



The Planning Inspectorate

Application by Anglian Water Services Limited for an Order Granting Development Consent for the Cambridge Waste Water Treatment Plant Relocation project (Ref WW010003)

Action points arising from Issue Specific Hearing 3 on 10 and 11 January 2024

All information to be provided by Deadline (D) 4 on Monday 22 January 2024

Action No.	Directed to	Action
Transport		
1	National Highways, Cambridgeshire County Council, Applicant	Provide your definitive position on mounted equestrian use of the A14 overbridge.
2	Applicant	Review all application documents, including the CoCP and ES chapters, in respect of the maximum height of cranes and other structures on the site and address any inconsistencies (both 10m and 15m are noted).
3	National Highways	Provide opinion on suitability of A14 Junction 34 (including in respect of weight and geometry) for AIL.
4	National Highways and Applicant	Liaise on traffic and transport matters to enable comprehensive submissions / responses to be made at D4.
5	National Highways	National Highways to review and comment on Applicant's sensitivity test [REP3-041] regarding Milton Interchange, including whether any mitigation would be sought.
6	National Highways	Review and provide comments on CTMP and suggestion of the need for marshalling of traffic on National Highways' network [REP1-044; paragraph 4.2.4].
7	National Highways	Confirm whether analysis of A14 J35 is still required.
8	Cambridgeshire County Council	Clarify the reason for Cambridgeshire County Council's LIR [REP1-133, table after paragraph 13.26] including references to operational accesses (OA refs) when the section appears to address construction traffic concerns.

9	Applicant	Update CTMP regarding revised Cowley Road, Fen Road, Burgess's Drove and Bannold Drove construction traffic timings that have been suggested by Cambridge County Council (and verbally agreed by the Applicant during ISH3) and consider whether any parts of the ES and Transport Assessment need to be updated to reflect those timings (for example tables which set out the hourly distribution of construction traffic).
10	Applicant	Seek response from emergency services in respect of emergency vehicle access to roads which form part of construction traffic routes.
11	Applicant, Cambridgeshire County Council, National Highways	<p>To provide a schedule which sets out in relation to each transport mitigation plan:</p> <ul style="list-style-type: none"> • where the plan is secured in the draft DCO (e.g. the requirement number); • the name of the approving authority (the authority that will approve the mitigation plan or any submissions that are made in relation to it); • the name(s) of any consultee(s) (parties who will be consulted by the approving authority before it approves the mitigation plan or submissions that are made in relation to it); and • Confirmation as to whether the approving authority and any consultee(s) are, as relevant, content with each mitigation plan and that it includes satisfactory: <ul style="list-style-type: none"> ○ trigger points; ○ monitoring provisions; and ○ mitigation provisions. <p>The ExA understands that at this point in time agreement may not have been reached with all parties in respect of all mitigation plans. At D4 please provide a schedule which sets out the current position and continue to endeavour to reach agreement during the course of the Examination. Please also indicate any matters in relation to which it has not been possible to reach agreement.</p>
12	Applicant	Confirm which activities are 'time critical' with reference to page 20 of [REP2-036].
13	Applicant	Add an AIL route map to the CTMP showing the route that AIL would be restricted to.
14	Applicant	Provide evidence in relation to the appropriateness of routes in Waterbeach for HGVs associated with the construction phase.

