

Cambridge Waste Water Treatment Plant Relocation Project  
Anglian Water Services Limited

# Applicant's comments on Save Honey Hill's Deadline 2 submissions

Application Document Reference: 8.14  
PINS Project Reference: WW010003  
APFP Regulation No. n/a

**Revision No. 01**  
18 December 2023

## Document Control

<b>Document title</b>	Applicant's comments on Save Honey Hill's Deadline 2 submissions
<b>Version No.</b>	01
<b>Date Approved</b>	18/12/23
<b>Date 1<sup>st</sup> Issued</b>	18/12/23

## Version History

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Description of change</b>
01	18/12/23	-	Submitted to ExA at Deadline 3.

## Contents

<b>1</b>	<b>Introduction .....</b>	<b>2</b>
1.1	Introduction .....	2
<b>2</b>	<b>Applicant's comments on submissions received by SHH at Deadline 2 .....</b>	<b>3</b>
2.1	Comments on SCDC responses to ExQ1 (SHH18) [REP2-059] .....	3
2.2	SHH comments on Environment Agency Response to ExA Questions (SHH26) [REP2-060].....	3
2.3	SHH comments on Cambridge City Council's Responses to ExQ1 (SHH29) [REP2-061] 4	4
2.4	SHH comments on Cambridgeshire County Council's Responses to ExQ1 (SHH30) [REP2-062].....	4
2.5	SHH comments on Applicant's responses to ExA's ExQ1 (SHH28) [REP2-063] .....	4
2.6	SHH comments on CCoC's Local Impact Report (SHH19) [REP2-064] .....	6
2.7	SHH comments on CCC's Local Impact Report (SHH21) [REP2-065] .....	6
2.8	SHH comments on SCDC's Local Impact Report (SHH20) [REP2-065] .....	7
2.9	Funding and Development Arrangements (SHH 22) [REP2-067] .....	7

# 1 Introduction

## 1.1 Introduction

- 1.1.1 This document provides Anglian Water Services Limited (the Applicant) comments on submissions received at Deadline 2 from Save Honey Hill for the Cambridge Waste Water Treatment Plant Relocation Project (CWWTPRP).
- 1.1.2 The Applicant has responded to the following submissions made by the Save Honey Hill (SHH) Group at Deadline 2:
- Comments on SCDC responses to ExQ1 (SHH18) [REP2-059]
  - Comments on Cambridgeshire County Council LIR (SHH19) [REP2-065]
  - Comments on SCDC LIR (SHH20) [REP2-066]
  - Comments on Cambridge City Council LIR (SHH21) [REP2-065]
  - Funding and Development arrangements (SHH22) [REP2-067]
  - Comments on EA Responses to ExQ1 (SHH26) [REP2-060]
  - Comments on Applicant's responses to ExQ1 (SHH28) [REP2-063]
  - Comments on Cambridge City Council Responses to ExQ1 (SHH29) [REP2-061]
  - Comments on Cambridgeshire County Council Response to ExQ1 (SHH30) [REP2-062]
- 1.1.3 The Applicant has no comments to make on the following submissions made by SHH at Deadline 2:
- Errors and Omissions in Planning Statement (SHH23) [REP2-068]
  - Comments on Natural England's WR (including comments on NE's responses to ExQ1) (SHH27) [REP2-069]
  - Comments on AW-EA SoCG [REP2-070].
- 1.1.4 The Applicant has not sought to address each issue in this response or to duplicate information found elsewhere. Instead, it seeks to address any significant misunderstandings or misrepresentations, primarily by reference to existing documents.
- 1.1.5 SHH's comments on the local plan process and potential alternative sites for housing provision are not discussed in this document. The Applicant will make further representations on these issues if requested by ExA.
- 1.1.6 Although not submitted to the ExA as part of their Deadline 2 submissions, Save Honey Hill did submit directly to the Applicant a number of proposed changes to the draft Development Consent Order. For transparency the Applicant has appended these, along with the Applicant's responses to this document.

## 2 Applicant's comments on submissions received by SHH at Deadline 2

### 2.1 Comments on SCDC responses to ExQ1 (SHH18) [REP2-059]

#### **21.20 "The Applicant remains reluctant..."**

- 2.1.1 The Applicant refers to the Planning Statement (see paragraphs 1.3.3, 1.7.4, 2.2.14 and 4.8.12)

### 2.2 SHH comments on Environment Agency Response to ExA Questions (SHH26) [REP2-060]

#### **2.20 "The Applicant has yet to demonstrate satisfactorily that the PD is sized to meet the reasonable expectations..."**

- 2.2.1 The Applicant has clearly stated that the proposed development is appropriately sized to allow for all foreseeable future growth. The Applicant refers to the Environmental Statement project description (**REP1-021**, see paragraphs 1.6.8-1.6.10 and 4.1.7) and Planning Statement (see paragraphs 1.3.3, 1.7.4, 2.2.14 and 4.8.12). The Applicant also refers to its response to ExAQ1 (1.4. of **REP1-079**).

#### **15.2 "SHH has raised extensive concerns including the adequacy of the design and footprint of works needed to ensure that the development can secure these..."**

- 2.2.2 The Applicant refers to NPSWW section 3.7 and PINS Advice Note 11, Annex D. It is the EA's view which is relevant here, not SHH's.

#### **15.3 Proposed design modification**

- 2.2.3 This mitigation is provided through the environmental permits for the site which, alongside the need to agree the drainage design prior to commencement of construction (R15 of DCO, **REP1-003**), is sufficient to regulate activities on the site. The Applicant refers to NPSWW section 3.7 and PINS Advice Note 11, Annex D, in support of its reliance on the EA's position.

#### **15.5 Demolition and remediation**

- 2.2.4 As previously stated, demolition is outside of the scope of the DCO application under examination. Other statutory processes will cover those activities. The Applicant refers to 1.18 of its responses to ExAQ1 (**REP1-079**).

#### **21.30 Scrutiny of permits**

- 2.2.5 The Applicant disagreed with this assertion. It refers to the NPSWW provisions in this respect (see 15.2 above)

### **21.5 Future treatment standards**

- 2.2.6 The Applicant refers to the Environmental Statement Project Description (**REP1-021**, see paragraphs 1.6.8-1.6.10 and 4.1.7). There is sufficient space within the design to upgrade treatment if required in future permits, including in respect of phosphate, as well as accommodate foreseeable growth. The treatment standards for the plant are regulated through the relevant environmental permits; the Environment Agency sets appropriate limits to which the plant design is fully able to respond to over time or in response to regulatory requirements. The Applicant refers to NPSWW section 3.7 and PINS Advice Note 11, Annex D. It is the EA's view which is relevant here, not SHH's.

### **21.8**

- 2.2.7 See response to 15.3 above (at para 2.2.3).

## **2.3 SHH comments on Cambridge City Council's Responses to ExQ1 (SHH29) [REP2-061]**

### **Q2.1 answer b) note 3 "The references to NPSWWs... on NSIPS do not apply..."**

- 2.3.1 The Applicant disagrees with this interpretation and refers to its response to ExAQ1 in respect of the effect of the NPSWW (2.3, **REP1-079**).

## **2.4 SHH comments on Cambridgeshire County Council's Responses to ExQ1 (SHH30) [REP2-062]**

### **7.23 Vehicular access to Low Fen Drove Way**

- 2.4.1 As discussed at ISH1, there is no relationship between the current usage of Low Fen Drove Way and the proposed development.

## **2.5 SHH comments on Applicant's responses to ExA's ExQ1 (SHH28) [REP2-063]**

### **2.17**

- 2.5.1 The Applicant has answered the question by referring to the Secretary of State's s.35 direction; the importance of the project is primarily derived from its facilitation of the delivery of housing. ExA will appreciate that the Secretary of State's reasoning in the s.35 decision letter is not the subject of the current examination, but it is relevant to the answer to this question.

### **2.19**

- 2.5.2 The Applicant considers that the issue of capacity is fully addressed in its response, notably in the first paragraph (**REP1-079**) and the cross-references cited there.

**2.27f and 2.27g**

- 2.5.3 The location of the Application site is consistent with the "long tunnel" option in the HIF bid. However, the Applicant considers that this information is not relevant to the current examination. As set out below (2.28 and 8.15, see also comments below on **REP2-067**) the Applicant believes that SHH is not applying the appropriate legal tests, either in respect of alternatives or funding and refers the stakeholder to paragraph 2.5.5 below.

**2.28**

- 2.5.4 SHH is correct in asserting that land value was not a criterion applied in the earlier stage of site selection. However, this criterion was not, in the words of SHH "*applied to ensure the exclusion of Site 2*". Site 2 was excluded through the application of clear and reasonable criteria which are described in the relevant site selection reports, and which were the subject of public consultation. Site 2 performed poorly on a number of criteria, ExA is referred to sections 4 and 6 of the Stage 4 - Final Site Selection report (**APP-078**).
- 2.5.5 The Applicant believes that SHH continues to apply inappropriate tests in respect of alternatives and most of the information provided in this respect is irrelevant to the issues before ExA. The Applicant will make further legal submissions to ExA on the appropriate tests on alternatives if required. SHH appears to be implying that cost should not be a factor in site selection. That is clearly not a logical position, particularly where public funding is involved. The justification for the site selection criteria is set out in the site selection reports, including **APP-078** referred to above.

**5.32**

- 2.5.6 The Applicant's DCO drafting does not include Parish Councils as intended consultees in relation to the discharge of Requirements. Parish Councils do not have statutory duties in respect of biodiversity.

**7.25c**

- 2.5.7 The Applicant is providing protections in respect of the potential for anti-social behaviour or nuisance car-parking through the proposed s.106 agreements (**AS-127** and **AS-134**, to be updated at Deadline 3).

**8.15, 8.25 and 8.26**

- 2.5.8 The Applicant believes that SHH is applying an inappropriate test in respect of the funding of the project. The Applicant has provided evidence in its Funding Statement that there are (a) sufficient funds to ensure that compulsory acquisition costs will be forthcoming and (b) that the project is deliverable. Paragraphs 17 and 18 of the Planning Act 2008: Guidance related to Procedures for the Compulsory Acquisition of Land do not require the Applicant to show that all funding to deliver the project has been secured prior to grant of consent. Rather, the Applicant should provide 'as much information as possible about the resource implications of both acquiring the land and implementing the project' and should demonstrate that 'adequate funding is likely to be available' (emphasis added). This principle has

been accepted in respect of many other DCO decisions. Furthermore, paragraph 17 of that Guidance expressly acknowledges that it may be that details cannot be finalised until a later stage, in which instance the Applicant should 'provide an indication of how any potential shortfalls are intended to be met' (emphasis added). The Applicant will make further legal submissions to ExA on the appropriate tests if required.

**21.3 and 21.20**

- 2.5.9 The Applicant has clearly stated that the proposed development is appropriately sized to allow for all foreseeable future growth. The Applicant refers to the Environmental Statement project description (**REP1-021**, see paragraphs 1.6.8-1.6.10 and 4.1.7) and Planning Statement (see paragraphs 1.3.3, 1.7.4, 2.2.14 and 4.8.12). The Applicant also refers to its response to ExAQ1 (1.4. of **REP1-079**).

**21.23**

- 2.5.10 The Applicant believes that SHH continues to apply inappropriate tests in respect of alternatives and most of the information provided in this respect is irrelevant to the issues before ExA. The Applicant will make further legal submissions to ExA on the appropriate tests on alternatives if required.

**21.33 "SHH believes it is essential that the discharge permits are substantially determined in time for their provisions to be explored by the ExA, prior to the close of the Examination"**

- 2.5.11 The Applicant refers to NPSWW section 3.7 and PINS Advice Note 11, Annex D. There is no requirement for the permits to be substantially determined, or for their provisions to be explored. It is the EA's view which is relevant here, not SHH's.

**21.56 and 21.61**

- 2.5.12 SHH appear to be confusing the Rochdale principles with assumptions around the future baseline. These are separate concepts.

## **2.6 SHH comments on CCoC's Local Impact Report (SHH19) [REP2-064]**

**2.3 "The references to NPSWWs... on NSIPS do not apply..."**

- 2.6.1 The Applicant disagrees with this interpretation and refers to its response to ExAQ1 in respect of the effect of the NPSWW (2.3, **REP1-079**).

## **2.7 SHH comments on CCC's Local Impact Report (SHH21) [REP2-065]**

**4.1 and 4.3 "The references to NPSWWs... on NSIPS do not apply..."**

- 2.7.1 The Applicant disagrees with this interpretation and refers to its response to ExAQ1 in respect of the effect of the NPSWW (2.3, **REP1-079**).



**6.67, 6.6.8, 6.70 and 6.71**

- 2.7.2 The Applicant refers to 21.58 of its response to ExAQ1 (**REP1-079**) in respect of water supply issues in the Cambridge area.

**6.74**

- 2.7.3 The proposed delivery date for the Fens Reservoir of 2037 is confirmed in the draft WRMP and in the consultation material cited by SHH.

**2.8 SHH comments on SCDC's Local Impact Report (SHH20) [REP2-065]**

**4.1 and 4.2 - status of NPSWW**

- 2.8.1 The Applicant disagrees with this interpretation and refers to its response to ExAQ1 in respect of the effect of the NPSWW (2.3, **REP1-079**).

**2.9 Funding and Development Arrangements (SHH 22) [REP2-067]**

- 2.9.1 The Applicant believes that SHH, in its analysis of the HIF funding process, is incorrectly conflating a number of separate issues, and, particularly, is confusing (a) the evidence which the submitted HIF documentation provides around the project's needs case (that relocation is an enabler of housing development) with separate and distinct issues concerning (b) the consideration of alternatives and (c) the level of evidence required to show the relocation is economically viable.
- 2.9.2 In respect of (a), the Applicant considers that the information submitted in respect of the HIF documentation, together with the representations made by Homes England (the government's statutory housing delivery agency) supports the case that there is sufficient certainty the project relocation would enable housing delivery. The Applicant has further strengthened the certainty in respect of the enabling of housing delivery by committing to a decommissioning timetable in the draft DCO submitted at Deadline 3.
- 2.9.3 In respect of (b); the Applicant believes that SHH continues to apply inappropriate tests in respect of alternatives and most of the information provided in this respect is irrelevant to the issues before ExA. The Applicant will make further legal submissions to ExA on the appropriate tests on alternatives if required by the ExA.
- 2.9.4 In respect of (c); the Applicant believes that SHH is applying an inappropriate test in respect of the funding of the project. The Applicant has provided evidence in its Funding Statement that there are (a) sufficient funds to ensure that compulsory acquisition costs will be forthcoming and (b) that the project is deliverable. Paragraphs 17 and 18 of the Planning Act 2008: Guidance related to Procedures for the Compulsory Acquisition of Land do not require the Applicant to show that all funding to deliver the project has been secured prior to grant of consent. Rather, the Applicant should provide 'as much information as possible

about the resource implications of both acquiring the land and implementing the project' and should demonstrate that 'adequate funding is likely to be available' (emphasis added).

