

Cambridge Waste Water Treatment Plant Relocation Project
Anglian Water Services Limited

Applicant's Response to ExQ2

Application Document Reference: 8.22

PINS Project Reference: WW010003

APFP Regulation No. n/a

Revision No. 01
19 February 2024

ExQ2	Question to	Question	Response
1.1	Applicant, Cambridgeshire County Council (CCoC)	<p>Legal agreement</p> <p>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.</p>	<p>This contribution is under review following a meeting with Cambridgeshire County Council on 31 January 2024. However, the Applicant included this contribution as a result of an earlier meeting with Greater Cambridge Shared Planning Services at which the Applicant confirmed it did not propose to modify its design to make modifications for equestrian users, however it could agree to a contribution to the installation of such measures by the County Council if they were being pursued in the area.</p>
1.2	Applicant, IPs	<p>Policy</p> <p>The National Planning Policy Framework was revised on 19 December 2023. Do you consider this to have any implications for the application?</p>	<p>The Applicant considers the revised NPPF does not include any substantive changes which have implications on the decision to be made on this application. There are, however, a number of changes which should be noted and are relevant and which the Applicant would wish to draw to the Secretary of State's attention.</p> <p>Paragraph 7 now states that <i>"the purpose of the planning system is to contribute of the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner"</i> (our emphasis). In its responses to ExQ1-2.2, 2.3, 2.19 and 2.23 [REP1-079] the Applicant makes reference to this overarching aim of achieving sustainable development as part of its justification and very special circumstances case for the Proposed Development noting that relocation of the existing WWTP will deliver a highly sustainable vacant brownfield site in accordance with the terms of the HIF award to meet a strategic development need for the site to be redeveloped to deliver a new low-carbon city district making a key contribution to the development of Cambridge, supporting growth in the economy and making an important contribution to meeting strategic economic and housing objectives (consistent with the objectives at sections 6 and 11 of the NPPF). The regional and national significance of this has been recognised in the SoS (DEFRA) s.35 direction (18 January 2021) and its importance elevated by the announcement by the Prime Minister and the Secretary of State for Levelling Up, Housing and Communities on 24 July 2023 (and updated on 19 December 2023) to 'supercharge' Cambridge.</p> <p>Paragraphs 60-63 of the revised NPPF under the heading 'delivering a sufficient supply of homes' maintains reference to the Government's objective of significantly boosting the supply of homes, and emphasizes the importance of meeting housing needs by adding that <i>"the overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community"</i>.</p> <p>Although policy relating to decision making on proposals affecting the Green Belt are unchanged, paragraph 145 of the revised NPPF introduces the statement that <i>"there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process"</i>. This amendment confirms that Councils are no longer legally required to review their Green Belt boundaries, an outcome which potentially creates a greater obstacle to the achievement of meeting housing and employment needs. In specific relation to the Proposed Development, the emerging GCLP does not propose any significant changes to the Cambridge Green Belt boundary to meet development needs through the release of existing Green Belt land. This amendment is therefore unlikely to have any impact on the spatial development strategy set out in the emerging GCLP unless, in the event that consent is not given for the Proposed Development, Cambridge City Council and South Cambridgeshire District Council are driven to identify sites outside Cambridge in the circumstances addressed in their LIRs at paragraphs 6.78 - 6.82 [REP2-042 and REP4-092 respectively]. The difficulty presented to the</p>

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			<p>Councils in order to achieve their spatial strategy and meet their development needs sustainably in that circumstance is, in the opinion of the Applicant, made greater by this amendment to the NPPF. In the Applicant's opinion, this change to the NPPF places even greater importance on the effective use of land within existing urban areas to meet development needs and the weight that should be given to this aspect of the Applicant's very special circumstances case (consistent, for example, with NPPF paragraph 89).</p>
1.3	Applicant, Environment Agency (EA)	<p>Legislation Noting paragraph (para) 1.10.1 of the Planning Statement [REP1-049], does the Levelling Up and Regeneration Act 2023 have any implications for the Proposed Development, including with reference to Part 7 Nutrient pollution standards?</p>	<p>The new laws introduced through the Levelling Up and Regeneration Act 2023 which came into effect as of the 26 October 2023 will in the words of the Government “<i>speed up the planning system, hold developers to account, cut bureaucracy, and encourage more councils to put in place plans to enable the building of new homes</i>”. Those parts relating to planning range from major innovations such as a new system of development plans and the replacement of environmental assessment with a new regime of environmental outcome reports to more incremental technical reforms to, for example, heritage legislation but most of the measures which are now enshrined into law and applicable in England will not be introduced until after associated regulations and changes to national policy are in place, and a number of sections in the Act will require secondary legislation. None of the changes to planning law (specifically within Parts 3, 4, 6 and 8) or compulsory purchase (Part 9) brought in immediately on Royal Assent or after 2 months of Royal Assent is considered to have implications on the decision to be made on this application.</p> <p>In regard to Part 7 Nutrient Pollution Standards, s168 of the Act introduces a requirement that any sewerage undertaker whose plant discharges treated effluent into a nitrogen sensitive catchment area or a phosphorus sensitive catchment area in England (and is not otherwise exempted) must secure that, by 1 April 2030 (or such other date as specified), the plant will be able to meet the nitrogen nutrient pollution standard, and on and after that date secure that the plant meets that standard. Neither the existing WWTP or Proposed Development is currently identified as discharging treated effluent into a nitrogen sensitive or a phosphorus sensitive catchment area. The effects of Part 7 of the Act do not, therefore, apply to the Proposed Development. However, as stated in the Applicant's response to Hearing Action Point 71 [REP4-087], phosphate is currently designated as “Poor” WFD status, and hence of particular concern to the Environment Agency in this instance. The assessment in ES Chapter 20 [REP4-036], based on indicative consent conditions, shows a benefit to final effluent discharge for Total Phosphorous and Ammoniacal Nitrogen, for the proposed indicative consent conditions compared to the existing consent conditions. The Proposed Development has also been designed to provide adequate area for the introduction of additional treatment facilities to ensure the WWTP meet the requirements of Part 7 of the Act in respect of the nitrogen nutrient pollution standard.</p>
1.4	Applicant	<p>Ministerial statements Please provide copies of any Written Ministerial Statements which you consider to be of particular relevance to the application, or signpost to where these have been provided.</p>	<p>Please refer to Deadline Submission 4: REP4 –088- Applicant's Post Hearing Submission (CAH1 &ISH3), Agenda Item 9 – Green Belt, the applicant proposes that the written ministerial statements of July 2023 and December 2023 which make specific reference to this project in the context of supporting the continued economic growth of Cambridge through the Government's 'Vision for Cambridge 2040' are relevant. These statements (with embedded links to them) are as follows:</p> <ol style="list-style-type: none"> 1. Prime Minister and Secretary of State for DLUHC Statement 24 July 2023 2. Secretary of State for DLUHC Statement 19 December 2023 <p>Downloaded copies of these statements are provided at Appendix C of this document.</p>

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1.5	Applicant	Documents Please provide copies of the 'Greater Cambridge Biodiversity SPD 2022' and the 'Doubling Nature Strategy 2021' referred to at Compulsory Acquisition Hearing 1 (CAH1).	Please see 8.22 ExQ2 1.5 Appendix A Greater Cambridge Biodiversity SPD 2022 and 8.22 ExQ2 1.5 Appendix B Doubling Nature Strategy 2021 provided as part of the Deadline 5 submissions.
1.6	Applicant	Action Points The final Issue Specific Hearing 3 (ISH3) Action Point [EV-008v] set out below does not appear to have been addressed in your document [REP4-087]. Please address. Clarification around the Applicant's post hearing submission [REP1-082] Appendix C – Working Timetable, including whether it accurately identifies that the remediation of the existing WWTP would occur before commissioning of the proposed WWTP and implications for this if not.	The Applicant responded to this Action Point at page 61 of [REP4-087] and is unclear whether the ExA requires further information. In any event, having reviewed the answer, the Applicant has taken the opportunity to elaborate on its response here: The Applicant notes the reference to remediation in the ExA's Action Point 61 but considers this should be a reference to decommissioning, as remediation is not referenced in Appendix C of [REP1-082], save in relation to Hartree housing delivery, and has therefore prepared a response on this basis. The decommissioning of the existing Cambridge WWTP is due to commence as soon as flows are diverted to the new WWTW. There will be an overlap between the decommissioning and commissioning phases. This is addressed at paragraph 5.1.15 of the Outline Decommissioning Plan (Application Reference 5.4.2.3) [REP4-044]. In summary, the reason for the overlap is because the two processes are linked and as processes are established at the new WWTW, final effluent discharges will reduce at the existing WWTP. In terms of implications, the final effluent flows from both sites will be constrained as per the terms of the relevant permits with the Environment Agency. The Applicant will begin the process of surrendering permits for the existing WWTW once commissioning of the new WWTW is complete.
1.7	Cambridge City Council (CCC)	Local Impact Report (LIR) Please clarify whether the number '325' presented in para 6.99 of your LIR [REP2-043] should instead reflect the number '1,425' presented in para 6.35?	No response from the Applicant.
1.8	Applicant	ES Chapter 2: Project Description In 'Annex A – Consistency Review Overview' to your Deadline (D) 4 covering letter [REP4-001] and in other locations such as Table 2-23: Building sizing of [REP4-022] you state that maximum floor area of the Gateway Building would be 58.2m x 17.1m. However, the ExA understands that the Gateway Building would have two floors. Is the 58.2m x 17.1m measurement the building's footprint? What is the total floor area (all floors) of the building in square metres? What is the total amount of office floorspace in the building in square metres?	The applicant responded as suggested with only the maximum parameter of the footprint of the gateway building as believed this was a maximum parameters clarification point. The Gateway Building Footprint is 58.2m x 17.1m Total floor area for both floors is: Ground Floor 665 m, First Floor 560 m ² = Total: 1225 m ² (Excluding external walls, entrance ways, accesses, overhangs etc) Total amount of office floorspace is: Ground floor 321m ² , First Floor 192m ² = Total of 513m ² Of that office space, the total space for desks and office workers is: Ground Floor 272 m ² , First Floor 167m ² . Total amount of meeting rooms are: Ground Floor 6m ² , First Floor 76m ² + 213m ² for the discovery centre meeting space and toilets. All other remaining space is taken up by plant rooms, kitchens, toilets, messing facilities, stair wells, storage and corridors
1.9	Applicant	Updated documents It is important for clarity, and to avoid any confusion, that when submitting updated documents, the track changed versions accurately reflect all changes made. The ExA notes that, for example, the D4 track changed version of ES Chapter 8: Biodiversity [REP4-025] does not appear to show all the changes made since the previous version [REP2-007] (e.g. Table 2-10 relating to 'No net loss of habitat through creation – landscape masterplan, bullet point 5 relating to hedgerows and para 3.1.23 relating to hedgerows). Please address this and ensure that any future amended documents are checked thoroughly before submission. Additionally, para 3.1.23 of [REP4-025] (and [REP2-024]), which indicates no important hedgerows would be affected appears to be at odds with the Hedgerow Regulations and Tree	The Applicant has identified that the track changed version of ES Chapter 8 Biodiversity (App Doc Ref 5.2.8) submitted at D4 was erroneously labelled as the clean version. This confusion was compounded by the clean version submitted still having some track changes present. The Applicant apologises for any confusion caused and has submitted corrected versions to replace those currently listed on the PINS website under D4 submissions. With respect to the important hedgerows, the Applicant's surveys (ES Appendix 8.2 Hedgerow Baseline Technical Appendix (App Doc 5.4.8.2) [APP-087]) find that the hedgerow illustrated within the Hedgerow Regulations and Tree Preservation Plans [REP4-021], between H19 and H20, is not an important hedgerow. This is illustrated upon Figure 8.16 within the ES Chapter 8 Book of Figures Biodiversity (App

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		<p>Preservation Plans [REP4-021] and Schedule 16, Part 2 of the draft Development Consent Order (dDCO) [REP4-003] relating to 'hedgerow shown with an [sic] pink line between point H19 and H20'. Please clarify.</p>	<p>Doc Ref 5.3.8) [REP2-019].</p> <p>The Hedgerow Regulations and Tree Preservation Plans [REP4-021] and Schedule 16, Part 2 of the draft Development Consent Order (dDCO) [REP4-003], have been updated to reflect this and submitted at Deadline 5. The Applicant confirms that no important hedgerows will be impacted by the Proposed Development.</p>

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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.</p> <p>To CCoC: b) Please clarify whether in your view, the Proposed Development would be compliant with all aspects</p>	<p>This policy seeks to support proposals for new water recycling capacity or proposals required for operational efficiency (with such proposals including the improvement or extension to existing Water Recycling Centres, relocation of WRCs), particularly where it is required to meet wider growth proposals identified in the Development Plan.</p> <p>In this case the Proposed Development is for the relocation of an existing WRC where it is required to meet wider growth proposals identified in the emerging Greater Cambridge Local Plan and the existing adopted Cambridge and South Cambridgeshire Local Plans, as set out in the Planning Statement (REP1-049).</p> <p>The Proposed Development will also provide additional capacity to treat the wastewater from the Waterbeach catchment and anticipated housing growth in the combined Cambridge and Waterbeach catchment area. The Proposed Development will have a designed capacity sufficient to meet population growth projections plus an allowance for climate change into the 2080s (para 1.3.3 of Planning Statement REP1-049).</p> <p>It is the Applicant's view that this Policy supports the principle of the Proposed Development as it is required to meet the wider growth proposals identified in both the emerging and adopted Cambridge and South Cambridgeshire Development Plan.</p> <p>The policy also contains four criteria that proposals must demonstrate they comply with. The first of these (Criterion (a)) is that there is a suitable watercourse to accept discharged treated water and there would be no unacceptable increase in the risk of flooding to others. In this case the suitable watercourse is the River Cam and the Proposed Development will discharge to the Cam, replacing the same arrangement in respect of the existing WWTP. This is addressed in ES Chapter 20 on Water Resources [REP4-036] and demonstrates that this water course is suitable to accept the discharged treated water. Paragraph 4.2.33 of ES Chapter 20 concludes that the impact of the final effluent discharge to water quality in the River Cam is minor beneficial. In respect of the risk of flooding to others, the Applicant's work to date indicates that the proposed development will not act as a source of flooding, and that it poses no greater flood risk than the existing WWTP. As a result the Applicant considers that there will be no unacceptable increase in the risk of flooding to others for the purposes of the policy. The Applicant is currently working with the EA to agree an updated FRA and is currently addressing feedback received following a meeting on 24 February. The Applicant will hopefully be able to submit a updated FRA into the examination prior to ISH3.</p> <p>Criterion (b) states that if a new site is less than 400m from existing buildings normally occupied by people then an odour assessment demonstrating that the proposal is acceptable will be required with appropriate mitigation measures. The site selection process for the Proposed Development included a 400m buffer zone around residential properties (Table 2.1 of APP-075, 5.4.3.2 ES Volume 4 Chapter 3 Appendix 3.2 Stage 1 Site Selection Report – Initial Site Selection). There are, therefore, no existing buildings within 400m of the proposed WWTP. In addition, the ES includes at Chapter 18 Appendix 18.2 an Odour Impact Assessment [AS-104]. This document concludes at paragraph 6.1.4 that reasonable odour mitigation steps have been taken during design development so that the assessment concludes that the CWWTPRP will have 'Negligible' odour impact to all known receptors. The operation of the proposed CWWTPRP will be in compliance with the Odour Management Plan. This combined approach of 'design' and 'active management' assures 'appropriate measures to minimise odour' for the Project has and will continue to be taken. Therefore, the predicted residual effect of the odour impacts associated with the proposed Project would be "not significant". The Proposed Development therefore complies with Criterion (b).</p>

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			<p>Criterion (c) states that a new site should avoid land within flood zone 3 unless there is a clear and convincing justification not to do so, the proposal is supported by evidence of sustainability benefits, evaluation of site options and risk management through the application of the sequential and exception tests. The application is supported by a Flood Risk Assessment [APP-151] which shows that the main treatment works site is located within Flood Zone 1. The 'water compatible' infrastructure (outfall, pipelines and tunnel) which would be located in Flood Zones 2 and 3 would not be considered to be at high risk from fluvial flooding, assuming the application of best practice construction methodology. See also the answer to ExQ2 21.2.</p> <p>Criterion (d) states that adequate mitigation measures will address any unacceptable adverse environmental and amenity issues raised by the proposal, which may include the enclosure of odorous processes. The ES Non-Technical Summary [APP-032] sets out the summary of effects when mitigation measures are included at Section 4. This demonstrates that any unacceptable adverse environmental issues are addressed through the various mitigation measures proposed.</p> <p>In conclusion it is considered that the Proposed Development complies with Policy MW11.</p>

ExQ1	Question to	Question	
3.1	Natural England (NE)	Soil management Further to your concerns regarding the outline Soil Management Plan (oSMP), including around the management of peat soils, are you satisfied that the revised version [REP1-033] has addressed your concerns? If not, please explain the reasons why.	No response from the Applicant.
3.2	Applicant	Soil management Does the oSMP [REP1-033] make provision for pre-construction soil testing of all agricultural land within the Order limits, noting CCoC's LIR comments [REP1-133] in this respect? If not, how would appropriate methods of soil handling, storage and reinstatement be ensured?	The Applicant confirms that, following discussions with Natural England, it has been agreed that pre-construction soil resource and ALC surveys will be undertaken on areas of temporary land take (such as the area of land required for the construction of the Waterbeach transfer pipeline). The intent to undertake these surveys is reflected in the Outline Soil Management Plan (App Doc Ref 5.4.6.3) provided at Deadline 5. Requirement 9(2)(b)(v) of the draft DCO (App Doc Ref 2.1) [REP4-003] secures the preparation of a detailed Soil Management Plan to accord with the outline SMP. Soil resource and ALC surveys have already been completed for areas land required for the construction of the proposed WWTP including landscape masterplan area and access road.
3.3	Applicant	Agricultural impact The extent of farm holding 'G040' (Poplar Hall Farm – 26.63ha) on Figure 6.11 of [AS-049] is not clear. Please address this. Please also clarify para 3.2.21 of [REP1-031] which states that there would be permanent acquisition of land approximately 24ha (i.e. most of G040) and para 4.2.11 of ES Chapter 6 [AS-024] which states there would be a high impact from permanent acquisition of land and whether this accurately reflects the extent of such compulsory acquisition powers as shown on the Land Plans [REP1-016] for the extent of G040 (and relevant plots in the dDCO [REP4-003] and Statement of Reasons [REP1-009]).	Extent of farm holding Farm holding 'G040' (Poplar Hall Farm) is located between Horningsea Road, Field Land, the River Cam and the A14 bridge, with one portion of the holding just north of the A14 bridge. Figure 6.11 (Appendix E of this document) extracted and appended to this answer shows the extent of the land parcel. Permanent acquisition The ES Appendix 6.2 Agricultural Impact Assessment (App Doc Ref 5.4.6.2) [REP1-031] and ES Chapter 6 Agricultural Land and Soils (App Doc Ref 5.2.6) [AS-024] were prepared using earlier versions of land plans, the land plans have evolved and areas of land acquisition have changed. Updated versions of ES Appendix 6.2 Agricultural Impact Assessment (App Doc Ref 5.4.6.2) and ES Chapter 6 Agricultural Land and Soils (App Doc Ref 5.2.6) have been provided at Deadline 5 to reflect the land acquisition as represented in the latest Land Plans (App Doc Ref 4.4) with the exception of parcel 021b. As a result of discussions in the Examination Phase, parcel 021b will be subject to only 1.09ha permanent acquisition, while the remaining 2.3ha will be subject to temporary land acquisition. Farm holding 'G040' will be subject to both temporary and permanent land acquisition. The updated areas are 1.76ha (3.8% total farmed area) permanent land acquisition (land shown shaded pink (021b, 021p, 021r and 021s) and brown on the Land Plans (App Doc Ref 4.4) [REP1-016] and 7.63ha (17% total farmed area) temporary land acquisition (land shown shaded green on the Land Plans (App Doc Ref 4.4) [REP1-016]). There will be 6.33ha of land subject to restrictive covenants (shaded blue) or subsoil acquisition (021e, 021c, 021t, 021k, 021l), which will not be taken out of agriculture. Furthermore, these 6.33ha of land will not be removed from agriculture during construction as works will take place below cultivation depth. The impact to G040 will be medium due to disruption to farming activities as parcel 021b (Land Plans App Doc Ref 4.4) will not be farmable during construction. As a result, the significance of effect will be moderate, which is significant. See ExQ2.3.5 for a description of the Proposed Development's impact on farming operations both during and after the construction phase.
3.4	Applicant	Agricultural impact Please clarify whether the table at Appendix B of [REP1-031] differentiates between compulsory acquisition of freehold, compulsory acquisition of rights and temporary possession and if not, whether this has any implications for assessments? Please also clarify, noting ExQ2.3.3 above, whether the figures in columns 3, 4 and 5 relating to 'G040 Poplar Hall Farm' are correct.	The table in Appendix B of ES Appendix 6.2 Agricultural Impact Assessment (App Doc Ref 5.4.6.2) [REP1-031] does not differentiate between compulsory acquisition of freehold and compulsory acquisition of rights, but it does distinguish temporary possession. Temporary possession is inferred by taking the value in 'Land take Order Limits based on Con 3 Works Plan (Ha)' (column 4) and subtracting the corresponding value in 'Permanent Land Take' (column 5). This does not have any implications for the assessment as the methodology accounts for the differential impacts of temporary and permanent land acquisition. The figures relating to G040 have been corrected to 26.63 ha, 19ha and 14ha for columns 3, 4 and 5 respectively in the version of ES Appendix 6.2 Agricultural Impact Assessment (App Doc Ref 5.4.6.2) provided at Deadline 5.

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3.5	Applicant	<p>Agricultural impact Please signpost to where you addressed [RR-239] with specific reference to the concerns raised within it around the farming business. Please also provide an update in the Compulsory Acquisition Schedule [REP4-015] relating to negotiations with this party (identified as CA-056).</p>	<p>The Applicant responded to the farming business related points in [RR-239] during CAH1 (see paragraph 4.1.1 in the Applicant's Post Hearing Submission (CAH1 & ISH3) (App Doc Ref 8.21) [REP4-088]), commenting that it is not yet known whether the impact to the business operation would be over one or two growing seasons, but that a worst case has been adopted for the estimation of compensation. Where possible, the Applicant has sought to mitigate the impacts to the farming business. In the event this causes a financial impact, the farming business will be entitled to claim for compensation.</p> <p>The Applicant has considered the impacts as part of the Agricultural Impact Assessment (App Doc Ref 5.4.6.2) [REP1-031].</p> <p>The Applicant has been in direct discussion with Mr Phillips [CA-056] over the last two years and, as a result of those discussions, the Applicant has sought to mitigate the impact of construction by relocating the construction compound of Shaft 4 to the southern boundary of the property and will create separate construction access to both the construction compound and the area for the construction of the outfall structure. It is intended that the creation of these separate construction accesses will keep the interaction of these construction activities and the occupation of the Farm to a minimum. In addition, the reinstatement of any land drains will be undertaken by the Applicant. In the event there is a financial impact, Mr Phillips will be entitled to claim for compensation for those business losses.</p> <p>The table below summarises the main parcels where construction activity will take place and provides a commentary on the likely impact of that activity on farming operations.</p> <table border="1" data-bbox="1341 968 2617 1894"> <thead> <tr> <th data-bbox="1341 968 1768 1003">Parcel number on the Land Plans</th> <th data-bbox="1768 968 2193 1003">Activity in that Parcel</th> <th data-bbox="2193 968 2617 1003">Impact on farming operations</th> </tr> </thead> <tbody> <tr> <td data-bbox="1341 1003 1768 1115">021c, 021f, 021g</td> <td data-bbox="1768 1003 2193 1115">Construction of Waste Water Tunnel at around 19m and restrictive covenant area</td> <td data-bbox="2193 1003 2617 1115">None</td> </tr> <tr> <td data-bbox="1341 1115 1768 1192">021s, 021r</td> <td data-bbox="1768 1115 2193 1192">Shafts 4 and 5 with compounds</td> <td data-bbox="2193 1115 2617 1192">Unavailable for farming for around 18 months</td> </tr> <tr> <td data-bbox="1341 1192 1768 1270">021g</td> <td data-bbox="1768 1192 2193 1270">Temporary access to Shaft 5 area</td> <td data-bbox="2193 1192 2617 1270">Unavailable for farming for 3 months</td> </tr> <tr> <td data-bbox="1341 1270 1768 1388">021d (see paragraph after this table)</td> <td data-bbox="1768 1270 2193 1388">Temporary use to install Waterbeach Pipeline South</td> <td data-bbox="2193 1270 2617 1388">Unavailable for farming for 6 to 9 months, potentially 2 growing seasons</td> </tr> <tr> <td data-bbox="1341 1388 1768 1894">021b</td> <td data-bbox="1768 1388 2193 1894"> Mostly temporary uses relating to the construction of the Outfall and Final Effluent and Storm Pipelines. 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The Applicant noted on 16 February 2024, Parcel 021b had recently been ploughed. </td> </tr> </tbody> </table>	Parcel number on the Land Plans	Activity in that Parcel	Impact on farming operations	021c, 021f, 021g	Construction of Waste Water Tunnel at around 19m and restrictive covenant area	None	021s, 021r	Shafts 4 and 5 with compounds	Unavailable for farming for around 18 months	021g	Temporary access to Shaft 5 area	Unavailable for farming for 3 months	021d (see paragraph after this table)	Temporary use to install Waterbeach Pipeline South	Unavailable for farming for 6 to 9 months, potentially 2 growing seasons	021b	Mostly temporary uses relating to the construction of the Outfall and Final Effluent and Storm Pipelines. Permanent uses for ecological mitigation and BNG provision (see Appendix C (page 79) in [REP4-054])	The whole of the Parcel is likely to be unavailable for farming for up to two years. 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			<p>It should be noted that, in relation to Parcel 021d (New Rights for Waterbeach Pipelines South) the area of the New Right acquired permanently will not extent to the full area of the parcel because the area of restriction will be between 8 and 12 metres in width along the Parcel. This is explained in paragraph 6.3.3 of the Statement of Reasons (App Doc Ref 3.1) [REP1-009]. Even then, normal arable farming operations will not be affected in restriction area.</p> <p>In summary, with the mitigation described above in place, the Applicant believes Poplar Hall Farm will be able to continue to operate as a farming business during the Proposed Development's construction phase. After the construction period, Poplar Hall Farm will be able to function as it did before the construction phase of the Proposed Development, with very little impact on farming activity.</p> <p>The Applicant was asked by the Mr Philips' landlord for all communication regarding Poplar Hall Farm to be made to them. As a result, the Applicant has had regular discussions with the landlord regarding the impact of the Proposed Development on Poplar Hall Farm and the mitigation of those impacts on both the landlord and the tenant.</p> <p>The Applicant has updated the Compulsory Acquisition Schedule regarding the negotiations with this party.</p>

ExQ1	Question to	Question	Response
5.1	NE, CCoC	Monitoring and mitigation 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 for this and any changes you would wish to see.	No response from the Applicant.
5.2	Applicant	Statement of Common Ground (SoCG) with the Wildlife Trust The SoCG with the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire [REP4-084] has been signed by the National Trust, but not the Applicant. Please ensure that both parties sign the SoCG if it is in final form and submit it at D5.	The Applicant notes the comment and a final form of the SoCG signed by both the Applicant and The Wildlife Trust will be submitted at Deadline 5.
5.3	Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire	Ecological impacts on Stow-cum-Quy Fen Site of Special Scientific Interest (SSSI) Within the signed updated SoCG between you and the Applicant [REP4-084], you consider that There is potential for adverse ecological impacts on sites such as Stow-cum-Quy Fen SSSI. Please set out clearly what adverse ecological impacts you consider could occur with justification.	The Applicant notes that the Environmental Statement concludes that adverse effects of increased recreational pressure will not arise in respect of Stow-cum-Quy Fen SSSI [REP4 – 024], at paragraphs 4.3.12 - 4.3.16. As stated at the issue specific hearing, the Applicant is providing a significant area of recreational green space at a location where lawful access to recreational land is currently highly limited. To that extent the Applicant is, in effect, delivering a de facto Suitable Alternative Natural Greenspace (SANG) at distance from the SSSI. Furthermore, the recreational facilities would only be accessible to local users as no car parking provision is being made. The Applicant believes that, overall, its proposals are therefore likely to reduce impact on the SSSI, rather than increase it.
5.4	National Trust	Recreational impacts on Stow-cum-Quy Fen SSSI You raised concerns within your relevant representation (RR) [RR-031] regarding increased recreational pressure on Stow-cum-Quy Fen SSSI from increase disturbance, damage and contamination. However, you also suggest [RR-031] that there are opportunities which have been missed in the wider area to provide better access for multiple users. Might enhancements to increase access within and around Wicken Fen exacerbate suggested recreational pressure on Stow-cum-Quy Fen SSSI?	The Applicant acknowledges that the provision of the proposed bridleway could have the potential to act as a conduit for additional recreational users as new housing in North and East Cambridge is delivered in the future. The bridleway proposals are not, however, giving rise to such potential impacts at present and the Proposed Development is not giving rise to those impacts; it would be the new housing which would do this. It should also be noted that the route was promoted at the express request of stakeholders, through consultation, including Cambridgeshire County Council as a means of mitigating recreational impacts.
5.5	NE	Recreational impacts on Stow-cum-Quy Fen SSSI Please confirm your position regarding the potential for increased recreational pressure on Stow-cum-Quy Fen SSSI and reasons for this, noting that the Initial Principal Areas of Disagreement Document [REP4-076] indicates your satisfaction with the matter on page 12.	The Applicant recognises that there is uncertainty in respect of these impacts, and proposes that they are best addressed at the strategic level, through engagement with all relevant stakeholders, including the promoters of potential housing developments being identified through the emerging local plan process. To that end it proposes that a Combined Recreational Group (CRG) should be formed to manage this risk. This CRG would be entirely independent of the Applicant and the Proposed Development. However, in recognition of the potential uncertainty, the Applicant considers that it would be appropriate to contribute towards the establishment and operation of this group. This is discussed further in response to Question 5.9 below.
5.6	CCoC	Recreational impacts on Stow-cum-Quy Fen SSSI 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?	
5.7	CCoC	Recreational impacts on Stow-cum-Quy Fen SSSI 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 you also be content to manage visitor pressure in this way?	
5.8	Applicant	Wicken Fen Vision Area South Cambridgeshire Local Plan 2018 (SCLP) Policy NH/6 relates to Green	For ease of reference, the relevant extract of policy NH/6 is set out below:

ExQ1	Question to	Question	Response
		<p>Infrastructure protection and enhancement. Wicken Fen Vision Area is identified within the SCLP as a targeted area within the Green Infrastructure Strategy Network. Notwithstanding information provided in [REP1-054], please set out further how the Proposed Development would comply with all elements of this policy.</p>	<p><i>1. The Council will aim to conserve and enhance green infrastructure within the district. Proposals that cause loss or harm to this network will not be permitted unless the need for and benefits of the development demonstrably and substantially outweigh any adverse impacts on the district's green infrastructure network.</i></p> <p><i>2. The Council will encourage proposals which:</i></p> <p><i>a. Reinforce, link, buffer and create new green infrastructure; and</i></p> <p><i>b. Promote, manage and interpret green infrastructure and enhance public enjoyment of it.</i></p> <p><i>3. The Council will support proposals which deliver the strategic green infrastructure network and priorities set out in the Cambridgeshire Green Infrastructure Strategy, and which deliver local green infrastructure.</i></p> <p><i>4. All new developments will be required to contribute towards the enhancement of the green infrastructure network within the district. These contributions will include the establishment, enhancement and the on-going management costs.</i></p> <p>In relation to criterion 1, the proposed development will not build on any green infrastructure including existing open space, sports or recreational land, and therefore, the proposed development will not cause harm or loss of the green infrastructure network in the district. As such, the proposed development complies with criterion 1.</p> <p>It is also important to note that recreational connectivity is central to the design of the Proposed Development by providing connections to the existing PRoW and a new bridleway, which aligns with the objective set out in criterion 2 of SCLP Policy NH/6.</p> <p>Section 2.9 (Mitigation measures adopted as part of the Proposed Development) of Environmental Statement Chapter 8: Biodiversity [REP4-024] sets out the mitigation measures included in the Proposed Development which aim to conserve and enhance biodiversity through improvement of green infrastructure. This includes a Landscape, Ecological and Recreational Management Plan (LERMP) (REP4-056) and landscape design masterplan. These have been developed to complement regional and local initiatives including the Wicken Fen Vision; the 22-hectare footprint of the plant is encircled by a landscaped and planted earth bank situated within the broader LERMP area of around 70-hectares. This would help contribute toward the delivery of green infrastructure within the Wicken Fen Vision area, consistent with its inclusion as a targeted area within the Green Infrastructure Strategy Network. This is in line with the objective of criterion 3 of Policy NH/6. This is a particularly important part of the Proposed Development to deliver biodiversity benefits. As this will also contribute towards the enhancement of the green infrastructure network within the district, this measure is in line with the requirement of criterion 4.</p> <p>The other mitigation measures developed, which are in line with objectives set out in SCLP Policy NH/6 to conserve and enhance green Infrastructure also include:</p> <ul style="list-style-type: none"> • design measures as part of the outfall to minimise loss of riparian habitat; • specific measures within the LERMP (REP4-056) in relation to controls on lighting; and • Measures included within the Code of Construction Practice (CoCP) (REP4- 040) including, but not limited to, section 7.2 (Ecology and Nature Conservation) in Part A. <p>As demonstrated above, the proposed development complies with all elements of SCLP Policy NH/6.</p>
5.9	Applicant	<p>Landscape Ecological and Recreational Management Plan (LERMP) Please confirm whether the Advisory Group referred to in para 4.1.2 of the</p>	<p>The Advisory Group referred to in the LERMP will not review potential recreational pressure impacts on Stow-cum Quy Fen SSSI. This is not the purpose of the LERMP Advisory Group.</p>

ExQ1	Question to	Question	Response
		<p>LERMP [REP4-056] would also review any recreational pressure impacts on Stow-cum-Quy Fen SSSI as a result of the Proposed Development; The ExA understands from ISH3 that the Advisory Group would not be secured through the dDCO, rather you intend to make this is a corporate commitment. However, paragraph 4.1.2 of the LERMP states that it would be enforceable through the dDCO. Please clarify this point; Given NE's reported agreement that an Advisory Group would sufficiently mitigate the impacts from recreational pressure on Stow-cum-Quy Fen SSSI [REP4-076] and CCoC's request for funding to deliver this [AS-179], Please confirm whether you intend to make any provisions for resourcing of the Advisory Group, such as through a Planning Performance Agreement, and if so, how this would be secured; and d) It is understood that a meeting with the Advisory Group was to take place in January 2024 – please provide an update on the outcomes of this meeting with regards to the Proposed Development.</p>	<p>The Applicant convened the first meeting of a wider area group (known as the "Combined Recreational Group" on 24 January 2024. The operation of this group is not directly linked to the proposed development but recognises the wider regional pressures on sites such as Stow cum Quy SSSI, and that they may be subject to increased user pressure in the future as a result of strategic housing growth in the wider area. The members of the group are: The Applicant, The National Trust, Natural England, Quy Fen Trustees, Marshall Properties Group, The Wildlife Trust, and Cambridgeshire County Council. It has also been agreed to include Cambridge Past Present and Future (CPPF) and the Cambridge Local Access Forum in the future.</p> <p>The Applicant is in discussion on an appropriate level of contribution to make towards the establishment and governance structures of this group, which will be secured through s.106 agreement.</p>
5.10	Applicant, NE, South Cambridgeshire District Council (SCDC)	<p>LERMP and wider connectivity Please provide an update on any progression regarding the wording and scope of the LERMP [REP4-056] in respect of wider connectivity concerns and on-going management measures for protected species.</p>	<p>As stated at the issue specific hearing, the Applicant, considers that the LERMP delivers and secures all appropriate habitat which protected species within this area, might rely upon. This is in combination with the appropriate species mitigation licences for badger, water vole and bats; BNG commitments; mitigation and monitoring measures as provided within the CoCP Parts A and B; and a construction and operation lighting design that accords with best practice measures for bats. Together, these provide the mechanisms to avoid, mitigate, compensate and enhance for biodiversity across the Scheme Order Limits. These measures combined support enhanced ecological connectivity and continued functionality across the local landscape.</p> <p>With respect to recreational connectivity, the Applicant provides a response within 5.3-5.7 and 5.9.</p> <p>The Applicant has sought a date for a final combined meeting between SCDC and CCoC to close out the remaining points on management measures for protected species. It is agreed that this meeting will need to occur between Deadline 5 and ISH3. The Applicant is awaiting confirmation from SCDC and CCoC of their availability in this period.</p>
5.11	Applicant	<p>LERMP Please provide a response to CCoC comments regarding the LERMP [REP4-056] contained within its summary of oral submissions from ISH3 [AS-179] (page 7). Please liaise with CCoC to ensure that there is full understanding between both parties as to how species and habitat mitigation would be handled.</p>	<p>As stated at the issue specific hearing, the Applicant, noting separate regimes for protected species and habitats (secured through appropriate licences and BNG commitments), considers that the LERMP delivers and secures all appropriate habitat which protected species within this area might rely upon.</p> <p>The Applicant has sought a date for a final combined meeting between SCDC and CCoC to close out the remaining points on habitat mitigation. It is agreed that this meeting will need to occur between Deadline 5 and ISH3. The Applicant is awaiting confirmation from SCD and CCoC of their availability between this period.</p>
5.12	NE	<p>Outline water quality monitoring plan Has the updated outline water quality monitoring plan [REP2-028] addressed your concerns regarding the impacts on designated sites through increased flood levels and mitigating impacts on Wilbraham Fen SSSI?</p>	<p>The Applicant can confirm that it has responded further to Natural England's comments on the Outline Water Quality Monitoring plan and is awaiting any further response or agreement to the proposals as presented.</p>
5.13	Applicant	<p>NPSWW para 3.1.6 and 3.1.7 Your comments submitted at D4 [REP4-087] in response to Action Point 61 are noted, including that the wording of R25 of the dDCO would secure a</p>	<p>The Applicant respectfully disagrees with the ExA's interpretation of Requirement 25. Requirement 25 requires the submission of an updated biodiversity net gain report at paragraph 25(2) and paragraph 25(4) then secures the construction and operation of the authorised development in accordance with that report. The report may or may not</p>

ExQ1	Question to	Question	Response
		report rather than a financial obligation. However, it appears to the ExA that R25 could potentially secure a financial obligation and evidence of such a financial obligation would need to be submitted to the relevant planning authority in order to discharge the requirement. Therefore, please set out how R25 would comply with paras 3.1.6 and 3.1.7 of NPSWW and the relevant paragraphs of the Planning Practice Guidance in this regard. How would the Proposed Development demonstrate the exceptional circumstances necessary for the use of a negatively worded requirement which could secure a financial obligation?	provide for the payment of a financial contribution, and if so, such a contribution would need to be secured by way of a separate agreement, namely a Section 106 agreement, and not pursuant to Requirement 25 itself.
5.14	Applicant	<p>Examples of providers of river units for Biodiversity Net Gain (BNG) Please provide examples of providers of river units for BNG – the ExA notes your response to the action point 62 [REP4-087], but requests that examples are provided for review by the ExA.</p>	<p>As described in REP4-087 the Applicant is in discussion with a variety of organisations to secure appropriate units, but those projects are not yet at the delivery stage. The Applicant is in the early stages of commercial negotiations with potential partners or providers, and it is therefore not appropriate at this stage to provide details for review by ExA.</p> <p>The Applicant is confident that such units can be procured and that the DCO provides the necessary safeguards to ensure that they will be forthcoming.</p> <p>With the BNG regime now having commenced, there are a number of commercial providers of river units available to developers. The providers include The Environment Bank and BNG Partnership.</p>
5.15	CCoC, SCDC	<p>Securing BNG Do you consider that the dDCO and supporting documents adequately secure 20% BNG for all unit types?</p>	No response from the Applicant.
5.16	EA, NE, CCoC, SCDC,	<p>Reedbed 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>	No response from the Applicant.
5.17	CCoC	<p>Impacts on Low Fen Drove Way Grasslands and Hedges County Wildlife Site (CWS) and River Cam CWS 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>	No response from the Applicant.
5.18	CCoC	<p>Impacts on Low Fen Drove Way Grasslands and Hedges CWS 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>	No response from the Applicant.
5.19	CCoC	<p>River Cam CWS Please confirm if the amendment made to R7 of the dDCO, which now</p>	No response from the Applicant.

ExQ1	Question to	Question	Response
		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.	
5.20	CCoC	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.	No response from the Applicant.
5.21	SCDC	Mitigation You requested [RR-004] further clarification regarding Table 2-8 of ES Chapter 8 which details the maximum design envelope for biodiversity assessment – do you consider that this has this been addressed by the Applicant's subsequent submissions, including in updated versions of ES Chapter 8 (including [REP4-024])? If not, please clearly set out your concerns and how they could be resolved.	No response from the Applicant.
5.22	SCDC	Mitigation At D4 [REP4-094] you state that Details regarding potential riverbed scour during flood events have not been submitted as yet and is a concern as excessive scour can impact both aquatic and riverbank habitats. Additional Computational Fluid Dynamics (CFD) modelling of the outfall and impacts on riverbed scour are now proposed to be secured through the Design Code [REP4-085]. Do you consider this satisfactory? If not, please set out clearly why and how this could be resolved.	No response from the Applicant.
5.23	CCoC	Code of Construction Practice (CoCP) Parts A and B 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?	No response from the Applicant.
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.	<p>The Applicant refers to the CoCP Part A Section 7.2 Ecology and Nature Conservation which includes specific requirements in relation to INNS. The Applicant notes that the CoCP sets out the framework upon which detailed construction environment management plans (CEMP) are required to accord with, in line with the Invasive Alien Species (Enforcement and Permitting) Order 2019, and Wildlife and Countryside Act 1981 (as amended). The CoCP is not intended to provide rigid, detailed and prescriptive plan at this stage, recognising that time to the point of construction is such that conditions 'on the ground' may alter. The detailed CEMP will include specific measures relevant to the circumstances of the phase to which the plan applies. Under requirement 9 the CEMP for each phase will pass to the relevant local authority for approval and this would provide opportunity for detailed scrutiny in relation to the specific measures relevant to the phase, including those related to the control of invasive non-native species.</p> <p>In relation to discussions including in relation to concerns on INNS the Applicant has sought a date for a final combined meeting between SCDC and CCoC to understand remaining concerns including those related to the understanding on how invasive non-native species would be identified and controlled. It is agreed that this meeting will need to occur between Deadline 5 and ISH3. The Applicant is awaiting confirmation from SCD and CCoC of their availability between this period.</p>

ExQ1	Question to	Question	Response
5.25	Applicant	<p>Impacts on veteran trees</p> <p>The CoCP Part A [REP4-040] was updated at D4 to refer to the Arboricultural Impact Assessment (AIA) Waterbeach Pipeline [REP1-036] as requested at ISH3. However, para 7.2.66 refers to drawings TPP_WATERBEACH_1_2 to PP_WATERBEACH_15_2 of the AIA – the drawings contained within the AIA [REP1-036] are marked as revision B (or 'Rev B') – the CoCP Part A should be updated to refer to the revision number for these drawings to ensure accuracy.</p>	Paragraph 7.2.66 of the Code of Construction Practice Part A (App Doc Ref 5.4.2.1) has been updated to remove reference to the specific drawing numbers and to instead signpost to the appendices where the drawings are located to prevent any unnecessary document updates should the drawings be refined at detailed design. The update has been provided as part of the Deadline 5 submissions.
5.26	Applicant	<p>Important hedgerows</p> <p>During ISH3 the ExA asked for all plans and documents to be updated to ensure that they reflected your commitment that Horizontal Directional Drilling (HDD) would be used to avoid impacts on important hedgerows in relevant locations. Whilst some of the supporting documents have been updated at D4, the design plans [AS-156] have not been. The ExA requests that the design plans are updated to show where HDD would take place to ensure consistency across all supporting documents.</p>	The Detailed Design Plans showing the Waterbeach Pipeline long sections (App Doc Ref 4.14) have been updated to reflect the commitment to the retention of the important hedgerow through the use of HDD. The update has been provided as part of the Deadline 5 submissions
5.27	CCoC	<p>Important hedgerows</p> <p>Do you have any outstanding concerns regarding the impact of the Proposed Development on important hedgerows?</p>	No response from the Applicant.
5.28	Applicant, CCoC, SCDC	<p>Bats</p> <p>Please review and provide a comprehensive response to comments from Chris Smith [REP4-098].</p>	The Applicant has provided a response to REP4-098 in the Applicant's comments on Deadline 4 submissions (App Doc Ref 8.23).
5.29	NE	<p>Bats</p> <p>Do you consider that the information supplied is sufficient to determine the effect of the Proposed Development on populations of barbastelle bat for the purposes of the Environmental Impact Assessment? If not, what additional information do you consider is required? Please refer to comments from Chris Smith [RR-083, REP2-071 and REP4-098] in answering these questions.</p>	No response from the Applicant.

ExQ1	Question to	Question	Response
6.1	Applicant	<p>Updates to ES Chapter 10: Carbon [REP4-026] at D4 Please respond to the following points:</p> <p>a) Why was Table 2.2 amended to remove Anglian Water carbon models from the list of desktop information sources used to inform the assessment?</p> <p>b) Why have the figures in Table 3.2 been amended substantially?</p> <p>c) There are referencing errors at paras 4.6.20 to 4.6.25 – please correct these.</p> <p>d) Para 4.6.26 states that the Alternative Option of DCO construction model, using biogas in Combined Heat and Power (CHP) during operation (Figure 4.10) shows the scale of emissions are greater than those tested against the 6th Carbon Budget sector decarbonisation trajectories. However, Figure 4.10 does not appear to show this – please review the information and update accordingly.</p> <p>e) At ISH3 you were asked to provide the net carbon emissions per mega litre for the existing Waste Water Treatment Plant (WWTP). Table 4.6 has been updated, but still does not provide the requested information. Please update the table accordingly.</p>	<p>a) In response to Hearing Action Point 36, the Applicant amended ES Chapter 10 Carbon (App Doc Ref 5.2.10) [REP4-026] to present a “do-nothing” baseline and the Delivery Milestone Zero (DM0) as an alternative design stage. The top row of Table 2-2 (including reference to Anglian Water’s construction carbon models) was removed as construction baseline emissions are now zero, therefore no models are used in the construction baseline.</p> <p>b) In response to Hearing Action Point 36, the Applicant amended ES Chapter 10 Carbon (App Doc Ref 5.2.10) [REP4-026] to present a “do-nothing” baseline with the operational carbon emissions of the existing Cambridge WWTP as the operational baseline. Table 3-2 was updated to reflect this new operational baseline.</p> <p>c) The reference errors have been corrected in the updated ES Chapter 10 Carbon (App Doc Ref 5.2.10) provided at Deadline 5.</p> <p>d) The Applicant has updated paragraph 4.6.26, and subsequent figures 4.9-4.11 to correctly align the conclusions and figures in the updated ES Chapter 10 Carbon (App Doc Ref 5.2.10) provided at Deadline 5.</p> <p>e) The Applicant updated Table 4-6 in ES Chapter 10 Carbon (App Doc Ref 5.2.10) [REP4-026] to include the existing Cambridge WWTP emissions. The information requested is in the row labelled as ‘Baseline (Existing WWTP)’.</p>
6.2	Applicant	<p>ES Chapter 10: Carbon No assessment of the carbon impacts of the Proposed Development using the CHP option appear to have been presented for construction, e.g. in Table 4.1 of [REP4-026]. In order to understand all potential carbon emissions and effects during the construction period, the CHP option should be presented and assessed throughout ES Chapter 10, or justification provided to explain why the CHP option during construction has not been presented.</p>	<p>A separate construction model for the CHP option has not been calculated. The reasoning for this is provided under Table 4.10 of ES Chapter 10 Carbon (App Doc Ref 5.2.10) [REP4-026], as follows: <i>“**Capital carbon emissions for the CHP option has used the same construction carbon assessment as the biomethane production to represent a worst-case position for this option. In reality, less carbon intensive infrastructure would be required for a CHP installation.”</i></p>
6.3	Applicant	<p>Design Code Does Design Code [REP4-085] ‘CAR.10’ need updating given that it suggests that carbon reduction targets would be reported to ‘PINS’ (as well as ‘Key Stakeholders/The Council’) which would be unlikely to be the case. In addition, the wording of this Design Code appears to be in draft or unfinished. Please review and update as necessary. The aim of Design Code ‘CAR.01’ is difficult to understand. Please reword this to be clearer.</p>	<p>The Applicant has updated CAR.10 and CAR.01 of the Design Code accordingly.</p>
6.4	CCoC, SCDC, CCC	<p>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 [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>The Applicant considers that the ES, appropriately assesses the potential impacts, and the oCMP and Design Code [REP4-085], through the DCO, secure appropriate mitigation, monitoring and reporting measures.</p>
6.5	SCDC	<p>D4 updates Do you consider that the updates to ES Chapter 10 [REP4-026], the oCMP [REP4-064] and provision of the Design Code [REP4-085] sufficiently address your comments [REP4-094] regarding the ability to allow for design refinement and carbon data updates?</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 [REP4-003]? If not, please set out justification for this stance and what changes could be made in order to</p>	<p>No Applicant response</p>

ExQ1	Question to	Question	Response
		resolve this matter.	
6.7	Applicant, SCDC	<p>South Cambridgeshire Local Plan Policy CC/3</p> <p>Your summary of ISH3 oral submissions [REP4-094] states that The commitment to achieve Net Zero operational emissions, along with the installation of a 5.6MWp solar PV array on site (providing 19% of the sites power demand), should ensure compliance with SCDC Local Plan policy CC/3. However, the dDCO does not secure a minimum MWp for solar panels (as per Schedule 14, Part 22). Given that there would be no guaranteed solar panel provision if the Proposed Development were consented, does this change your stance regarding compliance with SCLP Policy CC/3?</p>	<p>The CHP engine(s) will produce green power in place of the solar power produced in the gas to grid option. With a CHP engine in place, the power produced will mean any solar contribution will not be needed, as it will provide enough power to supply the infrastructure demand and building power demand. Therefore, the renewable energy generated through the CHP option, even without solar would meet the requirement of reducing emissions of buildings on the site by more than 10%. On this basis, the Proposed Development will meet the requirement of SCLP Policy CC/3 to reduce carbon emissions by a minimum of 10%.</p>
6.8	Applicant	<p>Avoided carbon emissions</p> <p>What reassurances can you offer the ExA in terms of the reliability and efficacy of counting avoided emissions in order to inform the detailed CMP which would be secured through R21 of the dDCO [REP4-003]?</p>	<p>The Applicant provides reassurance on the reliability and efficacy of its approach to counting avoided emissions through the long-established process of reporting operational emissions through the Carbon Accounting Workbook (CAW) developed by UK Water Industry Research (UKWIR), which is utilised by all UK water companies, and is a regulatory submission requirement to submit to Ofwat each year.</p> <p>The UKWIR CAW, currently at version 17, is updated on a regular basis, typically annually, to update emissions factors in alignment to the Government's latest emissions factors for grid carbon intensity, transport mode carbon intensity, fuel carbon intensity (including natural gas). Therefore, through this process of reporting through the CAW each year, any decarbonisation of the gas grid or electricity grid carbon intensity will be represented in the avoided emissions values each year. If these drop below the carbon benefit required to continue to claim operational net zero status, than the Carbon Management Plan (CMP) as secured through Requirement 21 of the draft DCO (App Doc Ref 2.1) [REP4-003] would require additional offsets or carbon reductions to be delivered.</p>
6.9	Cadent Gas Limited	<p>Gas to grid capability</p> <p>Your response [REP1-125] to ExQ1.6.30 regarding the capability of the gas network to accept biogas generated by the Proposed Development states that you were considering the matter further and that a response would be provided at the next deadline (D2), which has not been received. Please provide a response to ExQ1.6.30 [PD-008] as requested.</p>	<p>No response from the Applicant.</p>
6.10	Applicant	<p>Whole Life Carbon Assessment</p> <p>ES Chapter 10 [REP4-026] reports a residual significant adverse effect during construction / decommissioning activities as per Table 5-1 (with 53,010 tCO₂e produced). With the use of the proposed CMP, ES Chapter 10 Table 5-1 reports a non-significant effect for the CHP option during operation. Please clarify how, with the use of the CMP, ES Chapter 10 Table 5-1 arrives at a nonsignificant effect for whole life carbon of the CHP option, when the CMP would not mitigate the significant effects reported for construction / decommissioning activities and as such, the emissions created during this period would not appear to be negated (notwithstanding that the carbon emissions for the construction of the CHP option are not currently presented with the ES)?</p>	<p>The significance conclusion has been updated in the version of ES Chapter 10 Carbon (App Doc Ref 5.2.10) provided at Deadline 5. With the use of the CMP, operational emissions will be mitigated, but over the lifetime there will still be residual emissions due to construction, considered to be a moderate adverse effect, which is significant.</p> <p>The Whole Life Carbon row of Table 5.1 of ES Chapter 10 Carbon (App Doc Ref 5.2.10) provided at Deadline 5 updated to read: <i>Depending on option: Significant. Preferred gas to grid option: Beneficial net effect. CHP Option: Significant, moderate adverse (only operational emissions are reduced to neutral effect, non-significant, through use of the CMP).</i></p> <p>The Applicant notes that IEMA Guidance 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' (2022) suggests that a project with negligible impacts would have emissions reductions 'through measures that go well beyond existing and emerging policy and design standards for projects of this type'. The modelling against the 6th Carbon Budget shows net emissions for the Preferred Option and the DCO model with CHP are below the decarbonisation trajectory. Therefore, despite the construction emissions not being mitigated to zero, the guidance could be interpreted to suggest that any mitigations that go beyond existing and emerging policy/design standards could be considered as negligible impact. The Applicant acknowledges</p>


ExQ1	Question to	Question	Response
			that not all mitigations have been delivered yet but the efforts so far, and those captured in the Design Code, would be considered going beyond existing and emerging design standards. Furthermore, as there is no formal guidance on how individual projects should test their alignment against Government targets on emissions reduction, the Applicant has taken a more conservative view with the conclusions presented in Table 5.1, by reporting capital carbon emissions as a moderate adverse (significant) effect.
6.11	Applicant	<p>Strategic Carbon Assessment [REP3-042] At ISH3 you confirmed that the indicative demolition carbon emissions presented for the existing WWTP in the Strategic Carbon Assessment [REP3-042] do not include the Waterbeach Water Recycling Centre (WRC). However, at D1 you committed to providing this information (see response to ExQ1 .6.38 [REP1-079]). Please can the indicative demolition carbon emissions be updated to include the WRC or further justification provided for this change in stance.</p>	<p>The Waterbeach WRC demolition is not within the scope of the Proposed Development and therefore not within the impact assessment, however, an indicative assessment has been completed that estimates the carbon impact of the demolition of the Waterbeach WRC would be approximately 200tCO₂e. This has been estimated based on the difference in scale of the area and structures within the existing Waterbeach WRC compared to those within the existing Cambridge WWTP.</p> <p>The Applicant's estimate of demolition emissions is now 4,065 tCO₂e (~6% of WWTP emissions and ~0.3% of total emissions for proposed development). The Strategic Carbon Assessment [REP3-042] has been updated (at page 8) so that the indicative demolition emissions now include the Waterbeach site. This is being submitted at Deadline 5.</p>
6.12	Applicant	<p>Benefits It is stated within the Planning Statement [REP1-049] (para 1.6.1) that an additional benefit of the Proposed Development is "significantly reduced carbon emissions compared to existing WWTP". However, Table 4.5 within ES Chapter 10 [REP4-026] confirms that the net carbon emissions for the operation of the proposed CHP option (1,110 tCO₂e/year) would be significantly higher than the operating emissions of the existing WWTP (640 tCO₂e/year). Please justify the stance taken in the Planning Statement.</p>	<p>The Applicant can clarify that paragraph 1.6.1 of the Planning Statement (App Doc Ref 7.5) [REP1-049] was in relation to the preferred biomethane option, and also the alternative CHP option with operational emissions mitigated through the outline CMP (App Doc Ref 5.4. 10.2) [REP4-064].</p>
6.13	Applicant	<p>CMP Would carbon emissions from sludge deliveries be monitored through the detailed CMP secured by R21 of the dDCO [REP4-003]? If not, please explain the reasons for this; or if so, would it be the case that if sludge deliveries were increased to the site, then carbon mitigation would need to be sought through the detailed CMP to ensure overall operational carbon neutrality, and should this be the case, how would this be achieved?</p>	<p>The Applicant considers that the CMP should not cover sludge deliveries. This is because its commitment is to an operationally net zero plant, not associated traffic movements. It should be noted, however, that no additional tanker movements will arise by virtue of the proposed development (these are merely displaced from the existing operations at Milton) and, in any event, the tanker fleet is scheduled for de-carbonisation over the coming decade.</p>

ExQ1	Question to	Question	Response
7.1	Applicant	<p>Public Rights of Way (PRoW) – diversion (85/6 and 85/8) Please provide a response to part c) of ExQ1.7.16 [PD-008].</p>	<p>The diversion would not be shorter for people coming from Horningsea. The Applicant intended for the text to indicate where people are likely travelling from. The text will be amended as follows:</p> <p><i>4.2.177 Users moving from the direction of Horningsea on of footpath 85/8 would also be affected when the use of 85/8 would cease due to the open cut construction of the treated effluent pipeline and would be temporarily diverted to use the footway on the western side of Horningsea Road and a temporary diversion parallel to the A14 to rejoin the 85/8, meaning users would need to travel 760m to return back to the 85/6. To mitigate this change in journey length, it is intended to install safety gates at locations where footpath 85/8 is intersected by the construction corridor to allow users to cross the corridor and continue to make use of the footpath.</i></p> <p>This has been updated in the ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) provided at Deadline 5.</p>
7.2	Applicant	<p>PRoW – diversion of 85/6 Fen Ditton Parish Council in its written representation (WR) [REP1-143] and CCoC in its response to ExQ1.7.23 [REP1-134] raise concerns around the length of the proposed diversion of footpath 85/6. Could any changes be made to reduce the length of the proposed diversion in response to these comments?</p>	<p>The diversion of PRoW 85/6 as indicated on sheet 2 of the Rights of Way Plans (App Doc Ref 4.6) has been set to represent a worse case and to account for the flexibility needed in relation to the construction compound layout, easement of the pipelines and construction haul road. The layout shown adopts an existing field boundary and a buffer from the indicated construction compound location to account for safety considerations. The Applicant will seek to minimise both the length and duration of the diversion, however for the purpose of assessment a worst case is assumed.</p>
7.3	Applicant	<p>PRoW – clarification regarding access (85/14 and 130/17) Please indicate your intention in respect of the capitalised text in your response to part b) of ExQ1.7.18 [REP1-079].</p>	<p>The capitalised wording at the end of the Applicants response to 7.18(b) was submitted in error and is an internal comment which should have been removed prior to submission.</p>
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. 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 full legal width and inspection of works. 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 essential mitigation and clarify which impacts the proposed bridleway would be mitigating?</p>	<p>The use of safety gates: The Applicant notes CCoC concerns regarding the use of safety gates however, the provision of the safety gates is a fundamental safety element of being able to retain the access along the PRoW's intersected by the Proposed Development. Without the safety gates the Applicant would be unable to retain access along the affected PRoWs which would lead to either temporary closure and severance (where alternative diversion routes are not possible) or lengthy diversions. Safety gates are a standard construction practice implemented by the Applicant.</p> <p>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: Table 7-1 (CTMP Forward Plan) of the CTMP (App Doc Ref 5.4.19.7) states that a detailed CTMP would be subject to approval of the relevant local highways authority (LHA) prior to construction commencement. This measure is secured through Requirement 9 of the dDCO (App Doc Ref 2.1) which requires a detailed CTMP to accord with the measures set out in the CTMP. The CoCP is not a discharging document and therefore would not be subject to approval by any relevant authorities. The CoCP informs the contents of Requirement 9 (Construction Environmental Management Plans) which as the Applicant notes above would be subject to LHA's approval. Therefore the Applicant agrees with CCoC's suggestion that the CTMP should be subject to LHA's approval and that it is already secured through the CTMP and draft Development Consent Order (App Doc Ref 2.1).</p> <p>The CTMP or CoCP Part A should provide for condition surveys of affected PRoW, restoration of the full legal width and inspection of works: Both the CTMP (Section 6.8) (App Doc Ref 5.4.19.7) and CoCP Part A (7.6) (App Doc Ref 5.4.2.1) state that 'pre and post construction surveys would be agreed with the local highways authority', the scope for PRoWs would be agreed as part of these discussions. The CoCP Part A, Para 7.6.19, states that 'All PRoWs will be restored to the same condition as before the works took place or to a standard which is acceptable to the Local</p>

