

## [Cambridge Waste Water Treatment Plant Relocation Project] – Written Summaries of Oral Representations Made by CCC at Issue Specific Hearing 3 [ISH3]

This document summarises the oral representations made by Cambridgeshire County Council (**CCC**) at the Issue Specific Hearing 3 (ISH3) on 10 and 11 January 2024 in relation to the application for development consent for Cambridge Wastewater Treatment Plant Relocation Project (the Scheme) by Anglian Water Services Limited (the Applicant).

This document does not purport to summarise the oral submissions of parties other than CCC and summaries of submissions made by other parties are only included where necessary in order to give context to CCC and submissions in response, or where CCC agreed with the submissions of another party and so made no further submissions themselves.

The document contains two separate tables – Table 1.1. for written responses to actions at ISH3 and Table 1.2. for Written Summaries of Oral Representations Made at ISH3. Each table is structured according to the order of items in the agenda for the Hearings published by the Examining Authority (ExA) on 10 and 11 January 2024.

**Table 1.1. Written responses to actions at CAH1 9<sup>th</sup> January 2024**

Agenda Item	Cambridgeshire County Council's Submission
<p><b>CAH1 A13 To provide views regarding use of s278 as an alternative to DCO provisions, whether matters should be left to a separate agreement, and whether potential delays associated with an unresolved s278 or contingency on an additional agreement could be mitigated.</b></p>	<p>The County is not satisfied with the terms of the Protective Provisions because in short they do not provide a suitable alternative to the familiar effective and robust process for highways works applied by the County through s 278 agreements under the Highways Act 1980.</p> <p>The County in accordance with approaches adopted elsewhere in respect of other DCO schemes namely Sunnica [ EN010106] and Medworth [EN010110] considers that a better approach can be achieved either through-</p>

	<p>a) a requirement in the DCO which confirms first that the undertaker must submit details of the proposed highways works and that the works cannot commence until an agreement (preferably a s278 agreement or other deed) addressing highways matter has been entered into and completed and which can be set out in a s106 agreement.</p> <p>b) a side agreement or deed with the undertaker (here Anglian) under the Local Government Act 1972 which replicates a s278 agreement.</p> <p>We recognise that it is possible to try to draft protective provisions which come closer to the s278 process but in our view the current protective provisions fall very far short of being as robust and as effective.</p> <p>The County can provide the Sunnica agreement and the draft DCO as well as the Medworth DCO and documents which show what the side agreement would entail.</p>
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**Table 1.2. Written responses to actions at ISH3 on 10<sup>th</sup> and 11<sup>th</sup> January 2024**

Agenda Item	The Councils' Submission
<b>3. Traffic and Transport</b>	
<b>ISH3 A29 To clarify Cambridgeshire County Council view as to whether a commitment to use low emission vehicles should be secured, and if so, how.</b>	Cambridgeshire County Council encourages the applicant or sub-contractors to use Euro VI standard diesel engines where possible. This can be included in the CTMP. It should be noted CCC would not be able to enforce this hence it is not a requirement.

