating-related emissions). However, this does not mean that the counterfactual development is</p>

Reference	Topic	Applicant's Response
		<p>generating more emissions in and of itself as it is not creating extra retirees, it is just shifting the emissions from another development.</p> <p>As such, to isolate the impact that changing this location has on housing and commuting emissions and compare the developments on a like-for-like basis, the number of residents and other socio-economic and demographic variables are assumed to be the same across the two modelling scenarios.</p> <p>The purpose of comparing this assessment is to compare the proposed development to a reasonable counterfactual, i.e. where the equivalent number of homes and residents could be delivered and housed elsewhere in Greater Cambridge. Therefore, the number of residents is also the same for both developments so that we can make the assessment on a like-for-like basis.</p> <p>iii) Types of Housing: The North East Cambridge site is unique given that it is Cambridge's last major brownfield site, is located close to the City of Cambridge and adjacent to a mainline railway line. The proposed development's buildings are expected to be mid-rise apartment blocks that enable the delivery of high density residential units (average unit size of 77m² GIA). In terms of a settlement that could represent a reasonable median comparator for the purposes of this assessment, it is unreasonable to compare the proposed development site both with a dispersed village settlement, or with an identical site in terms of housing density and location, given that it is these characteristics that make the proposed site unique. Hence, a generic suburban settlement, that has characteristics broadly in line with the sites on which 8,350 new homes could feasibly be delivered in Greater Cambridge, was chosen as a reasonable median comparator. In this case, Useful Projects used Northstowe as a suitable proxy. Residential units would largely be delivered via houses and low-rise apartment blocks in this location, which are generally lower density than mid-rise apartment blocks and have a larger average residential unit size (average unit size of 100 m² GIA). Increased market demand for larger homes in suburban locations and National Space Standards (NSS) requirements in suburban locations compared to urban locations are two key factors that underpin why there is a difference in floorspace between the proposed and counterfactual scenarios.</p> <p>It is unsurprising that a less dense development with a larger GIA (the counterfactual) produces significantly more emissions than a more dense development with a smaller GIA (the proposed development).</p>

Reference	Topic	Applicant's Response
		<p>It is reasonable to conclude that a less dense development with a larger GIA (the counterfactual) will produce significantly more emissions than a more dense development with a smaller GIA (the proposed development).</p> <p>Furthermore, we have conservatively modelled the same WLC embodied carbon factors for both the proposed development and counterfactual sites. This is likely to reduce the magnitude of the difference between the proposed site and counterfactual in terms of emissions, given that the North East Cambridge site will be a brownfield site and is likely to have a significantly lower infrastructure load and therefore lower embodied carbon emissions.</p> <p>iv) Vehicle ownership and trip making: For the embodied carbon transport modelling, Acorn profile overviews were used that detail vehicles per household data for Cambridge City and Cambourne. These locations were used to reflect the fact that the North East Cambridge site, given its urban location close to a mainline railway station, will likely have lower car ownership than the counterfactual housing development, which would be a development similar to Cambourne and Northstowe.</p> <p>The Greater Cambridge Local Plan – Strategic spatial options appraisal: implications for carbon emissions formed the basis of our operational carbon transport modelling. Operational transport carbon emissions were estimated using local BEIS and Census per capita carbon emissions data. This was then calibrated on a scale from 0-10 representing the potential for each mode of travel in each location type, undertaken by an experienced transport consultant using insight on travel distances and modal share from the Cambridge Sub-Regional Transport Model. A zero carbon policies option was modelled, which included an increase in sustainable travel initiatives and a faster roll-out of electric vehicles compared to the business-as-usual scenario. Our mid-point estimate was an average of these two scenarios.</p> <p>This transport modelling used set out six location categories within which the emissions of each home would be expected to be similar: urban; edge of city greenbelt; edge of city non-greenbelt; new settlement; village; and public transport corridor. The North East Cambridge site was categorised as 'urban', given that it is located close to the City of Cambridge and on a mainline railway station. It is a unique location and the counterfactual development would be located further away from the City of Cambridge and not benefit from the same urban location or link to a mainline railway station. However, given the scale of the proposed housing development, whether it is an outward extension of a current development, such as Northstowe or Cambourne, or a standalone new settlement, it is likely that implementing comprehensive public transport links would be a priority. The counterfactual was hence categorised as 'public transport corridor', the second lowest location category in terms of transport emissions per home.</p>

Reference	Topic	Applicant's Response
		<p>Our modelling therefore accounts for differing travel patterns in different residential neighbourhoods – specifically that being located further away from the City of Cambridge will increase transport emissions given that car usage will increase and public transport usage, walking and cycling will fall.</p> <p>Taking account of variables such as age, and social and economic profile, and commuting patterns to London, is beyond the scope of this assessment. The key variable that Anglian Water is able to influence here is where the housing is delivered in Greater Cambridge, whether that is at the North East Cambridge site or in a generic suburban location where 8,350 homes could feasibly be delivered.</p> <p>If there were differences between the proposed and counterfactual developments in terms of their socio-economic and demographic attributes, then this would mean that emissions have been displaced from another development. For example, if the counterfactual development housed a higher proportion of retirees than the proposed development, then it might be reasonable to expect that the operational carbon emissions associated with housing would be higher (due to higher heating-related emissions). However, this does not mean that the counterfactual development is generating more emissions in and of itself as it is not creating extra retirees, it is just shifting the emissions from another development.</p> <p>As such, to isolate the impact that changing this location has on housing and commuting emissions and compare the developments on a like-for-like basis, these variables are assumed to be the same across the two modelling scenarios.</p> <p>v) The counter factual suburban location: In terms of a settlement that could represent a reasonable median comparator for the purposes of this assessment, it is unreasonable to compare the proposed development site both with a dispersed village settlement, or with an identical site in terms of housing density and location, given that it is these characteristics that make the proposed site unique. Hence, a generic suburban settlement that has characteristics broadly in line with the sites on which 8,350 new homes could feasibly be delivered in Greater Cambridge, was chosen as a reasonable median comparator. This could either be an extension of a current development, such as Northstowe or Cambourne, or a standalone new settlement.</p> <p>The transport modelling that we used set out six location categories within which the emissions of each home would be expected to be similar: urban; edge of city greenbelt; edge of city non-greenbelt; new settlement; village; and public transport corridor. The North East Cambridge site was categorised as 'urban', given that it is on Cambridge's last major brownfield site, located close to the City of Cambridge and is near to a mainline railway station. It is a unique location</p>

Reference	Topic	Applicant's Response
		<p>and the counterfactual development would not benefit from the same urban location or link to a mainline railway station. However, given the scale of the proposed housing development, whether it is an outward extension of a current development or a standalone new settlement, it is likely that implementing comprehensive public transport links would be a priority. The counterfactual is hence categorised as a 'public transport corridor' in the spatial options tool, the second lowest category in terms of transport emissions per home.</p> <p>The new Cambridge East/Cambridge Airport development is already identified in the spatial strategy and its capacity to meet part of Greater Cambridge's housing needs is defined. It does not, therefore, offer an alternative to the homes to be delivered at the proposed North East Cambridge site. An outward extension, i.e. beyond the development area currently envisaged into the greenbelt, may be feasible, but this would likely be categorised as an 'edge of city greenbelt' location and bring with it higher transport emissions per home than a 'public transport corridor' location.</p> <p>The operational carbon transport modelling accounts for an increase in electric vehicles as a share of the car market, the roll-out of other sustainable travel initiatives, and the decarbonisation of the electricity grid over time.</p> <p>The embodied carbon transport modelling accounts for an increase in electric vehicles as a share of the new car market. Due to a lack of reliable data, the decarbonisation of manufacturing was not considered. However, if this was taken into account, then the embodied emissions of both the proposed development and counterfactual would fall and the same proportional difference between the modelling scenarios would be found. This would therefore have no bearing upon the overall conclusion of this study.</p>
9.5.8 - 9.5.13	SCA Findings and Conclusions	<p>In respect of paragraph 9.5.9, emissions from the demolition of the existing WWTP are not included in the Environmental Impact Assessment (EIA). It is not part of the scope of this proposal and that work will be done by the future developer and considered as part of a separate planning application. It is likely to include the effects of emissions from plant used in demolition, taking into account the re-use of materials including secondary aggregate, recovered steel and other equipment. Chapter 2 Project Description paragraph 1.4.7 states that consent is not sought under the Development Consent Order for the subsequent demolition or redevelopment of the Cowley Road site. However, the Applicant has undertaken an assessment of the indicative scale of demolition emissions based on structure volumes and site area to be cleared on the existing site to demonstrate the likely scale of these emissions. These are outlined below and will be provided by Deadline 3 as part of an updated 7.5.2 Planning Statement Strategic Carbon Assessment [APP-206][MOU1] [PD2]</p>

Reference	Topic	Applicant's Response
		<p>Anglian Water's estimate of the emissions associated with demolition, material processing, transport away from site, and ground remediation is 3,865 tCO₂e. If this is added to the mid-point estimate of embodied and operational emissions for the WWTP (71,000 tCO₂e), these emissions represent ~5% of total WWTP emissions. They represent ~0.3% of total emissions for the proposed development under the mid-point scenario (1,400,000 tCO₂e). Several conservative assumptions have been made with this estimate, including locating the disposal site 50km away from the demolition site (there are many things that could be done to reuse aggregate on site or locally) and that the plant and transport is exclusively diesel powered.</p> <p>The report commissioned by Save Honey Hill Group also estimates the emissions associated with decommissioning of the site, demolition of structures, material processing and ground remediation. It arrives at a slightly lower but similar estimate of 2,800 tCO₂e. If this is added to the mid-point estimate of embodied and operational emissions for the WWTP (71,000 tCO₂e), these emissions represent ~4% of total WWTP emissions. They represent ~0.2% of total emissions for the proposed development under the mid-point scenario (1,400,000 tCO₂e).</p> <p>Although these emissions are not negligible, they are not significant enough to change the key finding of this comparative assessment. A note has been added to the Strategic Carbon Assessment report detailing these demolition emissions.</p> <p>In respect of paragraph 9.5.10, in order to isolate the impact of the location of the housing development, we have modelled that the number of residents will be the same in both locations. The GIA per resident will be lower in an urban location like North East Cambridge compared to a suburban location where the residential units will likely be delivered via houses and low-rise apartment blocks, as opposed to higher density mid-rise apartment blocks at the North East Cambridge site. Our modelling demonstrates that, due to this increased GIA, embodied emissions from delivering housing at the counterfactual site will be significantly higher.</p> <p>In respect of paragraph 9.5.11, the relocation project will enable the delivery of 8,350 new homes and this was modelled for the proposed development. Therefore, in order to undertake this comparative assessment, we also modelled the delivery of 8,350 homes for the counterfactual scenario. If 5,600 homes were modelled, the same proportional difference between the proposed development and counterfactual would be found.</p>

Reference	Topic	Applicant's Response
		<p>In respect of paragraph 9.5.12, if the number of homes assessed was 5,600 (instead of 8,350), then transport emissions for both the proposed development and counterfactual would fall and the same proportional difference would be found between the proposed development and counterfactual in terms of emissions produced.</p> <p>The transport modelling that we used set out six location categories within which the emissions of each home would be expected to be similar: urban; edge of city greenbelt; edge of city non-greenbelt; new settlement; village; and public transport corridor. The North East Cambridge site was categorised as 'urban', given that it is on Cambridge's last major brownfield site, located close to the City of Cambridge and is near to a mainline railway station. It is a unique location and the counterfactual development would not benefit from the same urban location or mainline railway station connection. However, given the scale of the proposed housing development, whether it is an outward extension of a current development, such as Northstowe or Cambourne, or a standalone new settlement, it is likely that implementing comprehensive public transport links would be a priority. The counterfactual is hence categorised as a 'public transport corridor' in the spatial options tool, the second lowest category in terms of transport emissions per home.</p> <p>The new Cambridge East/Cambridge Airport development is already identified in the spatial strategy and its capacity to meet part of Greater Cambridge's housing needs is defined. It does not, therefore, offer an alternative to the homes to be delivered at the proposed North East Cambridge site. An outward extension, i.e. beyond the development area currently envisaged into the greenbelt, may be feasible, but this would likely be categorised as an 'edge of city greenbelt' location and bring with it higher transport emissions per home than a 'public transport corridor' location. There is therefore not an exaggeration of the difference in transport emissions between the two locations.</p> <p>In respect of SHH's conclusions, this strategic study's principal purpose is to provide supplementary information related to carbon for the EIA as part of the DCO process. It is a high-level comparative assessment that broadly adheres to overarching RICS carbon assessment principles and incorporates a range of scenarios to account as best as possible for the available data. While a level of uncertainty should be attributed to the results, the magnitude of the difference between the modelling scenarios is such that we can have confidence in the overall findings, i.e. that the counterfactual (alternative) scenario will generate significantly more emissions than Anglian Water's proposed relocation project. This key conclusion holds even if there is some variation in the absolute amount of emissions that are realised.</p>

Reference	Topic	Applicant's Response
		<p>The key finding of this comparative assessment is fundamentally driven by the fact that a suburban development will produce more emissions than an urban development for two reasons: Firstly, the residential units will have a larger floor area, which significantly increases embodied carbon emissions. Secondly, as it is located further away from the City of Cambridge, it will increase transport-related emissions due to the increased travel demand associated with transport into the centre.</p>
<p>Section 10 Environmental Impacts and Mitigation</p>		
<p>10.2</p>	<p>Biodiversity</p>	<p>ES Chapter 8: Biodiversity (App Ref Doc 5.2.8) does not report any residual significant effects to any SSSIs. The Applicant therefore does not consider that the relative proximity of any SSSIs precludes the ability of the Proposed Development to achieve 20% BNG.</p> <p>The habitats forming part of Stow-cum-Quy Fen SSSI are at their closest point approximately 845m from the Scheme Order Limits. The Applicant reiterates that ES Chapter 8: Biodiversity (App Ref Doc 5.2.8) does not report any residual significant effects to any SSSIs.</p> <p>Regarding recreational pressures, similar points have been raised by Natural England in their Relevant Representations [RR-016] and the Applicant refers to its Responses to the Relevant Representations [REP1-078].</p> <p>In relation to water monitoring, the Applicant refers to the Outline Water Quality Monitoring Plan (App Doc Ref 5.4.20.3) provided at Deadline 2, which sets out the approach to groundwater monitoring and has been agreed with the Environment Agency.</p> <p>Appendix C of the BNG Report (App Doc Ref 5.4.8.13) provided at Deadline 2 explains that river units required to achieve 20% BNG will be sought through off-site arrangements.</p> <p>Regarding the use of Low Fen Drove Way CWS by bats, the Applicant undertook bat surveys (transect) within this area (see Figure 8.46 showing the transect route in ES Book of Figures Biodiversity (App Doc Ref 5.3.8) [AS-050]). It is anticipated that connection to the gas grid would be made using an existing gap in the hedgerow to minimise the need for fragmentation of hedgerow habitat. The habitats impacted will be reinstated post works, and will be maintained/monitored for 30 years, in line with the BNG Report (App Doc Ref 5.4.8.13) and ES Appendix 8.14 Landscape, Ecological and Recreational Management (LERMP) Plan (App Doc Ref 5.4.8.14) [AS-067].</p>

Reference	Topic	Applicant's Response
		<p>The Applicant undertook terrestrial invertebrate surveys (ES Appendix 8.6 Terrestrial Invertebrates Baseline Technical Appendix (App Doc Ref 5.4.8.7) [APP-091]) to inform the environmental assessment. This included specific detail relating to Hymenoptera and a comparison of species found as part of the Applicant's surveys, when compared to previous records (see Table 5.3). The 2021 surveys (compartments illustrated within Figure 8.39 in ES Book of Figures (App Doc Ref 5.3.8) [AS-050]) found that Low Fen Drove Way (including Snout Corner – Compartment B) and the dismantled railway line (Compartment C) had the highest number of British Rarity designated species. The measures proposed to support terrestrial invertebrates (of particular benefit to Hymenoptera) within ES Appendix 8.14 Landscape, Ecological and Recreational Management (LERMP) Plan (App Doc Ref 5.4.8.14) [AS-067] include management to prevent overshadowing by new woodland, or scrub encroachment, along the Low Fen Drove Way CWS, planting and management of grassland areas, and provision of bare earth areas with variable micro-climes supported on the banks of the rotunda design. Additional measures to support invertebrates include retention of standing deadwood, creation of habitat piles and woodland fungal growth (if safety concerns do not pose a risk), as well as ditch habitat creation, scrub and woodland and seasonal ponds. These measures are outlined within the BNG Report (App Doc Ref 5.4.8.13) and ES Appendix 8.14 Landscape, Ecological and Recreational Management (LERMP) Plan (App Doc Ref 5.4.8.14) [AS-067].</p>
10.3		<p>The Mental Wellbeing Impact Assessment (MWIA) (App Doc Ref 5.4.12.3) [AS-077] was used as a screening tool. The outputs are also considered within the context of the assessment of health effects within the Environmental Impact Assessment, and the likelihood of significant health effects (which includes physical and mental health) associated with the Proposed Development.</p> <p>The Applicant has set out the likely significant health effects associated with the Proposed Development in ES Chapter 12: Health (App Doc Ref 5.2.12) [APP-044]. This covers affected local communities and those who visit or commute; and is intended to look across all the physical and mental health risks and issues to identify the specific significant effects. ES Chapter 12: Health (App Doc Ref 5.2.12) [APP-044] looks across the stated study area, which particularly focuses on communities within 500m of the proposed developments but expands to include all the affected communities.</p> <p>The application of a Community Liaison Plan will provide a mechanism for continued engagement with the community throughout the delivery of the Proposed Development. This will provide local residents (and very specific sub-populations) and community members a forum to raise and address concerns including health and wellbeing matters.</p>

Reference	Topic	Applicant's Response
		<p>This could also capture ideas from the community on how to maximise the benefits from the Proposed Development to better align with the needs of stakeholders, for example the use of The Discovery Centre by schools.</p> <p>The Community Questionnaire (App Doc Ref 5.4.11.1) [APP-110] was a tool that helps to collect consistent information from a range of selected stakeholders where further information was required to inform the assessment of effects (in addition to existing publicly available information, or information already collated). Therefore, the questionnaire was applied to selected stakeholders related to particular community resources or particular potential effects. User count surveys were conducted during the summer period as this is the time when daily usage is most likely to be at its highest. This enables the assessment to consider a reasonable worst-case scenario to assessing impacts (i.e., where the most people are affected). These tools are deployed to focus on informing the assessment of effects, rather than gathering local opinion.</p> <p>Following the assessment of effects on noise, odour, vibration and lighting, the appropriate mitigation measures have been identified in the relevant ES chapters in order to mitigate the predicted effects on local receptors, including residential properties and schools. These assessments use industry standards in order to identify the level of effects that require mitigation. The Code of Construction Practice (CoCP) Part A and B (REP1-025 & REP1-027) includes measures to prevent and minimise potential impacts from the Proposed Development on noise levels, emissions and visual impacts.</p>
10.4	Historic environment	<p>The Applicant acknowledges the comments from SHH and notes that these largely replicate the comments provided in the Relevant Representation from SCDC [RR-004]). The Applicant has provided responses regarding the following points and refers back to the Applicant's Responses To Relevant Representations (App Doc Ref 8.2) [REP1-078].</p> <p><u>Level of temporary impact to Baits Bite Lock Conservation Area (Page 429 reference 10.4)</u> <u>The absence of some assets from the Historic Environment Chapter.</u></p> <p>The purpose of the historic environment assessment was clarified in an updated submission of the ES Chapter 13 (App Doc Ref 5.2.13) [REP1-023]. ES Chapter 13 (App Doc Ref 5.2.13) [REP1-023] reports significant effects and effects as a result of impacts on key assets.</p> <p><u>The degree of less than substantial harm, i.e., higher or lower end, with regard to Biggin Abbey and HLCA22 (Page 431 reference 10.4)</u></p>