ExQ1	Question to	Question	Response
			Highway Authority.' Therefore the Applicant agrees with CCoC's suggestion and the scope of the condition surveys will be agreed with the Local Highways Authority.
7.5	Applicant	<p>Site of proposed WWTP – proposed routes</p> <p>In your response to ExQ1.7.25 [REP1-079] it is noted that The Applicant intends to formalise how users are currently using the land required for the construction of the permanent access, proposed WWTP and area required for the landscape masterplan. In developing the landscape masterplan the Applicant has sought to understand how people use this location. However, in response to ExQ1.7.12 it is stated that The Applicant understands there to be no permitted recreational use or permissive or public rights of ways through the proposed WWTP site at present... It is the Applicant's understanding that the land is privately owned, and the public access is unauthorised. The Applicant notes that the current tenant farmer has taken steps to prevent unauthorised access to the land. This appears to be contradictory – please clarify.</p>	The Applicant does not believe the responses to be contradictory. The Applicant in both responses is acknowledging the current use of the land by the public regardless of its current status or permissions and how its proposals do not intend to prevent its continued use once the proposed WWTP has been constructed but instead proposes to secure its continued use through the provision of permissive paths and the new bridleway.
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>	No response from the Applicant.
7.7	Applicant	<p>Changes to amenity</p> <p>There is not a direct response to the question in ExQ1.7.32 [PD-008] which asks:</p> <p>Whilst significant effects have not been identified, have other magnitudes of impact been identified? If so, please indicate the location and magnitude of the impact(s). Similarly, the response to ExQ1.7.33 [PD-008] summarises only significant effects.</p> <p>Whilst the ExA understands that the ES methodology focuses on the threshold of significant effects it is interested in the Applicant's opinion as to whether there are any non-significant amenity effects (whether on their own or in combination) that may need to be mitigated. Please set out your opinion on this matter, including by reference to the properties listed in ExQ1.7.33 [PD-008].</p>	<p>The Applicant confirms that an assessment of amenity impacts below the threshold of significant effects does not form part of the assessment methodology as outlined in paragraph 2.2.5 (App Doc Ref 5.2.11) [REP4-028]. Therefore, the community assessment methodology does not capture other magnitudes of impact. Other magnitudes of impacts and non-significant (and significant) effects are reported in the individual assessments for other topics.</p> <p>The relevant other topics are: air quality, noise, landscape & visual, odour, traffic & transport. Therefore, the following ES chapters provide information on all the residential receptors that may experience a change / effect, and therefore could be a considered a contribution to changes in amenity acting on their own:</p> <ul style="list-style-type: none"> • ES Chapter 7 Air Quality (App Doc Ref 5.2.7) [APP-039] • ES Chapter 17 Noise and Vibration (App Doc Ref 5.2.17) [AS-036] • ES Chapter 15 Landscape and Visual Amenity (App Doc Ref 5.2.15) [REP4-032] • ES Chapter 18 Odour (App Doc Ref 5.2.18) [APP-050] • ES Chapter 19: Traffic and Transport (App Doc Ref 5.2.19) <p>The Applicant has been invited to provide an opinion on where non-significant amenity impacts could occur. In addition to the changes / effects set out in the individual topics listed above, typically changes in amenity are driven by construction activities, therefore, communities located in close proximity to construction activity are those that are most likely to perceive a change amenity. Considering the properties listed in ExQ1.7.33, the nearest construction activities are those associated with the construction of the new waste water transfer tunnel and construction of the Waterbeach pipelines. In the Applicant's opinion, these activities may lead to a perceived change in amenity for</p>

ExQ1	Question to	Question	Response
			<p>identified properties and their communities:</p> <ul style="list-style-type: none"> • The construction of the new waste water transfer tunnel – the nearest properties are those in Chesterton and Fen Ditton including Poplar Hall, Poplar Hall Farm, Red House Close and Northern Bridge Farm. • Construction of the Waterbeach pipelines – the nearest properties are those in Horningsea, Clayhithe and Waterbeach, including Mulberry House; ‘The Hamlet’ and ‘The Mead’ to the east of Clayhithe Road; the properties accessed from Hartridge’s Lane; the properties close to Bottisham Lock; the property to the south-east of the junction of Burgess’s Drove and Bannold Road; and properties accessed from Long Drove <p>A range of measures to mitigate impacts of construction activities are set out in the relevant chapters and the Code of Construction Practice (CoCP) Part A and B (App Doc Ref 5.4.2.1 & 5.4.2.2.) [REP4-040 and REP4-042]. In addition, the Community Liaison Plan (CLP) (App Doc Ref 7.8) [REP4-078] provides the opportunity for communities to contact the project team to identify any issues.</p> <p>As stated above, typically changes in amenity are driven by construction activities. In operation, amenity effects are not anticipated as the design incorporates mitigation to minimise those factors that contribute to changes in amenity.</p> <p>Mitigation measures for traffic on the local road network, lighting, odour and visual effects are set out in:</p> <ul style="list-style-type: none"> • Operational Logistics Traffic Plan (App Doc Ref 5.4.19.10) [REP4-072]; • Landscape, Ecological and Recreational Management Plan (App Doc Ref 5.4.8.14); and • Mitigation Tracker (App Doc Ref 5.4.2.6). <p>Mitigation measures to avoid / reduce / manage noise, landscape and visual, odour and traffic effects on receptors over the operation of the Proposed Development are set out in:</p> <ul style="list-style-type: none"> • ES Chapter 17 Noise and Vibration (App Doc Ref 5.2.17) [AS-036]; • ES Chapter 15 Landscape and Visual Amenity (App Doc Ref 5.2.15) [REP4-032]; • ES Chapter 18 Odour (App Doc Ref 5.2.18) [AS-104]; and • Chapter 19: Traffic and Transport (App Doc 5.2.19) <p>The Applicant will develop a written management system specific to the facility tailored to cover regulations and laws relevant to the facility as well as specific environmental permit conditions. In this way the management procedures and plans prepared for the facility will be developed so that the facility operates in compliance with relevant laws, regulations, environmental permit conditions and any corporate policy that apply to the facility. The written management system specific to the facility would be used in support of environmental permit applications and once operation commences the operator must implement the management system or they will be in breach of the permit.</p>

ExQ1	Question to	Question	Response
7.8	Applicant, CCC, SCDC	<p>Local employment and training opportunities</p> <p>To the Applicant: Whilst the ExA notes the Applicant's Comments on LIR (e.g. reference 12 on page 26) [REP2-036], a response to the following question in ExQ1.7.36 [PD-008] has not been provided: Would the Applicant be willing to enter into any formal commitment at this stage as to the inclusion of under-represented groups or people in need of training / apprenticeships / experience in the construction workforce? If so, please set out the nature of any such commitment. In respect of any formal commitment, please respond to the suggestions at 12.16 and 12.17 of CCC's LIR [REP2-043] and at 17.15 and 17.16 of SCDC's LIR [REP4-092] in relation to: local advertising of jobs; and opportunities for apprenticeship roles.</p> <p>To CCC and SCDC: SCDC's comment at point 17 of [REP3-060] (CCC has made the same comment) questions links with Wisbech College rather than other more local / sustainable institutions, such as the Cambridge Regional College. The Applicant has provided an explanation for this at [REP4-086]. Are you happy with these arrangements in light of this explanation?</p>	<p>The Applicant set out in its response to ExQ1.7.36 the commitment Anglian Water makes across its entire infrastructure programme to attracting candidates come from a wide range of backgrounds including military leavers, ex-offenders; students not successful on other programs and we work with DWP, Jobs 22 and local charities. The Applicant works across the entire region with educational bodies, charities and local government to promote these opportunities widely.</p> <p>The Code of Construction Practice Part A (App Doc Ref 5.4.2.1) has been updated to include a section on recruitment which sets out the Applicants commitment to local advertising and apprenticeships in line with the Applicants response to ExQ1 7.36. With regards to the staggered timeframes for recruitment advertising suggested by CCC and SCDC, although the Applicant is happy to agree to local advertisement platforms with CCC and SCDC, the Applicant believes exclusive, early local advertisement may have a negative impact on attracting local candidates many of which access recruitment opportunities through national recruitment channels.</p>
7.9	CCoC	<p>Equalities Impact Assessment (EqIA)</p> <p>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?</p>	No response from the Applicant.
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>	MWLP Policy 16 criterion (f) refers to land which is set aside for regular community use (such as open space facilities designed to attract recreational users, but excluding, for example, habitat creation). The primary purpose of the area surrounding the new water recycling centre is for landscape mitigation and habitat creation. It is not designed to attract recreational users or to be given any formal open space designation (which the Applicant understands is the focus of this criterion), but will provide a valuable additional recreational resource for people visiting the site or accessing the countryside around Cambridge, particularly via the improved bridleway and permissive path network delivered by the Proposed Development. The Applicant considers that this policy criterion is intended to provide protection in circumstances where public open space necessary to meet the recreational needs from principally housing development, ensuring that any such space is genuinely suitable for recreational purposes. The Applicant does to consider this part of Policy 16 applies to the Proposed Development or in any way diminishes the value of the recreational opportunity that is presented by the Proposed Development.

ExQ1	Question to	Question	Response
7.11	Applicant	<p>Effect of proposed outfall on PRoW</p> <p>SSH notes at 10.3.4 (page 96) of its WR [REP1-171] that The riverside path connecting the communities of Fen Ditton and Horningsea in the Baita Bite Conservation Area PRoW 85/6, 85/7 will be affected by a significant concrete structure at the outfall reducing the visual attractiveness, affecting the quality of the path since footfall will be concentrated into a narrow width passing the outfall, and reducing opportunities to experience wildlife and a natural riverbank.</p> <p>How would the width of the path be affected;</p> <p>What would be the width of the path once the outfall structure is in place; and</p> <p>How would this width compare with other parts of the riverside path?</p>	<p>Significant concrete structure at the outfall reducing the visual attractiveness</p> <p>The Design and Access Statement (App Doc Ref 7.6 [AS-168]) shows how the proposed outfall will look from the adjacent PRoW (FP 162/1) and how the existing Cambridge WWTP does look from adjacent PRoW (FP 85/6) demonstrating that the majority of the structure is not visible to NMU's when viewing from the opposite bank. When traversing FP 85/6 the areas of the structure visible to users would not be dissimilar (only the cap and manholes visible) to that in the below image (the existing Cambridge WWTP taken from Google Images) with the difference being that the top of the outfall structure will be covered with a layer of topsoil and seeded. The pipe protection shown on Sheet 3 of the design plans – outfall - outfall layout plan (App Doc Ref 4.13.3 [APP-027]) is a below ground structure so would not be visible.</p> <p>FP 85/7 is the PRoW that connects Horningsea Road to FP 85/6, the outfall structure will not be visible from this PRoW.</p>  <p>How would the width of the path be affected?</p> <p>The width of the footpath will not be impacted once the outfall structure is in place and in accordance with the Code of Construction Practice Part A (paragraph 7.6.19) (App Doc Ref 5.4.2.1) will be restored to the same condition as before the works took place or to a standard which is acceptable to the Local Highway Authority. As the ExA will note from the image provided above of the existing Cambridge WWTP outfall, the presence of the outfall does not impact upon or restrict the width of the PRoW or a users ability to cross over it.</p> <p>What would be the width of the path once the outfall structure is in place?</p> <p>Given that FP 85/6 is not a surfaced path with the route and width currently defined by surface erosion from users (often referred to as a desire path) and the only restrictions to routes taken being the riverbank to the west and ditch to</p>

ExQ1	Question to	Question	Response
			<p>the east, the Applicant feels it would be misleading to provide a 'path width'. The Applicant can however confirm that the current bank width would be reinstated and therefore walking conditions would match the existing situation.</p> <p>How would this width compare with other parts of the riverside path?</p> <p>The width of riverside paths is often dictated by the paths alignment with the river and factors such as private land boundaries, vegetation, adjacent waterbodies, whether the path is informal or surfaced, etc. and therefore widths can vary significantly. Guidance provided by Natural England states that minimum widths of 1.5m for footpaths and 3m for Bridleways. Localised examples of river path widths (based on visible surface erosion where formal surfacing is not present) are FP 162/1 is approximately 2.5m wide, FP 85/6 varies in width but is approximately 1m in width at the intersection with 85/7, approximately 2m at the location of the proposed outfall structure and approximately 2m at Green End, FP 130/13 is approximately 1.7m in width. Therefore, availability of 'path width' exceeds both local examples and guidance widths.</p>
7.12	Applicant	<p>Access to residential properties</p> <p>In [REP2-063] SHHG questions (point 7.9) a suggestion that access to Poplar Hall and Poplar Hall Farm would not be affected and also believes that access to Biggin Abbey and Biggin Abbey residences would be affected. Please clarify the position in relation to each of these properties.</p>	<p>In the Applicants response to ExQ1 7.9 the Applicant states that the access would not be significantly effected, it is acknowledge in the Environmental Impact Assessment that effects could occur but with the implementation of mitigation and the maintenance of access to Poplar Hall and Poplar Hall Farm the effect would not be significant. The position on this is access is that in order to form construction access CA2 (as shown on Sheet 3 of the Access and TRO Plans (App Doc Ref 4.7 [AS-154])), a small team of mobile plant and personnel would need access the first approx. 100m of the track to Poplar Hall and Poplar Farm via construction access COA2. Once CA2 is formed the construction access would be via CA2 only, with construction vehicles only using COA2 at the end of the relevant construction phase to reinstate the land. COA2 access to Poplar Hall and Poplar Hall Farm would then only be used for operational access to the outfall structure.</p> <p>Access to Biggin Abbey and the Biggin Abbey residences would not be affected as Biggin Lane is not part of the construction route and is not a construction access. The construction access and construction traffic would be via CA8 (as shown on Sheet 3 of the Access and TRO Plans (App Doc Ref 4.7 [AS-154])) this access would be formed directly off Horningsea Road with no need to gain access via Biggin Lane.</p>
7.13	Applicant	<p>Permissive paths</p> <p>In [REP2-063] SHHG states (point 7.24) that It is clearly not acceptable for the permissive access to only be committed to for a period of 30 years. Why is the proposed permissive access proposed for 30 years and not for the lifetime of the development?</p>	<p>The duration of the permissive path agreement was the subject of negotiation with the landowner, noting that most agreements of this type are for significantly shorter durations. 30 years was considered to be an appropriate compromise likely to yield a commercial agreement and aligned with the delivery and maintenance requirements for BNG over 30 years secured in the LERMP.</p> <p>Subsequently, as discussed in the response to question 10.2, it has not been possible to progress a permissive arrangement to the satisfaction of all relevant parties (include Cambridgeshire County Council as relevant PROW authority). Therefore, the Applicant is confirming that the default position in the draft Development Consent Order of a permanent public bridleway is to be taken forward.</p>
7.14	Applicant, Save Honey Hill Group (SHHG), SCDC	<p>Recreational pressure / parking</p> <p>In [REP2-063] SHHG states (point 7.25c) that This answer is illogical. The reality is that the applicant is creating c70 ha of open access woodland and grassland with paths close to the edge of Cambridge replacing an area of open arable land. It is clearly the case that this will be a popular destination for walking and other recreational pursuits and significant numbers of users will come by car. The Applicant appears not to be committing to making appropriate physical provision on its land in the even that, for example, nuisance parking or damage starts to occur.</p>	<p>a) The Applicant considers that the provision of car parking for walkers would encourage people to come to the area by car and increase the risk of 'nuisance parking'. For this reason, it proposes only to provide parking for operational staff and visitors to the WWTP. The Applicant recognises that there is an existing area of hardstanding adjacent to Low Fen Drove Way which is used occasionally by walkers and the Proposed development retains this area for informal parking use. The Applicant envisages that the primary users of the area surrounding the new water recycling centre and the improved bridleway and permissive path network delivered by the Proposed Development will be walkers, cyclists and equestrian users and they will access this area using the existing PROW network. It is not the desire of the Applicant to encourage additional vehicular trips to the site by providing car parking specifically for these purposes.</p> <p>b) The Applicant does not believe that the Proposed Development will become a destination for walking and other</p>

ExQ1	Question to	Question	Response
		<p>a) Please set out your view on whether the provision of car parking for walkers would encourage people to come to the area by car and increase the risk of 'nuisance parking';</p> <p>b) The Applicant is proposing a section 106 agreement [REP3-044] in relation to vehicle car parking. Please provide your comments on this, including whether and why you consider that the proposed measures would be successful or not; and</p> <p>c) If additional walkers are attracted by new / enhanced walking opportunities created by the Applicant, provide your view as to whether impacts such as 'nuisance parking' and damage should weigh negatively in the overall planning balance? If not, why not?</p>	<p>recreational pursuits in its own right therefore generating significant numbers of users arriving by car and parking within and around the WWTP site. However, if nuisance parking were to become apparent, the proposed section 106 agreement provides a mechanism by which the local highway authority could recover costs from the Applicant to put in place any appropriate traffic regulation order.</p> <p>c) This risk is considered by the Applicant to be very low and the harm arising (given the mitigation provided by the offered section 106 agreement) is significantly outweighed by the benefits to increased connectivity, recreation and health which result from the Proposed Development.</p>

ExQ1	Question to	Question	Response
8.1	Applicant	<p>CA Schedule The Starkie Family are identified in the CA Schedule as having Part 2 (Category 3) interests only. However, the BoR indicates this AP has Part 1 (owner) interests in Plot 048a. Please address this (this was also identified as an Action Point but does not appear to have been addressed).</p>	<p>Hearing Action Point 10 [EV-006h] was: "Review possible additional statutory undertaker interests raised by Margaret Starkie at / in the vicinity of Riverside Cottages. As the Applicant states in its responses to the ExA's Hearing Actions (App Doc Ref 8.20 [REP4-087], it has carried out the action."</p> <p>The ExA correctly points out that the Starkie family is identified in the BoR [REP4-011] as having an interest in parcel 048a. As explained during CAH1 (see paragraph 1.5.1 of the Applicant's Post Hearing Submission (CAH1 & ISH3) (App Doc Ref 8.21) [REP4-088], the Applicant believes the Starkie Family has an assumed interest in the subsoil of parcel 048a (which comprises part width of a highway). As stated during CAH1 (see paragraph 1.5.1 of the Applicant's Post Hearing Submission (CAH1 & ISH3) (App Doc Ref 8.21) [REP4-088], the Applicant does not intend to acquire an interest in this parcel, which is why it is shown coloured Yellow on Sheet 9 of the Land Plans (App Doc Ref 4.4) [REP1-016] as Interference with Private Rights Only. The Applicant has amended the relevant entry in the CA Schedule, which has been submitted at D5, to show the Starkie Family's possible interest in parcel 048a.</p>
8.2	Applicant	<p>Book of Reference The names 'Ian Harvey', 'Jenny Langley' and 'Robert King' are identified at Category 3 persons in the CA Schedule. However, these specific names do not appear in Part 2 of the BoR. Please clarify (this was also identified as an Action Point but does not appear to have been addressed).</p>	<p>In summary the apparent discrepancies have arisen due to slight differences in the names obtained during diligent enquiries to compile the Book of Reference and the names in which Relevant Representations were submitted by these Category 3 persons. The Applicant has the following detailed comments in relation to the three individuals listed by the ExA in this question.</p> <p>A Relevant Representation has been received from Ian Harvey. The Applicant had identified Ian Harvey Shingler as the registered owner of title CB144753 and noted the interest in the relevant part of the Book of Reference on page 306 submitted at D4 (App Doc Ref 3.3) [REP4-011]. The Applicant is unable to definitively verify if Ian Harvey and Ian Harvey Shingler are the same person but given the similarities we have assumed that they are the same person and have therefore updated the name on the CA schedule to Ian Harvey Shingler. We have written to Ian Harvey Shingler to request confirmation that they are the same person and are awaiting a response.</p> <p>A Relevant Representation has been received from Jenny Langley. An entry for Jenny Langley is shown on page 367 of the BoR submitted at D4 (App Doc Ref 3.3) [REP4-011] as Mrs Langley. The entry on page 367 of the BoR submitted at D5 (App Doc Ref 3.3) has been amended to include the Interested Party's full name of Doreen Jennifer Langley, which was not supplied when the Applicant carried out its diligent enquiry for this property which is not registered at the Land Registry.</p> <p>A Relevant Representation has been received from Robert King. The Applicant had identified Kevin Robert King as the registered owner of title CB88717 and noted the interest in the relevant part of the Book of Reference on page 338 submitted at D4 (App Doc Ref 3.3) [REP4-011]. The Applicant is unable to definitively verify if Robert King and Kevin Robert King are the same person but given the similarities we have assumed that they are the same person and have therefore updated the name on the CA schedule to Kevin Robert King. We have written to Kevin Robert King to request confirmation that they are the same person and are awaiting a response.</p>
8.3	Applicant	<p>Statutory Undertakers Progress Schedule The Statutory Undertakers Progress Schedule [REP4-017] notes that whilst the 'Local Highways Authority' owns land, s127 of PA2008 would not be engaged given that the owned plots would be subject to interference with private rights only. However, the same is said for, for example, UK Eastern Power Networks PLC, albeit in this case, the Applicant identifies that s127 would be engaged. Please explain the reason for this (this was asked by the ExA at CAH1, but further</p>	<p>The Applicant has noticed that the entry for UK Eastern Power Networks Plc in the Statutory Undertakers Progress Schedule [REP4-017] identifies, in column 6, that the two parcels they own are subject to potential interference with private rights only. This is an error because whilst Parcels 013f and 013g, which are assumed to be owned by UKPN/Eastern Power Networks, comprises 'yellow land' and is not therefore subject to powers of compulsory acquisition, Eastern Power Networks is the registered owner of Plot 014a, over which new rights are proposed to be compulsorily acquired pursuant to Article 28 (Access rights – Brown land). Section 127(6) of the PA 2008 is, therefore, engaged in relation to Parcel 014a because new rights are proposed to be acquired over land belonging to a statutory undertaker, but section 127 is not engaged in relation to Parcels 013f and 013g because these plots are not subject to</p>

ExQ1	Question to	Question	Response
		justification would be welcomed).	<p>compulsory acquisition (consistent with the position in respect of the local highways authority).</p> <p>The Applicant has updated the entry in the Statutory Undertakers Progress Schedule to correct this point and maintain consistency with the Compulsory Acquisition Schedule, both of which have been submitted at Deadline 5.</p>
8.4	Applicant	<p>Access Please address D4 submission [REP4-103] and the concerns raised around access to allotments.</p>	<p>The Applicant will respond to this question in its response to representations made at D4. See 8.23 Applicant's comments on Deadline 4 submissions.</p> <p>For the avoidance of doubt the Applicant is not seeking any compulsory or temporary powers over any land comprising allotments.</p>
8.5	National Highways	<p>Powers sought Please comment on the Applicant's response to CAH1 Action Points 16 and 17 [REP4-087] relating to CA powers sought and clarify why you consider that the powers sought would cause serious detriment to your undertaking, as mentioned in your D4 submission [REP4-096] (noting that you highlight that negotiations are progressing regarding protective provisions / side agreements and noting that that the Applicant has highlighted examples of made DCOs which it states include powers similar to that sought in this instance).</p>	<p>The Applicant has responded separately to the representations made by National Highways at D4. See 8.23 Applicant's comments on Deadline 4 submissions.</p>
8.6	Applicant	<p>CA Schedule The CA Schedule [REP4-015] notes that it includes all Category 1 landowners, whether or not they have made a representation. Please clarify why, for example, Ambury Developments Limited are not included given that the BoR [REP4-011] shows it as the landowner of some 002 and 004 plots.</p>	<p>Ambury Developments Limited (Company Number 04173903) is a wholly owned subsidiary within the Applicant's group of companies (see paragraph 3.1.4 of the Funding Statement (App Doc Ref 3.2) [REP4-009] and paragraph 5.3.7 of the Statement of Reasons (App Doc Ref 3.1) [REP1-009]. As a result, the Applicant expects the land rights to be dealt with as an inter-group transaction within the Applicant's group of companies. As a result, the Applicant felt it was not necessary to include Ambury Developments Limited on the Compulsory Acquisition Schedule. For completeness the Applicant has now included this party on the CA Schedule. This can be seen on the Compulsory Acquisition Schedule submitted at Deadline 5.</p> <p>In reviewing the Compulsory Acquisition Schedule against the Book of Reference the Applicant has identified a number of other Category 1 interests who were not included on the Compulsory Acquisition schedule. These parties consist of Metropolitan Housing Trust Limited, who is a Category 1 Landowner of a registered title, and a number of other parties who all have an assumed subsoil interest who have not been included in the Compulsory Acquisition Schedule, these are as follows: Andrew David Neely and Anna-Liese Neely; Anne Felvus and Michael John Felvus; Benjamin Sanders; H Sanders & Sons; Jonathan Sanders; Kier Petherick trading as Fields 71 - 72 Limited; Mr Malcolm John Wheeler; Peter John Everitt (Deceased) and Shirley Rose Everitt; Sara Sanders; Shaun Christopher Downey and Joanne Pauline Downey; The Personal Representatives of Brian Harold Sanders Dec'd and Vincent Kenneth Lemon. These have now been included in the Compulsory Acquisition Schedule submitted at Deadline 5.</p>
8.7	Applicant	<p>Statutory Undertakers Please clarify (for the purposes of the most recent CA Schedule, Statutory Undertakers Schedule, Protective Provisions in the dDCO, SoCG and PADS) whether it is UK Power Networks Ltd or Eastern Power Networks PLC you are negotiating with, as the name of the organisation and details provided around negotiations appears to be inconsistent within and between these documents.</p>	<p>There is not an inconsistency, they are two entities with different roles to the same land parcels.</p> <p>UK Power Networks Limited (UKPN) is the electricity Distribution Network Operator (DNO) for the area within which the Order Limits are located. As such, the Applicant has been negotiating with UKPN in relation to the dDCO, Protective Provisions, SoCG and PADS, in its capacity as the DNO.</p> <p>The Applicant requires a Permanent Access Right across parcel 014a which can be found on Sheet 2 of the Land Plans (App Doc Ref 4.4) [REP1-016]. Eastern Power Networks PLC (EPN) is the party with the Category 1 land interest which is registered at the Land Registry as being the freehold owner of parcel 014a. EPN is therefore the entity with the legal</p>

ExQ1	Question to	Question	Response
			<p>capacity to grant those rights with whom the Applicant has been in negotiation.</p> <p>The distinction between these two entities has been clarified in the entries in relevant documents submitted at Deadline 5.</p>
8.8	National Highways, Conservators of the River Cam, Network Rail Infrastructure Limited, EA, CCoC, Arqiva Limited, Sky Telecommunications Services Limited, City Fibre Limited, Vodafone, Eastern Power Networks PLC/UK Power Networks, any other relevant Statutory Undertakers	<p>Statutory Undertakers</p> <p>Please review the Applicant's D4 submissions and identify any outstanding key concerns or impediments with regard to reaching agreement with the 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?</p>	No response from the Applicant.
8.9	P.X. Farms Limited	<p>Negotiations</p> <p>Please confirm whether you are satisfied with the Applicant's response to your RR [RR-032] on page 338 of [REP1-078] and set out any outstanding concerns regarding any ongoing negotiations around CA / TP matters?</p>	No response from the Applicant.
8.10	Elizabeth Cotton, Gonville and Caius College	<p>Specific plots</p> <p>[REP4-101] notes that in respect of field next to the proposed outfall (understood by the ExA to be referring to Plot 021b), the use of subsidies can have a financial benefit. Please clarify whether subsidies are currently received in respect of this land?</p>	Whilst this question is not directed at the Applicant, the Applicant confirms that loss of subsidies by a landowner or occupier is a matter which is capable of being taken into account when assessing any claim for compensation arising from the use of compulsory acquisition powers.
8.11	Gonville and Caius College	<p>Specific plots</p> <p>The Applicant confirmed at CAH1 and in its response to hearing Action Points [REP4-087] (page 5) that there would be no permanent air vent structures on your land. It has also committed to restoring land associated with temporary shafts (Plots 021s and 021r) so that an agricultural use would resume after any construction period, albeit that permanent land acquisition is still sought over these plots given implications for elements of the shafts remaining in situ a number of metres below ground level. Please confirm whether you are satisfied with these arrangements, and if not, the reasons for this.</p>	No response from the Applicant.
8.12	Waterbeach Development Company Limited	<p>Negotiations</p> <p>Please provide an update regarding any key outstanding concerns you have relating to the Proposed Development and your land / development interests, and provide an indication as to whether or not you envisage that agreement on all matters will be reached with the Applicant during the course of the Examination (noting that the</p>	No response from the Applicant.

