

**Cambridge Waste Water Treatment Plant Relocation Project**  
Anglian Water Services Limited

# Applicant's responses to ExA Hearing Actions

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# 1 Introduction

## 1.1 Introduction & Purpose

The Examining Authority issued Action Points for the Compulsory Acquisition Hearing and Issue Specific Hearing 3 – Environmental Matters held between the 9<sup>th</sup> and 11<sup>th</sup> of January 2024. These are as follows:

- EV-006h – Action Points for Compulsory Acquisition Hearing 1 (CAH1); and
- EV-008v – Action Points from Issue Specific Hearing 3 (ISH3).



## 2 Compulsory Acquisition Hearing 1

### 2.1 Hearing Action Point 1

***Consider whether any amendments need to be made to the dDCO in respect of how 'yellow land' is dealt with (in relation to how private rights would be interfered with) insofar as limiting CA powers under Article 26.***

The Applicant has made an amendment to Article 26 (Compulsory Acquisition of Land) of the dDCO which expressly excludes the powers to acquire land, new rights and restrictive covenants in respect of the parcels of land which are shown coloured Yellow on the Land Plans. An amendment has also been made to Article 31 (Private Rights) to confirm that that power applies to land which is in the ownership of the Applicant.

### 2.2 Hearing Action Point 2

***Clarify whether there any other cases where wider benefits enabled by a proposed development but which do not form part of the application have justified the CA of land.***

The Applicant is not aware of any other such DCOs. Please also see the Applicant's response to ExQ1 – 2.18 (REP1-079).

The Applicant notes however that there are many compulsory purchase orders ("CPOs") where the compelling case in the public interest test places weight on wider benefits which will be enabled by the proposed development but which do not form part of the scheme underlying the CPO. This is often the case with Highways Act 1980 CPOs which are required to provide access to and unlock new development sites. For example, The Cheshire East Borough Council and Stockport Metropolitan Borough Council (A523 Poynton Relief Road) Compulsory Purchase Order 2017, which was confirmed in April 2019. A key objective of the scheme was to: *'support the economic, physical and social regeneration of Poynton and the Council's area, particularly Macclesfield'*. The Statement of Reasons accompanying the CPO stated, at paragraph 4.5.1, that: *"the scheme is fundamental to the continued economic development of Poynton, Macclesfield and the surrounding area. The scheme will facilitate the creation of new homes and new jobs, thereby furthering the economic development of the area. The achievement of this depends on the creation of more capacity on the network."* In recommending the confirmation of the CPO, the Inspector placed weight upon the wider public benefits that would be enabled by the CPO Scheme: *"In light of the significant public benefit which would arise to Poynton and the wider area if the scheme were to go ahead[3.26] , it is my view that the Orders would not constitute an unlawful interference with individual property rights. I conclude that any residual interference with human rights would be necessary in order to achieve the scheme and, having regard to the scheme benefits, would be proportionate"* (Paragraph 7.83 of the Inspector's Report dated 27 February 2019).

Similarly, the Department for Levelling Up, Housing & Communities Guidance on Compulsory Purchase Process and the Crichel Down Rules, expressly envisages circumstances in which a CPO may be justified even where there are no specific detailed

development proposals in place, for example a CPO to assemble a cleared and remediated site so as to provide stimulate private sector investment without pre-determining what form of private sector development should take place once the land has been assembled (paragraph 123 of Section 3 of that Guidance).

It is therefore entirely legitimate for a decision-maker, in determining whether or not to authorise compulsory acquisition powers, to have regard to wider public benefits that will be enabled by the proposed development for which the land and rights are to be compulsorily acquired as part of the compelling case in the public interest test.

### 2.3 Hearing Action Point 3

***Clarify the area shown in pink on the map on PDF page 90 of the BNG Report [REP2-020] and identify this in the key (provide updated document and check for other plans which might be affected).***

The BNG Report [REP2-020] has been updated and the revised document has been submitted at Deadline 4. This includes a revised map with all shading removed so as not to cause confusion with shading used on the Land Plans (App Doc Ref 4.4) [REP1-016]. No other plans are affected.

### 2.4 Hearing Action Point 4

***Amend HRA Screening Report [REP2-022] to deal with discrepancy in relation to 8 metre shaft heights referred to on the plan at page 11.***

The HRA Screening Report (App Doc Ref 5.4.8.15) [REP2-022] makes reference to a now superseded design, and which is clarified within the Habitats Regulations Assessment report (App Doc Ref 5.4.8.16) [REP2-024] on page 3, paragraph 1.2.4, which provides design changes since the initial screening was undertaken. The Applicant does not believe that a further update of documents is required.

The Applicant confirms that there will be no permanent air vent structures retained post-construction on Gonville & Caius' land at Poplar Hall Farm.

### 2.5 Hearing Action Point 5

***Details relating to how potential trenching across PRow and Horningsea Road would take place and whether this would result in short-term closures of PRow, bearing in mind the routes of diversions shown on the Rights of Way Plans [REP1-018] run adjacent to / parallel with PRow which cross potential trenching works.***

Article 13 of, and Schedule 6 to, the dDCO deal with the creation, temporary closure and diversion of public rights of way. Article 13(1)(a) states that for those footpaths in Part 1 of Schedule 6, the alignment of the diversion is not fixed but is to be provided between the terminus points. FP85/8 is listed and column 3 of Part 1.

Article 13(2) requires the diverted part of a PRow to be in place before the existing part is closed. This will apply to FP85/8, with a section of the proposed pipelines being installed

before FP85/8 is diverted. The Footpath will then be diverted over the installed section of the pipelines whilst the section on pipelines under the original alignment of FP85/8 is installed. Once this is done, the route of the Footpath will be returned to its original alignment. The diagram provided in Appendix E of this document shows this sequence.

Article 17 of, and Schedule 9 to, the dDCO permit the Applicant to temporarily regulate traffic in order to construct the Proposed Development. This includes the power to prohibit certain vehicular movements, control the direction of road users and restrict access. Sheet 3 of the Access and Traffic Regulation Plans (App Doc Ref 4.7) [AS-154] identifies the location of temporary traffic regulation measures required for the installation of the Final Effluent and Stormflow Pipelines across Horningsea Road.

## 2.6 Hearing Action Point 6

***Update on discussions with the Waterbeach Development Company and SLC Rail (contractor delivering relocated railway station at Waterbeach).***

The Applicant has a good working relationship with the Waterbeach Development Company LLP and discussions continue on a regular basis. The Applicant does not foresee an issue with the overlapping of activities of both projects. As a result, the Applicant does not anticipate the need for a further Change Request.

In terms of negotiations, there are a number of different discussions ongoing on the various topics but there is a meeting scheduled for 29 January 2024 to discuss further. This includes SLC Rail, the contractor appointed by Greater Cambridge Partnership to deliver the new Waterbeach Station, but it should be noted that SLC Rail does not hold a land interest. The Applicant refers to the draft Statement of Common Ground which are as follows.

- Statement of Common Ground: SLC Rail Limited (App Doc Ref 7.14.10) [REP3-048]
- Statement of Common Ground: Waterbeach Development Company LLP (App Doc Ref 7.14.19) [REP3-050]

## 2.7 Hearing Action Point 7

***Define ordering of plot numbers in CA schedule [REP3-013] to aid clarity.***

A revised CA Schedule has been submitted at Deadline 4. The revisions include changes to the format so that plot numbers are categorised to allow the ExA to understand the details more easily.

## 2.8 Hearing Action Point 8

***Add to beginning of the CA Schedule [REP3-013] an explanation of who has and has not been included in the CA Schedule and the reasons for this (and explain why some landowners who have not submitted representations are included such as U and I (Development and Trading) Limited, whereas others are not, such as Ambury Developments Limited).***

An explanation has been provided in Section of the CA Schedule submitted at Deadline 4. That text is as follows.

The Compulsory Acquisition Schedule contains:

- All Category 1 landowners, whether or not they have made a representation in respect of the dDCO, from whom the Applicant requires Compulsory Acquisition of land, Compulsory Acquisition of rights/restrictions, and/or Temporary Possession of land.
- Any other Category 1, 2 or 3 persons who have made a representation in respect of the dDCO.
- All statutory undertakers who have made a representation.

The Compulsory Acquisition Schedule does not include Category 1 lessees, tenants or occupiers who have not made a representation because such persons do not have the legal capacity to convey or grant the necessary land or land rights independently from the landowner and negotiations are therefore taking place in the first instance with the landowner. Engagement has taken place with those parties.

## 2.9 Hearing Action Point 9

***Make the CA Schedule [REP3-013] clearer regarding all of the plots that a particular Affected Person has an interest in.***

A revised CA Schedule has been submitted at Deadline 4. The revisions include changes to the format and additional details to allow the ExA to understand the content more easily.

## 2.10 Hearing Action Point 10

***Review possible additional statutory undertaker interests raised by Margaret Starkie at / in the vicinity of Riverside Cottages.***

Since CAH1, the Applicant has carried out a site visit to the area outside the Riverside Cottages and could not see any evidence of additional statutory undertaker interests within plot 048a as shown on Sheet 9 of the Land Plans (App Doc Ref 4.4.) [REP1-016].

## 2.11 Hearing Action Point 11

***The Applicant Plot 035b is an incorrect reference – update the CA Schedule [REP3-013] accordingly.***

The Applicant can confirm there is not a parcel numbered 035b, and this was inadvertently included on the CA Schedule. It does not appear on the Land Plans nor is it listed in the Book of Reference. It will be removed on the CA Schedule which was submitted at Deadline 4.

## 2.12 Hearing Action Point 12

***The Applicant Address bullet points on CAH Agenda Item 3 Annex A under 'CA Schedule / BoR matters for clarification' regarding the various owners / interests / plots.***

Within the CA Schedule and Book of Reference submitted at Deadline 4, the Applicant has addressed each of the bullet points on CAH Agenda Item 3 Annex A under 'CA Schedule / BoR matters for clarification'.

## 2.13 Hearing Action Point 15

***Confirm if any National Highways land has been compulsorily acquired to facilitate a previous DCO project.***

The Applicant is aware of a number of DCOs where the acquisition of freehold land from National Highways (or Highways England), or from other strategic highway authorities such as Transport for London, has been authorised, or is being sought by promoters. A selection of these is summarised below:

Thames Tideway Tunnel DCO 2014. The order authorised the permanent acquisition of subsoil for the tunnel, together with a protection zone around it. The tunnels pass under the strategic road network, the responsibility for which lies with Transport for London.

The Silvertown Tunnel Order 2018. The order authorised the permanent acquisition of land and subsoil for the tunnel, together with a protection zone around it. The tunnels pass under the strategic road network, the responsibility for which lies with Transport for London.

The Southampton to London Pipeline DCO 2020. This passes under the M3 and the M25 motorways which are part of National Highways' network. The Book of Reference and the Land Plans are no longer available on the Inspectorate's website but the order authorises the acquisition of permanent rights over National Highways' land subject to protective provisions. Those protective provisions do not prevent the exercise of compulsory acquisition powers over National Highways' land.

The Proposed HyNet Carbon Dioxide Pipeline DCO. The promoter is seeking compulsory acquisition over a strata of sub-surface land for the proposed pipeline. The pipeline passes under National Highways' land and strategic road network. National Highways features 104 times in the HyNet Carbon Dioxide Pipeline Book of Reference.

The Proposed Viking CCS Pipeline DCO. The promoter is seeking compulsory acquisition over a strata of sub-surface land for the proposed pipeline. The pipeline passes under National Highways' land and strategic road network. National Highways are featured 62 times in the Viking CCS Pipeline Book of Reference.

The Proposed Yorkshire Green Energy Enablement (GREEN) DCO. National Highways features 114 times in the Book of Reference, with the promoter seeking powers to create new rights, the permanent acquisition of surface interests and temporary occupation of land in relation to land owned by National Highways.

In addition, the compulsory acquisition of subsoil ownership for tunnels under the strategic route network, including that owned by National Highways, is well established by compulsory acquisition powers authorised in special enactments such as the Crossrail Act 2008, and the High Speed Rail Acts 2017 and 2021. Nothing turns on the fact that such powers were authorised in enactments other than development consent orders- the power to compulsorily acquire subsoil under the strategic route network is no different, howsoever authorised.

## 2.14 Hearing Action Point 17

***To clarify the reasons the Applicant considers CA powers to be required for the sub-soil through which the tunnel would run under the A14.***

The Applicant's approach to the compulsory acquisition of a subsoil interest for the Waste Water Transfer Tunnel is entirely consistent with the approach to land acquisition which has been taken by other DCO promoters of tunnels, such as Thames Tideway Tunnel, Silvertown Tunnel, Hynet Carbon Dioxide Pipeline and the Viking CCS Pipeline (as referred to in Action 16 above).

The Applicant considers CA powers are required for the subsoil interest through which the Tunnel would run under the A14 because the tunnel is a strategic waste water treatment asset. As described in paragraph 6.2.12 of the Statement of Reasons (App Doc Ref 3.1) [REP1-009] and discussed with the ExA during CAH1 (see paragraph 3.3.1 of the Applicant's Post Hearing Submission (CAH1 & ISH3)(App Doc Ref 8.21) submitted at Deadline 4), the Waste Water Transfer Tunnel the waste transfer tunnel is a significant, permanent structure which will remain underground in perpetuity. Consistent with other significant tunnel infrastructure projects, the Applicant seeks the acquisition of subterranean strata of land with a restrictive covenant to protect it. The Tunnel structure and associated infrastructure will be a substantial asset. In the interests of affording appropriate protection, subsoil transfers are an industry standard mechanism for documenting land rights in respect of significant infrastructure of this size. This has the following specific advantages for the Applicant compared with the acquisition of new rights.

The Applicant will have exclusive possession of the relevant area of land and can exclude third parties from it. This is necessary for safety reasons and to ensure the integrity of the asset, including to protect against trespass into the land in which the Tunnel is situated and the protective layer around it. New rights, on the other hand, will often allow for shared use of the land and the Applicant's ability to exclude the landowner; prevent third party activity; and or to take enforcement action is very limited.

Deeds of easement will often contain lift and shift provisions under which the landowner can require relocation of the apparatus in order to facilitate development. This is not appropriate in the context of major infrastructure because of the engineering and cost



implications of relocating the apparatus. A subsoil transfer avoids this issue and provides certainty for all parties.

The Applicant's interest will be registrable at the Land Registry. The land will have its own title number, making it easier for third parties to identify the location and the ownership of the asset, thereby ensuring that anyone with proposals for development or engineering operations in the vicinity will be aware of the existence of the tunnel.

As the Applicant will be the owner of the land, it will have a greater degree of control over its asset which is important for maintenance of the apparatus, for protection from other development or engineering operations (such as conflicts with other proposed underground infrastructure), and to protect the integrity of the apparatus. Ownership of the land in which the tunnel is situated also provides the Applicant with a clear means of enforcement in the event that trespass occurs.

Only a sub-strata of land is proposed to be acquired by the Applicant, and no more than is necessary to contain the tunnel and a protective layer around. The proposed means of acquisition with therefore leave the benefit of the freehold title of the land above and below with National Highways, to allow it to perform its statutory function without hinderance.

National Highways has not identified the serious detriment (indeed any detriment) to its undertaking which would be caused by the acquisition of sub-strata of land at a depth of between 7m-20m below the surface. Nor has it identified any detriment which would be caused by the construction or the existence of the tunnel itself under the strategic road network which cannot be addressed by the proposed protective provisions.

National Highways' objection, based on its oral submissions in CAH1, appears to relate solely to the acquisition of subsoil and/or rights under its strategic network road. To suggest that the Applicant should commit substantial expenditure on the waste transfer tunnel, which will become a critical part of its undertaking, and then for the Applicant to not be able to protect its operational asset with land rights to ensure it remains operational, is not a credible position. National Highways would not accept the same in relation to its own assets, see for example the A303 Stonehenge DCO 2023 which authorises National Highways' compulsory acquisition of subsoil for the bored tunnel, with a 'layer' of additional subsoil around the tunnel itself, together with new rights and restrictions which will create a protection zone around it.

The Applicant is willing to give protective provisions in the dDCO to ensure that National Highways' operational functions are protected, and the Applicant submits that the tests in section 127 of the Planning Act 2008 are met.

## 2.15 Hearing Action Point 19

***Include statutory undertakers who have objected / made representations in the CA Schedule [REP3-013].***

Statutory undertakers who have objected / made representations have been included by the Applicant in the CA Schedule submitted at Deadline 4.

## 2.16 Hearing Action Point 20

***The CA Schedule's [REP3-013] 'Status of Objection' column is not filled out in a number of cases (e.g. CA025 onwards). Review and add clarification as appropriate.***

The Applicant has reviewed the 'Status of Objection' column on the CA Schedule and added clarification where appropriate on the version of the CA Schedule submitted at Deadline 4.

## 2.17 Hearing Action Point 21

***Re-format Statutory Undertakers' Progress Schedule [REP3-015] to reduce number of word breaks for ease of reading.***

The Applicant has re-formatted the Statutory Undertakers' Progress Schedule [REP3-015] to reduce the number of word breaks for ease of reading. A revised Statutory Undertakers Progress Schedule has been submitted at Deadline 4.

## 2.18 Hearing Action Point 22

***Update Crown Land Plans legend [REP1-017] to identify which Crown authority has interests in which plots.***

The Applicant has updated the Crown Land Plans to identify which Crown authority has interests in the relevant plots. The revised Crown Land Plans have been submitted at Deadline 4.

## 2.19 Hearing Action Point 23

***Provide most recent company accounts and update Funding Statement [APP-013] accordingly.***

The Funding Statement [APP-013] has been updated at paragraph 2.2.14 to include the relevant details from the Applicant's most recently available company accounts. In addition, a copy of those accounts has been included at Appendix 3 of the Funding Statement submitted at Deadline 4.

## 2.20 Hearing Action Point 24

***Update Funding Statement [APP-013] at para 3.1.7 to reflect that future additional treatment capacity funding (£22.5m) has been ringfenced by the Applicant's Board, as referred to in response to ExQ1.8.27 [REP1-079].***

The Applicant has updated the Funding Statement [APP-013] at paragraph 3.1.7 to confirm that the Applicant's Board has approved the ringfencing of the £22.5 million funding for the future additional capacity at the proposed new WWTP relating to Waterbeach.



## 3 Issue Specific Hearing 3 – Environmental Matters – Traffic & Transport

### 3.1 Hearing Action Point 1

***Provide your definitive position on mounted equestrian use of the A14 overbridge.***

We are providing an increased parapet height on the bridge to 1.8m to facilitate equestrian use of the A14 overbridge. The principle of this is agreed with National Highways and the Highway Authority. Further detail will be agreed through detailed design.

### 3.2 Hearing Action Point 2

***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).***

The Applicant has carried out a review of the DCO applicant for any potential inconsistencies in parameters, this review is provided with the covering letter and includes a review of the trigger level for tall structure heights which triggers a need for the Applicant to consult Cambridge City Airport, any inconsistencies have been correct and the documents submitted as part of this deadline.

### 3.3 Hearing Action Point 4

***National Highways and The Applicant to liaise on traffic and transport matters to enable comprehensive submissions / responses to be made at D4.***

The Applicant met with National Highways on 16 January 2024 to review and confirm points of agreement and review the management plans. The Statement of Common Ground has been updated to reflect the points agreed from this meeting and was sent to National Highways on 17 January 2024. National Highways has committed to responding to this updated version by 19 January 2024 so that a copy is submitted at Deadline 4 by both the Applicant and National Highways to reflect the joint position. The Applicant forwarded on 10 January 2024 a detailed list of all the points required for resolution in relation to Land Acquisition raised in CA1. The Applicant is awaiting a response to this list from National Highways. National Highways have given the Applicant the meeting date of 23 January 2024 as their first available date for the further discussion on the Protective Provisions.

### 3.4 Hearing Action Point 9

***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).***

The Applicant has revised ES Appendix 19.7 Construction Traffic Management Plan (App Doc Ref 5.4.19.7) and submitted at Deadline 4 to reflect the revised restrictions as agreed with CCoC for the sites on Cowley Road, Fen Road, Burgess's Drove and Bannold Drove for vehicles over 3.5 tonnes. These revised times are as set out in the CCoC LIR [REP1-133] and agreed at the meeting held on 19 December 2023 and the ISH3.

- Cowley Road and Fen Road – 09:30 to 15:30.
- Bannold Drove and Burgess Drove – 09:30 to 15:00 during school term time.

For all other site access points, the general mitigation measures ES Appendix 19.7 Construction Traffic Management Plan (App Doc Ref 5.4.19.7) to plan construction vehicle deliveries outside the peak times of 08:00 to 09:30 , 15:30 to 18:00 will apply, to align with discussions with CCoC.