- 2.9.5 This principle has been accepted in respect of many other DCO decisions. Furthermore, paragraph 17 of that Guidance expressly acknowledges that it may be that details cannot be finalised until a later stage, in which instance the Applicant should 'provide an indication of how any potential shortfalls are intended to be met' (emphasis added). The Applicant will make further legal submissions to ExA on the appropriate tests if required.

**Response to Save Honey Hill Comments on Schedule 2 – Requirements**

Save Honey Hill has provided the Applicant with a track changed version of the Requirements as set out in Part 1 of Schedule 2 to the draft Development Consent Order (“DCO”). This note forms the Applicant’s response to those changes and comments.

Where Save Honey Hill simply noted an addition as made by the Applicant in the draft DCO submitted for Deadline 1, the Applicant has not added that comment to the table below. By way of example, at Requirement 9, Save Honey Hill commented that “the amendments in Rev 05 [of the DCO] relating to Requirement 9 are noted.”

Drafting (where relevant)	Comment from Save Honey Hill	Applicant’s Response
None	Save Honey Hill “Would like Requirements to include general requirement for relevant planning authority to consult with SCDC/Cambridge City Council as appropriate. Were it a waste planning application this is a normal requirement”	As per the Applicant’s response to WQ 10.12: Should the relevant planning authority, want to consult with the other planning authorities, it may do so, but it is not proposed to prescribe this via the drafting of the DCO. Should an authority want consultation to be addressed via the drafting, it can raise this with the ExA.  The Applicant has, however, made limited references to consultation with other bodies in the requirements where Natural England and the Environment Agency specifically require consultation on particular elements.
“construction workers travel plan” means the document of that description certified by the Secretary of State as the construction workers travel plan for the purposes of this Order under article 51 (certification of plans etc.) or any revision to it as may be agreed from time to time with <del>in</del> the relevant planning authority;	Save Honey Hill asked the Applicant to “Note edit”	The Applicant has made this change and it will be shown in the DCO submitted at Deadline 3.
“enabling works” comprise the following works as more particularly detailed in paragraph 3.1.6 of chapter 2 (project description) of the environmental statement (Document 5.2.2)—	Save Honey Hill stated “Amendments made in Rev 05 noted. Still requires explanation as to why (j) now (k) is necessary as an enabling work”	Please refer to ExQ response to 10.15 and 10.25. The Applicant confirms that all works listed are specific works which have been carved out as being necessary for site mobilisation.

<p>"outline operational water quality monitoring plan" means the document of that description certified by the Secretary of State as the operational outline water quality monitoring plan for the purposes of this Order under article 51 (certification of plans etc.) or any revision to it as may be agreed from time to time within the relevant planning authority;</p>	<p>Save Honey Hill point out that this definition was "deleted in Rev 05" of the draft DCO</p>	<p>The Applicant confirms this was changed to the 'outline water quality monitoring plan'. This is because the management plan covers both the operation and construction of the Project. Pursuant to Requirement 9, any construction environmental management plan submitted for approval must be accompanied by a detailed construction water quality monitoring plan which must accord with the measures set out in the outline water quality management plan relating to construction. Requirement 22 now relates to operational water quality monitoring only.</p>
<p>Phasing</p> <p>3—(1) Save for the enabling phase, the authorised development must not be commenced until a written scheme setting out the subsequent phase or phases of construction of the authorised development and the works to form part of each phase has been submitted to and approved by the relevant planning authority.</p> <p>(2) The scheme submitted under sub-paragraph (1) must confirm whether the undertaker intends to construct either a CHP or gas to grid facility as part of Work No. 9.</p>	<p>Save Honey Hill commented that sub-paragraph (2) "Needs to be a commitment before the DCO is granted"</p>	<p>The Applicant does not agree with this. This detail must be submitted prior to commencement of the authorised development (save for the enabling phase) and this is the appropriate juncture for the Applicant to confirm which element it is constructing as part of Work No. 9.</p> <p>In any event, it is impossible to have a Requirement take effect before the DCO is made.</p>
<p>Approved Details and amendments to them</p> <p>6...</p> <p>Any amendments to or variations from documents or approved details must be in accordance with the principles and assessments set out in the environmental statement. Such agreement may only be given in relation to immaterial changes where it has been demonstrated to the relevant planning authority that the subject matter of the agreement sought</p>	<p>Save Honey Hill stated that "This precludes any amendments that give rise to material effects, unless a 'further ES submission and publicity' requirement is added here."</p>	<p>The Applicant has followed PINS Advice Note 15 in drafting the DCO and particularly Good Practice Point 4 which states:</p> <p>Requirements may trigger the need for a subsequent application (under the 2017 EIA Regulations). The procedure for considering the environmental effects of such applications is set out in the 2017 EIA Regulations and therefore applicants do not need to prescribe the way in which the discharging authority should take account of environmental effects. (For example,</p>

<p>is unlikely to give rise to any materially new or materially different environmental effects from those assessed in the environmental statement.</p>		<p>by confining the scope of what may be approved in a subsequent application to matters which were the subject of the original ES.)</p> <p>Applicants should however ensure, when applying (under section 120 of the PA2008) any Orders, Rules or Regulations made under other legislation in relation to a consent, agreement or approval of a discharging authority under a Requirement (or when a bespoke procedure is created for discharging Requirements – see section 21), that the Article could not be construed as circumventing the provisions of the 2017 EIA Regulations. This could be achieved for example by inserting wording in relation to the applied provisions such as “insofar as those provisions are not inconsistent with the 2017 EIA Regulations and any orders, rules or regulations made under the PA2008”.</p> <p>The Applicant does not propose to amend this drafting.</p>
<p>Detailed design</p> <p>7— No phase of the authorised development is to commence until details of—</p> <p>the layout, scale, design and external appearance of any plant and buildings;</p> <p>the materials and finishes to be used to construct any buildings;</p> <p>landscape planting;</p> <p>highway design;</p> <p>operational lighting;</p> <p>a construction method statement; and</p>	<p>Save Honey Hill commented that ‘details of electric vehicle parking provision’ was a “weird detail” to include since it “only applies to one small element of the scheme, the car park.”</p>	<p>EV charging forms part of Work No. 2 and Work No. 7. The Applicant considers it appropriate that details are provided as full detail cannot be confirmed at the application stage.</p>

details of electric vehicle parking provision		
7(2) The details submitted must include an explanation of how they accord with the design objectives set out in section 11 of the design and access statement or an explanation of why this is not reasonably practicable.	Save Honey Hill stated "As set out in SHH RR, these are inadequately specified in section 11 and need to be replaced by a more specific set of Design Requirements before the DCO is granted"	The Applicant refers to ExQs 9.1, 9.6 and 9.7 which address this. For the sake of completeness, the Applicant confirms that this Requirement has been amended as part of the DCO submitted for Deadline 3 as follows:  <i>7(2) The details submitted must accord with the design code.</i>
10(2) The detailed construction outfall management and monitoring plan <del>shall</del> <i>may</i> be revised from time to time in accordance with requirement 6 following consultation with the Environment Agency and Natural England to reflect the requirements of any environmental permit, protected species licence or land drainage consent.	Save Honey Hill amended this requirement to replace 'shall' with 'may'.	The Applicant does not agree the substitution of 'may' for 'shall'. This subparagraph is intended to allow for variations to the COMMP as is required – it is therefore intentionally drafted to be permissive and not mandatory. It is Requirement 6 which then secures approval with the revised details.
<p>Outfall</p> <p>10(4) The detailed operational outfall management and monitoring plan submitted for approval must accord with the measures set out in the outline outfall management and monitoring plan relating to the operation of the outfall and must include—</p> <ol style="list-style-type: none"> <li>a. details of proposal for monitoring scour and bank erosion <u>and the ecological impacts of outfall operation</u>;</li> <li>b. potential adaptive management measures in the event of erosion arising from outfall operation;</li> <li>c. the circumstances in which adaptive management measures will be deployed;</li> </ol>	Save Honey Hill has made the amendments shown in red.	<p>The Applicant does not agree that additional wording is necessary. The monitoring and management of ecological impacts during construction and operation is secured through the provisions of the OMMP. In construction the OMMP would cover</p> <ul style="list-style-type: none"> <li>• monitoring and management of activities related to the construction to the outfall and riverbank protection works including safeguarding of environmental (including ecological) features and avoiding or minimising water quality impacts</li> <li>• monitoring and management of activities related to the construction to the final effluent and storm pipeline involving the crossing of the existing ditch</li> <li>• monitoring and management of the works to create ditches and reedbed (and adjacent</li> </ul>

<p>d. details of ditch monitoring and maintenance measures; and  e. proposals for the provision, <u>monitoring</u> and maintenance of any biodiversity net gain comprising river units.</p>		<p>grassland habitats) in works No 39 including the water vole ditch</p> <ul style="list-style-type: none"> <li>• monitoring and management of dewatering activities associated with construction works in Works No 32 and 39 including safeguarding of environmental features and avoiding or minimising water quality impacts</li> </ul> <p>In operation the OMMP would cover</p> <ul style="list-style-type: none"> <li>• monitoring and management of habitats associated with the riparian edge of the river cam associated with the embedded design feature as part of the new section of river bank protection</li> <li>• monitoring and management of the reinstated section of ditch habitat</li> <li>• monitoring and management of the ditches, reedbed, and adjacent grassland habitats in works No 39 including the water vole ditch</li> <li>• monitoring and management of the effect of the operation of the outfall in relation to scour of low frequency high flow events</li> </ul> <p>There are additional protections included in the Flood Risk Activity Permits and the dewatering permits agreed with The Environment Agency and the protected species licences agreed with Natural England.</p>
<p>11. –(1) No phase of the authorised development is to commence until a detailed landscape ecological and recreational management plan (detailed LERMP) has been submitted to and approved by the relevant planning authority <u>following consultation with South Cambridgeshire District Council, Cambridge City Council, Natural England and the Environment Agency.</u></p>	<p>Save Honey Hill added the wording in red but noted that it can be removed "if the requirement to consult City/SCDC is made general".</p>	<p>Please see the response to the first line of this table which is also relevant here. The Applicant does not intend to make this change.</p>

<p>12(2) The detailed operational workers travel plan must accord with the measures set out in the operational workers travel plan.</p>	<p>Save Honey Hill made the addition in red.</p>	<p>This change has been made and will be shown in the updated DCO submitted at Deadline 3.</p>
<p>Decommissioning</p> <p>The undertaker must commence decommissioning no later than 3 months following the completion of commissioning or such longer date as may be agreed with the relevant planning authority. <b>Decommissioning shall be completed no later than 9 months after it has been commenced.</b></p>	<p>Save Honey Hill made the addition in red.</p>	<p>The Applicant notes that Save Honey Hill has not provided a reason for imposing this deadline .</p> <p>In any event, as set out at the response to ExQ 10.4, the precise nature of the works required for the decommissioning would be regulated by the Environmental Agency through the environmental permitting regime, and that process would be instigated through the decommissioning activities described in the decommissioning plan ((AS-051). The Applicant therefore cannot commit to a nine month period for decommissioning to complete when it involves third parties. However, the Applicant does propose that a timescale for decommissioning is set out in the detailed decommissioning plan (secured through Requirement 9) and has amended the DCO to this effect. This change will be seen in the updated DCO submitted at Deadline 3.</p>
<p><b>Carbon management plan</b></p> <p>20. —(1)<del>Construction of t</del>The gas recovery plant forming Work No. 9 is not to be <del>commenced operated or come into use or operated</del> until a detailed carbon management plan has been submitted to and agreed in writing by the relevant planning authority.</p> <p>(2) The detailed carbon management plan submitted for approval must accord with the measures set out in the outline carbon management plan and must detail how the operation of the authorised development</p>	<p>Save Honey Hill made the changes shown in red.</p>	<p>The Applicant does not propose to make this change. The carbon management plan concerns the operation of the authorised development. With regards to carbon performance, this will be addressed through Requirement 7 and compliance with the design code.</p> <p>As to the change at (4), the Applicant made this change in the draft DCO submitted at Deadline 1.</p>



<p>achieves carbon net zero, <u>as set out in that outline carbon management plan or elsewhere in the Order.</u></p> <p>(3) The detailed carbon management plan may be revised from time to time in accordance with requirement 6.</p> <p>(4) The authorised development must be operated in accordance with the <u>approved</u> detailed carbon management plan.</p>		
<p><b>Discovery centre operation</b></p> <p>22.—(1) Prior to the operation of the discovery centre in the gateway building, a scheme must be submitted to and approved by the relevant planning authority.</p> <p>(2) The scheme submitted pursuant to paragraph (1) above must detail how the discovery centre will operate incorporating <u>operating</u> measures for—</p> <ol style="list-style-type: none"> <li>a. attendance by appointment only;</li> <li>b. an education programme;</li> <li>c. scheduled opportunities for local schools and groups.</li> </ol> <p>(3)The discovery centre must be operated in accordance with the approved scheme.</p>	<p>Save Honey Hill made the changes shown in red.</p>	<p>The Applicant does not consider these additions necessary. The wording of the requirement makes clear that the purpose of the scheme is to regulate the operation of the discovery centre as follows:</p> <ul style="list-style-type: none"> <li>- sub-paragraph (1) ((which is sub-paragraph (2) in the DCO) states that the scheme must detail how the centre will operate;-</li> <li>- the measures in sub-paragraph (1) are clearly measures relevant to the operation of the centre only;</li> <li>- sub-paragraph (2) ((3) in the DCO) confirms that the centre must be 'operated' in accordance with the approved scheme.</li> </ul> <p>If Save Honey Hill considers the wording to be unclear, the Applicant asks that this is explained.</p>