<p><b>ISH3 A20 Confirm your view as to whether the CTMP is an acceptable way to secure the proposed Construction Forum / Liaison Group.</b></p>	<p>Yes, CCC considers this is an appropriate mechanism and has used CTMP to secure such forums in the past.</p>
<p><b>ISH3 18</b> <b>Confirm whether there are any currently-programmed significant roadworks for the A10 and the A14 (insofar as they form part of construction traffic routes) during the construction period for the proposed WWTP and Waterbeach pipeline.</b></p>	<p>As part of the mitigation works for Waterbeach, improvements are to be made to the A10 Landbeach Road junction and the A10 Butt Lane junction. The County Council estimates this is likely to commence late 2024/early 2025.</p> <p>Nation Highways will be able to inform the Examination of any A14 works planned.</p>
<p><b>ISH3 A11 (Action for Applicant, us and National Highways.)</b></p> <p>To provide a schedule which sets out in relation to each transport mitigation plan:</p> <ul style="list-style-type: none"> <li>• where the plan is secured in the draft DCO (e.g. the requirement number);</li> <li>• the name of the approving authority (the authority that will approve the mitigation plan or any submissions that are made in relation to it);</li> <li>• 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</li> <li>• Confirmation as to whether the approving authority and any consultee(s) are, as relevant, content with each mitigation plan and that it includes satisfactory: <ul style="list-style-type: none"> <li>o trigger points;</li> <li>o monitoring provisions; and</li> <li>o mitigation provisions.</li> </ul> </li> </ul>	<p>Cambridgeshire County Council as the relevant planning authority is to receive the associated management plans as they relate to Requirements in the draft DCO. As the Local Highway Authority Cambridgeshire County Council will review the following plans.</p> <ul style="list-style-type: none"> <li>Construction Traffic Management Plan</li> <li>Construction Worker Travel Plan</li> <li>Operational Worker Travel Plan</li> <li>Operational Logistics Plan</li> </ul> <p>Cambridgeshire County Council continues to engage with the Applicant to resolve the matters raised in submissions to the Examination as they relate to the respective management plans. This is to be documented in the Statement of Common Ground.</p>

<p>The ExA understands that at this point in time agreement may not have been reached with all parties in respect of all mitigation plans. At D4 please provide a schedule which sets out the current position and continue to endeavour to reach agreement during the course of the Examination. Please also indicate any matters in relation to which it has not been possible to reach agreement.</p>	
<p><b>ISH3 A30 Clarify the basis for the request for road damage payment(s) in association with the proposed WWTP given that the Applicant indicates that operational vehicle movements would not be significantly different from those associated with existing WWTP. Confirm whether the Applicant has been required to make such payment(s) to the local highways authority for traffic associated with the existing WWTP.</b></p>	<p>It is for construction traffic road damage payments are sought. Within Cambridgeshire the Highway Authority uses Section 59 of the Highways Act 1980 reactively i.e. if a developer damages the adopted public highway during the construction phase of any works due to excessive loading on the highway. S59 is not used protectively.</p> <p>Cambridgeshire County Council as Highway Authority requires within the Housing Estate Road Construction Specification (which is a County Council policy), that the design for a distributor road (which the B1049 is) be sufficient to accommodate within a 40 year life design traffic levels of traffic of 1.0msa (million standard axles). If the predicted traffic levels within the 40 year design life exceed 1 msa then a special design shall be submitted to the engineer (Appendix 1 HERCS).</p>
<p><b>ISH3 A8 Clarify the reason for Cambridgeshire County Council's LIR [REP1-133, table after paragraph 13.26] including references to operational accesses (OA refs) when the section appears to address construction traffic concerns.</b></p>	<p>The table on page 65 of the County Council LIR [REP1-133] was under the heading of construction impact. Reference to operational accesses were given in the same table where they were one in the same access, or the comment related equally to an operational access (often in close proximity). This explanation should have been part of the text in paragraph 13.26, with cross reference in the operational impact section.</p> <p>Cambridgeshire County Council and the Applicant had a meeting late December to discuss the accesses. An update to the table is provided at Appendix 1.</p>
<p><b>ISH3 A26 Response in relation to proposed mitigation for operational traffic at J34.</b></p>	<p>CoCC are satisfied with the proposals for operational traffic mitigations at J34. Note detail design will inform the final proposals.</p>