Reference	Topic	Applicant's Response
		<p>In relation to the point referring to inconsistency between ES Appendix 13.4 Impact Assessment Tables (App Doc Ref 5.4.13.4) [AS-086] and the ES Chapter 13 (App Doc Ref 5.2.13) [REP1-023] with regard to permanent impact to Baits Bite Lock Conservation Area, the Applicant confirms that this was addressed in an updated submission of Appendix 13.4 [REP1-037].</p> <p><u>Consideration of the approaches to the conservation areas as part of their settings (page 427 reference 10.4)</u></p> <p>In relation to points in reference to where historic landscape character is related to the Landscape and Visual Impact Assessment (LVIA) (as reported within the ES Chapter 15 (App Doc Ref 5.2.15) [AS-035], which is subject to a separate assessment process), the Applicant stands by the assessment reported within the ES Chapter 13 (App Doc Ref 5.2.13) [REP1-023] regarding the Historic Landscape Character made in paragraph 5.2.13 and the Chapters associated appendices.</p> <p>With regard to the degree of impact, the Applicant stands by the assessment presented within ES Chapter 13 (App Doc Ref 5.2.13) [REP1-023]. Assessment of cumulative effects is summarised in Tables 4-2 and 4-3 within the ES Chapter 22 Cumulative Effects (App Doc Ref 5.2.22). The Applicant stands by the cumulative effects reported in Chapter 22 (App Doc Ref 5.2.22).</p>
10.5	Landscape and Visual Amenity: Impact of Proposed Lighting	<p><u>Operational lighting</u></p> <p>The Applicant sought confirmation of the approach to be used within the Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100] prior to its completion. The Applicant refers to Table 1-2 within the Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100], which details that the outcome of consultation with GCSP on the 14th of July 2022 was "Agreement that the baseline assessment could be undertaken via a desktop study. Proposed receptors list provided for review". Additionally, on Page 17 paragraph 3.3.4 of the Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100], that the objective Environmental Zone assessment was discussed and acknowledged within a meeting in August 2022. The Applicant also notes, they have committed to providing 0% Upward Light Ratio lighting (please see note 1 on page 79 and 82 of the Lighting Assessment (App Doc Ref 5.4.15.3) [AS-100]. The key difference in terms of limitations on obtrusive light between an E1 and an E2 Environmental Zone for locations such as Fen Quay is upward light (0% for E1 and 2.5% for E2). The Applicant has already committed to achieving the 0% Upward Light Ratio of a E1 Zone.</p> <p>The particular location highlight (Quy Fen) is outside the defined area highlighted within the lighting receptor and environmental zone plan shown in Appendix A of the Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100]. It should be noted that the assessment of Environmental Zone refers to district brightness and characteristic, and</p>

Reference	Topic	Applicant's Response
		<p>therefore due to the proximity of the Proposed Development to Cambridge and the surrounding small settlements is defined as a "Sparsely inhabited rural area".</p> <p>Due to the development of the lighting design, obtrusive light calculations have not been possible at this stage. However, the Applicant refers to Table 7-1 of the Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100], where on page 90 it is stated <i>"Designer to provide obtrusive lighting calculations in line with ILP GN01:2021, carried out with suitable methodology to prove compliance with the limits of obtrusive light described in Section 3.6 of this report. Obtrusive light calculation results to be provided to local planning authority and adhered to during the construction, maintenance and operational phase where legally compliant, practicable and safe to do so."</i></p> <p>A detailed list of the lighting requirements for each structure is provided within the Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100] and Lighting Design Strategy (App Doc Ref 5.4.2.5) [APP-072]. However, internal lighting designs and strategies have not been developed at this stage in the application. The Applicant refers to Requirement 7, Detailed Design, within the draft DCO [AS-011] which sets out the details submitted to the local authority for approval must accord with the details set out in the lighting design strategy.</p> <p>The extent of the lighting provided to Horningsea Road is subject to a risk assessment and consultation with the council, and therefore the full extent of the highway lighting is to be confirmed, and the noted extent is an assumed worst-case only. The Applicant will seek to minimise lighting where possible but will remain compliant with local highways requirements in relation to lighting. The Applicant accepts that there will be situations where limited lighting may be left on all night to facilitate reactive maintenance. However, this will not be the case every night and for consecutive nights unless explicitly required. The Applicant refers to Table 4-4 of the Lighting Assessment Report (App Doc Ref 5.4.15.3) [AS-100] where on page 47 it states <i>"In higher risk areas, for example on top of tanks/digesters, where lighting is critical for safety, the lighting control will be via manual on/off switch however an automatic reset will be incorporated into the lighting control to ensure lighting is only operational for a one night and only if the manual off switch is not operated when the maintenance staff leave the higher risk area"</i>.</p> <p>The Applicant cannot provide an estimate of the frequency of reactive maintenance, as this will only take place in response to emergencies and will not form part of routine maintenance. As the proposed WWTP would be a new facility the Applicant does not consider reactive maintenance at the existing Cambridge WWTP to be indicative of what could be expected at the proposed WWTP.</p>

Reference	Topic	Applicant's Response
		<p>The Applicant refers to the response provided to CCoC in relation to the points raised regarding lighting impacts to the Low Fen Drove Way Grasslands and Hedges CWS (see Table 3-3 RR-001 response to 4.3c within REP1-078).</p> <p>(o) In Section 9 of RR-001, it is stated: 9.1 The Proposed Development will have a significant adverse impact on the landscape both visually (from both the new structures and lighting proposed), but also as a result of the traffic generated by the Development during operation along its new access road'. SHH agrees with that analysis.</p> <p>The Applicant undertook a desk study (sources are provided within Table 2.5 within the ES Chapter 8 Biodiversity (App Ref Doc 5.2.8) [AS-026] which reviewed bat roost data submitted to the local records centre. The ecological assessment provided for the barn conversion found that the onsite structures and trees offered "negligible potential" for roosting bats and that the site may be used by foraging/commuting bats. The field surveys carried out by the Applicant (as illustrated in Figure 8.46 and 8.54 ES Book of Figures App Doc Ref 5.3.8) [AS-050] found evidence to support that the site is suitable to support foraging and commuting bats.</p> <p>The Applicant provided a response to the queries raised in RR-083 and RR-001 as part of a response [REP1-079] to the EXA ExQ1 5.17.</p> <p>The Applicant refers to the response provided to CCoC in relation to the points raised regarding lighting impacts (see Table 3-3 RR-001 response to 4.3c within REP1-078).</p> <p><u>Construction lighting</u></p> <p>In relation to construction lighting the Applicant draws attention to the construction program which restricts construction hours throughout the construction phase (see Table 5.1 of the Code of Construction Practice: Part A (Appendix 2.1, App Doc Ref 5.4.2.1) [REP1-025]. Construction lighting will not be in use every night throughout the construction phase and will not be required for large periods during that time due to the variation in available daylight throughout the year. This is the reason for the classification of "short-term".</p>
10.6	Odour	<p>Odour complaints for the proposed WWTP would be reviewed under the Environment Protection Act 1990 and action taken if deemed appropriate. Section 79(1)(d) of the Environmental Protection Act 1990 (Parliament of the United Kingdom, 1990) defines one type of 'statutory nuisance' as 'any dust, steam, smell or other effluvia arising on industrial, trade or business premises and being prejudicial to health or a nuisance'. Where a local authority is satisfied that a statutory nuisance exists, or is likely to occur or recur, it must serve an abatement notice. Failure to comply with</p>

Reference	Topic	Applicant's Response
		<p><i>an abatement notice is an offence. Best practicable means is a widely used defence by operators, if employed to prevent or to counteract the effects of the nuisance.'</i></p> <p>Activities included under the Environmental Permit would be regulated and enforced by the Environment Agency.</p> <p>The use of the 98th percentile within the odour assessment methodology follows best practice guidance from EA H4 and IAQM and is the standard approach when undertaking odour dispersion modelling. The WR correctly states that the 98th percentile means that there could be 7 days (175 hours of a calendar year) where odour concentrations could be higher than presented in the Odour Impact Assessment. However, the WR states that these would be undefined exceedances. It should be noted that there could be seven days where predicted odour is above the concentrations presented, however the odour assessment is based on odour emissions at their maximum predicted summer rates all year, which is highly conservative. There are no set odour standards that can be exceeded, rather thresholds are defined for when there is a likelihood of unacceptable odour pollution.</p> <p>The Written Representation is correct in identifying that the Application documents references benchmark odours from EA H4 and the IAQM guidance. The EA H4 benchmarks should be used to indicate the level of odour concentration that may indicate the likelihood of unacceptable odour and not the level of odour expected from a moderately offensive source.</p> <p>The IAQM guidance states that <i>'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 and can be considered on par with 'moderately offensive' odours'</i>. The IAQM provides additional detail on the odour effect descriptors for impacts predicted by modelling for moderately offensive odours. The odour concentrations are predicted by the dispersion modelling which are then assessed against the IAQM's moderately offensive odour effect descriptors for impacts predicted by modelling.</p> <p>The site boundary for the purposes of the odour assessment is the 'Earth bank'.</p> <p>The Odour Impact Assessment (App Doc Ref 5.4.18.2) [APP-138] includes all sources to represent odour emission from the whole Proposed WWTP and does not distinguish between regulatory requirements.</p> <p><u>Amenity</u></p>

Reference	Topic	Applicant's Response
		<p>The WR has correctly identified that footpaths are designated at 'low' sensitivity receptors. This is in accordance with IAQM guidance which indicates that low sensitivity receptors include surrounding land where <i>'there is transient exposure, where the people would reasonably be expected to be present only for limited periods of time as part of the normal pattern of use of the land. Examples may include industrial use, farms, footpaths and roads'</i>.</p>
10.7	Transport	<p>The Applicant notes the comments and has no additional points to add.</p>
10.8	Water resources	<p>The Environment Agency have indicated in their response to ExA1 15.2 [REP1-152] that, based on information provided they do not believe that any operational pollution control permits, flood risk activity permits, licences or other relevant consents would not be subsequently approved if the proposed development is consented.</p> <p>The Applicant confirms that the Environment Agency is in agreement with the proposals to Water Quality Monitoring Plan [REP1-046].</p> <p>The Environment Agency have indicated that they are in agreement with the findings of the WFD Assessment (App Doc Ref 5.4.20.3) [APP-153].</p> <p>The Applicant has remained in consultation with the Environment Agency in relation to updating the FRA (App Doc Ref 5.4.20.1) [APP-151] to account for the findings of the updated fluvial model. The updated FRA (App Doc Ref 5.4.20.1) will be provided at Deadline 3</p> <p><u>Groundwater protection</u> The Applicant has proposed pre-construction monitoring in relation to the Waterbeach pipeline.</p> <p>The need for an Appropriate Assessment relates to internationally designated sites and not to SSSIs, unless the SSSIs are also internationally designated sites. Stow-cum-Quy Fen SSSI and Wilbraham Fens SSSI are not internationally designated sites. Therefore, an Appropriate Assessment is not required to include these SSSIs.</p> <p>The Applicant has discussed the need for monitoring in relation to the Stow-cum-Quy Fen SSSI and Wilbraham Fens SSSI with the Environment Agency and Natural England. The Applicant submitted a draft Outline Water Quality Monitoring Plan at Deadline 1 which includes discussion of these SSSIs (App Doc Ref 5.4.20.3) [REP1-046]. The draft</p>

Reference	Topic	Applicant's Response
		<p>Outline Water Quality Monitoring Plan (App Doc Ref 5.4.8.23) has been reviewed and accepted by the Environment Agency and will be submitted again at Deadline 2.</p> <p><u>Water resources</u></p> <p>The Applicant notes the comments regarding strategic water resources. The Environment Agency in its capacity as regulator will assess water availability and the proposals presented within the draft Water Resources Management Plan 2024 for Anglian Water and the draft Water Resources Management Plan 2024 for Cambridge Water. The outcome of this review will inform, where relevant, their advice in relation to baseline flows and the determination of any water quality permits.</p> <p>The Applicant confirms that it has submitted applications for Water Discharge Final Effluent Permit for the Proposed Development and a temporary Interim Permit for the existing facility. The Applicant has discussed providing details of the applications for these Environmental Permits submitted to the Environment Agency as requested by Fen Ditton Parish Council at ISH 1. At present the Applications have not been deemed to be "duly made" so are not yet validated. Once the Environment Agency has completed the validation process, the applications will be made public and a two-month consultation period will begin before the Applications are then further determined. The release of unvalidated permits at this stage would be premature and potentially trigger the consultation phase on documents that have not yet been even initially assessed by The Environment Agency.</p> <p>The Applicant notes additional comments regarding the assessment of these applications but considers this assessment if for The Environment Agency to determine.</p> <p><u>Water Framework Directive Compliance Assessment and Biodiversity</u></p> <p>The Applicant notes the comments in relation to the HRA and is aware that the Environment Agency are the competent authority in relation to completing HRA in the case of determining environmental permits.</p> <p>The Applicant refers to Works No 39, the ES Chapter 8 (App Ref Doc 5.2.8) [AS-026] and Appendix C of the BNG Report (App Ref Doc 5.4.8.13) which explains how habitat compensation is sought and how the Applicant intends to achieve river unit gain.</p> <p>Design capacity</p>

Reference	Topic	Applicant's Response
		<p>The Applicant can confirm that the design capacity of the Waterbeach pumping station which processes the Waterbeach twin pipelines is 284l/s. In the event of any pumping station failure, which is configured as duty/assist/standby, the standby pumps would be triggered whilst any repairs are undertaken. Flows would therefore not overflow.</p>
Section 11 Funding		
11.1	Introduction	<p>SHH notes that concerns were raised on this topic in SHH Relevant Representation (Document Reference RR-035). The Applicant acknowledged the comments. The following application documents cover these issues, respectively:</p> <ul style="list-style-type: none"> • 3.2 Funding Statement [APP-013] • 7.5 Planning Statement [AS-128] • 2.1 Draft Development Consent Order [AS-139]. <p>The Applicant disagrees with SSH's specific comment that the Applicant has "not demonstrated that the requirements of the Compulsory Acquisition Guidelines can be met." Paragraph 17 of the Planning Act 2008: Guidance Related to Procedures for the Compulsory Acquisition of Land requires the Applicant to explain how the project will be funded, both in terms of acquiring the land and implementing the project and including the degree to which other bodies have agreed to make financial contributions and the basis on which such contributions are to be made.</p> <p>The Funding Statement [APP-013] is clear that the costs of acquiring the land will be met by the Applicant's own funds, as will the costs of delivering the Waterbeach Pipeline components of the project. With regards the relocation project, extensive detail has been provided by the Applicant, including in its Deadline 01 submissions as referred to below at paragraph 11.2, to explain the contractual commitments in force which will provide for its funding and delivery. The Applicant's position is further supported by the submissions made by Homes England [REP1-159 and REP1-160]. The requirements of the Compulsory Acquisition Guidance are clearly met.</p>
11.2	Funding Agreements	<p>SHH also comment on the funding agreements. The Applicant can confirm that those requested by the ExA in their ExQ1 have been provided in Deadline 01. Document References: REP1-121 Anglian Water Services Limited 8.8. Housing Infrastructure Fund Grant Determination Agreement (redacted) REP1-122 Anglian Water Services Limited 8.9 Master Development Agreement (redacted) REP1-123 Anglian Water Services Limited 8.10 HE Assessment of Cambridge HIF Bid Redacted.</p> <p>In response to specific questions asked:</p>

Reference	Topic	Applicant's Response
		<p>(i) Confirmation that the grant is a fixed cash sum limited to £227 million. <i>The Applicant confirms that the grant sum is limited to up to a maximum of £227 million.</i></p> <p>(ii) Explain why, given that the short tunnel option has been adopted, the grant has not been reduced to the lower sum for that option set out in the HIF Business Case of £167 million. <i>As per the Applicant's response to ExQ1 question 2.27, the parties to the HIF funding agreed the use of the higher number for bid was correct, to cover contingencies</i></p> <p>(iii) The purposes for which the grant may be used and the key milestones and break points in the grant agreements. <i>Please see Document REP1-121 Anglian Water Services Limited 8.8. Housing Infrastructure Fund Grant Determination Agreement (redacted)</i></p> <p>(iv) The identity of all organisations who can claim payments from the grant and for what purposes. <i>Please see Document REP1-121 Anglian Water Services Limited 8.8. Housing Infrastructure Fund Grant Determination Agreement (redacted)</i></p> <p>(v) The definition and budget for the Enabling Phase and the extent to which that grant has already been expended. <i>Please see Document REP1-121 Anglian Water Services Limited 8.8. Housing Infrastructure Fund Grant Determination Agreement (redacted)</i></p> <p>(vi) The date by which a 'cleared' site must be delivered for development and a definition of what constitutes the cleared site, in terms of demolition etc. <i>Please see Document REP1-121 Anglian Water Services Limited 8.8. Housing Infrastructure Fund Grant Determination Agreement (redacted)</i></p> <p>(vii) The latest programme for approval and construction of the relocated works and the decommissioning, demolition and remediation of the existing site prior to handover. <i>The Programme will be dependent on when consent is granted. Please see Document Reference: REP1-021 Anglian Water Services Limited 5.2.2 Chapter 2 Project Description, section 3 and Figure 3-1, 3-2</i></p> <p>(viii) The latest cost estimates for expenditure going forward on Enabling and Delivery that will be eligible for grant. <i>Please see the Applicant's responses to ExQ1.8.25-8.26 at Deadline 01 [REP1-79].</i></p>

Reference	Topic	Applicant's Response
		<p>(ix) Identify the specific defined AW entities who will fund any cost overruns and whether these have independent sources of funding, apart from the HIF grant. <i>The Applicant refers SHH to 3.2 Funding Statement [APP-013]</i></p> <p>(x) The ExA also asked various questions around what will happen if the DCO is not granted or if NECAAP is not adopted or if the grant terms are breached/not met, including contingency arrangements, which are not repeated here. <i>The Applicant responded to these questions in Document Reference REP1-079 Anglian Water Services Limited 8.3 Response to ExA's ExQ1</i></p>
11.1.1	Funding Agreements	Please see REP1-079 Anglian Water Services Limited 8.3 Response to ExA's ExQ1, responses to questions 2.31 and 2.32 which the Applicant believes responds to these points.
11.2	Missing Appendices	The appendices for the Site Selection Reports (App Doc Ref 5.4.3.1 to 5.4.3.5)[APP-074 to 078] were not provided with the reports as these are publicly available on the Applicant's Project Website and it was agreed that they would be submitted if required at the request of the Examining Authority (ExA). These appendices were requested for submission to the ExA at Deadline 2 and therefore the Applicant has now provided these.
11.3	Adequacy of HIF budget	Regarding the adequacy of the HIF budget, the Applicant refers to its answers to ExQ1.2.27 and ExQ1.8.25 to ExQ1.8.28 (8.3 Response to ExA's ExQ1) [REP1-079].
11.3	Enabling costs	The Applicant is unable to provide as the breakdown of the costs is commercially sensitive.
11.3.1	Integrity of Cost Estimates	In the Funding Statement (App Doc Ref 3.2) [AS-013] an explanation has been provided as to how it is expected that the construction of the Proposed Development and the acquisition of the land or rights over the land will be funded, as well as compensation arising from the exercise of powers of compulsory acquisition (as required by paragraphs 17 and 18 of the Compulsory Acquisition Guidance).
11.3.2	Conclusion	The Applicant has set out its position on these matters in its Deadline 1 submissions.
Section 12 Planning Balance		
12.2.3	Table 7 Assessment	The assessment made by SHH in Table 7 fundamentally ignores the very significant and manifold benefits that would be delivered by the decommissioning and release of the existing WWTP site which will enable regeneration and the

Reference	Topic	Applicant's Response
	of Weight of Benefits	<p>creation of a new city district. These benefits are described by the Applicant at paragraph 2.1.8 - 2.1.12 of the Planning Statement (App Doc Ref 7.5 - REP1-049) and elaborated in response to ExQ1-2.23 and ExQ1-7.35 (REP1-079). They are also described as 'substantial benefits' at paragraphs 6.116 and 7.14 respectively of the City Council's and the District Council's LIRs (REP1-128 and REP1-139). Enabling the realisation of these benefits is the key purpose of the Application. Ignoring this is, therefore, perverse since there is no other motivation for relocation.</p> <p>The partial list of benefits that are considered in Table 7 also ignores the responses provided by the Applicant to ExQ1-2.23, ExQ1-2.24 and ExQ1-13.12 (REP1-079) so that, by way of example, the presumption is made that improvements can be made to storm management and resilience on the existing site despite the fact that benefit can only be achieved by the use of the c2.5 km connecting tunnel from the existing WWTP to the new WWTP for attenuation. The achievement of operational improvements on the existing site would need to be incorporated into an existing and ongoing operational facility with mechanical and electrical equipment below peak efficiency and with less reliability and which has already been subject to a series of incremental improvements and upgrades. This means that new process elements would be subject to legacy placement (i.e., they will be more difficult to locate near to their counterparts and may instead have to be fitted into less suitable areas) where they would be less economical and not deliver the same process efficiency. Capital costs would be higher (in relative terms), operational efficiencies and improved workflow would be very difficult to achieve, maintenance time and costs will be increased, there would be increasing pressure on customers' bills and challenges to ensure the WWTP could keep within permit conditions for discharge or emission. The constraints imposed by the Safeguarding Area around the existing plant and the potential odour impacts on neighbours in its proximity would not be removed or be capable of being reduced to the extent capable of being achieved at the proposed WWTP.</p>
Section 13 DCO Powers and Provisions		
13.1	Introduction	The Applicant has received comments from SHH on the dDCO. The Applicant will consider these and address them as it considers necessary in the next draft DCO which it will submit at Deadline 3.
13.2 – 13.3	Draft CoCP and other Management Plans	The Applicant acknowledges the comments and concerns made on the draft CoCP and other Management Plans and will consider. In order to provide a comprehensive response to each of the many points raised on the CoCP and management plans, the Applicant will respond in full by Deadline 03.
Appendices		
SHH 05	Appendix A Health Survey	The Applicant notes the electronic survey carried out and places now weight on the results. It appears to have been carried out informally and the Applicant has no visibility of the survey methodology.