The Applicant notes that in section 3 of ES Appendix 19.7 Construction Traffic Management Plan (App Doc Ref 5.4.19.7), part of the role of the Logistics Manager is to update the CTMP as required and be the link with Construction Forum and Community Liaison Officer ensuring that mitigation times can be adjusted over the course of the construction should this be required to mitigate changing traffic patterns.

The Applicant will provide an updated Transport Assessment and ES Chapter 19: Traffic and Transport that addresses these matters for Deadline 5.

### 3.5 Hearing Action Point 10

***Seek response from emergency services in respect of emergency vehicle access to roads which form part of construction traffic routes.***

The Applicant held a combined Emergency Services Technical Working Group on 18 September 2023 and discussed and reviewed the site access options during construction and operation and the other planned construction routes. The Emergency Services consider the proposals are appropriate and the agreement is reflected in the combined Statement of Common Ground.

### 3.6 Hearing Action Point 11

To provide a schedule which sets out in relation to each transport mitigation plan:

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: trigger points; monitoring provisions; and mitigation provisions.

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.

The Applicant has appended the schedule at **REP 4 8.20 Appendix G** which sets out the current position for each transport mitigation plan.

### 3.7 Hearing Action Point 12

***Confirm which activities are 'time critical' with reference to page 20 of [REP2-036].***

In the context of construction, "time critical" activities would involve staff traveling to / from work or office that are working on a time critical activity, deliveries of plant and materials, deliveries of equipment and deliveries of liquid sludge imports.

In the context of operation, time critical activities would involve operational and maintenance staff travelling to / from work due to failures or unforeseen events, as well as non-routine tanker movements due to failures or unforeseen events.

### 3.8 Hearing Action Point 13

***Add an AIL route map to the CTMP showing the route that AIL would be restricted to.***

The Applicant will revise ES Appendix 19.7 Construction Traffic Management Plan (App Doc Ref 5.4.19.7) to include the AIL route map and submit it at Deadline 5.

### 3.9 Hearing Action Point 14

***Provide evidence in relation to the appropriateness of routes in Waterbeach for HGVs associated with the construction phase.***

A response to this is provided in Appendix F of this document.

### 3.10 Hearing Action Point 15

***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.***

A drawing which demonstrates that there is sufficient space to act as exclusion zone has been provided in Appendix J of this document.

### 3.11 Hearing Action Point 16

***Clarify reference at 4.2.244 of [REP3-022] to Bannold Road junction with Denny End Road / Car Dyke Lane.***

This should be Denny End Road / Bannold Road / High Street as per Sheet 10 of Access and Traffic Regulation Plans (App Doc Ref 4.7) [AS-154]. The reference to Car Dyke Lane in paragraph 4.2.24 of ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) will be removed and corrected to Denny End Road / Bannold Road / High Street. Other references to Car Dyke Lane in ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19), such as the A10/Car Dyke Lane junction, will also be corrected to A10/Car Dyke Road.

These changes will be included in the updated ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) submitted at Deadline 5.

### 3.12 Hearing Action Point 17

***Explain why there is an apparently absolute commitment to not direct any construction traffic through Horningsea.***

The Applicant, as a result of the detailed feedback received from Fen Ditton and Horningsea Parish Council during phase two consultation, committed to, Construction traffic not travelling through Horningsea or Fen Ditton. The feedback included detail regarding the unsuitability of the local network for heavy goods traffic and safety concerns for non motorised users.

This was confirmed in the Phase Two consultation summary report and communicated by the Applicant in the Community Working Groups of 13 December 2021 and finalised in the Community Working Group meeting held on 13 January 2022, where the Applicant confirmed that the following highway mitigation would be given and secured through the Construction Traffic Management Plan and Operational Traffic Management Plan:

1. Construction traffic and operational HGV traffic associated with the project will not travel through Horningsea or Fen Ditton.
2. All HGV's will be prohibited from using Horningsea Road north of Low Fen Drove Way.
3. Only limited construction HGV traffic necessary to build the transfer pipeline will use Horningsea Road South of Junction 34 of the A14, it will turn off prior to the village

At Consultation Phase 3 the Applicant committed to no vehicles being allowed to travel into Fen Ditton or turn right towards Horningsea from the proposed WWTP site access, this

commitment was made in the Outline Construction Traffic Management Plan which was included as part of the PEIR.

### 3.13 Hearing Action Point 19

***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.***

The Community Liaison Plan (Section 5.1) (App Doc Ref 7.8) has been updated to make specific reference to construction access route changes as being included in the engagement approach. The Applicant has left the wording general rather than specific so it relates to any changes rather than specific to Waterbeach.

The Construction Traffic Management Plan (App Doc Ref 5.4.19.7), Section 4.1 has been updated and includes signposting to the Community Liaison Plan as this is where community communications are secured for the construction phase of the Proposed Development.

Any impact of the above changes on ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) will be reflected in the version submitted at Deadline 5.

### 3.14 Hearing Action Point 21

***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.***

The Applicant is a member of the Waterbeach Community Forum and has asked for this item to be added to the Agenda for the next quarterly meeting and to present details. The Applicant has provided contact details to Cllr Jane Williams to facilitate the navigation of project documentation and the Applicant and the relevant members of the Anglian Water Waterbeach pipeline project team will attend further Parish Council meetings if this is helpful.

### 3.15 Hearing Action Point 23

***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).***

The Applicant can confirm the document has been checked for general typographic, headings, table descriptions, etc. to remove discrepancies and is in the process of being updated to address the issues noted at ISH3 and consequential issues.

Additionally the Applicant's operational parking requirements- have been updated and the modelling and assessment for the operational year is being reviewed and updated.

The Applicant will provide an updated ES Appendix 19.3 Transport Assessment (App Doc Ref 5.4.19.3) and ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) that addresses all these matters for Deadline 5.

### 3.16 Hearing Action Point 24

***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.***

The Applicant will review the Junction 34 capacity analysis for the peak, pre-peak and post-peak periods as requested and provide modelling outputs to illustrate both pre-peak and post-peak to demonstrate the differences reported are of the nature and scale indicated so this can be verified for the ExA and that the mitigation proposed in the CTMP is sufficient address these impacts.

With reference to REP1-134, 20.85 CCoC and the Applicant are aligned with the aim to reduce peak hour construction movements. This is reflected agreements to modify the peak hours restrictions in the CTMP as confirmed in the ISH3 and as updated in ES Appendix 19.7 Construction Traffic Management Plan (App Doc Ref 5.4.19.7) provided at Deadline 4.

The Applicant will provide an updated ES Appendix 19.3 Transport Assessment (App Doc Ref 5.4.19.3) and ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) that addresses these matters for Deadline 5.

### 3.17 Hearing Action Point 25

***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.***

The periods for assessment were agreed with CCoC through the Traffic Working Groups and are set out in the Appendix B (Scoping Note) of the Transport Assessment (App Doc Ref 5.4.19.3) [REP3-034].

Notwithstanding that agreement and as set out in the Applicant's response to Action Point 24, the Applicant will review the Junction 34 capacity analysis for the peak, pre-peak and post-peak periods as requested and provide modelling outputs to illustrate both pre-peak and post-peak to demonstrate the differences reported are of the nature and scale indicated so this can be verified for the ExA and that the mitigation proposed in the CTMP is sufficient address these impacts.

### 3.18 Hearing Action Point 27

***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?***

The operational traffic flow associated with the proposed WWTP during the peak hour represents a small increase on the total peak hour traffic flow, in the region of 1%.

The operational assessment for the Proposed Development assumes that there is no mode change by employees and that all trips for staff and deliveries for the WWTP occur in the peak hour. So the Applicant believes that the mitigation measures would be unlikely to be required due to the low volume of traffic generated and the background traffic growth assuming is not affected by the measures put in place to reduce it.

Notwithstanding this, the OLTP and OWTP will be developed into detailed plans post-consent in line with their respective Requirements in the draft DCO (App Doc Ref 2.1) and will include mechanism for periodic monitoring and review through which the Applicant will be able to introduce, if required, additional mitigation measures to be agreed with CCoC.

The Applicant will provide an updated ES Appendix 19.3 Transport Assessment (App Doc Ref 5.4.19.3) and ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) that addresses all these matters for Deadline 5.

### 3.19 Hearing Action Point 28

***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'.***

The Applicant has amended the draft DCO to make this change. This can be seen in the draft DCO submitted at Deadline 4.



### 3.20 Hearing Action Point 31

***In relation to vehicle parking:***

- ***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.***

The development will provide 68 car parking spaces which comprises 46 staff car parking spaces at the Discovery building, 12 visitor car parking spaces at the Gateway building and 10 car parking spaces for operation vehicles. This level of provision is in accordance with SDC policy TI/3 which would allow up to 76 car parking spaces for a development of this size.

The Transport Assessment assesses all vehicles movements associated with staff and operational HGV movements which would routinely occur during the AM and PM peak hours. It does not assess vehicle movements associated with the Gateway building as this would not be operational in the peak hours and it does not assess operational car/van movements as these are primarily concentrated in the off peak periods.

In light of the ExA request, the Applicant will undertake a sensitivity test that assesses the impact of all staff, visitor and operational vehicle movements associated with the proposed development occurring in the AM and PM peak hours.

The Applicant will provide an updated ES Appendix 19.3 Transport Assessment (App Doc Ref 5.4.19.3) and ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) that addresses all these matters for Deadline 5.

### 3.21 Hearing Action Point 32

***In relation to existing and future staff numbers, ensure that all references in the application documentation are correct and consistent.***

A consistency check has been carried out and figures have been updated within the DCO application to reflect existing and future staffing figures.



### 3.22 Hearing Action Point 33

***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.***

The Applicant will submit an updated version of the PADS [REP2 –032] at Deadline 4 to show this correction.

## 4 Issue Specific Hearing 3 – Environmental Matters – Carbon

### 4.1 Hearing Action Point 35

***Submit the Design Code referenced under R7 of the dDCO which should secure / clarify the following:***

- ***The Proposed Development would achieve BREEAM 'excellent' standard; and***
- ***How the dDCO would allow for design refinement, monitoring and review of carbon emissions.***

The Design Code has a code specifically for the attainment of BREEAM excellent

#### PER.01

**The Gateway Building and the Workshop Building should achieve a BREEAM Excellent Rating, in line with local planning requirements.**

### 4.2 Hearing Action Point 36

***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:***

- ***CHP option / DMO baseline; and***
- ***Baseline for operational carbon emissions of the existing WWTP.***

The Applicant has provided an update to ES Chapter 10: Carbon (App Doc Ref 5.2.10) that provides:

- An updated description regarding both the Construction and Operational Carbon baselines being a “do-nothing” baseline and the DMO design being presented as an alternative design stage to demonstrate the mitigation efforts made by the Applicant to reduce construction carbon emissions impact of the Proposed Development.
- A presentation of the operational carbon emissions of the existing site as a baseline for Operational Carbon in line with a “do-nothing” position.
- Presentation of the CHP option against an interpretation of alignment to reductions implied by the Sixth Carbon budget to demonstrate alignment with its balanced net zero pathway.
- Updated to Section 5 on mitigations to reference the new Design Code, which looks to secure the capital carbon reductions proposed in ES Chapter 10: Carbon (App Doc Ref 5.2.10), alongside the Outline Carbon Management Plan (App Doc Ref 5.4.10.2) that already secures the operational net zero carbon commitment.

### 4.3 Hearing Action Point 37

***Clarify any cumulative carbon effects in relation to the Waterbeach pipeline construction and in respect of pumping operations.***

The Applicant reiterates that the pumping station to be connected to the Waterbeach pipeline is outside of the boundary of the DCO. Whilst the Applicant acknowledges there will be emissions impact from the construction and operation of the Waterbeach pipeline pumping station, these would be small in nature to the Proposed Development and would not have a cumulative local impact.

### 4.4 Hearing Action Point 38

***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.***

The Applicant can confirm that this value was from the Applicant's 2020 reported figures.

### 4.5 Hearing Action Point 39

***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).***

The Applicant has provided an updated ES Chapter 10: Carbon (App Doc Ref 5.2.10) at Deadline 4 to clarify this in Paragraph 4.6.1 and in Table 4-10.

### 4.6 Hearing Action Point 40

***Clarify why sludge deliveries are not included in the carbon assessments.***

The Applicant has provided a clarification paragraph 2.7.4 in the updated ES Chapter 10: Carbon (App Doc Ref 5.2.10) to highlight the exclusion of any operational emissions sources that are considered to remain unchanged between the existing site and the Proposed Development, including sludge deliveries. This is in line with the request for a comparison against a baseline of the existing site's operational emissions.

### 4.7 Hearing Action Point 41

***Address decarbonisation of the gas grid within the carbon assessments, notwithstanding the uncertainties of decarbonisation of national networks.***

The Applicant has provided additional commentary within the updated ES Chapter 10: Carbon (App Doc Ref 5.2.10) in paragraph 5.1.7 to the extent to which the gas grid would need to decarbonize from its current carbon intensity to prevent the Proposed

Development from being considered operationally net zero. It also provides additional commentary of the alignment to the UK Energy Security Plan.

## 4.8 Hearing Action Point 42

***Consider adding monitoring of construction emissions to the commitments register to demonstrate accordance with PAS 2080.***

The Applicant does not have a mechanism to provide near real time monitoring of ongoing construction works, but will rely on the Construction Management Plan and other plans to ensure good practice is followed in line with what has been allowed for within its carbon model. The Applicant will provide an update to its carbon model to account for any changes, including efficiencies or increases in emissions in a final as-built carbon model and will provide interim updates at the following points:

- 6 weeks prior to enabling works commencing.
- Commencement of the main construction works
- Finalisation of the Detailed Design
- At any stage where decisions are made which impact Capital Carbon emissions of the Proposed Development by more than 5%.

## 4.9 Hearing Action Point 43

***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.***

The Applicant has amended the draft DCO to make this change. This can be seen in the draft DCO submitted at Deadline 4.

## 4.10 Hearing Action Point 44

***Provide details of an assessment of the CHP option against the sixth carbon budget trajectories.***

Presentation of the CHP option against an interpretation of alignment to reductions implied by the Sixth Carbon Budget to demonstrate alignment with its balanced net zero pathway has been provided in Figure 4.11 of the updated ES Chapter 10: Carbon (App Doc Ref 5.2.10) submitted at Deadline 4.

## 4.11 Hearing Action Point 45

***Strengthen the wording in the Carbon Management Plan [AS-076] regarding offsetting and feasibility of this.***

The Applicant has provided text updates to the Carbon Management Plan (CMP) (App Doc Ref 5.4.10.2), in paragraph 4.14, 4.16 and 5.3.1. To strengthen the wording of around the

commitment and feasibility of identifying sufficient offsets to meet the Applicants operational net zero target.

The Applicant has also provided additional clarity in the updated ES Chapter 10 (App Doc Ref 5.2.10), around the certainty of impact of the mitigations secured through the CMP.

#### 4.12 Hearing Action Point 46

***Provide a comparison of the carbon emissions between the existing WWTP and the proposed WWTP.***

The Applicant has provided this within the updated ES Chapter 10: Carbon (App Doc Ref 5.2.10) submitted at Deadline 4.

#### 4.13 Hearing Action Point 47

***Update ES Chapter 10 [REP3-019] to make the significance of effects clearer regarding the impact of the Carbon Management Plan [AS-076].***

The Applicant has provided this within the updated ES Chapter 10: Carbon (App Doc Ref 5.2.10) submitted at Deadline 4.

#### 4.14 Hearing Action Point 48

***Justify / explain why carbon savings are not reported on / monitored during the enabling phase.***

The Applicants clarifies that it will continue to report updates to its carbon model through to the finalization of its design and a final as-built carbon model will be provided at the conclusion of construction works. This would include any design or construction approach updates that would result in carbon savings during the enabling phase. This includes an update to the carbon model design at:

- 6 weeks prior to enabling works commencing.
- Commencement of the main construction works
- Finalisation of the Detailed Design
- At any stage where decisions are made which impact Capital Carbon emissions of the Proposed Development by more than 5%.

These updates are secured through the Design Code. The Applicant does not have a mechanism to provide near real time monitoring of ongoing construction works but will rely on the Construction Management Plan and other plans to ensure good practice is followed in line with what has been allowed for within its model.

## 4.15 Hearing Action Point 49

***Update the SoCG with Cadent Gas Limited to confirm the potential for a gas to grid connection.***

The Applicant has made this amendment to the SoCG with Cadent Gas (App Doc Ref 7.14.1) and a copy forwarded to Cadent Gas for final agreement and signature.

## 4.16 Hearing Action Point 50

***Address whether the wording of the dDCO allows for alternatives to exporting gas to grid (and whether Work No.9 incorporates such works).***

As described in the reasons to Hearing Action Point 51 below the alternatives to gas to grid (other than CHP) would likely require additional infrastructure beyond that described in Work No.9 (although the infrastructure described in Work No 9 would still be relevant to those alternatives). This additional infrastructure would only fall within the scope of Further Works described in the dDCO if they fall within the scope of work considered by the ES (which the Applicant does not consider is the case). Separate consent for that infrastructure would therefore be needed outside of the DCO if those alternatives were to be pursued.

## 4.17 Hearing Action Point 51

***Address whether alternatives to gas to grid might result in any greater significant effects than those set out in the ES.***

The Applicant has not undertaken a full quantified assessment of alternatives to gas to grid that it would consider if that option were not considered viable in the future. The alternatives discussed have been:

- Compression of biomethane to CNG for use as transport fuels: This would require additional compression equipment on site and may potentially result in a small increase in operational emissions related to transporting the CNG to its end use location.
- Use of biomethane as a transport fuel source for AWS fleet: This would also require some small scale infrastructure and operationally would reduce the carbon impact of vehicles in and around the site

Under both scenarios the gas continues to replace fossil fuels, whether that be diesel from transport or natural gas for industrial demand and generates a carbon avoidance benefit. The argument that a renewable fuel source may become obsolete becomes circular in nature, as it assumes decarbonisation of current infrastructure, such as the gas grid, will occur without the type of scheme being proposed. It should be noted that neither of the above options are planned and the Applicant has engaged to ensure the feasibility of the biomethane to grid export option.

Regarding significant effects the additional infrastructure required for these alternative options would not change the capital carbon impact assessment of adverse moderate rated significant. For operational carbon if these alternatives were required the Carbon Management Plan (CMP) would require these emissions to either be decarbonized or offset through securing additional offsets to enable to Proposed Development to continue to claim operational net zero status, as per the Applicants commitment. This would be tracked through the annual reporting of operational emissions, as required by the CMP. Therefore, the operational carbon significance of effects would also not be impacted.

## 5 Issue Specific Hearing 3 – Environmental Matters – Ecology

### 5.1 Hearing Action Point 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.***

The Applicant is in discussions with CoCC to identify dates for review of these two matters. Potential dates for this further review are awaited from CoCC.

### 5.2 Hearing Action Point 55

***Confirm whether any woodland would be affected and if so, whether the CoCP [REP3-026 / REP3-028] appropriately reflects this.***

The Applicant provided an Appendix J in the responses to ExQ1 5.24 (App Doc Ref 8.3) [REP1-080], which notes that for the Waterbeach transfer pipeline and transfer tunnel, there are temporary losses during construction due to access routes in relation to lowland mixed deciduous woodland; and temporary loss during construction due to open-cut laying of pipelines and access routes in relation to other woodland; broadleaved habitat. These locations will be reinstated post-construction. With respect to the proposed WWTW (including the Outfall), the woodland (other woodland; broadleaved) will be retained and enhanced. The decommissioning works for the existing WWTW will not impact upon any woodland habitats.

The CoCP Part A (App Doc Ref 5.4.2.1) [REP3-026] includes measures to minimise impacts on trees and hedgerows (paragraph 7.2.63-7.2.69 within the submission for Deadline 4) and reinstatement of habitats (paragraphs 7.2.70-7.2.76 within the submission for Deadline 4).

### 5.3 Hearing Action Point 57

***Update the CoCP Part A [REP3-026] to refer to the Arboricultural Impact Assessment for the Waterbeach pipeline [REP1-035].***

The Applicant has updated section 7.2, Ecology and Nature Conservation, of the CoCP Part A (App Doc Ref 5.4.2.1) to refer to the Arboricultural Report for Waterbeach (App Doc Ref 5.4.8.19).