15	Applicant	Provide a drawing which illustrates whether there is sufficient space to act as an exclusion zone around the site which would address National Highways' concerns in relation to crane / structure accidents.
16	Applicant	Clarify reference at 4.2.244 of [REP3-022] to <i>Bannold Road junction with Denny End Road / Car Dyke Lane</i> .
17	Applicant	Explain why there is an apparently absolute commitment to not direct any construction traffic through Horningsea.
18	Cambridgeshire County Council and National Highways (as relevant)	Confirm whether there are any currently-programmed significant roadworks for the A10 and the A14 (insofar as they form part of construction traffic routes) during the construction period for the proposed WWTP and Waterbeach pipeline.
19	Applicant	Add details to the CTMP and CLP in relation to how stakeholders / communities would be consulted if a decision were made to use a haul road across the Waterbeach New Town site for construction traffic instead of existing roads in Waterbeach.
20	Cambridgeshire County Council	Confirm your view as to whether the CTMP is an acceptable way to secure the proposed Construction Forum / Liaison Group.
21	Applicant	Liaise with and assist Waterbeach Parish Council in navigating application documents and explain how the mitigation of construction traffic effects in Waterbeach is intended to work.
22	National Highways	Provide a response to ExQ1 [PD-008].
23	Applicant	Review Transport Assessment and ES Chapter 19 and correct errors (e.g. in Transport Assessment Table 9-15 where '-107' is noted for the A14 off-slip; incorrect table number references in the text of those documents; incorrect table descriptions / headings; and discrepancies such as between Table 4-7 and 4-29).
24	Applicant	Explain why PCU figures are notably different for the peak and pre-peak periods when the differences between the peak and pre-peak periods in Transport Assessment Table 9-15 are of a much smaller order of magnitude. If this is because of any differences in the phasing of traffic lights at different times, please indicate where this is explained in the Transport Assessment.

25	Applicant	Bearing in mind Cambridgeshire County Council's comment that there is not a single peak hour in Cambridge [REP1-134, response to EXQ1.20.85] and that some off-peak traffic flows at J34 are not significantly different from peak traffic (discussed during ISH3), provide a review of all of the periods set out in ExQ1.20.81, explaining whether traffic during any of these periods would exceed the threshold that was used to assess whether mitigation was needed during the assessed 'peak' hours. For the avoidance of doubt, the ExA is seeking commentary for each arm of J34 rather than for the junction as a whole.
26	Cambridgeshire County Council	Response in relation to proposed mitigation for operational traffic at J34.
27	Applicant and Cambridgeshire County Council	If there are limitations on the use of ANPR data and if OLTP measures might not be effective or enforceable (per Cambridgeshire County Council's comment in relation to ExQ1.20.85 [REP1-134]), to what extent is it justifiable to require such measures via a DCO?
28	Applicant	Change reference in the third row of Schedule 9, Part 2 of the dDCO [REP3-003] relating to permanent site access from 'southbound' to 'northbound'.
29	Cambridgeshire County Council	To clarify Cambridgeshire County Council view as to whether a commitment to use low emission vehicles should be secured, and if so, how.
30	Cambridgeshire County Council	Clarify the basis for the request for road damage payment(s) in association with the proposed WWTP given that the Applicant indicates that operational vehicle movements would not be significantly different from those associated with existing WWTP. Confirm whether the Applicant has been required to make such payment(s) to the local highways authority for traffic associated with the existing WWTP.

31	Applicant	<p>In relation to vehicle parking:</p> <ul style="list-style-type: none"> • Clarify the number of spaces being applied for. • Ensure that all references in the application documentation are correct, clear and consistent. • Explain how providing more car parking than is necessary (a ratio of 2:1, based on proposed staff numbers at the proposed WWTP) would support the target modal shift to non-motorised / shared transport. • Explain how providing more car parking than is necessary is consistent with policy encouraging sustainable travel. • Clarify where 100% occupation of proposed vehicle parking has been assessed in the application documentation.
32	Applicant	In relation to existing and future staff numbers, ensure that all references in the application documentation are correct and consistent.
33	Applicant	Correct SoCG and PADS to remove the erroneous reference to Cambridge City Council's and South Cambridgeshire District Council's dissatisfaction with the proposed site access arrangements.
34	National Highways	Explain the process for considering a direct access from the Strategic Road Network.
Carbon		
35	Applicant	<p>Submit the Design Code referenced under R7 of the dDCO which should secure / clarify the following:</p> <ul style="list-style-type: none"> • The Proposed Development would achieve BREEAM 'excellent' standard; and • How the dDCO would allow for design refinement, monitoring and review of carbon emissions.
36	Applicant	<p>Clarify the narrative of baseline scenarios in ES Chapter 10 [REP3-019] for decommissioning, construction and operation of the Proposed Development, including further information on the following matters:</p> <ul style="list-style-type: none"> • CHP option / DM0 baseline; and • Baseline for operational carbon emissions of the existing WWTP.
37	Applicant	Clarify any cumulative carbon effects in relation to the Waterbeach pipeline construction and in respect of pumping operations.