Reference	Topic	Applicant's Response
	Methodology & Results	
SHH 06	Appendix B Demolition Carbon Report by Cambridge University Dept. of Engineering	The Applicant has responded to these points in its comments on section 9 of SHH 04 above.
SHH 07	Request for Additional Locations to Include in Accompanied Site Inspection (ASI)	<p>With regards to the comments on the Applicants proposals for the ASI, the redline boundary shown on Appendix B is the Scheme Order Limits. The Applicant does not deem it necessary to include any areas outside of the Scheme Order Limits which relate to NECAAP as this is not part of the Proposed Development.</p> <p>The purpose of the plan submitted in Appendix B is to provide the routes and points which are to be viewed during the ASI, any plant or equipment currently not in use is marked as such on the site itinerary provided in the proposed ASI anything not marked as such is currently in use. The addition of the extra layers for the plan would deviate from the purpose of the plan and therefore the Applicant does not intend to update it.</p> <p>The Applicant notes SHH's proposals for the ASI, however it is the responsibility of the ExA to determine the locations which will be in the final ASI itinerary and therefore the Applicant has no further comment on these.</p>
SHH 08	Appendix C Design Critique	The Applicant has carefully considered the "Design Critique" provided by Save Honey Hill (SHH 08). The majority of the issues raised in the document have been previously addressed by the Applicant during consultation. The SHH comments do not appear to have taken into account the detailed narrative on design set out in the Design and Access Statement (AS-168), nor the issues detailed in the Environmental Statement, including in the alternatives chapter (AS-018), landscape chapter (AS-034), odour chapter (APP-050) or the Landscape, Ecological and Recreation Masterplan (LERMP, AS-066). Instead, SHH have sought to introduce a number of untested and uncostered alternative approaches to the broad Design Objectives, without clearly explaining why those alternative approaches, which have not been discussed with statutory consultees or reviewed by formal design panels, deliver an improved outcome against the objective tests in the NPSWW.

Reference	Topic	Applicant's Response
		<p>The Applicant only provides clarifications here in respect of the main issues in the SHH document, as follows:</p> <p>1.2: The woodland planting shown on the landscape masterplan in the Landscape, Ecological and Recreational Management Plan (LERMP) (App Doc Ref 5.4.8.14) [AS-066] has a multi-functional role, providing landscape screening but also new habitats for wildlife which will contribute to the overall biodiversity net gain of 20% to be delivered by the scheme together with recreational facilities. While SHH may wish to see space around the plant retained as biodiversity-poor intensive monoculture agriculture with no rights of public access, it is reasonable for the Applicant to conclude that a high level of biodiversity net gain and public access are important project benefits and to be preferred to the SHH proposals.</p> <p>1.3: It is not clear what "<i>inventive approach to the engineering</i>" is being proposed by SHH. Having selected the best performing site for the relocated plant, the Applicant has selected appropriate technology, balancing a wide number of criteria to deliver environmental performance which is aligned with the NPSWW, including, as discussed above, in respect of odour containment and visual impact. This is also discussed at 4.6.8 above.</p> <p>1.4: Carbon and other environmental performance indicators are clearly defined in the Environmental Statement and secured through Requirements in the dDCO</p> <p>2.0: The Applicant has relied upon visual impact assessment delivered in line with professional guidance, including the production of photomontages. The applicant believes that this approach is to be preferred to the unverified and subjective rough sketches provided by SHH.</p> <p>In response to 2.1: The Applicant agrees that narrow belts of vegetation lining field boundaries, roads, watercourses and the dismantled railway line are typical of the local landscape character of the area and that they provide a layered background to the view. The LVIA (App Doc Ref 5.2.15) [AS-034] describes these vegetation belts in the baseline survey and how they screen or partially screen the proposed WWTP site from the majority of the study area.</p> <p>Figure 3 in SHH 08 illustrates how the planting mitigation and earth bank of the landscape masterplan (App Doc Ref 5.4.8.14) [AS-066] will shorten existing open views from the area near the Proposed WWTP site. The Applicant agrees that the Proposed WWTP will form the new background to the view from Low Fen Drove Way and much of Horningsea Road. The view from the disused railway line, Snout's Corner and southern end of Low Fen Drove Way is already partly screened by existing vegetation and the fields in the foreground of the view are outside the site and will remain open. From the Horningsea Road bridge over the A14, the structures of the Proposed WWTP will be prominent in the view,</p>

Reference	Topic	Applicant's Response
		<p>but the majority of them will be below the skyline. However, the cluster of structures at the southern end of the site, including the digesters, will break the skyline. The photomontages (App Doc Ref 5.4.15.1) [APP-127] illustrate how the earth bank and mitigation planting will change the view.</p> <p>The mitigation planting shown on the landscape masterplan (App Doc Ref 5.4.8.14) [AS-066] is there to screen the Proposed WWTP from the surrounding landscape. The woodland around the perimeter of the site does not form a continuous belt around it but is arranged in a series of belts, separated by rides between 15 and 30m wide. There will be views into the site along the rides to the grasslands surrounding the earth bank.</p> <p>In response to 2.2: SHH 08's proposal to raise the landform between the site and Horningsea, Biggin Abbey and Fen Ditton would screen the site from these locations but would have a similar effect of closing the view as the woodland belts of the landscape masterplan (App Doc Ref 5.4.8.14) [AS-066] of will provide screening but also new habitats for wildlife and will contribute to an overall biodiversity net gain of 20% to be delivered by the Proposed Development.</p> <p>In response to 2.6: b) As described in the LVIA reported within the ES Chapter 15 (App Doc Ref 5.2.15) [AS-034], the visitor car park (outside the earth bank) will be lit during office hours from Monday to Friday. The gateway building will be lit during working hours, but light pollution will be mitigated by the installation of blinds or screens over the windows. Within the earth bank, lighting columns along pathways, at building entry points and in the staff car park will be a maximum of 5m high. This lighting will be activated by motion sensors, with 30-minute timers. Task lighting on the proposed WWTP (including on tops of structures) will be used when required. The lighting design is described in detail in the Lighting Design Strategy (Appendix 2.5, App Doc Ref 5.4.2.5).</p> <p>c) As described in the LVIA reported within the ES Chapter 15 (App Doc Ref 5.2.15) [AS-034], the lighting on the Proposed WWTP will be designed and maintained to minimise skyglow, reduce glare and eliminate light spill. The 5m high earth bank will screen much of the lit area on the site.</p> <p>In response to 2.7:</p> <p>a) The proposed WWTP will be visible in the background of mainly filtered views from a few places in the Fen Ditton Conservation Area, it will not be visible from the Horningsea Conservation Area and the upper parts of the structure may be visible in glimpsed views from Baits Bite Lock Conservation Area. Biggin Abbey and the Proposed WWTP will be visible in the same view but again, only from a few locations because of the screening provided by the avenue leading to Biggin Abbey and the embankment of the Horningsea Road as it rises to go over the A14.</p>

Reference	Topic	Applicant's Response
		<p>3.0 Community consultation</p> <p>The adequacy of the Applicant's community consultation is acknowledged in the Adequacy of Consultation responses received from the relevant host authorities (AoC-001-009). The Applicant does not therefore intend to respond in detail to this section.</p> <p>The Applicant reviewed all consultation responses as required by Section 49 of the Planning Act 2008, including feedback from local communities as required by Section 49 (3)(a). A full record of all responses received under Section 47 of the 2008 Planning Act (Duty to consult local community), how the Applicant has had regard to these responses, and whether the feedback resulted in a change to the proposals is available in Appendix 6.1.2: Applicant Regard to Section 47 Consultation Responses (APP-166).</p> <p>The Applicant strongly disagrees with many of the assertions made in this section including:</p> <p>3.1(a) "<i>Little explanation of the reasoning</i>" behind highways access decision. The Phase 2 consultation materials (Application Document Reference 6.1.17) provide a clear explanation of the reasoning at pages 24-27, including in respect of the non-compliance of SHH's preferred solution with Department for Transport policy</p> <p>3.1(c) "<i>rejection of numerous sites..... was not explained in any detail</i>". Three detailed reports supported by technical appendices were consulted on at Phase 1 consultation in support of the final shortlist (see APP-075, APP-076, APP-077)</p> <p>3.1(d) "<i>selection of Honey Hill.... was subject to cursory justification</i>". The Stage 4 site selection report (121 pages, APP-078), drawing on a dedicated consultation round in respect of the final three sites, could not be described as "cursory" in any objective sense of the word.</p> <p>3.1(j) SHH's "secret world" design is not founded in reality. It would not be achievable within the funding framework provided by Homes England. The creation of this design would require structures to be sunk at excessive expense, increased health and safety risk and increased risk of environmental harm. It is interesting to note that all four examples of "high quality design" promoted by SHH (figure 17) draw heavily on the principle of "strong identity" which SHH oppose at 3.1(j). The adoption of a strong design identity is supported in the National Infrastructure Commission's Design Guidance.</p>

Reference	Topic	Applicant's Response
		<p>In response to section 4 on connectivity, the Applicant refers to section 6 "Traffic access arrangements" of the alternatives chapter of the Environmental Statement (AS-018), and particularly paragraph 6.1.8 as to the reasons why a direct access from the A14 would not be possible (SHH sections 4.1 and 4.4)</p> <p>SHH's preference for an alternative pathway (4.2d) is noted. The Applicant considers that landowner consent to such a route would be unlikely, and, unlike the route proposed by the Applicant, it would give rise to increased environmental harm as it would not rely upon an existing hard surface.</p> <p>In response to section 5 .1:</p> <ul style="list-style-type: none"> a) The earth bank forms part of the overall landscape masterplan (App Doc Ref 5.4.8.14) [AS-066] and is intended to provide screening of the majority of the structures of the site from all directions and integration of the proposed WWTP into the landscape. The earth bank is not a single structure but is made up of four curved landforms. The outer slopes of the landforms will vary in gradient between 1:2.5 and 1:5, softening their profile. The top of the earth bank will be flat, with a wide area for planting and where the curved landforms slope down and intersect, the planting will overlap, giving the appearance of layered tree belts crossing the slope of the earth bank. This is illustrated in Figure 3.5 in the LERMP (App Doc Ref 5.4.8.14) [AS-066]. The photomontages (App Doc Ref 5.4.15.1) [APP 127] show that from distant locations, the earth bank merges in the view with existing hedgerows between the viewpoint location and the proposed WWTP and that the earth bank does not have a strong presence in the landscape owing to its height in relation to its width. Three concept designs were initially developed prior to the second stage of consultation and the process by which the circular earth bank design was adopted is set out in the LERMP (App Doc Ref 5.4.8.14) [AS-066]. b) The landscape masterplan (App Doc Ref 5.4.8.14) [AS-066] has been developed to integrate multiple functions specifically landscape mitigation, ecological mitigation, surface water drainage management, and formalising the way the land is accessed. The design has sought to minimise the land permanently required whilst providing sufficient space to achieve various functions. Furthermore, the land required for the proposed WWTP has been designed to account for future adaptation requirements in order to deliver a resilient facility capable of operating effectively to account for predicted climatic conditions. <p>In response to section 5.2</p> <ul style="list-style-type: none"> a) While the LVIA reported within the ES Chapter 15 (App Doc Ref 5.2.15) [AS-034] evaluated impacts in years 1 and 15 of operation, the tree and woodland planting shown on the landscape masterplan in the LERMP (App Doc Ref 5.4.8.14) [AS-066] will start to screen the Proposed WWTP, well before 15 years of operation have elapsed. Figure 3.7

Reference	Topic	Applicant's Response
		<p>in the LERMP App Doc Ref 5.4.8.14) [AS-066] shows a belt of initial planting 7m wide along the site boundary with the A14 and along part of the site boundary with Horningsea Road and Low Fen Drove Way. This will be planted at the start of construction and will start screening the site before construction is completed. The LERMP describes the measures that will be implemented to aid the establishment and growth of the planting on the earth bank and around the perimeter of the site. This includes weed control, irrigation and pruning. The trees and hedgerows on the earth bank will be watered during periods of drought for the first five growing seasons after planting. Trees will be planted in early winter to aid maximum root establishment and species selected to grow on the earth banks which tolerate the drier growing conditions found in East Anglia.</p> <p>b) The heights of many of the structures in the proposed WWTP have been reduced since the initial photomontages were produced. Updated photomontages (App Doc Ref 5.4.15.1) [APP 127] show fewer structures visible above the earth bank. It is important to note that the photomontages should be viewed at the correct scale. Photomontages with a 90 horizontal degree field of view should be viewed at A1 paper size and those with 39.6-degree horizontal degree field of view should be viewed at A3 paper size. If viewed at the correct paper size, the scale of the image in the photomontage will be similar to the scale of the proposed structures in reality.</p> <p>In response to section 5.3</p> <p>a) The applicant acknowledges that the proposed WWTP site is largely screened from the east and potential visual receptors with a view of the site, such as at Quy Mill, are more distant from the site than those to the west.</p> <p>b) The applicant acknowledges that the proposed WWTP will be more visible from the west than the east. The earth bank and planting on the landscape masterplan (App Doc Ref 5.4.8.14) [AS-066] aims to screen these views of the new structures.</p> <p>In responses to 5.4, 5.5:</p> <p>a) The LVIA reported within the ES Chapter 15 (App Doc Ref 5.2.15) [AS-034] describes how the woodland and tree planting of the landscape masterplan (App Doc Ref 5.4.8.14) [AS-066] will make the landscape of the proposed WWTP more wooded and less open in views from the north and west. It will appear to merge with the layers of tree and woodland belts in the background of existing views from these directions. In response to comments made during consultation with Greater Cambridge Shared Planning (4th May 2022), the landscape masterplan was modified to reduce the scale of woodland planting, breaking it up into separate blocks, with linear gaps and open glades to allow views into the meadows surrounding the earth banks. The arrangement of the woodland blocks was carefully considered to allow views into the site but maintain the screening of the Proposed WWTP from the surrounding landscape.</p>

Reference	Topic	Applicant's Response
		<p>b) Existing vegetation such as along the dismantled railway line, the A14 and field boundaries will provide screening of the proposed WWTP in construction and operation. The planting on the landscape masterplan will use the same species as are found growing in the area around the site to integrate the new planting with the existing vegetation.</p> <p>5.6, 5.7, 5.8, 5.9 The Applicant has developed the landscape masterplan through engagement via Biodiversity and Ecology Technical Working Group (TWG), the Landscape and Heritage TWG, the Public Rights of Way TWG, and one to one meetings with stakeholders, with particular input from Natural England, The Environment Agency, Greater Cambridge Planning, the National Trust, The Wildlife Trust, The RSPB, and Cambridge Past Present and Future. In doing so the design has, as indicated in section 3 of the LERMP (App Doc Ref 5.4.8.14)[AS-066] sought to contribute to the aspirations of the Cambridge Nature Network opportunity areas for nature recovery (see Figure 3.8 in the LERMP (App Doc Ref 5.4.8.14) [AS-066] and considered the Wicken Fen Vision in relation to grassland habitat types included as part of the landscape masterplan as well as providing a potential new component and extension to the stepping stone, core area, and corridor areas of the Cambridge Nature Network.</p> <p>In relation to the use of agricultural land the Applicant notes that the land required for the landscape masterplan and proposed WWTP has been selected to balance space needed for multiple purposes whilst limiting impacts to agricultural land.</p> <p>In relation to the point raised in relation to alternatives rights of way for changed connectivity the design seeks to formalise the way people are currently accessing this area and not support intensification of use of existing connections.</p> <p>In response to section 6,</p> <ul style="list-style-type: none"> a) The Applicant refers to the Design and Access Statement section 7 (AS-168) which sets out information in relation to the approach to finishes including colour contexts. The Applicant also notes that the detailed design, including finishes will be provided to the local authority for approval. b) The Applicant agrees that the design should provide a modern workplace inclusive of educational resource and notes the comments in relation to design of the Gateway Building. <p>In response to Section 7 Climate:</p> <ul style="list-style-type: none"> • Within application document 5.2.10 Environmental Statement Chapter 10 - Carbon [APP-042] an assessment of decommissioning the existing Cambridge WWTP is quantified within Section 4.

