

Comments on the Applicant's D4 Submissions

This document sets out the comments by Cambridgeshire County Council (**CCC**) on the Applicant's Deadline 4 (**D4**) submissions. The tables below set out the document in question that the Councils are commenting on, together with the relevant paragraph or reference number.

Except where expressly stated otherwise below, the Councils reiterate and rely on their comments submitted to the ExA at previous deadlines.

2.1 Draft Development Consent Order (Tracked) [REP4-004]

Topic	Paragraph Number	Councils' Comment
Detailed Design - Odour	7. (2)	Odour assessment odour concentrations at all sensitive receptors (Figure 4.5 In the Odour assessment (document no 5.4.18.2) should define "sensitive receptors" and therefore should include recreational users
Outfall – OTF.06	3.11 (page 35)	The Council welcomes the commitment for the " <i>detailed design will produce additional CFD modelling to confirm the riverbed and bank protection measures are appropriate and sufficient</i> ". This, along with previous updates to the Outline Outfall Management and Monitoring Plan, addresses the Council's previous concerns regarding scouring.

4.8 Hedgerow Regulations & Tree Preservation Plans [REP4-021]

Topic	Paragraph Number	Councils' Comment
		The Council welcomes the update of the Tree Preservation Plans to show the retention of important Hedgerow H23-H24. This addresses the Council's concern regarding the removal of important hedgerow – matter resolved.

5.2.10 ES Chapter 10 Carbon [REP4-026]

Topic	Paragraph Number	Councils' Comment
Baseline carbon emissions for comparison – general	Summary + Table 2.3 and section 3.2,	The revised wording and choice of baseline scenarios alongside the applicant's preferred option and alternative design scenarios are now much clearer and provide for a more logical assessment of the carbon impacts of the proposed development.
Baseline and assessment of effects – construction phase	4.2 and table 4.1	Whilst the title of section 4 is 'assessment of effects', these paragraphs are mainly concerned with comparison of the preferred design to that of an alternative design. Comparison of the proposed development to the baseline of no construction is not included here, but is addressed in Table 4.2. The proposed development is expected to lead to carbon emissions from the construction phase of 53,000 tonnes CO ₂ e (according to the Applicant's calculations) compared to a baseline of zero (for no construction).
Baseline and assessment of effects – operation phase	Section 4.4 and Table 4.5 and Figures 4.1, 4.2, 4.3	This now provides a clearer view of the carbon impacts of the proposed development, compared to the existing WWTP. It shows that, according to the Applicant's calculations, the <i>gross</i> emissions for the proposed development would be higher (over double those of the existing plant) in year 1 (forecast to be 2028), with the existing plant calculated to produce 1,010 tCO ₂ e in 2028, compared to 2,730 tCO ₂ e for the proposed new plant. However, <i>net</i> emissions, after taking into account avoided emissions from biomethane export and CHP energy use, would be lower for the new plant (according to the Applicant's calculations), with negative emissions of -3,490 tCO ₂ e compared to 640 tCO ₂ e for the existing plant in year 1.
Operational emissions per Ml of recycled water	Table 4.6	This table provides an interesting measure of carbon intensity, of tCO ₂ e per Ml of recycled water. It is noted that the gross emissions per Ml of the proposed development are expected to still be higher than the current plant (in year 1) whilst the net emissions would be lower.
Residual significance of effect – operational emissions, and Offsets	4.4.20 and Table 4.8	Paragraph 4.4.20 states that "the gross emissions of both options, when addressed as part of the CMP lead to carbon neutrality..." – this is due to the Applicant's commitment in the Carbon Management Plan (CMP) to secure sufficient long term offsets. However, the offsets market is complex and still developing, and it is not certain that sufficient long term offsets will be available.
Whole life carbon	4.6 and Table 4.10 and Figures 4.4 and 4.5.	Table 4.10 provides a clear assessment and comparison to the baseline, of the whole life carbon emissions to the year 2090, according to the Applicant's calculations. This shows that the <i>gross</i> emissions would increase for the proposed development, compared to the baseline, but that <i>net</i> emissions would reduce, after taking into account avoided emissions from biomethane export or CHP energy use.

5.4.2.1 ES Chapter 2 Appendix 2.1 Code of Construction Practice Part A [REP4-040]

Topic	Paragraph Number	Councils' Comment
Public Rights of Way	7.6.14 to 7.6.19	- CCoC is engaging in discussions with the Applicant regarding the paragraphs of the CoCPA that affect PROW. The Applicant has verbally agreed to make some narrative changes to the text of the document to address CCoC's concerns.