### 5.4 Hearing Action Point 58

***Update any documents / plans (e.g. Arboricultural Impact Assessments, Design Plans) to reflect the commitment to HDD under all important hedgerows.***



The Applicant has updated section 3.4, Waterbeach pipeline, of the CoCP Part B (App Doc Ref 5.4.2.2) to refer to the measure for trenchless construction to avoid an important hedgerow. The Design Plans are indicative and final versions showing the exact HDD locations will be provided in order to discharge Requirement 7 of the draft Development Consent Order (App Doc Ref 2.1). The Applicant has updated the Hedgerow Regulations and Tree Preservation Plans (App Doc Ref 4.8) to reflect that the hedgerow will be retained.

## 5.5 Hearing Action Point 59

***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.***

The Applicant has updated the wording of Requirement 25 of the dDCO (App Doc Ref 2.1) and submitted at Deadline 4 to include specific reference that the updated Biodiversity Net Gain (BNG) report will include, where necessary (due to subsequent surveys and detailed design), an updated biodiversity metric calculation.

*25- (1) No phase of the authorised development is to be commenced until an updated biodiversity net gain report has been submitted to and approved by the relevant planning authority.*

*(2) The updated biodiversity net gain report submitted for approval must include:*

*(a) how the measures contained within it deliver and secure twenty percent biodiversity net gain for the whole of the authorised development excluding any biodiversity net gain to be provided as river units;*

*(b) details of measures to deliver and secure twenty percent biodiversity net gain comprising river units within or outside of the Order limits;*

*(c) details of the habitat management and monitoring of the biodiversity net gain for the whole of the authorised development; and*

*(d) an updated biodiversity metric calculation or an explanation of why a biodiversity metric calculation is not necessary.*

*(3) The updated biodiversity net gain report may be revised from time to time in accordance with requirement 6.*

*(4) The construction and operation of the authorised development must be carried out in accordance with the approved updated biodiversity net gain report.*

*(5) For the purposes of this requirement, biodiversity metric calculation means a calculation in accordance with the metric in Appendix D of the biodiversity net gain report.*

## 5.6 Hearing Action Point 60

***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.***

The Applicant has updated ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13 and submitted at Deadline 4 to reflect the inclusion of Requirement 25 within the dDCO (App Doc Ref 2.1).

The Applicant has provided the Briefing Note in Appendix B of this document, which explains how Requirement 25 secures BNG.

## 5.7 Hearing Action Point 61

***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.***

During the hearing, the Examining Authority asked how Requirement 25 would be lawful with regards to paragraph 3.1.6 of the National Policy Statement on Waste Water (“NPSWW”) in the context of securing any financial obligations. For ease of reference, the relevant extract from the NPSWW is set out below:

The decision maker should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects. Guidance in Circular 11/95, as revised, on “The Use of Conditions in Planning Permissions” or any successor to it should be taken into account.

Circular 11/95 referred to above has been superseded by Planning Practice Guidance: Use of Planning Conditions.<sup>1</sup> The following paragraphs are of particular relevance to the issue at hand:

- Paragraph 55 (now paragraph 56 in NPPF 2023) of the National Planning Policy Framework makes clear that planning conditions should be kept to a minimum, and only used where they satisfy the following tests:
  - necessary;
  - relevant to planning;
  - relevant to the development to be permitted;
  - enforceable;
  - precise; and
  - reasonable in all other respects.

These are referred to in this guidance as the 6 tests, and each of them need to be satisfied for each condition which an authority intends to apply.

<sup>1</sup> <https://www.gov.uk/guidance/use-of-planning-conditions#Application-of-the-six-tests>

Paragraph: 003 Reference ID: 21a-003-20190723

- No payment of money or other consideration can be positively required when granting planning permission. However, where the 6 tests will be met, it may be possible use a negatively worded condition to prohibit development authorised by the planning permission until a specified action has been taken (for example, the entering into of a planning obligation requiring the payment of a financial contribution towards the provision of supporting infrastructure).

Paragraph: 005 Reference ID: 21a-005-20190723

The Applicant also notes the draft planning practice guidance on biodiversity net gain which states:

‘It is not appropriate to use planning conditions to secure funding for delivering or monitoring biodiversity net gain. These should be secured through section 106 planning obligations where justified.’<sup>2</sup>

The Applicant based the drafting of Requirement 25 upon the wording to be inserted into the Town and Country Planning Act 1990 at Schedule 7A, Part 2, paragraph 13<sup>3</sup> which provides as follows:

- **General condition of *planning permission***
  - 13(1)Every planning permission granted for the development of land in England shall be deemed to have been granted subject to the condition in sub-paragraph (2).
  - (2)The condition is that the development may not be begun unless—
    - (a)a biodiversity gain plan has been submitted to the planning authority (see paragraph 14), and
    - (b)the planning authority has approved the plan (see paragraph 15).
- ***Biodiversity gain plan***
  - 14(1)For the purposes of paragraph 13(2)(a), a biodiversity gain plan is a plan which—
    - (a)relates to development for which planning permission is granted, and
    - (b)specifies the matters referred to in sub-paragraph (2).
  - (2)The matters are—

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<sup>2</sup> <https://www.gov.uk/guidance/draft-biodiversity-net-gain-planning-practice-guidance>

<sup>3</sup> As inserted by the Environment Act 2021 (c. 30), s. 147(3), Sch. 14 para. 2 (with s. 144); S.I. 2023/1170, reg. 2(d)

- (a) information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat,
- (b) the pre-development biodiversity value of the onsite habitat,
- (c) the post-development biodiversity value of the onsite habitat,
- (d) any registered offsite biodiversity gain allocated to the development and the biodiversity value of that gain in relation to the development,
- (e) any biodiversity credits purchased for the development, and
- (f) such other matters as the Secretary of State may by regulations specify.

As per the condition in Schedule 7A, Requirement 25 secures the provision of a report which confirms how biodiversity net gain will be secured and delivered. The wording does not secure a particular mechanism for the delivery of biodiversity net gain, be that a financial contribution, the purchase of offsetting credits or any other method. That detail will be contained in an updated biodiversity net gain report which must be approved by the relevant planning authority prior to the commencement of any phase of the authorised development.

Further, the Requirement does not require the payment of money or any other consideration as a pre-condition of the discharge of the condition, but, in accordance with Planning Practice Guidance, it is a negatively worded requirement which prohibits the development until a specified action has been taken (i.e. the provision of the updated report).

If the relevant planning authority does not approve the biodiversity net gain report, the development would not be able to proceed lawfully, unless the Applicant successfully appealed the planning authority's decision. Pursuant to Requirement 25(4), the construction and operation of the authorised development must be carried out in accordance with the approved, updated report.

By way of example, should the Applicant require a section 106 agreement in order to secure the delivery of biodiversity net gain, whether or not this contains an obligation to make a financial contribution, this will need to be provided as part of the submission of the updated biodiversity net gain report. This is because that report must detail the measures for both securing and delivering the net gain. However, the section 106 agreement will be the mechanism for the payment of the contribution, not the report provided pursuant to Requirement 25. Direct enforcement of the payment of the financial contribution would be through the Section 106 agreement.

## 5.8 Hearing Action Point 62

***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].***

The Applicant is continuing to explore off-site river unit opportunities. A record of the outcome of discussions with off-site opportunities will be set out in the Statement of Common Ground with the relevant planning authority. This was previously commented on in Response to Relevant Representations (App Doc Ref 8.2 [REP1-078]) 36 and 37 to South Cambridgeshire District Council.

The agreed off-site river unit provider and details of the proposals will be included in the updated Biodiversity Net Gain Report (App Doc Ref 5.4.8.13) prior to commencement of the authorised development. The updated BNG Report will need to be submitted to the relevant planning authority for approval prior to commencement of the development as detailed in the dDCO (App Doc Ref 2.1 [REP3-003]) Schedule 2 Requirement 25.

A record of discussions and outcomes to date has been provided in Appendix D of this document.

## 5.9 Hearing Action Point 63

***Amend the word 'following' within R10(8) of the dDCO to 'upon'.***

The Applicant has amended the draft DCO to make this change. This can be seen in the draft DCO submitted at Deadline 4.

## 5.10 Hearing Action Point 64

***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.***

The Applicant confirms that Requirement 7 of the draft DCO (App Doc Ref 2.1) states that no phase of the authorised development is to commence until aspects of detailed design have been submitted to and approved in writing by the relevant planning authority. In the draft DCO (App Doc Ref 2.1) provided at Deadline 4, the Applicant has expanded Requirement 7(1)(c) to expressly refer to hard and soft landscaping and ecological habitat creation. In relation to the detailed design of outfall itself, the Applicant confirms that details of this would form part of the details to be submitted for approval under requirement 7(1)(a) and would need to accord with the relevant section of the Design Code relating to the Outfall. This therefore secures the detailed design of Works Nos. 32 and 39. Details of habitat creation would therefore be approved under requirement 7, and in relation to ditch habitats requirement 10. Details of habitat reinstatement form part of the CoCP secured under requirement 9.

## 5.11 Hearing Action Point 65

***Update the outline Outfall Management and Monitoring Plan [REP2-026] to remove reference to Biodiversity Net Gain.***

The Applicant has updated ES Appendix 8.24 Outline Outfall Management & Monitoring Plan (App Doc Ref 5.4.8.24) and provided at Deadline 4. This removes reference to Requirement 10 of the draft DCO (App Doc Ref 2.1) securing 20% BNG for river units, since this has now been superseded by Requirement 25 of the draft DCO (App Doc Ref 2.1) as submitted at Deadline 3 and Deadline 4. Other more general references to BNG remain in the document.

## 5.12 Hearing Action Point 66

***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.***

The Applicant can confirm that it has added the following to the Design Code in relation to the Outfall. Additional CFD modelling to inform the final outfall design will therefore be secured through Requirement 7 of the dDCO as a result.

*Detailed design will produce additional CFD modelling to confirm the riverbed and bank protection measures are appropriate and sufficient*

## 5.13 Hearing Action Point 67

***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:***

- ***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?***

The Applicant has updated the ES Chapter 8: Biodiversity (App Doc Ref 5.2.8) and provided at Deadline 4, to remove the significant effect summarised in paragraph 5.1.9 in the version submitted at Deadline 2 [REP2-007]. The assessment text within Section 4 and as reported in Table 5-1 are correct. It is not considered that there will be a significant effect prior to vegetation establishing upon the CWS due to light spill.

The function of vegetation as screening is not the primary safeguard in relation to light mitigation. The lighting design strategy sets out a number of principles that are intended to achieve a 'low light' operational site. Vegetation is not included as part of lighting assessment mitigation due to the variation in screening that it provides, e.g. broadleaved trees do not have significant amounts of foliage present in the winter; however, it is recognised that vegetation, in reality, will provide an additional visual barrier to light progressively as it establishes.

Paragraph 3.3.3 within ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (LERMP) (App Doc Ref 5.4.8.14) [AS-066] notes that thicket vegetation on top of the earth bank will reach a height of 3m within 15 years, with trees reaching 8-10m in this timeframe. As such, by year 15 post planting, all but the tallest structures would be screened.

ES Appendix 2.5 Lighting Design Strategy (App Doc Ref 5.4.2.5) provided at Deadline 4 notes that the boiler stack, digesters and lightning protection associated with the gas bag would require permanent lighting in the form of navigation lights at 24m above ground level on the boiler stack; and four medium intensity red lights at 20m above existing ground level on both the digesters and the lightning protection associated with the gas bag. All other lighting that would be visible above the earth bank would be related to infrequent non-



routine maintenance with task lighting manually controlled and with an auto-off switch to reset the lighting each morning. The Applicant has updated ES Chapter 8: Biodiversity (App Doc Ref 5.2.8) and provided at Deadline 4 to add further detail on the lighting provided.

ES Appendix 2.5 Lighting Design Strategy (App Doc Ref 5.4.2.5) does not currently commit to ensuring a dark corridor along the discussed railway section of the CWS is maintained. The Applicant will amend the strategy to include a commitment to ensure that lighting within the Proposed WWTP does not contribute to increasing the existing CWS lighting levels at the disused railway track. The current design proposals set out within the strategy coupled with the distance of the light source to the CWS (300m) means that lighting is very unlikely to contribute to CWS lighting levels in this area and therefore this commitment was not considered necessary.

The lighting assessment incorporates best practice measures to mitigate for lighting impacts upon light sensitive wildlife species, compliant with the Institute for Lighting Professionals and Bat Conservation Trust Guidance Note 08/23. These measures include the use of lighting <2700K colour temperature, mounting lights facing downwards, and the use of LED luminaires to provide sharp cut off limiting light spill and no UV elements. Post-completion monitoring of lighting will also provide a means of identifying non-compliance and facilitate rectifying any issues in a timely manner. The Applicant does not consider additional mitigation is necessary as the Lighting Design Strategy (App Doc Ref 5.4.2.5) already adopts a restrictive design.

## 5.14 Hearing Action Point 68

***Update the CoCP Part A [REP3-026] section 7 regarding reptiles to account for double handling.***

The Applicant has updated the CoCP Part A for Deadline 4 submission with text to account for double handling. This is within paragraph 7.2.48, and states “The Reptile Mitigation Strategy will take into consideration other local development and will provide a coordinated approach to prevent any animals being double-handled during any translocations”.



## 5.15 Hearing Action Point 69

***Queries regarding protected species which were not able to be answered during ISH3 due to absence of the Applicant's lead Ecologist:***

- ***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?***
- ***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***

The Applicant understands there is concern regarding protection of reptiles, in particular in relation to land to the west of the railway line where the Applicant will install part of the Waterbeach pipeline.

As the Waterbeach pipeline route moves south, the Applicant's surveys indicated presence of reptiles and notes this area would be avoided through the use of trenchless construction techniques, alongside the measures outlined within the Reptile Mitigation Strategy (RMS).

Mitigation of impacts to reptiles is proposed through the measures in the CoCP Part A [REP3-028] which includes the preparation of a RMS as part of the detailed CEMP for the phase. The measures, in the strategy, could include translocation of populations from affected areas if other measures are not deemed sufficient.

In cases where there is translocation, it is also understood that there are concerns regarding reptile mitigation activities related to other schemes, in particular the Waterbeach Station Relocation, Waterbeach New Town and Waterbeach New Town East (planning consent not yet granted) with the potential for double handling of reptiles as a result of reptile mitigation for different schemes and cumulative effects.

The Applicant would coordinate with the parties delivering other schemes to develop a mitigation strategy that avoids double handling of species. The need to coordinate with other parties in relation to environmental matters is reflected in section 3 of the COCP Part B [REP3-026]. Although the Applicant believes that reptile translocation as a result of the Proposed Development is unlikely to be required due to the use of trenchless construction techniques, in the unlikely event that translocation is needed, the Applicant is confident that there are suitable locations within the Order Limits to accommodate translocated populations, accepting that the recipient locations may need some preparatory works to improve habitat suitability i.e. the provision of hibernacula (such as rock and brush piles) and appropriate foraging and refuge habitat. Such details would be in the RMS, which the relevant LPA would have the opportunity to review and approve through the dDCO Schedule 2 Requirement 9. The Applicant notes the construction could not commence until the CEMP (inclusive of the RMS) for the phase has been approved by the relevant local authority.

In relation to brown hare (*Lepus europeaus*), it is noted from the Applicant's biological records data search that this species is present in the local area, with 26 records within the records search buffer. No records were returned for within the Order Limits themselves, though it is recognised that hares are present within the habitats present across the local area. ES Chapter 8: Biodiversity (App Doc Ref 5.2.8) has been amended and provided at Deadline 4 to include this detail within the baseline text (see paragraph 3.1.116). Legal protection for this species extends to preventing sale between 1 March and 31 July (Hare Preservation Act 1892), and intentional or reckless killing, injuring or taking, between the 1<sup>st</sup> February and the 30<sup>th</sup> September (the close season) (Wildlife and Countryside Act, 1981). Brown hare whilst being defined as "ground game" by the Ground Game Act 1880, and "game" by the Game Act 1831, is a priority species (listed within Section 41 of the NERC Act 2006), for which public authorities have a responsibility for when exercising their normal functions. In this case, the CoCP Part A (Section 7.2) provides general measures to prevent the harming of during works activities (i.e. through provision of an ECoW and pre-commencement survey) in contravention of any legal requirement. In addition, the landscaping measures provided within the ES Appendix 8.14 Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14) [AS-066], once established, will provide woodland edge, grassland and scrub areas, available for this species to use.

## 6 Issue Specific Hearing 3 – Environmental Matters – Water Resources

### 6.1 Hearing Action Point 70

***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.***

The Applicant can confirm that the Riverside CSO was included in the network modelling of the catchment, for the development of the storm management solutions. As the CSO is not explicitly linked to the proposed CWWTPRP (it mitigates flood risk upstream to the WWTP), the Applicant stated it would confirm this point after the hearing. The justification to demonstrate the benefits of reduced CSO – with reference to the network modelling – is provided as follows.

Storm Management design approach was agreed with the EA on 2<sup>nd</sup> December 2021. Various other meetings were held to discuss findings during design development and the proposed storm management solution was accepted by the EA. An acceptance letter from EA Senior Environment Officer, dated 25<sup>th</sup> April 2022, was received in support – this letter is annexed to the current SoCG with the EA.

The following describes the storm management design approach, as agreed with the EA, and described in the storm report (APP 160 WW010003-000692-5.4.20.10 ES Volume 4 Chapter 20 Appendix 20.10 Storm model report). Results are compared to the existing Milton WRC.

The existing flows and loads to the existing WWTP were used to calibrate the flows and loads in the Cambridge sewer catchment network model. The existing calibrated model was then extended to include the proposed CWWTP scope elements including the tunnel, TPS and storm tanks.

Design flows and loads arriving at the proposed CWWTP were calculated in accordance with EA standards. The volumes of flow to treat at the treatment works and storm flows to store, were discussed and agreed with the EA.

The calibrated sewer catchment network model was then used to predict the storm events for various storm intensities, taking consideration of climate change impacts (1:100 storm event + 20% factor for climate change uncertainties). The modelling results defined the capacity of the proposed catchment infrastructure, including the sewer tunnel extension from the existing to the proposed CWWTP. At all times, the design basis remained: Maintain no detriment to the flooding in the catchment.

A storm management solution was developed and agreed with the EA to satisfy or outperform the EA's storm management requirements, namely:

- Learn from the operation of the existing WWTP storm system: frequency + volume of storm discharges.

- Verify existing and future storm solution (UPM compliant sewer catchment modelling).
- Pursue no deterioration in the catchment objective.

The table below provide a summary of the results, as agreed with the EA.

EA Requirement	Existing WWTP	CWWTRP solution	Conclusion
Learn from the operation of existing Cambridge WWTP storm system: frequency + volume of storm discharges.	Predicted 98.1 spills to storm tanks per year and 1 spill in 10 years to the river.	Predicted <10 spills to above ground storm tanks per year for all of the staged permit FFT conditions and 0 to the river.	The proposed CWWTRP storm solution will result in fewer frequency and less volume of storm discharges.
Verify existing and future storm solution.	The network model of the Cambridge catchment was built and verified in 2004; updated and verified in May 2013, when an extensive UPM was carried out. In 2019 the model was rebuilt and calibrated against catchment data (2019) to achieve further improved accuracy.	As described in points 1 to 3 above, the 2019 calibrated network model of the existing Cambridge catchment was used, and extended to include the proposed infrastructure (proposed tunnel, TPS, etc.)	Urban Pollution Management (UPM) compliant sewer catchment modelling was carried out.
Pursue no deterioration in the catchment objective.			No deterioration of flooding in the catchment could be demonstrated.

At the DCO Examination Hearing 3 questions were asked of the Applicant to support the following statement from the Project Description (*REP3-017 5.2.2 ES Volume 2 Chapter 2 Project Description*): “The proposed WWTP will provide greater resilience and improved storm management, meaning storm overflows and Combined Sewer Overflows (CSOs)<sup>4</sup> are

<sup>4</sup> England has a combined sewage system made up of hundreds of thousands of kilometres of sewers, built by the Victorians, in many urban centres. This means that clean rainwater and waste water from toilets, bathrooms and kitchens are conveyed in the same pipe to a sewage treatment works.

less likely to occur.” Additional to the information above to support the improved storm management, the following provides further information about the CSO and an explanation to support the reduction in CSO spills:

There is only one existing CSO in the Cambridge catchment, Riverside CSO, aptly named as it is located adjacent to the Riverside pumping station, where the sewer network pipework crosses the river and the pumping station lift flows from the one side of the river, up and over the river to the network on the other side.

The Riverside CSO is licenced by the EA, to protect upstream properties from flooding. The existing Riverside CSO will NOT be removed from the existing catchment as part of the proposed CWWTPRP.