ExQ1	Question to	Question	Response
		Applicant states on page 6 of its hearing Action Point response [REP4-087] that it does not foresee an issue with the overlapping of activities of both projects).	
8.13	Applicant, CCC, SCDC	<p>Funding Please provide an update regarding how the identified shortfall in funding for the proposed WWTP would be met, and if not yet determined, the likelihood of this happening before the close of the Examination.</p>	<p>The Applicant remains in close dialogue with the relevant partners, Homes England and the City Council. Homes England's evidence at ISH2 reinforced their commitment to project. The Applicant, and its partners, remain confident that they can meet the full quantum of any increased costs through the mechanisms explained at CA1.</p> <p>The Applicant expects to be in a position to provide a substantive update before the Examination closes and will comprise a joint statement endorsed by the Applicant, the councils and Homes England, and the Funding Statement will be updated at the same time. We anticipate we will be able to submit this by Deadline 6, 2 April.</p>
8.14	Applicant	<p>Funding Does the Funding Statement [REP4-019] provide a cost estimate for the Waterbeach pipeline element of the Proposed Development. If not, why not?</p>	<p>The Funding Statement [REP4-009] does not provide a standalone estimate for the part of the project required to fund the Waterbeach pipeline or the additional treatment capacity required arising from growth at Waterbeach New Town.</p> <p>As stated in the Applicant's Funding Statement, [Document Reference 3.2, REP4-009], the cost and construction of the pipeline for diverting the Waterbeach flows and the additional treatment capacity required to treat Waterbeach New Town flows, will be met as part of the Applicant's 'business-as-usual' regulatory funding cycle. As typical for the Applicant's regulated capital programme, funding for Waterbeach is provided via the Final Determination process. The Applicant, as a responsible acquiring authority, is fully confident that this can be delivered within the expected funding allocation.</p> <p>The funding available for the Waterbeach pipeline element of the Proposed Development is £16m. This is entirely separate to funding for the Proposed Development because in the event that the Proposed Development was not consented, the pipeline would still be required to transfer flows from Waterbeach to the existing WWTP. £16m funding covers both scenarios. Just to be clear this is in addition to £22.5m funding for the additional treatment capacity required for Waterbeach New Town.</p> <p>As stated in the Applicant's Funding Statement, the estimated costs of acquiring land rights for the Waterbeach Pipeline are included within the c. £5 million estimate and will be met by the Applicant from the regulatory funding mechanism. These will be applied by the Applicant from its allocation from Ofwat as part of the regulatory AMP process which is explained above.</p> <p>As to providing a cost estimate, the Applicant is fully confident that the pipeline to transfer flows from Waterbeach and the additional treatment capacity arising from growth at Waterbeach New Town can be delivered within the £22.5m & £16m funding allocation. Costs will be further refined through a detailed design process in the delivery phase of the project.</p> <p>All of these sums have been taken into account in the total estimated costs and funding available and the Applicant will update the relevant references in the Funding Statement submitted at Deadline 5.</p>

ExQ1	Question to	Question	Response
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.	
9.2	Applicant	Design Code Design Principle 8 in the Design Code [REP4-085] is different to that of Design Principle 8 in the Design and Access Statement (DAS) [AS-168]. Please clarify: a) the reason for this, noting that collaboration and engagement can be helpful to achieving good design and that section 2.5 of the Design Code appears to be supportive of further design review as necessary; and b) whether Design Principle 8 in the Design Code relates to all plant equipment (including that associated with the proposed WWTP, which might include, for example, digestors) or to plant equipment associated with specific buildings only, as it is unclear to the ExA as currently written.	The Applicant has now amended Design Principle 8 within the Design Code to reflect that of the DAS Design Principle 8; the updated Design Code is being submitted at Deadline 5. It is the Applicant's intent to use a Design Panel in a timely manner to review the appropriate points of design to that phase in which that design relates to.
9.3	Applicant	Design Code Design Code para 2.5.1 makes reference to the 'Project's Design Champion' and to where this role is 'described within the DAS'. Please either: a) signpost to where the role of 'Design Champion' is described within the DAS; or if it is not described within the DAS, provide a greater level of detail of this role, including any relevant design experience, qualifications and any other relevant attributes the person taking on this role would / should possess.	The Applicant acknowledges this paragraph is not accurate regarding the reference to the DAS and has amended the Design Code to reflect the historical use of the Design Champion; the updated Design Code is being submitted at Deadline 5. However, for consistency and to also reflect the response to ExA Q1 9.4 the Applicant used a Design Champion as recommended by the Design Council to support and influence the project's design. The Design Council recommended that that the Design Champion was of a senior director level within the Applicant's organisation that could help guide the decision process not purely on a cost basis but to take into account 'good design' principles and endorse or otherwise the recommendations of the Design Council and to give the Applicant's design team clear direction. The Applicant has had a Design Champion during the design phase of the project in Mr Jason Tucker. Mr Tucker is Anglian Water's Director of Strategic Delivery and Commercial Assurance and a member of the company's Management Board. He is also the Chairman of the Infrastructure Client Group. Mr Tucker has a technical background in civil engineering and considerable experience in delivering major capital investment projects and programmes, as well as being involved in industry-wide networks regarding large and nationally significant infrastructure projects. Therefore he brought both technical experience and senior management representation to act as the Design Champion. Mr Tucker is also on the Construction Leadership Council Advisory Board. Mr Tucker will continue this role throughout the design and delivery of the project.
9.4	Applicant	Design Code Please check the Design Code [REP4-085] for formatting / typographical errors, including: section 3.5 (and contents page) regarding the term 'Gateway Design Buildings'; whether paras 2.2.7 to 2.2.9 should be bullet points rather than paragraphs; and whether the design codes should be a mix of italics / not italics.	The Applicant has corrected the formatting and typographical errors and an updated version of the Design Code is being submitted at Deadline 5.

ExQ2	Question to	Question	Response
10.1	Applicant	General Please remove reference to 'single appointed person' on pages 4 and 5.	The Applicant has made this change and it can be seen in the draft Development Consent Order (Application Reference 2.1) (Revision 8) submitted at Deadline 5.
10.2	Applicant	Articles Article 6 – this refers to limits of deviation as shown on the Works Plans. However, the Works Plans [AS-150] 'General Notes' No. 3 (above the legend) refers to 'Works Areas' – it is unclear where this term is defined and thus unclear where the boundaries of the limits of deviation would be. Please clarify or amend the article or Works Plans as appropriate.	'Work Areas' is not defined. The limits of deviation are the full extent of the coloured area of each Work No. save as permitted by Article 6 as explained at note 3 above the legend to the Works Plans (Application Reference 4.3). For clarity, the Applicant has amended the legend on the Works Plans and updated plans are submitted at Deadline 5 (Revision 4) to state the following: <i>The limits of deviation are the full extent of the areas within the works numbers shown save as permitted by Article 6 of the draft Development Consent Order.</i>
10.3	Applicant	Articles Article 44(2) – this should refer to the 'Land Plans' rather than the 'Works Plans'.	This is agreed. The Applicant has made this change and it can be seen in the draft Development Consent Order (Application Reference 2.1) (Revision 8) submitted at Deadline 5.
10.4	Applicant	Requirements (R) R1 'enabling works' (in Schedule 2, Part 1) refers to paras 3.1.7 and 3.3.1 of ES Chapter 2. Does this need amending to reflect changes to ES Chapter 2 submitted at D4 [REP4-022]?	The Applicant has changed '3.1.7' to '3.1.6' and has changed '3.3.1' to '3.4.1' in the definition of 'enabling works' to reflect the Project Description (Application Reference 5.2.2) submitted at Deadline 4. This can be seen in the draft Development Consent Order (Application Reference 2.1) (Revision 8) submitted at Deadline 5.
10.5	Applicant	Requirements R7(2) – a) should this make provision for the updated odour assessment to be submitted to and approved by the relevant planning authority; b) should 'C98 OUE/m3' be defined; and c) should the 'odour impact assessment' be defined?	a) The Applicant does not consider that the updated odour assessment needs to be submitted <u>and</u> approved as the update is confined to one specific point and that is demonstrating that odour concentrations at all sensitive receptors shown on Figure 4.5 in the odour impact assessment (document number 5.4.18.2) will be less than 1.5 C98 OUE/m3. The Applicant considers it sufficient that the update addresses this and is provided for confirmation. b) The Applicant does not consider that this needs defining as it is a reference to a figure in the odour impact assessment. However, the Applicant has amended the wording for clarity as follows: <i>(2) No phase incorporating Work Nos. 4 and 8 is to commence until details of the odour control unit locations and an updated odour assessment have been submitted demonstrating that odour concentrations at all sensitive receptors shown on Figure 4.5 in the odour impact assessment (document number 5.4.18.2) will be less than 1.5 of <u>the modelled predicted odour exposure levels of C98 OUE/m3</u> .</i> c) The Applicant is content to add a definition of 'odour impact assessment' and this can be seen in the draft Development Consent Order (Application Reference 2.1) (Revision 7) submitted at Deadline 5.
10.6	Applicant	Requirements R10(1) – Conservators of the River Cam has requested to be added as a consultee on this requirement. Please address this matter.	The Applicant has not added the Conservators as a consultee as it considers consultation a matter for the relevant planning authority to determine, rather than a matter to be prescribed through the Requirements. Although the Applicant has provided for the relevant planning authority to consult with Natural England and the Environment Agency, these bodies do not have the protection of protective provisions in Schedule 15 to the draft Development Consent Order whereas the Conservators do have the benefit of such provisions in its capacity as the 'relevant navigation authority'. The Applicant has amended the protective provisions for the benefit of the relevant navigation authority to increase the details which are to be approved by the Conservators in its capacity as relevant navigation authority which the Applicant considers to be more appropriate than amending the Requirement. These changes can be seen in the draft Development Consent Order (Application Reference 2.1) (Revision 8) submitted at Deadline 5.
10.7	Applicant	Requirements R12(3) – should this refer to the detailed operational workers travel plan and should the word 'following' be replaced with 'upon' for clarity and	The Applicant has made the change to Requirement 12(3) to include the word 'detailed' and this can be seen in the draft Development Consent Order (Application Reference 2.1) (Revision 8) submitted at Deadline 5. The Applicant is also content

ExQ2	Question to	Question	Response
		consistency purposes.	to change 'following' to 'upon' as this has the same effect and will be consistent with the wording used in Requirement 10, therefore the Applicant has also made this change.
10.8	Applicant	<p>Schedules Schedule 1 - should any Work Nos. make provision for gas / electrical connections other than Work No. 9 (noting for example that the Design Plans – proposed WWTP [REP1-019] identifies green arrows showing connections outside Work No.9)?</p>	<p>Work No. 9 allows for the provision of the Applicant's works of the installation of gas to grid or combined heat and power. Gas and electrical connections outside of this are not dealt with in draft Development Consent Order as such connections will be made by the statutory undertakers using their permitted development rights.</p> <p>The green arrows indicated on the Design Plans are indicative routes where connections might be made. The only necessary connections between Works in the Order are between Work Nos. 8 and 9 and which are dealt with in the relevant descriptions of these Work Nos. in Schedule 1 of the draft Development Consent Order (Application Reference 2.1).</p>
10.9	Applicant	<p>Schedules Please respond to CCoC's comment at the bottom of page 8 of [REP2-040] regarding Schedule 3 and identification of public highways. Please also clarify whether CCoC's request has effectively already been addressed in Schedule 3 given that some 'streets' are identified as private, and that, on this basis, those which are not identified this way are public?</p>	<p>With regards to CCoC's comment regarding identification of public highways, the Applicant responded to this at Deadline 4. Please see paragraph 2.6.9 of Applicant's Comments on Deadline 3 Submissions (Application Reference 8.19 [REP4-086]). There are entries which refer to a private track but these were added for clarity and the ExA is correct that, at this stage, streets not identified as private are streets which are public.</p>
10.10	Applicant	<p>Schedules Schedule 14, Part 1 'Terminal pumping station' – does this need amending noting that Work No. 16 was amended in the dDCO at D3 to remove reference to an odour control unit and exhaust stack?</p>	<p>The odour control does not sit within the Terminal Pumping Station (Work No. 16) and therefore Schedule 14, Part 1 draft Development Consent Order (Application Reference 2.1) (Revision 8), submitted at Deadline 5, has been amended to remove all references to the odour control unit within Schedule 14, Part 1. The odour control unit functionally serves the Terminal Pumping Station, however. Please see the relevant extract from the Project Description (Application Reference 5.2.2) below which addresses this:</p> <p>2.3.6 <i>Air venting from the TPS will be routed through an Odour Control System/Unit...which will be located next to the inlet works odour control system/unit in that works area (Works No.4).</i></p> <p>2.3.18 <i>The Inlet Screens as well as the channels they are in, along with the TPS, will be enclosed/covered and the air extracted to an Odour Control Unit, serving the TPS and inlet works, to mitigate odour impacts. The Inlet Works is also designed to be as linear as possible to reduce turbulence and therefore minimise odour release at source. Both the TPS and the Inlet Works odour control units are located in the Inlet Works works area (Works No. 4). The TPS odour control unit is located in this location and piped to it from the TPS to reduce the odour impact of this specific odour control unit.</i></p>
10.11	Applicant	<p>Schedules Schedule 14, Part 3 – Please clarify: which elements the 'height', 'depth' and 'foundations' in rows 5, 6 and 7 relate to; and whether the number of 'screening handling unit', 'odour control unit' and 'odour control unit exhaust stack' accurately reflect the number of these elements specified in Schedule 1, Work No. 4?</p>	<p><u>Height, depth and foundations in rows 5, 6 and 7</u> This relates to the height, depth and foundations of the Inlet Works (Work No. 4). The Applicant has clarified this by amending Schedule 14, Part 3, as follows: 'Depth' to 'Inlet works – Depth' 'Height' to 'Inlet works – Height' 'Foundations' to 'Inlet works – Foundations'</p> <p><u>Screening handling plant</u> There will be two screenings handlings plant forming part of the inlet works, as set out in Schedule 14, Part 3 and therefore the Applicant has amended Work No. 4 in Schedule 1 to reflect this: (a) <u>two</u> screenings handling plants;</p> <p><u>Odour control unit</u></p>

ExQ2	Question to	Question	Response
			<p>The Applicant has amended Schedule 14, Part 3 to include the following as a parameter: <i>'Number of odour control units' '2 No'</i></p> <p><u>Odour control unit exhaust stack</u> There will be two odour control unit exhaust stacks in the Inlet Works and the Applicant has amended Schedule 14, Part 3 to include the following as a parameter: <i>'Number of odour control unit exhaust stacks' '2 No'</i></p> <p>All changes can be seen in the draft Development Consent Order (Application Reference 2.1). (Revision 8) submitted at Deadline 5.</p>
10.12	Applicant	<p>Schedules Schedule 14, Part 10 – which Work No. do the proposed 25m high 'vent stacks' relate to and is the naming of these consistent with the relevant Work No. information in Schedule 1?</p>	<p>The reference to 25m high vent stacks in ExQ2 10.12 is not accurate. The vent stacks 15m high but 25m AOD. The terms vent stacks and exhaust stacks are used interchangeably to refer to the same piece of infrastructure and are referred to as such in the Project Description (Application Reference 5.2.2).</p> <p>The vent stacks relate to the odour control units in Work No. 8, specifically: (e) two odour control units and exhaust stacks;</p> <p>For consistency with Schedule 14, Part 10, the Applicant has amended Work No. 8 as follows: (e) two odour control units and vent exhaust stacks;</p> <p>For further clarity, the Applicant has also taken the opportunity to make additional amendments to Part 10. This is because the 'sludge treatment centre control unit 1' and 'unit 2' form part of Work No. 8 and the Sludge Treatment Centre, specifically the two odour controls units in (e) as referred to above. The Applicant has changed reference from 'sludge treatment centre control unit' to 'sludge treatment centre <u>odour</u> control unit' at Schedule 14, Part 10 to make clear that the reference to the control units is to the odour control units.</p> <p>These changes can be seen in the draft Development Consent Order (Application Reference 2.1). (Revision 8) submitted at Deadline 5.</p>
10.13	Applicant	<p>Schedules Do the Design Plans – proposed WWTP [REP1-019] accurately reflect Schedule 14 parameters (e.g. Schedule 14, Part 11 indicates a digester height of 30.4m, whereas the Design Plans indicate a height of 29.06m)? If not, does this have any implications for ES assessments, such as landscape and visual and associated photomontages?</p>	<p>The Applicant notes that the Design Plans are indicative, save where secured by Article 6, and are not parameter plans. The assessment in the ES is based upon the parameters and therefore there are no implications for the outcomes of the assessments.</p> <p>With regards to the specific example of Schedule 14, Part 11, the Applicant confirms Part 11 is correct. The Design Plans have been amended to accurately reflect the digester height as per the draft Development Consent Order (Application Reference 2.1). This can be seen in the Design Plans (Application Reference 4.9.2 and 4.9.3) submitted at Deadline 5.</p>
10.14	CCoC	<p>Schedules Please confirm you are satisfied with Schedule 17(4) and the disapplication of the Community Infrastructure Levy Regulations 2010.</p>	<p>No response from the Applicant.</p>
10.15	Applicant	<p>Schedules In Schedule 18 relating to the 'Construction traffic management plan', add a space between 'January 2024' and 'Revision 05'.</p>	<p>The Applicant has made this change and it can be seen in the draft Development Consent Order (Application Reference 2.1) (Revision 8) submitted at Deadline 5.</p>
10.16	Applicant	<p>Schedules</p>	<p>Schedule 18 is kept under constant review and the Applicant has checked the ES specifically and any amendments have been</p>

ExQ2	Question to	Question	Response
		Schedule 18 – please review ‘The environmental statement’ section and clarify whether the information and document numbers adequately include the whole of the ES.	reflected. The latest version of the draft Development Consent Order (Application Reference 2.1) (Revision 8) submitted at Deadline 5 reflects further changes.
10.17	Applicant	<p>Plans Please clarify whether the position of elements shown on the Design Plans – proposed WWTP [REP1-019], such as the digesters (part of Work No.8), accurately correlate with the shaded Work No. as shown on the Works Plans [AS-150]. If not, please explain why and highlight any implications for this.</p>	The Design Plans are indicative, save where secured by Article 6, and are provided to assist with understanding what the plant may look like. The Applicant confirms that the parameters of the development identified in the Project Description (Application Reference 5.2.2) and Schedule 14 (of the draft Development Consent Order (Application Reference 2.1) (Revision 8)) and what is shown indicatively on the Design Plans accurately correlate and can be provided within the areas within the Work Nos. shown on the Works Plans (Application Reference 4.3) and within any limits of deviation permitted by Article 6.
10.18	Applicant	<p>SHHG comments Please review and respond to each of the SHHG comments / suggestions on pdf pages 8 to 14 (referenced as SHH40) in [REP4-106] concerning provisions of the dDCO.</p>	The Applicant has responded to this by way of a separate document. This is appended to 8.23 Applicant's Response to Deadline 4 Submissions, provided at Deadline 5.
10.19	CCoC	<p>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 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>	<p>This question is directed at CCoC, however, for the sake of completeness, the Applicant understands that CCoC is now content with the proposals relating to PRoWs and that the current position is reflected in the Statement of Common Ground to be submitted at Deadline 5. Details regarding gates and signage are to be agreed pursuant to Requirement 7 as per the following:</p> <p>Detailed design 7. –(1) No phase of the authorised development is to commence until details of— (c)hard and soft landscaping, boundary treatment, security fencing and signage, gates and ecological habitat creation;</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 Please confirm whether the proposed bridleway would be a permissive route or a permanent PRoW; and If a permissive route, whether this necessitate any amendments to Article 13(4) and Schedule 6, Part 2? To CCoC 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>	While the landowner's initial preference was for a permissive route, it has not been possible to progress a permissive arrangement to the satisfaction of all relevant parties (include Cambridgeshire County Council as relevant PROW authority). Therefore, the Applicant is confirming that the default position in the draft Development Consent Order (Application Reference 2.1) of a permanent public bridleway is to be taken forward. Agreement has been reached with the landowner in this respect. No amendments to the draft Development Consent Order are required.

ExQ1	Question to	Question	Response
11.1	SCDC	Notwithstanding that you disagree with the Applicant's view in respect of whether certain elements of the Proposed Development would constitute inappropriate development (e.g. proposed access road and outfall), are you otherwise satisfied / agree with the contents of the Applicant's Green Belt Assessment [APP-207]? If not, please explain the reasons for this.	No response from the Applicant.
11.2	SCDC	You address SCLP Policy NH/8: Mitigating the Impact of Development In and Adjoining the Green Belt in para 7.16-7.20 of your LIR [REP4-092]. It is unclear whether you imply conflict with the policy as a whole due to the words in para 7.18 or whether you imply compliance with the policy as a whole due to the words in para 7.20. Please clarify, and also set out whether you are satisfied that the Applicant's landscape proposals, associated documents and dDCO requirements would demonstrate the 'suitable mitigating measures' you refer to.	<p>SCLP Policy NH/8 requires development proposals in the Green Belt to be located and designed so that they do not have an adverse effect on the rural character and openness of the Green Belt. The Applicant has acknowledged (eg at paragraph 4.8.41 of the Planning Statement [REP1-049] and section 7, Table 2-11 of 8.13 Applicant's Responses to Written Representations [REP2-038]) that in addition to the harm by reason of inappropriateness, the Proposed Development will cause moderate harm to the openness of the Green Belt and moderate harm to two purposes of including land in the Green Belt as a result of its encroachment into the countryside. These are matters to which substantial weight must be given when considering the very special circumstances presented by the Applicant which it considers are sufficient to clearly outweigh these harms. SCLP Policy NH/8 further states that developments will need to include high quality and careful landscaping and design measures, alongside a requirement that any planting be adequately maintained, to ensure mitigation of any impact on the Green Belt. The Proposed Development includes a fully mitigated outline design and the landscape masterplan and LERMP [REP4-056] are designed to reduce landscape and visual impacts, improve biodiversity and create opportunities for greater recreational use of the countryside.</p> <p>The Applicant's Local Policies Accordance Tables [REP1-054] set out how the proposed development can meet the requirements of SCLP Policy NH/8 through the acceptance of the very special circumstances case and the application and management of a robust landscape strategy. Subject, therefore, to acceptance that there are very special circumstances in this case, the Applicant is of the opinion that the Proposed Development is in compliance with SCLP Policy NH/8.</p>
11.3	SCDC	The ExA notes that whilst not mentioned in your LIR, SCLP Policy S/4: Cambridge Green Belt, is likely to be relevant to the application. Please clarify your views on compliance with this policy.	No response from the Applicant.
11.4	CCoC	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?	No response from the Applicant.

ExQ1	Question to	Question	Response
12.1	Applicant	<p>Mental Wellbeing Impact Assessment Please address the comments of CCoC which were set out in response to ExQ1.12.4 [REP1-134].</p>	<p><u>Information on deprivation</u> The Applicant provides the following responses to the comments made by CCoC in their response to ExQ1 12.4 [REP1-134].</p> <p>The Applicant has reviewed Appendix 12.3: Mental Wellbeing Impact Assessment (MWIA) (App Doc Ref 5.4.12.3) [AS-077] and concluded that the bullet point in table A.3 on page 12 (which reads: <i>Not enough information on deprivation to draw relevant conclusions or recommendations</i>) was included in error.</p> <p>The Applicant did have sufficient evidence to assess deprivation, the findings of which were already included within table A.3 on page 11 and outlined below:</p> <ul style="list-style-type: none"> - <i>Tackling inequalities: access and amenity disruption during construction activities may have a disproportionate effect on areas of relatively higher deprivation – see section 3.1 of the Equalities Impact Assessment (EqIA) (App Doc Ref: 7.12) [APP-211] for further analysis.</i> - <i>The community to the south-west of the study area have a higher rate of deprivation however, with mitigation in place, this community is not expected to be disproportionately adversely affected.</i> <p>The updated Appendix 12.3: Mental Wellbeing Impact Assessment (App Doc Ref 5.4.12.3) is provided at Deadline 5 to remove that bullet point on page 12.</p> <p><u>Presence of vent</u></p> <p>In relation to the EXQ1 12.4 aspect relating to the vent column, the Applicant's assessments within the ES are based on activities at the existing Cambridge WWTP up until the site is decommissioned, this includes consideration of the ventilation column. The Applicant has not reported any air quality or visual effects (within ES Chapter 7 Air Quality (App Doc Ref 5.2.7) [APP-039] and ES Chapter 15 Landscape and Visual Amenity (App Doc Ref 5.2.15) [REP4-032] respectively) due to the ventilation column. No source-pathway-receptor relationship for human health effects has been identified.</p> <p>In response to ExQ1 19.18 (Application Doc Ref 8.3) [REP1-079], the Applicant explains the operation of the vent and concludes that the odour exposure risk associated with the vent stack at all high sensitivity receptors is negligible. The Applicant's partial response to EXQ1 19.18 is provided here for ease:</p> <p><i>The ventilation facility would include a carbon filter to remove odour and a vent stack extending to a height of up to 10m (section 2.6.7 of ES Chapter 2: Project Description (App Doc Ref 5.2.2) [APP-034]). Whilst the vent stack itself is a design feature intended to minimise odour impact through effective dispersion, the carbon filter reduces the odour intensity. According to Table 2.21 of the European Commission (2018) Best Available Techniques Reference Document for Water Treatment, carbon filters remove between 70-99%, whilst the Applicant's odour control unit (OCU) equipment suppliers guarantee 95% H2S (hydrogen sulphide) removal performance of their carbon media.</i></p> <p><i>Table 2-2 of ES Appendix 18.1 Odour Assessment Method and Effects Summary (App Doc Ref 5.4.18.1) [APP-137] presents the qualitative odour risk matrix and odour effects during operation and shows that for the highest odour exposure risk for the 'intermittent odour release from 10m high vent stack' is classified as 'Low' considering the embedded mitigation in the design. This Low odour exposure risk occurs at 'Low' to 'Medium' sensitivity receptors. The IAQM descriptors for magnitudes of odour effects, presented in Table 2-10 of ES Chapter 18: Odour (App Doc Ref 5.2.18) [APP-050] shows that for Low exposure risk coupled with a 'Medium' sensitivity receptor equates to a 'Negligible effect'. The odour exposure risk associated with the vent stack at all high sensitivity receptors is described as 'Negligible'.</i></p>

ExQ1	Question to	Question	Response
			<p>In reference to the response provided to EXQ1 2.33, the Applicant reiterates that the presence of the permanent vent will not affect the delivery of future housing.</p> <p><u>Disproportionate impacts on people with Protected Characteristics</u></p> <p>The Applicant has considered if there is any contradiction on the matters of statements regarding disproportionate impacts on people with protected characteristics. The Applicant concludes that the statement in Table A.3 was prior to mitigation and the statement in Table A.2 was post-mitigation:</p> <ul style="list-style-type: none"> • Table A.2 of ES Appendix 12.3 Health Mental Wellbeing Impact Assessment (App Doc Ref 5.4.12.3) [AS-077], correctly notes: <i>'adverse effects disproportionately impacting people with protected characteristics are unlikely due to the implementation of best practice mitigation measures'</i>. • Table A.3 correctly notes that <i>'there may be indirect negative impacts during construction which disproportionately impact ethnic minorities, older people and those with disabilities or long-term health conditions'</i>. However in Table A.3 the Applicant does not mention that, following the application of mitigation measures, negative impacts are unlikely. • Therefore, the Applicant has amended Table A.3 as follows: <i>there may be indirect negative impacts during construction which disproportionately impact ethnic minorities, older people and those with disabilities or long-term health conditions. However, adverse effects disproportionately impacting people with protected characteristics are unlikely due to the application of best practice mitigation measures. Requirements 8 and 9 of the draft DCO requires the implementation of the Code of Construction Practice (CoCP).</i> <p>The updated Appendix 12.3: Mental Wellbeing Impact Assessment (App Doc Ref 5.4.12.3) is provided at Deadline 5.</p>
12.2	Applicant, CCC, SCDC	<p>Mental Wellbeing Impact Assessment</p> <p>The Applicant has prepared a Mental Wellbeing Impact Assessment (MWIA) [AS-077] which does not identify potential significant effects that require further MWIA.</p> <p>To the Applicant:</p> <p>CCC noted [REP2-043, para 12.33] that there is no specific reference in chapter 5.2 as to how mitigation would be secured, or when further assessments would be undertaken to monitor change have been included. SHHG has made a similar comment (para 10.3.3 (v) of WR [REP1 -171]). Please respond to these comments.</p> <p>To CCC and SCDC:</p> <p>Are you satisfied with mitigation measures in relation to potential mental health impacts being secured by way of the CoCP Parts A and B [REP3-026 and REP3-028] and the Community Liaison Plan [AS-132]? If not, please suggest how the mitigation measures should be secured.</p>	<p><u>In response to CCC's comment in paragraph 12.33 of [REP2-043]:</u></p> <ul style="list-style-type: none"> • Regarding securing of mitigation, as noted within the second part of ExQ1 12.5, the Applicant confirms that mitigation measures for potential mental health impacts are secured through requirements 8 and 9 within the dDCO in relation to the CoCP Part A and B (App Doc Ref 5.4.2.1 and 5.4.2.2) [REP4-040 and REP4-042] and the Community Liaison Plan (App Doc Ref 7.8) [REP4-078]. • Regarding the need for further monitoring, the ES Appendix 12.3 Mental Wellbeing Impact Assessment (MWIA) (App Doc Ref 5.4.12.3) concludes that no further appraisal is needed and therefore no associated monitoring would be required. <p><u>In response to SHH's comment in paragraph 10.3.3(v) of [REP1-171]:</u></p> <ul style="list-style-type: none"> • The Applicant has reported noise, odour, landscape and visual effects on receptors within the respective assessments (ES Chapter 17 Noise and Vibration (App Doc Ref 5.2.17) [AS-036]; ES Chapter 15 Landscape and Visual Amenity (App Doc Ref 5.2.15) [REP4-032]; and ES Chapter 18 Odour (App Doc Ref 5.2.18) [APP-050]). The ES Chapters also identify relevant mitigation where required to avoid / reduce / manage noise, odour, landscape and visual effects on receptors over the duration of the Proposed Development. These mitigation measures also minimise impacts such that there would be no significant health effects. • Section 7 of ES Appendix 12.3 Mental Wellbeing Impact Assessment (MWIA) (App Doc Ref 5.4.12.3) provides further references to measures that will be implemented to avoid or reduce potential negative impacts. The appointed contractors will be required to implement the Code of Construction Practice (CoCP) Part A and B (App Doc Ref 5.4.2.1 & 5.4.2.2.) [REP4-040 and REP4-042], which includes measures to prevent and minimise potential negative impacts such as noise levels, emissions, and visual impacts. Specific measures would be contained with the detailed CEMP for the phase, including any appended sub plans, and under Requirement 9 of the dDCO the detailed plan would be approved by the

