

Response to ExA's Second Written Questions (ExQ2)

This document sets out the response to the Examining Authority (ExA)'s Second Written Questions and requests for information (ExQ2) by Cambridgeshire County Council (CCoC). The table below sets out the topic, question number and CCC response.

Question Number	Question for	Question	Cambridgeshire County Council (CCoC)
General & Cross Topic Questions			
1.1	Applicant, Cambridgeshire County Council (CCoC)	Legal agreement The draft section 106 (Parking) was updated at D3 [REP3-044] to include a Schedule 2 relating to equestrian signage. Please clarify the necessity for this and why this schedule is not referred to in the main body of the legal agreement.	CCoC considers that the measures included in Schedule 2 of the draft agreement are necessary because the Applicant's proposed opening of a new public bridleway between Low Fen Drove Way and Station Road, Stow cum Quy, will create a new through-route for equestrian (and cycle) traffic that has not heretofore existed. CCoC as a result of this new route considers it appropriate to improve directional signage (and other related facilities which may include crossing points or surfaced areas) for these classes of user on the adjacent and surrounding bridleway and non-motorised user networks. As the Local Highway Authority, CCoC is best placed to deliver these improvements, which although related to the proposed development would largely be outside the DCO boundary. These measures will promote use of the expanded network for recreational users, thereby helping to realise the benefits of delivering the new bridleway. Discussions with the Applicant for a draft equestrian S106 are continuing, with the principle of a contribution agreed.
1.2	All interested Parties	Policy The National Planning Policy Framework was revised on 19 December 2023. Do you consider this to have any	CCoC does not consider that there are any changes to the National Planning Policy Framework that would affect the application, save for noting that Paragraph numbering above paragraph 62 has changed.

		implications for the application?	
Principle (including policy and legislative context, needs and alternatives)			
2.1	Applicant, CCoC	<p>Policy CCoC's LIR [REP1-133], including para 3.10, identifies Policy 11 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021 (MWLP) as a key policy consideration. However, the Applicant does not appear to address this policy in any particular detail in its Planning Statement and CCoC does not appear to conclude on compliance with any MWLP policies, including Policy 11, in its LIR.</p> <p>To the Applicant: a) Please address this policy in detail, including the extent to which it lends support to the Proposed Development, including in respect of the general principle of development. To CCoC: b) Please clarify whether in your view, the Proposed Development would be compliant with all aspects of this policy.</p>	<p>As has been referred to a number of times and set out for example at paragraph 2.9 of the CCoC's LIR, if this proposal were not the subject of a direction under s35 of the Planning Act 2008 making it a project of national significance for which development consent is required under the 2008 Act, it would be a waste development proposal that would need to be subject to a planning application under the Town and Country Planning Act 1990 with CCoC as the determining authority in its role as Minerals and Waste Planning Authority. It would then be for CCoC to determine such an application with regard to the Cambridgeshire and Peterborough Minerals and Waste Local Plan (MWLP) 2021 as well as any relevant Local Plan policies.</p> <p>The approach that CCoC would take towards assessing such a scheme against POLICY 11: WATER RECYCLING AREAS (WRAS), which states that Water Recycling Centres (WRCs) would require a number of matters to be addressed within and as part of the application, is outlined below.</p> <p>First it would be recognised that Water Recycling Centres (WRCs) are essential infrastructure as set out in the policy. In addition, in summary form, the policy provides as a starting point that proposals for new water recycling capacity or proposals which are required for operational efficiency, whether on WRAs or elsewhere (with such proposals including the relocation of WRCs, provision of supporting infrastructure), will be supported in principle. This particularly so where it is shown that the proposal is required to meet wider growth proposals identified in the Development Plan, subject to four criteria. On the face of it therefore a scheme such as this would be supported in principle.</p> <p>In relation to the criteria that would need to be met the policy makes it clear that: "Proposals for such development must demonstrate that:</p>

			<p>(a) there is a suitable water course to accept discharged treated water and there would be no unacceptable increase in the risk of flooding to others”.</p> <p>CCoC has had regard to 5.4.20.11 ES Chapter 20 Appendix 20.11 Milton Water Recycling Centre Discharge Consent Water Quality [AS-170]. This is the sort of evidence that CCoC would expect to be submitted and thereafter CCoC would consult with the Environment Agency (EA) to confirm whether this criterion has been met. CCoC has seen the Additional Submission made by the EA dated 5 January 2024 [AS-175] which raises concerns about the Flood Risk Assessment. To that end currently it would appear that Policy 11 (a) is not complied with. This is however a matter ultimately for the ExA and CCoC has not conducted any consultation directly with the EA.</p> <p>“(b) if an extension to an existing site is less than 400 metres from existing buildings normally occupied by people, an odour assessment demonstrating that the proposal is acceptable will be required, together with appropriate mitigation measures;”</p> <p>CCoC has had regard to 5.2.18 ES Volume 2 Chapter 18 Odour [APP-050], ES Volume 4 Chapter 18 Appendix 18.1 Odour Assessment Methods and Effects Summary [APP-137], 5.4.18.2 ES Chapter 18 Appendix 18.2 Odour Impact Assessment [AS-104], 5.4.18.2 ES Chapter 18 Appendix 18.2 Odour Impact Assessment (tracked) [AS-105], 5.4.18.4 ES Chapter 18 Appendix 18.4 Preliminary Odour Management Plan [AS-106], 5.4.18.4 ES Chapter 18 Appendix 18.4 Preliminary Odour Management Plan (tracked) [AS-107] set out the Applicant’s odour assessment and management plan.</p> <p>CCoC itself does not have all the expertise to comment on whether the odour assessment demonstrates that the proposal is acceptable. This would in the context of a 1990 Act be a matter for consultation with and advice from South Cambridge District Council’s (SCDC) Environmental Health team as well as our Public Health officers.</p>
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Biodiversity			
5.1	NE, CCoC	<p>Monitoring and mitigation</p> <p>Are you satisfied that the application documents, (including the Construction Environmental Management Plan (CEMP) [AS-057], Commitments Register [REP1-057], Lighting Design Strategy [REP4-048] and Outline Water Quality Monitoring Plan [REP2-028]) would secure adequate ecological mitigation measures? If not, please explain the reasons</p>	<p>The Council welcomes the updated to the documentations at deadline 4 address a number of the Council's concerns.</p> <p>However, the Council is still concerned that adequate mitigation has will not be secured for the following:</p> <ol style="list-style-type: none"> 1. Low Fen Drove Grasslands and Hedges County Wildlife Site <p>Please refer to Council's answer to question 5.17 (below), seeking update to the Lighting Design Strategy [REP4-048].</p> <ol style="list-style-type: none"> 2. Arable flora & Reinstatement of habitats / BNG <p>Please refer to Council's answer to question (below) 5.23, seeking update to the Code of Construction Practices Parts A / B.</p>