No new CSOs are added as part of the proposed CWWTP – all storm flows are managed as detailed in the storm management description and table above.

No deterioration of flooding in the catchment was demonstrated through the UPM compliant sewer catchment modelling for up to 1:100 storm event + 20% factor for climate change uncertainties.

As the proposed CWWTP network downstream of the existing WWTP will provide greater storm management resilience, the probability of the existing network using the CSO to provide flooding protection is reduced:

- Flow will remain free discharging into the proposed CWWTPRP terminal pumping station (TPS) for daily fluctuation flows (Dry Weather Flow, Flow to Full Treatment and beyond), prior to the agreed in-line storm storage utilisation during high rainfall events. This means that flows will continue to flow away from the CSO area, reducing the risk of a storm overflow event at the Riverside CSO occurring.
- The additional 2.4km tunnel provides attenuation of flows in the catchment, which further improves the stability of operation.
- More flow is moved out of the catchment, faster (higher FFT than existing). This means flows are moved away from the CSO area, reducing the risk of an overflow event occurring.
- A higher FFT also means more flows are treated fully and less flows are left in the storm management systems.
- 1:30 year flood events were historically considered adequate for catchment designs. Historic reports of the Riverside Tunnel Project referred to a robustness test scenario of a 1:50 year flood event. The proposed CWWTPRP

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During heavy rainfall the capacity of these pipes can be exceeded, which means possible inundation of sewage works and the potential to back up and flood peoples' homes, roads and open spaces, unless it is allowed to spill elsewhere. Combined sewer overflows (CSOs) were developed as overflow valves to reduce the risk of sewage backing up during heavy rainfall.

Overflows of diluted sewage during heavy rainfall are not a sign that the system is faulty. Combined sewer overflows (CSOs) are a necessary part of the existing sewerage system, preventing sewage from flooding homes and businesses. Source: <https://environmentagency.blog.gov.uk/2020/07/02/combined-sewer-overflows-explained/>, last accessed 27.09.2022.

(including tunnel, TPS and WWTP) utilises 1:100 storm event + 20% factor for climate change uncertainties to evaluate risks of flooding. The consideration of this larger theoretical storm will provide modelled assurance (UPM equivalent) of robust consideration of potential flooding (storm) events.

From the above evaluation it can be concluded that the resilience provided as part of the CWWTPRP, will result in fewer CSO spills occurring (if indeed any) following the implementation of the proposed CWWTP.

The improved storm management offered by the proposed CWWTP, offering reduced storm spills to the river Cam by storing and treating flows that would traditionally be discharged as CSO flows at/from the CWWTPRP and thereby eliminating CSO inclusion in the proposed CWWTP, would offer a benefit and should be assigned a positive weighting. When compared to the existing WWTP, the storm management would provide a benefit in storm discharge reductions. As the frequencies of storm discharge from the existing WWTP is low, the improvement in water quality associated with the reduction in storm discharge events alone would be low. However, when combined with the climate change reliance added, improved storm management resilience, the overall water quality benefits of the proposed CWWTP and social benefits associated with assurance in reduction in storm discharges, the benefit would be high.

In summary (and as noted in the Planning Statement, Document Reference 7.5 Planning Statement, superseded by documents AS-128 and AS-129), the Proposed Development constitutes significant investment in the provision of 'critical infrastructure'. It is designed with future flood events in mind including climate change. It will treat more flow to a higher standard. It will reduce storm spills to the River Cam by storing and treating flows that would traditionally be discharged as CSO flows. Final effluent discharge of Phosphorous and Ammonia will be reduced. It will provide a positive contribution to the river for flow assurance to downstream water users (for amenity and abstraction) and a positive contribution to the overall river quality. Therefore cumulative benefits of accelerating the delivery of these improvements is significant.

## 6.2 Hearing Action Point 71

***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.***

The water quality impact of final effluent discharge to the River Cam was assessed and described within section 4 of the ES Chapter 20 Water resources (App Doc Ref 5.2.20) [AS-040].

As mentioned at the Examination Hearing, Water Framework Directive (WFD) parameters are listed in [Catchment Data Explorer](#). For the River Cam, Phosphate and Ammonia are WFD



physico-chemical quality elements. Phosphate is currently designated as “Poor” WFD status, and hence of particular concern to the Environment Agency. The assessment in Chapter 20, based on indicative consent conditions, showed a benefit to final effluent discharge for Total Phosphorous and Ammoniacal Nitrogen, for the proposed indicative consent conditions compared to the existing consent conditions.

Furthermore, all final effluent quality parameters are evaluated by the Environment Agency as part of the environmental permit approval evaluation based on, amongst others, a minimum of a ‘no deterioration’ to the River Cam.

The improved water quality offered by the proposed WWTP final effluent, discharged to the River Cam and forming a significant contribution to the river’s flow pattern, would be low due to the overall river condition. However, the CWWTP will be treating more flow to a higher standard, which will bring forward a significant benefit to the River Cam when the proposed CWWTP becomes operational.

### 6.3 Hearing Action Point 72

***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.***

ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [AS-040] compares final effluent discharge consent conditions for the existing Cambridge WWTP to indicative consent conditions for the proposed WWTP. In the assessment, effluent load (a product of Dry Weather Flow (DWF) and Concentration limits) is compared for each consented parameter. For Total Phosphorous as P and Ammoniacal Nitrogen, this simple comparison shows benefit for the proposed WWTP final effluent discharge compared to the existing Cambridge WWTP. The assessment is clear that the same benefit does not extend to Total Suspended Solids (TSS) and Biochemical Oxygen Demand (BOD) and therefore REP2-063 21:33(a) statement that the assessment overstates the benefits to the River Cam, is unfounded. The interim permit will be temporary and is not part of this DCO application and therefore indicative consent conditions relating to the interim permit have not been assessed in ES Chapter 20: Water Resources (App Doc Ref 5.2.20) [AS-040].

### 6.4 Hearing Action Point 73

***Confirm whether the Consents and Other Permits Register [REP1-047] needs updating to refer to a dewatering licence.***

There is no additional need for a “dewatering licence”. A water abstraction licence will be required pursuant to the Water Resources Act 1991 from the Environment Agency for the abstraction of water for the construction works and this is already included in the Consents and Other Permits Register [REP1-047]. In the event the Applicant needed to discharge water arising from the construction work into an Internal Drainage Board (“IDB”) owned ditch, this would require their consent. A letter of no impediment for such a licence is

sought and will be attached to the Statements of Common ground for the Swaffam and Waterbeach IDB.

## 6.5 Hearing Action Point 74

***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***

The Outline Water Quality Monitoring Plan [REP2-028] confirms that monitoring of water levels will be undertaken at the two private water supplies which might be impacted during construction dewatering. The private non-derogation agreements with the private water supply owners will set out the method and timing of notification in the event of any contamination identified by this monitoring. This notification is therefore not included in the dDCO.

## 6.6 Hearing Action Point 75

***Provide an update regarding correspondence with, and any agreement reached with Cambridge Water regarding the water supply to the Proposed Development.***

The Applicant has sought written confirmation from Cambridge Water on this point to confirm that they see no impediment to the submission of an application for a connection in accordance with the provisions of the Water Industry Act 1991. The response will be added to the Statement of Common Ground (App Doc Ref 7.14.3).

## 6.7 Hearing Action Point 77

***Confirm if Best Available Techniques would be used for the Waterbeach pipeline.***

The Applicant has discussed the installation and commissioning techniques with the Environment Agency's groundwater specialist (Mr Graham Phillips) and we are in agreement that the design as presented is the best available techniques for a Waterbeach pipelines of this specific type, size and function. A meeting was held on 19 January 2024 with Mr Phillips to run through the full operational and installation process for the Waterbeach pipelines and the operational testing that will be undertaken prior to its use. The Applicant has prepared a briefing note dated 19 January 2024 for Mr Phillips to review setting out the techniques used and agreement to this wording is sought.

## 6.8 Hearing Action Point 78

***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.***

The Applicant will report the results of the existing ground investigations in a Generic Quantitative Risk Assessment (GQRA) in accordance with the Environment Agency's Land



Contamination Risk Management (LCRM) guidance. The GQRA will update the preliminary conceptual site model presented in the preliminary risk assessment (PRA) and provide recommendations on next steps in the LCRM risk assessment process. Recommendations in the GQRA will supersede any recommendations made in the PRA (including the need for a foundation works risk assessment).

## 6.9 Hearing Action Point 81

***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.***

The Applicant has provided the information required for the provision of a letter of no impediment for a temporary consent for dewatering. The Statements of Common Ground for the Swaffam Internal Drainage Board (IDB) (App Doc Ref 7.14.15) and the Waterbeach IDB (App Doc Ref 7.14.20) have been amended to confirm that no impediment point to the provision of a consent is therefore expected and the formal letters sought from the IDB. These will be included in the updated Statements of Common Ground at Deadline 5 which the Applicant has also requested are signed as the final completed versions.

## 6.10 Hearing Action Point 82

***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.***

The Applicant has prepared a technical note that assesses potential impacts on septic tanks (Appendix C of this document) and has been submitted at Deadline 4.

## 6.11 Hearing Action Point 83

***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.***

The Applicant can confirm that the Environment Agency has received the updated modelling in relation to the Flood Risk Assessment (FRA) and has advised on 18 January 2024 that they have completed their review and that the reviewer has concluded that the modelling is appropriate. The Applicant is in the process of providing a model update to cover an additional scenario requested by the Environment Agency and preparing a revised FRA.

## 7 Issue Specific Hearing 3 – Environmental Matters – Land Quality

### 7.1 Hearing Action Point 84

***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.***

The Applicant will report the results of the existing ground investigations in a Generic Quantitative Risk Assessment (GQRA) in accordance with the Environment Agency's Land Contamination Risk Management (LCRM) guidance. The GQRA will update the preliminary conceptual site model presented in the preliminary risk assessment (PRA) and provide recommendations on next steps in the LCRM risk assessment process. Recommendations in the GQRA will supersede any recommendations made in the PRA (including the need for a foundation works risk assessment).

## 8 Issue Specific Hearing 3 – Environmental Matters – Historic Environment

### 8.1 Hearing Action Point 85

***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].***

The Applicant has amended page v and paragraph 4.2.20 of ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) and submitted at Deadline 4. This now reports a moderate temporary adverse effect to Baits Bite Lock Conservation Area (HE095). This is now consistent across the relevant documents.

### 8.2 Hearing Action Point 86

***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 11 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.***

The Applicant updated paragraph 2.2.5 of ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) and paragraph 1.1.1 of ES Appendix 13.4 Historic Environment Impact Assessment Tables (App Doc Ref 5.4.13.4) to make clear that the significance of effects are reported prior to mitigation. The updated documents have been provided at Deadline 4.

The Applicant reports in ES Appendix 13.4 Historic Environment Impact Assessment Tables (App Doc Ref 5.4.13.4) provided at Deadline 4 that the unmitigated permanent construction level of effect on Baits Bite Lock Conservation Area (HE095) is moderate adverse. This is before the application of mitigation. Paragraph 4.2.51 of ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) provided at Deadline 4 records the level of effect following the application of primary and tertiary mitigation, resulting in a reduced level of effect (slight adverse). Paragraph 4.2.57 reports the residual effect as slight adverse.

### 8.3 Hearing Action Point 87

***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]).***

The Applicant has provided summary tables of all impacts to designated heritage assets and reports whether they would experience less than substantial harm within the updated ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) provided at Deadline 4:

- Paragraph 4.2.23 and Table 4.1 summaries the level of temporary construction effects caused by the construction of the WWTP on all designated assets non- mitigated and mitigated.
- Paragraph 4.2.58 and Table 4.2 summarises the level of permanent construction effect caused by the construction of the WWTP on all designated assets non-mitigated and mitigated.
- Paragraph 4.2.67 and Table 4.3 summaries the level of temporary construction effects caused by the construction of the Waterbeach pipeline on all designated assets non-mitigated and mitigated.
- Paragraph 4.3.11 and Table 4.4 summarises the level of operational effect caused by the construction of the WWTP on all designated assets non-mitigated and mitigated.

No permanent construction or operation effects have been identified for Waterbeach pipeline. All designated assets identified in Tables 4.1, 4.2, 4.3 and 4.4 will be subject to less than substantial harm. ES Appendix 13.4 Historic Environment Impact Assessment Tables (App Doc Ref 5.4.13.4) provided at Deadline 4 does not identify any additional effects to designated assets that would cause harm.

### 8.4 Hearing Action Point 88

***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.***

The Applicant has provided summary tables of all impacted designated assets within the updated ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) provided at Deadline 4. These are Tables 4.1, 4.2, 4.3 and 4.4. All designated assets identified in these tables as stated will be subject to less than substantial harm.

The Applicant has also updated section 5.6 (Assessment of harm on designated assets) of the updated ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) provided at Deadline 4 to clarify the level of harm identified for all of the affected designated assets.

## 8.5 Hearing Action Point 89

***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.***

The Applicant confirms that South Cambridgeshire District Council has advised this requires their further consideration and investigating what potential mitigation could be applied. A date for a further discussion after this investigation is planned during the week commencing 22 January but it will not be possible to give a full response before Deadline 4.

## 9 Issue Specific Hearing 3 – Environmental Matters – Landscape and Visual/Design

### 9.1 Hearing Action Point 91

***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).***

Various factors were considered during design development to contribute to the overall result of the number, size and associated height of process units. Whilst design information can be provided for greater insights into design consideration (retention, pathogen kill and volatile solids destruction rates, etc.), the Applicant's understanding is that the Examiner would like to understand what steps the Applicant has taken to mitigate the visual impact of the proposed development's tallest structures height.

Various design configurations and means of visual impact reductions were considered during design development, including the use of an increased number of smaller units. Aspects including throughput, process design aspects, safety, environmental impacts (air, noise, water quality, visual etc.) were considered, in respect of the number of either the digester tanks, the HPH train and the gas holder. More details on each element, are provided as follows:

For the digesters – as the tallest structures on site (apart from the 2m wide boiler stack) a few dedicated challenges to the height of the structures can be referenced.

The Applicant's design for the digesters is informed by significant experience in their reliable and safe operation. The CWWTPR design team has used this experience to inform the optimisation of an existing digester design through a Risk, Opportunity and Value (ROV) decision making process, whereby challenge of various options available, configurations, permutations, improvements, etc. are challenged, whilst considering costs, carbon, environmental factors (visual impact, biodiversity, etc.), etc. whilst also considering risks to the process stability, and compliance with permits and other requirements. This challenge and decision making process spans 6 to 12 months per element and was used for all significant process units, included the pre-treatment process decision, digesters, waste water treatment process, etc.

A Risk, Opportunity and Value (ROV) workshop was held on 6th October 2021 to challenge the initial digester design on the grounds of visual impact, carbon footprint, lowest whole life cost with the objective to consider options of digester configurations, including 2No. and 3No. digester tanks were compared. The result of the ROV workshop was that whilst the 3No. digester tanks provided the lowest visual impact, the 2No. digester tanks provided the smallest footprint, the lowest carbon impact, the lowest capital- and operational cost and the lowest headloss.

The findings also included that increasing the number of process units increased the site's performance and compliance risk, by introducing additional equipment and process points of failure. Although all digesters would be fed with pre-treated sludge, each digester's process performance is established and maintained independently. Anglian Water's experience, from operating 10 No. other STCs, was that the minimum possible number of units would be preferred. For Cambridge, two units were chosen to strike the balance between the minimum units and reducing the visual impact. 3 No digesters may reduce the height of the units but it would increase the massing effect of them over the earth bank.

Anglian Water's design standards, which reflected the optimum digester proportions as 1:1 aspect ratio (diameter: sludge height), was challenged and a reduced aspect ratio of 1.75:1 (diameter: sludge height) was adopted by the CWWTPR design team as a mitigation to reduce the visual impact of the 2 No. digesters - this is the digester information and visual impact included in the DCO application (REP3-017 m5.2.2. ES Volume 2 Chapter 2 Project Description and refer to Table 1-15 Digestion plant sizing).

The HPH process tanks (heating, pasteurisation and hydrolysis processes, applied in series) and associated equipment have been standardised and the AWS patented process is now marketed by RHDHV, under license. As the process was purposely developed to serve the digestion pre-treatment needs, the aspect ratios of these tanks are not as flexible as for digesters. As discussed in Hearing Action Point 92 (below), the HPH process units included in the CWWTPRP design are standard sizes associated with a single pre-treatment stream, associated with the process throughput requirement (16,000 TDS/a). Including two streams of the smaller capacity HPH product (2 x 10,000 TDS/a = 20,000 TDS/a) would exceed the project needs, and have significant cost, carbon, footprint, risk, etc. implications. The height of the HPH tanks for the HPH module included was thus not further challenged.

The capacity requirements of the gas holder drive the dimensions of the gas holder and its safety exclusion zone to nearby structures. As for digesters, minimizing the number of units of gas holders, minimizes the risks and simplifies risk monitoring and mitigation systems on site. Additional units would also have a significant impact on footprint (refer to avoiding overlapping explosive atmosphere discussion under Hearing Action Point 92), cost, carbon and environmental impact. Dome shaped gas holders were chosen over taller cylindrical or egg-shaped gas holders, as they provided the lowest visual impact. The height of the gas holder, determined by the naturally forming dome shape, included keeping the earth embankment height to a minimum. The gas holder is placed on an earth embankment for safety reasons (to raise the incoming/discharge gas mains and control valves above ground, eliminating regular confined workspaces entry).

A common mitigation to visual impact would be to partially bury structures. However, due to the high water table of the site, specific ground conditions in the area (piling required), safety considerations including confined spaces and explosive atmospheres, and the Industrial Emissions Directive (IED) requirement to provide secondary containment systems for the prevention of pollution, these factors combined resulted in the partial bury solutions not being viable for these specific assets. Additionally, the IED best available techniques (BAT), BAT19h (pg 734), requires that underground components should be minimised. The current design has already maximized excavating into the ground to a practicable point of 1.4m below existing ground levels. Further excavation would result in an overlap with the



ground water table with the excavation. Encountering significant amounts of ground water would increase the environmental impact of the project in construction to dewater and discharge of the ground water. The additional dewatering requirements of lowering the digesters, and resultantly needing to reduce the water level in the area, would cause potential (very likely) impacts on the existing ground water table levels. The deeper the excavation, the greater the required engineered solution to prevent uplift due to buoyancy and drainage control measures. The current drainage strategy provides portions of the WWTP free drainage to the environment with the utilisation of external landforms and ditches (refer to the Project Description (REP3-017), etc. for details). As the WWTP levels across site (STC and waste water treatment portions) are linked through roads, ground levels and pipework, further lowering of the digesters area would result in all surface water needing to be pumped – not naturally draining to the environment for the uncontaminated areas. Where this could be technically possible, it would mean a permanent operational cost of pumping surface water, as well as creating an additional (new) internal flooding risk of the WWTP for when the drainage pumping station fails.

## 9.2 Hearing Action Point 92

***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.***

Additional to information about reduced visual impact provided for Hearing Action Point 91, the following response to provide context to what degree the reduction in height or scale's impact on the overall function. Information for digesters and gas holder, and heating, pasteurisation and hydrolysis plant are provided.

As described in Hearing Action Point 91 above, the HPH plant sizing has been standardised. The HPH module included in the CWWTPRP is the module typically sold as a 15,000 TDS/a unit. The applicant has developed the design around optimising feed assurance consistency and minimising downtime (e.g. duty, standby equipment provision) and thus have already utilised the margin included in the module's capacity by assessing maximum hourly feed capacity to ensure the required 16,000 TDS/a can be processed. As such, a reduction in scale would thus directly reduce the CWWTPRP ability to process the required amount of sludge through the year.

Gas holders provide a buffer between gas generation and gas supply to the national gas network, by smoothing out peaks and troughs and thereby providing operational flexibility. Gas holder capacity is a fine balance between mitigating reducing emissions from flaring gas when you have too much gas (using the waste gas burner) (*drives bigger gas bags*) and reducing gas explosion risk on site (*drives smaller gas bags*). Other factors such as cost, carbon, visual impact, footprint, etc. could also be added to the balance. As described in Hearing Action Point 91 above, the gas holder sizing is driven by the required capacity, which is in turn driven by the sludge processed at the facility. The capacity included in the CWWTRP (2hrs gas production capacity) is Anglian Water's asset standard requirement and



is also water industry best practice. A reduction in size of the gas bag would thus directly reduce the CWWTRP ability to process the required amount of sludge. Alternatively, should the gas bag size be reduced, the environmental impact (air emissions impact) would increase. The increased safety and environmental risks are associated with the increase in complexity of the gas pressure control and relief system. From an operational perspective, the pressure in the digesters requires stability. From a safety perspective, each element in the biogas chain from the HPH process tanks, digesters, post digestion processes, gas upgrading equipment, gas holder, and waste-gas burner (flare) must be considered individually to relief pressure upon any of these linked element's malfunction or failure, whilst aiming to minimize release to the environment and maximise gas storage utilisation. Each element's gas pressure relief point must be set and monitored to ensure the system is operated stable and safely. Multiplying gas holders introduces an additional level of complexity to interlink and equalise stored gas capacity for forward feed to boilers and gas upgrading equipment, whilst protecting the gas stored in each gas holder separately from ignition risks through near instant closing valves.