<p><b>ISH3 A27 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?</b></p>	<p>ANPR data can monitor vehicles passing through one or a series of points and thus track the route of the vehicle, although it cannot identify the vehicle type, make, or model. Where a breach of the routing plan is suspected, it would be for the applicant or contractor to review the available data (including entry and exit logs) and ascertain whether a breach had indeed occurred. Appropriate action would then be required by the applicant to reinforce the routing plan.</p>
<p><b>4 Ecology</b></p>	
<p><b>ISH3 A52 Provide further justification to demonstrate the County’s concerns regarding the potential for the Proposed Development to increase visitor pressure on Stow-cum-Quy Fen SSSI.</b></p>	<p>The County Council does not hold any data on the visitor usage of Stow-Cum-Quy Fen SSSI or any data to quantify the impact. However, Natural England have confirmed that the SSSI is already well used by visitors.</p> <p>It is the County Council’s position that facilitating new links / enhancement to the Public Rights of Way network will provide more opportunities for residents to access the area, and as such, likely to increase usage of the public rights of way networks and consequently, the Stow-Cum-Quy Fen SSSI located on the ‘honeyhill” circular route. This will be compounded by the creation of new residential developments in the local area, which will result in more usage of local amenities, including Public Rights of Way and greenspaces / nature reserves. This concern aligns with those set out in Natural England’s Relevant Representation [RR-015].</p> <p>The Applicant has not provided any baseline information to confirm the current level of recreational pressure on the SSSI or assess the likely impact as a result of the public rights of way improvements, associated with this scheme, and in combination with housing development in the local area. It is therefore not possible for the Council to quantify the anticipated increases in visitor usage on the SSSI.</p> <p>Given the lack of evidence, the County Council considered the most appropriate solution is to assume a ‘worse-case scenario’ and potential for the scheme to adversely impact of recreational pressure on the SSSI.</p>

The Applicant has proposed some mitigation for recreational pressure on the SSSI at page 203 of ES Chapter 8 [REP2-007], but this does not consider the improvement of public access to the Public Rights of Way network.

Page 203 of the ES Chapter 8 [REP2-007] also states that the LERMP will require “*user survey at least twice a year to understand how people are interacting with the recreational space and accessing the wider network of PRow and permissive paths*”. However, it is the Council’s position that user surveys on the water treatment site will provide no evidence to demonstrate whether or not there has been any impact on recreational pressure on the SSSI associated with the scheme and whether additional mitigation measures are required. The Council, as well as Natural England, seek that a programme to monitor the impact of recreational pressures on the SSSI during the operational phase. If adverse impacts are identified, remedial actions would need to be identified and implemented.

The Council accepts that there will also be potential for adverse impacts on the Stow-Cum-Quy Fen SSSI from forth-coming residential development in the local area. However, it is the water treatment plant proposal that will exacerbate this issue by improving Public Rights of Way links to the local settlements.

The Council welcomes the Applicant’s proposal to set up an “Recreational Pressure Advisory Group” with other developers, statutory agencies, local authorities and other interested parties to discuss and address this issue. The County Council has been invited to this meeting, to be held in late January.

It is important that the Applicant adequately engages with the “Recreational Pressure Advisory Group” and funding is secured to effectively monitor recreational pressure at Stow-cum-Quy Fen SSSI and be able to fund mitigation / remedial actions where adverse impacts are identified.

To address the County Council’s outstanding concerns, the Council County seek a S106 be drafted to require Anglian Water to actively engage and contribute to funding of the Advisory Group, provide a baseline recreational / visitor pressure survey for the SSSI,