		<p>for this and any changes you would wish to see.</p>	<p>3. Bats</p> <p>Secondary mitigation for operational lighting impact to bats on page 217 of the Biodiversity Chapter [REP4-025] states that “<i>Detailed lighting design will comply with the Lighting Design Strategy (Appendix 2.5 App Doc Ref 5.4.2.5). This includes the requirement for lighting to accord with The Institute of Lighting Professionals Advice Note - Guidance Note 1 for the Reduction of Obtrusive Light (GN01/21) (2021) or any later revisions of this document published by the Institute and Guidance Note 08/23 - Bats and Artificial Lighting</i>”.</p> <p>The Council notes that a summary of Guidance Note 08/23 Bats and Artificial Lighting in the UK, Bats and the UK (ILP and Bat Conservation Trust, 20182023) has been provided at paragraph 2.4.10 of the Lighting Design Strategy. However, the Council cannot find anywhere in the Lighting Design Strategy that states the lighting scheme <u>will accord</u> with this guidance note.</p> <p>The Council recommends this is confirmed within Lighting Design Objective 6 on page 17 of the Lighting Design Strategy [REP4-048].</p> <p>4. Species mitigation</p> <p>The Council seeks further discussions with the Applicant to address matters set out within section A53 of the Councils Actions and Oral Summary for ISH3 [AS-179]. Particularly:</p> <ul style="list-style-type: none"> - Species mitigation should be fully incorporated into the Landscape, Ecological and Recreational Management Plan [REP4-056] - Further details how protected species mitigation that falls outside the LERMP [REP4-056] will be addressed, particularly compensatory bat boxes / badger habitat. Which isn't addressed /
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			goes beyond the remit of the Code of Construction Practice Parts A and B
5.6	CCoC	<p>Recreational impacts on Stow-cum-Quy Fen SSSI</p> <p>Comments contained within your summary of oral representations from ISH3 [AS-179] regarding potential recreational pressure on the SSSI are noted. Do you consider that any increase in visitor pressure on the SSSI would be harmful, or do you consider that it could be that some increased visitor pressure would be acceptable, noting the lack of data to currently quantify the existing level of recreational pressure?</p>	<p>From discussions with Natural England, it is apparent that SSSI is already well used by the public, and exhibits visitor pressure. Therefore, the Council considers that any increase in visitor pressure, particularly in combination with new housing development(s), is likely to result in harm to the SSSI. However, the level of adverse impact is unclear, given the lack of baseline survey information.</p>
5.7	CCoC	<p>Recreational impacts on Stow-cum-Quy Fen SSSI</p> <p>The updated Principal Areas of Disagreement [REP4-076] submitted by the Applicant suggests that NE is content that visitor pressure on the SSSI can be monitored and managed through the use of an Advisory Group. If NE confirms this position, would</p>	<p>Yes, we would support the establishment of an Advisory Group to address issues regarding visitor pressure on the SSSI to monitor and management. There must be a commitment to undertake a baseline recreational visitor pressure survey (undertaken by a specialist ecologist) and ongoing monitoring, upon which the Advisory Group can make decisions.</p> <p>The Advisory Group will need to incorporate a wide range of stakeholders covering ecology and access to greenspace, including County Council, Natural England, Wildlife Trust and developers.</p> <p>It will be important that the Advisory Group is adequately funded.</p>

		you also be content to manage visitor pressure in this way?	
5.15	CCoC, SCDC	<p>Securing BNG</p> <p>Do you consider that the dDCO and supporting documents adequately secure 20% BNG for all unit types?</p>	<p>The scheme adequately secures on-site 20% BNG for area-based and linear (hedgerow) habitats, which will be delivered under requirement 25.</p> <p>The scheme does not currently deliver 20% BNG for watercourses. There is a commitment from the applicant to address this issue through Requirement 25(1)(b). However, as confirmed within the responses to ExA Hearing Actions [REP4-087] – hearing point 62, the Applicant has not identified the off-site BNG / BNG credits (to date). Therefore, the Council seeks further commitments to be secured through S106 agreement to address this point. As set out in the Council’s Written Summaries of Oral Representations Made by CCC at Issue Specific Hearing 3 [ISH3] [AS-179] (pages 13/14).</p>
5.16	EA, NE, CCoC, SCDC,	<p>Reedbed</p> <p>Please confirm whether you still consider the introduction of a reedbed system at the proposed outfall necessary (noting that it is the Applicant’s stance that it would not be feasible owing to permanent changes to the existing public right of way and existing ditch, and that the sizing of a reedbed to offer meaningful energy dissipation and water treatment function for the size of the catchment area would be in the order of 90 hectares [REP1-078]).</p>	<p>The Council defers to Environment Agency and Natural England.</p>

5.17	CCoC	<p>Impacts on Low Fen Drove Way Grasslands and Hedges County Wildlife Site (CWS) and River Cam CWS</p> <p>Please confirm if the amendments made to the Lighting Design Strategy [REP4-048] and to ES Chapter 8: Biodiversity [REP4-024] satisfy your concerns regarding the impacts from lighting on Low Fen Drove Way Grasslands and Hedges CWS and River Cam CWS? If not, please set out clearly why and how this could be resolved.</p>	<p>The Council is satisfied that the updated documents will adequately mitigate the River Cam from impacts of lighting – matter resolved.</p> <p>However, the Council’s concerns regarding the following County Wildlife Site have not been resolved:</p> <p><u>Low Fen Drove Grassland and Hedges County Wildlife Site</u></p> <p>The Council is concerned that mitigation for lighting impacts on Low Fen Drove Grassland and Hedges County Wildlife Site will not be effective given there is inconsistencies between the mitigation proposed within the Chapter 8, measures set out at Applicant’s Response to ExA Hearing Actions [REP4-087] hearing action point 67 and those written within the Lighting Design Strategy:</p> <ol style="list-style-type: none"> 1. ES Chapter 8 - Biodiversity [REP4-025] <p>Secondary mitigation for operational lighting impact to Low Fen Drove Way Grassland and Hedges County Wildlife Site on page 216 (respectively) of the Biodiversity Chapter [REP4-025] states that “<i>Detailed lighting design will comply with the Lighting Design Strategy (Appendix 2.5 App Doc Ref 5.4.2.5). This includes the requirement for lighting to accord with The Institute of Lighting Professionals Advice Note - Guidance Note 1 for the Reduction of Obtrusive Light (GN01/21) (2021) or any later revisions of this document published by the Institute and Guidance Note 08/23 - Bats and Artificial Lighting</i>”.</p> <p>The Council notes that a summary of Guidance Note 08/23 Bats and Artificial Lighting in the UK, Bats and the UK (ILP and Bat Conservation Trust, 2018/2023) has been provided at paragraph 2.4.10 of the Lighting Design Strategy. However, the Council cannot find anywhere in the Lighting Design Strategy that states the lighting scheme <u>will accord</u> with this guidance note.</p>
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5.18	CCoC	<p>Impacts on Low Fen Drove Way Grasslands and Hedges CWS</p> <p>The Applicant responded to your concerns regarding the presence of calcareous grassland within the CWS under [REP3-054] at paras 2.1.1 – 2.1.7. Please confirm whether this has addressed your concerns on this matter? If not, please set out clearly why and how this could be resolved.</p>	<p>The Council welcomes the Applicant’s response – matter resolved.</p>