38	Applicant	Confirm the year of average emissions in ES Chapter 10 [REP3-019] table 4-5 and the net carbon emissions per mega litre for the existing WWTP.
39	Applicant	Update ES Chapter 10 [REP3-019] to make clear whether the whole life carbon assessment covers decommissioning of the existing WWTP (the summary at the start of the document suggests that decommissioning is included, whereas para. 4.6.1 suggests that it is not).
40	Applicant	Clarify why sludge deliveries are not included in the carbon assessments.
41	Applicant	Address decarbonisation of the gas grid within the carbon assessments, notwithstanding the uncertainties of decarbonisation of national networks.
42	Applicant	Consider adding monitoring of construction emissions to the commitments register to demonstrate accordance with PAS 2080.
43	Applicant	Amend the wording of R21(1) of the dDCO to ensure that the Carbon Management Plan is submitted and approved prior to the first operation of the proposed WWTP as a whole.
44	Applicant	Provide details of an assessment of the CHP option against the sixth carbon budget trajectories.
45	Applicant	Strengthen the wording in the Carbon Management Plan [AS-076] regarding offsetting and feasibility of this.
46	Applicant	Provide a comparison of the carbon emissions between the existing WWTP and the proposed WWTP.
47	Applicant	Update ES Chapter 10 [REP3-019] to make the significance of effects clearer regarding the impact of the Carbon Management Plan [AS-076].
48	Applicant	Justify / explain why carbon savings are not reported on / monitored during the enabling phase.
49	Applicant	Update the SoCG with Cadent Gas Limited to confirm the potential for a gas to grid connection.
50	Applicant	Address whether the wording of the dDCO allows for alternatives to exporting gas to grid (and whether Work No.9 incorporates such works).
51	Applicant	Address whether alternatives to gas to grid might result in any greater significant effects than those set out in the ES.

Ecology

52	Cambridgeshire County Council	Provide further justification to demonstrate the County's concerns regarding the potential for the Proposed Development to increase visitor pressure on Stow-cum-Quy Fen SSSI.
53	Cambridgeshire County Council	Check the LERMP [AS-066] and confirm whether you have any outstanding concerns regarding mitigation or monitoring of protected species.
54	Cambridgeshire County Council / Applicant	Liaise regarding the LERMP [AS-066] and CEMP [AS-057] to ensure that any outstanding concerns are understood by the Applicant and provide an update.
55	Applicant	Confirm whether any woodland would be affected and if so, whether the CoCP [REP3-026 / REP3-028] appropriately reflects this.
56	Cambridgeshire County Council	Provide wording for the CoCP Part A [REP3-026] to better reflect strategies for mitigating potential invasive non-native species effects.
57	Applicant	Update the CoCP Part A [REP3-026] to refer to the Arboricultural Impact Assessment for the Waterbeach pipeline [REP1-035].
58	Applicant	Update any documents / plans (e.g. Arboricultural Impact Assessments, Design Plans) to reflect the commitment to HDD under all important hedgerows.
59	Applicant	Make provision in the dDCO for any updated 'Biodiversity Net Gain report' to include necessary updated Biodiversity Net Gain metric calculations arising from any subsequent ecological surveys and detailed design.
60	Applicant	Update the Biodiversity Net Gain Report [REP2-020] to reflect R25 of the dDCO and provide a briefing note to explain how R25 would secure net gain.
61	Applicant	Address how any need for a financial obligation for Biodiversity Net Gain under a requirement of the dDCO (R25) would satisfy para. 3.1.6 of NPSWW and associated PPG requirements.
62	Applicant	Provide examples of providers / schemes which could deliver off-site Biodiversity Net Gain for river units and clarification around how this would be delivered. This could be included within the Biodiversity Net Gain Report [REP2-020].
63	Applicant	Amend the word 'following' within R10(8) of the dDCO to 'upon'.
64	Applicant / Cambridgeshire County Council	Liaise on how the detailed design of Works Nos. 32 and 39 would be secured and how habitat creation and reinstatement would work in practice, and provide an update.
65	Applicant	Update the outline Outfall Management and Monitoring Plan [REP2-026] to remove reference to Biodiversity Net Gain.