	<p>contribute to implementing a recreational pressure monitoring programme and a package of mitigation / remedial actions (if required).</p>
<p><b>ISH3 A53 Check the LERMP [AS-066] and confirm whether you have any outstanding concerns regarding mitigation or monitoring of protected species.</b></p>	<p>The Council considers the outline Landscape, Ecological and Recreational Management Plan [AS-066] should provide a landscape and ecological masterplan for the entire scheme, with detailed design and management / monitoring secured through detailed LERMP (secured through requirement). This would help to ensure all ecological elements will be comprehensively incorporated into the entire scheme, rather than agreed across a variety of documents.</p> <p>Currently, ecology / landscape works associated with Work Areas 32 and 39 are to be dealt within requirement 11, however the outline Outfall Management and Monitoring Plan [REP2-027] does not include a Landscape and Ecological Management Plan. It provides some proposed habitat management / monitoring, but these are incomplete, as stated in our previous examination responses, including [REP3-057].</p> <p>The Code of Construction Practice Parts A / B does not detail how habitats will be reinstated (as discussed above) and managed, beyond any dead / dying hedgerows to be replaced after 5 years. This will not adequately secure reinstatement of all habitats to target condition. In addition, it is not clear how bat / badger / reptile / arable flora mitigation will be implemented for works outside the LERMP (e.g. monitoring bat boxes installations, reptile translocation habitat), given there appears to be no Landscape and Ecological Management Plan proposed.</p> <p>The Landscape, Ecological, Recreational Management Plan should be the delivery vehicle for implementation of protected species mitigation and/or licenses (bat, badgers / water vole) or reptile / arable flora mitigation strategy. The Council acknowledges that some elements will be dealt with by the Code of Construction Practice / Construction Environment Management Plan. However, this will not cover detailed management and monitoring, which should be secured through the LERMP.</p>
<p>Code of Construction Practice Parts A &amp; B – outstanding issues</p>	<p>Please find below the Council’s outstanding Issues within Code of Construction Practice Parts A &amp; B:</p> <ol style="list-style-type: none"> <li>1. Reptile Mitigation</li> </ol>



A brief outline of the Reptile Mitigation Strategy is provided at paragraphs 7.2.47-7.2.50 of Code of Construction Practice Part A [REP3-026]. However, this does not address previous concerns regarding double handling or reptiles within areas where translocated from other waterbeach developments have / will occur. This could cause unnecessary harm and suffering to individual animals and potentially impact their survival / local population.

The Council considers this could be resolved by updating paragraph 7.2.47 of Code of Construction Practice Part A [REP3-026], with reference to avoid double handling. As set out in County Council's response to ExAQ1 question 5.41 [REP1-134].

## 2. Reinstatement of temporary habitats / BNG element

The Council is concerned that no pre-commencement habitat\* surveys are proposed within the CoCP Part A [REP3-026]. These are essential to update the baseline information, inform proposed reinstatement habitat and provide information for delivery of BNG habitat.

During ISH3, the Applicant made reference to the General Mitigation Measures set out at paragraph 7.2.8 of CoCP Part A [REP3-026], which lists "*pre-commencement surveys... to confirm the presence or absence of protected species*" (para 7.2.8). Protected species surveys are completely separate to, and different, from pre-commencement habitat surveys.

Paragraph 7.2.69 of CoCP Part A [REP3-026] confirms "*habitats will be reinstated post works, and the target habitat type, distinctiveness and condition scores of the recreated habitats will match those of habitats currently present*". However, there is very limited information about how habitat will be reinstated. We would expect the applicant to produce detailed landscape specifications and a Habitat Management and Monitoring Plan / Landscape and Ecology Management Plan to demonstrate how the habitats will be managed and monitored to ensure target habitats are met and BNG is delivered for the 30 year period. This is particularly important for