Reference	Topic	Applicant's Response
		<ul style="list-style-type: none"> • The standards and methodology used to assess carbon impacts associated with the proposed development are set out in Section 2 of Environmental Statement Chapter 10 'Carbon' (Doc 5.2.10) [APP-042]. • The Applicant confirms that further design optimisation opportunities to reduce carbon impacts will continue to be investigated during detailed design of the proposed development as mentioned in the Summary of Chapter 10 of the Environmental Statement (Doc 5.2.10) [APP-042]. • The proposed location of solar panels is on the inside face of the bund as shown on the Design Plans of the proposed wastewater treatment plant (Doc 4.9, drawing 4.9.1) [REP1-019]. • The design basis for the proposed sewer tunnel sizing, including the provision for storm flows, is set out in Environmental Statement Chapter 20 Appendix 20.10 'Storm Model Report' (Doc 5.4.20.10)[APP-160]. • The design philosophy for the proposed development has been to pursue a 'no detriment' position within the catchment, i.e., no increase in flooding as stated in Section 4.3 of Environmental Statement Chapter 20 Appendix 20.10 'Storm Model Report'. <p>In response to Section 8 Safety and Security, application document ES Chapter 21 Major Accidents and Disasters (Doc 5.2.21) [AS-042] assessed the vulnerability of the Proposed Development to major accidents and to demonstrate how that vulnerability is to be managed to prevent or reduce potential significant adverse effects to environmental receptors, including local communities.</p> <p>The security measures to be implemented for the Proposed Development will be in accordance with the level of security required by the Security and Emergency Measures Direction (SEMD) as stated in Table 1-2 of the ES Chapter 21 Major Accidents and Disasters [AS-042]. This Direction issued under the Water Industry Act requires the Applicant to maintain the Proposed Development in the interests of national security or to mitigate the effects of any civil emergency that may occur. Physical security will also be in alignment with industry standards guidance from the National Protective Security Authority (NPSA) as also stated in Table 1-2 of ES Chapter 21. The mitigation measures for malicious attack relating to vandalism and sabotage will include perimeter fencing, security/CCTV surveillance equipment and security-controlled access as stated in Table 2.1 of ES Chapter 21.</p>
SHH 09	Appendix E Additional Reference Documents	The Applicant has no comments.
SHH 10	Appendix D Mapping	The Applicant has no comments.

Reference	Topic	Applicant's Response
	Diagrams (for reference at Sections 7.5 and 7.5.1)K	
SHH 11	Appendix F Summary	The Applicant assumes this is the same as SHH 14 below.
SHH 14	Summary of SHH 04 Written Representations.	The Applicant has responded to the detailed Written Representation and has no comments on the summary.
SHH Video	N/A	The LVIA reported within the ES Chapter 15 (App Doc Ref 5.2.15) [AS-034] has assessed the likely impacts on views from the surrounding villages and does not concur with all of the statements in the film about the visibility of the Proposed Development from them. The proposed WWTP would not dominate views from Horningsea itself, as stated in the film, but residents using Horningsea Road to go into Cambridge will be aware of it – especially in the early years of operation. The residents of Quy are unlikely to be aware of the proposed WWTP but there might be glimpsed views from Quy Mill (upper floors).
Oral Submission		
9.5.3 The report notes that the assessment uses a simple model, based on readily available average data and proxy indicators for likely carbon emissions and that the results may therefore not be reliable. Although some of the assumptions are set out, it is a 'black box' analysis, and the results have not been validated, against, for example, other sub-regional		<p>This strategic study's principle purpose is to provide supplementary information related to carbon for the EIA as part of the DCO process. It is a high-level comparative assessment that broadly follows the RICS carbon assessment principles and incorporates a range of scenarios designed to make best use of the available data. While a level of uncertainty is inherent in this type of analysis, the findings themselves (i.e. that higher density housing that is located more centrally to the City of Cambridge will generally lead to lower emissions than lower density housing that is further away from the City) are not that surprising. Furthermore, the magnitude of the difference between the modelling scenarios is such that we can have confidence in the overall direction of the findings, even if there is some variation in the actual amount of emissions that are realised in practice.</p> <p>Taking account of future socio-economic and demographic changes is beyond the scope of this assessment. The key variable that Anglian Water is able to influence here is where the housing is delivered in Greater Cambridge, whether that is at the North East Cambridge site or in a generic suburban location where 8,350 homes could feasibly be delivered.</p>

Reference	Topic	Applicant's Response
	<p>transport modelling or socio-economic survey data, which is available for Greater Cambridge. The analysis is, in crucial respects, static and takes no account of future socio-economic or demographic change over the assessment period.</p>	<p>If there were differences between the proposed and counterfactual developments in terms of their socio-economic and demographic attributes, then this would mean that emissions have been displaced from another development. For example, if the counterfactual development housed a higher proportion of retirees than the proposed development, then it might be reasonable to expect that the operational carbon emissions associated with housing would be higher (due to higher heating-related emissions, for example). However, in practice, these additional retirees would not be being 'created' but rather be moving in from elsewhere (which would then potentially see a proportionate reduction in heating-related emissions).</p> <p>As such, to isolate the impact that changing this location has on housing and commuting emissions and compare the developments on a like-for-like basis, socio-economic and demographic variables are assumed to be the same across the two modelling scenarios.</p>
	<p>9.5.4 Aspect 1: The relocation or retention and expansion of the WWTP, which draws on the Applicant's assessment reported in Chapter 10 of the ES. It is not stated whether, under the relocation scenario, the carbon emissions from the demolition and remediation of the existing works have been included in the analysis of either Aspect 1 or 2 or at all.</p>	<p>Emissions from the demolition of the existing WWTP are not included in the Environmental Impact Assessment (EIA). It is not part of the scope of this proposal and that work will be done by the future developer and considered as part of a separate planning application. It is likely to include the effects of emissions from plant used in demolition, taking into account the re-use of materials including secondary aggregate, recovered steel and other equipment. Chapter 2 Project Description paragraph 1.4.7 states that consent is not sought under the Development Consent Order for the subsequent demolition or redevelopment of the Cowley Road site. However, the Applicant has undertaken an assessment of the indicative scale of demolition emissions based on structure volumes and site area to be cleared on the existing site to demonstrate the likely scale of these emissions. These are outlined below and will be provided by Deadline 3 as part of an updated 7.5.2 Planning Statement Strategic Carbon Assessment [APP-206].[MOU1] [PD2] Anglian Water's estimate of the emissions associated with demolition, material processing, transport away from site, and ground remediation is 3,865 tCO₂e. If this is added to the mid-point estimate of embodied and operational emissions for the WWTP (71,000 tCO₂e), these emissions represent ~5% of total WWTP emissions. They represent ~0.3% of total emissions for the proposed development under the mid-point scenario (1,400,000 tCO₂e). Several conservative assumptions have been made with this estimate, including locating the disposal site 50km away from the demolition site (there are many things that could be done to reuse aggregate on site or locally) and that the plant and transport is exclusively diesel powered.</p> <p>The report commissioned by Save Honey Hill Group also estimates the emissions associated with decommissioning of the site, demolition of structures, material processing and ground remediation. It arrives at a slightly lower but similar estimate of 2,800 tCO₂e. If this added to the mid-point estimate of embodied and operational emissions for the WWTP (71,000 tCO₂e), these emissions represent ~4% of total WWTP emissions. They represent ~0.2% of total emissions for the proposed development under the mid-point scenario (1,400,000 tCO₂e).</p>

Reference	Topic	Applicant's Response
		<p>Although these emissions are not negligible, they are not significant enough to change the key finding of this comparative assessment. A note has been added to the Strategic Carbon Assessment report detailing these demolition emissions.</p>
<p>Aspect 2: This is described as 'housing', but is actually 'emissions from buildings'. On page 9, it is noted that the modelling was based on 5,600 houses and other development on the core site and has been scaled up to consider 8,350 houses and other development at both locations. The assessment uses standard emissions factors per sq m for embodied construction emissions and for space heating. As such, the analysis ignores how either of the developments considered will be occupied and used now or in the future.</p>		<p>Whole Life Carbon (WLC) targets are used to assess the embodied carbon of the housing and associated infrastructure and Energy Use Intensity (EUI) targets to assess the operational carbon. EUI refers to the total amount of energy used per square foot annually in a building and hence does account for emissions associated with occupation of the development. Project aspiration, good practice and business-as-usual options were provided by Useful Projects that provide a range of embodied and operational carbon targets based on the types of building that are developed, the materials that are used, and the energy efficiency that is achieved.</p>
<p>Aspect 3: This is described as 'commuting'. The extent to which the analysis cover all forms of motorised travel is unclear. The analysis uses two present day average household vehicle ownership</p>		<p>The Greater Cambridge Local Plan – Strategic spatial options appraisal: implications for carbon emissions formed the basis of our operational carbon transport modelling, the methodology is summarised below. Operational transport carbon emissions were estimated using local BEIS and Census per capita carbon emissions data. This was then calibrated on a scale from 0-10 representing the potential for each mode of travel in each location type, undertaken by an experienced transport consultant using insight on travel distances and modal share from the Cambridge Sub-Regional Transport Model. A zero carbon policies option was modelled, which included an increase in</p>

Reference	Topic	Applicant's Response
	<p>counts for Cambourne and City of Cambridge. It then applies a variety of vehicle fleet factors to generate operational carbon emissions. No information is given as to the sources of annual trip lengths by mode for the two locations.</p>	<p>sustainable travel initiatives and a faster roll-out of electric vehicles compared to the business-as-usual scenario. Our mid-point estimate was an average of these two scenarios.</p> <p>This transport modelling set out six location categories within which the emissions of each home would be expected to be similar: urban; edge of city greenbelt; edge of city non-greenbelt; new settlement; village; and public transport corridor. The North East Cambridge site was categorised as 'urban', given that it is located close to the City of Cambridge and adjacent to a mainline railway station. The counterfactual housing development, given its scale, would likely be well connected to public transport and was hence categorised as a 'public transport corridor', the second lowest location category in terms of transport emissions per home. The modelling therefore accounted for the commuting patterns that would likely occur in these different residential neighbourhoods.</p> <p>In terms of embodied carbon transport modelling, Acorn profile overviews were used that detail vehicles per household data for Cambridge City and Cambourne. These figures were scaled using average lifespan of vehicle data (Society of Motor Manufacturers and Traders data), average vehicle mileage data (MOT data), share of the new car market over time by type of vehicle data (based on SMMT data), and vehicle manufacturing emissions (based on International Council on Clean Transportation data).</p>
	<p>9.5.5 The assessment presents three carbon reduction scenarios ranging from 'business as usual' to 'zero carbon' as well as two delivery scenarios. The optimistic delivery scenario, the delivery of all 8,350 dwellings by 2042, ie close to 1,000 houses a year at either location, is very unrealistic and a slower rate of delivery more in line with those set out in the GCLP FPs, the 'conservative' scenario, is more likely to occur.</p>	<p>The conservative scenario informed the overall results that are set out in the non-technical summary of the report. However, it is important to note that changing the pace of the housing delivery does not significantly affect the magnitude of the difference between the proposed development and counterfactual in terms of emissions produced. For example, under the conservative housing scenario, the counterfactual produces ~36% more emissions than the proposed development. Under the optimistic scenario, the counterfactual produces ~38% more emissions than the proposed development. The findings presented here are under the mid-point policy scenario, but are consistent across all three policy scenarios. These findings demonstrate that, regardless of the pace of housing delivery, the key finding of this study remains unchanged.</p>

Reference	Topic	Applicant's Response
<p>9.5.6 This kind of simple spatial comparison analysis in Aspects 2 and 3 is subject to high levels of uncertainty, which cannot be easily quantified. It uses a 'snapshot' of available parameters for the modelling. Implicitly, important socio economic, transport and demographic variables have been kept constant temporally and spatially in the analysis.</p>		<p>This strategic study's principle purpose is to provide supplementary information related to carbon for the EIA as part of the DCO process. It is a high-level comparative assessment that broadly adheres to overarching RICS carbon assessment principles and incorporates a range of scenarios to account as best as possible for the available data. While a level of uncertainty should be attributed to the results, the magnitude of the difference between the modelling scenarios is such that we can have confidence in the overall findings, i.e. that the counterfactual (alternative) scenario will generate significantly more emissions than Anglian Water's proposed relocation project. This key conclusion holds even if there is some variation in the absolute amount of emissions that are realised.</p> <p>Taking account of socio-economic and demographic changes is beyond the scope of this assessment. The key variable that Anglian Water are able to influence here is where the housing is delivered in Greater Cambridge, whether that is at the North East Cambridge site or in a generic suburban location where 8,350 homes could feasibly be delivered.</p> <p>If there were differences between the proposed and counterfactual developments in terms of their socio-economic and demographic attributes, then this would mean that emissions have been displaced from another development. For example, if the counterfactual development housed a higher proportion of retirees than the proposed development, then it might be reasonable to expect that the operational carbon emissions associated with housing would be higher (due to higher heating-related emissions). However, this does not mean that the counterfactual development is generating more emissions in and of itself as it is not creating extra retirees, it is just shifting the emissions from another development.</p> <p>As such, to isolate the impact that changing this location has on housing and commuting emissions and compare the developments on a like-for-like basis, socio-economic and demographic variables are assumed to be the same across the two modelling scenarios.</p> <p>Given that Aspect 3 relates to specifically to transport, the methodology does account for the impact that spatial and temporal variables have on emissions. Operational transport emissions were modelled using transport emissions per home data that was based upon location-dependent factors, whilst embodied transport emissions were modelled using number of vehicles per home data, which was also location-specific. These emissions figures account for the decarbonisation of the electricity grid, the roll-out of electric vehicles, and the implementation of sustainable travel initiatives over time.</p>
<p>9.5.7 The crudeness of the assumptions made invalidates the conclusions drawn about overall carbon emissions. The most</p>		<p>The relocation project will enable the delivery of 8,350 new homes, both at the core site and in the surrounding area, and the delivery of this number of homes was therefore modelled for the proposed development. Therefore, in order to undertake a comparative assessment, we also modelled the delivery of 8,350 homes for the counterfactual scenario. If 5,600 homes were modelled, the same proportional difference between the proposed development and counterfactual would be found.</p>

Reference	Topic	Applicant's Response
	<p>questionable of those assumptions are: i) Extent of compared developments: the assessment should only have considered the development that could be placed on the core site or the Applicant's site (at most, 5,600 houses and related development), not any additional development that might take place within the wider NECAAP area under the relocation scenario</p>	
	<p>ii) For Aspect 2, the analysis ignores the different ways in which dwellings will be occupied and used at the two compared locations. In reality, there are likely to be considerable differences in the numbers of residents, household typology, tenure mix, age profiles, employment, income and other social characteristics between the two compared developments.</p>	<p>Taking account of socio-economic and demographic variables, such as those listed above, is beyond the scope of this assessment. The key variable that Anglian Water are able to influence here is where the housing is delivered in Greater Cambridge, whether that is at the North East Cambridge site or in a generic suburban location where 8,350 homes could feasibly be delivered.</p> <p>If there were differences between the proposed and counterfactual developments in terms of their socio-economic and demographic attributes, then this would mean that emissions have been displaced from another development. For example, if the counterfactual development housed a higher proportion of retirees than the proposed development, then it might be reasonable to expect that the operational carbon emissions associated with housing would be higher (due to higher heating-related emissions). However, this does not mean that the counterfactual development is generating more emissions in and of itself as it is not creating extra retirees, it is just shifting the emissions from another development.</p> <p>As such, to isolate the impact that changing this location has on housing and commuting emissions and compare the developments on a like-for-like basis, the number of residents and other socio-economic and demographic variables are assumed to be the same across the two modelling scenarios.</p> <p>The purpose of comparing this assessment is to compare the proposed development to a reasonable counterfactual, i.e. where the equivalent number of homes and residents could be delivered and housed elsewhere in Greater</p>

Reference	Topic	Applicant's Response
		<p>Cambridge. Therefore, the number of residents is also the same for both developments so that we can make the assessment on a like-for-like basis.</p>
	<p>iii) In the analysis, the assumption is made that the types of housing development will be different at the two locations, in particular that average dwelling size at the suburban location will be 100 sqm GIA mainly low rise housing and that at NECAAP will be apartments averaging 77 sqm per dwelling ie 30% larger at the suburban location. More public realm per dwelling is also assumed at the suburban location. The argument advanced for making the different dwelling size assumptions is that NECAAP is a 'unique location' and that there will be real differences in market demand. This may be correct, but it means that the analysis is comparing two entirely different hypothetical resident communities. It is possible, but entirely unevidenced, that floorspace per person</p>	<p>The North East Cambridge site is unique given that it is Cambridge's last major brownfield site, is located close to the City of Cambridge and adjacent to a mainline railway line. The proposed development's buildings are expected to be mid-rise apartment blocks that enable the delivery of high density residential units (average unit size of 77m2 GIA). In terms of a settlement that could represent a reasonable median comparator for the purposes of this assessment, it is unreasonable to compare the proposed development site both with a dispersed village settlement, or with an identical site in terms of housing density and location, given that it is these characteristics that make the proposed site unique. Hence, a generic suburban settlement, that has characteristics broadly in line with the sites on which 8,350 new homes could feasibly be delivered in Greater Cambridge, was chosen as a reasonable median comparator. In this case, Useful Projects used Northstowe as a suitable proxy. Residential units would largely be delivered via houses and low-rise apartment blocks in this location, which are generally lower density than mid-rise apartment blocks and have a larger average residential unit size (average unit size of 100 m2 GIA).</p> <p>Increased market demand for larger homes in suburban locations and National Space Standards (NSS) requirements in suburban locations compared to urban locations are two key factors that underpin why there is a difference in floorspace between the proposed and counterfactual scenarios.</p> <p>It is unsurprising that a less dense development with a larger GIA (the counterfactual) produces significantly more emissions than a more dense development with a smaller GIA (the proposed development).</p> <p>It is reasonable to conclude that a less dense development with a larger GIA (the counterfactual) will produce significantly more emissions than a more dense development with a smaller GIA (the proposed development).</p> <p>Furthermore, we have conservatively modelled the same WLC embodied carbon factors for both the proposed development and counterfactual sites. This is likely to reduce the magnitude of the difference between the proposed site and counterfactual in terms of emissions, given that the North East Cambridge site will be a brownfield site and is likely to have a significantly lower infrastructure load and therefore lower embodied carbon emissions.</p>

Reference	Topic	Applicant's Response
	<p>will be higher at the suburban location, partly reflecting differences in house prices and housing choices made by households at different stages in their life cycle. The difference in dwelling size and public realm area assumed accounts for all of the differences in embodied and operational carbon emissions between the two locations reported under Aspect 2.</p>	
	<p>iv) The analysis uses simple per dwelling parameters for vehicle ownership and trip making, based on two questionable sets of data: an average for the whole city of Cambridge and for the free-standing new settlement at Cambourne. Within the City, there are likely to be significant differences in these parameters in different residential neighbourhoods across the City, which is not explored. Cambourne, as a newly built settlement, will have an age, social and</p>	<p>For the embodied carbon transport modelling, Acorn profile overviews were used that detail vehicles per household data for Cambridge City and Cambourne. These locations were used to reflect the fact that the North East Cambridge site, given its urban location close to a mainline railway station, will likely have lower car ownership than the counterfactual housing development, which would be a development similar to Cambourne and Northstowe.</p> <p>The Greater Cambridge Local Plan – Strategic spatial options appraisal: implications for carbon emissions formed the basis of our operational carbon transport modelling. Operational transport carbon emissions were estimated using local BEIS and Census per capita carbon emissions data. This was then calibrated on a scale from 0-10 representing the potential for each mode of travel in each location type, undertaken by an experienced transport consultant using insight on travel distances and modal share from the Cambridge Sub-Regional Transport Model. A zero carbon policies option was modelled, which included an increase in sustainable travel initiatives and a faster roll-out of electric vehicles compared to the business-as-usual scenario. Our mid-point estimate was an average of these two scenarios.</p> <p>This transport modelling used set out six location categories within which the emissions of each home would be expected to be similar: urban; edge of city greenbelt; edge of city non-greenbelt; new settlement; village; and public transport corridor. The North East Cambridge site was categorised as 'urban', given that it is located close to the City of Cambridge and on a mainline railway station. It is a unique location and the counterfactual development would be located further away from the City of Cambridge and not benefit from the same urban location or link to a mainline railway station. However, given the scale of the proposed housing development, whether it is an outward extension of</p>