66	Applicant	Update the dDCO or supporting documents to secure additional CFD modelling of the impact of maximum storm discharges and normal river flow conditions on the riverbank, which would inform the final outfall design.
67	Applicant	<p>To respond to queries regarding impacts on Low Fen Drove Way Grasslands and Hedges County Wildlife Site (CWS) which were not able to be answered during ISH3 due to absence of the Applicant's lead Ecologist:</p> <ul style="list-style-type: none"> • Clarify whether the Applicant considers the operational impacts from light spill onto the CWS to be significant prior to landscaping vegetation establishing. Para. 5.1.9 of ES Chapter 8 [REP2-007] states that this is a significant effect. However, this is not recognised within section 4 of the report or under table 5-1 which details the summary of effects. • Confirm how long the proposed planting set out within ES Chapter 8 would take to establish in order to reduce light spill on sensitive receptors using the CWS (to a level which would not be significant)? • Confirm why the Applicant has not made a commitment to ensure a dark corridor along the disused railway section of the CWS within the Lighting Design Strategy as requested by Cambridgeshire County Council? • Confirm whether there might be any other mitigation measures which could be incorporated to minimise impacts from light spill on the CWS (to reduce the impact to a less than significant effect) at an early stage of the operation of the Proposed Development?
68	Applicant	Update the CoCP Part A [REP3-026] section 7 regarding reptiles to account for double handling.
69	Applicant	<p>Queries regarding protected species which were not able to be answered during ISH3 due to absence of the Applicant's lead Ecologist:</p> <ul style="list-style-type: none"> • the CoCP Part A states under para. 7.2.46 that a Reptile Mitigation Strategy would be produced by the contractor prior to works commencing on site, though this would not require sign off by the Council. Should this be updated to enable the Council to have the opportunity to review the mitigation strategy prior to commencement?

		<ul style="list-style-type: none"> Some RRs (e.g. [RR-138, RR-070, RR-207]) suggest that hares are present within the Order limits. It is unclear whether hares were considered within the Preliminary Ecological Appraisal or ES. Please clarify.
Water Resources		
70	Applicant	Provide justification to demonstrate the suggested benefits of reduced CSOs on the basis that no modelling has been undertaken and clarify what weight could be offered to the stated benefits.
71	Applicant	Address what weight could be afforded to improvements in water quality given that this matter would primarily be controlled through Environmental Permitting and that the Water Framework Directive requires 'no deterioration' rather than improvements to water quality.
72	Applicant	Provide a response to Save Honey Hill Group's D2 responses [REP2-063 and REP2-060] which state that the ES fails to consider adverse impacts on water quality between the existing WWTP outfall and the internal drainage board pumping station for the interim water discharge Environmental Permit.
73	Applicant	Confirm whether the Consents and Other Permits Register [REP1-047] needs updating to refer to a dewatering licence.
74	Applicant	Confirm whether notification of contamination of private water supplies during construction and operation is secured in the application documents and if not, whether it should be.
75	Applicant	Provide an update regarding correspondence with, and any agreement reached with Cambridge Water regarding the water supply to the Proposed Development.
76	CCoC	Clarify whether achieving BREEAM 'excellent' standard would also achieve the maximum number of credits for water efficiency for category Wat 01, or whether this would need to be secured over and above requiring BREEAM 'excellent'.
77	Applicant	Confirm if Best Available Techniques would be used for the Waterbeach pipeline.
78	Applicant	Confirm why the recommendations contained within Section 6.3 of the Preliminary Risk Assessment [REP1-039] are not taken forwards and secured through the dDCO, such as a Foundation Works Risk Assessment and intrusive ground investigation.