**Applicant's Response to Save Honey Hill's Request to Applicant for Amendments and Clarifications to Draft DCO and Plans as introduced at ISH1.**

Item No.	Draft DCO and/or Plans Reference	Amendment or Clarification Requested and Reason	Applicant's Response
1.	Works Plans and Design Plans	For clarity, Works Plans should be divided into two sets showing permanent finished works and temporary construction works.	<p>The Applicant does not propose to amend the Works Plans to show this. The purpose of the Works Plans is to show the spatial extent of each work package as described in Schedule 1 of the dDCO. Where a work is temporary, it is prefixed with the word 'temporary', for example, Work No. 25 is entitled 'temporary working area compound'.</p> <p>Further, the Works Plans have been prepared in accordance with the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009.</p> <p>Finally, the Applicant has followed the Planning Inspectorate's Advice Note Six on the preparation of application documents, for example:</p> <ul style="list-style-type: none"> <li>- Any plans, drawings or cross sections provided in the application should be consistent with the requirements set out in The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ie no larger than A0 size, showing the direction of North and for onshore development drawn to an identified scale no smaller than 1:2500;</li> <li>- A scale bar should also be included on each plan in order to prevent any ambiguity when dimensions or distances</li> </ul>

Item No.	Draft DCO and/or Plans Reference	Amendment or Clarification Requested and Reason	Applicant's Response
			are measured on any copies of the plans, or electronically.
		Labels used for works should be same for Works in Schedule 1, Schedule 14 and on Works and Design Plans. Not consistent at present. Precedent for this is HS2 Phase 1 and 2a CT-05 and 06 plans. Design Plans should reference Works to which they relate.	<p>The Works Plans are labelled with the Work Nos. as per Schedule 1 of the DCO. In any event, it is not possible to include the Schedule 1 headings in the legend.</p> <p>The Applicant reiterates that Design Plans have been prepared in accordance with Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. Their purpose is not to show the works packages but to show detailed design of the various buildings and structures.</p> <p>The purpose of Schedule 14 is to set out the parameters for various structures and elements of the authorised development and not the parameters of specific Work Nos. These parts of the authorised development may be contained in multiple work packages or form part of the 'Further Works'.</p>
		Titles of Design Plans should be consistent with what they show. Multi sheet plans for linear works should have cut-off lines.	<p>The Applicant is content that the Design Plans are appropriately named. Each series of Design Plans has a title with each plan individually named therein.</p> <p>The plans will have been reviewed by the Planning Inspectorate as part of the pre-application review and prior to acceptance of the application and no issues were raised.</p>
		For all linear works, centre line(s), termination points and intermediate shafts from Preliminary Design/Design Plans should be shown on Works	All plans have been prepared in accordance with the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations

Item No.	Draft DCO and/or Plans Reference	Amendment or Clarification Requested and Reason	Applicant's Response
		Plans and relevant vertical parameters on sections eg invert levels/road surface levels. This should include, for example, Work 2	<p>2009 and the Applicant does not consider it necessary to amend these. The Applicant reiterates that the plans have been reviewed by PINS and were accepted as part of the acceptance of the application.</p> <p>In relation to the reference to HS2, the authorised development is of an entirely different nature to railway infrastructure (particularly in relation to a scheme which was consented by way of a hybrid bill and not a DCO) and therefore it is not appropriate to draw comparisons.</p>
<b>2</b>	<b>Article 6</b>	In Article 6 or elsewhere, it should be stated within what limits laterally each defined work is to be located. This is relevant to all works whether or not the DCO sets specific parameters and powers to deviate. The intention is, presumably, to limit each work to within the relevant shaded land area on the Works Plans.	Article 6 must be read alongside the Works Plans. Each work detailed in Article 6 is shown on the Works Plans and unless a limit of deviation is described in Article 6 all works must be constructed within the corresponding area for that Work No shown on the Works Plans.

Item No.	Draft DCO and/or Plans Reference	Amendment or Clarification Requested and Reason	Applicant's Response
		<p>It is not clear if the full extent of both lateral and vertical deviation for works has been assessed in the ES. For example, how have construction works areas/compounds the location of which is not defined in Schedule 14 been assessed? The ES describes the concept of 'maximum design scenarios' in Chapter 5, but this is not carried through clearly for each topic, where there are ambiguous or no statements made e.g. in relation to heights of buildings assessed and no clear statements about lateral deviation within the limits intended.</p>	<p>The Applicant refers to its response to the written representation of Save Honey Hill (Document reference EP1-078), namely paragraph 3.4.9 which states:</p> <p><i>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".</i></p> <p><i>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.</i></p> <p><i>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</i></p> <p>In relation to the specific example raised, the Applicant refers to section 3.5 of Chapter 2 of the ES (Project Description) [REP1-021]:</p> <p><i>Para 3.5.4 states : The locations of compounds are shown in the General Arrangement Plans (App Doc Ref 4.2). There is one compound located at the Waterbeach end of the Waterbeach pipeline, this will be a maximum of 100m x 100m. These locations are fixed with the exception of the smaller Waterbeach laydown areas. These laydown areas will be required along the route of the new rising main, located</i></p>

Item No.	Draft DCO and/or Plans Reference	Amendment or Clarification Requested and Reason	Applicant's Response
			<p><i>approximately every 1km within the construction corridor which will be used to store sections of the pipeline whilst the construction takes place. Each laydown area is expected to be a maximum of 20m x 80m and will move with the construction team as the pipeline progresses along the route.</i></p> <p>The assessment has considered those locations indicated on the General Arrangement Plans (App Doc Ref 4.2). The exception being Waterbeach General Arrangement Plan sheet 10 which does not indicate a compound location - the worst case considered in the ES assumes the compound located as close as possible to existing housing.</p> <p>Table 3-2 in the ES sets out the relevant parameters which correspond to the those in Part 19 of Schedule 14 to the dDCO.</p> <p>Compounds are assumed to be single storey with lighting columns to a maximum height of 8m (see CoCP Part A 5.9.4). The exception is the enabling works compound which will be up to 12m in height as noted in table 2-6 of Chapter 13 of the ES [REP1-023]</p>
<b>3</b>	<b>Article 6(b)</b>	A general power to deviate laterally of 50 metres is too large for the larger structures involved, even if bounded by overall inner boundary of Work 15. We doubt that the effects of the worst cases of such deviations have been assessed in the ES. Is it the intention that for eg the Gateway building, it could be expanded in all three dimensions as allowed to limits shown for deviation on Works Plans and Design Plans?	<p>The Applicant has considered this but is content that Article 6 is appropriately drafted. The Applicant confirms that the worst case effects of such deviations have been assessed and that the limits of deviation align with the conclusions in the ES as stated above.</p> <p>For any work with Work No. 15, Article 6 provides that, subject to the extent of the limits of deviation for those works shown on the works plans, the work can deviate laterally by 50 metres in any direction from the lines, situations</p>

Item No.	Draft DCO and/or Plans Reference	Amendment or Clarification Requested and Reason	Applicant's Response
			<p>or positioning of those works shown or indicated on the works plans. This refers to the position and the maximum parameters are those set out in Schedule 14 (parameters) of the Order and secured by requirement 4 in Schedule 2. For the gateway building, the maximum area is 58.2m x 17.1m and the maximum height is 18.5m AOD (9m above FGL) and piled foundations to a depth of -15.5m AOD (25m below FGL).</p>
4.	<b>Article 6(c)</b>	<p>As discussed at ISH 1, upward deviations of Works 31, 33, 35 and 36 by 2 metres will bring pipe/tunnels and vents above existing ground levels in places and/or reduce soil cover for agricultural use unacceptably. Any upward deviation of Work 32 from designed level beyond say 200mm will radically change visual etc impacts of that structure and no upward deviation has been assessed explicitly in the ES.</p>	<p>The Applicant amended Article 6 at Deadline 2 with the addition of the wording below and considers that this should address the concern raised by Save Honey Hill. The Applicant confirms that the effect of these changes is that the pipelines cannot go above ground level. For the avoidance of doubt, this has never been the Applicant's intention.</p> <p><i>(d) in respect of Work Nos. 31, 33 and 35 deviate vertically from the levels of those parts of the authorised development shown on the relevant sections to any extent—</i></p> <p><i>(i) not exceeding 2 metres upwards but not less than 1 metre below finished ground level excluding air valves, chambers and manholes which will be at finished ground level; or</i></p> <p><i>(ii) downwards as may be found to be necessary or convenient;</i></p> <p><i>(e) in respect of Work No. 36 outside of the boundary of the existing Cambridge Waste Water Treatment Works deviate vertically from the levels of that part of the authorised development shown on the relevant sections to any extent—</i></p>

Item No.	Draft DCO and/or Plans Reference	Amendment or Clarification Requested and Reason	Applicant's Response
			<p><i>(i) not exceeding 2 metres upwards but not less than 1 metre below finished ground level excluding air valves, chambers and manholes which will be at finished ground level; or (ii) downwards as may be found to be necessary or convenient;</i></p> <p><i>(f) in respect of Work No. 36 inside of the boundary of the existing Cambridge Waste Water Treatment Works deviate vertically from the levels of that part of the authorised development shown on the relevant sections to any extent—</i></p> <p><i>(i) not exceeding 2 metres upwards; or</i></p> <p><i>(ii) downwards as may be found to be necessary or convenient; and</i></p> <p><i>(g) in respect of Work No. 32 deviate vertically from the levels shown on the relevant sections to any extent— (i) not exceeding 0.5 metres upwards; or (ii) downwards as may be found to be necessary or convenient</i></p>
5.	<b>Schedule 1</b>	Can these Works titles be used also in Schedule 14 and on Works Plans? May need other consequential amendments to dDCO	The Applicant has considered making this amendment to Schedule 14 but some of the parameters relate to structures to be constructed as part of or across multiple work numbers or are "further works" as described in Schedule 1 of the dDCO and therefore it is appropriate to make this amendment. The Applicant would also note that the provisions of requirements 4 and 7 need to be read together with Schedule 14 and together provide a mechanism to ensure that the detailed design accords with the parameters set out in Schedule 14 as assessed in the ES.



Item No.	Draft DCO and/or Plans Reference	Amendment or Clarification Requested and Reason	Applicant's Response
		<p>Work 5 and 9. Am not aware that alignment or location of these connections to national networks are indicated as a corridor within land limits nor that any provisions are made for connections to be constructed within or beyond Order limits. This is of particular concern if new works or reinforcements to electricity or gas delivery networks are required outside DCO limits.</p>	<p>The Applicant confirms that the connections are not shown as these will be installed by the statutory undertakers under their statutory powers and therefore such works do not form part of the DCO.</p>
		<p>Work 15. Retitle Circular Enclosing Earthwork. Should describe this more fully eg a circular/annular earthwork comprising sub soil and topsoil encircling Works x to y. Describe where solar panels might be installed. Is the security fencing referred to, the only security fencing to be provided on site?</p>	<p>The Applicant considers that the current name of Work No. 15 is appropriate and therefore does not propose to change this. This would have a knock on impact to the works plans and all other documents which reference this work number and its name.</p> <p>The location and detail of the solar panels within Work Nos 15 is shown in the Design and Access Statement at pages 117 and 119. Such details will be secured through Requirement 8 as part of the 'external appearance of any plant and buildings'.</p> <p>As for security fencing, this is mentioned in several Work Nos.</p>
		<p>Work 31. Should describe the sectional dimensions of these pipes.</p>	<p>The Applicant is not clear on what is meant by sectional dimensions but should this be a reference to diameter or other measurements, the Applicant confirms that details can be found on the Design Plans – Outfall and Effluent Storm Pipeline Plans (Document series 4.13).</p> <p>It would not be appropriate to refer to measurements within Schedule 1, the purpose of</p>

Item No.	Draft DCO and/or Plans Reference	Amendment or Clarification Requested and Reason	Applicant's Response
			<p>which is to describe the elements of the various work packages.</p> <p>All design plans have been prepared in accordance with Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 Regulation 5(2)(i) and form part of the "any other plans, drawings and sections necessary to describe the proposals for which development consent is sought, showing details of design, external appearance, and the preferred layout of buildings or structures, drainage, surface water management, means of vehicular and pedestrian access, any car parking to be provided, and means of landscaping;"</p>
		<p>Work 33. Should reference sectional dimensions of pipes and sleeves. 33(a). HDD is to be used at other locations not listed, see design plans. Drafting convoluted. CoCP will apply generally so should not be stated. Can be reworded to refer only once to HDD.</p>	<p>The Applicant is not clear on what is meant by sectional dimensions but should this be a reference to diameter or other measurements, this detail can be found on the Design Plans – Waterbeach Pipeline Long Sections (Document series 4.14).</p> <p>As above, it would not be appropriate to refer to measurements within Schedule 1, the purpose of which is to describe the elements of the various work packages.</p> <p>In relation to the reference to 'in accordance with the code of construction practice', this wording has been deleted from Work No. 33.</p>
		<p>Work 35. Should reference sectional dimensions of pipes and sleeves. Reference to Waterbeach New Town not correct, since pipeline will carry all Waterbeach drainage. Need to define location of this</p>	<p>The description of Work No. 35 does not define the location of the work as this is shown on the corresponding Works Plans.</p>

Item No.	Draft DCO and/or Plans Reference	Amendment or Clarification Requested and Reason	Applicant's Response
		work. Should reference sectional dimensions of pipes and sleeves.	<p>Work No 35 does not state that the pipeline will only carry Waterbeach New Town waste water. Rather it specifies that it will connect to infrastructure to be provided as part of the Waterbeach New Town development. The Applicant acknowledges that it will carry waste water from the Waterbeach catchment.</p> <p>The Applicant refers Save Honey Hill to Waterbeach Pipeline Long Sections (Document series 4.14) for details of measurements.</p>
		Are there any crossings on alignment of Work 35?	The Applicant confirms that there will be no crossing of existing infrastructure
		Work 36. Same drafting point as 33(a). Should reference sectional dimensions of pipes and sleeves	<p>The Applicant is not clear on what is meant by sectional dimensions but should this be a reference to diameter or other measurements, this detail can be found on the Design Plans – Waterbeach Pipeline Long Sections (Document series 4.14).</p> <p>The Applicant reiterates that it would not be appropriate to refer to measurements within Schedule 1, the purpose of which is to describe the elements of the various work packages.</p>
		Further works (5). Is the outfall and redundant pipes etc to be removed on land outside that to be handed over for redevelopment as part of NECAAP?	The Applicant confirms that it is not removing such pipes and these works do not form part of the DCO. The removal of these pipes, if required, will need to be dealt with as part of the redevelopment.