Reference	Topic	Applicant's Response
	<p>economic profile that is far more likely to change over time than the City wide average. It is likely, in reality, that average household sizes at the suburban location will be higher, but this point is ignored. NECAAP is one of only two locations in the City adjacent to a mainline railway station. Because of the location and type of housing, a considerable proportion of residents will choose to live there to allow easy commuting to London or elsewhere, which is also ignored in the analysis.</p>	<p>a current development, such as Northstowe or Cambourne, or a standalone new settlement, it is likely that implementing comprehensive public transport links would be a priority. The counterfactual was hence categorised as 'public transport corridor', the second lowest location category in terms of transport emissions per home.</p> <p>Our modelling therefore accounts for differing travel patterns in different residential neighbourhoods – specifically that being located further away from the City of Cambridge will increase transport emissions given that car usage will increase and public transport usage, walking and cycling will fall.</p> <p>Taking account of variables such as age, and social and economic profile, and commuting patterns to London, is beyond the scope of this assessment. The key variable that Anglian Water are able to influence here is where the housing is delivered in Greater Cambridge, whether that is at the North East Cambridge site or in a generic suburban location where 8,350 homes could feasibly be delivered.</p> <p>If there were differences between the proposed and counterfactual developments in terms of their socio-economic and demographic attributes, then this would mean that emissions have been displaced from another development. For example, if the counterfactual development housed a higher proportion of retirees than the proposed development, then it might be reasonable to expect that the operational carbon emissions associated with housing would be higher (due to higher heating-related emissions). However, this does not mean that the counterfactual development is generating more emissions in and of itself as it is not creating extra retirees, it is just shifting the emissions from another development.</p> <p>As such, to isolate the impact that changing this location has on housing and commuting emissions and compare the developments on a like-for-like basis, these variables are assumed to be the same across the two modelling scenarios.</p>
	<p>v) The counter factual suburban location is described as being a generic suburban settlement and as a 'reasonable median comparator', whatever that means. In practice, this is in essence a free standing small settlement, such as Cambourne or Northstowe. No attempt has been made to compare a more realistic alternative urban edge</p>	<p>In terms of a settlement that could represent a reasonable median comparator for the purposes of this assessment, it is unreasonable to compare the proposed development site both with a dispersed village settlement, or with an identical site in terms of housing density and location, given that it is these characteristics that make the proposed site unique.</p> <p>Hence, a generic suburban settlement that has characteristics broadly in line with the sites on which 8,350 new homes could feasibly be delivered in Greater Cambridge, was chosen as a reasonable median comparator. This could either be an extension of a current development, such as Northstowe or Cambourne, or a standalone new settlement.</p> <p>The transport modelling that we used set out six location categories within which the emissions of each home would be expected to be similar: urban; edge of city greenbelt; edge of city non-greenbelt; new settlement; village; and public transport corridor. The North East Cambridge site was categorised as 'urban', given that it is on Cambridge's last major brownfield site, located close to the City of Cambridge and is near to a mainline railway station. It is a unique location and the counterfactual development would not benefit from the same urban location or link to a mainline railway station. However, given the scale of the proposed housing development, whether it is an outward extension of a current development or a standalone new settlement, it is likely that implementing comprehensive public transport</p>

Reference	Topic	Applicant's Response
	<p>location, such as at Cambridge Airport. This is likely to magnify differences in vehicle ownership, trip lengths and frequencies and the transport emissions between the so-called comparators. Commuting emissions, in particular, will decrease over time as both the electricity network and manufacturing are decarbonised. This is only partly taken into account in the analysis.</p>	<p>links would be a priority. The counterfactual is hence categorised as a 'public transport corridor' in the spatial options tool, the second lowest category in terms of transport emissions per home.</p> <p>The new Cambridge East/Cambridge Airport development is already identified in the spatial strategy and its capacity to meet part of Greater Cambridge's housing needs is defined. It does not, therefore, offer an alternative to the homes to be delivered at the proposed North East Cambridge site. An outward extension, i.e. beyond the development area currently envisaged into the greenbelt, may be feasible, but this would likely be categorised as an 'edge of city greenbelt' location and bring with it higher transport emissions per home than a 'public transport corridor' location.</p> <p>The operational carbon transport modelling accounts for an increase in electric vehicles as a share of the car market, the roll-out of other sustainable travel initiatives, and the decarbonisation of the electricity grid over time.</p> <p>The embodied carbon transport modelling accounts for an increase in electric vehicles as a share of the new car market. Due to a lack of reliable data, the decarbonisation of manufacturing was not considered. However, if this was taken into account, then the embodied emissions of both the proposed development and counterfactual would fall and the same proportional difference between the modelling scenarios would be found. This would therefore have no bearing upon the overall conclusion of this study.</p>
	<p>Findings 9.5.9 This analysis summarises that in Chapter 10 of the ES. The only additional information provided, presumably by the Applicant, is the assessment of the carbon footprint of retaining and improving the works on site. This is reported as embodied construction emissions of 11,000 tCO₂e as against a reported 58,000 tCO₂e for relocation. It is not stated whether the latter figure is intended to include</p>	<p>Emissions from the demolition of the existing WWTP are not included in the Environmental Impact Assessment (EIA). It is not part of the scope of this proposal and that work will be done by the future developer and considered as part of a separate planning application. It is likely to include the effects of emissions from plant used in demolition, taking into account the re-use of materials including secondary aggregate, recovered steel and other equipment. Chapter 2 Project Description paragraph 1.4.7 states that consent is not sought under the Development Consent Order for the subsequent demolition or redevelopment of the Cowley Road site. However, the Applicant has undertaken an assessment of the indicative scale of demolition emissions based on structure volumes and site area to be cleared on the existing site to demonstrate the likely scale of these emissions. These are outlined below and will be provided by Deadline 3 as part of an updated 7.5.2 Planning Statement Strategic Carbon Assessment [APP-206].[MOU1] [PD2] Anglian Water's estimate of the emissions associated with demolition, material processing, transport away from site, and ground remediation is 3,865 tCO₂e. If this is added to the mid-point estimate of embodied and operational emissions for the WWTP (71,000 tCO₂e), these emissions represent ~5% of total WWTP emissions. They represent ~0.3% of total emissions for the proposed development under the mid-point scenario (1,400,000 tCO₂e). Several conservative assumptions have been made with this estimate, including locating the disposal site 50km away from the demolition site (there are many things that could be done to reuse aggregate on site or locally) and that the plant and transport is exclusively diesel powered.</p>

Reference	Topic	Applicant's Response
	<p>for the demolition and remediation of the existing works, but it can be assumed that it does not.</p>	<p>The report commissioned by Save Honey Hill Group also estimates the emissions associated with decommissioning of the site, demolition of structures, material processing and ground remediation. It arrives at a slightly lower but similar estimate of 2,800 tCO₂e. If this added to the mid-point estimate of embodied and operational emissions for the WWTP (71,000 tCO₂e), these emissions represent ~4% of total WWTP emissions. They represent ~0.2% of total emissions for the proposed development under the mid-point scenario (1,400,000 tCO₂e).</p> <p>Although these emissions are not negligible, they are not significant enough to change the key finding of this comparative assessment. A note has been added to the Strategic Carbon Assessment report detailing these demolition emissions.</p>
	<p>9.5.10 The overall buildings emissions are reported as 0.5 mTCO₂e for the residential counterfactual embodied emissions and 0.7 mtCO₂e for relocation, with the non-residential emissions equal under both. The 0.2 mtCO₂e difference is almost all a result of the greater floorspace being assumed at the suburban location. The analysis appears to assume the same number of residents in both locations, although, in reality, household sizes are likely to be higher in the suburban location, with a higher proportion of larger dwellings in the mix. All this analysis shows is that if you build larger houses, these will</p>	<p>In order to isolate the impact of the location of the housing development, we have modelled that the number of residents will be the same in both locations. The GIA per resident will be lower in an urban location like North East Cambridge compared to a suburban location where the residential units will likely be delivered via houses and low-rise apartment blocks, as opposed to higher density mid-rise apartment blocks at the North East Cambridge site. Our modelling demonstrates that, due to this increased GIA, embodied emissions from delivering housing at the counterfactual site will be significantly higher.</p>

Reference	Topic	Applicant's Response
have greater embodied carbon emissions.		
9.5.11 In SHH's view, this analysis should only have considered a development of 5,600 dwellings or fewer on the Applicant's land, which would reduce the embodied and overall carbon emissions, including non-residential, to around 0.4 to 0.5 mtCO₂e at both locations.		<p>The relocation project will enable the delivery of 8,350 new homes and this was modelled for the proposed development. Therefore, in order to undertake this comparative assessment, we also modelled the delivery of 8,350 homes for the counterfactual scenario. If 5,600 homes were modelled, the same proportional difference between the proposed development and counterfactual would be found.</p>
9.5.12 As reported, the analysis on p16 suggests that embodied transport emissions will be 31% greater at the suburban location, 0.3 mtCO₂e as against 0.2 mtCO₂e at NECAAP. The operational emissions are reported as 0.7 mtCO₂e as against 0.4 mtCo₂e. Again, a proper comparison, based on the core site would reduce all those values to less than 67% of the reported figures. Given the limitations in the assumptions and absence of trip length data, it is difficult to judge by how much this exaggerates the real long-		<p>If the number of homes assessed was 5,600 (instead of 8,350), then transport emissions for both the proposed development and counterfactual would fall and the same proportional difference would be found between the proposed development and counterfactual in terms of emissions produced.</p> <p>The transport modelling that we used set out six location categories within which the emissions of each home would be expected to be similar: urban; edge of city greenbelt; edge of city non-greenbelt; new settlement; village; and public transport corridor. The North East Cambridge site was categorised as 'urban', given that it is on Cambridge's last major brownfield site, located close to the City of Cambridge and is near to a mainline railway station. It is a unique location and the counterfactual development would not benefit from the same urban location or mainline railway station connection. However, given the scale of the proposed housing development, whether it is an outward extension of a current development, such as Northstowe or Cambourne, or a standalone new settlement, it is likely that implementing comprehensive public transport links would be a priority. The counterfactual is hence categorised as a 'public transport corridor' in the spatial options tool, the second lowest category in terms of transport emissions per home.</p> <p>The new Cambridge East/Cambridge Airport development is already identified in the spatial strategy and its capacity to meet part of Greater Cambridge's housing needs is defined. It does not, therefore, offer an alternative to the homes to be delivered at the proposed North East Cambridge site. An outward extension, i.e. beyond the development area currently envisaged into the greenbelt, may be feasible, but this would likely be categorised as an 'edge of city greenbelt' location and bring with it higher transport emissions per home than a 'public transport corridor' location. There is therefore not an exaggeration of the difference in transport emissions between the two locations.</p>

Reference	Topic	Applicant's Response
	<p>term differences in per person carbon footprints there will be between the two locations. It is certainly likely that a properly calculated comparison between say NECAAP and another edge of city location eg the Airport, would show far smaller difference in overall carbon emissions. In any event, those differences are likely to be smaller than the 'errors of estimate' in this assessment.</p>	
	<p>Conclusions The Applicant's so called Strategic Whole Life Carbon Assessment in AW 7.5.2 cannot be given any credence. The assessment for Aspect 1 only reports the assessment included in Chapter 10 of the ES, but does confirm that relocation will give rise to avoidable construction emissions that are at least 40,000 tCO₂e (excluding demolition) higher for relocation over retention. The analysis under Aspect 2</p>	<p>This strategic study's principle purpose is to provide supplementary information related to carbon for the EIA as part of the DCO process. It is a high-level comparative assessment that broadly adheres to overarching RICS carbon assessment principles and incorporates a range of scenarios to account as best as possible for the available data. While a level of uncertainty should be attributed to the results, the magnitude of the difference between the modelling scenarios is such that we can have confidence in the overall findings, i.e. that the counterfactual (alternative) scenario will generate significantly more emissions than Anglian Water's proposed relocation project. This key conclusion holds even if there is some variation in the absolute amount of emissions that are realised.</p> <p>The key finding of this comparative assessment is fundamentally driven by the fact that a suburban development will produce more emissions than an urban development for two reasons: Firstly, the residential units will have a larger floor area, which significantly increases embodied carbon emissions. Secondly, as it is located further away from the City of Cambridge, it will increase transport-related emissions due to the increased travel demand associated with transport into the centre.</p>

Reference	Topic	Applicant's Response
	<p>shows no valid difference between the two locations. The analysis under Aspect 3 is flawed, for the reasons stated, and has not demonstrated that there will be a substantial or indeed relevant difference between transport emissions for a development on the core site at NECAAP when compared, for example, to another realistic edge of city location. The assessment provides no support for the assertions of the City Council and South Cambridgeshire District Council that 'NECAAP is the most sustainable strategic location for housing development' in the Greater Cambridge area, which are themselves based on a very simplistic sustainability appraisal. The assessment in APP-206 does not support the Applicant's assertion that, overall, relocation of the WWTP will give rise to lower carbon emissions, even when the potential redevelopment of the core site is taken into</p>	

Reference	Topic	Applicant's Response
	account, and that assertion should be given no weight in the determination of the DCO application.	

Table 2-12: Forestry Commission

Reference	Topic	Applicant's Response
N/A	Veteran trees	<p>The Applicant provided a response in respect to veteran trees as part of ExQ1 5.51 (App Doc Ref 8.3) [REP1-079], which states:</p> <p><i>“There are two veteran trees within the Order Limits (Figure 8.3 in ES Book of Figures Biodiversity (App Doc Ref 5.3.8) [AS-050]). This figure references that these will be impacted, however, as discussed with the Technical Working Group in a meeting on 5th September 2023, these will not be impacted by the Proposed Development. This is because the pipeline trench avoids the trees. The Applicant will update Figure 8.3 in ES Book of Figures Biodiversity (App Doc Ref 5.3.8) [AS-050] to reflect this detail. The NPSWW Accordance Table (App Doc Ref 7.5.1) [AS-130] has been updated in respect of paragraph 4.5.13 to note this and is being provided at Deadline 1.”</i></p> <p>Furthermore, section 8 of ES Appendix 8.19 Waterbeach Pipeline Arboricultural Impact Assessment (App Doc Ref 5.4.8.19) [APP-104] provides recommendations for tree protection. This document highlights that one of the trees (T105) was surveyed as part of the tree surveys, but the other was not included due to it being outside of the area for tree survey. T105 is documented to have a root protection area radius of 12.6m and that this will be protected by Heras fencing to prevent damage. In the Applicant's response to ExQ1 14.11 (App Doc Ref 8.3) [REP1-079], the Applicant reconfirms that T105 will not be impacted.</p>
N/A	Tree planting	<p>The Applicant provides within the Landscape, Ecological and Recreational Management Plan (LERMP) (App Doc Ref 5.4.8.14) [AS-066] the approach to planting, landscape maintenance and watering. By specifying a wide variety of species, planting them early in the winter, maintaining and watering them, the chances of the planting becoming established and remaining healthy are increased. Tree and hedgerow species will be selected to withstand the increasingly dry conditions in East Anglia. Measures set out in ES Appendix 6.3 Outline Soil Management Plan (App Doc Ref 5.4.6.3) [REP1-034] will be taken to preserve the quality of topsoil stripped from the site for reuse which will further aid the establishment and good health of the planting. The LERMP states that stock types will be native species.</p>

Table 2-13: Woodland Trust

Reference	Topic	Applicant's Response
	Veteran trees	<p>The Applicant provided a response in respect to veteran trees as part of ExQ1 5.51 (App Doc Ref 8.3) [REP1-079], which states:</p> <p><i>“There are two veteran trees within the Order Limits (Figure 8.3 in ES Book of Figures Biodiversity (App Doc Ref 5.3.8) [AS-050]). This figure references that these will be impacted, however, as discussed with the Technical Working Group in a meeting on 5th September 2023, these will not be impacted by the Proposed Development. This is because the pipeline trench avoids the trees. The Applicant will update Figure 8.3 in ES Book of Figures Biodiversity (App Doc Ref 5.3.8) [AS-050] to reflect this detail. The NPSWW Accordance Table (App Doc Ref 7.5.1) [AS-130] has been updated in respect of paragraph 4.5.13 to note this and is being provided at Deadline 1.”</i></p> <p>Furthermore, section 8 of ES Appendix 8.19 Waterbeach Pipeline Arboricultural Impact Assessment (App Doc Ref 5.4.8.19) [APP-104] provides recommendations for tree protection. This document highlights that one of the trees (T105) was surveyed as part of the tree surveys, but the other was not included due to it being outside of the area for tree survey. T105 is documented to have a root protection area radius of 12.6m and that this will be protected by Heras fencing to prevent damage. In the Applicant's response to ExQ1 14.11 (App Doc Ref 8.3) [REP1-079], the Applicant reconfirms that T105 will not be impacted.</p>

Table 2-14: Quy Fen Trust

Reference	Topic	Applicant's Response
	Need for development	The need for the Proposed Development is set out in detail in the Planning Statement (App Doc Ref 7.5 - REP1-049) and the Applicant refers to its additional comments on this matter in response to SHH's RRs at 4.1.- 4.4 of REP1-078 . Release of the existing WWTP site will enable regeneration and the creation of a highly sustainable new city district delivering 8,350 homes (40% affordable), 15,000 new jobs and a wide range of community, cultural and open space facilities (including a community garden and food growing spaces, indoor and outdoor sports facilities) on a brownfield site within the urban area of Cambridge which is recognised as "the most sustainable location for strategic scale development available within Greater Cambridge".
	Site selection	The Applicant does not agree with the characterisation of the site selection process (paragraph 2.5), which, as described in Chapter 3 of the Environmental Statement (AS-018), was comprehensive and balanced a wide range of relevant criteria, including those environmental criteria identified in the NPSWW.
	Carbon	The Applicant refers to its response to ExQ1 6.12.
	Pollution	<p>The Applicant has engaged with the Environment Agency throughout the project and has shared the Hydrological Impact Assessment report (App Doc Ref 5.4.20.9) [APP-159] together with the contaminant transport modelling Report [APP-158] referenced within the ES Chapter 20 Water Resources (App Doc Ref 5.2.20) [AS-040], which considers potential pollution pathways to vulnerable receptors including Black Ditch and Stow-cum-Quy Fen SSSI.</p> <p>Furthermore, in response to EXQ1 21.18 (App Doc Ref 8.3) [REP1-079], the Applicant has further provided information on design, construction and operational measures employed by the Applicant to avoid potential leakage from the proposed infrastructure, repeated below:</p> <p><i>"Design:</i></p> <ul style="list-style-type: none"> <i>As part of the detailed design careful consideration will be given to the selection of material and design specification to ensure that the proposed infrastructure will be appropriate for the operating pressure regime, the characteristics of the fluid to be transmitted, as well as the existing soil, backfill conditions and proposed installation technique. Design risk assessments will be carried out to identify where secondary containment measures are required to comply with environmental permitting requirements.</i> <i>The design of the sludge treatment centre will follow the conditions for industrial emissions (including to water and soil) as set out in the environmental permit issued for the sludge treatment plant under the Industrial Emissions Directive (IED) as stated in Appendix A of the Consents and Other Permits Register (Doc 7.1) [AS-123].</i>

Reference	Topic	Applicant's Response
		<ul style="list-style-type: none"> <i>A separate (and self-contained) drainage system will be constructed to collect potentially contaminated runoff (including spillages and/or leakage) from the impermeable areas of the proposed STC and return it to the inlet works for treatment as explained in paragraph 3.2.2 of the Drainage Strategy (Doc 5.4.20.12) [APP-162]. In addition, surface water runoff (including spillages or leakage) from areas of the proposed WWTP that may be contaminated will also be collected in closed drainage systems and returned to the inlet works for treatment as explained in paragraph 3.2.5 of the Drainage Strategy (Doc 5.4.20.12) [APP-162].</i> <p><i>Construction:</i></p> <ul style="list-style-type: none"> <i>During construction of the infrastructure appropriate tests will be carried out to confirm the integrity of the completed infrastructure and ensure it has been constructed in compliance with the specified requirements. The construction process, and associated integrity tests for water containing infrastructure, includes the requirement to comply with codes of practice and specifications such as the 'Civil Engineering Specification for the Water Industry' (CESWI, currently the 7th Edition) published by the WRc (Water Research Centre).</i> <p><i>Operation:</i></p> <ul style="list-style-type: none"> <i>Regular inspections and maintenance of the infrastructure will be carried out in accordance with the Operation and Maintenance Manual.</i> <p><i>In addition, monitoring of pressurised pipelines will be carried out to help detect potential leakage issues early, ensuring prompt repairs and minimizing environmental impact."</i></p>
	Landscape	The Applicant understands that this comment is directed towards the ExA.
	Impacts on Quy Fen	The Applicant refers to the response to similar comments raised in Natural England's Relevant Representation [RR-015] in the Applicant's Responses to the Relevant Representations (App Doc Ref 8.2) [REP1-078].