79	Cambridgeshire County Council, Cambridge City Council and South Cambridgeshire District Council	Confirm if you consider the outline water quality monitoring plan to be acceptable?
80	Cambridgeshire County Council (as LLFA)	Provide details of any additional sentences / principles you wish to be included within the outline Drainage Strategy, and liaise with the Applicant in this regard.
81	Applicant	Update the SoCG with the internal drainage boards to include letters of no impediment regarding consent for locations for water discharge points along the Waterbeach pipeline route.
82	Applicant / Liz Cotton	Applicant to assess potential for effects on septic tanks around Poplar Hall as a result of the Proposed Development based on information provided by Liz Cotton to the Applicant on locations / details of these.
83	Applicant	Update the Flood Risk Assessment to address concerns identified by the Environment Agency regarding the most recent version and submit the changes to the Environment Agency as soon as possible. Provide an update on the progress of this at D4.
Land Quality		
84	Applicant	Provide an update regarding South Cambridgeshire District Council's suggested requirements relating to land contamination (paras 12.18-12.20 of its LIR [REP2-052]) and how the Applicant intends to address this matter.
Historic Environment		
85	Applicant	Update ES Chapter 13 [REP1-023] page v and para 4.2.20 to specify / correct that temporary construction effects on Baits Bite Lock Conservation Area (HE095) would be moderate adverse, as reported in para 5.2.3 of ES Chapter 13 and in para 6.1.7 of the Planning Statement [REP1-049].
86	Applicant	Make clear in relevant documents or signpost to where it is identified that the significance of effect as identified in the Historic Environment Impact Assessment Tables [REP1-037] are prior to mitigation, as the Applicant stated at ISH3. Following on from this, explain why, if this is the case, a permanent moderate adverse construction effect is

		reported for HE095 (Baits Bite Lock Conservation Area) in Table 1.3 of the Historic Environment Impact Assessment Tables, whereas a slight adverse effect is reported in para 4.2.49 of ES Chapter 13 [REP1-023] relating to permanent construction effects before any mitigation is considered.
87	Applicant	Confirm whether there are any designated heritage assets which would experience less than substantial harm to their significance which have not been reported in ES Chapter 13 (e.g. listed buildings Home Farmhouse GII* (HE013), Lode Cottage GII (HE030), 15 and 17 High Ditch Road GII (HE043), Mulberry House GII (HE045) and Dovecote and Granary to Home Farm GII (HE047), to name a few as identified in the Historic Environment Impact Assessment Tables [REP1-037]).
88	Applicant	Provide a summary table capturing harm to all designated heritage assets as a result of the Proposed Development, the degree of harm and reference numbers for each asset which correspond with the ES. Ensure this is consistent with other relevant documents.
89	Applicant / South Cambridgeshire District Council	Liaise over any potential for further measures to mitigate harm to designated heritage assets, such as Biggin Abbey and Poplar Hall, during construction, and provide an update.
90	South Cambridgeshire District Council	Clarify your view as to the potential for permanent adverse construction effects on Baits Bite Lock Conservation Area, noting that your LIR appears to refer to 'change' and 'impact' in respect of this designated heritage asset.
Landscape and visual / design		
91	Applicant	Confirm what consideration was given during the design process to the potential to reduce the height of taller structures, such as the digesters, gas holder, and heating, pasteurisation and hydrolysis plant by providing a greater number of these (noting that, from the Design Plans, there would appear to be space to do so).
92	Applicant	Provide evidence to demonstrate that the proposed design of the WWTP adopts the minimum heights necessary from an optimisation perspective and to what degree a reduction in height of taller elements (to reduce adverse landscape and visual effects) or a reduction in scale would affect overall function, having regard to para 4.7.16 of NPSWW.