We have added AWS' patented pre-treatment step, HPH, before digestion. This enables an intensification of the digestion step, meaning we can achieve better pathogen kill reliability by controlling the pasteurisation step on its own (and thus better sludge quality product) and lower digestion retention times, which reduces the digester capacity needed by approximately ½ compared to just anaerobic digestion on its own.

Digesters capacity is driven by the volume of sludge to process, and the amount of treatment required to achieve the required volatile solids destruction and associated pathogen kill. This is determined by the digestion treatment process configuration (pre- and post-treatment) and operating temperature, and dependently can be expressed as a required retention time. Details of what was included in the CWWTRP design have been included in paragraph 1.8.14 of the Project Description (REP3-017 5.2.2 ES Volume 2 Chapter 2 Project Description).

In item Hearing Action Point 91 above details have been provided of the challenge that has already been applied to the Anglian Water asset standards to reduce the digesters height to up to the limit acceptable prior to impacting function. Any further reductions in height would result in a non-linear increase in capacity to compensate for the loss of efficiency. It would also result in a factor increase of associated equipment, e.g. additional mixer per digester, additional heating and cooling equipment, additional emergency gas pressure relief valves, etc.

There are also other factors to consider, when considering the number of units, that result in a non-linear relationship between processing capacity, footprint and height of digesters:

For digesters, there is an amount of "practical" height that is required additional to the calculated digester volume for the required retention times. This includes allowance for the pipe and man-access arrangements at the bottom of the digester to get the sludge in and to be able to suck the grit out (maintenance), mixing equipment, etc. (about 2m to 4m, dependent on the tank diameter). Additionally, at the top of the digester headroom is required for foam management, biogas collection and tank over-pressure protection

systems. Typically, 1.5m to 2m is allowed to the roof and dependent on the roof arrangement itself, an additional 2m to 5m can be added (regardless of liquid depth).

One of the requirements of the Industrial Emissions Directive (IED) is to provide secondary containment systems for the prevention of pollution. The current Construction Industry Research and Information Association (CIRIA) guidelines (C736F) is widely used and accepted by the EA as guidance for design of containment systems for the prevention of water pollution from industrial incidents. The CIRIA guidance require containment for 110% of the largest tank or 25% of the total tank inventory volume, whichever is greater. By increasing the number of digester tanks, the largest tank volume is reduced, but the overall tank inventory volume, which is the greater of the two volumes, increases. Resultantly, the site containment solution, site drainage and overall waste water treatment capacity would have to be increased to adapt.

Whilst all the process units have different design drivers, the units enquired about at the hearing are all biogas (includes bio-methane) containing structures. As such, they are all subject to various laws, codes of practice, guidance documents, etc. including Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) and Industrial Emissions Directive (IED). Assessing risks and reducing (or, where possible, eliminating) Hazardous Areas is required in the design development process. Where we are unable to eliminate the explosive atmosphere, e.g. inside a gas storage bag, controls are put in place to manage risks. For all the biogas containing structures, these include controls over keeping ignition sources out of these areas. Taking precautions to avoid maintenance work on one structure impacting the operation of another (i.e. avoiding an ignition source from maintenance into an operational explosive area) would be required. Where an open tank e.g. a final settlement tank, can easily be divided and placed adjacent to one another, biogas containing structures would pose a compounding risk where explosive atmospheres (or Zones) overlap (one ignition trigger chain reaction to the next) and as such would be placed with calculated non-overlapping distances or BAT guidance exclusion zones distances apart. Splitting biogas containing structures into multiply units thus have a non-linear multiplication impact on footprint, costs and carbon impacts.

### 9.3 Hearing Action Point 93

***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***

The Applicant refers to Appendix H of this document.

## 9.4 Hearing Action Point 94

***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.***

A 'plume' is the column of exhaust gas as it leaves the top of the boiler/CHP stack or flare stack and moves through the atmosphere. There will always be a plume when combustion processes (boilers, CHPs or flare) are operating. The visibility of the plume falls into two categories 1) heat haze from hot air rising as it mixes with cooler ambient air and/or 2) a white column of moisture, which looks like a cloud, caused by the condensation of water vapour when the ambient air reduces the temperature of the plume, thereby diminishing the plume's ability to keep moisture in a gaseous state.

For the flare, heat haze may be visible when the flare is operational. As the flare is of enclosed (shielded) design, heat haze would be visible at the top of the shield (15m above finished ground level). As the exhaust temperature of the flare is extremely hot (1000 degrees Celsius as presented in Appendix 7.1: Air Quality Assessment Method) condensation of moisture out of the resulting plume is extremely unlikely to occur. It is emphasised that the flare is a waste gas burner, only activated during unforeseen events when the biogas upgraded to biomethane cannot be received by the national gas network and the site's biogas storage capacity has been exceeded. Several design and operational mitigation measures are in place to minimise a release occurring. However, the flare (waste gas burner) is critical to ensure a safe gas management system is achieved and is included in the Environmental Permit application.

For the boiler stack, heat haze may also be present, although would reduce rapidly as the exhaust temperature is low (140 degrees Celsius for the boiler as presented in Appendix 7.1: Air Quality Assessment Method) and being transparent, would be unlikely to be discernible from surrounding cooler air. Indicative plume visibility modelling shows that the boiler stack plume may be visible for approximately 10% of the year within the airspace above the site boundary and would have the appearance of white vapour. Any visible plume would not resemble large volume plumes typically associated with exhaust from power stations but would be more akin to that released from a domestic condensing boiler on a cold day. Any visible plume would quickly disperse and therefore would be most apparent on still days when the sky is blue. Against a cloudy sky it would be barely perceptible.

Details of the proposed flare stack have been incorporated into the Design Code (App Doc Ref 7.17 Design Code ).

## 9.5 Hearing Action Point 95

***Clarification regarding the Arboricultural Impact Assessment for the Waterbeach pipeline [REP1-035], including:***

- ***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.***

The pink polygons/lines on the plans within the Arboricultural Impact Assessment for the Waterbeach pipeline [REP1-035] represent the Root Protection Areas for trees and hedgerows.

As noted in paragraph 8.2.1 of the Arboricultural Impact Assessment for the Waterbeach Pipeline (App Doc Ref 5.4.8.19)[ REP1-035] 'Where it is agreed that vehicular or pedestrian access for construction purposes is necessary within the RPA, ground protection measures will be required to prevent damage to the soil structure within the RPA.' Therefore, where protective fencing is shown and it conflicts with construction access arrangements, ground protection would be implemented instead.

Section 1.2.2 of the Arboricultural Impact Assessment for the Waterbeach Pipeline (App Doc Ref 5.4.8.19)[ REP1-035] notes that method of installation will be micromanaged to minimize losses and that the easement shown is still subject to final design. Where trees (i.e T073) are not shown on the Hedgerow Regulation and Tree Preservation Plan (App Doc Ref 4.8) as for removal these will be retained through a micrositing exercise which will be reflected in the final design submitted as part of the discharge of requirements.

## 9.6 Hearing Action Point 96

***Update the CoCP to ensure that replacement tree planting would be secured as necessary.***

Section 7.2 of the Code of Construction Part A (App Doc Ref 5.4.2.1) has been strengthened with regards to the Applicants commitments for the reinstatement of trees. The Applicant has also taken the opportunity to strengthen the wording on the reinstatement of hedgerows and habitats as well.

## 9.7 Hearing Action Point 97

***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).***

All parameters have been checked and corrected where necessary.

## 9.8 Hearing Action Point 98

***Provide additional information regarding the minimum of the proposed bunding, and an explanation for lack of a minimum parameter in this regard within the dDCO [REP3-003].***

The Design Code (REP4 7.17) incorporates a code, LAN.02, set out below, relating to the minimum embankment height. This is secured by Requirement 7 of the dDCO (see Appendix D of the DCO Tracker).

### **LAN.02**

**The earth bank should be a minimum of 5m above existing ground levels to provide natural screening. The earth bank profile should integrate with the surrounding landscape, with an outer slope between 1:2.5 and 1:5 where the landforms are at their widest and a steeper 1:2.5 (maximum) interior slope.**

## 10 Issue Specific Hearing 3 – Environmental Matters – Green Belt

### 10.1 Hearing Action Point 99

***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.***

More generally, there are areas of the Cambridge Green Belt which are within Cambridge City Council's administrative area and hence the adopted Cambridge Local Plan 2018 includes policy relating to the Green Belt. However, within the immediate area of the Order Limits for the Proposed Development the Green Belt boundary follows the administrative boundary separating South Cambridgeshire district and Cambridge City. The Applicant's opinion, which has been agreed with both Councils, is that no part of the Order Limits overlaps Green Belt land within Cambridge City's authority area and so any Green Belt policy relating to Green Belt in the adopted Cambridge Local Plan 2018 referenced in the Green Belt Assessment [APP-207] is not relevant to this project. Drawing no. W/CWWTPR/MM/ISH3/GB001 attached at Appendix A of this document overlays the Green Belt boundary onto the Order Limits and the authority boundary. It shows that there is no Green Belt within this specific part of Cambridge City's boundary.

### 10.2 Hearing Action Point 100

***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.***

The Applicant has addressed this Action in its written summary of case at ISH 3

## 11 Issue Specific Hearing 3 – Environmental Matters – Other

### 11.1 Hearing Action Point 101

**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. To address matters around inconsistencies in updated documents, including:

- **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.**
- **To address matters around the errata list and updated documents, including:**
  - **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. Matters around any potential missing documents, including;**
- **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 14 at D3 but the ExA can not locate this, and it is unclear where Car Dyke Lane is in any event.**
- **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.**
- **Clarification around the Applicant's post hearing submission [REP1-082] Appendix C – Working Timetable, including 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.**



*Environmental Statement (ES) Chapter 2 [REP1-021 and REP1-022]* – The Applicant acknowledges that the versions provided at Deadline 1 and 3 are different and confirms that this format was submitted in error. The correctly formatted version which includes Deadline 1 and Deadline 3 updates has provided at Deadline 4.

*ES Chapter 13: Historic Environment clean version [REP1-023]* - The Applicant has addressed these formatting errors in the version of ES Chapter 13: Historic Environment (App Doc Ref 5.2.13) submitted at Deadline 4.

*Baseline Agricultural Land Classification [REP1-030]* - The Applicant has addressed these formatting errors in the version of ES Appendix 6.1 Baseline Agricultural Land Classification (App Doc Ref 5.4.6.1) submitted at Deadline 4.

*Para 2.2.1 of the PEA [AS-072]* - The Applicant has addressed this formatting error in the version of ES Appendix 8.23 Preliminary Ecological Appraisal (App Doc Ref 5.4.8.23) submitted at Deadline 4.

*ExQ1 13.18* - The Applicant confirms that there was an error in the response to ExQ1 13.18. It should have stated that the updated Books of Figures Historic Environment were provided at Procedural Deadline A, rather than Deadline 1. All figures have therefore already been provided in September 2023.

*Code of Construction Practice Part B* – The version history was completed before the page numbering was corrected, the version history should have read pages 8 and 9 not 3 and 4.

*ExQ1.16.19* – The Code of Construction Practice Part A was updated in several locations to correct the height from 15m to 10m however 1 entry was missed during the updating process. This has been updated in the Deadline 4 submission.

*ExQ1.20.35* – The Applicant reviewed the points on the Access and TRO Plans (App Doc Ref 4.9)[AS-154] and the Transport Assessment Figure on page 185 (App Doc Ref 5.4.19.3) [AS-108] and determined that no changes were required therefore did not provide revised plans. The Response to the ExQ1 20.35 should have been updated to state the following:

The purpose of the Access & TRO Plans is show the construction and operational access and any powers sought through the draft DCO in relation to these accesses. The purpose of the construction route illustration shown in the Transport Assessment is to show the construction routes that construction vehicles will take and the corresponding construction access point. The reason that Point Q to T33 and Point W to Y extend beyond the construction routes shown is because these specifically relate to powers sought to control traffic along these section (i.e. other users of the network) and do not form part of the construction routes to be taken by construction vehicles.

With regard to Construction access point COA12 the Applicant acknowledges that the location of the yellow indicator circle made it difficult to see that the construction route entered the southern land parcel and did not extend out onto Burgess Drove and will be provided an updated figure with the Transport Assessment at Deadline 5. The Construction Traffic Management Plan Figure 3.1 (App Doc Ref 5.4.19.7) has also been updated to better demonstrate the construction route by moving the access label.



*ExQ1 20.10* - The response to ExQ1 20.10 said that the Applicant would produce a map showing the temporary parking restriction at the Bannold Road junction with Denny End Road / Car Dyke Lane at Deadline 3. However, on further review, the Applicant identified that the plan requested in ExQ1 20.10 was already included in the DCO application, as part of Sheet 10 of the Access and Traffic Regulations Plans [AS-154] (App Doc Ref 4.7).

ExQ1.8.19(2) – The Applicant has reviewed the 8.3 Applicants Responses to ExQ1 [REP1-079] and has only found ExQ1 8.19 (2) to have a partial obscurity. The full response to 8.19(2): *'In the light of the DCLG guidance, in particular para 8, please describe: How the ExA can be assured that all reasonable alternatives to CA (including modifications to the scheme) have been explored; and Set out in summary form, with document references where appropriate, what assessment / comparison has been made of the alternatives to the proposed acquisition of land or interests in each case.'* Is as follows:

- a. The Applicant does not have the benefit of owning any land, or having any land under its control, within the Order Limits, save for the site of the existing WWTP (see Sheet 1 of the Land Plans (App Doc Ref 4.4) [AS-151]).

The Site Selection Reports (App Doc Refs 5.4.3.2 to 5.4.3.4) [AS-075 to AS-078] set out the methodology used to assess alternative sites for the location of the new WWTP and the potential routes of the necessary connecting pipes and tunnels. The results of the site selection process settled the location of the land required for the Proposed Development. (App Doc Ref 5.4.3.5) [AS-078]. None of the alternative sites or routes which were considered would have obviated the need for the compulsory acquisition of land for the Proposed Development. The Applicant also consulted on the site selection process. The results of that consultation can be found in the Consultation Appendix Site Selection Report (App Doc Ref 6.1.15) [AS-179].

Having selected the proposed location for the Proposed Development, the Applicant engaged in discussions with the owners of land identified as being needed for the Proposed Development. Those discussions sought to agree the acquisition of land and rights by negotiation. The current status of those discussions is set out in the Compulsory Acquisition Schedule (included in the Applicant's Deadline 1 submission). It should be noted that alternative land within the vicinity of the Order Limits was not offered to the Applicant, for the new WWTP, tunnel or pipeline routes.

In addition, the Applicant has consulted upon and discussed the location of various elements or parts of the Proposed Development with landowners and occupiers. Where possible, as part of the design evolution of the Proposed Development, the Applicant has amended elements of design and/or land requirements, which are explained further in the Applicant's response to part b below.

In relation to the land the Applicant owns at the existing WWTP, that land will be used for the delivery of Hartree, which is enabled by the Proposed Development, as described in the Planning Statement Planning Statement (App Doc Ref 7.5) [AS-128]. As a result, this land is not available for the Proposed Development, other than the land which will contain the Waterbeach Pipeline South Pipeline (Works Nos 36 (see Works Plans (App Doc Ref 4.3) [AS-150]), the Waste Water Transfer Tunnel (Works Nos 27 (see Works Plans (App Doc Ref 4.3) [AS-150]).

The Applicant has therefore assessed all reasonable alternatives to compulsory acquisition and concludes that no such alternatives exist.

b. As explained in a. above, the site selection process considered alternatives for the location of the new WWTP and the connecting pipes and tunnel. As described in the Environmental Statement - Volume 4 - Chapter 3 - Appendix 3.5 Stage 4 Site Selection Report – Final Site Selection (App Doc Ref 5.4.3.5) [AS-078], Community assessment Land take, property and business viability was one of the Community Assessment criteria used to select the site for the new WWTP. The commentary for that criteria being used to evaluate Sites 1, 2 and 3 can be found in sections 3.3, 4.3 and 5.3 respectively.

During the evolution of the scheme, the applicant has made changes and refinements to the Proposed Development, and/or the land rights sought. These include the following.

1. Red House Close (Parcel 021s on Sheet 2 of the Land Plans see (App Doc Ref 4.4) [AS-151]) – moving Shaft 4 further east of its original location (see ExQ1.8.14 above).
2. Red House Close and Poplar Hall (close to Parcel 021s on Sheet 2 of the Land Plans (App Doc Ref 4.4) [AS-151]) – removal of ventilation shaft from the Transfer Tunnel (see Table 4-12 (page 40 to 41) of the Consultation Report (App Doc Ref 6.1) [AS-115]).
3. Parcel 036a (see Sheet 6 of the Land Plans (App Doc Ref 4.4) [AS-151]) – changing the eastern boundary of the new WWTP site to regularise field boundaries following a request by the landowner.
4. Waterbeach Pipeline North – changes to some construction access routes to accommodate landowners' and occupiers' requests. For example, at Grange Farm (see Sheet 8 of the Land Plans (App Doc Ref 4.4) [AS-151]).

*ExQ1.21.29* – The Outline Commissioning Plan is to be submitted at Deadline 4.

*Applicant's post hearing submission [REP1-082] Appendix C* – The Applicant believes that the reference to remediation should be decommissioning and therefore is responding on this basis. The decommissioning of the existing Cambridge WWTP is due to commence as soon as flows are diverted to the Proposed Development. There will be an overlap between the decommissioning and commissioning phases.