5.19	CCoC	<p>River Cam CWS Please confirm if the amendment made to R7 of the dDCO, which now expressly refers to hard and soft landscaping and ecological habitat creation, satisfies your concerns regarding securing the detailed design within Works Nos. 32 and 39 (please also see the Applicant's response to ISH3 action point 64 for further information [REP4-087])? If not, please set out clearly why and how this could be resolved.</p>	<p>The Council welcomes the Applicant's response to ISH3 [REP4-087] and update to the Outline Outfall Management Plan [REP4-060] / [REP4-061].</p> <p>However, the Council's concerns relating to the omission of 'other neutral grassland' from the Outline Outfall Management Plan, as set out in detail within the County Council's Comments on the Deadline 2 Submissions [REP3-057] has not been addressed.</p> <p>It appears the Applicant is suggesting it be covered under 'habitat reinstatement' under the Code of Construction Practice Part A/B, which is considered inappropriate, given it is habitat creation rather than reinstatement. The 'other neutral grassland' will be created on land currently 'ruderal/ephemeral' as shown on shown as ruderal/ephemeral on Sheet 2 of 7, Figure A.1, BNG Assessment [REP4-054]. Therefore details of habitat creation and confirmation they will be managed and monitored as part of the OOMP.</p> <p>Therefore, the Council seeks the creation, management and monitoring of these areas of other neutral grassland be included within the OOMP.</p>
5.20	CCoC	<p>River Cam CWS Has the updated outline outfall management and monitoring plan [REP4-060] addressed your concerns regarding mitigation and compensation for impacts to the River Cam? If not, please set out clearly why and how this could be resolved.</p>	<p>Yes, the Council's previous concerns have been adequately addressed – matter resolved.</p>
5.23	CCoC	<p>Code of Construction Practice (CoCP) Parts A and B</p>	<p>The Council's concerns regarding veteran trees and reptile mitigation strategy have been adequately addressed.</p>

		Do the updates to the CoCP Parts A and B [REP4-040 and REP4-042] resolve the concerns identified on pages 8 to 10 of your written summary of oral submissions from ISH3 [AS-179] regarding these documents?	However, the updated CoCP Parts A and B do not address the following concerns detailed within the Council's Written Summaries of Oral Representations Made by CCC at Issue Specific Hearing 3 [ISH3] [AS-179] (pages 8 & 9): <ul style="list-style-type: none"> - Reinstatement of habitats / BNG - Arable flora The Council seek an update of the CoCP Parts A / B to fully address these points.
5.24	Applicant, CCoC, SCDC	Invasive non-native species Please provide an update on how all parties are addressing matters regarding invasive non-native species.	The Council defers to SCDC.
5.27	CCoC	Important hedgerows Do you have any outstanding concerns regarding the impact of the Proposed Development on important hedgerows?	The Council considers this matter resolved. The applicant has updated the Hedgerow Regulations & Tree Preservation Plans [REP4-021] to reflect the decision to retain important hedge H23-H24, as stated at ISH3.
5.28	Applicant, CCoC, SCDC	Bats Please review and provide a comprehensive response to comments from Chris Smith [REP4-098].	The Council will await the response from Anglian Water before making comment on the concerns raised by Chris Smith
Carbon emissions and climate change mitigation and adaptation			
6.4	CCoC, SCDC, CCC	D4 updates Do you consider that the updates to ES Chapter 10 [REP4-026], the outline Carbon Management Plan (oCMP) [REP4-064] and provision of the Design Code	Yes, the Council considers that the Applicant's updates to ES Chapter 10 [REP4-026], the outline Carbon Management Plan (oCMP) [REP4-064] and provision of the Design Code [REP4-085], along with the updated GHG Calculations [REP4-062], do adequately assess the impacts from carbon emissions and sufficiently capture the proposed mitigation measures, including monitoring and reporting.

		<p>[REP4-085] adequately assess the impacts from carbon emissions and sufficiently capture the proposed mitigation measures, including monitoring and reporting? Please set out clearly any outstanding concerns or comments regarding the aforementioned documents, with justification for this and suggested solutions.</p>	<p>However, outstanding concerns remaining are: Net operational emissions would increase if the CHP option was chosen (noting that this is not the Applicant's preferred option). The Applicant relies on securing offsets to reach carbon neutrality (mainly relevant if the CHP option was selected) but it is currently very difficult to identify and obtain credible, verified offsets and it is uncertain whether a solution will be found to this challenge of securing credible long-term offsets (or whether the Regulator would approve expenditure on the cost of offsets). Construction phase emissions are still very high, estimated by the Applicant at 53,000 tCO₂e. The Applicant's preferred option relies very heavily (in terms of carbon impacts) on avoided emissions from biomethane export, and it is uncertain to what extent the export will be displacing other sources of gas (fossil fuels), rather than contributing to an overall increase in gas use. Whilst it is currently a fair assumption that gas use will continue for some time, and that if that is the case then increased biomethane would be needed to decarbonise the gas grid, there is currently no Government forecast for the annual rate of gas decarbonisation or for how long gas will continue to be a widely used fuel, considering the trend to electrification of heating. Given those uncertainties, the benefit of avoided emissions from biomethane export should be regarded as both declining and increasingly uncertain, the further into the future one looks. Further comments have been made in the Council's responses to the Deadline 4 submissions.</p>
6.6	CCoC, SCDC	<p>BREEAM Do you consider that BREEAM excellent rating for the Gateway Building and Workshop is satisfactorily secured through the Design Code [REP4-085] and dDCO</p>	<p>CCoC considers that the BREEAM excellent rating for the Gateway Building and Workshop is satisfactorily secured through the Design Code [REP4-085] and dDCO [REP4-003]?</p>

		[REP4-003]? If not, please set out justification for this stance and what changes could be made in order to resolve this matter.	
Community			
7.4	Applicant, CCoC	<p>PRoW– management plans In its response to ExQ1.7.23 [REP1-134] CCoC raises a number of points in relation to PRoW. To the Applicant: Please respond to the following points. Where you agree with suggestions please update your application documents accordingly. Where you do not agree, please explain why.</p> <ul style="list-style-type: none"> • The use of safety gates might be off-putting (7.6.14 of the CoCP Part A). • A Requirement to provide that the Construction Traffic Management Plan (CTMP) and CoCP should be approved by the local highway authority (LHA) prior to commencement of any works. • The CTMP or CoCP Part A should provide for condition surveys of affected PRoW, restoration of the 	<p>The Applicant has confirmed that the DCO default position of a permanent public bridleway is to be taken forward.</p> <p>The County welcomes this for the reasons below.</p> <p>CCoC stated in paragraphs 10.26 to 10.35 of its LIR [REP1-133] the concerns it holds regarding the negative impacts of the proposed development on the experience of non-motorised users on the PROW in the vicinity of the WWTP. These impacts will bring a permanent change to the landscape and this will permanently alter PROW users' experience of the countryside. The provision of new rights of access is considered to be important in terms of compensating for these alterations to the landscape.</p> <p>Providing a new bridleway would enhance the connectivity of the local PROW network, particularly for equestrian users and cyclists. The nature of Low Fen Drove Way would be changed from a PROW that circulates a significant infrastructure development, to a more appealing route that offers broader access to the countryside and a wider range of possible destinations. While this does not remove the fact that the landscape of the local countryside would be changed, it goes some way towards offsetting this change.</p> <p>By creating a dedicated PROW, it offers commensurate mitigation for the permanence of the changes to the rural environment that the development would bring.</p>