	<p>habitats of biodiversity value (e.g. grassland, ditches, trees, hedgerows and arable field margins).</p> <p>Paragraph 7.2.68 of CoCP Part A <b>[REP3-026]</b> states that <i>“the measures set out under section 7.4 in respect of Soil Management and in the Outline Soil Management Plan (Appendix 6.3, App Doc Ref 5.4.6.3) will ensure the rapid and effective reestablishment of habitats especially hedgerows.”</i> The Council cannot find any reference to habitat reinstatement or hedgerows within these references. We seek clarification from the Applicant as to where this information is provided.</p> <p>3. Arable flora</p> <p>The Council welcome the inclusion of pre-commencement surveys for arable flora and proposed mitigation within CoCP Part A <b>[REP3-026]</b>. However, the Council is concerned the survey work will be confined to red-list / rare flora species previously recorded in Table 3.1 of the NVC Baseline technical appendix <b>[APP-095]</b>. Arable flora populations vary significantly between each year (depending on weather and land management regime). The Council seek that a more comprehensive arable flora survey is completed, to pick up other notable arable flora that are present immediately prior to construction.</p> <p>4. Veteran Trees</p> <p>The Arboricultural Impact Assessment which set out the tree protection measures, has been split across two documents:</p> <p><b>[APP-102]</b> - 5.4.8.17 Waste Water Treatment Plant Arboricultural Impact Assessment (AIA)</p> <p><b>[REP1-035]</b> / <b>[REP1-036]</b> 5.4.8.19 Waterbeach Pipeline Arboricultural Impact Assessment (AIA), including includes protection measures for veteran trees.</p>
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	<p>The Council is concerned that neither the Code of Construction Practice Parts A or B refer to the Waterbeach Pipeline AIA and consequently, the veteran trees will not be protected.</p> <p>This matter can be resolved through the update to paragraph 7.2.9 of CoCP Part A [REP3-026] to include reference to veteran trees and Waterbeach Pipeline AIA [REP1-035]. The Council welcomes commitment by the Applicant to update this document.</p> <p>In addition, the Council seeks section 3.4 of CoCP Part B [REP3-028] be updated to refer to the Waterbeach Pipeline AIA [REP1-035], instead of the Waste Water Treatment Plant AIA.</p>
<p><b>ISH3 A54 to Applicant and CCoC - 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.</b></p>	<p>Cambridgeshire County Council is liaising with the Applicant and further updates will be provided to the Inspectorate.</p>
<p><b>ISH3 A56 Provide wording for the CoCP Part A [REP3-026] to better reflect strategies for mitigating potential invasive non-native species effects.</b></p>	<p>Please refer to GCSP / SCDC Deadline 4 submissions</p>
<p><b>ISH3 A64 to Applicant and CCoC - 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.</b></p>	<p>The Council are awaiting Anglian Water to set up a meeting to discuss and resolve outstanding matters.</p>
<p><b>5 Water Resources</b></p>	
<p><b>ISH3 A76 Clarify whether achieving BREEAM 'excellent' standard would also achieve the maximum number of credits for water efficiency for category Wat 01, or whether this</b></p>	<p>As the LLFA we do not assess against BREEAM standards and water efficiency for buildings.</p>

<p>would need to be secured over and above requiring BREEAM 'excellent'</p>	
<p><b>ISH3 A80 Provide details of any additional sentences / principles you wish to be included within the outline Drainage Strategy, and liaise with the Applicant in this regard.</b></p>	<p>Cambridgeshire County Council is liaising with the Applicant on this matter. A summary of the council's view is below.</p> <ul style="list-style-type: none"> <li>- There are two methods for calculating runoff rates used in the drainage strategy which would generate different runoff rates from the site. To ensure that consistency and clarity is continued to the detailed design stage, only one model should be included in the drainage strategy. Model 1 in the Outline Drainage Strategy is the preferred option from the LLFA's perspective as this relates directly to the impermeable areas draining from the site. Model 2 may overestimate the rates, potentially increasing the overall runoff from the site.</li> <li>- With regards to surface water management on site, the LLFA looks for SuDS to be utilised as widely as possible to treat and manage runoff. There is discussion of using interceptors to boost treatment, which the LLFA views as unsustainable and should only be considered as a last resort in the event all other SuDS are not viable. The other option is to discharge runoff back to the head of the system for treatment in the new plant, which the LLFA would view as discharging runoff to the foul sewer, which is not supported by the principles set out in the drainage hierarchy (albeit understandable for surfaces with exceptionally high foul pollution loads). We are at a point in the design stage where these principles can be set out to ensure that surface water runoff is being managed and treated sustainably from and therefore options to utilise more SuDS for runoff across the site should be investigated and discussed in the Outline Drainage Strategy.</li> </ul>
<p><b>ISH3 A79 To all LAs - Confirm if you consider the outline water quality monitoring plan to be acceptable?</b></p>	<p>Cambridgeshire County Council considers the Outline Water Quality Monitoring Plan acceptable.</p> <p>Noting discussions at ISH3 regarding private drinking sources and in the event of, or risk of contamination, the Applicant proposes to inform relevant parties. This should include the relevant health authorities.</p>