Item No.	Draft DCO and/or Plans Reference	Amendment or Clarification Requested and Reason	Applicant's Response
6	Schedule 2	<p>Will provide a further list of amendments to be requested once points made in this schedule in relation to limits and parameters addressed. Am also aware that local authorities are seeking changes eg to relevant planning authority and that ExA has raised a number of queries.</p> <p>Not satisfied that the design principles/objectives from Section 11 of DAS or the landscape design concepts set out variously in the LERMP are sufficiently exact to ensure that there is a clear benchmark for detailed designs and approvals. More detailed design standards/objectives and benchmark landscape designs need to be tied into Requirements/presented to the ExA</p>	<p>With a scheme of this size and nature, it is not possible to provide 'exact' details and for this reason, the Applicant has prepared the DAS which sets out design objectives and design principles.</p> <p>Adherence to the design objectives is secured via Requirement 7 which provides that</p> <p><i>(2) The details submitted must include an explanation of how they accord with the <u>design objectives</u> set out in section 11 of the design and access statement or an explanation of why this is not reasonably practicable.</i></p> <p>Further detail will therefore be approved via Requirement 7.</p> <p>The Applicant also points out that approval of the details is in the gift of the 'relevant planning authority' and that the Applicant must secure this approval before it can commence any phase of the development.</p> <p>There is precedent for this approach in The Northampton Gateway Rail Freight Interchange Order 2019 (Schedule 2, Requirement 8) and The East Midlands Gateway Rail Freight Interchange and Highway Order 2016 (Schedule 2, Requirement 6), amongst others.</p> <p>As for the LERMP, this is, in all but name, an outline document and is not intended to cover all details required for the development. The detail will come via the approval of the detailed LERMP on a phase by phase basis. Again, approval of</p>

Item No.	Draft DCO and/or Plans Reference	Amendment or Clarification Requested and Reason	Applicant's Response
			<p>the detailed LERMP is a matter for the relevant planning authority.</p> <p>Pursuant to Paragraph 2 of Part 2 of Schedule 2, if the relevant planning authority is not satisfied with the level of detail provided, it may request further information.</p>
<b>7</b>	<b>Schedule 14 and Requirement 4</b>	Can each Part be titled as per Schedule 1, the relevant works number added and reordered in Works number order?	As above, the Applicant has not made this change.
		Label to what is generally column (2) varies from maximum parameter to maximum design parameter eg Part 2 and 3, for no good reason. Should be max design parameter.	The Applicant confirms that 'maximum parameter' and 'maximum design parameter' are intended to have the same meaning. The Applicant has therefore changed all references to 'maximum parameter' to 'maximum design parameter'
		Part 2. Stormwater capacity to be 'no less than x m3' is not a maximum parameter.	The Applicant notes this point but the stormwater capacity is referenced as a minimum as this is the minimum storage volume which is required to avoid the potential for other environmental impacts arising as a result of inadequate storm water storage. The maximum storage capacity is defined by the parameters for the physical sizing of the storm tanks.
		Part 11 Defining a single maximum height for overall footprint of digestion plant area makes no sense, since other max heights are higher than this.	<p>The Applicant has reconsidered this drafting and notes that the overall footprint of the digestion plant area should be 30.4m AOD (21.4m above FGL). This change has been in the DCO and will be submitted at Deadline 3.</p> <p>For the avoidance of doubt, the total area is the maximum area in which the digesters may be</p>

Item No.	Draft DCO and/or Plans Reference	Amendment or Clarification Requested and Reason	Applicant's Response
			located. The total height is then the height of the highest structure therein.
		Part 13 Similar point to Part 11. Max height parameter not relevant to area. If meant to apply to 'any other structure' needs a separate row in schedule.	The Applicant has included this as a parameter to make clear that notwithstanding the maximum total area, the overall height must still not exceed 18m AOD.
		Part 14 Total area cannot have a 3 dimensional set of parameters. Height parameter is that of scrubbing columns so is already specified.	<p>The Applicant has amended this drafting so it is now shown as total area – 50m x 50m and total height – 27m AOD.</p> <p>The total height is the height of the highest structure therein which is the stripping/scrubbing columns.</p> <p>The Applicant included this as a parameter to make clear that notwithstanding the maximum total area, the overall height must still not exceed 18m above FGL.</p>
		Part 15, 16 Have maximum heights been set based on dispersion modelling of flue gases?	The Applicant confirms that the heights of stacks align with assessment as carried out for dispersion modelling of flue gases.
<b>8.</b>	<b>Article 23</b>	Article 23(1) needs to add 'subject to/save as in Article 23(4)'	<p>The Applicant does not agree that this change is necessary as Article 23(1) concerns the felling or lopping of trees and shrubs, the details of which are not specified, save that they must be 'near' any part of the development. Article 23(4) concerns the removal of hedgerows which are specified in Schedule 16.</p> <p>The Applicant may need to fell or lop a tree or shrub which forms part of a hedgerow and not go</p>

Item No.	Draft DCO and/or Plans Reference	Amendment or Clarification Requested and Reason	Applicant's Response
			as far as removal. For this reason, the Applicant proposes to retain the Article as drafted.
		Article 23(4) needs to reflect commitments given on Hedgerow Plans and in ES. These are that only hedgerows shown in Schedule 16 and on plans are to be removed and that all other hedgerows including those shown on Plans as to be retained are not removed.	<p>The Applicant is satisfied that the operation of Article 23(4) is such that only specified hedgerows will be removed.</p> <p>The Applicant's power is limited to the removal of the hedgerows detailed in Schedule 16 and shown on the hedgerow regulations and tree preservation plans.</p>
		Plans are incomplete as regards hedgerows within limits to be retained contrary to what is stated on eg. Plan 4.8.9, where there are significant hedges within limits which must be retained.	<p>The purpose of the hedgerow regulations and tree preservation plans is to mark the hedgerows to be removed only. This is shown by an orange line between points labelled with a 'H'.</p> <p>The Applicant does not propose to show hedgerows which are to be retained as this is not relevant to the exercise of the power in Article 23(4).</p>
		Also want a commitment that mature trees (to be defined) within limits are not to be felled or removed although may be lopped etc if necessary. Prefer this to cover all trees or otherwise must map/schedule trees to be retained.	<p>The Applicant may consider it 'reasonably necessary' to remove any tree, regardless of age, if required for the development (noting the constraints in this Article as detailed above). However, the Applicant confirms its intention to try and retain trees, wherever possible. The power provided in Article 23 is a fallback, only to be used where needed in accordance with the controls in the Article.</p> <p>The Applicant also refers Save Honey Hill to the Code of Construction Practice Part A and in particular, paragraphs 7.2.63 to 7.2.70.</p>

Item No.	Draft DCO and/or Plans Reference	Amendment or Clarification Requested and Reason	Applicant's Response
		<p>Article 23(4) needs amending to refer to Hedgerow Plans and to change second 'removed' in (b) to say 'required'.</p> <p>Needs new 23(5) along the lines of 'The undertaker shall not (a) remove hedgerows shown to be retained on Plans and (b) remove mature trees as specified in Schedule 16 Part 3 [to be drawn up] or remove any mature trees shown on Plans within limits [mature to be defined]'</p> <p>These changes essential to give effect to intentions/assessment in ES.</p>	<p>Compliance with the CoCP is secured by Requirement 8.</p> <p>The Applicant does not consider it necessary to refer to the hedgerow and tree preservation plans in the Article as the Article refers to Schedule 16. Schedule 16 then refers to the relevant plans and the location of the hedgerows.</p> <p>The Applicant agrees that the word 'removed' in Article 23(4)(b) needed changing to 'required' made this change as shown below in the DCO submitted at Deadline 1:</p> <p><i>remove the important hedgerows as specified in Part 2 of Schedule 16 (removal of important hedgerows) that may be <del>removed</del> required for the purposes of carrying out the authorised development.</i></p> <p>The Applicant does not consider it necessary to add the suggested wording. As to (a), the Applicant will not have the power to remove any hedgerows which are not detailed in Schedule 16.</p> <p>As to (b), the Applicant refers to the response concerning mature trees above.</p> <p>The Applicant also refers to the safeguards within the CoCP as set out elsewhere in this response.</p>
9	<b>Articles 24 and 25</b>	Should delete 'fell or' in each article	The Applicant does not agree to this amendment which would have the effect of limiting the Applicant's power to lopping or cutting back roots of trees and shrubs subject to a tree preservation order or within a conservation area. These actions may not be sufficient to prevent



Item No.	Draft DCO and/or Plans Reference	Amendment or Clarification Requested and Reason	Applicant's Response
			<p>obstruction or interference with the proposed development.</p> <p>The Applicant points out that it's proposed powers under these Articles are limited as follows:</p> <ul style="list-style-type: none"> <li>- before felling, lopping or cutting back roots it must <u>reasonably believe</u> it to be necessary to do so; and</li> <li>- that belief must be held for the purposes of construction, operation, use or maintenance of the development or any apparatus used in connection with the authorised development.</li> </ul> <p>The Applicant must exercise this power with care due to the obligation not to do any unnecessary damage to the trees or shrubs and the potential liability for compensation for loss or damage.</p>
<b>10</b>	<b>Article 35</b>	<p>As stated at ISH1, this article is insufficiently precise as regards requirements on the undertaker to restore land taken temporarily and to make any other reinstatements.</p> <p>Recognise that these are standard articles from previous orders and Acts. Solution is for Applicant to devise a Land Restoration and Reinstatement Policy detailing what is a minimum commitment on these matters eg land levels/soil quality/repair of drains/replanting of hedges removed/removal of road improvements and ground strengthening</p>	<p>The Applicant is unclear whether Save Honey Hill represent any landowners or occupiers who are proposed to be subject to the powers of temporary possession. Its standing to make general comments on compulsory acquisition and/or temporary possession matters without reference to the proposed impact for specific Affected Persons is therefore questionable.</p> <p>In any event, the Applicant does not consider it to be necessary or appropriate to add detail regarding land reinstatement proposals into Article 35.</p> <p>Article 35(5) requires the Applicant to restore the land to the reasonable satisfaction of the owner,</p>

Item No.	Draft DCO and/or Plans Reference	Amendment or Clarification Requested and Reason	Applicant's Response
		<p>(unless agreed otherwise with landowner)/replacement of fencing etc.</p> <p>This is to give effect to the intentions of the assessment in the ES and to ensure that necessary environmental mitigation is provided eg alongside footpaths etc or here landowner not bothered.</p> <p>Article 35(2) Notice period of 14 days is too short to be reasonable and has led to endless trouble and ill will from landowners/occupiers during the implementation of other Orders and HS2 Acts.</p>	<p>which will necessarily have regard to the original nature and use of the particular landholding, the works undertaken, and the condition of the land once the relevant temporary use of the land has ceased.</p> <p>The Applicant has set out a number of measures regarding land reinstatement in the CoCP Part A (App Doc Ref 5.4.2.1) [<b>APP-068</b>] and ES Appendix 6.3 Outline Soil Management Plan (App Doc Ref 5.4.6.3) [<b>AS-060</b>]. Furthermore, as identified in the Applicant's response to ExQ 3.3, the Applicant proposed to update the CoCP Part A to provide further detail on land restoration measures. This was provided at Deadline 2 (reference REP1-025).</p> <p>With regards to the period of notice in advance of the exercise of temporary possession powers, the Applicant notes that the 14 day period is consistent with many orders, including the Sizewell C (Nuclear Generating Station) Order 2022 and the Boston Alternative Energy Facility Order 2023. However, the Applicant notes that 28 days' notice has commonly been authorised in recent orders (such as The Hornsea Four Offshore Wind Farm Order 2023, the Longfield Solar Farm Order 2023 and Keadby 3 (Carbon Capture Equipped Gas Fired Generating Station) Order 2022. The Applicant confirms that it will amend the notice period in Article 35(2) to 28 days in line with those orders.</p>

## Get in touch

You can contact us by:



Emailing at [info@cwwtpr.com](mailto:info@cwwtpr.com)



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



Writing to us at **Freepost: CWWTPR**

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

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

Cambridge Waste Water Treatment Plant Relocation Project  
Anglian Water Services Limited

# Applicant's comments on South Cambridgeshire District Council's Deadline 2 submissions

Application Document Reference: 8.15

PINS Project Reference: WW010003

APFP Regulation No. n/a

## Document Control

<b>Document title</b>	Applicant's comments on South Cambridgeshire District Council Deadline 2 submissions
<b>Version No.</b>	01
<b>Date Approved</b>	18/12/23
<b>Date 1<sup>st</sup> Issued</b>	18/12/23

## Version History

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Description of change</b>
01	18/12/23	-	Submitted to the ExA at Deadline 3

## Contents

<b>1. Introduction .....</b>	<b>1</b>
1.1 Introduction.....	1
<b>2. Applicant's comments on submissions received at Deadline 2 .....</b>	<b>2</b>
2.1. South Cambridgeshire District Council – Revised Local Impact Report [REP2-052] ...	2
2.2. South Cambridgeshire District Council - Responses to the Examining Authority's written questions and requests for information (ExQ1) combined [REP2-054].....	4
2.3. South Cambridgeshire District Council - Comments on Save Honey Hill's Written Representations [REP2-051] .....	4
2.4. South Cambridgeshire District Council comments on the Applicant's responses to the Examining Authority's First Written Questions (ExQ1) [REP2-050] .....	6

# 1. Introduction

## 1.1 Introduction

1.1.1 This document provides Anglian Water Services Limited's (the Applicant's) comments on submissions received at Deadline 2 from South Cambridgeshire District Council for the Cambridge Waste Water Treatment Plant Relocation Project (CWWTPRP).

1.1.2 This document does not seek to respond to every submission made at Deadline 2 (6th December 2023) or to repeat matters which are already set out in documents available to the examination – rather its purpose is to address any new concerns which may have arisen, correct any omissions or provide signposting of clarification where deemed necessary.