ExQ1	Question to	Question	Response
			<p>relevant local authority.</p> <ul style="list-style-type: none"> The Applicant also refers to the application of the measures within the Community Liaison Plan (CLP) (App Doc Ref 7.8) [REP4-078], which are secured by Requirement 9 of the draft DCO (App Doc Ref 2.1) [REP4-003], which requires the preparation of a detailed CLP to be approved by the relevant local authority. The CLP will, amongst other things provide a conduit for the continued engagement with the community throughout the construction of the Proposed Development. This would provide local residents and community members a forum to raise and address concerns including health and wellbeing matters.
12.3	CCC, SCDC	<p>Equality – Gypsies, Roma, Travellers In its response to ExQ1.12.6 [REP1-079] the Applicant states that it was advised to communicate with the Gypsy, Roma and Traveller population via the Traveller Liaison Officer. Is the Traveller Liaison Officer (TLO) a Council employee? Could the TLO confirm that consultation has been undertaken on behalf of the Applicant and whether or not any feedback was given by the Gypsy, Roma and Traveller population? Should future consultation / liaison with the Gypsy, Roma and Traveller population be carried out via the TLO? To address the comments at 12.27, 12.28 and 12.30 of CCC's LIR [REP2-043], what measures should be included in the CLP?</p>	No response from the Applicant
12.4	Applicant	<p>Existing WWTP – pests Whilst your response relates to the decommissioning phase of the existing WWTP, ExQ1.12.7 related to the situation after the existing WWTP site has been decommissioned, pending any redevelopment. Please respond to the question as originally posed.</p>	The Applicant does not consider that following decommissioning with the correct closure and cleaning of the site there will be a risk of pests that requires mitigation or management prior to the redevelopment of the site.
12.5	CCoC	<p>Existing WWTP – decommissioning phase impacts In your RR and in 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>	No response from the Applicant
12.6	Applicant	<p>Proposed WWTP – mitigation measures ExQ1.12.15 asked whether, given that the CEMP would relate to the construction phase, it is this the most appropriate mechanism to deal with operational phase effects. You said that you would update Table 5-2 in ES Chapter 12: Health [APP-044] to remove reference to CEMP for potential risk to human health from hazardous waste and substances and replace this with a reference to the Site Management Waste Plan (SWMP). Should this reference be to the Site Waste Management Plan; and If so, according to the dDCO the Site Waste Management Plan would form part of the CEMP – therefore, it is unclear to the ExA how this would address the matter raised in the original question. Please clarify.</p>	<p>The Applicant accepts that the reference should be to a Site Waste Management Plan (SWMP); and that this and the CEMP would not be suitable to secure mitigation for potential risk to human health from hazardous waste and substances in the operational phase. Instead, the Applicant refers to the written management system developed for the facility tailored to cover regulations and laws relevant to the facility as well as specific environmental permit conditions relevant to the proposed WWTP. In this way the management procedures and plans prepared for the facility will be developed so that the facility operates in compliance with relevant laws, regulations, environmental permit conditions and any corporate policy that apply to the facility. The written management system specific to the facility would be used in support of environmental permit applications and once operation commences the operator must implement the management system or they will be in breach of the permit.</p> <p>ES Chapter 12 Health (App Doc Ref 5.2.13) and ES Appendix 2.6 Mitigation Tracker (App Doc Ref 5.4.2.6) have been updated to clarify the use of the written management system and provided at Deadline 5.</p>

ExQ1	Question to	Question	Response
13.1	Applicant	<p>Effects Please clarify the reason why Fen Ditton Conservation Area (HE096) is not considered in ES Chapter 13 [REP4-030] under permanent construction effects (paras 4.2.39 to 4.2.59) when Table 1.3 of [REP4-066] identifies adverse effects in this regard (and noting that Horningsea Conservation Area (HE097) is considered for permanent construction effects in ES Chapter 13 when Table 1.3 suggest it would experience a lesser degree of harm in this regard). Please update ES Chapter 13 as necessary.</p>	<p>The Applicant confirms in paragraph 2.2.5 of ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) [REP4-030] that only significant effects and effects to key assets identified by stakeholder consultation and site survey would be reported in the ES chapter. All effects (including non significant effects) are reported within ES Appendix 13.4 Historic Environment Impact Assessment Tables (App Doc Ref 5.4.13.4) [REP4-066]. As only minor impacts and slight adverse effects (non-significant effects) were identified on the Fen Ditton Conservation Area (HE096), these were not originally reported in ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) [REP4-030].</p> <p>For clarity, the Applicant has provided an updated ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) at Deadline 5 that updates paragraph 4.2.40, 4.2.48, 4.2.51 and 4.2.58, which now includes details on the permanent construction effects relating to Fen Ditton Conservation Area (HE096). There is no change to the conclusions of the Historic Environment assessment as a result of including this information within the chapter.</p>
13.2	Applicant	<p>Effects Please provide details of the size, height and location of the 'ventilation column', and clarify the need for the permanent access route to 'Ventilation Shaft 4' referred to in Table 1.3 for permanent construction effects on Fen Ditton Conservation Area (HE096).</p>	<p>The Applicant has amended Table 1.3 of ES Appendix 13.4 Historic Environment Impact Assessment Tables (App Doc Ref 5.4.13.4) and provided at Deadline 5, to remove reference to the ventilation column, which was retained in error from an earlier document draft. The ventilation column was removed from the design prior to the submission of the DCO, featuring only in a pre-application version of the proposals. The Design of the Proposed Development is included in ES Chapter 2 (App Doc Ref 5.2.2).</p>
13.3	Applicant	<p>Effects Please clarify the reason why Fen Ditton Conservation Area (HE096) and Horningsea Conservation Area (HE097) are not included in Table 4.2 of ES Chapter 13 [REP4-030] given the adverse effects noted in Table 1.3 of [REP4-066]. Please update ES Chapter 13 as necessary.</p>	<p>The Applicant has updated Table 4.2 in ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) at Deadline 5 to include minor adverse impact resulting in Slight Adverse Effect on Fen Ditton Conservation Area and Negligible Adverse Impact resulting in Slight Adverse Effect on Horningsea Conservation Area. There is no change to the conclusions of the Historic Environment Assessment as a result of including this information within the chapter.</p>
13.4	Applicant	<p>Effects Please clarify the reason why paras 4.2.45 and 4.2.50 of ES Chapter 13 [REP4-030] reports minor adverse permanent construction impacts and effects before mitigation on Baits Bite Lock Conservation Area (HE095), when Table 1.3 of [REP4-066] reports moderate adverse impacts and effects in this regard, as does ES Chapter 13 Table 4.2. Please update ES Chapter 13 as necessary.</p>	<p>In Table 1.3 of ES Appendix 13.4 Historic Environment Impact Assessment Tables (App Doc Ref 5.4.13.4) [REP4-066], the Applicant describes the impacts and effects prior to the application of any mitigation. The Applicant reports an unmitigated moderate adverse effect to Baits Bites Lock Conservation Area (HE095).</p> <p>In paragraph 4.1.1 of ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) [REP4-030], the Applicant identifies that the impacts and effects described in paragraph 4.2.45 and 4.2.50 on Baits Bites Lock Conservation Area (HE095) are considered after the application of primary and tertiary mitigation (mitigation is detailed in section 2.9). This identifies the effect before the application of secondary mitigation as a minor adverse permanent construction effect.</p> <p>Table 4.1 of ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) [REP4-030] combines the outcomes of the above. It identifies the magnitude of impact and resultant effect prior to the application of mitigation (as shown in Table 1.3 of ES Appendix 13.4 Historic Environment Impact Assessment Tables (App Doc Ref 5.4.13.4) [REP4-066]) and the magnitude of impact and resultant effect following the application of all mitigation as described earlier in the ES chapter. However, as discussed in paragraphs 4.2.53 to 4.2.56, for effects on Baits Bite Lock Conservation Area, no secondary mitigation has been identified that would reduce the overall significance of effect further. Therefore, the significance of effect (after secondary mitigation) is the same as stated in paragraph 4.2.45 and 4.2.50, after the implementation of primary and tertiary mitigation. The significance of effect after the application of all mitigation on Baits Bites Lock Conservation Area (HE095) remains at a minor adverse permanent construction effect.</p> <p>The updated ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) provided at Deadline 5 has therefore not been amended in response to this comment.</p>

ExQ1	Question to	Question	Response
13.5	Applicant	<p>Effects / mitigation</p> <p>Following on from the above question, please clarify how, as identified in Table 4.2 of ES Chapter 13 [REP4-030], mitigation would reduce 'moderate adverse effects' on Baits Bite Lock Conservation Area (HE095) to 'slight adverse effects' when it is acknowledged in para 4.2.54 that mitigation would not reduce impact magnitude (and would also not change significance of effect for other heritage assets including Biggin Abbey and HLCA22). Please update ES Chapter 13 as necessary.</p>	<p>The Applicant directs the ExA to the above response on ExQ2 13.4. The Applicant reports the significance of effect on Baits Bites Lock Conservation Area (HE095), following the application of primary and tertiary mitigation, as a minor adverse permanent construction effect. The application of secondary mitigation as reported in paragraph 4.2.54 of ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) [REP4-030] does not further reduce the significance of effect.</p> <p>The updated ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) provided at Deadline 5 has therefore not been amended in response to this comment.</p>
13.6	Applicant	<p>Effects</p> <p>Please clarify the reason why Fen Ditton Conservation Area (HE096) is not considered in the Waterbeach pipeline section of ES Chapter 13 (e.g. para 4.2.61) [REP4-030] when this element would pass through and near to the conservation area.</p>	<p>The Applicant has updated Table 4.3 in ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) and provided at Deadline 5 to include the temporary impacts and effects of the construction of Waterbeach pipeline on Fen Ditton Conservation Area (HE0960). This Slight Adverse Effect is a result of both the temporary construction activities relating to the Waterbeach Pipeline and those relating the Proposed WWTP. Fen Ditton Conservation Area is now included within each table (4.1 and 4.3) to highlight this, but the impact reported in both tables is considerate of all impacts. Therefore this is a repeat of information in both tables, and not two distinct effects. There is no change to the conclusions of the Historic Environment Assessment as a result of including this information within the chapter.</p>
13.7	SCDC	<p>Effects</p> <p>Regarding para 9.37 of your LIR [REP4-092]: Please provide further justification for your view that the operational effects would be moderate adverse and thus significant (albeit less than substantial); and Clarify whether your view on this matter relates to all five designated heritage assets listed in para 4.3.3 of ES Chapter 13 [REP4-030].</p>	<p>No response from the Applicant.</p>
13.8	SCDC	<p>Effects</p> <p>Whilst you disagree with some of the Applicant's reported effects on designated heritage assets, you agree that any harm to their significance would be less than substantial. Accordingly, do you consider that your concerns in this regard would be material to the overall planning balance?</p>	<p>No response from the Applicant.</p>
13.9	Applicant	<p>Effects</p> <p>The ExA understands that the permanent adverse construction effects identified in ES Chapter 13 [REP4-030] would remain over the lifetime of the Proposed Development, given their permanence. Please clarify whether any adverse operational effects, even if negligible, might add to any permanent adverse construction effects, to increase the overall effect?</p>	<p>The Applicant does not consider that the Permanent Construction Effects and Operational Effects should be combined.</p> <p>The assessment of operational effects and permanent construction effects on heritage assets are distinct and are assessed separately since the effects would be experienced at different times throughout the lifetime of the Proposed Development. Furthermore, the nature of change with the potential to create an impact is also different between Permanent Construction and Operation. Permanent Construction effects consider aspects such as the presence of permanent structures, change in land use and are measured from year 15 onwards when landscape planting has reached maturity. Operational effects consider aspects such as the light, noise and odour produced from year 0 once operation of the Proposed Development starts. This is further explained in section 2.4 of ES Chapter 13 Historic Environment (App Doc Ref 5.2.13) [REP4-030]. By considering the Operational and Permanent Construction effects separately the methodology applied by the Applicant has ensured all effects are thoroughly captured, and effects relating to the operation of the Proposed Development are not overlooked in focusing on those from the permanent presence of the Proposed WWTP.</p> <p>There is no standard industry guidance which defines an agreed approach for the combination of assessment of permanent construction and operational effects on the historic environment. The following guidance, comprising all relevant assessment guidance, informed the production of ES Chapter 13 [REP4-030]:</p>

ExQ1	Question to	Question	Response
			<ul style="list-style-type: none"> • Chartered Institute for Archaeologists (CIfA) for Historic Desk Based Assessment (Chartered Institute for Archaeologists, 2020); • Conservation Principles, Policies and Guidance (English Heritage, 2008); • Historic Environment Good Practice Advice in Planning Note 2: managing significance in decision making (Historic England, 2017); • Historic Environment Good Practice Advice in Planning Note 3: the setting of heritage assets (Historic England, 2017); • Statements of Heritage Significance: Analysing Significance in Heritage Assets (Historic England, 2019); • Principles of Cultural Heritage Impact Assessment in the UK (IEMA, CIfA, & IHBC, 2022); • DMRB: LA106 Cultural Heritage Assessment (Highways England, 2020a); and • DMRB: LA104 Environmental assessment and monitoring (Highways England, 2020b). <p>The agreement of approach for each EIA is typically managed through stakeholder agreement of the methodology through Scoping Response and the Statements of Common Ground. The acceptance of the methodological approach to assessing the effects of the scheme has been agreed with the relevant stakeholders. This is captured in Statement of Common Ground: South Cambridgeshire District Council Table 4.12 (App Doc Ref 7.14.11) [REP1-065]; Statement of Common Ground: Cambridgeshire County Council Table 4.5 (App Doc Ref 7.14.4) [REP1-063], and Statement of Common Ground: Historic England and Table 4.1 [REP1-063]. Therefore, combining these effects would also not be consistent with the agreed methodology.</p>
13.10	SCDC	<p>Mitigation / Monitoring Your LIR [REP4-092] at para 9.43 suggests that mitigation measures are monitored during operation, albeit that you are unable to identify mitigation in this regard. The Applicant notes in Table 5-1 of ES Chapter 13 that bunding, planting and lighting control may assist with mitigating adverse effects. These would appear to be secured through relevant requirements of the dDCO and associated documents. What is it specifically you would like to see in addition to this?</p>	No response from the Applicant.
13.11	SCDC	<p>Mitigation / Monitoring Your LIR [REP4-092] at para 16.15 suggests that construction lighting should be monitored through the CEMP. The CoCP Part A sets out measures for lighting control, as does the Lighting Design Strategy, to be secured by R14 of the dDCO. What is it specifically you would like to see in addition to this.</p>	No response from the Applicant.
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>	No response from the Applicant.

ExQ1	Question to	Question	Response
14.1	Woodland Trust, CCoC	Trees The Arboricultural Impact Assessment [REP1-035] has been updated to reflect standing advice in respect of veteran tree T105. Are you satisfied that this overcomes your concern in this regard?	No response from the Applicant
14.2	SCDC	Assessments Your LIR (including para 8.14) [REP4-092] makes reference to the Greater Cambridge Landscape Character Assessment not having been considered by the Applicant as part of ES Chapter 15 [REP4-032]. However, it is referred to in Tables 1-2 and 2-4 and in paras 3.1.1 and 3.1.3 of this ES chapter. Please therefore clarify your concern in this regard.	No response from the Applicant
14.3	Applicant	Woodland Your response to ISH3 Action Point 55 [REP4-087] appears to confirm some woodland loss. Please identify on a plan where this loss would be or signpost to where this is shown and addressed, such as in the Arboricultural Impact Assessments (AIA) [APP-102 and REP1-035] (and if not, confirm whether any documents, such as the AIA, need updating as a result).	<p>The Applicants responses to ExQ1 5.24 (App Doc Ref 8.3) [REP1-080] refers to temporary losses of habitats associated with the land required for the construction of the Waterbeach transfer pipeline and transfer tunnel to habitat types 'lowland mixed deciduous woodland' and 'other woodland; broadleaved habitat' respectively.</p> <p>Although there may be a temporary loss of a habitat type this does not mean that there are trees within these areas that have not been captured within the AIA reports. The Arboricultural Impact Assessments (AIA) reports [APP-102 and REP1-035] correctly denote all affected trees, and neither document needs updating.</p> <p>The table appended to EXQ1 5.24 is derived from the habitat maps provided in Appendix A.1 'Baseline Habitats' of the BNG Report [REP4-055]. Sheets 5 – 7 show the Waterbeach pipeline north of Low Fen Drove Way, and sheets 1- 2 cover the extent of the transfer tunnel. Loss of habitat types are a worst case and in reality would be in the first instance minimised by measures within section 7.2 of the CoCP Part A- [REP4-041], specifically to avoid habitats (which would include trees within them) through careful siting and adjustment of construction widths and then to reinstate habitats where loss is not avoidable.</p> <p>The ES Chapter 8 (App Doc Ref 5.2.8) section 4 paragraphs 4.2.34 – 4.2.55 and 4.2.480 –4.2.260 - consider impacts to habitats including those that include trees.</p> <p>An Appendix to this question is provided to indicate the location of the very small areas of habitat referenced in response to EXQ1 5.24.</p>
14.4	SCDC	Bund planting The Applicant has provided some further information relating to the establishment of planting on bunds at Appendix H of its response to hearing Action Points [REP4-087]. Does this (along with the contents of the updated LERMP submitted at D4 [REP4-056], Design Code [REP4-085] and associated dDCO requirements) assist with alleviating your concerns in this regard? If not, please justify your reasons and if possible, provide any suggestions which may assist with overcoming your concern.	SCDC has confirmed to the Applicant (e mail dated 7 February 2024) that it acknowledges that the Applicant has provided as much consideration as possible to the planting atop the bund to try to ensure the long-term survival of the plants.
14.5	CCoC	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.	No response from the Applicant.

ExQ1	Question to	Question	Response
14.6	Applicant	<p>Landscape, Ecological and Recreational Management Plan (LERMP) LERMP Table 4-1 [REP4-056] refers to a 'Soft Landscape Specification' in respect of trees, shrubs and hedgerows. Please signpost to where this specification can be found, or provide this if it has been omitted.</p>	<p>The LERMP states that new planting shall follow best practice in regards to soil specification and handling, time of year, soil ameliorants, planting method, support, irrigation and protection.</p> <p>The detailed specification will be provided as part of the detailed matters submission. Given the complexity and variety of habitats and mix of landscape typologies proposed, a process of input and review will be required from stakeholders including Natural England and the local authority, as well as the ecologist and soils consultant, etc., and therefore the Landscape Specification will be provided at that time.</p>
14.7	Applicant	<p>LERMP The ExA notes your response to ExQ1.14.16b. However, the question related to woodland planting in LERMP Table 4.2 [REP4-056]. The row under the 'Objectives' section indicates that any trees that fail to thrive in the first year would be replaced. However, Table 5.1 indicates that any woodland tree which fails would be replaced over a longer period. Please clarify.</p>	<p>The objectives set out in Table 4.2 for woodland planting are correct in terms of replacement of losses in the first year for woodland planting. Table 5.1 has been corrected in the updated LERMP to reflect intentions as below:</p> <p>Monitor and record any plant losses. Remove dead materials where this has the potential to hamper growth or condition.</p> <p>In the woodland blocks, tree and shrub species supplied as young transplants (1+1 and 'Feathered' specification) have been proposed at a density that takes into account some minor losses (up to 10%) in the first year as the plants establish. Trees and shrub transplant failures that exceed 10% will be replaced in the first five years, supplied as the original species, size and specification proposed. Thereafter, at five year intervals, tree and shrub species that fail will be replaced at a rate that takes into account a program of thinning, removing 25% of trees by year 10 across all blocks; thereafter on 5 - 10 year intervals removing 25% of the remaining trees, this proportion decreasing to 10-15 per cent after 5 or so thinnings. Where a single species shows consistent losses, signs of disease, or planting method or location appear to be the cause, review the method or choice of species and consider an amendment to original proposals.</p> <p>In the woodland blocks, those limited numbers of trees supplied as standard trees (12-14cm girth/heavy standard or larger) will fall under the replacement strategy set out under 'All new tree, shrub and hedgerow planting' above.</p> <p>The updated LERMP is provided as part of the Deadline 5 submission.</p>
14.8	Applicant	<p>LERMP Notwithstanding responses to previous ExQs, it remains unclear to the ExA the reason why, in LERMP Table 4.2 [REP4-056], some timeframes are noted as 'not applicable', for example, relating to proposed new areas of woodland maintenance visits. Please clarify.</p>	<p>The updated LERMP includes a review and update of the timeframes column within tables 4.1, 4.2 and 5.1.</p> <p>The updated LERMP is provided as part of the Deadline 5 submission.</p>
14.9	Applicant	<p>LERMP Please explain why in LERMP Table 4.2 [REP4-056], proposed screen planting operations do not include some of the operations that tree or woodland planting includes, such as maintenance, failures and protection? Please also clarify what 'screen planting' is and where on the plans within</p>	<p>An updated LERMP is provided as part of the Deadline 5 submission with a version of Figure 3.1 identifying screen planting.</p>

ExQ1	Question to	Question	Response
		<p>the LERMP this is shown?</p>	<p>Screen planting is all the initial planting and the tree planting on the earth bank.</p> <p>The 'Proposed screen planting' category in 4.2 refers specifically to the screen planting. In the updated LERMP this section of table 4.2 has been clearly defined and detail has been added to clarify that the maintenance set out in the rows above apply also to screen planting. The row on screen planting is specific to the additional attention to screen planting due to its function. Screen planting does not include 'woodland' other than the 7.5m screening strips shown on LERMP figure 3.1.</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 incomplete MWIA [APP-113]. An updated version was provided at [AS-077]. Does this alleviate your concerns in this regard?</p>	<p>No response from Applicant.</p>

ExQ1	Question to	Question	Response
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>This policy concerns mineral safeguarding areas. The Applicant has addressed this in the Land Quality Chapter 14 of the ES [AS-032]. At paragraph 4.2.7 it states that minerals encountered will be reused in the Proposed Development. Paragraph 5.1 also states that no significant effects on Mineral Safeguarding Areas have been identified as only 0.18% of the Chalk area is affected and 0.02% of the sand and gravel area is affected. Consequently the Proposed Development accords with MWLP Policy 5.</p>
15.2	EA	<p>Assessment / Monitoring Do you have any outstanding concerns regarding the Applicant's land quality assessments or monitoring proposals?</p>	
15.3	NE	<p>Soil management Does the Applicant's response to your RR [RR-015] on p187/8 [REP1-078] regarding details of soil profiles and soil balance being contained within the LERMP satisfactorily address your concerns, including those contained within Appendix 1 of your RR? If not, please provide further justification.</p>	
15.4	Applicant	<p>Mitigation Within SCDC's LIR [REP4-092], it makes suggestions for requirements regarding land contamination (paras 12.18-12.20). During ISH3, the Applicant confirmed in response to this matter that a quantitative risk assessment would be provided at D5. Is this still the Applicant's intention, and if so, how would this specifically address the requests within paras 12.18-12.20 of SCDC's LIR?</p>	<p>The Applicant confirms that a Generic Quantitative Risk Assessment (App Doc Ref 5.4.14.11) has been provided at Deadline 5. This presents existing ground investigation data in the format of a Generic Quantitative Risk Assessment (GQRA) as set out in the Environment Agency's Land Contamination Risk Management (LCRM) guidance (as requested in para 12.19 of SCDC's LIR [REP4-092]). This includes an update of the preliminary conceptual site model and assessment of risk to human health from soils and ground gas together with risks to controlled waters from on-site contamination. The report provides conclusions as to whether there are any unacceptable contamination risks, the need for further investigation, or remediation works in accordance with LCRM. The GQRA includes available ground investigation factual data as appendices (as requested in para 12.20 of SCDC's LIR [REP4-092]). The conclusions of the GQRA do not affect the conclusions of ES Chapter 14 Land Quality (App Doc Ref 5.2.14)</p>

ExQ1	Question to	Question	Response
16.1	Applicant	<p>Hazardous loads / waste In response to ExQ1.16.2 [REP1-079] you have stated that ES Chapter 19 reports neutral / no significant effects in relation to the delivery of hazardous loads. However, in response to ExQ1.20.46 [REP1-079] and in relation to an inconsistency in the application documentation you have stated that hazardous loads have been reassessed with a correct figure of 2,280m³ which would lead to a significant effect, and some documents updated accordingly.</p> <ul style="list-style-type: none"> • Please clarify whether your response to ExQ1.20.46 affects your response to ExQ1.16.2; • Please clarify whether the correct figure of 2,280m³ alters any of your analysis or conclusions in the section 'Hazardous and contaminated waste' from para 4.2.42 of [REP4-034]; • In para 4.2.47 of [REP4-034] you state that There are very limited sources of land contamination within and adjacent to the Scheme Order Limits. ...Therefore, there are no potential sources of hazardous waste. Please clarify whether this is correct; and • In response to ExQ1.16.2 you stated that no hazardous loads are currently expected in relation to the construction and decommissioning of the Proposed Development. Please clarify whether this statement is still correct. 	<ul style="list-style-type: none"> • The Applicant confirms that the response to ExQ1.20.46 does not affect the response to ExQ1.16.2 because the edits to Chapter 19 (App Doc Ref 5.2.19) indicated in response to EXQ1.20.46 were based on an initial comparison of the IEMA 1993 and 2023 guidance, which identified a potential moderate effect on hazardous loads on a worst case basis. The Applicant has subsequently completed a more detailed comparison of the IEMA 1993 and 2023 Guidance [REP3 040] that concluded that despite the increase in hazardous loads, which equated to 152 vehicle movements across the life of the project, equivalent to less than 1 per week, the impact magnitude remains negligible. <p>The ES Chapter 19 (App Doc Ref 5.2.19) also explained that vehicle movements estimated for movements of hazardous loads were not sufficient to warrant a separate assessment: <i>'Given the low number of HGVs required, the number of HGVs delivering hazardous loads is not significant and the magnitude of impact is considered to be negligible. A detailed environmental assessment of the effect based on IEMA guidance on hazardous loads is not required for the construction phase'</i>.</p> <p>The original response to ExQ1.20.46 however should have been reflected in the response to ExQ1.16.2, i.e. that although hazardous loads are not expected, a worst case consideration of unknown contamination that could generate hazardous waste and therefore movements of 'hazardous' loads has been considered. The focus of EXQ1.16.2 was on the movement of hazardous loads and the specific risk of accidents involving such loads, including the movement of LNG in operation. The mitigation referred to in the response to EXQ1.20.46 relates to controlling movements of vehicles to avoid peak hours. In relation to the specific risk associated with hazardous loads, (termed 'Dangerous Goods' that are potentially dangerous (hazardous) when carried), the Applicant refers to existing regulations and controls governing the packaging and movement of these:</p> <ul style="list-style-type: none"> ○ The United Nations Agreement Concerning the International Carriage of Dangerous Goods by Road ('ADR 2017') ○ Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations (CDG) 2009 which implement the ADR 2017 (with some exceptions). <p>Regulations place duties on each party involved in the carriage of dangerous goods, to ensure the risk of incidents is minimised, and to ensure an effective response. The authorities responsible for enforcing the regulations for road transport are the Health and Safety Executive (HSE), the Driver and Vehicle Standards Agency (DVSA), and the police.</p> <p>The Carriage of Dangerous Goods Manual (HSE, 2024) sets out various controls relating to matters including but not limited to packaging, tanks, consignment procedures, loading and unloading and crew and vehicle requirements.</p> <p>Based on the above there is an existing regulatory framework in place for the management of risks associated with the movement of potentially dangerous (hazardous) loads. The types and quantity of hazardous loads associated with the Proposed Development do not require further assessments (such as catastrophe analysis) and that transport related hazard assessment would be integrated into the ongoing risk assessments completed as part of the construction and operation phases of the Proposed Development.</p>