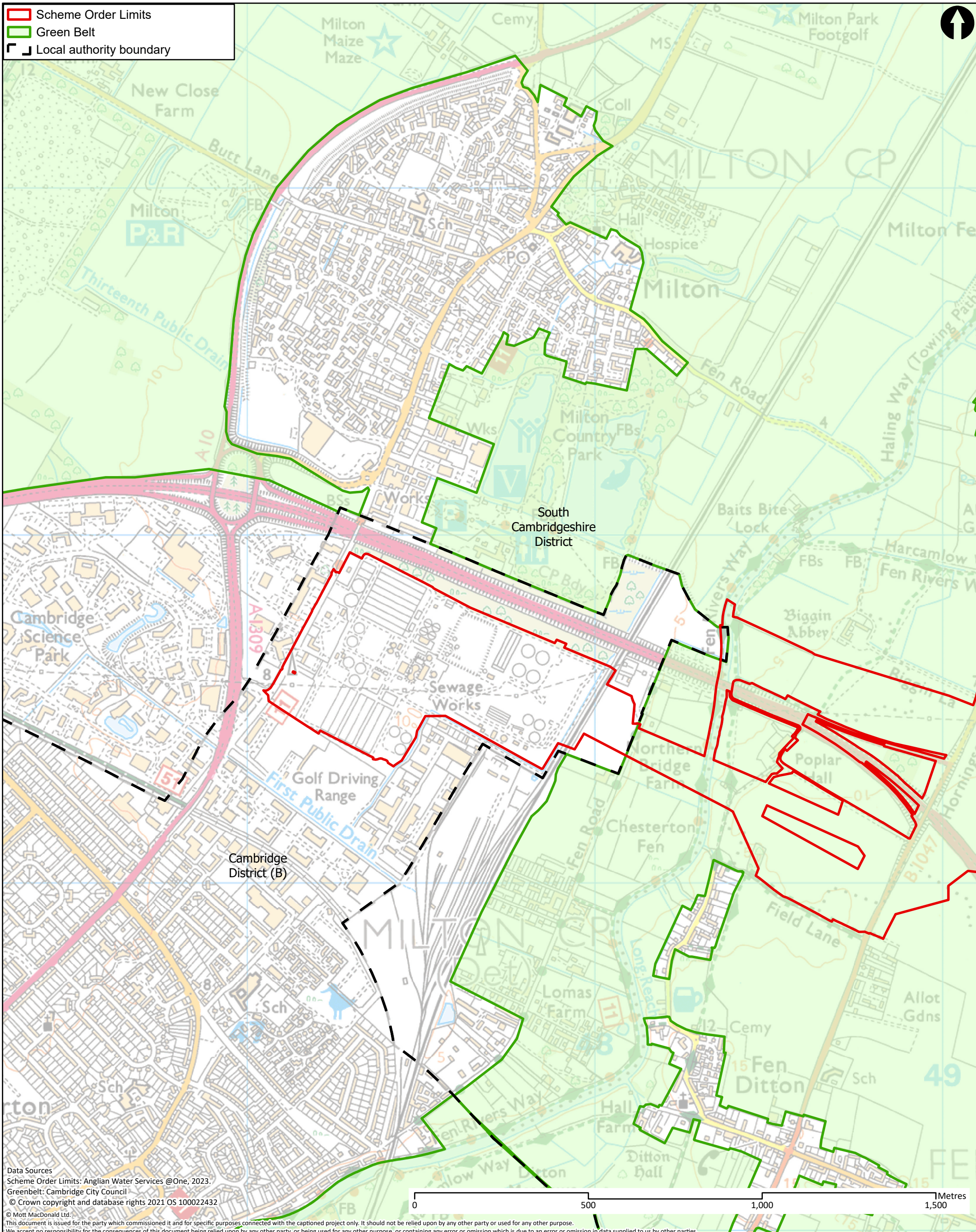
## 12 Appendices

- A) Green Belt Map
- B) Biodiversity Gain Requirement 25 Briefing Note
- C) Note on Ms Cotton's Septic Tank
- D) Technical Note: BNG Offsite River Units
- E) Local Diversion of Horningsea Road
- F) AIL Access to Waterbeach Pipeline Construction Corridor
- G) Transport Plan Schedule
- H) Applicant's response to ExA ISH3 Hearing Actions: Tree Planting on Bunds
  - i) Review of traffic movements and parking provision
- J) Exclusion Zone Figure

## A) Green Belt Map



- ▬ Scheme Order Limits
- ▬ Green Belt
- Local authority boundary



Data Sources  
 Scheme Order Limits: Anglian Water Services @One, 2023.  
 Greenbelt: Cambridge City Council  
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<div style="text-align: center;"> <p><b>MOTT MACDONALD</b></p> </div> <p>22 Station Road Cambridge CB1 2JD United Kingdom</p> <p>T +44 (0)20 8774 2000 F +44 (0)20 8681 5706 W mottmac.com</p>	<p>Client</p> <div style="text-align: center;"> </div>	<p>Title</p> <p>Cambridge Waste Water Treatment Plant Relocation Project Green Belt</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Drawn</td> <td>SLG</td> </tr> <tr> <td>Checked</td> <td>CS</td> </tr> <tr> <td>Approved</td> <td>CS</td> </tr> <tr> <td colspan="2">Scale at A3</td> </tr> <tr> <td colspan="2">1:10,000</td> </tr> </table>	Drawn	SLG	Checked	CS	Approved	CS	Scale at A3		1:10,000								
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<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Rev</th> <th>Date</th> <th>Drawn</th> <th>Description</th> <th>Ch'k'd</th> <th>App'd</th> </tr> </thead> <tbody> <tr> <td>P1</td> <td>19/01/24</td> <td>SLG</td> <td>First Draft</td> <td>SLG</td> <td>CS</td> </tr> </tbody> </table>	Rev	Date	Drawn	Description	Ch'k'd	App'd	P1	19/01/24	SLG	First Draft	SLG	CS	<p>Drawing Number</p> <p style="text-align: center;">AW/CWWTPR/MM/ISH3/GB001</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;">Security</td> <td style="width: 33%;">Status</td> <td style="width: 33%;">Rev</td> </tr> <tr> <td>STD</td> <td>PRE</td> <td>P1</td> </tr> </table>	Security	Status	Rev	STD	PRE	P1
Rev	Date	Drawn	Description	Ch'k'd	App'd															
P1	19/01/24	SLG	First Draft	SLG	CS															
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## **B) Biodiversity Gain Requirement 25 Briefing Note**

## 1 Summary

1.1.1 This briefing note presents an overview of how 20% Biodiversity Net Gain (BNG) for the Proposed Development will be secured through Requirement 25 as drafted within the Draft Development Consent Order (dDCO) (App Doc Ref 2.1) submitted at Deadline 4. This briefing note talks through the wording of Requirement 25, what the updated BNG report (App Doc Ref 5.4.8.13) submitted to discharge this will include, and the links between the habitat management and monitoring section of the BNG report with the following documents:

- Detailed Construction Environment Management Plans (CEMP) to be prepared to align with the requirements of the Code of Construction Practice (CoCP) Part A (App Doc Ref 5.4.2.1) secured under Requirement 9,
- The detailed Outfall Management and Monitoring Plan (OMMP) to align with the Outline OMMP (App Doc Ref 5.4.8.24) secured under Requirement 10, and
- The detailed management and monitoring plan as required by the Landscape, Ecological, Recreational Management Plan (LERMP) (App Doc Ref 5.4.8.14)) secured under Requirement 11.

## 2 Draft Development Consent Order Schedule 2 Requirement 25

2.1.1 Anglian Water Services Limited (the 'Applicant') updated the Draft Development Consent Order (App Doc Ref 2.1 [REP3-003]) at Deadline 3 to include Requirement 25 for Biodiversity Net Gain (BNG). Requirement 25 was prepared to consolidate the securement and delivery of BNG for the Proposed Development. The Requirement has subsequently been updated for Deadline 4 and states:

*Biodiversity net gain*

*25.—(1) No phase of the authorised development is to be commenced until an updated biodiversity net gain report has been submitted to and approved by the relevant planning authority.*

*(2) The updated biodiversity net gain report submitted for approval must include:*

*(a) how the measures contained within it deliver and secure twenty percent biodiversity net gain for the whole of the authorised development excluding any biodiversity net gain to be provided as river units;*

*(b) details of measures to deliver and secure twenty percent biodiversity net gain comprising river units within or outside of the Order limits; and*

*(c) details of the habitat management and monitoring of the biodiversity net gain for the whole of the authorised development.*

*(d) an updated biodiversity metric calculation or an explanation of why a biodiversity metric calculation is not necessary.*

*(3) The updated biodiversity net gain report may be revised from time to time in accordance with requirement 6.*

*(4) The construction and operation of the authorised development must be carried out in accordance with the approved updated biodiversity net gain report.*

*(5) For the purposes of this requirement, “biodiversity metric calculation” means a calculation in accordance with the metric in Appendix D of the biodiversity net gain report.*

2.1.2 Requirement 25 replaces those elements of Requirements 10 and 11 that previously secured BNG and were referenced in the Applicant’s responses to ExA’s ExQ1 (App Doc Ref 8.3) [REP1-079] and Relevant Representations (RR) (App Doc 8.2) [REP1-078]. These Requirements cover:

- Requirement 10 Outfall
- Requirement 11 Landscape, ecological and recreational management plan.

2.1.3 Requirements 10 and 11 were also updated for Deadline 3 to remove reference to BNG.

2.1.4 Requirement 8 (Code of Construction Practice (CoCP)) has not previously referred to BNG in its wording, however, it has been referred to as a mechanism in supporting BNG for temporary works where habitats are reinstated and the measures for this are detailed in the CoCP.

### **3 BNG Report**

3.1.1 The Applicant has updated the BNG Report (App Doc Ref 5.4.8.13) for Deadline 4 to include a reference to Requirement 25. The report will likely be updated following detailed design and to follow Requirement 25(1), which states that *“No phase of the authorised development is to be commenced until an updated biodiversity net gain report has been submitted to and approved by the relevant planning authority”*.

### **4 BNG and link to other draft DCO Requirements**

4.1.1 The diagram below presents an overview of what information will be provided during discharge of Requirement 25 and how the Applicant believes the wording of Requirement 25 secures the delivery of habitat creation, reinstatement, management and monitoring in line with 20% BNG.



**Schedule 2 Requirement 25 BNG**

**Updated BNG Report (to include an updated Biodiversity Metric Calculation)**  
Submitted to and approved by the LPA prior to commencement of any phase of the authorised development.

**The Updated BNG Report will include:**

- detail on measures to deliver and secure 20% BNG for the whole of the authorised development.
- details on measures to deliver and secure the required river units within and outside of the Scheme Order Limits to meet 20% BNG.
- details of the habitat management and monitoring of the BNG for the whole of the authorised development.

**The Updated BNG Report will include details of the habitat management and monitoring of the BNG for the whole of the authorised development.**  
It will include additional detail including planned management activities and the link to the habitat and condition targets and a 30 year monitoring schedule. It will signpost out to linked documents (listed below) that also cover habitat management and monitoring across the authorised development.  
Off-site river units will likely be covered by a habitat management and monitoring plan produced by the off-site provider. This will also be detailed in the updated BNG report.

**Schedule 2 Requirement 8 Code of Construction Practice (CoCP)**

The CoCP Includes details on reinstatement of habitats outside of the LERMP landscape masterplan area and OMMP ditch creation habitat within Work No. 39 area (App Doc Ref 4.3).

**Schedule 2 Requirement 10 Outfall**

Includes details on the provision of a:

- detailed construction outfall management and monitoring plan (OMMP).
- detailed operational OMMP.

The OMMPs will include detail on ditch, reedbed and other neutral grassland habitat creation (bordering the new ditches), and monitoring and maintenance measures in the proposed northern area within Work No. 39.

**Schedule 2 Requirement 11 Landscape, ecological and recreational management plan (LERMP)**

A detailed LERMP will be submitted to and approved by the LPA prior to commencement of any phase of the authorised development.

## C) Note on Ms Cotton's Septic Tank

## Contents

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# 1 Introduction

## 1.1 Action arising from Issue Specific Hearing 3

### Issue relating to septic tanks

1.1.1 This technical note and assessment is produced in response to Action No 82 in the Action Points from Issue Specific Hearing 3 [EV-008v]. Action No 82 is described as follows:

- *'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.'*

1.1.2 Action No 82 was requested following a comment raised by Liz Cotton during Issue Specific Hearing 3. The comment concerned whether there was an assessment of the potential impacts on septic tanks as a result of construction of the transfer tunnel element of the Proposed Development in the vicinity of Poplar Hall. However, septic tanks for individual properties are small scale, localised engineering features with a very limited impact on the water environment, hence they have not been considered in the Environmental Impact Assessment (EIA).

1.1.3 The Applicant indicated that an assessment would be provided concerning the potential for septic tanks to be affected by the Proposed Development.

1.1.4 Following Issue Specific Hearing 3, the Applicant has been in contact with Liz Cotton by email. Liz Cotton has provided some further information concerning the septic tank at Poplar Hall, and also the septic tank at Poplar Hall Farm nearby. The information has been used in this assessment.

## 1.2 Location of Poplar Hall

1.2.1 Poplar Hall is located next to Poplar Hall Farm, just to the south of the A14 and about 150m east of the River Cam (Sheet 2 of Works Plans (App Doc Ref 4.3) [AS-150]). The property is elevated slightly above the open land adjoining the river bank. Liz Cotton has indicated that:

- the septic tank for Poplar Hall is located in a small copse at the northern extent of the property, between Poplar Hall and the River Cam; and,
- the septic tank for Poplar Hall Farm is located in an area of ground a few metres from a field boundary, about 20m east of Poplar Hall.

1.2.2 No details are available for any drainage system discharging from either of these septic tanks.

## 1.3 Background

- 1.3.1 In general, septic tanks for dwellings or other similar properties comprise one or more tanks made of an impermeable material and buried to a depth usually up to about two metres below ground. The tanks receive the effluent from the property. Settlement occurs within the tank, with excess liquid then overflowing via a pipe located at a high level in the tank, to a pit or drainage network. The excess liquid effluent then infiltrates the soil from the pit or drains.
- 1.3.2 The bedrock geology in the area of Poplar Hall comprises the lowermost part of the West Melbury Marly Chalk Formation overlying Gault Formation. The contact between these formations is present between Poplar Hall and the River Cam. Superficial deposits comprising alluvium (clay, silt, sand and gravel) are present along the River Cam but do not extend as far east as Poplar Hall. Based on the geology, therefore, it is likely that the septic tank was constructed in sub-soil materials and possibly in the top of West Melbury Marly Chalk Formation and Gault Formation underlying the sub-soil. Any pit or drains through which liquid effluent soaks away are probably located in shallow deposits in the area of the tank, or in slightly lower lying ground towards the river. As Gault Formation comprises mainly clays and silts, and is classified by the Environment Agency as an unproductive aquifer (effectively a non-aquifer), it is unlikely that any effective soakaway from pit or drains would occur in the Gault Formation.
- 1.3.3 For Poplar Hall Farm it is likely that the septic tank was constructed in sub-soil materials, and possibly in the top of West Melbury Marly Chalk Formation underlying the sub-soil.

## 2 Assessment

### 2.1 Potential Impact of the Transfer Tunnel

- 2.1.1 The waste water transfer tunnel is located in the Gault Formation, at a depth of more than 15m below ground level and, at the closest point, about 120m to the south or south west of the location of the septic tanks at Poplar Hall and Poplar Hall Farm. The presence of the tunnel should, therefore, have no effect on the operation of the septic tanks and any associated drainage system.
- 2.1.2 Intermediate Shaft 4, giving access to the tunnel, is located on the east side of the River Cam (Design Plans - Sewage Tunnel and Longitudinal Sections (App Doc Ref 4.12) [APP-026]), and also about 120m from the septic tanks at Poplar Hall and Poplar Hall Farm. The shaft would be constructed from the surface down to the tunnel alignment and lined or grouted through any superficial deposits, West Melbury Marly Chalk Formation and Gault Formation above the tunnel. It will be backfilled after use. The shaft is not in a location between the septic tank at Poplar Hall and the river in which drainage from the tank may be present. In addition, there are farm buildings located between the septic tank for Poplar Hall Farm and the shaft, indicating that drainage from the septic tank is very unlikely to extend anywhere within or to the south of the

area of these buildings. The shaft is also over 100m from both septic tanks. Construction and backfilling of the shaft should not, therefore, affect the operation of the septic tanks and any associated drainage systems.

2.1.3 Another property, Red House Close is located about 150m south west of Poplar Hall. Intermediate Shaft 4 is about 70m east of the buildings/development at Red House Close, in a field area at a slightly higher elevation than Red House Close. No details regarding possible presence of a septic tank and associated drainage are known for this property. However, the location of Intermediate Shaft 4, about 70m east of Red House Close, indicates that the shaft is unlikely to intercept any septic tank or associated septic tank drainage.

2.1.4 Nonetheless, the Applicant will consult with the owners of Poplar Hall Farm and Red House Close to determine the location of any septic tanks and/or associated drainage. In the unlikely event that any further action was necessary the Applicant will, at its own cost, seek to agree with the owner appropriate measures proposals for:

- monitoring any potential impacts from the construction of the Proposed Development on the disposal of effluent from the owner's property; and,
- implementing reasonable and proportionate measures to remedy any such impacts, if reasonably required, which, for the avoidance of doubt may include the relocation of the septic tank or any affected sections of the associated drainage.

2.1.5 In the unlikely event that they were required, these measures might include the agreed relocation of the septic tank or any affected sections of the associated drainage.

## 2.2 Potential impact of the Waterbeach pipeline

2.2.1 The part of the Waterbeach pipeline (Design Plans Waterbeach Pipeline Long section (App Doc Ref 4.14) [AS-156]) designed to potentially take flows into the existing Cambridge WWTP for an interim period (as a reasonable worst case scenario) is located in the vicinity of Poplar Hall, as follows:

- approximately 200m to the south and south west of Poplar Hall along the closest section of the pipeline; and,
- approximately 30m from the buildings/development at Red House Close, at the closest point.

2.2.2 At a distance of approximately 200m, construction of the pipeline should have no impact on the septic tank and associated drainage for Poplar Hall, or for Poplar Hall Farm located adjacent to Poplar Hall.

2.2.3 The section of the Waterbeach pipeline located closest to the Red House Close is proposed for construction by a trenchless technique, in order to complete a crossing below the River Cam. The crossing will be constructed by directional drilling.

Therefore, the pipeline will be installed without the need for excavating a trench from the surface. The pipeline will be at a depth of approximately 3m to 6m below ground level in the vicinity of Red House Close.

2.2.4 As already indicated, no details are known for Red House Close regarding possible presence of a septic tank and associated drainage. As a result, the potential impact of the Waterbeach pipeline on any septic tank and associated drainage cannot be assessed for the property. However, as with Intermediate Shaft 4, the presence of any septic tank and drainage will be checked with the property owner well in advance of any construction taking place associated with the pipeline. Taking into account the depth and location of the pipeline, it is unlikely, but still possible, that construction could affect the operation of a septic tank at Red House Close, or might intercept any drainage from a septic tank. If found to be the case, then the Applicant would be responsible for:

- monitoring any potential impacts from the construction of the Proposed Development on the disposal of effluent from the owner's property; and,
- implementing reasonable and proportionate measures to remedy any such impacts, if reasonably required, which, for the avoidance of doubt may include the relocation of the septic tank or any affected sections of the associated drainage.

2.2.5 These measures might also include the agreed relocation of the septic tank or any affected sections of the associated drainage.



## **D) Technical Note: BNG Offsite River Units**

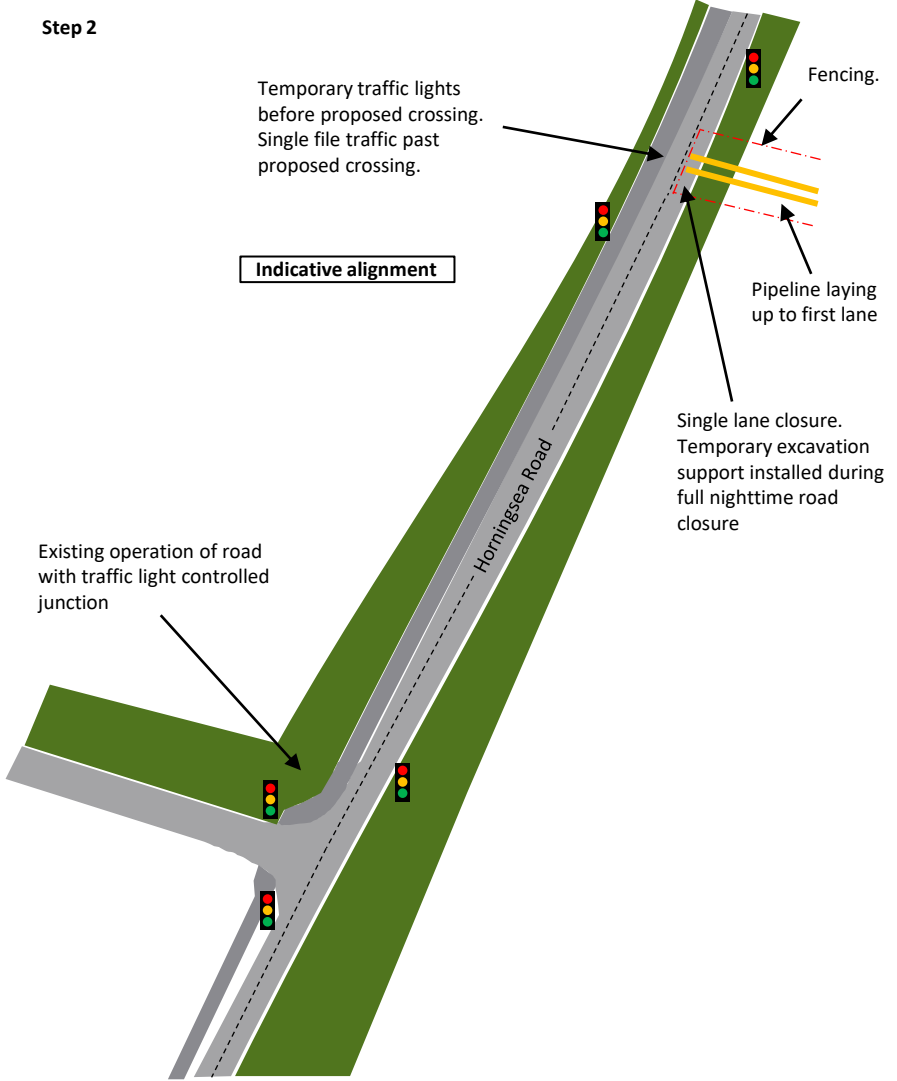
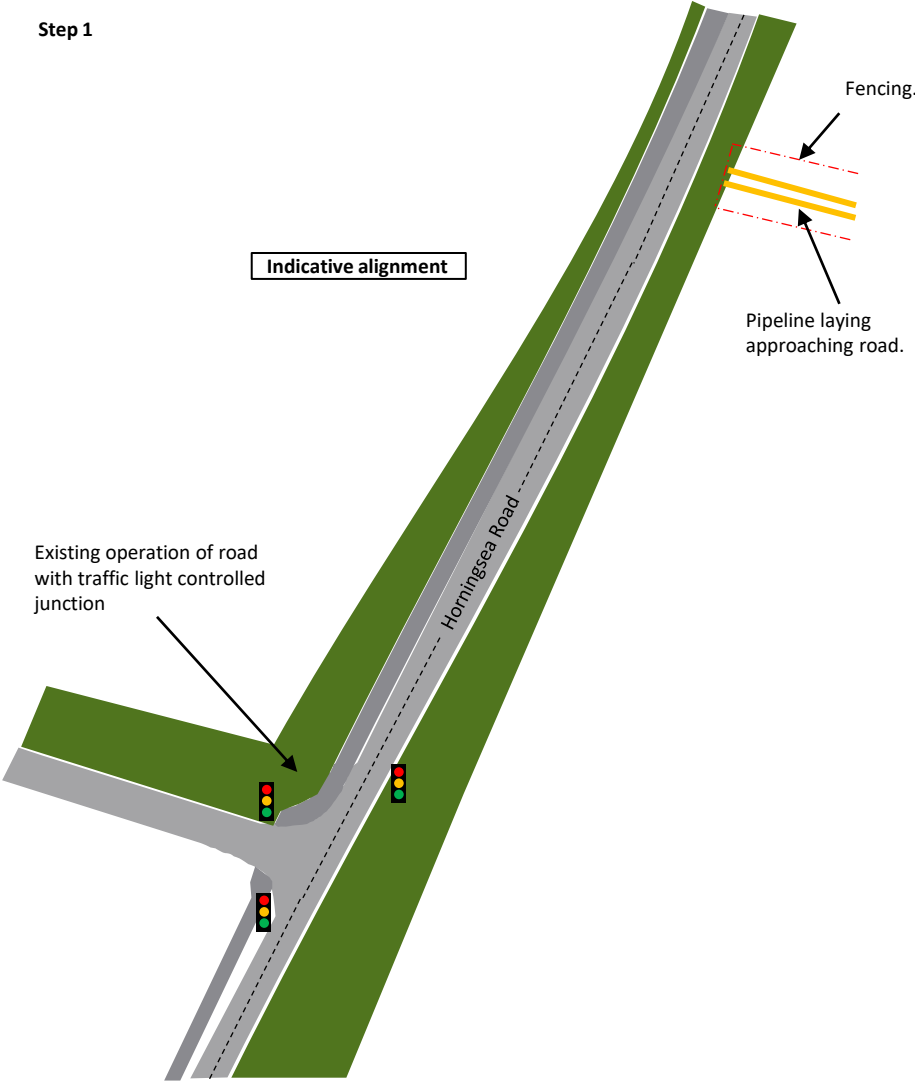
## Technical Note