		<p>full legal width and inspection of works.</p> <ul style="list-style-type: none"> • A Requirement relating to agreement with LHA of a programme of PRow closures and diversions. • The Applicant has stated that access to the new bridleway would be regulated through use of gates and signage – this is not acceptable for a PRow, where access should be unrestricted. The width, surface and boundary treatment of a newly created public bridleway would also need to be agreed with the LHA. • The LERMP does not include any measures detailing the management of PRow during the operational phase of the proposed development. <p>To CCoC: You stated that the proposed bridleway forms an essential part of the mitigation for the development and therefore should be enshrined as a public right of way. Please explain why you consider this to be</p>	
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		essential mitigation and clarify which impacts the proposed bridleway would be mitigating?	
7.6	CCoC	<p>PRoW – restoration</p> <p>In response to ExQ1.7.28 [REP1-079] the Applicant states that Whilst there is no requirement in the draft DCO (App Doc Ref 2.1) [AS-139] specific to restoring PRoWs to a standard acceptable to the highway authority/their previous condition, these measures are outlined in paragraph 7.6.18 of CoCP Part A (App Doc Ref 5.4.2.1) [APP-068]. Requirement 8(1) of the draft DCO (App Doc Ref 2.1) [AS-139], requires that each phase must be undertaken in accordance with the code of construction practice in so far as it relates to the works proposed in the relevant phase and therefore the commitment is secured through that requirement. Are you satisfied with this arrangement? If not please explain the reasons for this.</p>	CCoC is content with this arrangement on the condition that CCoC will be a consultee on the content of the final CoCP Part A and will therefore have the ability to oversee the proposed measures within the document that will impact the PROW network.
7.9	CCoC	<p>Equalities Impact Assessment (EqIA)</p>	The response indicates that there had been previous engagement with this community via the Traveller Liaison Officer at South Cambridge

		Does the Applicant's response to ExQ1.12.6 [REP1-079] address the concern that you expressed in relation to ExQ1.7.39 [REP1-134]? If not, how could your concern be addressed?	District Council, however, no details of the results of this engagement is given in either the Health Impact Assessment (Chapter 12 of the ES) or the Equalities Impact Assessment. If engagement had been unsuccessful we would have expected the use of other agencies in contact with the Traveller Population, e.g. the Ormiston Trust. The Traveller population experience a lower life expectancy, higher infant mortality rate, poorer health outcomes and poorer access to preventative care compared to the general population and there is evidence that mental health problems are more widespread, in addition literacy problems may cause difficulties with reading communications, therefore direct engagement with the local Traveller population is needed.
7.10	Applicant, CCoC	<p>Compliance with policy</p> <p>At para 6.3.5 of its WR [REP1-171] Save Honey Hill Group (SHHG) states that The proposed development fails to accord with Policy 16, in particular Policy 16(f), as it proposes the use of land for regular community recreational use within the consultation area that would surround the new water recycling centre. Please set out your interpretation of part f of Policy 16 of the MWLP.</p>	<p>Paragraph 6.4 and 6.5 of the MWLP explains the purpose of Policy 16: Consultation Areas:</p> <p>“6.4 Consultation Areas (CAs) are buffers around Mineral Allocation Areas (MAAs), Mineral Development Areas (MDAs), Waste Management Areas (WMAs), Transport Infrastructure Areas (TIAs) and Water Recycling Areas (WRAs).</p> <p>6.5 They are designated to ensure that such sites are protected from development that would prejudice operations within the area for which the buffer is identified, or to protect development that would be adversely affected by such operations (for example residential development being located close to a waste site and subsequently suffering amenity issues).”</p> <p>In essence the Policy is designed to prevent encroaching development from affecting the operation of existing and future safeguarded facilities, such as the existing and proposed Water Recycling Area. (This is in contrast to Policy 18: Amenity Considerations, which is designed to ensure that the development proposed can be integrated effectively with existing or planned (i.e. Development Plan allocations or consented schemes) neighbouring development).</p> <p>Policy 16 states that: “Development within a CA will only be permitted where it is demonstrated that the development will: (c) not prejudice the</p>

			<p>existing or future use of the area (i.e. the MAA, MD, WMA, TIA or WRA) for which the CA has been designated; and (d) not result in unacceptable amenity issues or adverse impacts to human health for the occupiers or users of such new development, due to the ongoing or future use of the area for which the CA has been designated*.”</p> <p>Footnote * is not relevant to this response at this time.</p> <p>Policy 16 sets out the Consultation Areas are defined on the Policies Map, for which one exists for the existing Water Recycling Area and that:</p> <p>“In instances where new mineral development, waste management, transport infrastructure or water recycling facilities of significance have been approved (i.e. of such a scale that had they existed at the time of writing this Plan it could reasonably be assumed that they would have been identified as a MDA, WMA, TIA or WRA), the policy principle of a CA around such a facility is deemed to automatically apply, despite such a CA for it not being identified on the Policies Map.”</p> <p>The existing Water Recycling Centre is identified on the MWLP Policies map and is shown as being within a Consultation Area. However, as set out in the statement above, Policy 16 will be applied in situations where a development of significance have been approved. The proposed new WWTP is itself not within such a consultation area and Policy 16 does not apply to development that is yet to be approved, such as the proposed development and is therefore not relevant.</p>
Compulsory Acquisition (CA) and Temporary Possession (TP)			
8.8	National Highways, Conservators of the River Cam, Network Rail Infrastructure Limited, EA, CCoC, Arqiva Limited, Sky Telecommunications	Statutory Undertakers Please review the Applicant’s D4 submissions and identify any outstanding key concerns or impediments with regard to reaching agreement with the	<p>CCoC is engaged with the Applicant on all the matters related to CA and TP and is confident of reaching agreement with the Applicant before the close of the Examination.</p> <p>Local Highway Authority Protective Provisions – CCoC is continuing discussions with the Applicant although agreement is not yet reached on</p>

	Services Limited, City Fibre Limited, Vodafone, Eastern Power Networks PLC/UK Power Networks, any other relevant Statutory Undertakers	Applicant on CA / TP matters and protective provisions, if necessary. Please also clarify whether you are confident of reaching agreement with the Applicant before the close of the Examination, and if not, any implications for this?	this matter. CCoC is to provide further suggested changes to the Protective Provisions to address the County's concerns.
Design			
9.1	CCoC, SCDC, CCC, any other IPs	Design Code Please confirm whether you are satisfied with the submitted Design Code [REP4-085], and if not, set out the reasons for this.	Cambridgeshire County Council welcomes the submission of the Design Code. In our separate submission, response to Deadline 4, there are comments related to carbon and clarification of figures provided, and suggested additional wording related to the proposed vent stack.
Draft Development Consent Order (dDCO)			
10.14	CCoC	Schedules Please confirm you are satisfied with Schedule 17(4) and the disapplication of the Community Infrastructure Levy Regulations 2010.	CCoC are not a charging or collecting authority under the Planning Act 2008 and Community Infrastructure Levy Regulations 2010 and therefore this is not a matter CCoC can comment upon.
10.19	CCoC	Temporary PRoW closures and diversions / CTMP Regarding the first row on page 9 of your submission [REP2-040] relating to Article 13, the Applicant added R26 (temporary closures to PRoW) to the	CCoC is content with the amendment to the dDCO and with this clarification regarding R9.

