

Comments on the Deadline 2 Submissions

This document sets out the comments by Cambridgeshire County Council (**CCC**) on Deadline 2 (**D2**) submissions. The tables below set out the document in question that the Council is commenting on, together with the relevant paragraph or reference number.

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

Deadline 2 (D2) Submission - 5.4.8.15 Environmental Statement Volume 4 Chapter 8 Appendix 8.15 HRA Screening Report [REP2-022]/[REP2-023]

Topic	Paragraph Number	Councils' Comment
Affected Sites	4.2.10, 4.3.4, 4.4.4 and 5.1.3	The Council welcomes the "screening in" of possible Likely Significant Effects on Eversden and Wimpole Woods SAC, as a result of potential changes to foraging and commuting habitat for its barbastelle feature.

Deadline 2 (D2) Submission - 5.4.8.16 Environmental Statement Volume 4 Chapter 8 Appendix 8.16 Habitats Regulations Assessment Report Deadline [REP2-024]/[REP2-025]

Topic	Paragraph Number	Councils' Comment
Eversden and Wimpole Woods SAC	3.1.6	The Council welcomes the inclusion of possible likely significant effects on Eversden and Wimpole Woods SAC included within the Appropriate Assessment. The Council's position set out at paragraph 5.15 of LIR [REP1-133] remains unchanged - the Council agrees there will be no likely significant impact on the integrity of a European site.

Deadline 2 (D2) Submission - 5.2.8 Environmental Statement Volume 2 Chapter 8 Biodiversity [REP2-007]/[REP2-008]

Topic	Paragraph Number	Councils' Comment
Ancient woodland and veteran trees	3.1.13	It is unclear why veteran oaks, referenced within paragraph 3.1.13, are not given further consideration or assessment as part of the ES Chapter 8 Biodiversity. Particularly given that Figure 8.3, Chapter 8 Book of Figures Biodiversity [REP2-019] states the following mitigation: " <i>impacts avoided by micro-siting of Waterbeach pipeline away from tree</i> ".

Priority habitats (hedgerows)	3.1.23	The Council is concerned that an important hedgerows will now be “ <i>directly impacted by construction, due to open cut trench passing through a section</i> ”. In previous iterations of Chapter 8, there were no impacts identified on important hedgerows. Why is it not possible to utilise an alternative method (HDD), which is being utilised elsewhere on the scheme to avoid direct impact on ecological features?
-------------------------------	--------	--

Deadline 2 (D2) Submission - 5.3.8 Environmental Statement Volume 3 Chapter 8 Book of Figures Biodiversity [REP2-019]

Topic	Paragraph Number	Councils' Comment
		The Council is unclear what Figures have been updated, given that no tracked changes / explanatory text has been included to explain differences with previous submissions.
Veteran oak trees	Figure 8.3	It is noted that the drawing has been updated to confirm “ <i>Veteran Oak - impacts avoided by micro-siting of Waterbeach pipeline away from tree</i> ” for both veteran oaks.

Deadline 2 (D2) Submission - 5.4.8.13 Environmental Statement Volume 4 Chapter 8 Appendix 8.13 BNG Assessment Report [REP2-020]/[REP2-021]

Topic	Paragraph Number	Councils' Comment
Summary	Page v	The Councils welcome the update of BNG figures, which addresses previous concerns regarding inconsistencies.
Indicative Alignment of Proposed Ditches	Figure 1, Annex C	<p>The Council welcomes the submission of a drawing showing the (indicative) proposed ditch / reedbed creation within Work Area 39.</p> <p>Unfortunately, the colours used on the drawing make it impossible to identify the location of the proposed reedbed. In addition, it is unclear what the pink zone demarcates.</p> <p>The Council notes the Work Area 39 is shown in blue on the map but no provision for ecological mitigation has been shown on the drawing (apart from the area shown in 'pink'). The Council seeks clarification as to what ecological mitigation is proposed for the entire Work Area 39.</p> <p>The Outline Outfall Management & Monitoring Plan [REP2-026]/[REP2-027] states that Work Area 39 will be reseeded with 'other neutral grassland' following the ditch / reedbed creation works. This habitat restoration should be included on Figure 1, and discussed within Annex C.</p>

Deadline 2 (D2) Submission - 8.12 Applicant's Comments on responses to ExQ1 [REP2-037]

Topic	Paragraph Number	Councils' Comment
5 Biodiversity 5.14 – Comments on updated information	10	The Council welcomes information provided, which resolves concerns raised regarding Code of Construction Practice Part B (reason for excluding BNG rivers).