1.1.3 The Applicant has responded to the following items submitted at Deadline 2:

- Amendments to South Cambridgeshire District Council Local Impact Report [REP2-052];
- Responses to the Examining Authority's written questions and requests for information (ExQ1) combined [REP2-054];
- South Cambridgeshire District Council comments on Save Honey Hill's Written Representations [REP2-051];
- South Cambridgeshire District Council comments on the Applicants responses to the Examining Authority's First Written Questions (ExQ1) [REP2-050].

## 2. Applicant's comments on submissions received at Deadline 2

### 2.1. South Cambridgeshire District Council – Revised Local Impact Report [REP2-052]

- 2.1.1. The District Council has submitted a revised Local Impact Report (LIR) which includes reference to an Addendum Report – Updated odour dispersion modelling for Cambridge Water Recycling Centre December 2020 (which is added to Appendix 1: Evidence Library [Appendix 1, GCSP-20a]). Based on this updated odour dispersion modelling, the Council have amended the text at paragraphs 6.34 - 6.35 of their LIR to refer to the potential for a greater number of dwellings (at best 1,425 dwellings as against their original estimate of 325 dwellings) that the Council states could be delivered outside the odour contours (but not the 400m Safeguarding Zone), based on the North East Cambridge Area Action Plan, in the event that the Proposed Development is not granted development consent and the existing WWTP remains in situ.
- 2.1.2. The Applicant would point out that neither the 2018 Odournet report nor the Olfasense UK Addendum Report containing Map 1 referred to by the Council have been agreed with or accepted by the Applicant who, at the time of their production, raised various concerns about the methodology used in the modelling. As acknowledged by the Council at paragraph 6.34 of the Council's revised LIR, the contours threshold used in the modelling is 3 ouE/m<sup>3</sup> – 10 ouE/m<sup>3</sup>. Since residential development would represent a vulnerable development (high sensitivity receptors to odour exposure), the Applicant considers that the most stringent Institute of Air Quality Management (IAQM) Guidance on the assessment of odour for planning 2018 criteria (C98, 1-hour = 1.5 ouE/m<sup>3</sup>) should be used as the precautionary standard at planning stage to estimate the potential odour impacts. This is the measure used in the Applicant's odour impact assessment for the Proposed Development. Use of the 1.5 ouE/m<sup>3</sup> threshold would show a wider odour contour area than that presented on Map 1 on page 23 of the Council's revised LIR. Whilst, therefore, the Council recognises that "*under either scenario [of Odournet/Olfasense UK's modelling], the majority of the NEC area where residential development is envisaged in the NECAAP lies within the odour contours*", the Applicant does not accept or agree that the figure of at best 1,425 dwellings is accurate or reliable for comparison purposes.
- 2.1.3. The Applicant uses the expression 'at best' (a) because of the qualifications highlighted by the Council to the delivery of estimated homes on the 3 sites (at paragraph 6.35) and (b) because of the considerable (we say) uncertainty whether those landowners would continue to support residential development in favour of other more suitable uses such as office and laboratory space in the absence of the regeneration of the wider NEC area and the provision of a higher quality environment (also recognised by the Council comment at paragraph 6.99 of their revised LIR).
- 2.1.4. Even if the ExA were to take the figure of 1,425 dwellings, however, this would represent no more than 17% of the total housing proposed in the NECAAP for the NEC area which could otherwise be delivered if the Proposed Development is granted consent. Alternative use of the areas identified for the other 6,925 homes which could not otherwise be delivered



because of the retention of the existing WWTP would largely be restricted to employment and commercial development (as recognised by the Council at paragraph 6.99 of their revised LIR). This would likely be of a lower quality and density than proposed through the NECAAP, recognizing the surrounding context and the need to achieve a suitable level of amenity in the vicinity of ongoing waste water treatment plant operations. Few if any of the wider regeneration benefits would likely be realised, including particularly the key NEC vision to create a new high quality mixed-use city district co-locating employment and residential development. In the absence of the quantity of new housing envisaged in the NECAAP, the Applicant considers that NEC would continue to be a commuter destination constrained by the recognised traffic capacity issues around junction 33 A14/Milton Road and with the need for the Council to identify alternative less sustainable sites to accommodate the homes which could not otherwise be delivered within NEC.

### Supplementary Applicant responses on the LIR

2.1.5. In the Applicant's Comments on Local Impact Reports (App Doc Ref 8.11) [REP2-036], the Applicant confirmed in response to paragraph 8.21 SCDC's Local Impact Report [REP1-139] that a table providing the heights of structures within the Proposed WWTP would be provided, giving heights in both metres above finished ground level (AFGL) and above ordnance datum (AOD). This table is provided below.

	Height in metres above finished ground level (AFGL)	Height in metres above ordnance datum (AOD)
Sludge Thickening Building and Blending Tank	10m AFGL	19m
Odour Control Unit Vent Stack	16m AFGL	25m
Filtration Plant	10m AFGL	19.5m
Digesters	21.5m AFGL	30.4m
Heating, Pasteurisation and Hydrolysis Tanks	15m AFGL	24m
Cake Storage Barn	9m AFGL	18m
Liquor Treatment Plant	9m AFGL	18m
Nutrient Recovery Tower	18m AFGL	25m
Biogas Holder	16m AFGL	29m
Biogas Flare Stack	15m AFGL	24m
Biogas Upgrading Plant	12m AFGL	21
Boiler Building	8.5m AFGL	17.5m
Boiler Stack	2m diameter and 24m AFGL	33m
Gateway Building	Approximately 9m AFGL	18.5m
Workshop	Approximately 10m AFGL	19.5

2.1.6. The Applicant confirms that the wording used in Table 2-6 that stated "taking into account a tolerance of up to 2m" was included in error and should be deleted. The Applicant will include the deletion of this within the next iteration of the Environmental Statement Errata.

## 2.2. South Cambridgeshire District Council - Responses to the Examining Authority's written questions and requests for information (ExQ1) combined [REP2-054]

2.2.1. Map 1 from the Addendum Report – Updated odour dispersion modelling for Cambridge Water Recycling Centre December 2020 (added to Appendix 1: Evidence Library [Appendix 1, GCSP-20a]) is also appended to the Council's Responses to the Examining Authority's written questions and requests for information (ExQ1) [REP2-054]. For the reasons stated above, the Applicant does not accept or agree that the figure of 1,425 dwellings referred to in the Council's revised response to ExQ1-2.13(k) is accurate or reliable for comparison purposes.

## 2.3. South Cambridgeshire District Council - Comments on Save Honey Hill's Written Representations [REP2-051]

2.3.1. The District Council has submitted comments [REP2-051] on the Written Representations submitted by Save Honey Hill at Deadline 1 [REP1-171]. The Applicant comments on these are limited to the following:

Page	Topic / Section / Para	Comment
44	Section 4.7.1 Application of Odour Safeguarding/ Encroachment Policies	The Applicant agrees with the Council's comment that Save Honey Hill's suggestion that the 400m zone is "highly precautionary" is not correct, and that the vast majority of the land proposed for housing in the NECAAP lies within the odour contour as well as the 400m buffer. The Applicant refers to its response to paragraphs 4.7.1 – 4.7.14 of Save Honey Hill's Written Representations [REP2-038] and its comments above.
46	Odour	The Applicant welcomes the clarification provided by the Council on the application and correct interpretation of Policies 11 and 16 of the Minerals and Waste Local Plan 2021. The Applicant agrees with the Council's comment that Save Honey Hill's interpretation of MWLP Policy 11 is at odds with the Agents of Change principle enshrined within the NPPF, and MWLP Policy 16 which includes a presumption against allowing sensitive receptor uses within a Consultation Area which surrounds an existing water recycling centre.
62	Section 6.3 Lack of Compliance with relevant Local Plan Policy  Paragraph 6.3.4	The Applicant agrees with the District Council's comments: <ul style="list-style-type: none"> <li>- MWLP Policy 11 states "proposals for new water recycling capacity <u>or</u> proposals required for operational efficiency...will be supported in principle, particularly where it is required to meet wider growth proposals identified in the Development Plan" (CCC/SCDC emphasis)</li> </ul>

Page	Topic / Section / Para	Comment
		<p>- The policy therefore supports in principle proposals that provide for new water recycling capacity as well as schemes that promote operational efficiency. This encompasses new schemes (whether or not they involve relocation) and in particular where such schemes enable wider growth which is identified in the Development Plan.</p> <p>The Applicant welcomes the Council's comments which align with the Applicant's position. The Proposed Development will increase waste water treatment capacity, and will be capable of treating the waste water from the Waterbeach catchment and anticipated housing growth in the combined Cambridge and Waterbeach catchment area. The relocation will also enable wider growth in Greater Cambridge through the release of a major brownfield site.</p>
64	<p>6.6 The Availability of Alternative Housing Sites in the GCLP to replace any Allocation at NECAAP</p> <p>Paragraph 6.6.1</p>	<p>The Applicant agrees with the Council's comments responding to Save Honey Hill's claim that the OAN is "flawed and unachievable". The Council's comment that "The Councils have been clear that it may or may not be possible to deliver the increased needs in full (paragraph 6.73 of their LIRs [REP1-128 and REP1-139]), but that with the proposed [Fens] reservoir the Councils are confident that further sites will need to be allocated in the emerging GCLP (paragraph 6.74)" aligns with the Applicant's position. The Council's latest assessment of OAN for jobs and homes forecasts that for the period 2020 to 2041 there will be an increase from 58,400 to 66,600 jobs and consequently an increase of 44,400 to 51,724 homes needed to support these jobs. The Council confirms that NEC is the most sustainable location for strategic scale development within Greater Cambridge.</p>
65	<p>Paragraph 6.6.2, Table 2 - suggested sustainable alternatives to the NECAAP housing allocation</p>	<p>The Applicant agrees with the Council's comment that the two "suggested sustainable alternatives to the NECAAP housing allocation" referenced by Save Honey Hill at Cambourne and Cambridge Biomedical Campus (CBC) are not an accurate representation of the position. There is no evidence to support the suggested additional housing capacities at Cambourne Extension and CBC included in their Table 2 are realistic and it should not be assumed that level of homes could be identified/accommodated or would be suitable.</p>

Page	Topic / Section / Para	Comment
66-67	Paragraphs 6.6.1 to 6.6.4 Alternatives to NECAAP	<p>The Applicant agrees with the City Council's comments on Save Honey Hill's statement that sustainable alternatives to the NECAAP housing allocation "<i>can be found without the need to identify any new strategic sites, use of greenfield or Green Belt above those already in the adopted local plans or proposed in the GCLP First Proposals</i>"</p> <p>The Applicant agrees with the Council's comment that "<i>It is not realistic to consider these sites could deliver greater numbers of homes within the plan period to make up for the contribution to housing from the NEC that would be lost if the DCO were not approved</i>". This aligns with the Applicant's position. NEC has the potential to create around 8,350 homes and is a highly sustainable location for housing.</p>

## 2.4. South Cambridgeshire District Council comments on the Applicant's responses to the Examining Authority's First Written Questions (ExQ1) [REP2-050]

- 2.4.1. In respect to the Council's comments [REP2-050] on the Applicants responses to the Examining Authority's First Written Questions (ExQ1) [REP1-079], the Applicant's response is set out below.
- 2.4.2. In respect of ExQ1-14.3 Landscape and Visual, the Applicant notes the Council's comment that an RVAA would not be relevant for this development.
- 2.4.3. In respect of ExQ1-14.6 Landscape and Visual, the planting and grassland shown on the landscape masterplan in the Landscape, Ecological and Recreational Management Plan (LERMP) (App Doc Ref 5.4.8.14) [AS-066] is required to deliver a minimum of 20% biodiversity net gain (BNG) on the site of the Proposed WWTP. Paragraph 4.3.4 of the LERMP states that the elements of the Landscape Masterplan which contribute towards the 20% biodiversity net gain target set by Anglian Water Services Limited will be maintained for a minimum of 30 years, in keeping with the provisions of the Environment Act 2021. In practice, as stated above, this includes all the planting shown on the landscape masterplan. Sections 4 and 5 of the LERMP set out the management and monitoring that will be carried out over the 30 year period to enable the establishment and continued growth of the planting and seeding. Table 5.1 states that: All new tree, shrub and hedgerow planting will be monitored over 30 years and dead plants will be replaced as specified in the planting schedule. Where a single species shows consistent losses or signs of disease, the choice of species may be amended.

## Get in touch

You can contact us by:



Emailing at [info@cwwtpr.com](mailto:info@cwwtpr.com)



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



Writing to us at **Freepost: CWWTPR**

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

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

Cambridge Waste Water Treatment Plant Relocation Project  
Anglian Water Services Limited

# Applicant's comments on Cambridge City Council's Deadline 2 submissions

Application Document Reference: 8.16  
PINS Project Reference: WW010003  
APFP Regulation No. n/a

**Revision No. 01**  
18 December 2023

## Document Control

<b>Document title</b>	Applicant's comments on Cambridge City Council's Deadline 2 submissions
<b>Version No.</b>	01
<b>Date Approved</b>	18/12/23
<b>Date 1<sup>st</sup> Issued</b>	18/12/23

## Version History

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Description of change</b>
01	18/12/23	-	Submitted to the ExA at Deadline 3

## Contents

<b>1. Introduction .....</b>	<b>1</b>
1.1 Introduction.....	1
<b>2. Applicant’s Responses .....</b>	<b>2</b>
2.1. Cambridge City Council – Revised Local Impact Report [REP2-043].....	2
2.2. Cambridge City Council - Responses to the Examining Authority’s written questions and requests for information (ExQ1) combined [REP2-048] .....	3
2.3 Cambridge City Council - Comments on Save Honey Hill’s Written Representations [REP2-049].....	3



# 1. Introduction

## 1.1 Introduction

- 1.1.1 This document provides Anglian Water Services Limited (the Applicant) comments on submissions received at Deadline 2 from Cambridge City Council for the Cambridge Waste Water Treatment Plant Relocation Project (CWWTPRP).
- 1.1.2 This document does not seek to respond to every submission made at Deadline 2 (6th December 2023) or to repeat matters which are already set out in documents available to the examination – rather its purpose is to address any new concerns which may have arisen, correct any omissions or provide signposting of clarification where deemed necessary.
- 1.1.3 The Applicant has responded to the following items submitted at Deadline 2:
- Amendments to Cambridge City Council Local Impact Report [REP2-043]
  - Comments on Save Honey Hill's Written Representation [REP2-049]
  - Responses to The Examining Authority's written questions and requests for information (ExQ1) [REP2-046]
- 1.1.4 The Applicant has no comments on information received at Deadline 2 in respect to:
- Comments on the Applicants responses to the Examining Authority's First Written Questions (ExQ1) [REP2-045]