93	Applicant	Provide any comparable examples of established planting on artificially created bunds which do not rely on supplemental watering beyond the establishment period of the first 5 years of planting.
94	Applicant	Incorporate design details of the proposed flare stack and shield into any Design Code and explain why plumes from the boiler stack would never occur.
95	Applicant	Clarification regarding the Arboricultural Impact Assessment for the Waterbeach pipeline [REP1-035], including: <ul style="list-style-type: none"> • what is represented by the pink polygons / lines; • efficacy of protective fencing around T076 given access requirements; and • efficacy of protection of T073 given proposed open cut trenching in this location.
96	Applicant	Update the CoCP to ensure that replacement tree planting would be secured as necessary.
97	Applicant	Ensure that all parameters set out in the relevant schedules to the dDCO [REP3-003] are accurate and reflect the design plans (including in respect of the workshop building which are currently incorrect).
98	Applicant	Provide additional information regarding the minimum height of the proposed bunding, and an explanation for lack of a minimum parameter in this regard within the dDCO [REP3-003].
Green Belt		
99	Applicant / Cambridge City Council	Clarify whether the Green Belt Assessment [APP-207] should make reference to the Cambridge City Local Plan 2018 and whether there would be any Green Belt land affected within the administrative area of Cambridge City Council.
100	Applicant	Provide a note which justifies the approach towards disaggregation of elements of the Proposed Development into inappropriate and not inappropriate development and any policy basis for this, with examples.
Other		

<p>101</p>	<p>Applicant</p>	<p><i>Note: The following matters appeared on the agenda for ISH1, though were discussed as 'Other matters' during CAH1 in the interests of making the best use of time.</i></p> <p>To address matters around inconsistencies in updated documents, including:</p> <ul style="list-style-type: none"> • Environmental Statement (ES) Chapter 2 [REP1-021 and REP1-022] appearing to be updated from a different document to [APP-034]. • ES Chapter 13: Historic Environment clean version [REP1-023] having error references and containing some track changes (paras 4.2.15 and 4.2.60). • Baseline Agricultural Land Classification [REP1-030] having no track changed version and incorrect page numbering. • Para 2.2.1 of the PEA [AS-072] including a broken reference error. <p>To address matters around the errata list and updated documents, including:</p> <ul style="list-style-type: none"> • The ExA's suggestion that it would be preferable / easier for understanding of documents for relevant parts of the errata list to be either appended to relevant documents or documents updated with errata info for the final deadline or as any documents are updated for other reasons prior to this deadline. <p>Matters around any potential missing documents, including;</p> <ul style="list-style-type: none"> • ExQ1.13.18 response suggested updated Book of Figures Historic Environment had been provided at D1 but they do not appear to have been. • Updated Code of Construction Practice Part B was provided at D3 though it is suggested in 'Version History' section on page i that changes were made to pages 3 and 4 but none are apparent. • ExQ1.16.19 response suggested the Code of Construction Practice Part A had been updated at para 5.15.1 to reflect a correct height of 10m rather than 15m. However, this does not appear to be the case. • ExQ1.20.35 response suggested updated Access and Traffic Regulation Order Plans (to incorporate some amendments to sheets 9 and 10) would be provided at D3 but this does not appear to have been provided. • ExQ1.20.10 response suggested a map showing a temporary parking restriction at the Bannold Road junction with Denny End Road / Car Dyke Lane would be provided
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		<p>at D3 but the ExA can not locate this, and it is unclear where Car Dyke Lane is in any event.</p> <ul style="list-style-type: none"> • ExQ1.8.19(2) is partially obscured. • ExQ1.21.29 response states that the outline commissioning plan will be updated to ensure that it aligns with ES Chapter 20 Water Resources paras 4.1.181 – 4.1.184 which sets out measures to be included within the commissioning plan. However, the outline commissioning plan has not yet been updated as stated. <p>Clarification around the Applicant's post hearing submission [REP1-082] Appendix C – Working Timetable, including;</p> <ul style="list-style-type: none"> • Whether it accurately identifies that the remediation of the existing WWTP would occur before commissioning of the proposed WWTP and implications for this if not.
102	Cambridge City Council	Provide a response to IP comments around potential for any future redevelopment of the existing WWTP site and AQMA implications.