		<p>dDCO. In addition, the ExA understands that CCoC would be the discharging authority for the CTMP under R9 of the dDCO [REP4-003]. Do these points alleviate your concerns in this regard?</p>	
10.20	Applicant, CCoC	<p>Proposed bridleway Regarding CCoC's comments in the second row on page 9 of [REP2-040]: To the Applicant a) Please confirm whether the proposed bridleway would be a permissive route or a permanent PRow; and b) If a permissive route, whether this necessitate any amendments to Article 13(4) and Schedule 6, Part 2? To CCoC c) If the bridleway was to be a permanent PRow, please clarify in detail why you consider protective provisions would be required noting that the Applicant does not intend to make any alterations to the route of the proposed bridleway or its surfacing.</p>	<p>It is CCoC's position that a new permanent bridleway would require the installation of gates to secure the route from unwanted vehicular incursion and to act as a deterrent to anti-social behaviour. CCC would therefore require these physical changes to be completed to an appropriate standard in order to facilitate the most practical and cost-effective future maintenance and would require a role in inspection and approval of such works. If protective provisions were not to be applied to the bridleway, CCoC is content to agree an alternative mechanism for doing this with the Applicant. CCoC continues to engage with the Applicant regarding the matter of the bridleway.</p>
Green Belt			

11.4	CCoC	<p>You note in you LIR [REP1-133] that the MWLP does not contain any Green Belt policies. However, do you wish to comment on any other relevant national and local policies with regard to the Proposed Development and Green Belt matters?</p>	<p>As referred to before and above if this proposal were not the subject of a direction under s35 of the Planning Act 2008 making it a project of national significance for which development consent is required under the 2008 Act it would be a waste development proposal that would need to be subject to a planning application under the Town and Country Planning Act 1990 with CCoC as the determining authority in its role as Minerals and Waste Planning Authority. It would then be for CCoC to determine such an application the Cambridgeshire and Peterborough Minerals and Waste Local Plan (MWLP) 2021 as well as having regard to any relevant Local Plan policies.</p> <p>In such circumstances and given that MWLP does not have any specific policies relating to Green Belt the approach CCoC would take would be to apply the National Planning Policy Framework (NPPF) (2023) as well as have regard to relevant policies of the South Cambridgeshire Local Plan as well as Cambridge Local Plan (albeit the site for the proposed new WWTP does not lie in the City Council's part of the Green Belt) as well as any relevant emerging policies of both authorities.</p> <p>The approach CCoC would adopt as determining authority having regard to the NPPF in particular is to note that the fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and their permanence.</p> <p>CCoC would have regard to the fact the policies in the NPPF (contained in Chapter 13) provide clear guidance on proposals affecting the Green Belt, including that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Although there are types of development that are not considered to be inappropriate in the Green Belt, provided they preserve its openness and do not conflict with the purposes of including land within it, the exemptions do not include facilities for the treatment of waste water.</p>
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			<p>CCoC acknowledges that the NPPF states that: - substantial weight should be given to any harm to the Green Belt and 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.</p> <p>The approach CCoC would adopt as determining authority to this would be to acknowledge that the Cambridge Green Belt and its purpose would need to be considered in the context of the proposed development, alongside whether the proposals should be considered as 'inappropriate development' taking account of any relevant case law and consideration of the 'very special circumstances' for the Green Belt as well as any harm and visual impact that would arise from the proposals.</p> <p>CCoC is aware of the conclusions that SCDC and CCC have drawn with regard to whether the proposal is inappropriate development and defer to their judgement and as it would if it would defer to their views and guidance if CCoC was determining authority</p> <p>CCoC would also be guided by SCDC and CCC as to whether very special circumstances exist and whether harm to the Green Belt as a consequence of inappropriateness and any other harm is outweighed by such other considerations.</p> <p>CCoC has not carried out the exercise of a determining authority as that would be inappropriate.</p>
Health			
12.5	CCoC	Existing WWTP – decommissioning phase impacts. In your RR and in	Yes, the response is clarified in REP4-045 - 5.4.2.3 ES Chapter 2 Appendix 2.3 Outline Decommissioning Plan (tracked), which confirm that

		<p>your LIR (paras 7.18 and 7.19) [REP1-133] you raised questions about decommissioning phase impacts. Does the Applicant's response to ExQ1.12.8 [REP1-079] address your concerns? If not, please specify the additional information that you are seeking</p>	<p>the tanks and other equipment will be cleaned before hole will be punched for drainage.</p>
Historic Environment			
13.12	CCoC	<p>Archaeology In response to ExQ1.13.7 and within your LIR [REP1-133], you refer to 'flexibility' being built into the Archaeological Investigation Mitigation Strategy (AIMS). Please review the framework AIMS [AS-088], the CoCP Parts A and B [REP4-040 and REP4-042] and R13 of the dDCO [REP4-003] and clarify whether these are sufficient to address your concerns and if not, the reason for this.</p>	<p>The archaeological evaluation, comprised of geophysical survey and trial trenching, has identified areas of dispersed prehistoric settlement and associated activity within the proposed construction area. The nature of these assets is unreceptive to geophysical survey and its extent is difficult to determine with confidence by trial trenching, particularly with the relatively low percentage of ground cover deployed in the evaluation of this site.</p> <p>In addition to the measures outlined by the Applicant, CCoC would advise that flexibility should be built into the Archaeological Investigation Mitigation Strategy to enable variations to the defined excavation areas; to extend where the proposed limits of excavation prove insufficient to expose the extent of significant archaeology and to reduce where it becomes clear that the limits of excavation extend beyond the extent of significant archaeology.</p>
Landscape and visual			
14.1	Woodland Trust, CCoC	<p>Trees The Arboricultural Impact Assessment [REP1-035] has been updated to reflect standing advice in</p>	<p>Yes. We welcome the update to the AIA [REP1-035] provides adequate tree protection measures for veteran tree 105. This document has now referenced within the Code of Construction Practice parts A and B [REP4-040] / [REP4-042].</p>