## 2. Applicant's Responses

### 2.1. Cambridge City Council – Revised Local Impact Report [REP2-043]

- 2.1.1. The City Council has submitted a revised Local Impact Report which includes reference to an Addendum Report – Updated odour dispersion modelling for Cambridge Water Recycling Centre December 2020 which is added to Appendix 1: Evidence Library [Appendix 1, GCSP-20a]. Based on this updated odour dispersion modelling, the Council have amended the text at paragraphs 6.34 - 6.35 of their LIR to refer to the potential for a greater number of dwellings (at best 1,425 dwellings as against their original estimate of 325 dwellings) that the Council states could be delivered outside the odour contours (but not the 400m Safeguarding Zone), based on the North East Cambridge Area Action Plan, in the event that the Proposed Development is not granted development consent and the existing WWTP remains in situ.
- 2.1.2. The Applicant would point out that neither the 2018 Odournet report nor the Olfasense UK Addendum Report containing Map 1 referred to by the Council have been agreed with or accepted by the Applicant who, at the time of their production, raised various concerns about the methodology used in the modelling. As acknowledged by the Council at paragraph 6.34 of the Council's revised LIR, the contours threshold used in the modelling is 3 ouE/m<sup>3</sup> – 10 ouE/m<sup>3</sup>. Since residential development would represent a vulnerable development (high sensitivity receptors to odour exposure), the Applicant considers that the most stringent Institute of Air Quality Management (IAQM) Guidance on the assessment of odour for planning 2018 criteria (C98, 1-hour = 1.5 ouE/m<sup>3</sup>) should be used as the precautionary standard at planning stage to estimate the potential odour impacts. This is the measure used in the Applicant's odour impact assessment for the Proposed Development. Use of the 1.5 ouE/m<sup>3</sup> threshold would show a wider odour contour area than that presented on Map 1 on page 23 of the Council's revised LIR. Whilst, therefore, the Council recognises that "*under either scenario [of Odournet/Olfasense UK's modelling], the majority of the NEC area where residential development is envisaged in the NECAAP lies within the odour contours*", the Applicant does not accept or agree that the figure of at best 1,425 dwellings is accurate or reliable for comparison purposes.
- 2.1.3. The Applicant uses the expression 'at best' (a) because of the qualifications highlighted by the Council to the delivery of estimated homes on the 3 sites (at paragraph 6.35) and (b) because of the considerable (we say) uncertainty whether those landowners would continue to support residential development in favour of other more suitable uses such as office and laboratory space in the absence of the regeneration of the wider NEC area and the provision of a higher quality environment (also recognised by the Council comment at paragraph 6.99 of their revised LIR).
- 2.1.4. Even were the ExA to take the figure of 1,425 dwellings, however, this would represent no more than 17% of the total housing proposed in the NECAAP for the NEC area which could otherwise be delivered if the Proposed Development is granted consent. Alternative use of areas identified for the other 6,925 homes which could not otherwise be delivered because of the retention of the existing WWTP would largely be restricted to employment and commercial development (as recognised by the Council at paragraph 6.99 of their revised LIR). This would likely be of a lower quality and density than proposed through the NECAAP, recognizing the surrounding context and the need to achieve a suitable level of

amenity in the vicinity of ongoing waste water treatment plant operations. Few if any of the wider regeneration benefits would likely be realised, including particularly the key NEC vision to create a new high quality mixed-use city district co-locating employment and residential development. In the absence of the quantity of new housing envisaged in the NECAAP, the Applicant considers that NEC would continue to be a commuter destination constrained by the recognised traffic capacity issues around junction 33 A14/Milton Road and with the need for the Council to identify alternative less sustainable sites to accommodate the homes which could not otherwise be delivered within NEC.

## 2.2. Cambridge City Council - Responses to the Examining Authority's written questions and requests for information (ExQ1) combined [REP2-048]

2.2.1. Map 1 from the Addendum Report – Updated odour dispersion modelling for Cambridge Water Recycling Centre December 2020 (added to Appendix 1: Evidence Library [Appendix 1, GCSP-20a]) is also appended to the Council's Responses to the Examining Authority's written questions and requests for information (ExQ1) [REP2-048]. For the reasons stated above, the Applicant does not accept or agree that the figure of 1,425 dwellings referred to in the Council's revised response to ExQ1-2.13(k) is accurate or reliable for comparison purposes.

## 2.3 Cambridge City Council - Comments on Save Honey Hill's Written Representations [REP2-049]

2.3.1. The City Council has submitted comments [REP2-049] on the Written Representations submitted by Save Honey Hill at Deadline 1 [REP1-171]. The Applicant's comments on these are limited to the following:

Page	Topic / Section / Para	Comments
44	Section 4.7.1 Application of Odour Safeguarding/ Encroachment Policies	The Applicant agrees with the Council's comment that Save Honey Hill's suggestion that the 400m zone is " <i>highly precautionary</i> " is not correct, and that the vast majority of the land proposed for housing in the NECAAP lies within the odour contour as well as the 400m buffer. The Applicant refers to its response to paragraphs 4.7.1 – 4.7.14 of Save Honey Hill's Written Representations [REP2-038] and its comments above.
46	Odour	The Applicant welcomes the clarification provided by the Council on the application and correct interpretation of Policies 11 and 16 of the Minerals and Waste Local Plan 2021. The Applicant agrees with the Council's comment that Save Honey Hill's interpretation of MWLP Policy 11 is at odds with the Agents of Change principle enshrined within the NPPF, and MWLP Policy 16 which includes a presumption against allowing sensitive receptor uses within a Consultation Area which surrounds an existing water recycling centre.
62	Section 6.3 Lack of Compliance with relevant Local Plan Policy	The Applicant agrees with the City Council's comments:

Page	Topic / Section / Para	Comments
	Paragraph 6.3.4	<ul style="list-style-type: none"> <li>- MWLP Policy 11 states <i>“proposals for new water recycling capacity <u>or</u> proposals required for operational efficiency...will be supported in principle, particularly where it is required to meet wider growth proposals identified in the Development Plan”</i> (CCC/SCDC emphasis)</li> <li>- The policy therefore supports in principle proposals that provide for new water recycling capacity as well as schemes that promote operational efficiency. This encompasses new schemes (whether or not they involve relocation) and in particular where such schemes enable wider growth which is identified in the Development Plan.</li> </ul> <p>The Applicant welcomes the Council's comments which align with the Applicant's position. The Proposed Development will increase waste water treatment capacity, and will be capable of treating the waste water from the Waterbeach catchment and anticipated housing growth in the combined Cambridge and Waterbeach catchment area. The relocation will also enable wider growth in Greater Cambridge through the release of a major brownfield site.</p>
64	6.6 The Availability of Alternative Housing Sites in the GCLP to replace any Allocation at NECAAP  Paragraph 6.6.1	<p>The Applicant agrees with the Council's comments responding to Save Honey Hill's claim that the OAN is <i>“flawed and unachievable”</i>. The Council's comment that <i>“The Councils have been clear that it may or may not be possible to deliver the increased needs in full (paragraph 6.73 of their LIRs [REP1-128 and REP1-139]), but that with the proposed [Fens] reservoir the Councils are confident that further sites will need to be allocated in the emerging GCLP (paragraph 6.74)”</i> aligns with the Applicant's position. The Council's latest assessment of OAN for jobs and homes forecasts that for the period 2020 to 2041 there will be an increase from 58,400 to 66,600 jobs and consequently an increase of 44,400 to 51,724 homes needed to support these jobs. The Council confirms that NEC is the most sustainable location for strategic scale development within Greater Cambridge.</p>
65	Paragraph 6.6.2, Table 2 - suggested sustainable alternatives to the NECAAP housing allocation	<p>The Applicant agrees with the Council's comment that the two <i>“suggested sustainable alternatives to the NECAAP housing allocation”</i> referenced by Save Honey Hill at Cambourne and Cambridge Biomedical Campus (CBC) are not an accurate representation of the position. There is no evidence to support the suggested additional housing capacities at Cambourne Extension and CBC included in their Table 2 are realistic and it</p>

Page	Topic / Section / Para	Comments
		<p>should not be assumed that level of homes could be identified/accommodated or would be suitable.</p>
66-67	<p>Paragraphs 6.6.1 to 6.6.4            Alternatives to NECAAP</p>	<p>The Applicant agrees with the City Council's comments on Save Honey Hill's statement that sustainable alternatives to the NECAAP housing allocation <i>"can be found without the need to identify any new strategic sites, use of greenfield or Green Belt above those already in the adopted local plans or proposed in the GCLP First Proposals"</i></p> <p>The Applicant agrees with the Council's comment that <i>"It is not realistic to consider these sites could deliver greater numbers of homes within the plan period to make up for the contribution to housing from the NEC that would be lost if the DCO were not approved"</i>. This aligns with the Applicant's position. NEC has the potential to create around 8,350 homes and is a highly sustainable location for housing.</p>

## Get in touch

You can contact us by:



Emailing at [info@cwwtpr.com](mailto:info@cwwtpr.com)



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



Writing to us at **Freepost: CWWTPR**

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

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

Cambridge Waste Water Treatment Plant Relocation Project  
Anglian Water Services Limited

# Applicant's comments on Cambridgeshire County Council's Deadline 2 submissions

Application Document Reference: 8.17

PINS Project Reference: WW010003

APFP Regulation No. n/a

## Document Control

<b>Document title</b>	Applicant's comments on Cambridgeshire County Council's Deadline 2 submissions
<b>Version No.</b>	01
<b>Date Approved</b>	18/12/23
<b>Date 1<sup>st</sup> Issued</b>	18/12/23

## Version History

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Description of change</b>
01	18/12/23	-	Submitted to the ExA at Deadline 3



## Contents

<b>1</b>	<b>Introduction .....</b>	<b>1</b>
1.1	Introduction.....	1
<b>2</b>	<b>Applicants responses to CCC's comments on ExQ1 [REP1-079] .....</b>	<b>2</b>
2.1	Biodiversity.....	2
2.2	Carbon .....	4
2.3	Draft DCO drafting.....	4
2.4	Traffic and Transport.....	5
<b>3</b>	<b>Applicants comment on CCC's comments on the Applicants Response to Relevant Representations [REP1-078] .....</b>	<b>6</b>
3.1	Carbon Emissions .....	6
3.2	Water Resources – Drainage Strategy .....	6

# 1 Introduction

## 1.1 Introduction

- 1.1.1 This document provides Anglian Water Services Limited (the Applicant) comments on submissions received at Deadline 2 from Cambridgeshire County Council (CCC) for the Cambridge Waste Water Treatment Plant Relocation Project (CWWTPRP).
- 1.1.2 This document does not seek to respond to every submission made at Deadline 2 (6<sup>th</sup> December 2023) or to repeat matters which are already set out in documents available to the examination – rather its purpose is to address any new concerns which may have arisen, correct any omissions or provide signposting of clarification where deemed necessary.
- 1.1.3 The Applicant has responded to the following items submitted at Deadline 2:
- Comments on responses to ExA's ExQ1 [**REP2-040**]; and
  - Responses to comments on Relevant Representations [**REP2-041**].

## 2 Applicants responses to CCC's comments on ExQ1 [REP1-079]

### 2.1 Biodiversity

#### **Unimproved calcareous grassland within Low Fen Drove Way Grassland and Hedges County Wildlife Site**

- 2.1.1 The Applicant notes the comments at 5.8 in relation to baseline surveys within Low Fen Drove Way Grassland and Hedges CWS.
- 2.1.2 The Applicant has reviewed the Bedfordshire, Cambridgeshire and Northamptonshire (BCN) Wildlife Trust Local Wildlife Site (LWS) 2023 site survey, and summarises that both this survey and the Applicant's 2021 survey align. The differences in the conclusions drawn are due to the methodologies differing.
- 2.1.3 Comparing the raw data of the Applicant's 2021 surveys to the BCN's 2023 survey data highlights that the calcareous grassland species noted by BNC were also thinly scattered within County Wildlife Site (CWS) grassland during the 2021 NVC surveys. However, they were too thinly represented to be present within the quadrat data. The vegetation community determined by a National Vegetation Classification (NVC) survey is determined by species which are 'constant' i.e. present within 61-100% of surveyed quadrats and hence the calcareous species are too infrequent to influence the NVC community.
- 2.1.4 It should also be noted that the calcareous indicator plant species mentioned within the BCN report were never very frequent within the grasslands, the only two species listed as being 'frequent' within the report are upright brome (*Bromopsis erecta*) and common knapweed (*Centaurea nigra*).
- 2.1.5 The NVC allows for a standardised methodology to be followed and then using the NVC community to determine if the grassland present matches the definitions of Habitat of Principal Importance (HPI) Lowland Calcareous Grassland (CG1 - 10) or HPI Lowland Meadows (MG1c-e, MG2, MG4 MG5, MG7c and MG8). From our 2021 survey data, it is clear that the grassland can be determined to be MG1a (MG1a *Arrhenatherum elatius* grassland *Festuca rubra* sub-community). This grassland does not meet the definitions to be classed as either HPI Lowland Calcareous Grassland or HPI Lowland Meadows. The grassland within the CWS would correspond to Grassland - Other neutral grassland (BNG Metric) or g3c5 *Arrhenatherum* neutral grassland in UKHab.
- 2.1.6 If the grassland on the western end of CWS was indeed CG3 *Bromus erectus* grassland as stated within the original CWS citation, one would expect upright brome to be a dominant component of the grassland vegetation and based on the Applicant's 2021 survey this is no longer the case.

- 2.1.7 It is also worth highlighting that according to the BCN report no unimproved calcareous grassland is present within the CWS, instead only a small amount of semi-improved calcareous grassland is present and is degrading rapidly. The Applicant therefore disagrees with Cambridgeshire County Council that 'unimproved calcareous grassland' is still present in 2023.