### Response to request at ISH3 Environmental Matters Hearing regarding securing off-site BNG river units

Tuesday 17 <sup>th</sup> January 2024
<b>Project:</b> Cambridge Waste Water Treatment Works Relocation Project
<b>The purpose of this technical note:</b> <ul style="list-style-type: none"><li>Respond to action on Applicant to provide examples of sites or projects or schemes where the BNG for the off site river units could be secured.</li></ul>
<b>Background:</b> <p>For the Ecology item during ISH3 Environmental Matters Hearing on the 11th January 2024 an action arose to provide a short note to provide <i>'examples of sites or projects or schemes where the BNG for the off site river units could be secured'</i></p>
<b>Examples of sites or projects or schemes where the BNG for the off site river units could be secured:</b> <p><u>Despite seeking suitable projects locally on the River Cam or catchment none have been found:</u></p> <p>Since November 2023 calls have been held with the following local representatives of relevant organisations including:</p> <ul style="list-style-type: none"><li>• [REDACTED] - Biodiversity Officer, Cambridge City Council</li><li>• [REDACTED] - Project lead for Cambridge Chalk stream project</li><li>• [REDACTED] - Water for Wildlife Officer, The Wildlife Trust for Bedfordshire, Cambridgeshire &amp; Northamptonshire</li><li>• [REDACTED] - Conservation Officer East, Wild Trout Trust</li><li>• [REDACTED] - Clerk to Great Shelford Parish Council, Cambridgeshire</li></ul> <p>Although potential projects were discussed, none of these were at a stage where credit were available to the Applicant and more work and funding would be required to get to a delivery stage. The local Wildlife Trust representative feedback that the Trust would not be able to partake in providing a project until CWWTPRP gained consent as the Trust is holding an objection to the proposed project.</p> <p>Other investigations have included reaching out to Contractors involved in the delivery of projects including Five Rivers. A project was identified but on approaching the Client and landowner, a Cambridge University College, there was no appetite to provide BNG river units to others.</p> <p><u>No work yet undertaken to seek projects outside of the River Cam and its catchment</u></p> <p>We have not started seeking any projects outside of the River Cam and its catchment as this is counter to the BNG guidance.</p>

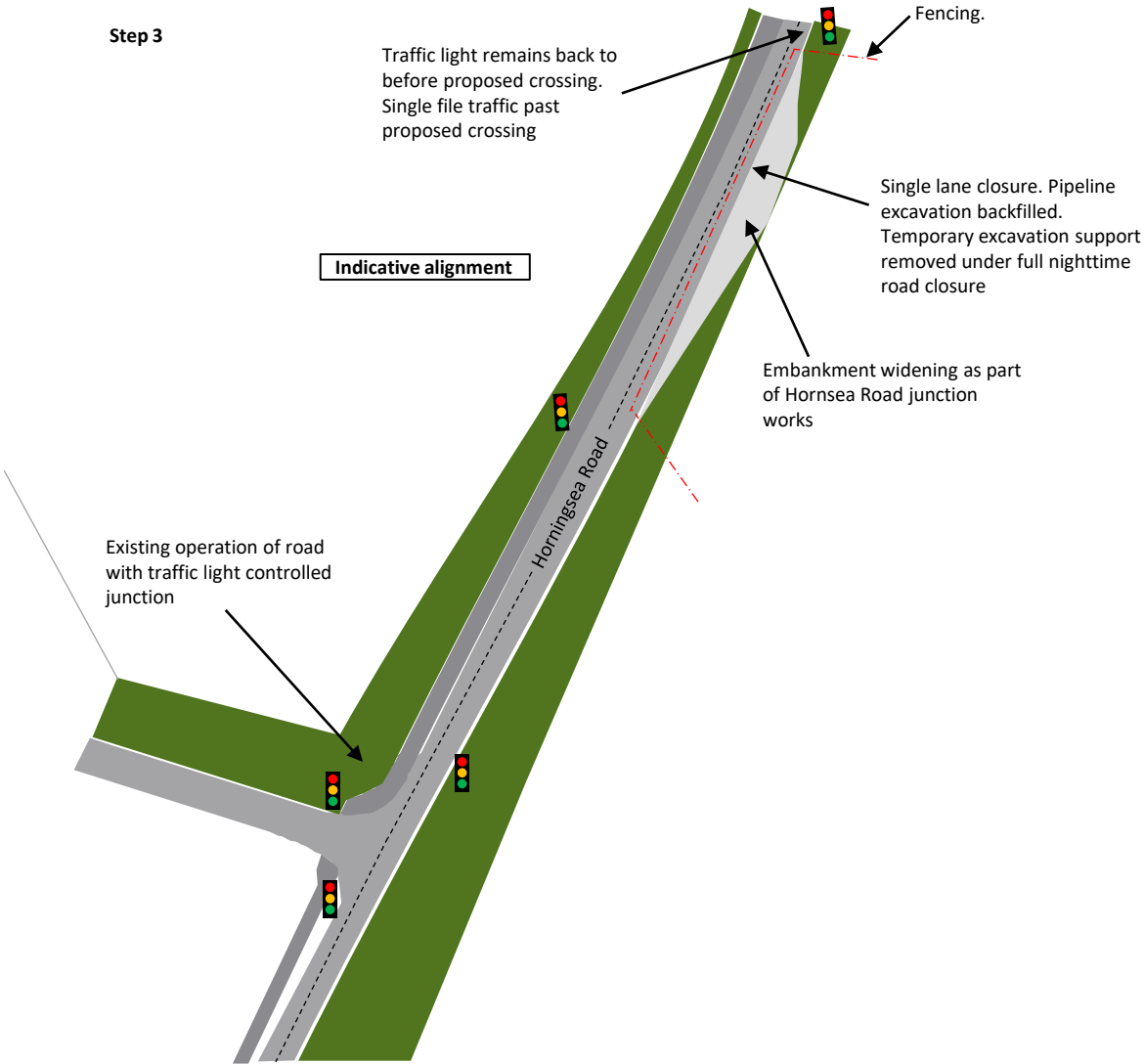
## **E) Local Diversion of Horningsea Road**

**Local diversion of  
Horningsea Road whilst  
pipes are laid in that  
location**

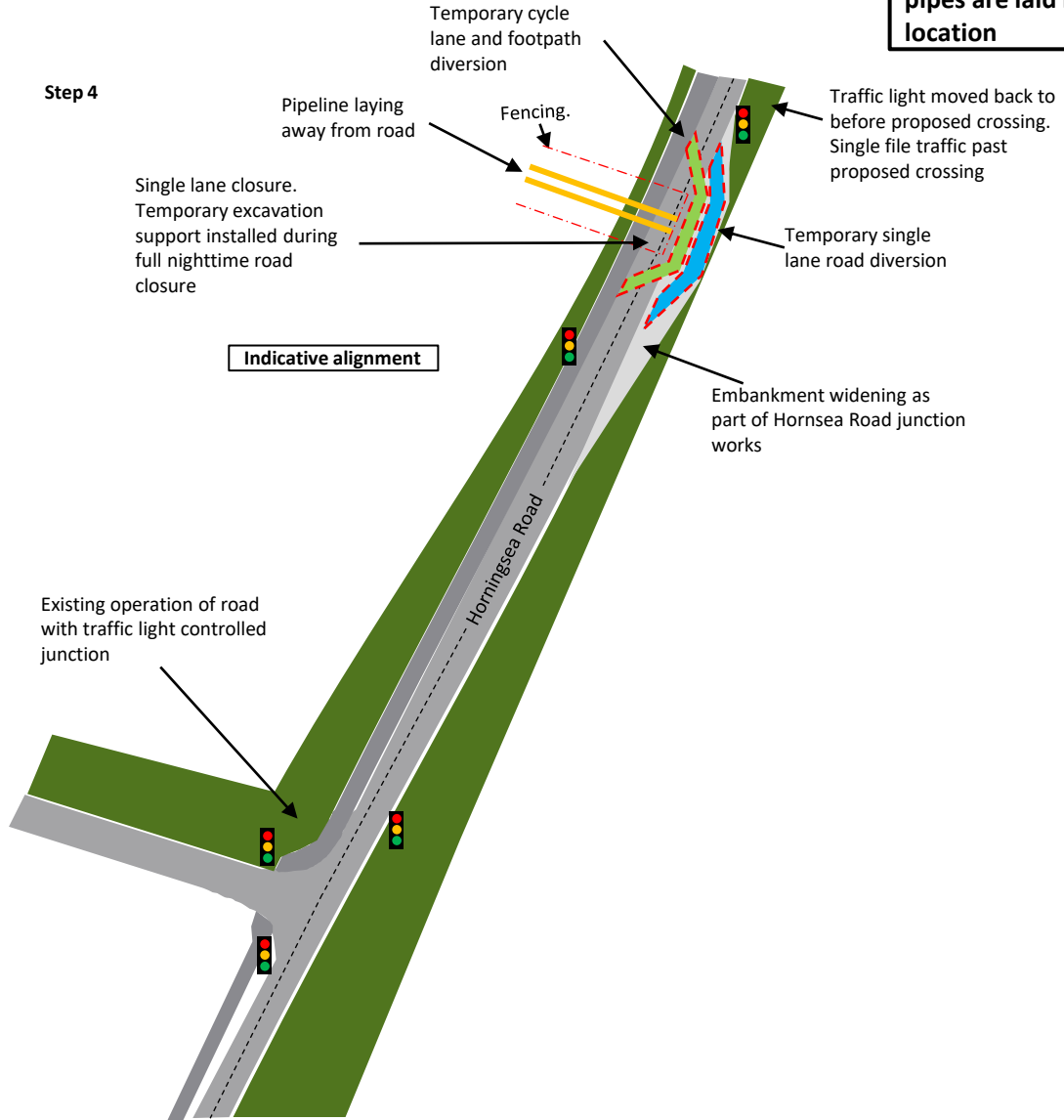


**Local diversion of  
Horningsea Road whilst  
pipes are laid in that  
location**

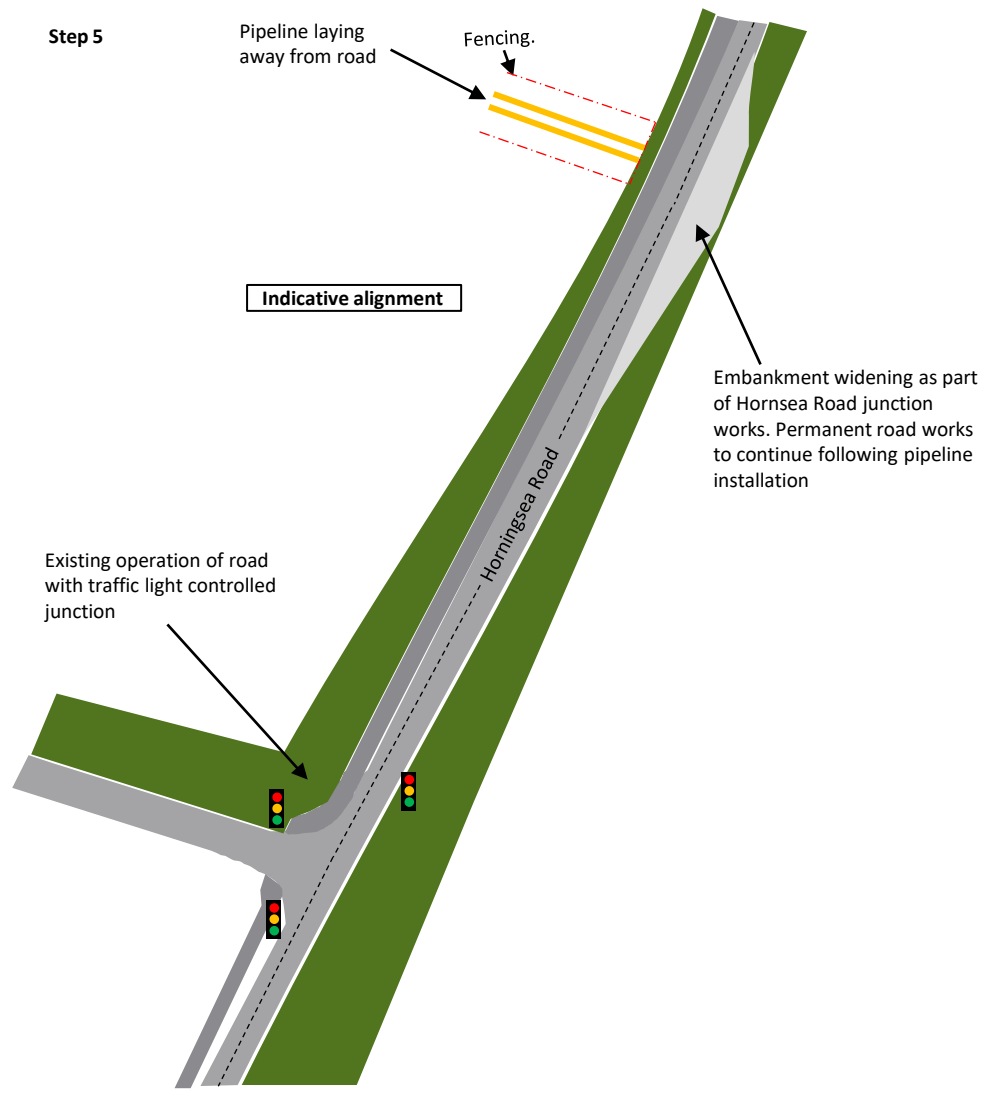
**Step 3**



**Step 4**



**Local diversion of  
Horningsea Road whilst  
pipes are laid in that  
location**



## **F) All Access to Waterbeach Pipeline Construction Corridor**



# Abnormal Indivisible Load (AIL) Access to the Waterbeach Pipeline construction corridor

## AIL Vehicle

The most onerous construction vehicles accessing the Waterbeach Pipeline construction sites will be either a max legal HGV or low loader.

The vehicle required to carrying the Directional Drilling (DD) rig can use a standard articulated low loader with dimensions of 16.633m in length, 2.5m in width, and 3.396m in overall body height. The gross vehicle weight is expected to be approximately 55 tonnes. This is classed as an abnormal load as it exceeds 44 tonnes. These dimensions are the same as the Low Loader dimensions currently used for vehicle tracking for the proposed construction routes. Therefore, no further AIL tracking is required as a standard low loader is currently able to manoeuvre the proposed access routes.

## Specific Regulations

The dimensions and weights of vehicles used on British roads are regulated by the Road Vehicles (Construction & Use) Regulations 1986 (C&U) Regs and the Road Vehicles (Authorised Weight) Regulations 1998 (AW) Regs. However, Special Types of vehicles are those which don't meet the C&U and AW Regs but can be used outside these rules under the authority of the Road Vehicles (Authorisation of Special Types) (General) Order 2003 (STGO).

The AIL vehicle is expected to be in the Special Types General Order (STGO) Category 2 class. Therefore, the vehicle must have a minimum of 6 axles, a maximum axle weight of 12,500 kgs, and display an STGO Cat 2 plate to the front of the tractor unit. A two working days' notice to the local highway and bridge authorities is required in relation to weight, and the dimensions may need to be given to the police. A plate must be fitted to the vehicle: this must be marked 'Special Types Use' and should show the weights for gross, train, and axle weights. Furthermore, the AIL vehicle is restricted to a speed limit of 30mph along the proposed access routes as required by the STGO Category 2 requirements.

It is expected that movement order notices will not be required as the AIL vehicle is less than 150 tonnes, less than 6.1m wide, and less than 30m in rigid length.

## Movement Frequency

The DD rigs will only be required at one end of the directional drilling bore and will be present until the pipes have been laid. Two movements of the AIL vehicle will be required: one to the site and a return trip once the DD works have been completed.

## Mitigation Measures

Mitigation measures for AIL movements is set out in Appendix 19.7 of the CTMP Section 4.2.4. These measures apply to all AIL routes, the main site and the Waterbeach pipeline.

## Structures

The AIL vehicle route will cross a number of structures. The bridge structures over the A14 have been confirmed by National Highways to be sufficient for the AIL movements proposed.

The AIL vehicle construction route to site access CA20 requires access over Clayhithe Bridge. Cambridgeshire County Council (CCC), they have confirmed that the bridge as a guaranteed structural capacity of 40 tonnes. Further detailed structural assessment work is being carried out by CCC and the applicant to determine whether the bridge has sufficient load capacity for the proposed AIL vehicle. The results of this assessment and any mitigation measures associated with this will be provided at Deadline 5.

## Level Crossings

The following level crossings are to be utilised to provide access to the construction sites:

- Fen Road, Chesterton, Cambridge (access to Waterbeach pipeline and Transfer Tunnel pipeline),
- Clayhithive Road, Waterbeach (access to Waterbeach pipeline)
- Bannold Road (Waterbeach (access to Waterbeach pipeline).

Each of these level crossings provides managed rail crossing points on the public highway. Each level crossing has associated warning signage which must adhere to by road users.

- Fen Road, Chesterton, Cambridge (double barriers, standard warning signs, Safe height 16' 6"),
- Clayhithie Road, Waterbeach (single barriers, standard warning signs, warning sign: Safe height 16' 6", warning sign: Risk of grounding, warning sign stating 'Drivers of Large or slow vehicles must phone and get permission to cross (large means over 55' long or 9'6" wide or 38 tonnes total weight, slow means 5mph or less', phone at crossing)
- Bannold Road (single barriers, standard warning signs, warning sign: Safe height 16' 0", warning sign stating 'Drivers of Large or slow vehicles must phone and get permission to cross (large means over 55' long or 9'6" wide or 38 tonnes total weight, slow means 5mph or less', phone at crossing)

The above warnings signs and control measures are standard measures at level crossings. The AIL vehicle is over 38 tonnes. At Clayhithe Road and Bannold Road level crossings the AIL will need to stop and phone the signalman prior to crossing the level crossing. The AIL construction traffic proposed to use these level crossings to access the construction sites will fully comply with these control measures to safely traverse the railway at the level crossings.