**Table 1.3. Written Summaries of Oral Representations Made at ISH3 on 10<sup>th</sup> and 11<sup>th</sup> January 2024**

Note responses to the actions above include a number of matters the County Council provided oral representation to at ISH3 that are not repeated below. The responses to the ISH3 actions should be read in conjunction with additional information provided below.

Agenda Item	Cambridgeshire County Council's Submission
<b>4 Carbon</b>	The Council's Carbon and Energy Manager (Mrs Sarah Wilkinson, MSc MIEMA CEnv) spoke on this topic.
Carbon assessment, including: o Baseline of the carbon assessment.	<p>The County Council's view is that the baseline for construction ought properly to be zero, since without the development, no construction would take place. Therefore, the net change in emissions from the construction phase as a result of the development is an increase of around 50,000 tonnes CO<sub>2</sub>e. (according to applicant's estimate of construction phase emissions).</p> <p>Choice of baseline affects claims of net total carbon impact of project both operationally and whole life.</p> <p>The applicant's response to the ExA Qs (in REP1-079) is a slight misquote of the IEMA guidance. The IEMA guidance (p17) also explicitly states that a baseline is a reference point... "sometimes referred to as business as usual (BaU)". The IEMA guidance, after giving the two options of the form that a baseline can take, also goes on to say that "The ultimate goal of establishing a baseline is being able to assess and report the net GHG impact of the proposed project." The 'net impact of the proposed project' can only be assessed by comparing it to the current 'without development' scenario.</p> <p>For operational emissions, the Applicant has not presented any baseline, but the Council's view is that the most suitable baseline would be the current operational emissions of the existing Cambridge WWT plant, given that the proposal is for a relocation, such that the new plant is a direct replacement for the existing one, albeit at a different location.</p>
Uncertainty of future emissions and scenarios.	<p>it is uncertain to what extent the export of biomethane will be displacing other sources of gas (fossil fuels), rather than contributing to an overall increase in gas use.</p> <p>It is also uncertain whether the export to the gas grid will be required for the entire lifetime of the plant, considering the trend to electrification of heating.</p>

	<p>The carbon benefit of avoided emissions will reduce as the gas grid becomes greener (biogas) but there is no forecast for timing or extent of this</p>
<b>5. Ecology</b>	<p>The Council's Ecology Officer (Mrs. Deborah Ahmad) spoke on this topic.</p>
Biodiversity Net Gain Report	<p>BNG for the entire scheme will be addressed through requirement 25 of the draft DCO <b>[REP3-003]</b>. However, the Council is unclear exactly how habitat creation / management / monitoring will be delivered through the updated BNG report.</p> <p>The BNG Report <a href="#">[REP2-020]</a> submitted as part of the examination relies on the production of the following documents to secure habitat management / monitoring within other documents:</p> <ul style="list-style-type: none"> <li>- LERMP</li> <li>- Outfall Operational Management &amp; Monitoring Plan (based on the Outline Outfall Management and Monitoring Plan <a href="#">[REP2-027]</a>)</li> <li>- CoCP Parts A/B</li> </ul> <p>The Council welcomes confirmation from the Applicant that the BNG report will incorporate a Habitat Management and Monitoring Plan for the entire site. If this is the case, it will be important that it covers all habitats to be retained, reinstated, enhanced and created as part of the entire scheme.</p> <p>The Council request further details to demonstrate how the BNG report (to be submitted to discharge requirement 25) will detail 20% BNG will be delivered for the relevant phasing of the scheme. The relationship between this document and the habitat management or monitoring set out in the LERMP / OOMMP should be made clear.</p>
Delivery of Biodiversity Net Gain	<p>The Applicant has not confirmed where the off-site river Biodiversity Net Gain habitat / credits will be secured. The Council is still concerns this may not be delivered.</p> <p>Requirement 25 would also need the County Council as the relevant authority to monitoring the delivery of BNG. The County Council seeks that BNG reports are submitted to the County Council in years 1, 2, 3, 4, 5, 10 and every 5 years (for a minimum of 30 years) and that adequate funding is provided to allow the Council to review these documents and secure remedial action (if/when required).</p>