ExQ1	Question to	Question	Response
			<ul style="list-style-type: none"> The estimated figure of 2,280m³ does not alter the analysis or conclusions in the section 'Hazardous and contaminated waste' from paragraph 4.2.42 of ES Chapter 16 Material Resources and Waste (App Doc Ref 5.2.16)], because this section is reporting on the material related to the proposed WWTP extent (which is 330m³ and 0.002% of the landfill capacity)), whereas the 2,280m³ value combines estimates for potentially contaminated material excavated within the Order Limits and is the total quantity estimated. Section of ES Chapter 16 Material Resources and Waste (App Doc Ref 5.2.16) has been updated to clarify as follows: <p>4.2.47 There are very limited sources of land contamination within and adjacent to the Scheme Order Limits. These are limited to: previous on site agricultural (crop and grazing) uses at the proposed WWTP; and the existing highways and railway lines crossed by proposed infrastructure; and the Waterbeach WRC which is proposed to be used as a construction compound only. Adjacent potential source sites are limited to further highways, dismantled rail infrastructure and the existing Cambridge WWTP. Therefore, there are no known potential sources of hazardous waste. As On a precautionary basis, taking into account the long standing use of the site, the existing WWTP is considered as a potential contaminant source. Therefore, for the purpose of assessment, to allow for unidentified contaminated land, 5% of excavated material originating from the tunnel excavation within the area of the existing Cambridge WWTP is assumed hazardous. T and this equates to 330m³ and which would be required to be landfilled (see Table 2-8 in 'Materials resources and waste estimates' (Application Document Ref 5.4.16.1).</p> <p>4.2.48 Other sources of hazardous waste may occur in construction as a result of pollution incidents such as spills and leaks whereby the response and clean up and or remediation could result in small quantities of hazardous waste which would be required to be landfilled.</p> <p>4.2.49 All of the material excavated from the River Cam for the construction of the outfall is assumed to be potentially contaminated. The volume required for removal is estimated as 150m³ and as a worst case would be required to be landfilled after treatment, see Table 2-8 in 'Materials resources and waste estimates' (Application Document Ref 5.4.16.1).</p> <p>4.2.50 The baseline has identified that the waste infrastructure in East of England does not have capacity to accommodate hazardous waste, if disposal of hazardous waste to landfill is required. Any hazardous waste would therefore need to be transported to neighbouring regional landfills, listed in Table 3-12. Based on the estimates completed for the proposed WWTP, disposal of 330m³ of waste would reduce the national hazardous landfill void capacity by 0.002%.</p> It should be noted that these paragraphs relate to effects reported in relation to the Proposed WWTP (including the landscaping proposals, final effluent pipeline, outfall, transfer tunnel and new access connection with the B1047 Horningsea Road). The statement referred to in paragraph 4.2.47 of ES Chapter 16 Material Resources and Waste (App Doc Ref 5.2.16) is correct based on the ground investigation surveys completed to date that there are no known sources of contamination that would generate hazardous waste. As there are no known sources of contamination that would lead to hazardous waste, there are no hazardous loads expected. Accordingly, sources of contamination that could result in hazardous waste are from unknown contamination. As described in the above point, as a worst case for the purpose of assessment, an

ExQ1	Question to	Question	Response
			<p>assumption is made that 5% of excavated material originating from the tunnel excavation is assumed to be hazardous. Paragraph 4.2.27 ES Chapter 16 Material Resources and Waste (App Doc Ref 5.2.16) has been updated as indicated above and provided at Deadline 5.</p> <ul style="list-style-type: none"> It is correct that, based on known land quality and known materials needed for the construction of the proposed WWTP, no hazardous loads are expected; however, on a precautionary basis, an assumption has been made that 5% of excavated material associated with tunnel works including those within the existing Cambridge WWTP are contaminated. So, whilst none are expected, a worst case approach has been adopted whereby there would be 304 movements to remove a total of up to 2,280m³ of material for disposal to hazardous landfill. Decommissioning for the purpose of permit surrender is limited to tank draining and cleaning, isolation of electrics and puncturing of tanks these activities will not generate hazardous waste.
16.2	Applicant	<p>HSE's response The HSE's letter dated 8 August 2022 [REP1-080, PDF page 128/161] that was provided in response to EXQ1.16.5 states that HSEs advice remain the same as advised in letter dated 26th October 2021. Please provide a copy of the letter of 26 October 2021.</p>	<p>The letter from the HSE dated 26th October 2021 was submitted to The Planning Inspectorate and forms part of Appendix 2 of the Scoping Opinion (App Doc Ref 5.4.4.1) [APP-079] A further copy, extracted from the Scoping Opinion is appended at Appendix F.</p>
16.3	Applicant	<p>Operational phase – security and safety, access and evacuation In relation to your response to ExQ1.16.16 [REP1-079] which notes that access would also be available for emergency and security purposes via the gaps in the earth bund, please clarify:</p> <ul style="list-style-type: none"> How, in practice access for vehicles would work given the tree planting surrounding the proposed WWTP, the change in levels between the proposed WWTP access road and the adjacent landscaped areas and the potential use of a 'vehicle restraint system' (e.g. see Figure 2.17 of ES Chapter 2 [REP4-022]); and Whether any hardstanding / paved surfaces that are not shown on the submitted drawings would be provided to enable large / heavy vehicles (such as fire tenders) to cross the landscaped area? If so, please indicate the approximate surface area of those hardstanding / paved areas. 	<p>The Applicant would like to clarify that when it stated that the ventilation gaps in the earth bank would include emergency access/exits in ExQ1 16.16, it was referring to pedestrian use not large or heavy emergency vehicles such as fire engines. Emergency vehicles would access the proposed WWTP via the main entrance and navigate via the internal road system. This is the approach as agreed in the Statement of Common Ground with the Emergency Services 'The site will be constructed in consideration for fire appliance access and site firefighting provision will be provided in accordance with the requirements of the service.'</p> <p>The emergency vehicles will use the existing proposed roads (permanent site access and internal roads) as shown on the submitted drawings. No additional hard standing or paved surfaces are required relating to the use of the ventilation gaps in emergencies beyond the permissive paths shown in the Landscape, Ecological and Recreational Management Plan (LERMP) (App Doc Ref 5.4.8.14)).</p>
16.4	Applicant	<p>Wildlife Hazard Management Plan Please update the application documentation to address Cambridge City Airport's comment [REP1-161] which states that In relation to section 3.2 of the Wildlife Hazard Management Plan ("WHMP"), it should be highlighted that the Airport no longer operates under EASA regulation. The airport is now back operating under UK CAA regulations – UK Regulation (EU) No 139/2014 and consequently the WHMP and any other affected documentation should be updated accordingly.</p>	<p>The document has been updated and provided at Deadline 5.</p>

ExQ1	Question to	Question	Response
17.1	Applicant	<p>Proposed WWTP – operational phase effects</p> <p>In response to ExQ1.17.17 [REP1-079] you noted that CoCP Part A (App Doc Ref 5.4.2.1) [APP-068] is specifically for the construction phase, however, some measures identified could also be applicable to the operational phase. Please explain which measures would be applicable to the operational phase and how these would be secured.</p>	<p>In the Applicant's response to ExQ1 17.17, it was stated that measures in sections 7.9.15 and 7.9.16 of the CoCP Part A (App Doc Ref 5.4.2.1) [REP4-040] were also considered relevant for the operational phase. Further explanation of this is provided below.</p> <p>Section 7.9.15 of the CoCP Part A (App Doc Ref 5.4.2.1) [REP4-040] relates to waste storage and segregation measures. Although included in the CoCP and therefore in the context of the construction phase, these measures would still be relevant for the operational phase, since the Proposed Development would include waste facilities for waste/rubbish generated during the operational phase. These waste streams would still be stored in designated areas, be appropriately segregated, be in suitable containers to prevent contents escaping and be isolated from surface drains and watercourses. In addition, for the disposal of such waste during the operational phase, the Applicant would still be required to adhere to relevant waste duty of care requirements, including appropriate storage, removal and disposal of domestic waste and any non-hazardous (in accordance with The Waste Regulations 2011, as amended, and s34 of the Environmental Protection Act 1990, as amended) or hazardous waste (in accordance with the Hazardous Waste Regulations 2005, as amended).</p> <p>Section 7.9.16 of the CoCP Part A (App Doc Ref 5.4.2.1) [REP4-040] relates to waste minimization. Although included in the CoCP and therefore in the context of the construction phase, waste would still be produced during the operational phase of the Proposed Development and the same mitigation measures could be applied to minimize this. Materials ordered for the operational phase such as diesel, odour control chemicals, polymer for sludge thickening and so on, along with associated waste streams (including biosolids, screenings, IBCs etc.) and these measures could be applied to minimise waste. There would also be opportunities for reuse and recycling of waste produced as part of the sewage treatment process, although this would be subject to other requirements such as exemptions from the Environmental Permitting Regulation 2016, as amended.</p> <p>In terms of how the implementation of these measures are secured, the Applicant notes that there are existing legislative requirements that require it to dispose of waste appropriately (i.e. The Waste (England and Wales) Regulations 2011 (as amended)) and to ensure that it does not create a pollution risk (i.e. the Environmental Protection Act 1990). In addition, the operation of the Sludge Treatment Centre (STC) would require an Industrial Emission Directive (IED) environmental permit (under the Environmental Permitting Regulations 2016, as amended). This requires permit specific management plans that describes sets of procedures to be followed at the STC, to minimise the risk of pollution from the activities covered by the IED permit. The Proposed WWTP will also require written management plans that includes, but not limited to, waste management controls. Both sets of management plans will formulate the wider environmental management system. Operational waste management is therefore secured by existing legislative requirements and the implementation of the environmental management systems.</p> <p>Section 5 of ES Chapter 16 Material Resources and Waste (App Doc Ref 5.2.16) [REP4-034] has been updated to clarify measures applicable for each phase and how these are secured. This has been provided at Deadline 5.</p>
17.2	CCoC	<p>Proposed WWTP – use of resources</p> <p>Please provide a response to ExQ1.17.18 [PD-008] as CCC and SCDC deferred to CCoC on this matter.</p>	No response from the Applicant
17.3	CCoC	<p>LIR</p> <p>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</p>	No response from the Applicant

ExQ1	Question to	Question	Response
17.4	Applicant, CCoC	<p>included, and provide justification for your suggestions.</p> <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>The criteria set in MWLP Policy 26 states the following:</p> <p><i>“Proposals for developments (including: golf courses and any other significant outdoor recreation facilities; and amenity bunds) which require the importation of significant quantities of minerals and/or inert waste, will only be permitted where it can be demonstrated that:</i></p> <ul style="list-style-type: none"> <i>(a) the proposal does not prejudice the restoration of mineral extraction sites;</i> <i>(b) there is a proven need for the material to be imported;</i> <i>(c) any mineral or waste imported will be used in a sustainable manner; and</i> <i>(d) the minimum amount of material is imported, consistent with the purpose of the Development”</i> <p>The Applicant notes that MWLP Policy 26 refers to the importation of significant quantities of minerals and/or inert waste; however, any material imported for landscaping is likely to comprise topsoil, which is classed as neither a mineral nor as inert waste. The importation of topsoil would therefore have no ability to prejudice the restoration of mineral extraction sites. The Applicant therefore believes that MWLP Policy 26 is not relevant in this context.</p> <p>In addition, the Applicant currently believes that the Proposed Development will achieve a cut fill balance and therefore the importation of material for landscaping is not anticipated to be required.</p> <p>Notwithstanding the above, should the importation of material for landscaping be required, this material would need to be handled in accordance with the CL:AIRE Code of Practice, which would be documented within a Materials Management Plan (MMP). Requirement 9 of the draft DCO (App Doc Ref 2.1) [REP4-003] confirms that no phase of the authorized development is to commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved by the relevant planning authority. An MMP is listed under the management plans that must accompany the CEMP (see Requirements 9(2)(a)(xii) and 9(2)(b)(xii)). In the unlikely event that any imported material required for landscaping comprised significant quantities of minerals or inert waste, then the relevant planning authority would have the ability to ensure MWLP Policy 26 is satisfied when discharging Requirement 9 of the DCO.</p>

ExQ1	Question to	Question	Response
18.1	Applicant, CCC, SCDC	<p>Assessment - residential receptor sensitivity To the Applicant, CCC and SCDC:</p> <p>a) Given that the extent of impacts from noise are based on a comparison of the potential noise impact compared to the existing noise baseline, and the significance of impact also assessed in relation to the LOAEL and SOAEL (and given that the proposed mitigation measures respond to the assessment findings), to what extent would reclassifying residential receptors as 'high sensitivity' rather than 'medium sensitivity' have on the findings in the ES?</p> <p>b) How would a reclassification of residential receptors to high sensitivity affect the findings of the ES regarding vibration?</p> <p>To the Applicant only:</p> <p>c) Please justify why you consider residential receptors to be of medium sensitivity, rather than of high sensitivity?</p>	<p>a) The Applicant confirms the extent of impacts from noise are based on comparison of potential noise impact with existing baseline noise levels and also with relevant LOAEL and SOAEL values, which have been used to identify the significance of effects.</p> <p>The designation of receptors as 'low', 'medium', 'high' or 'very high' sensitivity has been provided to align with the standard assessment methodology adopted in other ES chapters where sensitivity of receptors is defined using similar terminology.</p> <p>There is, however, no nationally adopted approach or guidance that defines the sensitivity of noise and vibration sensitive receptors. In general, standards and guidance that inform the methodology within ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [AS-036] (i.e. BS5228, BS4242, DMRB LA111) describe and give examples of noise sensitive receptors (which include residential dwellings, schools, healthcare facilities, etc.) but do not categorise receptor types into low, medium, high, or very high sensitivity. The sensitivity of different receptors has been reviewed using the criteria described in Table 2-7 of ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [AS-036] for the purpose of this assessment, which considers factors such as their ability to absorb change, their importance and value. Professional judgement is used to categorise receptor types based on these criteria set out.</p> <p>Examples of receptor sensitivity based on criteria set out are provided as follows:</p> <ul style="list-style-type: none"> • Noise and vibration has the potential to cause disturbance to medium sensitivity receptors and resulting impacts may result in significant effects. However, medium sensitivity receptors are expected to have a level of tolerance to change. Examples of medium sensitivity receptors include residential properties, educational facilities, health centres, community facilities and external spaces for recreational amenity. • High sensitivity receptors have a low tolerance to change where noise or vibration impacts are more likely to be disruptive, due to impacts at a lower level or for a shorter duration but subject to specific circumstances. Examples of high sensitivity receptors might include schools for hearing impaired students, a laboratory with vibration sensitive equipment, certain hospital wards or music venues. • Very high sensitivity receptors have a very low tolerance to change and also include high value locations. Examples of very high sensitivity receptors might include nationally significant landmarks or concert halls, receptors where significant disturbance would occur or where impacts may be detrimental to vulnerable occupiers due to noise and vibration. <p>Residential receptors within the study area for noise and vibration assessments are classified as medium sensitivity. No receptors within the study areas for noise and vibration assessments were identified to be high or very high sensitivity based on the criteria set out above.</p> <p>Whilst standards and guidance do not inform sensitivity classifications, they do provide a methodology for assessment of noise impacts and guidance for the assessment of significance. The receptor sensitivity and magnitude of impact scales are considered together within the assessment methodology to ensure the assessment of likely significant effects is consistent with methodology from relevant guidance and standards (i.e. BS 5228, BS 4142, DMRB LA 111).</p> <p>The magnitude of impact for sensitive receptors includes comparisons with existing baseline levels and effect level</p>

ExQ1	Question to	Question	Response
			<p>thresholds (LOAEL and SOAEL).</p> <p>In general, people are more sensitive to noise during night-time periods compared to daytime periods. The classification of sensitivity for receptors is, however, not changed for different times of day, but instead this tolerance is accounted for in selection of the LOAEL and SOAEL values. The tolerance to absorb change is included within assessment methodology through the selection of relevant LOAEL and SOAEL values for day and night-time periods. Night-time LOAEL and SOAEL values are lower compared to daytime values.</p> <p>The methodology from relevant standards and guidance includes comparison with existing ambient or background noise levels to determine the magnitude of impact. With all other factors unchanged, the magnitude of impact would be greater for a receptor located in a low ambient or background noise level environment compared to a high ambient or background noise level environment. This approach aligns with the methodology from relevant standards and guidance. Sensitivity of receptor has therefore not been adjusted based on whether receptors are located in rural or urban environments.</p> <p>On this basis, considering the magnitude of impact scales and sensitivity of receptor selected, the assessment and overall outcomes does not under or over-estimate the overall significance of effects but aligns with relevant guidance and standards (i.e. BS 5228, BS 4142, DMRB LA 111). This approach aligns with the NPSWW and NPSE in the use of relevant British Standards and other guidance for the assessment of noise and vibration impacts and determination of likely significant effects. The Applicant has reviewed other DCO applications and there is no consistency over the classification of residential receptors as medium or high sensitivity – both terms are used to describe residential dwellings. However, there is consistency over the criteria for significance linked to policy. The important outcome is the determination of significance and not where a receptor type is classified on a semantic scale.</p> <p>With all other aspects unchanged, reclassification of residential receptor sensitivity to high or very high within criteria set out in this assessment would increase the level of significance and the likelihood of significant effects. Without also adjusting of the impact magnitude scale, reclassification to a higher sensitivity would therefore overestimate significance and result in assessment methodology that would be inconsistent with industry best practice in the determination of significance.</p> <p>The Applicant recognises comments from CCC and SCDC Local Impact Reports, which overall agree with the outcomes of noise and vibration assessments, mitigation and conclusions. The Applicant and SCDC EHO discussed receptor sensitivity in a recent meeting (9th January 2024). The SCDC EHO confirmed the Local Authority overall agreed with the outcomes of the assessment and mitigation provided as described in ES Chapter 17: Noise and Vibration (App Doc Ref 5.2.17) [AS-036]. The EHO advised the selection of receptor sensitivity as medium was considered a difference of opinion, but not material to the outcomes of the assessment. This is recorded in the Statement of Common Ground with SCDC (App Doc Ref 7.14.11) in section 4 Noise and Vibration – subject to the implementation of agreed mitigation measures there will be no likely significant noise and vibration effects during the construction, operation or decommissioning of the proposed development.</p> <p>b) The same principles apply for vibration impact assessment with the exception that the magnitude of impact is</p>

ExQ1	Question to	Question	Response
			<p>based on comparison with LOAEL and SOAEL values, but not comparison with baseline vibration levels. The selection of receptor sensitivity and methodology, however, follows an equivalent approach as per for noise as stated above.</p> <p>c) As described above and with reference to examples provided, residential receptors have been classified to be medium sensitivity using criteria set out within the assessment methodology.</p>
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 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>No response from the Applicant</p>
18.3	Applicant	<p>Assessment – decommissioning processes CCoC's LIR [REP1-133] (7.19) raises a concern that temporary odour controls/scrubbers have not been assessed from a noise and vibration impact perspective within the ES. Please provide a response to this, including the likely impacts.</p>	<p>The Outline Decommissioning Plan (App Doc Ref 5.4.2.3) [REP4-044] states use of temporary odour control equipment/scrubbers may potentially be required for a duration of up to two weeks during decommissioning of the STC, Monsal, Digestion, and CHP area. Table 1-2 of ES Appendix 17.3 Construction Noise Assessment (App Doc Ref 5.4.17.3) [APP-135] provides plant noise impact assessment assumptions for the decommissioning phase for reasonable worst case plant and equipment. Odour control equipment is not included within Table 1-2, however, would generate equivalent or lower noise levels than plant items assumed and therefore noise levels at receptor locations and resulting impacts would be no greater than provided within assessment. In addition the odour control equipment/scrubbers would not be operated for an extended duration (i.e. not more than 10 in 15 consecutive days or, more than 40 days in a 6 month period), which reduces the significance of effect due to potential adverse noise impacts during this phase of works.</p> <p>Noise and vibration effects during decommissioning works are assessed to be not significant and no additional mitigation is required. On this basis, whilst the plant items assumed may vary subject to specific requirements during the decommissioning phase, the impact assessment results and likelihood of significance are considered to provide a reasonable worst case assessment and would not result in different impacts or new significant adverse effects.</p>
18.4	Applicant, SCDC	<p>Mitigation and monitoring - complaints At D1, SCDC requested a commitment (such as within the Community Liaison Plan) for the Applicant to notify SCDC's Environmental Health department of any complaints received other than through liaison meetings with third parties, and updates on any complaints received throughout the proposed construction period. Are you willing to accommodate this request and what (if any) agreement has been reached between the Applicant and SCDC regarding this matter?</p>	<p>The Applicant notes that Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-101] secures the provision of a noise and vibration management plan for each phase of the development, to be submitted and approved alongside the CEMP for such phase. Through this approval process, the Applicant will agree the complaint notification procedure and monitoring schedule with the District Council. The Applicant, therefore, considers that Requirement 9 of the dDCO (App Doc Ref 2.1) [AS-101] sufficiently addresses the need to monitor such complaints.</p> <p>This is also explained in paragraph 7.7 of the Code of Construction Practice Part A (App Doc Ref 5.4.2.1) [APP-068], which details matters the noise and vibration management plan must cover, including reference to the</p>

ExQ1	Question to	Question	Response
			Community Liaison Plan and monitoring. Requirement 9 also secures compliance with the Community Liaison Plan (App Doc Ref 7.8) [APP-209]. Requirement 8 of the dDCO (App Doc Ref 2.1) [AS-101] secures compliance with the Code of Construction Practice.
18.5	CCC	<p>Mitigation Within written summary of oral submissions made at ISH3 [REP4-090], you state on p12/13 that commitments made regarding noise and vibration need to be reproduced / expanded upon within the CEMP. Do consider that the draft CEMP [AS-057] needs to be updated prior to the close of the Examination, or would this information be sufficiently secured through R9 of the dDCO (provision of a detailed CEMP)? If you consider that the draft CEMP [AS-057] needs to be updated, please provide suggested wording for updates as appropriate.</p>	No response from the Applicant
18.6	CCC	<p>Monitoring and mitigation Para 8.19 of your LIR [REP2-043] suggests that the CEMP or alternatively a separate requirement imposed through the dDCO should be included to ensure that any adverse construction and decommissioning noise impacts would be mitigated and minimised to an acceptable level. Do you still consider this to be necessary? If so, please identify where the existing dDCO and supporting documents fail in your view to adequately mitigate construction and decommissioning noise impacts, and provide further justification for this stance.</p>	No response from the Applicant
18.7	Applicant	<p>Removal of the lime dosing facility The ExA notes your confirmation within [REP1-079] (19.19(e)) that the lime dosing facility would be removed as part of the decommissioning activities. Please confirm how its removal would be controlled through the dDCO or supporting documents (as it is not referred to in the outline decommissioning plan [AS-051])?</p>	<p>The temporary lime dosing plant will be either part of a self-contained vehicle or delivered on an HGV/LGV in a self-contained skid. In either option the lime dosing plant is a proprietary piece of equipment that will be delivered and removed like an excavator or item of plant like a pump. These units are self-contained including their own power source only requiring limited assembly and connection.</p> <p>The use of a temporary lime dosing plant will only be used for the very final part of sludge removal and may not be used at all. These rigs are used widely across industry and are not of the size or impact of a fixed lime dosing plant.</p>

ExQ2	Question to	Question	Response
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 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>Paragraph 5.1.5 of ES Appendix 8.14 Preliminary Odour Management Plan (App Doc Ref 5.4.18.4) [AS-106] uses the term 'expected' to provide flexibility in the equipment selected to measure odour and air pressure in the vent stack and shaft. Measurements are not odour mitigation; they are rather a method to monitor the performance of the dosing facility and it is likely that different equipment suppliers would provide different monitoring solutions. Paragraph 5.1.5 confirms that monitoring equipment at the dosing facility will comply with the Applicant's and the suppliers' documented standards for dosing facilities, of which the vent stack, located at Shaft 1 forms part of.</p> <p>Paragraph 3.5.2 of ES Appendix 8.14 Preliminary Odour Management Plan (App Doc Ref 5.4.18.4) [AS-106] informs that the ventilation facility will allow air to enter (typical operation) and exit (under extreme operating conditions†) the shaft. Odour mitigation is embedded in the design by incorporating a chemical dosing facility, which prevents septicity and reduces odour formation. The vent stack also includes a carbon filter to further reduce odour release.</p> <p>Further, the Applicant's Comments on Local Impact Reports (App Doc Ref 8.11) [REP2-036] provides consideration of 'planned neighboring development' as per Policy 18: Amenity Considerations of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2023) stating:</p> <ul style="list-style-type: none"> The Applicant would recommend a 15m separation buffer or 'cordon sanitaire' to the closest houses from vent stacks. Vent stacks already exist in the Cambridge catchment – similar in appearance to lamp posts, and can be located on streets or green spaces. The Applicant has not in the past had concerns associated with insufficient dispersion and dilution at high level with vent stacks of 10m height. However, consideration to maintain airflow around vents stacks would remain a requirement. <p>†Extreme operating conditions are most likely to include a high rainfall event when larger quantities of waste water enter the tunnel displacing air out of the tunnel</p>
19.2	CCoC	<p>Impacts from the proposed waste water transfer tunnel vent stack 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>The Applicant's Comments on Local Impact Reports (App Doc Ref 8.11) [REP2-036] provides consideration of 'planned neighboring development' as per Policy 18: Amenity Considerations of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2023) stating:</p> <ul style="list-style-type: none"> The Applicant would recommend a 15m separation buffer or 'cordon sanitaire' to the closest houses from vent stacks. Vent stacks already exist in the Cambridge catchment – similar in appearance to lamp posts, and can be located on streets or green spaces. The Applicant has not in the past had concerns associated with insufficient dispersion and dilution at high level with vent stacks of 10m height. However, consideration to maintain airflow around vents stacks would remain a requirement.
19.3	CCC	<p>Securing mitigation Within your written summary of oral submissions made at ISH3 [REP4-090], you state on page 15 that odour mitigation commitments should be reproduced and built upon where necessary and appropriate within the CEMP. Do you consider that the draft CEMP [AS-057] needs to be updated prior to the close of the Examination, or would this information be sufficiently secured through R9 of the dDCO (provision of a detailed CEMP)? If you consider that the draft CEMP [AS-057] needs to be updated, please</p>	<p>No response from the Applicant</p>

ExQ2	Question to	Question	Response
		provide suggested wording for updates as appropriate.	
19.4	Applicant, SCDC	<p>Mitigation To the Applicant: Within SCDC's LIR [REP4-092], para 13.13 suggests considerations for the dDCO – please confirm if these matters have been discussed with SCDC and if so, provide an update as to what agreement has been made.</p> <p>To SCDC: Para 13.13 of your LIR [REP4-092] suggests a 'requirement' for an outline commissioning plan. Does the submitted outline commissioning plan [AS-053] address this point? What (if any) additional requirements within the dDCO do you consider are necessary – please provide wording and justification (noting that R9 of the dDCO already includes a requirement for a detailed commissioning plan in accordance with the outline commissioning plan)?</p>	<p>SCDC 'Comments on Anglian Water's Response to the Local Impact Report' [REP4-092] submitted at Deadline 3 states 'SCDC notes the Applicant's stance / reasoning that they have conservatively modelled odour, however, SCDC still consider climate change impacts may affect odour influent.'</p> <p>The Applicant agrees that climate change impacts may affect odour influent and Chapter 18 Odour (App Doc Ref 5.2.18) [APP-050] has undertaken a conservative approach to the odour modelling assessment to robustly identify potential effects. Para 13.13 of the SCDC LIR was originally raised at Deadline 1 [REP1-139] where the initial 'requirement' for 'more detail on water, climate change' was raised. The Applicant's Comments on Local Impact Reports [REP2-036] confirmed that the design of the Proposed WWTP could easily manage changes in influent characteristics associated with climate change and further interventions are available should they be required in the future. Further details are available in Reference 13, Table 2-1, Applicant's Comments on Local Impact Reports [REP2-036].</p> <p>The Applicant has requested a further discussion with SCDC to identify if their concerns are now addressed and what is sought in a "requirement".</p>
19.5	Applicant, SCDC	<p>Mitigation To the Applicant: a) Some RRs (e.g. [RR-061]) request that the preliminary odour management plan [AS-106] includes formal commitments to corrective actions and a suitable escalation path if odours were to become unacceptable. The ExA note the complaints procedure contained within the preliminary odour management plan. However, there is no commitment within this to ensure corrective actions or an escalation path. Can the preliminary odour management plan [AS-106] or community liaison plan [REP4-078] be updated to provide more clarity / reassurance in this regard?</p> <p>To SCDC: b) Do you consider the complaints procedure identified within the application documents to be satisfactory? If not, please provide suggested amendments as appropriate.</p>	<p>The process flow diagram set out on page 35 (Figure 4.1) of the Preliminary Odour Management Plan (App Doc Ref 5.4.18.4) commits the Applicant to carrying out immediate on-site actions and to escalate to the relevant parties where required during operation, these parties include the EHOs for the council and the Environment Agency. It should be noted that the procedure in Figure 4.1 is adopted by operational sites across the Applicants region. The Applicant believes this to be of sufficient detail within the Preliminary Odour Management Plan and does not believe any further additions are required. The detailed Odour Management Plan which will be regulated by the relevant Local Planning Authority will include specific escalation points based on Table 6-1 of Section 6 of 5.4.18.4.</p> <p>The Community Liaison Plan is a construction management plan (App Doc Ref 7.8 [REP4-078]) and therefore will only deal with complaints which arise from construction activities associated with the Proposed Development. Construction activities are not anticipated to give rise to odour. However, should a complaint be received, they would be dealt with via the Enquiries and Complaints Procedure which will be agreed with the Relevant Planning Authority and incorporated into the final Community Liaison Plan for approval in accordance with requirement 9 of the draft Development Consent Order (App Doc Ref 2.1). The Applicant does not therefore believe that the Community Liaison Plan would be a relevant document for making formal commitments.</p> <p>Any complaints associated with the existing Cambridge WWTP prior to the surrendering of the Environmental Permit will be dealt with in accordance with the existing complaints procedure regulated by the Environment Agency.</p>
19.6	Applicant	<p>Assessment – decommissioning processes Within CCoC's LIR [REP1-133] (7.19) it is stated that temporary odour controls/scrubbers have not been assessed from an odour impact perspective within the ES. CCoC also queries the impacts from odour during the cleaning processes. Please provide a response to this, including the likely impacts / effects.</p>	<p>In relation to the assessment of temporary odour control devices the Applicant refers to paragraph 4.4.5 to 4.4.13 of ES Chapter 18 Odour (App Doc Ref 5.2.18) [APP-050], which provides an assessment of odour impacts during the decommissioning of the existing Cambridge WWTP and includes the application of mitigation measures contained within the Outline Decommissioning Plan (App Doc Ref 5.4.2.3) [REP4-044]. The Applicant notes that the use of the temporary odour controls/scrubbers is to mitigate potential temporary short term odour release and that these are not a source of odour. Paragraph 4.4.13 of ES Chapter 18 Odour (App Doc Ref 5.2.18) [APP-050] concludes that the likely residual odour effect is expected to be negligible and is not significant.</p> <p>Paragraph 4.4.2 of Chapter 12 Health (App Doc Ref 5.2.12) [APP-044] assesses the changes to health and wellbeing due to an</p>