		respect of veteran tree T105. Are you satisfied that this overcomes your concern in this regard?	
14.5	CCoC	<p>Policy In your LIR [REP1-133], you predominantly address matters relating to footpaths and their users in the Topic 8 section on Landscape and Visual Amenity. However, you highlight that MWLP Policy 17: Design is relevant but do not appear to conclude on compliance or otherwise with this policy. Please provide your view on whether the Proposed Development would comply with this policy.</p>	<p>As referred to before and above if this proposal were not the subject of a direction under s35 of the Planning Act 2008 making it a project of national significance for which development consent is required under the 2008 Act it would be a waste development proposal that would need to be subject to a planning application under the Town and Country Planning Act 1990 with CCoC as the determining authority in its role as Minerals and Waste Planning Authority. It would then be for CCoC to determine such an application the Cambridgeshire and Peterborough Minerals and Waste Local Plan (MWLP) 2021 as well as having regard to any relevant Local Plan policies.</p> <p>The approach CCoC would adopt to the application of Policy 17 is set out herein:</p> <p>“Policy 17: Design” provides that:</p> <p>All waste management development should secure high quality design. The design of built development should be sympathetic to and, where opportunities arise, enhance local distinctiveness and the character and quality of the area in which it is located. Permission will be refused for development of poor design that fails to take the opportunities available to achieve this.</p> <p>New waste management development must:</p> <p>(a) make efficient use of land and buildings, through the design, layout and orientation of buildings on site and through prioritising the use of previously developed land; not previously developed land;</p> <p>(b) be durable, flexible and adaptable over its planned lifespan, taking into account potential future social, economic, technological and</p>

			<p>environmental needs through the structure, layout and design of buildings and places;</p> <p>(c) provide a high standard of amenity for users of new buildings and maintain or enhance the existing amenity of neighbours;</p> <p>(d) be designed to reduce crime, minimise fire risk, create safe environments, and provide satisfactory access for emergency vehicles;</p> <p>(e) create visual richness through building type, height, layout, scale, form, density, massing, materials and colour and through landscape design;</p> <p>(f) be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);</p> <p>(g) retain or enhance important features and assets (including trees and hedgerows) within the landscape, treescape or townscape and conserve or create key views;</p> <p>(h) provide a landscape enhancement scheme which takes account of any relevant landscape character assessments (including any historic landscape characterisation) and which demonstrates that the development can be assimilated into its surroundings and local landscape character and, where appropriate for the development:</p> <p>(i) provide well designed boundary treatments (including security features) that reflect the function and character of the development and are well integrated into its surroundings; and</p> <p>(j) provide attractive, accessible and integrated vehicle and cycle parking which also satisfies the parking standards of the Development Plan for the area and incorporates facilities for electric plug-in and other ultra-low emission vehicles.</p> <p>For waste management proposals, detailed design guidance can be found in Appendix 3: The Location and Design of Waste Management Facilities. This guidance provides a framework for creating distinctive places, with a consistent and high-quality standard of design. Whilst the guidance</p>
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			<p>provides a degree of flexibility, it will be used to assist in determining whether a proposal is consistent with the approach set out in this policy.”</p> <p>The design of waste facilities therefore needs to accord with the guidance in Appendix 3 of the MWLP. If CCoC were the determining authority for this waste application (as opposed to host authority) then we would consult with the relevant technical experts (statutory consultees) both within the CCoC and the SCDC as well as CCC on matters such as design, landscaping and boundary treatment. Based upon that advice and expressed views CCoC would then assess the proposal against each of the criterion in the policy to determine whether the scheme complies with Policy 17 and MWLP as a whole as well as what weight to give to any other material considerations in the overall planning balance to form an overall conclusion taking the consultee responses into account.</p> <p>CCoC has clearly not carried out this exercise for the purpose of making representations to the ExA as it would be inappropriate and is not in a position to state whether Policy 17 would be complied with.</p> <p>Policy 17 of the MWLP is in the CCoC’s view important and relevant to the EXA and SofS’s assessment and decision it is for the ExA and SofS to decide what weight to give each criterion in the planning balance. If the ExA however has concerns or considers it would be necessary to have further guidance on meeting the specific criterion listed above, then CCoC would be happy to assist in the provision and identification of further guidance and information.</p>
14.10	CCoC	<p>PRoW users Your LIR [REP1-133] in the Topic 8 section on Landscape and Visual Amenity makes reference to the</p>	<p>The impact for PROW users is captured as part of landscape and visual impact. CCoC and the Applicant are in dialogue to confirm the PROW mitigation measures that are appropriate to address the concerns raised in the LIR. (See responses to Question 1.1 and 7.4 above).</p>

		<p>incomplete MWIA [APP-113]. An updated version was provided at [AS-077]. Does this alleviate your concerns in this regard?</p>	<p>It is noted the MHWIA [AS-077] does not, in its assessment of the physical environment impacts of the development (page 10), consider the effects of the development on PROW users whose wellbeing might be negatively impacted by the perceived loss of wildlife habitats or permanent changes to the landscape.</p> <p>Please note as it relates to the updated Mental Health Wellbeing Impact Assessment (MHWIA) (Appendix 12.3) [AS-077] the Public Health concerns given in the County Council's LIR are addressed.</p>
Land quality			
15.1	CCoC	<p>MWLP Policy 5 Do you consider that the Proposed Development accords with MWLP Policy 5? Please justify your response.</p>	<p>Mineral Safeguarding Areas (MSAs) are identified on the Policies Map for mineral resources of local and/or national importance. Policy 5 (Mineral Safeguarding Areas) of the Plan except for certain developments (not applicable in this instance), development within MSAs which is not covered by the above exceptions will only be permitted where it has been demonstrated that: (i) the mineral can be extracted where practicable prior to development taking place; (j) the mineral concerned is demonstrated to not be of current or future value; (k) the development will not prejudice future extraction of the mineral; or (l) there is an overriding need for the development (where prior extraction is not feasible).</p> <p>Within (l), 'overriding need' is to be judged in the planning balance, including in terms of any national considerations, and the impact upon the local economy. The judgement should also consider the cost of, and scope for, developing outside the MSA, or meeting the need for it in some other way. By 'not feasible' in (l), this could include viability reasons.</p> <p>The development is partially located on areas identified as a Chalk Mineral Safeguarding Area and a Sand and Gravel Mineral Safeguarding Area as depicted on the Cambridgeshire and Peterborough Minerals and Waste Local Plan Policies Map. This indicates that in those areas there may be a chalk or sand and gravel mineral reserve in those areas. The Sand and</p>