Bannold Road level crossing has a safe height of 16' 0" (4.9 meters) due to the electrified overhead lines, which is the lowest of the three level crossings. The overall height, including the DD rig and the body height of the low loader, is approximately 4.8 meters. The height of the AIL vehicle is lower than the lowest safe height for the level crossings and therefore the AIL vehicle can cross at the level crossings.

## Junction Movements

The AIL vehicle is a standard low loader. An assessment of the construction routing for low loaders has been carried out as part of the Transport Assessment. Therefore, no further AIL tracking is

required as a standard low loader is currently able to manoeuvre the proposed construction access routes.

## G) Transport Plan Schedule

The approving authority for each plan is Cambridgeshire County Council as the “relevant planning authority” for the purposes of the dDCO as defined in Article 2.

Plan or strategy	Related application document	Scope / purpose	Related DCO requirement	Consultees	Plan agreed
Phasing Plan	Prepared post consent	<ul style="list-style-type: none"> <li>A written scheme setting out the subsequent phase or phases of the construction of the Proposed Development and the works that form part of each phase</li> <li>This is to be submitted to and approved by the relevant planning authority</li> <li>Defines the phases for which relevant approved plans are sought prior to the commencement of that phase</li> </ul>	DCO Schedule 2 Requirement 3	Emergency service group Waterbeach Parish Councils	Agreed with Emergency Services
Construction environmental management plan	Code of Construction Practice Part A (App Doc Ref 5.4.2.1) Code of Construction Practice Part B (5.4.2.2)	<ul style="list-style-type: none"> <li>General measures to be implemented during construction whereby the specified controls are reflected in a construction environment management plan for the phase.</li> <li>Specific measures to a particular part of the Proposed Development controls are reflected in a construction environment management plan for the phase.</li> </ul>	DCO Schedule 2 Requirement 9 (CEMP). Alignment to the CoCP secured by Requirement 8 (CoCP).	Emergency service group Parish Councils National Highways	In review with CoCC
Community Liaison Plan	Community Liaison Plan (App Doc Ref 7.8)	<ul style="list-style-type: none"> <li>Detailed plan to be prepared relevant to the construction phases setting out communication methods for the timely dissemination of project information and mechanisms for raising issues and complaints in relation to the way the Proposed Development is being delivered</li> </ul>	DCO Schedule 2 Requirement 8 (CoCP) and Requirement 9 (CEMP) which includes the requirement to prepare a detailed community liaison plan which must accord with the measures set out in the community liaison plan	Emergency service group Waterbeach Parish Councils Primary school – Fen Ditton Primary School – Waterbeach	Agreed with Emergency Services
Construction Traffic Management Plan	Construction Traffic Management Plan (App Doc Ref 5.4.19.7)	<ul style="list-style-type: none"> <li>A detailed plan setting out the measures to be adopted during construction for the management of traffic movements affecting the local and strategic highway network including abnormal loads , and measures for the management of assets used by non-motorized users and management of impacts to the public right of way network</li> </ul>	DCO Schedule 2 Requirement 8 (CoCP) and Requirement 9 (CEMP) (App Doc Ref 2.1) which requires a detailed construction traffic management plan which must accord with the measures set out in the construction traffic management plan	CoCC SCDC National Highways: in particular in relation to AILS, use of SRN, works to Horningsea road bridge, marshalling at the slip road Primary school – Fen Ditton Other local developers: Waterbeach station relocation , Waterbeach New Town	In review with CoCC  Agreed with National Highways  In review with Waterbeach Development Company

Action Point 11

Plan or strategy	Related application document	Scope / purpose	Related DCO requirement	Consultees	Plan agreed
Construction Worker Travel Plan	Construction Worker Travel Plan (5.4.19.9)	<ul style="list-style-type: none"> <li>A detailed plan that identifying a coordinated set of measures for improving travel opportunities to / from the proposed development during construction for construction staff so as to minimise motorised journeys to and from the site.</li> </ul>	DCO Schedule 2 Requirement 8 (CoCP) and Requirement 9 (CEMP) which includes the requirement to prepare a detailed construction worker travel plan must accord with the measures set out in the comm construction worker travel plan .	Depends on phasing and number of discrete plans relative to different work sites SCDC CCC	In review with CoCC
Operational Worker Travel Plan	Operational Worker Travel Plan (App Doc Ref 5.4.19.8)	<ul style="list-style-type: none"> <li>A detailed plan that identifying a coordinated set of measures for improving travel opportunities to / from the Proposed WWTP In operation so as to minimise motorised journeys to and from the site and encourage a more sustainable forms of transport.</li> </ul>	DCO Schedule 2 Requirement 12 (Operational workers travel plan)	CCC – with respect to wider travel demand measures	In review with CoCC
Operational Logistics Traffic Plan	Operational Logistics Traffic Plan (App Doc Ref 5.4.19.10)	<ul style="list-style-type: none"> <li>A detailed plan relevant to the operation of the relocated WWTP used to optimise the delivery and operational movements to and from the proposed WWTP, in particular to avoid identified peak times and minimise the contribution to peak volumes within eh local and strategic road network.</li> <li>A plan that evolves over time and may from time to time be revised in consultation with the relevant local authority</li> </ul>	DCO Schedule 2 Requirement 19 (Operational logistics traffic plan)	CCC – with respect to wider travel demand measures	In review with CoCC

## H) Tree Planting on Bunds



## Contents

<b>1</b>	<b>Issue Specific Hearing 3 – Environmental Matters – Landscape and Visual/Design .....</b>	<b>3</b>
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# 1 Issue Specific Hearing 3 – Environmental Matters – Landscape and Visual/Design

## 1.1 Hearing Action Point 93

***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.***

Planting on artificially created earth bunds, embankments and cuttings is frequently carried out on projects such as new roads, railways and housing developments. Some examples below show the growth of planting on artificially created bunds and road embankments in central, eastern and southern England where climatic conditions are similar to those of the Proposed WWTP.

The typical specification for watering new planting on road schemes (Design Manual for Roads and Bridges, Clause 3008) states that planting should be watered to ensure establishment and survival and during periods of abnormally dry weather. However, watering is difficult to do on road sides because there are generally no piped water supplies nearby and watering using a bowser is not practicable at this scale where vehicle access is often limited. The Wadesmill and Stoke Hammond examples below were not watered at all as the schemes relied on replacing failed stock on an annual basis rather than watering but by year 5, on both schemes, the planting required thinning rather than replanting.

The planting on the earth bank surrounding the Proposed WWTP illustrated in the Landscape, Ecological and Recreational Management Plan (LERMP) (**Doc Ref 5.4.8.14**) [**AS-066**] will be watered for the first 5 years after planting if growing conditions require it. The watering regime is set out in the LERMP and there will be an easily accessible source of water within the Proposed WWTP.

### **Examples of landscape planting on earth banks, slopes and cuttings**

- 1. Aldi at Sawley, west of Derby, East Midlands. Planted in 2019.***



Source: Google Maps

The planting on artificially created bunds is well established and the trees appear to have grown to around 5-6m high after five years. They were planted at around 2.5-3m high (at standard size). It is not know if the trees were watered.

**2. A4146 Stoke Hammond Bypass, Buckinghamshire. Planted in 2007.**



Source: Google Maps

The trees and shrubs, planted at whip and transplant size (0.6m – 2m high), were planted on both cutting and embankment slopes in 2007 and the image shows approximately 17 years growth. Judging from the height of the lorry (HGVs are generally less than 4.5m high), the planting to the left has exceeded 7.5m high.



**3. A3 Hindhead Tunnel, Surrey. Planted in 2010.**



Source: Google Maps

The planting is well established on a steep slope (making watering difficult) and where the soils are sandy and free draining. The existing, darker woodland can be seen behind the lighter scheme planting, put in around 14 years ago, on the left and middle of the picture.

**4. Morcott Water Treatment Works, Rutland. Planted 2010.**



Source: Google Maps

The planting (circle in red), on an artificial earth bank, was carried out in 2010.

**5. *Morcott Water Treatment Works, Rutland. Planted 2010.***



Source: Google Maps

The planting on the earth bank within the site (visible beyond the fence and perimeter hedge on the left) is well established after 14 years growth. The planting may have been watered in the early years but is growing in an exposed, elevated position in Rutland, where it is windy much of the time. The planting is, judging by the clear stem heights of 1.8m, around 6-8m high.

**6. *Morcott Water Treatment Works, Rutland. Planted 2010.***





Source: Google Maps

The planting on the mound within the site (circled in red) is well established after 14 years growth.

**7. A10 Wadesmill Bypass, Hertfordshire. Planted in 2001-2002**



Source: Google Maps

The planting on the cutting slopes is well established after 20 years growth. This planting was not watered during the establishment period. (The mature tree on the left of the image was an existing tree, retained as part of the scheme).

**8. A10 Wadesmill Bypass, Hertfordshire. Planted in 2001-2002**



Source: Google Maps

Taking account of the height of the rabbit guards, (0.6m high) the trees are estimated to be around 9m high after 20 years. Even in winter, they still provide screening because they have developed dense, twiggy crowns over the years.



## **i) Review of traffic movements and parking provision**

## **Review of traffic movements and parking provision**

At ISH3, the Examining Authority noted potential discrepancies in the application documentation, including within and between the Environmental Statement Chapter 2 Project Description Chapter [REP3-017] and the Environmental Statement Chapter 19 Traffic and Transport Chapter [REP3-021] and its appendices. These discrepancies related to the reporting of traffic modelling and to the provision of car parking spaces.

The Applicant has reviewed these documents and associated supporting data, including the underlying modelling and analysis supporting the Transport Assessment and Environmental Statement Traffic and Transport Chapter.

This review has highlighted a number of issues which need to be rectified. While none of these rectifications are expected to be material in terms of the findings of the environmental impact assessment, they will require several minor amendments to be made to the application documents.

### **Traffic modelling**

The review of the traffic modelling and its reporting has uncovered an error that feeds into the traffic modelling.

This error has resulted in an over-estimation of background traffic flows, leading to an over-assessment of the level of congestion on affected junctions/road network, which could result in minor changes to the assessment of impacts in the construction and operation phase assessments.

Stakeholder engagement with both National Highways and Cambridge County Council is taking place to agree the implications, if any, of this error. Considering the impacts are reduced, the Applicant considers that this will not result in any issues.

Additionally, as set out below, the traffic modelling requires amending to align with the revised parking provisions, updated for Deadline 4, and provide a revised commentary on associated impacts on the operation phase.

The Applicant will submit an updated Traffic and Transport Chapter and appendices, taking into account the amendments to the traffic modelling and the revised parking provision at Deadline 5.

### **Parking provision**

The parking provision at the site has been reviewed and updated in response to the ExA's questions and is proposed to be that listed in the table below.

		Cars/ vans	HGVs	Other (coach/ trailers)
<b>Car parking provision within bund</b>				
Operational workers	AW WWTP Operational and maintenance staff travelling to/from work	6		
	AW Technical/managerial visitors	2		
	Deliveries & contractors supporting the WWTP operation	2		
	Tanker/ HGV drivers using the office facilities and driving related to the WWTP operations	6		
Office workers	Office workers using the facility daily (RES/WROL and other AW staff <sup>1</sup> )	30		
<b>Other parking within bund</b>				
Operational site vehicles	HGV parking for sludge and cake transportation		7	
	Trailer parking for spare and replacement trailers			3
	Parking for AW Network Technician vans	10		
<b>Parking provision outside of bund</b>				

<sup>1</sup> Of the 138 workers currently registered to the Milton WWTP, 73 are office workers, utilising 30 desk spaces on a flexible basis. These include the RES/Water Recycling Operational Logistics operations and other Anglian Water functions (including the team at Cambridge WWTP who operate and maintain the local Cambridge waste water network).

Discovery Centre	Users of Discovery Centre (AW staff or educational visits)	10		
	Visitor disabled parking spaces	2		
	Coach for Discovery Centre visitors			1
<b>Total</b>		<b>68</b>	<b>7</b>	<b>4</b>

In combination, these parking areas would provide a total of 68 car / light vehicle spaces, 7 HGV spaces, with 4 other spaces (3 trailer parking spaces, and 1 coach parking space)

The relevant application documents required to be updated to accord with these updated parking numbers are listed below.

### **Amendments arising from amended car parking provision**

#### **Traffic modelling**

For the purposes of the traffic modelling, it will be assumed that a worst case for movements would be that all 68 car / light vehicle spaces outlined in the table above would be utilised during peak times, resulting in 136 vehicle movements per day during the peak hours. This is in addition to the operational HGV movements. These 136 vehicle movements during the peak hours represent a precautionary “worst case” assessment because most WWTP operational staff currently operate with shifts of 6AM-6PM and will therefore most likely be travelling outside of the peak traffic periods.

This differs from the modelling accompanying the application which utilised those movements set out at Table 2-1 of the Project Description [REP3-017], namely 46 cars or vans (96 movements).

In addition to these peak hour movements, there will be other operational car and LGV movements throughout the day. A precautionary level of 20 vehicles per hour has been assumed for these off-peak movements which would be sufficiently low not have an impact.

### **Consequential amendments to Environmental Statement and other documents**

The amendments to the documents consequent on the above changes are:

- ES Chapter 2 Project Description [REP3-017]
- Operational Workers Travel plan [APP—149]
- Outline Operational Logistics Travel Plan [AS-111]
- Draft Development Consent order (Part 18) [REP3-003]
- ES Chapter 19 Traffic and Transport [REP3-021]
- Construction Traffic Management Plan [REP1-044]
- Construction Workers Management Plan [APP-150]

In addition, the following documents will be reviewed to ensure consistency and may require minor amendment:

- ES Chapter 7 Air Quality
- ES Chapter 17 Noise and Vibration [AS-037]
- Design and Access Statement [AS-168]
- Design Plans – Proposed Waste Water Treatment Plant [REP1-019]

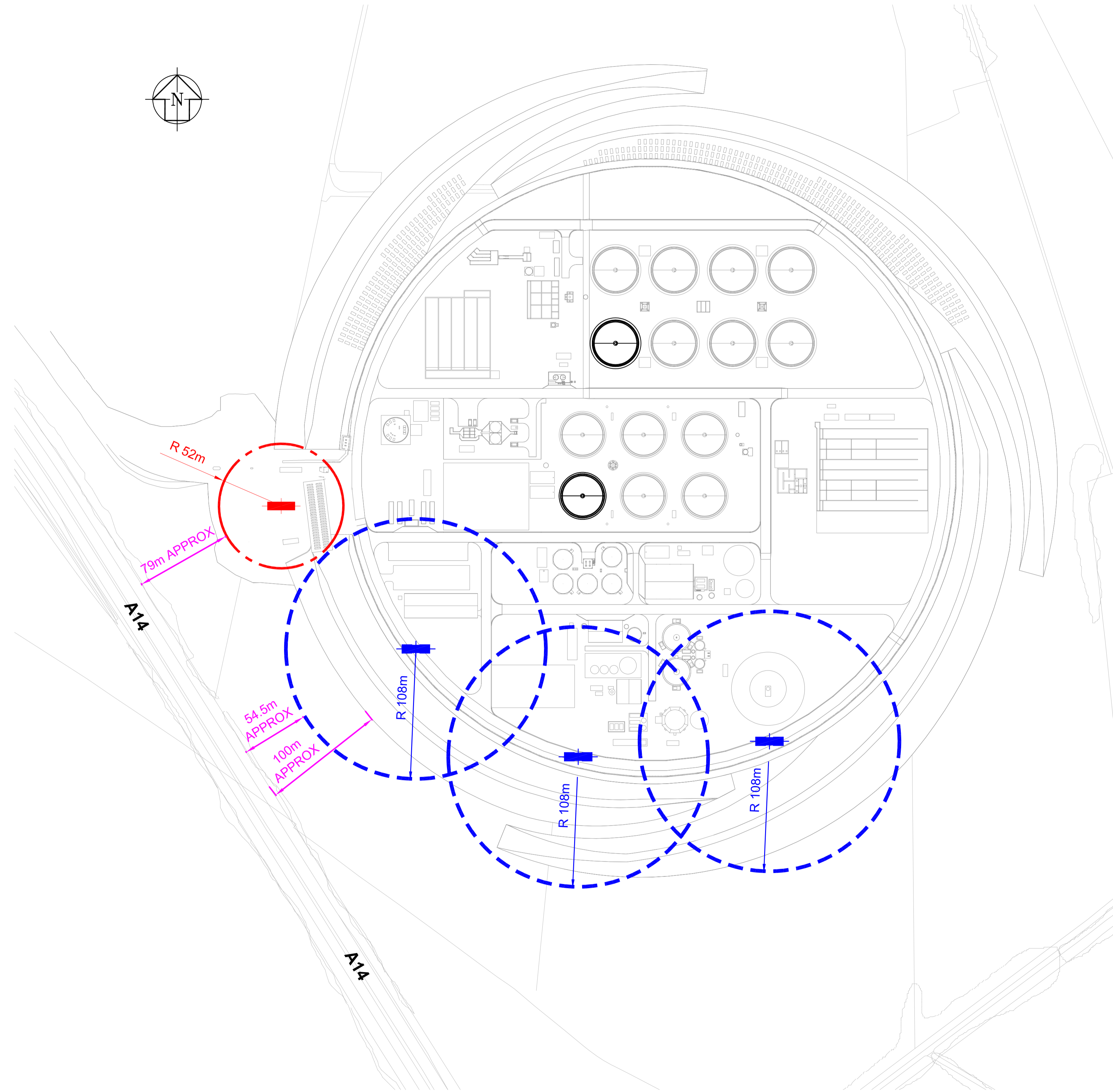
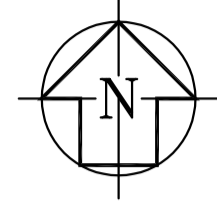
#### **Timing of delivery of revised documentation**

Because these changes necessitate the update of the traffic analysis which may results in consequent revisions to the application documentation, it will not be possible to re-submit at Deadline 4. The Applicant will submit the amended documents at Deadline 5.

## J) Exclusion Zone Figure

**GENERAL NOTES**

1. PROPOSED WASTE WATER TREATMENT PLANT DESIGN PLANS ARE INDICATIVE.



**KEY**

- 100T CRANE LIFT (RADIUS 52m)
- 300T CRAWLER CRANE LIFT (RADIUS 108m)

**POTENTIAL CRANE FALL / COLLAPSE ZONES**



DES'D: -	DATE: 22.01.24	SCALE: 1:2000 @A1	PROJECT TITLE	DRAWING TITLE	<p>The plan is produced by Anglian Water Services Limited, from Ordnance Survey Crown Copyright, Licence 100022432. This map is to be used for the purposes of viewing the location of Anglian Water plant only. Any other use of the map data or further copies are not permitted. This notice is not intended to exclude or restrict liability for death or personal injury resulting from negligence. The original document stored in the BIM 360 Doc Project carry the version, suitability code, revision and approval information. Prints are uncontrolled and shall not be used for construction.</p>	<p><b>A1</b></p>
DRAWN: DT	DATE: 22.01.24	<p><b>CAMBRIDGE WASTE WATER TREATMENT PLANT RELOCATION PROJECT</b></p>	<p><b>4.19 DESIGN PLANS POTENTIAL CRANE FALL / COLLAPSE ZONES</b></p>			
CHK'D: MH	DATE: 22.01.24					
APP'D: AH	DATE: 22.01.24					
REV	DATE	DETAILS	STAT	BY	CHK	APP

DES'D: -	DATE: 22.01.24
DRAWN: DT	DATE: 22.01.24
CHK'D: MH	DATE: 22.01.24
APP'D: AH	DATE: 22.01.24

PROJECT TITLE	DRAWING TITLE
<b>CAMBRIDGE WASTE WATER TREATMENT PLANT RELOCATION PROJECT</b>	<b>4.19 DESIGN PLANS POTENTIAL CRANE FALL / COLLAPSE ZONES</b>

<p><b>anglianwater</b></p> <p>Thorpe Wood House, Thorpe Wood, Peterborough, Cambridgeshire, PE3 6WT Tel: 01733 414100 Fax: 01733 414111</p>	<p>DRAWING No.</p> <p><b>00001-100006-CAMEST-ZZZ-LAY-Z-9825</b></p>
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<p>REV.</p> <p><b>C01</b></p>	<p>STAT.</p> <p><b>S4</b></p>
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## Get in touch

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

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