### **Lighting impacts on Low Fen Drove Way Grassland and Hedges CWS**

- 2.1.8 The Applicant notes the comments at 5.6 about the impacts of lighting on Low Fen Drove Way Grassland and Hedges CWS and the council's request for further information within the Lighting Design Strategy.
- 2.1.9 The Applicant's position is that Requirement 14 of the draft DCO secures a detailed construction lighting strategy and Requirement 7(3) of the draft DCO secures details of operational lighting in the detailed design. Both of these aspects require approval by the relevant planning authority before that phase can commence, therefore further information will be provided in due course by the Applicant and will have to ensure that this is sufficient to mitigate the council's concerns before it is able to proceed.
- 2.1.10 Chapter 2 of application document 5.4.2.5 Environmental Statement Appendix 2.5 Lighting Design Strategy presents a summary of the legislation, planning policy, standards and guidance that the lighting design must adhere to or are relevant to identifying measures to minimise the potential for light from the Proposed Development being prejudicial to the health or create a nuisance to its users or sensitive receptors in the surrounding landscape. Section 2.4 of this strategy document then presents Guidance Note 08/18 Bats and Artificial Lighting in the UK, Bats and the UK (ILP and Bat Conservation Trust, 2018) as the guidance to be followed for designing artificial exterior lighting in close proximity to light sensitive ecology.

### **Setup of stakeholder Advisory Group to discuss matters such as recreational use**

- 2.1.11 The Applicant notes the comments at 5.8 in relation to paragraph 4.1.2 and 4.1.4 of ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [AS-066] and the commitment to the setup of stakeholder Advisory Group to discuss matters such as recreational use. This suggestion is also welcomed by Natural England, South Cambridgeshire District Council and The National Trust. The Applicant proposes a combined meeting to discuss how this group should be formed and managed.

### **Monitoring / BNG audits of habitats works that fall outside the land covered by the LERMP**

- 2.1.12 The Applicant notes the comments at 5.29 and has included a new Requirement into the draft DCO (App Doc Ref 2.1) submitted at Deadline 3 that addresses this point.

- 2.1.13 Requirement 25(2)(c) of the draft DCO (App Doc Ref 2.1) submitted at Deadline 3 states that an updated biodiversity net gain report will be submitted for approval by the relevant planning authority and will detail the habitat management and monitoring of the biodiversity net gain for the whole of the authorised development. This is likely to signpost out to other documents that will provide monitoring and management, where required.
- 2.1.14 Section 6 of the Biodiversity Net Gain Report [REP2-020] under paragraph 6.1.1 states: "For BNG and temporary works where habitats are retained and or reinstated for the Waterbeach pipeline, treated effluent and storm pipelines and outfall to the River Cam, transfer tunnel, existing Cambridge WWTP, Requirement 8 (code of construction practice) of the draft DCO (App Doc Ref 2.1) will apply for habitat reinstatement measures and monitoring for five years post-construction."
- 2.1.15 Section 7 and Table 7-1 of the Biodiversity Net Gain Report [REP2-020] also states that land temporarily required will be covered in the CoCP Part A and Part B, with the duration of monitoring covered for five years and secured by Schedule 2 Requirement 8 of the draft DCO.
- 2.1.16 The Applicant has updated the draft DCO to include a single requirement for BNG which includes monitoring and reporting requirements.

### **Reinstatement of arable flora and other habitats**

- 2.1.17 The Code of Construction Practice Part A (App Doc Ref 5.4.2.1) has been updated to make the Applicants commitments clearer to reinstatement, including the councils suggests for arable flora.

## **2.2 Carbon**

- 2.2.1 The Applicant notes the comments at 6.10c) and is preparing a note that provides this. It is anticipated that this note will be submitted at Deadline 4.

## **2.3 Draft DCO drafting**

- 2.3.1 With regards to the comment at 10.6, the Applicant responds as follows:
- 2.3.1.1 The Applicant is content to provide a programme of proposed temporary closures and has added a Requirement to this effect. This can be seen in the draft development consent order (Document reference 2.1) submitted at deadline 3.
- 2.3.1.2 The proposed new bridleway will utilise an existing surface and therefore it is not necessary for the County Council to be provided with details of this. The only additional works will be the erection of signs and gates. Please see the Landscape, Ecological and Recreation Management Plan (Document reference 5.4.18.4) which states at paragraph 3.1.7: A new bridleway will be established to the east of the site, using the existing surface along the former railway line to link Low Fen Drove Way with Station Road.

## 2.4 Traffic and Transport

- 2.4.1 The Applicant notes the comments at paragraph 20.39 in relation to the Waterbeach Access Route. The applicant can confirm it has engaged with The Waterbeach Development Company (WDC) as the developers of Waterbeach New Town East and GCP and SLC Rail (SLC) as the developers of the Waterbeach New Station to confirm that the use of Bannold Road is the proposed access route for the delivery of the pipeline and to access sites, COA12, COA13, COA14, COA17, COA18, COA26. The Applicant continues to collaborate with WDC and SLC on their proposal to submit an application for a haul road access route for the station to be built to the north of the proposed station site which would avoid any access via Waterbeach village.
- 2.4.2 This collaboration seeks to ensure the avoidance of any conflicts between the construction traffic for the developments and the appropriate management of traffic. This engagement will continue with the submission of Construction Traffic Management plans for these developments.
- 2.4.3 The Applicant notes the comments at 20.92 and will discuss this point further in meetings with the council to agree a way forward.

## 3 Applicants comment on CCC's comments on the Applicants Response to Relevant Representations [REP1-078]

### 3.1 Carbon Emissions

3.1.1 The Applicant has responded to CCC'S comments on the topic of carbon emissions in Section 2 above.

### 3.2 Water Resources – Drainage Strategy

3.2.1 The Applicant notes the councils requests for further detail on the Drainage Strategy (App Doc Ref 5.4.20.2)[**APP-162**] however the level of detail currently provided within the Drainage Strategy accurately reflects the stage at which the design is currently progressed to. Where the Applicant is able to provide further clarification this has been set out in the paragraphs below.

3.2.2 The Applicant has noted the comments regarding the self-contained drainage and a need for it to be shown on a drainage layout plan. The Applicant will provide an updated drainage layout plan showing the location of the separate drainage system which will take runoff from the impermeable areas of the proposed STC and return it to the inlet works for treatment and the Rain Water Harvesting system at Deadline 4.

3.2.3 With regard to CCC's comments on Table 3-3, item 14.4 (p110), the self-contained drainage system will be held in the pumping station located with Work No. 8 as noted in Section 4 of the Drainage Strategy (App Doc Ref 5.4.20.2)[**APP-162**]. The Environmental Permit for the Sludge Treatment Centre (STC) will require us to control emissions to water from the operational areas therefore the scope of the self-contained drainage system covers all operations which will be regulated under that permit and the potential for contaminated runoff. The flow from the self-contained drainage system is accounted for however, the volume discharged will be insignificant compared to that from the wider network and therefore will have no impact on the capacity of the WWTP.

3.2.4 The whole treatment works area (approximately 20ha) was used in the greenfield runoff area calculations as that represents the land being developed. It has been assumed that the wider site, including bunds and the surrounding area, will remain green (and is assisted by SuDS features, such as swales) so that any runoff will continue to function as existing (as a greenfield area).

3.2.5 The Applicant agrees that the majority of the developed site (approx. 20ha) is effectively impermeable. However, note that:

- Approximately 36% of this area has been classified as 'potentially contaminated' (as stated in Table 4-1 of the Drainage Strategy) and any runoff

will be collected and returned to the head of the works for treatment; this runoff will be attenuated (utilising storage facilities in the works), and once treated (over an extended period of time) will outfall to the River Cam (via the final effluent pipeline and/or storm pipeline) at a later time.

- The remaining 64% of area has been classified as 'uncontaminated' and will be drained via the 'Drainage Attenuation Facility' (as identified in Figure 8.3 of the Drainage Strategy) to the local catchment at a rate not exceeding the greenfield rate for the site.
- 3.2.6 The Applicant is therefore of the opinion that it is correct to use the whole site (approx. 20ha) in the greenfield runoff calculations (as that is the current situation) and that the return flow from the uncontaminated runoff areas will be attenuated to match this greenfield condition.
- 3.2.7 The areas where Rainwater Harvesting (RWH), within the proposed WWTP, are intended are identified in the drainage area layout plan (see Figure 4.1 of the Drainage Strategy). The areas selected for RWH are relatively small, approximately 1% of the area of the treatment works site (as stated in Table 4-1 of the Drainage Strategy). The Applicant has clearly stated (paragraph 4.8.3, item G12) that any overflow from the RWH system will "be diverted to the main clean drainage system for the site". The Applicant confirms that the RWH area (approximately 0.2ha as per Table 4-1 of the Drainage Strategy) will be included in the volumetric calculations. The Applicant intends to add the RWH area (0.2ha) to Areas 3 and 7, increasing the areas to be drained from 12.3ha to 12.5ha. This small adjustment (to the drainage area and any resultant attenuation volume) will be carried out during detailed design.
- 3.2.8 The Applicant notes CCC's request for further information on the access road runoff and additional stage treatment, however the provision of this information is subject to the need to carry out further detailed design and therefore as previously stated the intention is to provide this through requirement 15 of the draft Development Consent Order.
- 3.2.9 The above position also relates to CCC's request for hydraulic calculations and the Applicant's position as set out in the Applicant's Response to Relevant Representations (App Doc Ref 8.2)[**REP1-078**] remains unchanged.



## Get in touch

You can contact us by:



Emailing at [info@cwwtpr.com](mailto:info@cwwtpr.com)



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



Writing to us at **Freepost: CWWTPR**

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

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

Cambridge Waste Water Treatment Plant Relocation Project  
Anglian Water Services Limited

# Applicant's comments on other Deadline 2 submissions

Application Document Reference: 8.18  
PINS Project Reference: WW010003  
APFP Regulation No. n/a

**Revision No. 01**  
18 December 2023

## Document Control

<b>Document title</b>	Applicant's comments on other Deadline 2 submissions
<b>Version No.</b>	01
<b>Date Approved</b>	18/12/23
<b>Date 1<sup>st</sup> Issued</b>	18/12/23

## Version History

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Description of change</b>
01	18/12/23	-	Submitted to the ExA at Deadline 3

## Contents

<b>1</b>	<b>Introduction</b> .....	<b>1</b>
1.1	Introduction.....	1
<b>2</b>	<b>Horningsea Parish Council [REP2-072 and REP2-073]</b> .....	<b>2</b>
2.1	Horningsea Parish Council's responses to Cambridgeshire County Council (CCoC) Local Impact Report [REP1-133] .....	2
2.2	Horningsea Parish Council's responses to South Cambridgeshire District Council (SCDC) Local Impact Report [REP1-139].....	4
<b>3</b>	<b>Fen Ditton Parish Council</b> .....	<b>6</b>
<b>4</b>	<b>Chris Smith</b> .....	<b>8</b>
<b>5</b>	<b>The National Trust</b> .....	<b>9</b>

# 1 Introduction

## 1.1 Introduction

- 1.1.1 This document provides Anglian Water Services Limited (the Applicant) comments on submissions received at Deadline 2 for the Cambridge Waste Water Treatment Plant Relocation Project (CWWTPRP).
- 1.1.2 This document does not seek to respond to every submission made at Deadline 2 (6<sup>th</sup> December 2023) or to repeat matters which are already set out in documents available to the examination – rather its purpose is to address any new concerns which may have arisen, correct any omissions or provide signposting of clarification where deemed necessary.
- 1.1.3 The Applicant has responded to the following items submitted at Deadline 2:
- Horingsea Parish Council – Comments on Response to Cambridgeshire County Council (CCoC) Local Impact Report [REP1-133] and Comments on Response to South Cambridgeshire District Council (SCDC) Local Impact Report [REP1-139].
  - Fen Ditton Parish Council – Comments on any submissions received at D1 – 1 [REP2-056]
  - Chris Smith – Comments on responses to ExA's ExQ1 [REP2-071]
  - National Trust – Comments on responses to ExA's ExQ1 [REP2-057]
- 1.1.4 The Applicant has no comments on information received at Deadline 2 from Dr Olwen Williams [AS-172] as the points raised in the additional submission have already been responded to by the Applicant in response to other stakeholders and community members.

## 2 Horningsea Parish Council [REP2-072 and REP2-073]

### 2.1 Horningsea Parish Council's responses to Cambridgeshire County Council (CCoC) Local Impact Report [REP1-133]

- 2.1.1 The Applicant notes Horningsea Parish Council's responses to Cambridgeshire County Council (CCoC) Local Impact Report [REP1-133]. The Applicant responds below to those comments that relate to the Proposed Development. Comments that relate to the future development of the existing site are for the Local Planning Authorities. Comments on the local plan process and potential alternative sites for housing provision are not discussed in this document. The Applicant will make further representations on these issues if requested by ExA.
- 2.1.2 The Applicant notes the comment at paragraph 1.12. The existing site is a brownfield site as it meets the definition of previously developed land in the NPPF. The stakeholder is correct that the existing site is a fully operational Waste Water Treatment Plant.
- 2.1.3 The Applicant disagrees with this interpretation and refers to its response to ExQ1-2.3 in respect of the effect of the NPSWW (REP1-079).
- 2.1.4 In respect of the Parish Council's comments in section 2 and 3.10 of their comments [REP2-072], the Applicant refers to the Local Policies Accordance Tables (App Doc Ref 7.5.5-REP1-054).
- 2.1.5 **Topic 3 Biodiversity:** The Applicant notes the comments and refers the Stakeholder to the Applicants responses to CCC's comments on ExQ1 (App Doc Ref 8.17) at paragraphs 2.1.11 - 2.1.15 headed "Monitoring / BNG audits of habitats works that fall outside the land covered by the LERMP" which deal with these points.
- 2.1.6 **5.16** In relation to comments made at 5.16 about the potential for pollution of the Black Ditch with its connection to Stow-cum-Quy Fen SSSI, the Applicant has responded to these concerns with the preparation of the detailed Drainage strategy (App Doc Ref 5.4.20.12) and the Water Quality Monitoring Plan (App Doc Ref 5.4.20.13) [ REP 028]The Applicant as a result of engagement with the Internal Drainage Board has also confirmed that the Black Ditch does not connect to Bottisham Lode and that there is no artificial intervention in flow direction. No dams or boards are used to retain water in the Black ditch in dry periods, flow is not measured in the Black Ditch it is mostly stagnant until there is heavy rainfall. There is no known connection in place between Black Ditch and Quy Water at the southern end. The Applicant refers to the Statements of Common ground with the Swaffam and Waterbeach Internal Drainage Boad (App Doc Ref 7.14.15 and App Doc Ref 7.14.20).