Table 2-15: National Trust

Reference	Topic	Applicant's Response
	Landscape and ecology	The Applicant has responded in full to points raised in RR-013 in relation to the extent of the LERMP within the Responses to the Relevant Representations (App Doc Ref 8.2) [REP1-078]. In relation to the point raised in relation to the Commitment Register, the Applicant refers to paragraph 4.1.2 and 4.1.4 within section 4 of the LERMP (App Doc Ref 5.4.8.14) [AS-066], which confirms the intention to set up an Advisory Group.
	Hydrology and Hydrogeology	The Applicant has responded in full to points raised in RR-013 within the Responses to the Relevant Representations (App Doc Ref 8.2) [REP1-078]. The Applicant submitted a draft Outline Water Quality Monitoring Plan at Deadline 1 (App Doc Ref 5.4.20.3) [REP1-046]. This has been reviewed and accepted by the Environment Agency and will be submitted as a final version at Deadline 2.
	Access and Recreation	In relation to matters raised regarding the bridleway the Applicant has addressed this in the response to ExQ1 7.24 part c). In relation to matters raised in relation to recreational users and Stow-cum-Quy SSSI, the Applicant has responded in full to points raised in RR-013 within the Responses to the Relevant Representations (App Doc Ref 8.2) [REP1-078].

Table 2-16: Waterbeach Development Company (represented by Boyer)

Reference	Topic	Applicant's Response
Introduction		The Applicant acknowledges the stakeholder's response to the Rule 8 Letter dated 24 October 2023.
Background	Consultation	The Applicant agrees with the details stated in relation to the discussions regarding the change to the Order Limits in the vicinity of the proposed new Waterbeach railway station (see Sheet 10 of the Land Plans (App Doc Ref 4.4) [REP1-016]) and confirms that dialogue will continue during the Examination.

Reference	Topic	Applicant's Response
Comments on proposed reduction in Scheme Order Limits at Waterbeach		<p>The Applicant notes the stakeholder's support of the change to the Order Limits in the area around the proposed new railway station at Waterbeach. The Applicant believes there is a typographical error in the first bullet point in this section of the stakeholder's comments, such that "2013" should be "2023".</p> <p>The Applicant notes the stakeholder's comments regarding "practical considerations" relating to the construction methodology for the proposed new station and agrees that these will be discussed with the stakeholder during the Examination period. Those discussions will include the stakeholder's requirements in relation to access to its access from the A10 to the area of the proposed new Waterbeach railway station.</p> <p>In addition, the Applicant will discuss the suggestion of a separate statement of common ground with stakeholder.</p>

Table 2-17: Marshall Group Properties

Reference	Topic	Applicant's Response
4	Overall Capacity of the plant	This has been answered in paragraph 2.2.14 of the Applicant's Planning Statement (App Doc Ref 7.5 - REP1-049) and in its response to ExQ1 21.20 (App Doc Ref 8.3) [REP1-079]. It has also been addressed at 4.3 in the Applicant's Response to the Relevant Representations document (App Doc Ref 8.2) [REP1-078]. The Applicant has worked with the City Council and South Cambridgeshire District Council to ensure the proposed development allows for forecast growth proposed within the drainage catchment area in the adopted and emerging Local Plans some of which (including the strategic sites which include Cambridge East) is expected to be delivered post 2041.
5	Water Management	This issue has been addressed at 4.3 in the Applicant's Response to the Relevant Representations document (App Doc Ref 8.2) [REP1-078]. The Applicant is engaging with the stakeholder on this point, however, the future options for black water and other opportunities are outside the scope of the Application and the design of the Proposed Development.
6	Transport	<p><i>The queries regarding the site access capacity testing remain unanswered – it is unclear how sensitive this junction performance is to changes in forecast flows or additional traffic. The Examining Authority request this is addressed in their questions.</i></p> <p>The Applicant has tested the site access junction for its own reasonable worst case scenario, paragraph 9.5.23 of the Transport Assessment. The assessment shows that junction is sensitive to peak hour flow changes. The Applicant has proposed the measures set out in the CTMP to mitigate this possible impact. The primary measure is to manage</p>

Reference	Topic	Applicant's Response
		<p>construction traffic arrivals/departures to outside the peak hours. Additionally, there is a stakeholder liaison and construction forum measure that is committed to that will provide the mechanism to agree and manage construction routes and delivery by the project in discussion with local developers and the highway authority to ensure impacts of changes to forecast flows can be dealt with.</p> <p><i>The queries regarding the sensitivity of A14 J33 roundabout to flow changes is also not addressed and the Examining Authority request this is addressed in their questions.</i></p> <p>Answered by above response.</p> <p><i>The "Outline Operational Logistics Traffic Plan" does not include any engagement with local stakeholders such as major developers.</i></p> <p>The outline plan is to be agreed with the Cambridge County Council as the highway authority when it is formalised as the detail traffic plan. As part of that plan a monitoring regime will be agreed that will ensure community concerns regarding vehicle movements are minimised. If additional engagement with developers or other stakeholders is required with the forming of that detail plan it will be agreed at that point.</p> <p><i>No construction traffic management plans, construction routing plans or emergency access plans have been provided. The Examining Authority request this is addressed in their questions.</i></p> <p>Construction routing plans are provided in ES Appendix 19.3: Transport Assessment Appendix A – Figures, Figure A-2. The Construction Traffic Management Plan is provided in ES Appendix 19.7: Construction Traffic Management Plan. Emergency access plans are to be agreed with the emergency services and is being agreed through the Draft Statement of Common Ground (App Doc Ref 7.14.5).</p> <p><i>The TEMPro rates used in the Transport Assessment work appear to include housing growth at Land North of Cherry Hinton and Marleigh, but there is no allowance for further growth at Cambridge East. This contradicts with statements later which mention junction modelling does not take account of Marleigh or Land North of Cherry Hinton as they are not assumed to be constructed or operational during the construction of the treatment works. The Examining Authority has requested resolution of this in Q20.77.</i></p>

Reference	Topic	Applicant's Response
		<p><i>As housing and job growth at Cambridge East is not within an Adopted Local Plan or a live planning application, Cambridge East would not usually be expected to form part of the core assessment, however a sensitivity test could be undertaken to understand how this affects the site access junction, particularly given that the relocation of the waste-water treatment facility is to facilitate the wider growth of Cambridge in the long term.</i></p> <p><i>Site access arrangements already appear to be close to capacity up to 2038 – concern as to whether sufficient flexibility has been built into the site access proposals and operational access strategy to facilitate longer term growth beyond the Phase 1 operational phase, or in a situation where the volume or origins of vehicles entering and exiting the site differs from that tested within the Transport Assessment (has the access been tested to 2050 and beyond?)</i></p> <p>TEMPRO was agreed with Cambridge County Council as the best way of determining potential traffic growth for the area. The Applicant has noted in the assessment that the junctions are sensitive at peak times and the proposed CTMP and OTLP are documents that enable mitigation measures to minimise the impact of the project on the local road network to be put in place.</p> <p><i>Any additional info provided on the emergency access routing for the Proposed Development (should be agreed with Marshall in the event of issues on the A14 and options may directly impact Marshall sites in the east of Cambridge).</i></p> <p><i>Emergency access plans are to be agreed with the emergency services and is being agreed through the Draft Statements of Common Ground (App Doc Ref 7.14.5). Also, as previously noted, the proposed CTMP and OTLP a have provisions to engage with Marshalls as a local developer.</i></p> <p><i>Proposed site access and A14 J33 – Query on methodology that supports current conclusions for the capacity assessment at these junctions:</i></p> <ul style="list-style-type: none"> • <i>Why the traffic data for the strategic road network junctions collected in December 2021 hasn't been re-validated with data from 2022 and whether there are implications for the capacity conclusions?</i> • <i>Whether the future forecast year flows through these junctions include robust forecasts of consented flows from Land North of Cherry Hinton and Marleigh as Appendix K of the TA is missing which sets out the growth assumptions?</i> • <i>What assumptions were included for Cambridge East within the junction modelling?</i>

Reference	Topic	Applicant's Response
		<ul style="list-style-type: none"> How sensitive the conclusions regarding the performance of A14 J33 are in the event that the volume, timing or assignment of operational traffic varies from those within the Transport Assessment? <p>The Applicant has validated the 2021 data by the use of ATC surveys in March 2022, this is contained in the Transport Assessment in Section 5.1. The growth assumptions are included in the Transport Assessment, Appendix K, TEMPRO growth note. The sensitivity of the junctions J34 and J33 are noted in the Transport Assessment junction modelling and the mitigation measures, set out in previous answer, is the proposed mechanism to manage the potential variations in traffic patterns, should they be different to the reasonable worst case scenario that has been assessed.</p> <p><i>Additional questions raised in The Examining Authority's written questions and requests for information (ExQ1).</i></p> <p>The Applicant would refer Marshalls to the EXQ1 response document for responses to those.</p>
8	Odour	<p>Outside of the review and the approvals included in the DCO process, the Odour on site at the Proposed CWWTP would fall under the jurisdiction of the South Cambridgeshire District Council. They would use e.g. Policy SC/14 of the SCDC Local Plan and the oversight of the EHO (Environment and Health Officers) to manage any complaints and the response thereto, if and as they arise.</p> <p>Please refer to APP-160, the Storm model report (WW010003-000692-5.4.20.10 ES Volume 4 Chapter 20 Appendix 20.10 Storm model report.pdf), for a full description of the storm management approach and associated storm analysis. Table 6 therein reports the amount of times the storm pumps (and by inference the receiving storm tank(s)) would be used, based on the EA's approved 10 year timeseries modelling, namely 29 times in 10 years.</p> <p>Please refer to APP-034, the Project Description (5.2.2 Environmental Statement - Volume 2 - Chapter 2 - Project Description), section 2.3 for a description of the use of the storm tanks. In summary, when the off-line storm storage tanks were used, and the storm has passed and flow rates have reduced below the FFT (flow to full treatment), the water stored will be diverted back to the TPS (terminal pumping station) where it is combined with the other flows to treatment. The storm storage tanks are capable of being fully drained and a suitable means of cleaning provided to avoid build-up of solids, odour, and blockages, to meet the conditions of the permit.</p> <p>8.5 The ExA has also asked questions on the suitability of the emission rates. While the risk is low due to the distance between the proposed WWTP and land holdings of Marshalls, clarification is sought as what the impacts might be if the</p>

Reference	Topic	Applicant's Response
		works are not operating under a 'best case scenario', which is what appears to be have been modelled (the emission rates used are well below published emission rates (in this case from within the UK Water Industry Research (UKWIR) documentation)

Table 2-18: Cambridge Friends of The Earth

Reference	Topic	Applicant's Response
Question 1	Water supply	<p>South Cambridgeshire District Council and Cambridge City Council have both confirmed in their Local Impact Reports that, due to the water scarcity, it may be appropriate to make some modest amendments to the trajectory in the NECAAP and GCLP once the water supply position is clear. However, the timing Cambridge Water identifies in its updated draft Water Resource Management Plan (September 2023) for additional water supply through a bulk water transfer is 2032, which broadly fits with the trajectory in the emerging plans for NEC, and also the removal of the odour constraint if the DCO is approved. Also, the trajectory is not a ceiling on delivery rates and if circumstances allow, build out rates could be higher.</p> <p>It is understood that the Environment Agency (EA) has a statutory period of 10 weeks to respond to Cambridge Water's revised Water Resource Management Plan that was published in September 2023 and is understood to expire in November. This response is to DEFRA and it is not clear whether it will be made public. DEFRA will make the decision on whether the revised WRMP is approved, and it is hoped it will become clearer before the end of 2023. In any event it is expected that the final WRMP will be published before the conclusion of the DCO examination, and an update can be provided to the ExA when information is available. Whilst this has implications for the timetable for next steps for the GCLP, given the anticipated date for clarity on water supply, it is not expected to have any implications for progressing the NECAAP, which can only take place on conclusion of the DCO process, subject to the DCO being approved.</p> <p>The assumptions underpinning the trajectory in the GCLP First Proposals will be kept under review as the plan progresses, but it remains the Councils' view that a substantial amount of housing can be delivered on the NEC site to contribute to strategic housing needs to 2041 and beyond, if the DCO for the relocation of the CWWTP is approved (see LIRs of both Councils at paragraph 6.89).</p>

Reference	Topic	Applicant's Response
Question 2	New WWTP	The DCO Requirement 21 sets an obligation to agree an Operational Carbon Management Plan showing how the net zero operational emissions commitment will be achieved. The Applicant has not committed to offsetting construction or decommissioning emissions. The Outline Operational Carbon Management Plan highlights that the Applicant will report emissions from the proposed WWTP, on an annual basis to confirm scale of offsets secured continue to allow the scheme to be operationally carbon neutral. Figure 4.5 in the ES Chapter 10: Carbon (App Doc Ref 5.2.10) [APP-042] shows the cumulative net emissions over the lifetime, this shows that after 15 years of development (preferred option) lifetime, the impact of the construction emissions is estimated to have been negated by the net benefit of the natural gas exports.
Question 3	Affordable housing delivery	In the event that this DCO application is approved, it is expected that the existing site would be available for redevelopment by the middle of the plan period , enabling significant delivery of jobs and homes by 2041. Infrastructure and viability evidence supporting the NECAAP confirm that development at North East Cambridge is viable, robust and that a policy compliant provision of affordable housing (as well as necessary infrastructure) can be delivered, which would amount to 40% of the total housing number to be delivered in the NEC area. In respect of the vacated existing WWTP site, this would amount to 2,200 affordable homes.
Question 4	Who benefits from the development	It is unclear which development here is being referred to. The Proposed Development will serve the waste water recycling needs of all Greater Cambridge residents and occupiers within the drainage catchment area. Regeneration within NEC enabled by the vacation of the existing WWTP will help to meet pressing housing needs and as part of the realisation of the City and District Councils' long-held ambition to create a new City District which supports the continued economic growth of Cambridge .

Table 2-19: Gonville & Caius College, Cambridge (represented by Bidwells)

Reference	Topic	Applicant's Response
Rep 1	Scheme design	<p>The Applicant's notes the stakeholder's concerns but does not agree with the stakeholder's assertion about a lack of detailed rationale for elements of the design.</p> <p>The Applicant is working with the stakeholder to minimise the acquisition of land where possible. The heads of term that are currently being negotiated, on a without prejudice basis between the parties, seek to reduce the amount of freehold land to be acquired from the stakeholder.</p> <p>In respect of parcel 021b shown on the Land Plans, (App Doc Ref 4.4) [REP1-016] this is not just needed by the Applicant to deliver BNG, it is also needed for ecological mitigation (i.e. the relocation of water voles), the Final Effluent Outfall structure, the temporary diversion of a public right of way, and the Final Effluent and Storm Flow Pipelines (App Doc Ref 4.4) [REP1-016]. The final layout of the various works in this particular location is not fixed, and the Applicant necessarily requires flexibility to ensure that all of these works can be planned and delivered in a coordinated and efficient manner. Until the designs are finalised, the exact location of each component of the works cannot be fixed and, therefore, the amount of the land parcel to be used. The extent of parcel 021b cannot therefore be reduced at this present time without prejudicing the Applicant's ability to deliver one or more of Works Nos 31, 32 or 39 (see Works Plans (App Doc Ref 4.4) [REP1-016]).</p> <p>It can be seen from the list of land agreements noted by the stakeholder as being under discussion that the combination of land and rights required from the stakeholder is complex. At the moment, that list omits how the need for the construction compounds and temporary working areas will be dealt with.</p> <p>The Applicant is in detailed negotiations with the stakeholder and has presented a number of solutions which in combination would reduce the extent of final permanent land acquisition, but which can only be achieved by agreement, as opposed to unilaterally via compulsory acquisition powers under the DCO process.</p> <p>The Applicant disagrees that the plans have been inconsistent or unreliable. The DCO Works Plans (App Doc Ref 4.3) [APP-150]) and Land Plans (see Land Plans (App Doc Ref 4.4) [REP1-039]) are composite and show the multiple overlapping works and land rights affecting the stakeholder's landholding. At the stakeholder's request, the Applicant has provided individual plans showing each relevant land parcel and the works and land rights required for the Proposed Development within the stakeholder's land ownership. These are not inconsistent with the DCO</p>

Reference	Topic	Applicant's Response
		<p>Works and Land Plans (App Doc Ref 4.3) [APP-150]) and (App Doc Ref 4.4) [REP1-039] but have simply been presented in an alternative manner.</p> <p>The Applicant notes the stakeholder's position but would point out that it would be at the ExA's discretion as to whether to accept new points made after the submission of relevant and written representations which could and should have been made at an earlier stage of the examination.</p>
Rep 2	Scope of rights proposed for acquisition	<p>Whilst the Applicant acknowledges there will be a temporary impact on the farm operation during the construction period, the Applicant disagrees with the stakeholder's comments about the ground-level acquisition being ill designed and inappropriate. Once constructed, the stakeholder's tenant (or any farm operator) will be able to operate the farm in almost the same way. The only small differences required will be the avoidance of a small number of ground level structures associated with the Waterbeach Pipelines South (see Design Plans Waterbeach Pipeline Long sections – Change Request (App Doc Ref 4.14) [AS-156]).</p> <p>The Applicant refers the stakeholder to its comments in relation to Rep 2 above. For the avoidance of doubt, parcel 021b (see Land Plans (App Doc Ref 4.4) [REP1-039]) is not required in its entirety for BNG purposes.</p> <p>The Applicant notes that the stakeholder does not appear to object to the need to acquire subsoil and a restrictive covenant for the Waste Water Transfer Tunnel (see Design Plans - Sewage Tunnel and Longitudinal Sections (App Doc Ref 4.12) [APP-026]) itself, but is concerned with the proposed acquisition of freehold and extending from the Waste Water Transfer Tunnel (see Design Plans - Sewage Tunnel and Longitudinal Sections (App Doc Ref 4.12) [APP-026]) up to the surface of the land for the two shafts within the stakeholder's landholding and within the area of land that is subject to the contract farming business.</p> <p>As explained in Statement of Reasons (App Doc Ref 3.1) [REP1-009] the shaft structures are an integral part of and will be physically connected to the Waste Water Transfer Tunnel, which is a strategic waste water asset which will be permanent.</p> <p>For equivalent reasons as to why the Applicant is seeking the freehold ownership of the subsoil containing the Waste Water Transfer Tunnel (see Design Plans - Sewage Tunnel and Longitudinal Sections (App Doc Ref 4.12) [APP-026]), it is seeking the acquisition of these shaft areas to ensure they are not interfered with and to protect the structural integrity of the Waste Water Transfer Tunnel.</p>