	<p>To address these outstanding issues, the County Council seeks a S106 agreement with the applicant to</p> <p>(a) confirm that off-site BNG will be secured through a legal agreement to be submitted to the LPA and</p> <p>(b) LPA's monitoring of on-site BNG and off-site BNG (on the applicant's land) for a minimum of 30 years.</p>
<p>LERMP - Advisory Group</p>	<p>The Council seeks S106 funding to secure stakeholder engagement to secure the effective delivery of the Landscape, Ecological and Recreational Management Plan [<b>AS-066</b>] to ensure ecological mitigation and enhancement will be delivered.</p> <p>As set out in the LERMP, the advisory group will (although terms and conditions are to be provided within the detailed LERMP):</p> <ul style="list-style-type: none"> <li>- advising on detailed management and maintenance plan (paragraph 4.1.2)</li> <li>- discussing and managing matters such as recreational use (paragraph 4.3.18)</li> <li>- 5-yearly review of the LERMP (Paragraph 5.1.5)</li> </ul> <p>It is noted that the LERMP states that this advisory group will merge with the Operational Management Group after completion of landscape works (para 4.1.2), although it is unclear what this means.</p>

## Appendix 1

Pp 65 of Cambridgeshire County Council's Local Impact Report – updates are provided in red text below. This relates to Action 8.

**ISH3 A8 Clarify the reason for Cambridgeshire County Council's LIR [REP1-133, table after paragraph 13.26] including references to operational accesses (OA refs) when the section appears to address construction traffic concerns.**

### Access Points for construction traffic:

13.25 The Highway Authority would seek that all works locations have estimated levels of HGV and heavy plant movements listed within Appendix A of the Construction Traffic Management Plan, the numbers should show the total number likely to use the junction and the maximum likely daily flows.

13.26 Further specific mitigation measures proposed are in the table below.

Site Reference	LIR Comments
COA1 - off Cowley Road into the existing Cambridge Waste Water Treatment Plant	The Highway Authority would seek that all movements of construction plant with a gross weight in excess of 3.5 tonnes be limited to the hours of 09.30-15.30hrs Monday to Friday to avoid conflict with the peak hour movements into and out of Cambridge. Access to the Cowley Road site crosses two cycle routes which are heavily used as commuter routes. <b>Agreed by applicant</b>
CA1 - off Fen Road Work OA1 - off the private track leading to the substation off Fen Road	The only vehicular access to Fen Road is through the City of Cambridge, therefore, The Highway Authority would seek that all movements of construction plant with a gross weight in excess of 3.5 tonnes be limited to the hours of 09.30-15.30hrs Monday to Friday to avoid conflict with the peak hour movements. <b>Agreed by applicant</b>