- 2.1.7 **5.16** The Applicant notes the concerns raised about future recreational impact and has agreed to discuss how this may be reviewed and managed further as part of an Advisory group. The Applicant refers to the Applicants responses to CCC's comments on ExQ1 (App Doc Ref 8.17) at paragraph 2.1.10 Setup of stakeholder Advisory Group to discuss matters such as recreational use.
- 2.1.8 **5.19 -5.23** The Applicant notes the comments and refers to Requirement 10 [AS-139] of the dDCO which addresses the delivery of the outfall and its associated biodiversity impacts.
- 2.1.9 **5.27** In relation to comments made at 5.27 about water vole habitat and details on their care and relocation, the Applicant refers to their Comments on the Local Impact Reports (App Doc Ref 8.11) [**REP2-036**].

*"The Applicant has provided a plan within the updated ES Appendix 8.13 Biodiversity Net Gain Report (App Doc Ref 5.4.8.13) provided at Deadline 2, which provides information on the location of the proposed water vole compensation ditches, as well as those provided for habitat compensation and biodiversity net gain. The Applicant does not envisage a need to trap and translocate (as outlined in the Water Vole Natural England Ghost Licence Method Statement (App Doc Ref 5.4.8.22) [APP107]) with displacement methodologies only. The compensation ditches within Works No. 39 will be provided prior to works affecting water vole habitats commencing, to support continuous habitat availability for water voles during works."*

- 2.1.10 **5.27** In relation to comments made at 5.27 about the request for a Reptile Mitigation Strategy, the Applicant refers to the Comments on the Local Impact Reports (App Doc Ref 8.11) [**REP2-036**].

*"The Applicant outlines in paragraphs 7.2.47-7.2.50 of CoCP Part A (App Doc Ref 5.4.2.1) [REP1-025] that a Reptile Mitigation Strategy will be prepared by the contractor prior to works commencing, and this strategy will be agreed by the local authority ecologist. The CoCP Part A (App Doc Ref 5.4.2.1) [REP1-025] does not provide detail on possible mechanisms to avoid potential double-handling of animals during translocations, with this detail to be provided as part of the agreed Reptile Mitigation Strategy."*

- 2.1.11 The Applicant has provided a response in relation to lighting impacts upon Low Fen Drove Way Grasslands and Hedgerows County Wildlife Site within ExQ1 5.6 (App Doc Ref 8.3) [**REP1-079**].
- 2.1.12 **Topic 5 Health:** The Applicant refers to the Community Liaison Plan (App Doc Ref 7.8) [**AS-132**], secured by Requirement 9 of the draft DCO (App Doc Ref 2.1) [**AS-139**], which will provide a conduit for the continued engagement with the community throughout the delivery of the Proposed Development. This would provide local residents and community members a forum to raise and address concerns including health and wellbeing matters.

- 2.1.13 **Topic 8 Landscape and Visual Amenity:** The Applicant refers to its Response to Relevant Representations [**REP1-078**] at Table 4-9.
- 2.1.14 **Topic 11 Transport and Traffic:** The Applicant notes the comments and is actively engaged with CoCC to review comments they have raised in their Local Impact Report regarding the construction phase impacts and any further mitigation measures proposed. The outcome of these discussions will be recorded in the Statement of Common Ground and in any amendments to the Construction Traffic Management Plan (CTMP) (App Doc Ref 5.4.19.7) [**AS – 109**].
- 2.1.15 **13.29** The Applicant has engaged with Waterbeach Development Company (WDC) and SLC Rail in their proposed application for a separate haul road that would allow them access via the Waterbeach New Town Development. The Applicant will continue to collaborate with both WDC and SLC Rail to ensure the appropriate management of any conflicts. The ability of The Applicant to use the proposed haul road will be dependent on timing and delivery.

## 2.2 **Horningsea Parish Council's responses to South Cambridgeshire District Council (SCDC) Local Impact Report [REP1-139]**

- 2.2.1 The Applicant notes Horningsea Parish Council's responses to South Cambridgeshire District Council (SCDC) Local Impact Report [REP-133]. The Applicant responds below to those comments that relate to the Proposed Development. Comments that relate to the future development of the existing site are for the Local Planning Authorities. Comments on the local plan process and potential alternative sites for housing provision are not discussed in this document. The Applicant will make further representations on these issues if requested by ExA.
- 2.2.2 **3.2** The existing site is a brownfield site as it meets the definition of previously developed land in the NPPF. The stakeholder is correct the existing site is a fully operational Waste Water Treatment Plant.
- 2.2.3 **3.3** In relation to 3.3 and the conservation area this is addressed in the ES Volume 4 Chapter 13 Historic Environment [REP1-023].
- 2.2.4 **4.1** The Applicant notes the comment in 4.1 not an NSIP but dealt with as an NSIP. and refers to its response to ExAQ1 in respect of the effect of the NPSWW (2.3, REP1-079).
- 2.2.5 **6.74** The Applicant refers to 21.58 of its response to ExAQ1 (**REP1-079**) in respect of water supply issues in the Cambridge area.
- 2.2.6 **6.91** The Applicant notes the comments in 6.91 and refers to the information set out in the Planning Statement Strategic Carbon Assessment App Doc Ref 7.5.2 [**APP-206**]
- 2.2.7 **6.95** The Applicant notes the comments at 6.95 and refers to the Consultation Report at (App Doc Ref 6.1 ) [**AS – 115**] which details the full responses to submissions during consultation.



- 2.2.8 **7.13** The Applicant notes this comment and refers to the Planning Statement [REP1-49] where the Very Special Circumstances are set out. The Applicant also refers to the Green Belt Assessment [APP-207]
- 2.2.9 **7.15** The Applicant refers to its response 6.7 of ExQ1 and ES Chapter 9 Climate resilience [APP-041]. In relation to the increased public access, the Applicant does not agree that with comments in relation to increased public access. The Proposed development provides a new bridleway connection enhancing connections for walkers, cyclists and horse riders to the existing formal PRoW network, providing new circular routes and enhancing accessibility between communities.
- 2.2.10 **8** – The Applicant notes the comments on landscaping matters and refers to its response to the South Cambridgeshire LIR [REP2-036] at Table 2-1.
- 2.2.11 **9** – The Applicant notes the comments on heritage matters and refers to its response to the South Cambridgeshire LIR [REP2-036] Table 2-1.
- 2.2.12 **13** – The Applicant notes the comments on odour regarding reduced flows in the Cam and refers to its response to the South Cambridgeshire LIR [REP2-036] Table 2-1.
- 2.2.13 **15** – The Applicant notes the comments on insufficient information about potential for noise. The Applicant notes that Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-101] secures the provision of a noise and vibration management plan to be submitted and approved alongside the Construction Environmental Management Plan (CEMP) which will include agreement of complaint notification procedure, community liaison and monitoring.
- 2.2.14 **16** – The Applicant notes the comments on lighting. Requirement 14 of the dDCO (App Doc Ref 2.1)[REP1-003] requires detailed construction lighting design strategies to be submitted to and approved by the relevant planning authority,
- 2.2.15 17** – The Applicant notes the comments on health matters. The Applicant refers to the application of the Community Liaison Plan (App Doc Ref 7.8) [AS-132], secured by Requirement 9 of the draft DCO (App Doc Ref 2.1) [AS-139], which will provide a conduit for the continued engagement with the community throughout the delivery of the Proposed Development. This would provide local residents and community members a forum to raise and address concerns including health and wellbeing matters.

### 3 Fen Ditton Parish Council

- 3.1.1 The Applicant notes Fen Ditton Parish Council's agreement with responses to ExA's ExQ1 by Save Honey Hill's (SHH) contained in SHH's documents 18, 26, 28, 29 and 30 and refers to the Applicant's responses to these comments in Document Reference 8.14.
- 3.1.2 In relation to comments made at 5 iii) on LIRs, the Applicant confirms that there has been no recent site activity related to the proposed development around badger sets. Para 8.1.13 of the Preliminary Ecological Appraisal (AS-072) states: *The Proposed Development has the potential to support common and notable terrestrial invertebrate assemblages in the hedgerows and woodland. The Low Fen Drove Grasslands and Hedges CWS is known to support notable terrestrial invertebrates (rare and vulnerable Hymenoptera) and this was highlighted during the stakeholder consultation.* Following the Preliminary Ecological Appraisal, the Applicant undertook further survey work for terrestrial invertebrates, with additional information regarding terrestrial invertebrate species recorded (both within the desk study and previous records, and following a field study) provided within the Terrestrial Invertebrates Baseline Technical Appendix (App Doc Ref 5.4.8.6) [APP-091].
- 3.1.3 The landscape masterplan within the LERMP (App Doc Ref 5.4.8.14) recognises the findings from the baseline surveys, the Applicant refers to paragraph 3.4.9 which states: 'The design will encourage natural colonisation where possible adjacent to the Low Fen Drove Way Grasslands and Hedges County Wildlife Site (CWS). Enhancement and potential extension of the CWS by the creation of a new area of semi-improved neutral grassland buffering (minimum 15-20m wide) the northern boundary of the CWS has also been designed to ensure no shading or encroachment on the existing habitats associated with the CWS. It is also proposed to improve the condition of the CWS through habitat management proposals, which could include clearing scrub in areas to restore semi-improved neutral grassland and unimproved calcareous grassland. The aim is to buffer, enhance, and improve the resilience of the CWS, keeping tree planting away from the margins of the CWS to maintain the grassland, which is used by a diverse invertebrate assemblage. The buffer will in time become a ride type habitat between the CWS and new planting within the site, this is visible in both the Landscape Masterplan (Figure 3.1, above) and the Proposed Ecology Features Plan (Figure 3.10)'.
- 3.1.4 There are no proposals that require removal of habitats as part of the CWS.
- 3.1.5 The Applicant notes the comments made at 5.3 (i) regarding its recommendation for an increased height of the bund to improve visual screening. As per the Applicant's responses to comments made in Relevant Representations (see Document Reference 8.2), the Applicant also responded to comments submitted during the Consultation process suggesting the earth bank height should be reduced to limit the visual impact to the area. The Applicant adapted the design and lowered a number of the larger structures within the proposed WWTP to minimise visual impact. The height of the earth bank was also reduced to reflect the amount of spoil that will be

available to create it from a sustainable resource. More tree planting was introduced to further improve this reduction and mitigate visual impacts.

- 3.1.6 The Applicant acknowledges the comments and considers that the planting proposals set out in application document 5.4.8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [AS-066] are appropriate and together with the earth bank would filter and screen views of the proposed WWTP from the majority of views at year 15.
- 3.1.7 The Applicant notes the comments at 6.1 (i) on Alternatives and refers to the Applicant's responses to these points made in SHH's Written Representation in Document Reference 8.13, table 2-11, section 4.5.
- 3.1.8 The Applicant notes the comment at 6.1 (ii) and confirms the reference to "northbound" will be corrected to "southbound".
- 3.1.9 The Applicant confirms that Fen Ditton Parish Council will remain a key stakeholder engaged on the project as mentioned in 6.1 iii) and iv).
- 3.1.10 The Applicant notes the comments made regarding traffic in construction and operation and refers to responses provided in Document 8.2, table 3-9 Traffic.

## 4 Chris Smith

- 4.1.1 The Applicant disagrees that the surveys carried out did not comply with good practice and that the approach was not agreed with the Technical Working Group. The surveys carried out were in line with good practice and the approach agreed with the Technical Working Group in 2019.
- 4.1.2 With the additional information provided, Cambridgeshire County Council's concerns initially raised as RR-001, and referred to within ExQ1 5.17, regarding bat surveys have been resolved [**REP2-040**].
- 4.1.3 The Applicant has also provided further consideration of Eversden and Winpole Woods SAC within the HRA Screening Report and HRA Report [**REP2-022** and **REP2-024**]. The Applicant acknowledges that barbastelle were recorded associated with Owlstone Croft, and notes that barbastelle were recorded as part of their own surveys undertaken. This activity was included within the assessments made and helped to inform recommendations for this species and the species assemblage.
- 4.1.4 The CoCP Part A [**REP1-025**], (section on bats paragraphs 7.2.22 to 7.2.28), includes detail (paragraph 7.2.24) that "Further pre-construction bat surveys of trees identified as having the potential to support bat roosts will be undertaken by an ecologist if there is a risk of impact. Preconstruction assessment, climbed/aerial survey and/or dusk to dawn surveys (or surveys as supported by the most up to date guidance) will be carried out as appropriate to re-assess the status of roosting bats." This allows for further surveys that would also be completed under the most up to date BCT guidance (Collins, 2023).

## 5 The National Trust

- 5.1.1 The Applicant notes the comments in relation to Hydrology/hydrogeology and refers to the now final version of the Outline Water Quality Monitoring Plan (App Doc Ref 5.4.20.23) which has been agreed with the Environment Agency. The Applicant notes that The National Trust will review this final document following this approval and provide comments as appropriate.
- 5.1.2 The Applicant has noted that The National Trust would support monitoring of Wilbraham Fens on a precautionary basis. The Applicant has confirmed in the Outline Water Quality Monitoring Plan (App Doc Ref 5.4.20.23) that the Wilbraham Fen is not directly fed by groundwater from the chalk and therefore any dewatering impacts the proposed development might have on the chalk are highly unlikely to propagate through to Wilbraham Fen. Even if the Fen was directly dependent on groundwater from the chalk, the expected impact of dewatering on groundwater levels would be less than 1mm. This is tiny and would not be noticeable in borehole groundwater level readings, as average seasonal variation of groundwater levels at Wilbraham Fen is of the order of 0.5m. The Environment Agency agree that monitoring of Wilbraham Fen is unnecessary.
- 5.1.3 The Applicant acknowledges the comments in relation to Access and Recreation and concerns about recreational pressure and how this is monitored and managed. The Applicant refers to the ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [AS-066] and the commitment to the setup of a stakeholder Advisory Group to discuss matters such as recreational use. This suggestion is also welcomed by Natural England, South Cambridge District Council and Cambridgeshire County Council.
- 5.1.4 The Applicant notes the potential for further discussions and proposes a combined meeting to discuss how this Advisory group should be formed and managed.

## Get in touch

You can contact us by:



Emailing at [info@cwwtpr.com](mailto:info@cwwtpr.com)



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



Writing to us at **Freepost: CWWTPR**

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

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