Reference	Topic	Applicant's Response
		<p>The Applicant has made suggestions to the stakeholder as to a form of agreement which would reduce the impact of the presence of these structures at the surface, helping to ensure that farming activities can continue once the construction activities have finished. The mechanism proposed could not be achieved unilaterally through compulsory acquisition powers and would require mutual obligations in an agreement.</p> <p>Whilst the Applicant hopes agreement can be reached to allow this to happen, the stakeholder will, in the usual way, be able to bring a compensation claim for losses sustained.</p> <p>The Applicant seeks only the protections it needs to ensure the integrity of the pipelines are not impacted by any form of development or other intrusive activities at the surface in the future.</p> <p>The proposed Waterbeach Pipeline Restrictive Covenant in Schedule 10 to the Draft DCO (App Doc Ref 2.1) [REP1-003] seeks to restrict activities such as building over the pipelines, the withdrawal of ground support from it, and the planting of deep rooted trees.</p> <p>This is necessarily a permanent restrictive covenant to protect the permanent infrastructure, but it is not an absolute restriction on all activities over the pipelines because the Applicant's consent may be sought, such consent not to be unreasonably withheld or delayed.</p> <p>In the event that development in the future is restricted as the stakeholder implies, it will be able to make a claim for compensation for this loss in the usual way.</p> <p>The justification for the acquisition of the land and rights required is contained within the Statement of Reasons (App Doc Ref 3.1) [REP1-009]. In addition, the justification for the acquisition of land parcel 021b (see Land Plans (App Doc Ref 4.4) [REP1-039]). have been explained in the Applicant's response to REP 1 above and in the Applicant's responses to ExA's ExQ1 (App Doc Ref 8.3) [REP1-079].</p>
Rep 3	Biodiversity Net Gain	<p>The target of 20% is not self-imposed by the Applicant.</p> <p>Paragraph 1.6.5 of the ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163] provides details on the SCDC Doubling Nature Strategy 2021, which sets an aspirational goal of 20% BNG for developments within the district. BNG is also outlined in the Greater Cambridge Biodiversity Supplementary Planning Document 2022, this document does not set 20% BNG as a fixed target. However, it is noted although a</p>

Reference	Topic	Applicant's Response
		<p>mandatory requirement for 10% net gain in biodiversity value is within the Environment Act 2021, a value of 20% is likely to be encouraged as best practice in order to meet the Natural Cambridgeshire target of doubling the amount of land managed for nature. The Greater Cambridge Biodiversity Supplementary Planning Document 2022 also advises that should new Local Plan policies instruct a higher percentage of Biodiversity Net Gain than that nationally mandated, that the higher of the two amounts (of Biodiversity Net Gain) shall be the minimum requirement for development.</p> <p>Table 4-2 of ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163] also provides feedback from Technical Working Group (TWG) meeting on 11 March 2021 when the Greater Cambridge Partnership (GCP) requested that the project should target 20% rather than 10% BNG.</p> <p>Furthermore, as published in the June 2023 Cambridge City Council and South Cambridgeshire District Council Policy Review of the Adopted Local Plans for Greater Cambridge it states "At an Oxford-Cambridge Partnership level the authorities have agreed a set of Environmental Principles which include the aims of doubling the area of land managed primarily for nature, and also to deliver a minimum 20% biodiversity net gain on development sites. These ambitions, together with the relatively low level of designated sites and priority habitats in Greater Cambridge, highlight the need for development to bring further net gains beyond the 10% proposed nationally. This will be addressed in the emerging Greater Cambridge Local Plan."</p> <p>The Applicant has responded to this point in its response to ExQ1.8.36 (see 8.3 Response to ExA's ExQ1 [REP1-079]).</p> <p>The Applicant will continue working with the stakeholder to seek a private treaty agreement and welcomes the opportunity to consider the revisions to the draft heads of terms.</p> <p>The plans referred to were not new as they were based on Figure 1 of ES Volume 4 Chapter 8 Appendix 8.13 BNG Report – Change Request (App Doc Ref 5.4.8.13) [AS-063].</p> <p>The Applicant has responded to the first part of this point early in REP 2. In its response to REP 1 above, and in its response to ExQ1.8.36 (see 8.3 Response to ExA's ExQ1 [REP1-079]), it has set out the justification for the compulsory acquisition of land.</p>

Reference	Topic	Applicant's Response
		<p>The Applicant has no comment to make on this point as the stakeholder has had access to all relevant material as part of the DCO application, as have all other interested parties. The Applicant confirms it will continue to work with the stakeholder to resolve any remaining points requiring agreement.</p> <p>Appendix C of ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13) [AS-163] sets out the reasons why the BNG river units are best located in parcel 021b.</p> <p>In the event this is not possible, the Applicant might be able to deliver the BNG river units outside of the Order Limits. The Applicant has, however, a requirement to deliver the water vole mitigation habitat (as opposed to BNG) as close to the existing habitat, which therefore necessitates it being located in land parcel 021b (see paragraph 1.3.5 of Appendix C of ES Volume 4 Chapter 8 Appendix 8.13 BNG Report – Change Request (App Doc Ref 5.4.8.13) [AS-063]).</p> <p>The relevant BNG guidance (see section 4 of ES Volume 4 Chapter 8 Appendix 8.13 BNG Report (App Doc Ref 5.4.8.13) [AS-063] requires the Applicant to first consider on-site provision of BNG, hence the proposed co-location of the river units BNG with the water voles mitigation habitat.</p> <p>The Applicant's ecological expert has advised the best location of the delivery of BNG river units is within land parcel 021b (see Land Plans (App Doc Ref 4.4) [REP1-016]). The Applicant does not own any river bank within the Order Limits.</p> <p>The Applicant refers the stakeholder to the answers given above.</p>
Rep 4	General comments and further points to address	<p>The stakeholder does not particularly raise any concerns regarding the matters listed in its written representations.</p> <p>The Applicant will continue to work with the stakeholder to agree terms for the acquisition of the relevant land and rights needed to deliver the Proposed Development.</p>

Table 2-20: The Great Ouse Boating Association Limited

Reference	Topic	Applicant's Response
		<p>The Applicant acknowledges the comments and welcomes the continued engagement. The concern raised within the stakeholder's response has also been identified by the Cam Conservators and relates to the land acquisition category that has now been amended to minimise the potential scope for extinguishment of navigation rights on the river Cam. The Applicant seeks to reassure the Stakeholder that the requirement to extinguish rights of navigation will only extend to the area of the outfall structure itself. This will be located in parcel 019a (see Land Plans (App Doc Ref 4.4) [REP1-016]) which has been significantly reduced in the extent it covers the river Cam. The Applicant refers the stakeholder to its response to ExQ1.8.36 in Response to ExA's ExQ1 (App Doc Ref 8.3) [REP1-079].</p> <p>At Deadline 1, the Applicant has included the River Cam Restrictive Covenant as a Package of Rights in the Draft DCO (App Doc Ref 3.1) [REP1-003], which is explained in Table 6-2 in the Statement of Reasons (App Doc Ref 3.1) [REP1-009]. This will restrict the placement of structures within 5m from the edge of the Final Effluent Outfall Structure, but it will not permanently extinguish navigation rights within that area. If the stakeholder wishes to discuss this any further or requires any further clarification the Applicant is happy to discuss further.</p>

Table 2-21: Sky Telecommunication Systems Limited

Reference	Topic	Applicant's Response										
ExQ1.8.4	Entry in the BoR	The stakeholder (Sky Telecommunication Systems Limited) will be added as a party in to the Book of Reference in relation to parcels 001a, 001b, 003e and 005c. The Applicant is in discussion with the Stakeholder regarding the relationship of Sky Telecommunication Systems Limited and Sky UK Limited, A revised Book of Reference will be submitted to the ExA as part of the Applicant's submission at Deadline 3.										
ExQ1.8.18	Land parcel 003e	<p>The Applicant will not be preventing the stakeholder's ability to have 24 hour access to its point of presence (PoP) within this parcel. In the event of the Applicant requiring access to this land parcel, it will liaise with the stakeholder to ensure 24 hour access is maintained and its apparatus is not affected.</p> <p>The Applicant has produced the table below, setting out the land parcels concerned. It contains details of the land parcel number, the stakeholder's interest in that parcel, the proposed Works Package for that land parcel, the type of acquisition proposed for that land parcel, and comments made by the Applicant relating describing what will happen in that land parcel and the stakeholder interest/apparatus.</p> <table border="1"> <thead> <tr> <th>Land Plan Parcel</th> <th>STSL's interest</th> <th>Proposed Works Package</th> <th>Type of Acquisition</th> <th>Comment</th> </tr> </thead> <tbody> <tr> <td>001a</td> <td>Apparatus No land interest. Wayleave only.</td> <td>Existing Rising and Gravity Main Diversions (Works No 17) (see Works Plans (App Doc Ref 4.3)) [REP1-150]. Cowley Road is subject to street works pursuant to Article 10 and Schedule 3 of the Draft DCO (App Doc Ref 2.1) [REP1-003].</td> <td>Rising and Gravity Main Diversion Rights (see the Draft DCO (App Doc Ref 2.1)) [REP1-003].</td> <td>If the Applicant needs to relocate STSL's apparatus in this land parcel, the Applicant will be required to comply with the Protective Provisions in Part 8 of Schedule of the Draft DCO (App Doc Ref 2.1) [REP1-003] to protect the</td> </tr> </tbody> </table>	Land Plan Parcel	STSL's interest	Proposed Works Package	Type of Acquisition	Comment	001a	Apparatus No land interest. Wayleave only.	Existing Rising and Gravity Main Diversions (Works No 17) (see Works Plans (App Doc Ref 4.3)) [REP1-150]. Cowley Road is subject to street works pursuant to Article 10 and Schedule 3 of the Draft DCO (App Doc Ref 2.1) [REP1-003].	Rising and Gravity Main Diversion Rights (see the Draft DCO (App Doc Ref 2.1)) [REP1-003].	If the Applicant needs to relocate STSL's apparatus in this land parcel, the Applicant will be required to comply with the Protective Provisions in Part 8 of Schedule of the Draft DCO (App Doc Ref 2.1) [REP1-003] to protect the
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Reference	Topic	Applicant's Response				
						apparatus and wayleaves.
		001b	Apparatus No land interest. Wayleave only.	Cowley Road is subject to street works pursuant to Article 10 and Schedule 3 of the Draft DCO (App Doc Ref 2.1) [REP1-003] .	N/A Potential interference with private rights only pursuant to Article 32 of the Draft DCO (App Doc Ref 2.1) [REP1-003] .	If the Applicant needs to relocate STSL's apparatus in this land parcel, the Applicant will be required to comply with the Protective Provisions in Part 8 of Schedule of the Draft DCO (App Doc Ref 2.1) [REP1-003] to protect the apparatus and wayleaves.
		003e	Apparatus No land interest. Wayleave only.	Decommissioning Works (Work No 40) (see Works Plans (App Doc Ref 4.3)) [AS-150] .	Decommissioning Works Rights (see the Draft DCO (App Doc Ref 2.1) [REP1-003] .	The Applicant does not intend to remove or divert STSL's apparatus proposed. There may be a need to enter the land to undertake decommissioning activities. The Applicant will be required to comply with the Protective Provisions in Part 8 of Schedule of the Draft DCO (App Doc Ref 2.1)

Reference	Topic	Applicant's Response				
						[REP1-003] to protect the apparatus and wayleaves.
		005c	Apparatus No land interest. Wayleave only.	Existing Rising and Gravity Main Diversions (Works No 17) (see Works Plans (App Doc Ref 4.3)) [AS-150]. Decommissioning Works (Work No 40) (see Works Plans (App Doc Ref 4.3)) [AS-150]. This private access road leading to the existing Cambridge Waste Water Treatment Plant is subject to street works pursuant to Article 10 and Schedule 3 of the Draft DCO (App Doc Ref 2.1) [REP1-003].	N/A Potential interference with private rights only pursuant to Article 32 of the Draft DCO (App Doc Ref 2.1) [REP1-003].	If the Applicant needs to relocate STSL's apparatus in this land parcel, the Applicant will be required to comply with the Protective Provisions in Part 8 of Schedule of the Draft DCO (App Doc Ref 2.1) [REP1-003] to protect the apparatus and wayleaves.
ExQ1.8.20	Proposed amendments to the Protective Provisions with the Draft DCO.	<p>Save for correcting the typographical error referred to, the Applicant does not agree with the stakeholder's proposed amendments to the Draft DCO.</p> <p>The protective provisions in paragraph 3 of Part 8 of Schedule 15 to the Draft DCO make the exercise of powers under the Draft DCO, which would include street works and compulsory acquisition and temporary possession powers, subject to the Electronic Communications Code. In view of this, the Applicant does not think the</p>				

Reference	Topic	Applicant's Response
		stakeholder's proposed amendment to only refer to Article 44 of the Draft DCO is necessary, especially as that Article is for the benefit of all telecommunications operators.

Table 2-22: Nigel Seamarks

Reference	Topic	Applicant's Response
	Keep the WWTP at the existing site would result in homes built around the sites more affordable	<p>Housing pressures in Greater Cambridge and their impact on local housing affordability are well recognised and provide the rationale for this Proposed Development. The need for the Proposed Development is set out in detail in the Planning Statement (App Doc Ref 7.5 - REP1-049) and the Applicant refers to its additional comments on this matter in response to Save Honet Hill's RRs at 4.1.- 4.4 of REP1-078. Release of the existing WWTP site will enable regeneration and the creation of a highly sustainable new city district delivering 8,350 homes (40% affordable), 15,000 new jobs and a wide range of community, cultural and open space facilities (including a community garden and food growing spaces, indoor and outdoor sports facilities) on a brownfield site within the urban area of Cambridge which is recognised as <i>"the most sustainable location for strategic scale development available within Greater Cambridge"</i>.</p> <p>Given the long-held aspirations for the regeneration of this area since the late 1980's, there is no evidence that retention of the existing WWTP within NEC would result in the building of more affordable homes around it. Indeed, the Applicant, supported by the representations of the City and District Council (see, for example, South Cambridgeshire District Council's response to ExQ1-2.13 and 2.30-2.35, REP1-140)</p>

Table 2-23: Friends of the River Cam

Reference	Topic	Applicant's Response
	Beneficiaries and the Need for Housing	The Applicant notes the comments made regarding beneficiaries and the need for housing. The Applicant has covered this in its response to EXQ1 2.15 and EXQ1 2.19, (8.3 Response to ExA's ExQ1) [REP1-079] directed to the Applicant, Cambridgeshire County Council and South Cambridgeshire District Council. The delivery of housing and affordable housing are comments that are better directed to the Local Authorities.

	Green Belt	The Applicant notes the comments in relation to development in the Green Belt. The Applicant has assessed the impact of the Proposed Development on the Cambridge Green Belt in section 2 of the Green Belt Assessment (App Doc Ref 7.5.3) [APP-207]. The Applicant also refers to The Planning Statement (App Doc Ref 7.5) [AS-166] and the justification for the development in very special circumstances.
	Is there enough Water	The Applicant notes the comments on the demands to water supply in the region and water resources. The comments are better directed to Cambridge Water as the statutory water undertaker for the region. The comments regarding the delivery of future water resources for the region form part of the Anglian Water draft Water Resource Management Plan 2024 and are not part of the proposed development.
	A need for due diligence	The Applicant notes the comments. Housing Infrastructure Funding (HIF) funding has already deemed it appropriate to award funds for the Proposed Development. All applications to the HIF programme were subject to a comprehensive assessment process undertaken by MHCLG (now DLUHC) and Homes England. A summary of the HIF assessment process and the assessment of the Cambridge HIF bid submission is set out in HE Assessment of Cambridge HIF Bid Redacted (App Doc Ref 8.10) [REP-123].

Table 2-24: Mr John McGill

Reference	Topic	Applicant's Response
	Green Belt Land	The Applicant acknowledges the comments and objection to development within the Green Belt. The Applicant has set out in detail in the Planning Statement (App Doc Ref 7.5) [REP1-049] the justification for the development in the Green Belt. The Applicant has also in its response to ExAQ1 11.2 [REP1-079] set out how it has sought to minimise the amount of inappropriate development in the Green Belt. The relevant Green Belt policies and the determination of any further development within it is a matter for the Local Planning Authority.
	Traffic	The Applicant notes the comment regarding additional traffic. During construction all vehicle and pedestrian movements will be managed via a construction Transport Management Plan (App Doc Ref 5.4.19.7) [REP1-044]. During the operation of the Proposed Development all vehicle and pedestrian movements will be managed in accordance with the Outline Operational Logistics Traffic Plan (App Doc Ref 5.4.19.10) [AS-111].

Reference	Topic	Applicant's Response
	Need for the Project	The Applicant notes the comment that there is no pressing need for relocation. The release of the existing WWTP site will enable regeneration and the creation of a highly sustainable new city district delivering 8,350 homes (40% affordable), 15,000 new jobs and a wide range of community, cultural and open space facilities (including a community garden and food growing spaces, indoor and outdoor sports facilities) on a brownfield site within the urban area of Cambridge which is recognised as “the most sustainable location for strategic scale development available within Greater Cambridge”.
	Water Quality	The Applicant notes the comment regarding effective water supply and the geology of the site. The Applicant has set out in the ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [AS-040] the assessment of any impact on aquifer conditions which are considered to be negligible. The Applicant has prepared an Outline Water Quality Monitoring Plan (App Doc Ref 5.4.20.3) [REP1-046] which has been agreed in principle with the Environment Agency to deal with concerns in relation to reporting, investigating and monitoring any ground water impacts.
	Wildlife	The Applicant has undertaken ecological surveys to understand the baseline species and habitats present within appropriate buffers (Table 2-4 in ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) [AS-026] and to inform design and mitigation measures to conserve and enhance biodiversity interests. The Applicant has developed the designs for the Landscape Masterplan (Figure 3.1 within ES Appendix 8.14 Landscape, Ecology and Recreational Management Plan (App Doc Ref 5.4.8.14) [AS-066] with stakeholders and consultee input to best integrate measures that support biodiversity and ecology and retain and reinstate habitats.
	Carbon	The Applicant acknowledges the comments and concerning carbon released during construction. The Applicant refers to the ES Chapter 10 Carbon (App Doc Ref 5.2.10) [APP-042] and the impact of rebuilding the WWTP at the proposed WWTP site and the actions taken to reduce emissions and improve the design to reduce emissions.