		<p>The Council looks forward to seeing an update to Biodiversity Chapter (to resolve errors) and further information regarding securing BNG (at deadline 3).</p> <p>The Council still seeks the update of the Lighting Strategy to better reflect protection for wildlife, upon which detailed lighting design for construction and operation (requirements 14 and 7, respectively) will be based.</p>
GHG calculations – clarification of information	Table 2-4 Ref. 6.5	Cambridgeshire County Council thanks the Applicant for their clarifications and will review these points again when the updated version of APP-109 becomes available following Deadline 3.

Deadline 2 (D2) Submission - 5.4.20.13 Environmental Statement Volume 4 Chapter 20 Appendix 20.13 Outline Water Quality Monitoring Plan [REP2-028]/[REP2-029]

Topic	Paragraph Number	Councils' Comment
Appendix A – Effects and Mitigation Summary	Table 2.4 and Table 2.6	The Council welcomes clarification for the proposed water quality monitoring programme for black ditch, Allicky Farm Ponds County Wildlife Site and Stow-cum-Quy Fen SSSI (The Cut). This resolves the Council's concerns regarding water quality monitoring of Stow-cum-Quy Fen SSSI and Allicky Farm Ponds County Wildlife Site set out at paragraphs 5.16-5.19 & 5.32 of the Council's LIR [REP1-133].

Deadline 2 (D2) Submission - 5.4.8.24 Environmental Statement Volume 4 Chapter 8 Appendix 8.24 Outline Outfall Management & Monitoring Plan [REP2-026]/[REP2-027]

Topic	Paragraph Number	Councils' Comment
Pre-construction	3.2.2, page 16	The Council welcomes confirmation that the Outfall Management and Monitoring Plan for construction will include new ditch works in Work No. 39 (including creation of reedbed habitat). However, their construction is not reflected within Table 5-1 (see below)
Pre-construction - Ditch habitat creation in Work No. 39 area	Table 5-1, page 31	<p>The Council remain unclear as to how the detailed design for habitat creation within Work Areas 32 and 39 will be secured, given it hasn't been included in the OMMP and fall outside the scope of the Landscape, Ecological and Recreational Management Plan [AS-067].</p> <p>Currently, pre-commencement works listed in Table 5-1 only includes a detailed design and construction method statement for ditches associated with water vole habitat in Works Area 39. There appears to be no requirement for detailed design for:</p> <ul style="list-style-type: none"> (a) wetland to be created / reinstated in Work Area 32 (River Cam) (b) reinstatement of construction compound to 'Other Neutral Grassland' (c) ditches and reedbed created for Biodiversity Net Gain within Work Area 39 (d) other neutral grassland to be sown within Work Area 39

		<p>(e) fencing construction to keep people / animals out of Work Area 39</p> <p>The Council requires confirmation that a detailed design and construction method statement for all habitat creation / reinstatement works in Work Areas 32 & 39 will be approved and integrated into the detailed OMMP (as part of pre-construction phase).</p>
Operational phase	Table 5-2, Page 37	<p>The Council is concerned that no management of habitats has been identified as part of operational phase for:</p> <ul style="list-style-type: none"> (a) reinstated ditches (b) reinstated habitats of construction compound, including other neutral grassland (c) wetland habitats created at Outfall (shown on 4.13.3 Design Plans – Outfall [APP-027]) (d) ditches, reedbed and other neutral grassland to be created within Work Area 39 <p>A detailed habitat management plan should be produced as part of the operational OMMP and implemented in full, as discussed below.</p>
7.4 Operation	7.4.8, page 51	<p>The Council is concerned that no habitat management is proposed for the operational phase.</p> <p>The Council is unclear how management will be delivered to ensure habitat establishment and delivery of BNG / water vole mitigation, particularly given the works to Work Areas 32 & 39 fall outside the remit of the Landscape, Ecological and Recreational Management Plan [AS-067].</p> <p>We would expect the operational OMMP to include a Landscape and Ecological Management Plan / Habitat Management and Monitoring Plan.</p>
7.4 Operation – Ditch and reedbed habitats	7.4.8, page 51	<p>The creation of ‘other neutral grassland’ is welcomed. The land is currently shown as ‘ruderal’ on Figure 8.6 - Phase 1 habitat, Book of Figures Biodiversity [REP2-019]. Therefore, it is important to include:</p> <ul style="list-style-type: none"> (a) details of grassland creation within detailed design stage (in the construction OMMP); and (b) effective management to establish the desired grassland and manage unwanted ruderal/ephemeral species (in the operational OMMP). <p>Currently this has been omitted from the OMMP, as discussed above</p>

END