5.4.2.5 ES Chapter 2 Appendix 2.5 Lighting Design Strategy [REP4-048]

Topic	Paragraph Number	Councils' Comment
Lighting design objective 6	4.2.19	<p>Secondary mitigation for operational lighting impact to Low Fen Drove Way Grassland and Hedges County Wildlife Site and bats on pages 216 and 2017 (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, 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.</p>
Lighting design objective 6	4.2.20	<p>The Council welcomes commitment within Lighting Design Objective 6 of the Lighting Design Strategy [REP4-048] that <i>"Lighting design must maintain the dark corridor along the county wildlife site adjacent to the disused railway line"</i> (para 4.2.20). However, this wording isn't accurate. The Council recommends it be updated to maintaining a dark corridor the disuses railway located <u>within</u> the Low Fen Drove Way Grasslands and Hedges County Wildlife Site.</p> <p>The Council notes that the above wording within the Lighting Design Strategy [REP4-048] appears inconsistent with the Applicant's Response to ExA Hearing Actions [REP4-087]</p>

		<p>hearing action point 67, which states that “<i>ES Appendix 2.5 Lighting Design Strategy (App Doc Ref 5.4.2.5) does not currently commit to ensuring a dark corridor along the discussed railway section of the CWS is maintained. The Applicant will amend the strategy to include a commitment to ensure that lighting within the Proposed WWTP does not contribute to increasing the existing CWS lighting levels at the disused railway track.</i>”</p> <p>The Council seeks clarification from the Applicant on this matter, and the Lighting Design Strategy be updated accordingly to either (a) expressly refer to a dark corridor along the Low Fen Drove Way Grasslands & Heges CWS or (b) be consistent with the response to hearing point 67.</p>
--	--	---

5.4.8.24 ES Chapter 8 Appendix 8.24 Outline Outfall Management & Monitoring Plan [REP4-060]

Topic	Paragraph Number	Councils' Comment
		<p>The Council welcomes update to the Outline Outfall Management Plan [REP4-060] / [REP4-061], which addresses some of the Council's concerns.</p> <p>However, this does not address the County Council's concerns regarding the omission of details of creation, management and monitoring of 'other neutral grassland' to be created within works nos. 32 & 39. Currently, there is no mechanism to secure detailed design, management or monitoring for this habitat. The scheme will result in the change of this habitat from ruderal/ephemeral to 'other neutral grassland' and therefore, this must be captured within the BNG provision, including 30 year management.</p> <p>Please refer to County Council's Comments on the Deadline 2 Submissions [REP3-057] for further information.</p>

5.4.10.2 ES Chapter 10 Appendix 10.2 Outline Carbon Management Plan [REP4-064]

Topic	Paragraph Number	Councils' Comment
Offsetting	4.1, particularly 4.1.4 to 4.1.6	Noting that it is currently very challenging to secure credible, verified, long term offsets, the Council supports the Applicant's general principles set out in paragraph 4.1.5, but is concerned that there is not currently a solution to this challenge.

		It is also noted that the scale of offsets proposed by the Applicant is in line with the Applicant's expected carbon emissions for the operational phase, and not for the whole life of the proposed development. Specifically, emissions from the construction phase are not mentioned so it would appear that there are no plans to offset those emissions.
--	--	---

7.17 Design Code [REP4-085]

Topic	Paragraph Number	Councils' Comment
Carbon	3.7 CAR.01, chart below and CAR.02	The text of CAR.02, which specifies a 45% capital reduction, is not aligned to the chart above, which states that 55% reduction (from the alternative DM0 design) will be secured in the DCO. The current proposed design is expected to lead to 53,000 tCO ₂ e of carbon emissions from construction, according to the Applicant's Environmental Statement Chapter 10 (revised) [REP4-026].
Ventilation Stack (at the interception shaft) and odour control	3.13 VST.01	The Council agrees the need for the applicant to coordinate with the follow-on master developer regarding the positioning and proximity of the stack to proposed development, however the requirement to locate the stack at least 15m from "inhabited dwelling/building/office" should also include formal greenspace used for recreation, PROW, and sensitive uses e.g. school playing fields.

8.19 Applicant's comments on Deadline 3 submissions [REP4-086]

Topic	Paragraph Number	Councils' Comment
Ancient woodland and veteran trees	2.1.1	The Council welcomes further clarification / amended documents – matter resolved
Priority habitats	2.1.2	The Council welcomes further clarification / amended documents – matter resolved
Environmental Statement Book of Figures		The Council welcomes further clarification – no further comments

8.21 Applicant's Post Hearing Submission (CAH1 & ISH3) [REP4-088]

Topic	Paragraph Number	Councils' Comment
ISH3 item 4 Carbon – costs of offsetting	4.14	The Applicant has stated at ISH3 that the Regulator may not approve the expenditure for the costs of offsetting. It would be helpful to clarify what would happen if such expenditure was

		not approved – would the offsets mentioned in the Carbon Management Plan [REP4-065] then not be implemented?
--	--	--