	<p>This route also has to cross a level crossing. The impact on the ability of construction traffic to access the proposed sites and the impact on the local residents must be also be taken into consideration.</p>
<p>CA2 - west off Horningsea Road, south of the A14 Work  CA3 - east off Horningsea Road, south of the A14  OA2 - east off Horningsea Road, south of the A14  COA2 - west off Horningsea Road to fields north  CA8 - west off Horningsea Road, north of the A14  CA9 - east off Horningsea Road, south of the A14  CA7 - between two fields south-west of Biggin Hall  COA6 - east off Horningsea Road  CA16 - south-east from the layby on Clayhithe Road  COA9 - off Clayhithe Road leading into the private track at Grange Farm  CA20 - off Clayhithe Road into Hatridge's Lane leading towards Riverside Farm</p>	<p>In principle these sites are acceptable to the Highway Authority with the caveat of note 1 above and that suitable routing agreements are in place. <b>The proposed methodology brought forward re the routing agreement is acceptable to the Local Highway Authority recognising the difficulties that enforcement may engender.</b></p>
<p>CA4 - off A14 mainline westbound carriageway to land between the A14 mainline and A14 Westbound On-Slip Road  CA5 - off A14 mainline westbound carriageway to land between the A14 mainline and A14 Eastbound Off-Slip Road</p>	<p>All these locations seem to be in land under the control of National Highways as the National Highway Authority.</p>

<p>CA6 - off A14 Eastbound Off Slip Road to land between the A14 mainline and A14 Eastbound Off-Slip Road immediately south of the Off-Slip Road</p>	
<p>CA10 - south off Low Fen Drove Way, south of Low Fen Drove Way COA3 - north off Low Fen Drove Way COA4 - south off Low Fen Drove Way CA11 – east off Low Fen Drove Way CA12 - private track leading east off Low Fen Drove Way</p>	<p>Low Fen Drove Way is not a melted highway and as works will be needed to ensure that it is capable if carrying the required construction traffic. Procedures of continuing NMU access through out the construction period must also be provided. <b>Details from the Applicant are sought to assure access is maintained.</b></p>
<p>CA13 - private track leading south-west off Station Road (private road) COA7 - north and south off the private track south-east of Gayton Farm OA3 - off the private track south-east of Gayton Farm CA14 - off the private track east of Gayton Farm CA15 - off the private track north-east of Gayton Farm CA18 - off the private track leading east through Grange Farm OA6 - off the private track leading south around the boundary of Grange Farm COA8 - west and east off the private track east of Grange Farm COA10 - between two fields north-east of Grange Farm</p>	<p>While these work locations are listed as being off 'private' roads details of how these roads interact with the adopted public highway should be provided. <b>Further information from the Applicant is awaited.</b></p>

<p>CA21 - off south side of access into Riverside Farm to the field south of Hatridge's Lane</p> <p>CA23 - north off track leading west from Hatridge's Lane to the west of Riverside Farm</p> <p>CA22 - east off Hatridge's Lane onto track through Riverside Farm</p> <p>OA7 - off the adopted public highway section of Hatridge's Lane north along the private section of Hatridge's Lane</p> <p>COA11 Vehicular access to the west and east off Hatridge's Lane north of Riverside Farm</p>	
<p>CA17 - between two fields north of footpath 130/8 and east of footpath 130/10</p> <p>CA24 - west and east off the track that forms footpath 247/10</p>	
<p>CA25 - east off Burgess's Drove</p> <p>COA13 - east off Burgess's Drove</p> <p>CA26 - west off Burgess's Drove</p> <p>CA27 - west off Burgess's Drove</p> <p>COA12 - south off Burgess's Drove</p>	<p>The Highway Authority would seek that all movements of construction plant with a gross weight in excess of 3.5 tonnes be limited to the hours of 09.30-15.00hrs during the term time of the Waterbeach Community Primary School as Bannold Road, the only access to Burgess' Drove is used by significant numbers of carers and children to access the school. <b>Agreed by the applicant</b></p>
<p>COA14 - north off Bannold Road</p> <p>COA15 - north and south between two fields east of Work No. 30, 33, 34 and 37 28</p> <p>COA16 - east off Bannold Drove</p> <p>COA17 - east off Bannold Drove</p> <p>COA18 - west off Bannold Drove</p>	<p>The Highway Authority would seek that all movements of construction plant with a gross weight in excess of 3.5 tonnes be limited to the hours of 09.30-15.00hrs during the term time of the Waterbeach Community Primary School as Bannold Road, used by significant numbers of carers and children to access the school. <b>Agreed by the applicant</b></p>