			<p>Gravel Mineral Safeguarding Area is largely affected by the proposed pipeline from the development to Waterbeach, and the Chalk Mineral Safeguarding Area by the main facility itself. Development will sterilise these resources. The Applicant has provided an estimate of the area of resources that will be sterilised in 5.4.14.5 ES Volume 4 Chapter 14 Appendix 14.5 Mineral Safeguarding Area calculation.</p> <p>It is noted the applicant is proposing to make use of excavated material within the project itself, which is supported. Whilst it would be ideal to enable the sale of any extracted sand and gravel onto the open market, this is unlikely to be a realist prospect. It is proposed that the material extracted is reused on site, and if it were to be managed off site and sold, there would be a shortfall of material for the development, and this would be a less sustainable outcome.</p> <p>In relation to the safeguarded chalk, it can be reasonably argued that the Applicant does comply with criterion (i). Chalk is abundant within the south of the County, to the point of having little to no value at this present time; except where the chalk is of a particular quality or has specific properties, for which specialist quarries have established themselves. The Applicant is proposing to use material extracted within the development, and this is likely the best outcome that can be achieved in relation to the chalk resource. There is unlikely to be a market for additional chalk being extracted at this time, and any additional extraction would result in a depression in the landform which may result in other concerns or the importation of material to fill the void.</p> <p>In contrast, the sand and gravel, does have value and there may be a market for it. The area of the development within the sand and gravel mineral safeguarding area is the transfer pipe. As set out in the Applicant's Mineral Safeguarding Calculation, only the Northern section and Southern section of the pipeline is likely to encounter sand and gravel; the other sections are either too deep in the case of the Transfer tunnel or only</p>
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			<p>encountered sand and gravel in one of the boreholes related to the Outfall pipeline. There may be some limited scope for prior extraction, but given the quantity of sand and gravel likely to be extracted (assuming it varies between 1 and 1.4 metres as per the Applicant's report over a distance of 6,483 metres), and the requirement for material to backfill the pipeline, it would suggest that complete prior extraction is unlikely to be feasible, as the void would then need to be filled with other material. Any partial extraction is likely best addressed through any waste management plan, so the material can be screened and sorted. It is on that basis the CCoC is content that criterion (l) has been satisfied in respect of complete prior extraction is not feasible, and that partial extraction can be addressed through a waste management plan. Should the ExA be of the mind there is an overriding need for the development, Policy 5 would be satisfied.</p>
Materials resources and Waste			
17.2	CCoC	<p>Proposed WWTP – use of resources Please provide a response to ExQ1.17.18 [PD-008] as CCC and SCDC deferred to CCoC on this matter.</p>	<p><i>“Proposed WWTP – use of resources - It has been suggested in some RRs (such as [RR-167]) that the there is no operational reason to replace the existing WWTP and that the plant / equipment is still fit for purpose. On the basis that there is no operational need to replace the existing WWTP, should the use of resources and the generation of waste (as explained in ES Chapter 16 [APP-048]) to build the proposed WWTP and associated works be given positive, neutral or negative weight in the planning balance?”</i></p> <p>The use of resources and generation of waste is a byproduct of the proposed development, the development is either needed or not needed. Constructing the development without the use of resources or waste is not possible.</p> <p>In the case that the ExA decides that there is not a demonstrated need for the development, then the ExA would need to balance the use of resources against the benefit it would provide.</p>

17.3	CCoC	<p>LIR Para 11.6 of your LIR [REP1-133] states that Requirement 9 a) xi and b) xi details the need for a Waste Management Plan. This should include the additional mitigation measures. However, no apparent mitigation measures are set out in the LIR. Please specify the additional mitigation measures that you consider should be included, and provide justification for your suggestions</p>	<p>In relation to this topic (material resources and waste), CCoC has not identified additional mitigation that it is seeking to have incorporated. The text in the LIR should have read as follows. “11.6 Requirement 9 a) xi and b) xi details the need for a Waste Management Plan. This should include the <u>any</u> additional mitigation measures.”</p>
17.4	Applicant, CCoC	<p>MWLP Policy 26 and importation of materials for landscaping In the event that any material is imported for landscaping, would there be a mechanism for the relevant planning authority to ensure that the criteria in MWLP Policy 26 can be satisfied before the material is imported?</p>	<p><i>POLICY 26: OTHER DEVELOPMENTS REQUIRING IMPORTATION OF MATERIALS</i></p> <p><i>Proposals for developments which require the importation of significant quantities of minerals and/or inert waste, will only be permitted where it can be demonstrated that: (a) the proposal does not prejudice the restoration of mineral extraction sites; (b) there is a proven need for the material to be imported; (c) any mineral or waste imported will be used in a sustainable manner; and (d) the minimum amount of material is imported, consistent with the purpose of the development.</i></p> <p><i>The determination of planning applications will have regard to the objectives of the mineral and waste spatial strategies in this Plan.</i></p> <p>In the event that the SoS issues the order granting planning permission, then permission will have been granted for the proposal as determined. Unless the DCO explicitly states that offsite material cannot be brought onto the site, the source of the material that the developer uses to</p>

			<p>construct the development is at their discretion. In the [REP1-061] the 7.17.4 SoCG – Cambridgeshire County Council the applicant states in relation to the creation of the earth bank that the importation materials will not be required import material from beyond this project.</p> <p>If there was insufficient material, under the Deposit of Waste: Code of Practice (DoW:CoP), (also sometimes referred to as CL:AIRE after the organising body), a development such as this could import material from another construction site at which it is unwanted material. Under DoW:CoP the material is not considered to be waste. Alternatively, the developer could buy in bulk fill or soils, but this would be a greater cost to the developer than accepting material from another site. In both these cases, the developer would be operating within the granted planning permission.</p>
Noise and Vibration			
18.2	CCoC	<p>Assessment – scoping out of emergency generators Within your LIR [REP1-133] (para 7.12), you suggest that further noise and vibration assessments would be needed to ensure that there would be no impacts on human health from noise and vibration when the fixed plant locations have been confirmed. In regard to emergency generators, the Applicant responded and stated [REP1-078] that Generator noise emissions</p>	<p>The response from the applicant does not satisfy CCoC concerns regarding the emergency generators being scoped out. The standard expectation, in such circumstances, is that a BS4142; 2019 noise assessment or predicted noise assessment (if the plant is not yet installed/operational) is completed and the level of the noise sources (actual or predicted) at the facades of the nearest noise sensitive premises, relative to the day and night time background noise levels (LA90), reported and made available. We can see no justification for a lower standard of assessment. The role of emergency generators is such that they could come into operation day or night. A BS4142 assessment should appropriately account for the cumulative impacts of noise where there is more than one source. The location of the generators and other plant, relative to the bund, needs to be accounted for within</p>

		<p>would not be significantly greater than other individual source of noise at the site during operation (i.e. due to occupational noise requirements for employees working at the site). Overall noise levels at the nearest receptors during emergency generator testing would therefore not significantly increase prediction results and would not affect assessment outcomes or significance. Do these comments satisfy your concerns regarding emergency generators being scoped of the ES? If not, please justify your stance.</p>	<p>the noise assessment: the position of a noise source relative to a barrier (to sound) will affect the degree of noise reduction that the barrier affords.</p>
Odour			
19.1	CCoC	<p>Clarification of any outstanding matters from CCoC's RR [RR-001] Within your RR [RR-001], it is stated that paragraph 5.1.5 of the Preliminary Odour Management Plan [AAP-140] mentions controls 'expected' to be included. More certainty as to the necessary mitigations</p>	<p>We do not consider these matters to have been suitably addressed as they relate to the vent stack proposed and discussions with the Applicant are continuing.</p> <p>Policy 18 of the MWLP states: 'Proposals must ensure that the development proposed can be integrated effectively with existing or planned (i.e. Development Plan allocations or consented schemes) neighbouring development'. As the follow on use is likely to be a mixed-use development the applicant needs to</p>