ExQ2	Question to	Question	Response
			increase in noise, air quality, dust, <u>odour</u> , traffic and visual effects and concluded that 'A negligible impact on health and wellbeing is anticipated as there will be no substantial change to the quality of the environment'. This conclusion considered the operation of the scrubbers and other odour controls during decommissioning. There was not considered to be a health pathway from these controls to receptors. The odour controls are considered to be operated and maintained by competent workers applying standard Health and Safety protocols and there is not considered to be any pathway to residential receptors as activities are not expected to extend outside of the existing Cambridge WWTP. Paragraph 4.4.4 concludes that the overall effect, taking odour impacts into account, is not significant.
19.7	SCDC	Control of odour through dDCO and Environmental Permitting Please confirm whether you require any further clarification from the Applicant regarding control of odour through the dDCO and Environmental Permitting process?	No response from the Applicant
19.8	Applicant	Environmental Permits Please provide an update on Environmental Permitting regarding odour management.	The Preliminary Odour Management Plan [AS-106] is secured by Requirement 21. In addition to the Preliminary Odour Management Plan, the Applicant will be required to submit an approved management plan that will form part of the Environmental Permit requirement. The Environment Agency will review that plan as part of the permit application. The documents will be the same but with different approval mechanisms. One, the planning regime within the Relevant Local Planning Authority and the other the National Permitting team. The Applicant has updated the Preliminary Odour Management plan (App Doc Ref 5.4.18.4) to include reference to the vent stack location and confirmation that it will be managed operated and inspected in accordance with that plan. The location of the vent stack for the interception shaft has also been included within the revised Design Code (App Doc Ref 7.17)

ExQ1	Question to	Question	Response																																		
20.1	Applicant	<p>Construction traffic</p> <p>Whilst your response in relation to the carbon assessment is noted, please provide the information requested in ExQ1.20.56 c) [PD-008]: Please provide an estimate of any additional mileage and the additional carbon emissions associated with that additional mileage that would be travelled by construction vehicles travelling via the A10 and Waterbeach towards temporary accesses 7, 8 and 9 to avoid Horningsea High Street – para 3.8.20 of ES Chapter 2 [APP-034] suggests that the route via the A10 might be in the region of 7 miles.</p> <p>Please also clarify the distance; during ISH3 [EV-007d] the Applicant noted that a direct route via Horningsea would be 5km compared with 2km from the A10.</p>	<p>In reference to question EXQ1 20.56 c) (which states: “Could the potential for cumulative impact be reduced / avoided by routing construction through Horningsea?”), the cumulative effects are as a result of the combination of Waterbeach New Town and Waterbeach Railway Station construction traffic as set out in section 4.2.15, Table 4-1 of ES Chapter 22 Cumulative Effects Assessment (App Doc Ref 5.2.22) [REP2-009]. These cumulative effects would not be reduced or removed if vehicles for the Waterbeach pipeline construction sites on Clayhithe Road 7,8 and 9 (note that these are sites CA16, COA9 and CA20 on Clayhithe Road, shown in Access & TRO plans, AS-154) were routed through Horningsea instead of Waterbeach. The construction traffic for Waterbeach pipeline construction access points CA16, COA9 and CA20 uses the Car Dyke Road junction of the A10, whereas the construction traffic for the Waterbeach New Town, Waterbeach Railway and Waterbeach pipeline construction use the Denny End Road junction with the A10. Hence the reasonable worst case of the three developments being constructed simultaneously remains.</p> <p>The Applicant can clarify that the distance along the A10, measured from junction 33 Milton Interchange, via Waterbeach ranges from 6 to 7.5km to sites CA16, COA9 and CA20; and 4.2 to 5.7km along the A14 and via Horningsea, measured from junction 33 Milton Interchange. The difference to each specific site via the different routes is summarised in the table below, as is the equivalent tCO2e per day of carbon emissions. The assessment has been based on peak HGV (45 per day) and workforce numbers (20 per day)</p> <table border="1"> <thead> <tr> <th rowspan="2">Site</th> <th colspan="2">Via Waterbeach</th> <th colspan="2">Via Horningsea</th> <th colspan="2">Emissions difference between route via Waterbeach compared to via Horningsea</th> </tr> <tr> <th>km</th> <th>tCO2e/d</th> <th>km</th> <th>tCO2e/d</th> <th>km</th> <th>tCO2e/d</th> </tr> </thead> <tbody> <tr> <td>7</td> <td>6</td> <td>0.29</td> <td>5.7</td> <td>0.28</td> <td>+0.3</td> <td>+0.01</td> </tr> <tr> <td>8</td> <td>6.5</td> <td>0.32</td> <td>5.2</td> <td>0.25</td> <td>+1.3</td> <td>+0.06</td> </tr> <tr> <td>9</td> <td>7.5</td> <td>0.37</td> <td>4.2</td> <td>0.21</td> <td>+3.3</td> <td>+0.16</td> </tr> </tbody> </table> <p>The text to avoid Horningsea High Street – para 3.8.20 of ES Chapter 2 [APP-034] is in reference to if a diversion route via the A10 would be required if Horningsea Road required temporary closure and people from Horningsea or Fen Ditton were required to use the A14/A10 instead of Horningsea Road.</p> <p>In response to ISH3[EV-007d], the Applicant can confirm the distance of the construction sites from the A10 (via Waterbeach) are 2.3, 2.8 and 3.39 km to sites 7, 8 and 9 respectively. The distance of the construction sites from the A14 (via Horningsea) is 2, 2.5 and 1.5km to sites 7, 8 and 9 respectively.</p>	Site	Via Waterbeach		Via Horningsea		Emissions difference between route via Waterbeach compared to via Horningsea		km	tCO2e/d	km	tCO2e/d	km	tCO2e/d	7	6	0.29	5.7	0.28	+0.3	+0.01	8	6.5	0.32	5.2	0.25	+1.3	+0.06	9	7.5	0.37	4.2	0.21	+3.3	+0.16
Site	Via Waterbeach		Via Horningsea		Emissions difference between route via Waterbeach compared to via Horningsea																																
	km	tCO2e/d	km	tCO2e/d	km	tCO2e/d																															
7	6	0.29	5.7	0.28	+0.3	+0.01																															
8	6.5	0.32	5.2	0.25	+1.3	+0.06																															
9	7.5	0.37	4.2	0.21	+3.3	+0.16																															
20.2	Marshall Group Properties (Cambridge City Airport)	<p>CoCP / Wildlife Management Plan</p> <p>Your WR [REP1-161] said that you are broadly satisfied with the proposed arrangements in the CoCP in respect of the Wildlife Hazard Management Plan. Do you consider that any amendments need to be made to this document for you to be fully satisfied? If so, please set out the amendments.</p>	<p>The Applicant met with the Marshall Group Properties (Cambridge Airport) on 6 February 2024. The Applicant understands that the stakeholder is in agreement with the Wildlife Hazard Management Plan (App Doc Ref 5.4.8.17) which is now updated to acknowledge the CAA as the regulating body not EASA and agrees with the inclusion in the Consents and Other Permits Register (REP1-047) with the appropriate crane licences. The Stakeholder has confirmed that they will inform the Planning Inspectorate directly of this agreement.</p>																																		
20.3	Network Rail	<p>Railway safety</p>	<p>The Applicant has confirmed with the relevant stakeholders regarding AIL crossing the level crossings and has satisfied itself</p>																																		

ExQ1	Question to	Question	Response
	Infrastructure Limited	Are you satisfied with the proposed construction routes and their interface with level crossings?	that there is no issue of note regarding either routing, frequency or type of vehicles that are planning to travel over the level crossings.
20.4	Applicant	<p>Vehicle parking and staff occupancy</p> <p>You have stated that car parking would be provided at a ratio of approximately two spaces for each member of staff [REP1-079; 20.89 c)]. During ISH3 [EV-007f], the ExA posed a question in relation to untested potential impacts arising from any potential increased number of staff in the Gateway Building, facilitated by any surplus car parking provision. You indicated that a 'worst case scenario' had been tested.</p> <p>However, you state in [REP1-079; 20.89 c)] that The number of car parking places for operational staff based at the proposed site under the dDCO is 46, representing the maximum number of vehicle movements assessed in the environmental statement (92). This includes 30 parking spaces associated with the WROL and water resources operations described above. As discussed at 1.25 below, further parking spaces are proposed for cars belonging to tanker drivers (6), additional operational visitors (2) and contingency spaces (5). A further 20 spaces, outside of the bunded area, are provided for "by invitation" visitors to the Discovery Centre. (The ExA notes that the stated numbers do not accord with parking provision shown on the submitted drawings, e.g. [APP-025] illustrates 13 spaces in the Visitors' Car Park).</p> <p>The outline OLTP [REP4-072; Table 4-2] indicates that there would be 30 office worker car / LGV movements during the 'AM peak' (0800-0900) and 30 movements in the 'PM peak' (1700-1800). The OWTP also indicates an intention to promote non-car usage such that a maximum of 55% of staff would drive to / from the proposed WWTP by 2033 compared with a baseline of 72% [APP-149; Table 8.2].</p> <p>It appears to the ExA that, whether or not the aforementioned modal shift is fully achieved, there could be surplus car parking. Based on total parking provision (including visitor parking spaces), please explain and include clear references to application documentation to support your responses:</p> <p>a) how many spaces would be occupied by staff if the maximum number of vehicle movements assessed in the environmental statement occur;</p> <p>b) how many spaces would be occupied by staff if there is no change in staff numbers but the OWTP's 2033 modal shift target is achieved;</p> <p>c) if any unoccupied spaces were all occupied by additional office workers' cars, how many additional journeys would occur during the 0800-0900 and 1700-1800 peaks;</p> <p>d) where the effect of any such additional peak traffic associated with additional office workers has been quantified or assessed in the Environmental Statement and / or the associated Transport Assessment;</p> <p>e) whether the draft DCO includes any provisions restricting the number of office workers in the proposed Gateway Building;</p> <p>f) whether the draft DCO includes any provisions that would prevent unoccupied car parking spaces from being used to accommodate additional</p>	<p>The Applicant has now aligned all the documents to include for:</p> <ul style="list-style-type: none"> • 6 No. AW WWTP Operational and maintenance staff travelling to/from work • 2 No. AW Technical/managerial Visitors (weekdays and out of peak only) • 2 No. Deliveries & contractors supporting the WWTP operation (waste water and sludge, consumables) • 6 No. Tanker/ HGV drivers using the office facilities and driving related to the WWTP operations • 30 No. Office workers using the facility daily (RES/WROL) and other AW staff such as Water resources – likely possible maximum attendance • 7No HGV parking for sludge and cake transportation • 10 No. Parking for AW Network Technician vans • 10 No. Visitors to the Discovery Centre and AW meetings • 2 No. Visitor disabled parking spaces • 1 No Coach space <p>The proposal also includes for 3 No. HGV trailer parking spaces.</p> <p>The Applicant notes that 20 spaces outside of the bunded area has not been requested in the application, for clarity the parking spaces numbers outside of the bunded area that has been requested are 10 No. visitors, 2 No. Disabled spaces and 1 No. coach space. The applicant's drawing [APP-025] Design Plans - Highways and Site Access is indicative that shows the 13 car parking spaces as drawn verses the requested 12 as well as the singular parking space for a coach. The spatial representation of the area is correct and allows for adjustments to the markings, for example; to the configuration to be amended or the widening of bays to improve visitor accessibility.</p> <p>a) The assessment presented at Deadline 3 was based on the reasonable worst-case assumption that only staff working at the proposed WWTP would travel in the peak hour, with other visitor and operational traffic occurring outside of the peak hours. The assessment was therefore based on maximum of 46 vehicles arriving in the morning peak hour and 46 vehicles departing in the evening peak hour, based on all available staff parking spaces being occupied. The assessment has since been updated to reflect a busiest peak hour scenario where all 68 car parking spaces for staff, visitors and operational vehicles are occupied in the peak hour. This would generate a maximum of 68 vehicles arriving in the morning peak hour and 68 vehicles departing in the evening peak hour. The Applicant maintains that, the reasonable worst case is likely to constitute 46 number arriving in the peak hours and the remaining operational staff and visitors would arrive outside of the peak hours.</p> <p>b) With the modal shift applied, 55% of staff would travel by car on their own generating a total of 38 vehicle trips arriving in the morning peak hour and 38 vehicle trips departing in the evening peak hour. This represents the target reduction of 17 percentage points from the estimated baseline single-occupancy car mode share (82%). This would reduce the total number of parking spaces required at the proposed WWTP by 30 spaces, from 68 to 38 spaces. It should be noted that this will be reaffirmed and agreed between the applicant and CCoC as per of the commitments set out in the OWTP and secured by requirement 9 of the dDCO. This will be for those using the Discovery and Gateway Building users and not the operational team or Network Technician vans who require their vehicles to perform their operations.</p> <p>c) As noted in response to point a), the Applicant has updated the assessment to reflect the worst-case scenario where all 68 car parking spaces for staff, visitors and operational vehicles are occupied in the peak hour to ensure that the maximum number of peak hour vehicle movements has been tested).</p> <p>d) Answered in response to a).</p> <p>e) There are currently no restrictions other than by the self-determining maximum size of the building that was sized for the current number of staff members using the existing Cambridge WWTP.</p>

ExQ1	Question to	Question	Response
		<p>(over and above the number assessed in the ES) workers' vehicles; and</p> <p>g) whether the draft DCO includes any provisions to prevent non-visitors from using visitor parking spaces and, if so, how any such provisions would be enforced.</p>	<p>f) The dDCO does not currently have a provision to prevent parking in the unoccupied spaces following the modal shift. The Applicant is committed to promoting sustainable transport and implementing the proposed modal shift. The Applicant has to make sure its staff can attend their place of work all year round as many of its operations including WROL may need to respond to unplanned incidents and are required to meet at the proposed works no matter the weather or lighting conditions. It may be impractical to physically reduce the number of car parking spaces to the modal shift targeted numbers. However, the Applicant would seek to reduce traffic numbers by providing sheltered bike parks, providing good greenway access and internally promoting car shares.</p> <p>g) The dDCO currently does not provide any provision to prevent non visitors parking in the visitor spots. This can be managed by signage on those spaces indicating visitors only and inductions to the Applicants personnel if required but also is self-determining as in the answer to e).</p>
20.5	Applicant	<p>EV charging provision CCoC states [REP2-040; 20.93] that details of EV charging should be presented in the Operational Workers Travel Plan [REP4-070] as well as in the Outline Operational Logistics Traffic Plan [REP4-072] prior to the determination of the DCO application. Do you agree with this? If so, please update the documents accordingly. If not, why do you disagree?</p>	<p>Electric vehicle provision and the proportion of spaces provided with active and passive can be found in both section 4.1.9 of the ES Appendix 19.10 Operational Logistics Travel Plan (App Ref 5.4.19.10) and section 3.2.3 of the ES Appendix 19.8 Operational Workers Travel Plan (App Ref 5.4.19.8) provided at Deadline 5.</p>
20.6	Applicant, National Highways	<p>Evidence supporting National Highway's decision relating to permanent access options In [REP1-078; page 138] the Applicant states that During the consultation process to identify a suitable access for the proposed WWTP the Applicant proposed Option 3 which consisted of an access directly off the A14. This option was not acceptable to National Highways due to safety concerns and non-policy compliance (DfT Circular 01/2022, paragraph 20) so this option was not pursued. Please explain the evidence that was presented to National Highways to inform this conclusion; and In the absence of modelling based on up-to-date traffic information, how could a conclusion on the most appropriate access solution be reached with any certainty?</p>	<p>The Applicant held a series of Technical Working Group (TWG) meetings with National Highways and the Local Highway Authority to review the site access optioneering and assessment undertaken by the Applicant in relation to the site access options. The scope and programme of these meetings was agreed by the TWG members, and the sequence of these meetings is set out and agreed in Appendix 1 of the Statement of Common Ground between the Applicant and National Highways submitted at Deadline 4.</p> <p>The Applicant presented during the TWG meetings the initial analysis and appraisal of the access options for the main site access and discussed 7 potential variables. In the sifting of this list of 7 options down to a short list of 4, it was clear that there was a viable option available for access directly from the A14 in the form of Options 1a) and 1b), access off junction 34 (Fen Ditton).</p> <p>An appropriate level of modelling was carried out as part of the TWG process. It was clear that a viable access option was available from Junction 34 in the form of Options 1a and 1b. Notwithstanding this, Option 3, for a new access point was progressed to public consultation to obtain further views. Highways England (now National Highways) responded negatively to this option (Option 3) in response to this consultation and advised Access Option 3 would be contrary to policy and therefore National Highways would object to this proposal. This was set out in an email to the Applicant on 12th August 2021. Please note, at the time of the discussions, the Department for Transport (DfT) circular 02/2013 'The strategic road network and the delivery of sustainable development' was the in-date policy.</p> <p>Notwithstanding this, further assessment was undertaken on these four final site access options to determine a single option to take forward to EIA and Transport Assessment (TA). As part of this further assessment, a capacity assessment was undertaken of the routes to give an indication of potential capacity constraints to help with the optioneering. It was outlined to the TWG at the time that further assessment as part of the TA was required to fully ascertain if any mitigation was required. The baseline used available historic data for each junction including; Junction 33 – (Milton Interchange) – 2021 data obtained from Waterbeach Development TA (S/0559/17/O) Junction 34 and Horningsea Road – 2013 Traffic Flow data obtained from Wing Development TA (S2682/13OL) A14 Flow – 2013 Dft counts – between junction 33 and junction 34 & junction 34-35.</p> <p>The Applicant presented to the TWG final optioneering assessments from 'LINSIG' and 'TRL software Junctions' to reflect both am and pm peak traffic flows for construction scenarios, operational opening year and plus 10 years assessment of operational</p>

ExQ1	Question to	Question	Response
			<p>future year. Both the peak construction period and opening operational year assessments for Options 1a and 1b were shown to be within capacity. It was outlined to the TWG that further assessment as part of the TA would be required to fully ascertain any mitigation required.</p> <p>Option 2 Modelling of the A1303 / High Ditch Road Junction outlined that the junction had significant capacity constraints, additionally the Option required more extensive mitigation measures including a new NMU bridge over the A14 and further design work was necessary to determine if Option 2 would be a viable option.</p> <p>Option 3 would have limited impact on the capacity of the local road network, however, the spacing available between Junction 34 and 35 were considered to be insufficient for DRMB standards. DfT circular 02/2013 policy strongly disfavours access option 3.</p> <p>National Highways confirmed that non-compliance without a strong justification would present a risk that the proposal would be refused and there was sufficient information already available to make an assessment.</p>
20.7	Applicant, CCoC	<p>Pedestrians 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 modes other than the private car?</p>	<p>The issue of lighting the combined pedestrian/cycle path serving the proposed WWTP has been discussed with Cambridgeshire County Council. To minimise impacts on green belt and on biodiversity, the Applicant does not propose to light the path. The Applicant believes that the path could be safely used, however it acknowledges that its use may not be attractive to workers travelling to and from the site during winter mornings and evenings.</p> <p>The optimal balance between environmental impacts and user amenity will be explored with the local planning authority during the detailed design approval process as part of the overall scheme lighting arrangements. The Applicant has amended the lighting design strategy (App Doc Ref 5.4.2.5) to reflect this intention and discussed this approach with Cambridgeshire County Council. Agreement with the approach will be logged in the Cambridgeshire County Council Statement of Common Ground (SoCG) (App Doc Ref 7.14.4). The lighting design strategy amendments include the reference to potential options for surface level stud lighting (the approach adopted by the Cambridgeshire Greenway proposals) or low-level, motion sensor triggered lighting, mounted on bollard structures.</p>
20.8	Applicant	<p>Equestrian crossing of A14 overbridge In the draft SoCG with National Highways [REP4-080] it is stated that It is agreed (meeting 16.01.2024) that this parapet height should be 1.8m compliant with both cyclist and equestrian use. This modification is made following stakeholder feedback. How is this secured in the dDCO?</p>	<p>The Applicant has amended the Design Plan – Highways (Application Reference 4.11.1 and 4.11.3) to show the parapet height. Revisions C02 of these plans have been submitted at Deadline 5. Work No. 1 provides for highway works, the general arrangement of which is shown on sheet 1 (4.11.1) of the Design Plans – Highways. The Applicant has also included a new Part 24 (parapet over the A14) of Schedule 14 (parameters) in the dDCO confirming that the height of the parapet is 1.8m</p>
20.9	Applicant	<p>SoCG with National Highways Some matters are coloured amber and marked as 'low'. This combination is not explained in the table on page 2 of [REP4-080] – please explain what 'amber / low' represents.</p>	<p>The matters coloured amber and marked 'low' should be coloured green. The Applicant will correct this error with the updated SoCG with National Highways at Deadline 6.</p>
20.10	Applicant, CCoC	<p>Use of Automatic Number Plate Recognition (ANPR) geofencing 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. To the Applicant: Why has this change been made; and Would non-Heavy Goods Vehicles (HGVs) (including Light Goods Vehicles (LGVs) and employees'/visitors' cars/vans) be monitored / geofenced? If so, how? To CCoC: Please provide your opinion on this change to the proposed method of vehicle monitoring / limiting vehicle movements to specific routes.</p>	<p>This was an omission in the submission as geofencing of the operational HGVs is what we have publicly consulted on and is the most effective way to stop HGVs using roads and accesses they are prohibited from using. The geofencing is applied to both the Applicant's vehicles and those of its contractor HGV's. The geofencing system is a proactive management system for vehicles that gives both visual/audible warnings in the cab for the driver to know where not to go as well as accurate reports on any infringements that can be investigated by the Applicant's team and rectifying measures taken.</p> <p>LGVs and cars are not to be monitored in operation as there is no restriction on their movements. There may also be some operational access needed to get to customers in the prohibited area that may be needed for the Applicant to carry out its duties as a waste water services provider.</p> <p>ANPR will be used in the construction phase for all vehicles with an onsite Logistics Manager reviewing reports and taking immediate action where appropriate, as described in the Construction Traffic Management Plan (App Ref 5.4.19.7).</p>

ExQ1	Question to	Question	Response
20.11	Applicant	<p>Network technician vans Application documentation has been amended at D4 to include reference to 'Network Technician Vans' for which 10 parking spaces would be provided (e.g. Table 6-1 of [REP4-072]). Please confirm whether a 'Network Technician' a field-based role; Please explain the work (if any) that Network Technicians would be undertaking on the proposed WWTP site; Outline OLTP [REP4-072] Table 6-1 indicates 20 Network Technician Van movements per day but Table 4-2 under the heading 'WWTP, Network Tech Vans, office workers (cars and LGV)' refers to 22x2 (morning and evening) movements (i.e. 44 movements) which would be out-of-hours / overnight. Please clarify which vehicles would be making the additional 24 movements; If Network Technician Vans are parked on the site overnight, why would they need dedicated parking spaces – could they use spaces that are unoccupied overnight because they are only otherwise used by daytime occupiers of / visitors to the site?</p>	<p>As well as treating wastewater from our customers, the team at Cambridge WWTP also operate and maintain the local Cambridge wastewater network. This is where the provision for our Network Technicians vans is required. The Network Technician role is a field-based role. These personnel take their vans home and only visit the WWTP before or after the peak times and will only visit the WWTP during the day for meetings or operational requirements that are difficult to predict. These vans have now been included in the traffic assessment arriving or leaving during the peak traffic periods to cover any eventuality on the times of their arrival and departure. There is a requirement to park their vans on site whilst accessing the stores, washing and messing facilities or for team briefings.</p> <p>The Network Technician vans may need to respond to unplanned incidents that happen throughout the night. This may be in addition to a normal working day, therefore require vans to be parked at the proposed WWTP for this period. Also, there are occasions when attendance is needed for periods of the day for briefings, training or when attending the proposed WWTP to gather parts or information on the network that services the Cambridge region. As the Applicant is prohibiting workers from parking in the visitor spaces outside of the earth bank, provision for all the Network Technician vans will be needed due to the likelihood of them all being at the proposed WWTP at the same time.</p>
20.12	CCoC	<p>Local diversion of Horningsea Road With reference to the drawings at Appendix E of [REP4-087] please provide your views in respect of the 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>	<p>This type of road crossing with a pipeline is something that is done almost daily by the Applicant in its normal capital delivery programme.</p>
20.13	Applicant, CCoC	<p>Abnormal Indivisible Load (AIL) access to Waterbeach Pipeline construction corridor 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 discussion at ISH3 that AIL would only travel to the site of the proposed WWTP via J34. <u>To the Applicant:</u> Please clarify the situation and provide a clear and definitive position on AIL routing. If AIL would cross Clayhithe Bridge, how would it reach Clayhithe Bridge – via J34 and Horningsea or via the A10 and Waterbeach? <u>To CCoC:</u> Please provide your observations on this apparent change to AIL routing. Are you satisfied that AIL could be routed to CA20?</p>	<p>The Applicant has reviewed the type of vehicles required for the Waterbeach pipeline construction and the Horizontal Directional Drilling (HDD) Rig will be above the 44 tonne threshold that defines an Abnormal Indivisible Load (AIL).</p> <p>The Applicant can confirm that the construction routes plans have been updated to include the Waterbeach construction access points and the main construction site access at Junction 34. This is now shown on plan 4.11.7 Design Plans - Highways. The plan has been added to both the Transport Assessment [App Doc Ref 5.4.19.3] figure appendices, and CTMP [App Doc Ref 5.4.19.7] at figure 4.2.</p> <p>To access the worksites on Clayhithe Road, the AIL routing is from the A10 and follows Car Dyke Road, Station Road and Clayhithe Road, crossing the Clayhithe Bridge. The Applicant has had confirmation from CCoC regarding the weight limit of that bridge and it is suitable for traversing by an AIL</p>

ExQ1	Question to	Question	Response
20.14	Network Rail Infrastructure Limited	Level crossings At Appendix F of [REP4-087] it is stated that Bannold Road level crossing in Waterbeach has a safe height of 4.9 metres and that the overall height of an AIL vehicle is approximately 4.8 metres. Do any special arrangements need to be made in light of this?	The Applicant has confirmed with the relevant stakeholders regarding AIL crossing the level crossings and has satisfied itself that there is no issue of note regarding either routing, frequency or type of vehicles that are planning to travel over the level crossings.
20.15	National Highways	Exclusion zone for SRN Are your concerns relating to potential crane falls on the SRN, as mentioned during ISH3, addressed by the drawing at Appendix J of [REP4-087]?	Not for the Applicant

ExQ1	Question to	Question	Response
21.1	EA	<p>Flood Risk Assessment (FRA) Please confirm whether the Evidence and Risk team have reviewed the modelling to support the updated FRA (referred to in your submission [AS-175]), and if so, whether the modelling is considered to be acceptable? If not, please set out clearly why. Additionally, do you consider the climate change allowances with the updated FRA to be acceptable?</p>	The Applicant can confirm that the Environment Agency have reviewed the updated modelling. The outcome of the modelling is the subject of further discussion between The Applicant and the Environment Agency to identify of any further steps are needed.
21.2	Applicant	<p>FRA Please confirm which additional scenario suggested by the EA in its submission [AS-175] you intend to provide as part of the updated FRA? When will this modelling and a newly updated FRA be submitted to the EA and into the Examination?</p>	<p>In [AS-175], the Environment Agency state <i>"We consider that either another baseline scenario should be run with predicted future growth included or another post-development scenario should be run without planned future growth included. This would allow the baseline and post-development results to be directly compared and would allow the impact of the new WWTP and outfall on local flood risk to be determined. If possible, existing discharges from the Waterbeach outfall should be included in the baseline scenario."</i></p> <p>The Applicant has run another baseline scenario with predicted future growth included. This includes Waterbeach discharges. The model including the new scenario has been submitted to the Environment Agency in February 2024. The Applicant has now had further comments back from the Environment Agency on this modelling in relation to the population equivalent figure that the modelling represents and any mitigation measures that may be required. The Applicant is clarifying this in further discussions with the Environment Agency and how this will be added into the updated FRA. The Applicant will therefore now submit the FRA (App Doc Ref 5.4.20.1) to the Environment Agency for review between Deadline 5 and ISH3.</p>
21.3	EA	<p>Licences and permits At D1 [REP1-152], you state that Dewatering is mentioned as a required activity for the site. But, it is not covered in Section 4.3 Licences and Permits. Dewatering is now a licensable activity and whilst there are some exemptions to this, we would expect the applicant's environmental statement to consider any requirement for dewater abstraction licences and make the case as to why the proposed activities qualify from the licensing exemptions. Do you still consider that this matter needs to be addressed by the Applicant, noting that the Applicant states in their response to the ISH3 Action Points [REP4-087] that There is no additional need for a "dewatering licence". A water abstraction licence will be required pursuant to the Water Resources Act 1991 from the Environment Agency for the abstraction of water for the construction works and this is already included in the Consents and Other Permits Register [REP1-047]?</p>	The Applicant confirms and has discussed with the Environment Agency that the abstraction licences listed in the Consents and Other Permits Register [REP1-047] are appropriate and cover all the temporary abstraction permits that will be necessary during the construction period. Both parties are aware that until nearer the time it is difficult to determine if they will be necessary because the estimated abstraction is over the threshold, but the Applicant and the EA have agreed that the Applicant will submit the Application forms to the Environment Agency's National Permitting team at Deadline 5 with the best estimate of date, time and amount expected to be abstracted so this approval can be in place and then adjusted as necessary. The Applications will also including the impounding licence for the work around the outfall in the River Cam as listed in Consents and Other Permits Register [REP1-047].
21.4	Applicant	<p>Water abstraction Some WRs [e.g. REP1-153 and REP1-155] express concerns regarding the impact of the Proposed Development on water stressed areas and the need to for Cambridge Water to reduce abstraction rates (which IPs suggest needs to be halved). SHHG's WR [REP1-171] states that the Applicant has applied for an Interim Revised Discharge Permit for the existing works, at c 45,000 m³ per day and a Final Discharge Permit for the new works at 55,000m³ per day both for a nominal date of 2027. SHHG states that the Interim Permit application is for well above the existing permitted discharge of 37,330 m³/d, noting that the existing permit in terms of volume is being breached and has been for several years. Please provide a response to these points, and explain how the Proposed Development would ensure that required abstraction rates set by the EA would be achieved and ensure that it would not place additional pressure on areas</p>	This question is conflating two unrelated issues. Abstraction rates are determined by the relevant abstraction licenses / environmental permits, which in this location are the responsibility of Cambridge Water. The Proposed Development (and its future growth) responds to the elements of that abstraction which arises for treatment within the plant's catchment. The Proposed Development itself does not significantly increase likely abstraction rates, the water use of the proposed WWTP is described in the ES Chapter 2: Project Description (App Doc Ref 5.2.2) [REP4-022].