Table 2-25: The Federation of Cambridge Residents Associations

Reference	Topic	Applicant's Response
1	General	The Applicant acknowledges the comments from the Federation of Cambridge Residents Associations and welcomes their engagement. The Applicant notes that the comments cover common themes and has sought to address each one in general below.
2	Green Belt and Planning Policy	The Applicant notes the comments in relation to development in the Green Belt. The Applicant refers to the Planning Statement (App Doc Ref 7.5) [REP1-049] . The Planning Statement presents the details on the benefits and harms of the Proposed Development and the weighing exercise necessary to determine whether the very special circumstances, in this instance for a development consent order being made in the Cambridge Green Belt, can be demonstrated. The Planning Statement also sets out the Applicant's comments on the relevant planning policy documents.
3	Water Resources	<p>The Applicant notes the comments made in relation to Water Resources and the viability of the water supply in the Cambridge region.</p> <p>The Applicant confirms that the statutory water undertaker for Cambridge is Cambridge Water. However, the Applicant sets out plans for delivery of future water resources for the region in the Anglian Water draft Water Resource Management Plan 2024 (WRMP 2024). This plan focuses on the 3 key challenges and drivers: Climate Change, the Need to Protect the Environment and Population Growth. Population growth is covered extensively in the plan and highlights a strong track record for managing the impact of growth. Anglian Water has put the same amount of water into supply now as it did back in 1989, despite a 30% population increase in that time. The Applicant has invested heavily in leakage reduction and metering since privatisation and remains at the forefront of the industry in this field. The WRMP 2024 will ensure there is sufficient water that will accommodate population growth. Part of the long term planning within the WRMP 2024 is the creation of two reservoirs one in the Fens and one in Lincolnshire. These two projects are (Nationally Significant Infrastructure Projects (NSIPs) and will go through the Development Consent Order process. As a stakeholder led process there is significant stakeholder engagement in both of these reservoir projects, with a series of consultation phases. The first phase of consultation took place between October and December 2022. This consultation phase had a strong response</p>

Reference	Topic	Applicant's Response
		<p>from stakeholders and the local communities. There will be two further phases of consultation, with ongoing consultation in between.</p> <p>The Applicant notes the comment regarding water abstraction and the geology of the site. The Applicant has set out in the ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [AS-040] the assessment of any impact on aquifer conditions which are considered to be negligible. The Applicant has prepared an Outline Water Quality Monitoring Plan (App Doc Ref 5.4.20.3) [REP1-046] which has been agreed in principle with the Environment Agency to deal with concerns in relation to reporting, investigating and monitoring any ground water impacts.</p> <p>The Applicant refers to the Other Consents and Permits Register (App Doc Ref 7.1) [REP1-047] which sets out the construction dewatering licences that are sought as part of the Proposed Development. These are temporary licences only.</p>
	Development along the River Cam	<p>The Applicant notes the comments about the users of the river Cam and the design of the outfall and can confirm it has consulted widely with stakeholders including, The Environment Agency, the Conservators of the River Cam and the Cambridge Rowing Club. The Applicant refers to the Consultation Report (App Doc Ref 6.1) [AS-115].</p> <p>The Applicant notes the comments regarding the quality of the river Cam and directs attention to the benefits set out paragraphs 4.2.19 to 4.2.35 of ES Chapter 20 Water Resources (App Doc Ref 5.2.20) [AS-040].</p>
	Other topics	<p>The Applicant notes the comments regarding leaking ancient pipes and consultations on other infrastructure but considers they are not relevant to the matters presented in the Application.</p>
	Combined Storm Overflows	<p>The Applicant acknowledges the comments. There will be no Combined Storm Overflows (CSOs) retained at the existing WWTP and no new CSOs included at the Proposed Development. The Applicant refers to section 2.3 Storm Management of Chapter 2 Project Description (App Doc Ref 5.2.2) [REP1-021] which sets out how storm management will be managed at the Proposed Development. The Applicant also refers to the benefits arising from the Proposed Development as described in paragraphs 6.2.13 and 6.2.14 of the Planning Statement (App Doc Ref 7.5) [REP1-049] which include improving storm resilience (by making storm overflows and CSOs less likely to occur) and improving the quality of recycled water returned to the River Cam (by reducing concentration in final treated effluent discharges of phosphorus, ammonia, total suspended solids and BOD).</p>

Table 2-26: The Right Hon Lucy Frazer KC MP

Topic	Applicant's Response
General	The Applicant notes and welcomes the continued engagement and comments on the Proposed Development. The Applicant has responded to similar comments during the consultation and pre-application process and refers to these earlier responses but also responds again below.
Protecting the Green Belt	The Applicant notes the comments and the impact of development in the Cambridge Green Belt. The Applicant's position on demonstrating "exceptional circumstances" to justify a grant of development consent in the Cambridge Green Belt is acknowledged and is set out in full in the Planning Statement (App Doc Ref 7.5) [REP1-049] .
Rural Character and setting	<p>The Applicant notes the comments and the permanent impact of the Proposed Development on the rural character and setting of the area.</p> <p>The Applicant has taken on board comments and concerns raised during consultation to reduce the height of the tallest structures across the whole of the proposed WWTP, as reported in Consultation Report (App Doc Ref 6.1) [AS-115]. Not only has the Applicant been able to minimise the visual impact of the tallest structures but also reduced the impact of the earth bank itself whilst still screening the vast majority of the process elements proposed to be constructed behind it. The Design and Access Statement [AS-168] elaborates on each area and shows the design development. A full assessment of Visual impacts is set out in Chapter 15 of the Environmental Statement Landscape and Visual Amenity (App Doc Ref 5.2.15 [AS-034]).</p> <p>In terms of the effects of denser planting surrounding the Proposed Development the Landscape Masterplan (App Doc Ref 5.4.8.14) [AS-066] was altered in response to comments during consultation with the Greater Cambridge Shared Planning. The Planning Authority had concerns that a large continuous belt of woodland was uncharacteristic of the Fens National Character Area or Eastern Fen Edge Chalklands Landscape Character. As a result, the Landscape Plan was reduced to scale down the woodland planting breaking it up into separate blocks with linear gaps and open glades to allow views into the meadows surrounding the earth banks. The arrangement of the blocks was carefully considered to allow views into the Proposed Development but maintain the screening of the Proposed Development from the surrounding Landscape.</p>
Traffic Access	The Applicants acknowledges the comments and the reference to the choice of vehicular access options for the Proposed Development. Four road access options (1a,1b,2 and 3) are presented in ES Chapter 3 (App Doc Ref 5.2.3) [AS-018] . The option to create a new junction off the A14 (Option 3) was discounted based on feedback received from National Highways and CCoC at the second stage of the consultation process. This stated that allowing access directly from the A14 would be contrary to Department of Transport policy (Strategic road network and the delivery of sustainable development, DfT, 2022) stating that Option 3 would only be acceptable where there was no viable alternatives, and a need for a new junction off the Strategic Road Network could be

Topic	Applicant's Response
	<p>evidenced. The ES Chapter 3 (App Doc Ref 5.2.3) [AS-018] paragraph 6.1.12 states that the wider appraisal concluded there was an alternative option to Option 3 in the form of Option 1 and it was not possible to evidence a need for a new junction off the A14.</p> <p>The Applicant has included within the design of the permanent access and the access junction shown in Design Plans – Highways and Site Access (App Doc Ref 4.11) [APP-025] a traffic island to prevent vehicles making right turns from the permanent access road on to Horningsea Road. Additionally, a commitment was made in Phase 2 Consultation to prohibit the movement of HGV traffic through the settlements of Horningsea and Fen Ditton.</p> <p>During construction all vehicle and pedestrian movements will be managed via the Construction Transport Management Plan (CTMP) (App Doc Ref 5.4.19.7) [REP1-044] and the Code of Construction Practice Part A [APP-068]. During the operation of the Proposed Development all vehicle and pedestrian movements will be managed in accordance with the Outline Operational Logistics Traffic Plan (App Doc Ref 5.4.19.10) [AS-111].</p> <p>The requirement for the monitoring of construction traffic is secured within the CTMP (App Doc Ref 5.4.19.7) [REP1-044] Section 7.2 Monitoring Strategy and Section 3.2 Logistics Manager”.</p>
Carbon Impact	<p>The Applicant notes the comments. The Applicant has provided within the Environmental Statement Chapter 10 - Carbon (App Doc Ref 5.2.10) [APP-042] an assessment of carbon emissions and proposed mitigation measures for the decommissioning of the existing facility, construction of the Proposed Development (including embedded carbon in materials), land use change (the net impact land permanently required for the Proposed Development) and the operation of the Proposed Development.</p> <p>The Strategic Carbon Assessment (App Doc Ref 7.5.2) [APP-206], also provides an assessment of the carbon benefits of relocation vs the retention of the existing site and development of an equivalent volume of homes in an alternative suburban location.</p>

Table 2-27: The Forestry Commission

Topic	Applicant's Response
	The Applicant notes The Forestry Commission's comments regarding paragraph 180(c) of the National Planning Policy Framework.
	The Applicant welcomes the engagement from The Forestry Commission and notes the comments regarding the potential impact to the two veteran trees within close proximity to the Waterbeach pipeline route as identified in the Arboricultural Impact Assessment (AIA) (App Doc Ref 5.4.8.19). The Applicant has updated the AIA to increase the Root Protection Areas from 12m to 16m, and a copy of this updated assessment was submitted at Deadline 1 [REP1-035]. The Applicant has sought further engagement and requested a combined meeting together with The Woodland Trust to review the need for any further mitigation measures to avoid any potential adverse impact. This engagement is ongoing.

Table 2-28: The Woodland Trust

Topic	Applicant's Response
Planning Policy	The Applicant notes The Woodland Trust's comment regarding paragraph 4.5.13 of The National Policy Statement for Waste Water.
Veteran Trees Figure 8.3 (AS-050)	The Applicant welcomes the engagement from The Woodland Trust and notes the comments regarding the potential impact to the two veteran trees within close proximity to the Waterbeach pipeline route as identified in the Arboricultural Impact Assessment (AIA) (App Doc Ref 5.4.8.19). The Applicant has updated the AIA to increase the Root Protection Areas from 12m to 16m, and a copy of this updated assessment was submitted at Deadline 1 [REP1-035]. The Applicant has sought further engagement and requested a combined meeting together with The Forestry Commission to review the need for any further mitigation measures to avoid any potential adverse impact. This engagement is ongoing.

Table 2-29: Liz Cotton

Topic	Applicant's Response
<p>1) the housing numbers for the counterfactual are not the same as the number of houses planned to be built on the core site. The counterfactual scenario should be for 5600 houses, not 8350.</p>	<p>The relocation project will enable the delivery of 8,350 new homes, both at the core site and in the surrounding area, and the delivery of this number of homes was therefore modelled for the proposed development. Therefore, in order to undertake a comparative assessment, we also modelled the delivery of 8,350 homes for the counterfactual scenario. If 5,600 homes were modelled, the same proportional difference between the proposed development and counterfactual would be found.</p>
<p>2) there is no reason for the homes of the counterfactual to be larger than those for the 'proposed'. This is not a requirement as stated on p10.</p>	<p>The North East Cambridge site is unique given that it is Cambridge's last major brownfield site, is located close to the City of Cambridge and a mainline railway line, and will deliver high density housing. The proposed development's buildings are expected to be mid-rise apartment blocks that enable the delivery of high density residential units (average unit size of 77m² GIA). In terms of a settlement that could represent a reasonable median comparator for the purposes of this assessment, it is unreasonable to compare the proposed development site both with a dispersed village settlement, or with an identical site in terms of housing density and location, given that it is these characteristics that make the proposed site unique. Hence, a generic suburban settlement, that has characteristics broadly in line with the sites on which 8,350 new homes could feasibly be delivered in Greater Cambridge, was chosen as a reasonable median comparator. In this case, Useful Projects used Northstowe as a suitable proxy. Residential units would largely be delivered via houses and low-rise apartment blocks in this location, which are generally lower density than mid-rise apartment blocks and have a larger average residential unit size (average unit size of 100 m² GIA). Increased market demand for larger homes in suburban locations and National Space Standards (NSS) requirements in suburban locations compared to urban locations are two key factors that underpin why there is a difference in floorspace between the proposed and counterfactual scenarios. It is reasonable to conclude that a less dense development with a larger GIA (the counterfactual) will produce significantly more emissions than a more dense development with a smaller GIA (the proposed development).</p>
<p>3) The operational carbon for the 'proposed' scenario does not account for the air conditioners : the homes would be right next to the very busy A14 and</p>	<p>This study is a high-level comparative assessment. Granular detail such as this is accordingly beyond the scope of the assessment.</p>

Topic	Applicant's Response
<p>windows would not be able to be opened because of air pollution and noise pollution.</p>	
<p>4) There is no data for a third most realistic 'somewhere in between' housing roll-out speed, in addition to the figures for conservative and optimistic figures. AW expects us to work this out for ourselves. The speed of housing roll-out is crucial to properly measuring carbon impacts in the immediate future.</p>	<p>Changing the pace of the housing delivery does not significantly affect the magnitude of the difference between the proposed development and counterfactual in terms of emissions produced. For example, under the conservative housing scenario, the counterfactual produces ~36% more emissions than the proposed development. Under the optimistic scenario, the counterfactual produces ~38% more emissions than the proposed development. The findings presented here are under the mid-point policy scenario, but are consistent across all three policy scenarios. These findings therefore demonstrate that under what is likely to be the fastest (optimistic) and slowest (conservative) potential housing roll-out timelines, the counterfactual produces a similarly greater amount of emissions than the proposed development. Therefore, it is clear that this will also be the case for a 'somewhere in between' housing roll-out scenario.</p> <p>However, the pace of the housing delivery scenario does significantly affect the when carbon emissions are generated. Under the optimistic scenario, in which all homes are built by 2042, most emissions are produced in Period 1. As expected, when the roll-out rate is slower under the conservative scenario, a larger proportion of emissions are produced in Period 2, compared to Period 1. For example, for the proposed development under the conservative scenario, P1 accounts for 34% of emissions, P2 45% and P3 21%. For the counterfactual, P1 accounts for 30%, P2 45% and P3 25%. For the proposed development under the optimistic scenario, P1 accounts for 59%, P2 22% and P3 19%. For the counterfactual, P1 accounts for 54%, P2 24% and P3 22%. Importantly though, this demonstrates that for each of the housing roll-out scenarios, there is no significant difference between the proposed development and counterfactual in terms of when emissions are produced. Therefore, it is again clear that this will also be the case for a 'somewhere in between' housing roll-out scenario.</p>
<p>5) AW does not compare like for like, in terms of environmental standards for the new plant versus standards for an upgraded one in the counterfactual scenario. Please take careful note of the phrase on p18 'Giving funding limitations it is unrealistic to retrofit the WWTP to a high level, i.e. biomethane.' The implication is that AW</p>	<p>Anglian Water is regulated by Ofwat, the Environment Agency, CCW and the Drinking Water Inspectorate. Ofwat largely determines how much funding Anglian Water receives and what it can be spent on. The funding is identified at each of Anglian Water's Asset Management Plan (AMP) Price Review business plan submissions where growth and regulatory changes are forecasted and budgeted. Anglian Water's capital delivery partners then undertake construction and commissioning in the next AMP period.</p> <p>Although retrofitting the existing WWTP to the highest standards and achieving the same level of operational and capital cost efficiencies as the proposed development could be achieved to some</p>

Topic	Applicant's Response
<p>would only upgrade to the highest environmental standards if paid for by the taxpayer. This is not a good precedent.</p>	<p>extent, Anglian Water would very likely not receive Ofwat's approval for this option. As such, this is not a commercial viable option with this project. Anglian Water is instead only likely to have funding approved for continued incremental investment in the existing WWTP over the upcoming AMP periods, progressively increasing its growth capacity and ability to meet tightening discharge permit obligations. Anglian Water therefore only provided an estimate of the emissions associated with this incremental investment, i.e. a mid-point estimate, given that it is the only reasonable counterfactual scenario - the comparator that this study is designed to compare Anglian Water's proposed development to. Maintenance and innovation investments are also planned within each AMP period. These generally improve plant performance and allow a facility's assets to be optimised. The specifics of these investments do not generally require Ofwat approval. They can have relatively quick paybacks to support business efficiency targets.</p>
<p>6) All the figures throughout this assessment talk about differences in terms of percentage increase, with one exception. AW says the carbon emissions for upgrading the current plant as opposed to rebuilding it on Honey Hill are 74% less. For consistency's sake let's express this as an increase: that's an increase of 394%. Unfortunately, even that figure is wrong.</p>	<p>The percentage figure on page 14 and page 20 has been updated. Given that this is regarding an increase in emissions from 18,000 tCO₂e (for upgrading the existing WWTP in situ) to 71,000 tCO₂e (for the proposed relocation of the WWTP), the statement is now: 'Developing a new treatment plant produces 294% more emissions than the counterfactual scenario, which involves modernising and upgrading the existing facility.'" However, the underlying numbers have remained unchanged.</p>
<p>8) The document does not quantify the carbon impact of the demolition of the existing plant, nor the remediation of the land, despite saying that it would.</p>	<p>Emissions from the demolition of the existing WWTP are not included in the Environmental Impact Assessment (EIA). It is not part of the scope of this proposal and that work will be done by the future developer and considered as part of a separate planning application. It is likely to include the effects of emissions from plant used in demolition, taking into account the re-use of materials including secondary aggregate, recovered steel and other equipment. Chapter 2 Project Description paragraph 1.4.7 states that consent is not sought under the Development Consent Order for the subsequent demolition or redevelopment of the Cowley Road site. However, the Applicant has undertaken an assessment of the indicative scale of demolition emissions based on structure volumes and site area to be cleared on the existing site to demonstrate the likely scale of these emissions. These are outlined below and will be provided by Deadline 3 as part of an updated 7.5.2 Planning Statement Strategic Carbon Assessment [APP-206].[MOU1] [PD2]</p>

Topic	Applicant's Response
	<p>Anglian Water's estimate of the emissions associated with demolition, material processing, transport away from site, and ground remediation is 3,865 tCO₂e. If this is added to the mid-point estimate of embodied and operational emissions for the WWTP (71,000 tCO₂e), these emissions represent ~5% of total WWTP emissions. They represent ~0.3% of total emissions for the proposed development under the mid-point scenario (1,400,000 tCO₂e). Several conservative assumptions have been made with this estimate, including locating the disposal site 50km away from the demolition site (there are many things that could be done to reuse aggregate on site or locally) and that the plant and transport is exclusively diesel powered.</p> <p>The report commissioned by Save Honey Hill Group also estimates the emissions associated with decommissioning of the site, demolition of structures, material processing and ground remediation. It arrives at a slightly lower but similar estimate of 2,800 tCO₂e. If this added to the mid-point estimate of embodied and operational emissions for the WWTP (71,000 tCO₂e), these emissions represent ~4% of total WWTP emissions. They represent ~0.2% of total emissions for the proposed development under the mid-point scenario (1,400,000 tCO₂e).</p> <p>Although these emissions are not negligible, they are not significant enough to change the key finding of this comparative assessment. A note has been added to the Strategic Carbon Assessment report detailing these demolition emissions.</p>
<p>9) Most importantly, as we all know, the only figures that should be compared are those produced within Period 1 (2026-2042). There can be no offsetting of carbon emissions with future savings up to 2080. Unfortunately, the climate emergency is now, and, as recognised by the Environmental Audit Committee's report on carbon in the construction May 2022, demolition and rebuild should be avoided wherever possible</p>	<p>As demonstrated on page 13 and page 19, emissions produced by the proposed development are lower than those produced by the counterfactual for all Periods, including Period 1 (2026-2042). This finding is consistent across all three policy scenarios. This is because, despite the higher emissions associated with constructing the new plant in Period 1, emissions associated with housing and commuting are significantly lower for this scenario compared to the counterfactual. Consequently, proceeding with the proposed development, when compared to a reasonable alternative scenario, helps to mitigate the climate emergency.</p>
<p>Anglian Water has failed to prove that the site of the existing sewage plant is the 'most sustainable location' for housing.</p>	<p>The key finding of this comparative assessment – that proceeding with the proposed development will produce significantly fewer emissions than if the housing was delivered on a feasible site elsewhere in Greater Cambridge - is fundamentally driven by two key reasons. Firstly, the residential units of the</p>

Topic	Applicant's Response
	counterfactual development will have a larger floor area, which significantly increases embodied carbon emissions. Secondly, as the development would be located further away from the City of Cambridge, it would produce more transport emissions due to increased car usage, and reduced public transport usage, walking and cycling.

Get in touch

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