		<p>needed are sought. You also reference the need to assess the proposal against Policy 18: Amenity Considerations of the MWLP. Do you consider these matters now suitably addressed?</p>	<p>ensure than any odour from the decommissioned site does not pose a risk to human health.</p> <p>The term 'vent stack' and the mitigation measures referred to in the text from [AS-107] Appendix 18.4: 5.1.5, cited below, leads us to be concerned about the potential impact of any emissions from the vent stack on sensitive receptors, notwithstanding the description given in the newly submitted design code [REP4-085]. We seek more clarity as to the necessary mitigations, that mitigations are phrased in definite terms, and as such can be incorporated into the Odour Management Plan (DCO requirement 20).</p> <p>Appendix 18.4: Preliminary Odour Management Plan [AS-107] states, at 5.1.5 that:</p> <p><i>“Monitoring measurements proposed at the site of the existing Cambridge WWTP will include:...</i></p> <ul style="list-style-type: none"> • <i>Vent stack and carbon filter:</i> - <i>Monitoring equipment will be installed to comply with Applicant’s, and the suppliers’, documented standards for dosing facilities.</i> - <i>The monitoring facilities are expected to include odour measurements (in the vent stack) and air pressure measurement (in the shaft)”.</i> <p>For a permanent odour source CCoC would expect to see vent mitigation measures, including height and their specifications, having been informed by a more detailed odour assessment that includes dispersion modelling. Having regard to the information on the assessment and control of odour impacts, the vent stack, as an odour source, has not been included within the dispersion modelling</p>
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			<p>(Appendix 7.2 Dispersion Model results [AS-062]). Justification for this not having been done is needed.</p> <p>A description of the vent stack to clarify it's function, how often it is likely to emit odour, and scale would assist in understanding it's impact. In discussions with the Applicant more clarity has been provided, however providing this in the Preliminary Odour Management Plan would better inform the Detailed Odour Management Plan to be produced as part of Requirement 20.</p>
19.2	CCoC	<p>Impacts from the proposed waste water transfer tunnel vent stack</p> <p>Do you consider that the Applicant has satisfactorily addressed your concerns regarding the proposed ventilation stack and potential impacts on future residential receptors? If not, please confirm why.</p>	<p>CCoC does not consider that the applicant has satisfactorily addressed our concerns regarding the proposed vent stack and potential impacts on future receptors. Please see our response to question 19.1 above.</p>
Traffic and Transport			
20.7	Applicant, CCoC	<p>Pedestrians</p> <p>The Applicant has noted that the shared use path between Horningsea Road and the proposed WWTP would not be lit [REP1-079; ExQ1.20.25 b)]. Would this be safe, particularly during the hours of darkness, and would it encourage people to travel by</p>	<p>CCoC have discussed this matter with The Applicant who are responding to the question. We welcome proposed amendments to the lighting strategy to include the potential for surface level stud lighting or low level lighting and to be explored at the detailed design stage.</p> <p>To note we would seek to closely follow the newly updated guidance from the Institution of Lighting Professionals and Bat Conservation Trust. We would look to keeping K values down to 2700 or below, and wavelengths peaking above 550 nm.</p>

		modes other than the private car?	
20.10	Applicant, CCoC	<p>Use of Automatic Number Plate Recognition (ANPR) geofencing</p> <p>Section 8.2 of [REP4-072] has been amended to replace ANPR monitoring with geofencing. The amendment also suggests that only HGVs would be monitored.</p> <p>To the Applicant:</p> <p>a) Why has this change been made; and</p> <p>b) Would non-Heavy Goods Vehicles (HGVs) (including Light Goods Vehicles (LGVs) and employees'/visitors' cars/vans) be monitored / geofenced? If so, how?</p> <p>To CCoC:</p> <p>c) Please provide your opinion on this change to the proposed method of vehicle monitoring / limiting vehicle movements to specific routes.</p>	CCoC welcomes the amendment and monitoring with geofencing.
20.12	CCoC	<p>Local diversion of Horningsea Road</p> <p>With reference to the drawings at Appendix E of [REP4-087] please provide your views in respect of the</p>	Cambridgeshire County Council is satisfied with the proposals by the applicant when laying the pipeline under Horningsea Road.

		<p>proposed method for laying the pipeline under Horningsea Road, in particular, whether you are satisfied for one lane to stay open when the adjacent lane has been excavated?</p>	
20.13	Applicant, CCoC	<p>Abnormal Indivisible Load (AIL) access to Waterbeach Pipeline construction corridor</p> <p>At Appendix F of [REP4-087], the Applicant states that AIL to site access CA20 would travel across Clayhithe Bridge and that mitigation measures apply to all AIL routes, the main site and the Waterbeach pipeline. However, in response to ExQ1.20.19 [REP1-079] the Applicant said in respect of AIL that These movements would travel to their destination via the Strategic Road Network, the A14, and use the slip roads at Horningsea Road. The Applicant does not expect to have to use any AIL for the Transfer Tunnel or Waterbeach Pipeline. The ExA also understood from the</p>	<p>c) CCoC can confirm Clayhithe Bridge (no.502644) can accommodate the vehicle proposed by Anglian Water.</p>

		<p>discussion at ISH3 that AIL would only travel to the site of the proposed WWTP via J34.</p> <p>To the Applicant:</p> <p>a) Please clarify the situation and provide a clear and definitive position on AIL routing.</p> <p>b) If AIL would cross Clayhithe Bridge, how would it reach Clayhithe Bridge – via J34 and Horningsea or via the A10 and Waterbeach?</p> <p>To CCoC:</p> <p>c) Please provide your observations on this apparent change to AIL routing. Are you satisfied that AIL could be routed to CA20?</p>	
Water resources			
21.6	National Trust, NE, CCoC	<p>Outline water quality monitoring plan</p> <p>Do you consider that the outline water quality monitoring plan [REP2-028] sufficiently addresses your concerns regarding dewatering, contamination, monitoring and impacts on downstream ecological receptors? If not, please set out clearly why you consider</p>	CCoC is now satisfied with the outline Water Quality Monitoring Plan.

		this to be the case and any suggested amendments to the document with justification.	
21.9	CCoC	<p>Surface water drainage The Applicant submitted an updated drainage strategy at D4 [REP4-074] – please review this document and clearly set out any principles you consider to be omitted or amendments to the drainage strategy, with justification, bearing in mind the outline nature of the design proposals.</p>	CCoC welcomes the changes to the Drainage Strategy [REP4-074] and is satisfied detailed matters can be addressed as part of Requirement 15.
21.17	CCoC	<p>Water Quality Do you consider your comments in your LIR [REP1-133] under para 14.21 regarding the need for details on water quality and quantity to be controlled through the CEMP to be satisfactorily addressed by the Applicant?</p>	CCoC is now satisfied the CEMP provides the controls for water quality and quantity.