ExQ1	Question to	Question	Response
		of existing water stress.	
21.5	EA	<p>Water supply Do you consider that the information provided by the Applicant at D2 [REP2-037] regarding domestic/sanitary water use (responses to question 21.41), which states that the water use between the existing and proposed WWTP would be similar, sufficiently addresses your concerns regarding this matter? Do you have any outstanding concerns regarding water abstraction and impacts on water stressed areas?</p>	No response from the Applicant.
21.6	National Trust, NE, CCoC	<p>Outline water quality monitoring plan 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 this to be the case and any suggested amendments to the document with justification.</p>	The Applicant has shared the updated outline water quality monitoring plan [REP2-028] with Natural England, The National Trust and CCoC. No further comments have yet been received.
21.7	NE	<p>Outline water quality monitoring plan [REP2-028] Do you still have concerns regarding groundwater protection and impacts on highly stressed water resources? If so, please set out clearly why this is, and if possible, provide solutions which would in your view address these concerns.</p>	The Environment Agency confirmed by e mail to the Applicant on 12 February 2024 that the Applicant had now fully addressed their concerns on this matter.
21.8	EA	<p>Installation and commissioning techniques The Applicant states [REP4-087] that a meeting was held on 19 January 2024 with the EA to run through the full operational and installation process for the Waterbeach pipelines and the operational testing that would be undertaken prior to its use. The Applicant states that it prepared a briefing note dated 19 January 2024 for the EA to review, setting out the techniques used and agreement to this wording is sought. Please confirm if this has been reviewed and if you accept the Applicant's proposals? If not, why not? If so, does this information need to be secured through the dDCO?</p>	No response from the Applicant.
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>	The Applicant has received further comments from CCoC in relation to the Outline Drainage Strategy. This is now agreed in principle with an emphasis on the Applicant maximising SUDS to be agreed at the detailed design stage. The Applicant has been asked to clarify the use of just one of the models presented rather than two (model 1). This agreement and outstanding confirmation will be reflected in the Statement of Common Ground (App Doc Ref 7.14.4).
21.10	Applicant	<p>Surface water drainage Please review CCoC's written summary of oral submissions from ISH3 [AS-179] (page 11) regarding its expectations for surface water drainage and provide an update on this matter at D5.</p>	<p>From page 11 of AS-139 - 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"> - 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. - 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

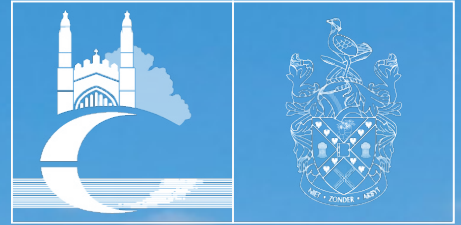
ExQ1	Question to	Question	Response
			<p>be set out to ensure that surface water runoff is being managed and treated sustainably from and therefore options to utilise more SuDS for runoff across the site should be investigated and discussed in the Outline Drainage Strategy.</p>
21.11	Applicant	<p>Surface water drainage SHHG states at D4 [REP4-106] that the open spaces for ponding appear to be set within some areas identified as 'at risk of contamination'. Any intended separation from these areas in the event of excess run off during maintenance cleaning, major incident cleaning and or extreme weather events such as flooding of the site is not clear. The presentation would suggest or at least not rule out there is a risk of pollutants entering this drainage system and thus Black Ditch via the attenuation pond. Please provide a response to these comments.</p>	<p>Question 21.11 requests further evidence to demonstrate that the areas 'not at risk of contamination', including the temporary storage provisions (such as the ponding areas within the works and the drainage attenuation facility located outside of the bund) will be physically separated from the 'contained drainage areas' where there is some risk of contamination.</p> <p>The updated Drainage Strategy Report (Examination Library Document REP4-074) includes the following drawings, in Sections 8.1 and 8.6 of the report:</p> <ul style="list-style-type: none"> • Report Section 8.1: Drawing 00008 (ref: 0001-100006-CAMEST-ZZ-LAYZ-00008) showing the Different Drainage Areas within the Proposed WWTW. • Report Section 8.6: Drawing 09822 (ref: 0001-100006-CAMEST-ZZ-LAYZ-09822) showing the Strategic Drainage Plan for the Proposed WWTP Area <p>The above drawings are a key part of the drainage strategy and demonstrate that the 'Areas not at Risk of Contamination', including the 'Open Spaces for Ponding' (as shown on Drawing 09822), will be kept separate from any of the 'Potentially Contaminated Areas' (as shown on Drawing 00008).</p> <p>The drainage design, including pollution protection strategy and isolation measures, will be developed further as follows:</p> <ul style="list-style-type: none"> • Drainage Model - Outline Design: The drainage model developed during outline design (as presented in Section 8.2 of the Drainage Strategy) was used to quantify the rainwater volumes that apply to the site drainage (areas 3 and 7 in Table 4.1) in a simple network and catchment arrangement. This model is suitable to for further development during the detailed design phase, to represent the complete integrated catchment including the consideration of rainfall volumes and of drainage paths (and of any attenuation measures such as ponding) and any separation requirements. • Pollution Protection Strategy – Detailed Design: A pollution protection plan will be used to identify any areas of potential contamination from the treatment works and operational activities (vehicle movements etc), and the protection requirements for particular areas of concern (such any of the potential drainage paths to the Black ditch via the attenuation pond). • Drainage Model – Detailed Design: As indicated above, the Infoworks model will be developed further to provide a detailed catchment model of the complete drainage system (including the drainage paths, areas of potential ponding, the pipe network and the attenuating facilities), to ensure that the areas 'not at risk of contamination' are adequately separated from areas 'at risk of contamination' during the event of excess run off (including during: maintenance cleaning, major incident cleaning and or extreme weather events such as flooding of the site). • Isolation Measures – Detailed Design: The detailed drainage model will be used to confirm the drainage paths and the height of isolation measures (such as kerbs and adverse-gradients and

ExQ1	Question to	Question	Response
			<p>impermeable surfaces and sealed drainage requirements etc) and the necessary freeboard provisions to prevent overspill between the potentially contaminated and uncontaminated areas.</p> <ul style="list-style-type: none"> • Treatment Works – Protection Measures: The various open topped tanks in the Works are not intended to overspill during extreme rainfall; this is prevented by providing adequate storm storage. There are also other protection measures in the Works; such as, where necessary, double isolation and bunded installations.
21.12	Applicant	<p>Land drainage The response to ExQ1.21.27 [REP1-079] is noted regarding land drains – could these points of clarification be incorporated within the CoCP Part A [REP4-040] as appropriate to ensure clarity?</p>	<p>The Applicant has updated the Code of Construction Practice Part A (App Doc Ref 5.4.2.1) at paragraph 5.14.3 to reflect the request made by the ExA.</p>
21.13	Applicant, SCDC	<p>BREEAM and water efficiency To SCDC: Would achieving BREEAM excellent rating achieve the maximum number of credits for category Wat01 of BREEAM, or would this need to be secured over and above BREEAM excellent? To the Applicant: At D2 [REP2-054], SCDC stated that a ‘requirement’ should be included within the dDCO to ensure that the Proposed Development would not be used or occupied until a water efficiency specification, based on the BREEAM Wat01 Water Calculator Methodology, had been submitted to approved in writing by the relevant planning authority. It is suggested that the maximum number of water credits should be achieved in order to comply with SCLP Policy CC/4 and the Greater Cambridge Sustainable Design and Construction SPD 2020. Please provide a response to this request.</p>	<p>The Applicant is now securing BREEAM excellent through the Design Code under code [PER.01 The Gateway Building and the Workshop Building should achieve a BREEAM Excellent Rating, in line with local planning requirements.]</p> <p>The Applicant believes there is the requirement to achieve the maximum number of water credits (5no.) under WAT01 to secure a BREEAM Excellent rating (based on the Greater Cambridge Sustainable Design and Construction SPD 2020 that all non-residential buildings should achieve all 5 credits under WAT01</p>
21.14	Applicant	<p>Septic tanks Within Appendix C of your D4 submission [REP4-087], you highlight the potential need for monitoring and mitigation of impacts on possible septic tanks located at Poplar Hall, Poplar Hall Farm and Red House Close. How are these measures proposed to be secured?</p>	<p>The Applicant has updated the Code of Construction Practice (CoCP) Part B (App Doc Ref 5.4.2.2) to include reference the measures set out in Appendix C of REP4-087, this will be submitted as part of the Deadline 5 submissions. The update to CoCP Part B secures the measures through Requirement 8 of the draft Development Consent Order (App Doc Ref 2.1)</p>
21.15	Applicant	<p>CFD Modelling The Design Code [REP4-085] submitted at D4 is noted, including Design Code OTF.06. However, should the CFD modelling inform the detailed design of the outfall, rather the detailed design informing the CFD modelling as it is currently worded? Furthermore, the use of terminology such as “appropriate” and “sufficient” are not sufficiently precise. Please amend the wording of Design Code OTF.6 to address the aforementioned points, noting that riverbed and bank protection measures should suitably ensure that the proposed outfall would not result in significant effects, so that it would accord with the findings of the ES.</p>	<p>The Applicant has amended the Design Code OTF.06 to:</p> <p>During the detailed design, further CFD modelling will be produced to inform the design of the outfall structure and flows that will flow from it. The design will ensure the structure and flows do not create a significant effect to either the riverbed or river bank and that the river bed and river bank protection measures are also not creating an effect that is significant</p>
21.16	Applicant	<p>Water quality assessment a) During ISH3, the ExA queried the purpose of the submitted water quality assessment [APP-161]. You advised that this was not part of the ES and informed the interim environmental permit, so is not relevant to the</p>	<p>a) The ES Appendix 20.11 Milton Water Recycling Centre Discharge Consent Water Quality and Ecological Assessment (App Doc Ref 5.4.20.11) [APP-161] informs the interim environmental permit relating to the existing Cambridge WWTP, and is a draft consultative permit application. As indicated in National Infrastructure Planning Advice Note Eighteen Paragraph 2.2, the WFD</p>

ExQ1	Question to	Question	Response
		<p>determination of the application. However, the water quality assessment informs the Water Quality Framework Assessment Report [APP-153] (see para 3.1.17), which does form part of the ES. Please clarify this matter.</p> <p>b) You also advised during ISH3 that an updated water quality assessment was contained within ES Chapter 20 [AS-040]. However, ES Chapter 20 does not appear to provide the same level of detail as that contained within the water quality assessment [APP-161] – for example, the water quality assessment refers to and presents SIMCAT modelling which was undertaken for total phosphorus and an assessment which presents modelling results of orthophosphate concentration data. It is not clear from the ES Chapter 20 whether updated modelling of total phosphorus or suspended solids was undertaken. Please identify how the conclusions within ES Chapter 20 regarding water quality have been derived, with particular reference to phosphorus, ammonia, biological oxygen demand, total suspended solids, dissolved oxygen and phosphorus, when there does not appear to be a detailed assessment (e.g. modelling information) contained within ES Chapter 20.</p>	<p>assessment and EIA influence decision making in different ways, and therefore the WFD Assessment Report [APP-153] can be considered separately to Chapter 20 Water Resources (App Doc Ref 5.2.20) [REP4-036]. Water Framework Directive elements of [APP-161] are used as a source of information to inform ES Appendix 20.3 WFD Assessment Report [APP-153]. [APP-161] is not used as a source of information for ES Chapter 20 Water Resources [REP4-036]. If the application numbering convention of submitted documents [APP-153] and [APP-161] has caused confusion, the Applicant would be happy to make changes to document numbering if needed.</p> <p>b) The Applicant has reviewed ISH3 recording and transcripts and cannot locate a statement relating to an updated water quality assessment contained in ES Chapter 20 Water Resources (App Doc Ref 5.2.20) [REP4-036]. The Applicant has not updated, and does not propose to update, the assessment of the impact of final effluent on water quality within ES Chapter 20 Water Resources (App Doc Ref 5.2.20) [REP4-036].</p> <p>SIMCAT/SAGIS modelling has not been undertaken for ES Chapter 20 Water Resources (App Doc Ref 5.2.20) [REP4-036], although numerical modelling of water quality will be undertaken by the Environment Agency in determining discharge conditions for the proposed WWTP. With respect to regulatory discharge conditions, the National Policy Statement for Waste Water (Paragraph 3.7.9) states <i>‘The decision maker should not refuse consent on the basis of regulated impacts unless it has good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted’</i>.</p> <p>The method for the assessment of the impact of final effluent discharge on water quality is set out in section 2.2 of the ES Chapter 20 Water Resources (App Doc Ref 5.2.20) [REP4-036]. The assessment in ES Chapter 20 Water Resources (App Doc Ref 5.2.20) [REP4-036] is based on a comparison of theoretical effluent loads discharged to the River Cam, calculated using the existing Cambridge WWTP consent limits and the indicative consent limits for the proposed WWTP. Comparison is made for determinants comprising Total Phosphorus as P, Ammoniacal Nitrogen as N, Biochemical Oxygen Demand (BOD) and Total Suspended Solids (TSS) since these are specified within the existing consent and in the pre-application advice. The Environment Agency has expressed agreement (pre-application advice, EA ref AC/2022/130943/04-L01, 21 December 2022) with the outcomes of the ES Chapter 5.2.20 assessment of water quality for the outfall: <i>“We agree with the outcomes of the water quality assessment for the outfall during operation (p. 129) and stormwater discharges (p. 135).”</i></p> <p>Dissolved Oxygen (DO) is not itemized in the existing Cambridge WWTP consent conditions, or in the pre-application advice for the indicative consent limits for the proposed WWTP. Therefore DO has not been included with the consented determinants in the water quality assessment in ES Chapter 20 Water Resources (App Doc Ref 5.2.20) [REP4-036]. However, the impact of the temperature of the final effluent discharge on concentrations of DO in the River Cam is assessed in a separate section in Chapter 20 Water Resources [REP4-036] (paragraphs 4.2.36 – 4.2.52). The potential impact of changes in BOD on DO is also discussed in the same section.</p>
21.17	CCoC	<p>Water Quality Do you consider your comments in your LIR [REP1-133] under para 14.21 regarding</p>	<p>The Applicant confirms that this is now agreed with CCoC and their concerns are met. This position will be reflected in the Statement of Common Ground (App Doc Ref 7.14.4).</p>

ExQ1	Question to	Question	Response
		the need for details on water quality and quantity to be controlled through the CEMP to be satisfactorily addressed by the Applicant?	
21.18	Applicant	Land drainage The response to ExQ1.21.27 [REP1-079] is noted regarding land drains – could these points of clarification please be incorporated within the CoCP Part A [REP4-040] as appropriate to ensure clarity.	This question is a repetition of ExQ2 21.12, please see 21.12 for the Applicants response.

Appendix A ExQ2 1.5 Greater Cambridge Biodiversity SPD



GREATER CAMBRIDGE
SHARED PLANNING

Greater Cambridge Shared Planning

Biodiversity Supplementary Planning Document

Adopted Final February 2022



Contents

1. Biodiversity Supplementary Planning Document	5	4. The biodiversity resource	23
1.1. Introduction	6	4.1. Introduction	24
1.2. Status of the Biodiversity Supplementary Planning Document	7	4.2. Statutory designated sites	24
1.3. Purpose	8	4.3. Non statutory designated Local Sites	28
2. UK Legislation	9	4.4. Protected species	29
2.1. Current legislation	10	4.5. Priority habitats	29
2.2. Environment Act 2021	12	4.6. Priority species	30
3. Planning Policy	13	4.7. Red List species	31
3.1. Planning context	14	5. Biodiversity in the development management process	32
3.2. National policy and guidance	14	5.1. Introduction	33
3.3. Existing local policies	16	5.2. Overarching principles	34
3.4. Area Action Plans and Neighbourhood Plans	17	5.3. Site selection stage	36
3.5. Other relevant adopted Supplementary Planning Documents	18	5.4. Pre-application stage	37
3.6. Local biodiversity strategies	19	5.5. Design stage	40
3.7. Permitted development	21	5.6. Application stage – validation requirements for biodiversity information	49
		5.7. Construction stage	56
		5.8. Post-construction stage	56
		6. Appendices	57



Figures

Figure 1
National Character Areas within Greater Cambridge

Figure 2
Internationally designated sites

Figure 3
Nationally designated sites

Figure 4
Locally designated sites

Figure 5
Stages within the development management process

Figure 6
Mitigation Hierarchy

Figure 7
An example of a small site

Figure 8
Hedgehog Highway gaps in boundary fence

Figure 9
Landscaping and soils

Figure 10
Integrated nesting habitat for birds or bats

Figure 11
A biodiverse roof

Figure 12
SuDS feature in a new development

Figure 12
Eversden and Wimpole Woods SAC

Index of biodiversity issues

- B1** Mitigation hierarchy
- B2** Protection of irreplaceable habitats
- B3** Great Crested Newt District Level Licensing
- B4** Conservation and enhancement of biodiversity
- B5** Biodiversity provision in the design of new buildings & open spaces
- B6** Provision of biodiverse and living roofs
- B7** Biodiversity Net Gain
- B8** Habitats Regulations Assessment
- B9** Eversden and Wimpole Woods Special Area of Conservation bat protocol
- B10** Recreational pressure on sensitive Sites of Special Scientific Interest





Nine Wells Cambridge, Guy Belcher

Foreword

Greater Cambridge is one of the fastest growing areas in the country, yet has a relatively small amount of land managed for nature.

It is vital that we protect, enhance and grow our biodiversity, both in terms of the amount of land managed specifically for nature, and the richness of biodiversity throughout our urban and rural environments.

This Supplementary Planning Document sets out guidance to assist applicants in meeting the policies of the Cambridge City and South Cambridgeshire Local Plans as well as the relevant national legislation. It provides clear guidance on how developments should consider biodiversity from the outset of the planning process to ensure that biodiversity is properly integrated into projects and is increased and enhanced as an outcome of development. This will help to ensure improved quality of new developments while reducing environmental impact as we deliver the new homes and businesses we need.

We look forward to applicants and developers applying this guidance across all scales of development and helping us create a greener and more biodiverse Greater Cambridge for future generations.

**Councillor
Katie Thornburrow**

Executive Councillor
for Planning Policy,
Cambridge City Council

**Councillor
Dr. Tumi Hawkins**

Lead Cabinet Member
for Planning, South
Cambridgeshire District
Council



Biodiversity Supplementary Planning Document

1.1. Introduction

1.2. Status of the Biodiversity Supplementary
Planning Document

1.3. Purpose

1.1. Introduction

- 1.1.1.** Biodiversity, a term coined in 1985 as a contraction of “biological diversity”, describes the variety of life on Earth, in all its forms and all its interactions. It incorporates all species and habitats, both rare and common, and includes genetic diversity. Biodiversity at local, national and global levels is under pressure as never before from climate change, habitat loss, species decline, and the threat of invasive species. Much of the habitat loss is driven by urban development fuelled by the need for housing and infrastructure. Species once considered to be common in Greater Cambridge are facing increasing stresses upon their populations and the rate of species loss has never been higher. International initiatives exist to reduce the rate of species loss and at the national level lists of species and habitats that require particular measures to halt their decline have been produced.
- 1.1.2.** Our goal in Greater Cambridge is to build *quality* places, rich in biodiversity and green infrastructure, good for people and good for nature. Both Cambridge City Council and South Cambridgeshire District Council have declared a biodiversity emergency, and strongly support a step change in the protection and enhancement of biodiversity in Greater Cambridge. The aim to better protect, restore and enhance our natural environment is clearly set out in the Environmental Principles, regionally agreed for the Oxford to Cambridge (OxCam) Arc development vision. These Environmental Principles seek to set ambitious goals, including the desire to realise Biodiversity Net Gain (BNG) at 20% for all development types within the Arc. This approach is further supported in more local initiatives like South Cambridgeshire’s Doubling Nature Strategy and Cambridge City’s upcoming Biodiversity Strategy. Together, these documents set the tone for greater aspiration and more robust biodiversity policies in the emerging Greater Cambridge Local Plan.
- 1.1.3.** As development forms one of the largest threats to biodiversity through the loss of natural habitats, it is incumbent on planning authorities and developers to recognise the importance of biodiversity protection and enhancement through provisions made in Local Plan policies, and through the enforcement of relevant national legislation. However, we can only do that if developments coming forward incorporate the correct elements from the beginning of the design process through to their build out.
- 1.1.4.** Enhancing biodiversity through the planning and development process brings numerous benefits. These will include, but not be limited to, improved habitats for species, flood protection and carbon sequestration as well as the broader secondary benefits for people, like improved mental health from access to natural green spaces.
- 1.1.5.** Going forward, biodiversity will not be peripheral to the planning process but will be fully integrated into the design stages. Consideration will be given, wherever possible, to the retention of biodiversity features within developments and to incorporating new habitats or specific biodiversity features into designs.
- 1.1.6.** Biodiversity is a valuable addition to any development, often helping to create attractive natural green spaces which integrate development of a high-quality design into the local landscape or townscape.

1.2. Status of the Biodiversity Supplementary Planning Document

1.2.1. When adopted, this draft Supplementary Planning Document will support existing policies for both South Cambridgeshire District Council and Cambridge City Council ahead of the adoption of a Greater Cambridge Local Plan, which is in preparation jointly by both authorities.

1.2.2. This Supplementary Planning Document provides practical advice and guidance on how to develop proposals that comply with the [National Planning Policy Framework](#) and the district-wide policies in the South Cambridgeshire Local Plan, adopted in September 2018, as well as those in the Cambridge Local Plan, adopted in October 2018. It also references policies in individual Area Action Plans for major developments, which may vary from the policies in the two adopted Local Plan documents.

1.2.3. The existing policies seek to ensure that biodiversity is adequately protected and enhanced throughout the development process. This Supplementary Planning Document provides additional details on how local policies will be implemented while also building on relevant legislation, national policy, central government advice, and the British Standard BS42020:2013 Biodiversity – Code of practice for planning and development. Available information about the contents of the Environment Act 2021 has been referenced.

1.2.4. This Supplementary Planning Document will supersede the South Cambridgeshire Biodiversity Supplementary Planning Document, adopted in 2009 to support adopted Development Control Policies. It will in time be updated to support the Greater Cambridge Local Plan when this is adopted.



Hobsons Park, Cambridge, Guy Belcher

1.3. Purpose

1.3.1. The objective of this Supplementary Planning Document is to assist the delivery of the Local Plan policies for both Councils relating to the conservation and enhancement of biodiversity.

1.3.2. The Supplementary Planning Document does not create policy, but explains how Local Plan policies should be interpreted and applied and provides guidance, setting out with clarity, the expectations that the Councils have for the treatment of biodiversity within the development management system and how those should be reflected by developers, their agents and their consultants in their submissions.

1.3.3. Reference is made throughout, with links where appropriate, to other available guidance that can help to direct and refine the design of development sites to ensure that opportunities for the conservation and enhancement of biodiversity are incorporated from the very start of the development process.

1.3.4. Specific objectives for this document are:

- To explain terminology associated with biodiversity conservation to assist applicants' understanding of the importance of biodiversity within the wider environment of Greater Cambridge.
- To be clear on the ways in which development proposals in Greater Cambridge can be formulated in an appropriate manner to avoid harm to biodiversity and to provide a long-term, measurable net gain for biodiversity.
- To encourage applicants to protect, restore and enhance locally relevant natural habitats and ecological features on their sites and to create new habitats, as part of a high-quality design.
- To assist applicants to gain planning permission in Greater Cambridge more quickly by informing them of the level of information expected to accompany planning applications.





UK legislation

2.1. Current legislation

2.2. UK Environment Act 2021

2.1. Current legislation

2.1.1. In their planning submissions, applicants are expected to demonstrate that their proposals are compliant with all relevant legislation regarding the protection of wildlife and habitats and should ensure that they receive the necessary professional advice to be able to do so. This legislation applies equally to projects that do not require planning consent (see section 3.5).

2.1.2. The principal legislation relating to biodiversity conservation in the UK, as it interacts with the planning system, is summarised below.

Conservation of Habitats and Species Regulations 2017 (as amended)

2.1.3. These regulations, often referred to as the Habitats Regulations, were the mechanism through which the European Commission Habitats and Wild Birds Directives were incorporated into UK law. The Habitats Regulations have been amended to reflect the consequences of Brexit, but their substance has been retained to provide protection for sites, habitats and species considered to be of international importance, including the designation of Habitats Sites (see section 4.2).

2.1.4. Local Planning Authorities have the duty, by virtue of being defined as ‘competent authorities’ under the Habitats Regulations, to ensure that planning application decisions comply with the Habitats Regulations. If the requirements of the Habitats Regulations are not met and impacts on Habitats Sites are not mitigated, then development must not be permitted.

2.1.5. Where a Habitats Site could be affected by a plan, such as a Local Plan, or any project, such as a new development, then Habitats Regulations Assessment screening must be undertaken. If this cannot rule out any possible likely significant effect on a Habitats site, either alone or in combination with other plans and projects, prior to the consideration of mitigation measures, then an Appropriate Assessment must then be undertaken. The Appropriate Assessment identifies the interest features of the site (such as birds, plants or coastal habitats), how these could be harmed, assesses whether the proposed plan or project could have an adverse effect on the integrity of the Habitats Site (either alone or in combination), and finally how this could be mitigated to meet the Stage 2 Habitats Regulations Assessment “integrity” test.

2.1.6. The aim of the Habitats Regulations Assessment process is to “maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest” (The European Commission Habitats Directive, 92/43/EEC, Article 2(2)). The Habitats Regulations 2017 have transposed the European Union Habitats and Wild Birds Directives into UK law to make them operable from 1 January 2021. These remain unchanged until amended by Parliament so the requirements for Habitats Regulations Assessment under the Conservation of Habitats and Species Regulations 2017 (as amended) have been retained.

Town and Country Planning (Tree Preservation) (England) Regulations 2012

2.1.7. These regulations set out the procedures for making Tree Preservation Orders and the activities that are prohibited in relation to trees protected by these orders. Tree Preservation Orders can be made for trees or groups of trees because of their nature conservation value, as well as for their amenity value.

Natural Environment and Rural Communities Act 2006

2.1.8. Section 40 of the Natural Environment and Rural Communities Act places a duty on public bodies in England to conserve biodiversity. It requires local authorities and government departments to have regard to the purpose of conserving biodiversity in a manner that is consistent with the exercise of their normal functions such as policy and decision making.

2.1.9. Section 41 requires the Secretary of State to publish and maintain lists of species and types of habitats which are regarded by Natural England to be of “principal importance” for the purposes of conserving biodiversity in England, and these are known as Priority Species and Priority Habitats.

Countryside and Rights of Way Act 2000

2.1.10. Amongst other things, this Act strengthens the protection afforded to Sites of Special Scientific Interest, including greater powers for Natural England to be able to secure their appropriate management and a requirement for local authorities to further their conservation and enhancement.

Hedgerow Regulations 1997

2.1.11. Although outside of the development management process, these regulations provide a convenient framework for the identification of hedgerows with importance for wildlife, landscape and heritage. For projects that do not require planning consent, the requirements of the regulations would need to be met to permit the removal of any hedgerow or hedgerow section, except if it forms a curtilage to a property.

Protection of Badgers Act 1992

2.1.12. This Act refers specifically to badgers, and makes it an offence to kill, injure or take a badger, or to damage or interfere with a sett unless a licence is obtained from a statutory authority.

Wildlife and Countryside Act 1981 (as amended)

2.1.13. The Wildlife and Countryside Act is the primary mechanism for the protection of all wildlife in the UK and includes schedules that set out those species with additional levels of protection. It also provides the basis for the identification of sites of national importance for nature conservation, Sites of Special Scientific Interest.

2.2. UK Environment Act 2021

- 2.2.1.** The Environment Bill received Royal Assent on 9th November 2021, meaning it is now an Act of Parliament. [The Environment Act](#) provides legislation to protect and enhance the environment to deliver the [Government's 25-year environment plan](#).
- 2.2.2.** Part 6 of the Act relates to nature and biodiversity, including habitat and species protection and enhancement within the planning process.
- 2.2.3.** The Act has mandated a minimum measurable Biodiversity Net Gain for all developments covered by the Town & Country Planning Act (TCPA) and requires that the biodiversity value of the development exceeds the pre-development biodiversity value of the site by a minimum of 10%. Biodiversity value is measured using a metric produced by DEFRA and the baseline value is calculated from the condition of the site before any intervention has occurred.
- 2.2.4.** BNG habitats can be delivered on-site, off-site or via statutory biodiversity credits, subject to BNG best practice guidelines, appropriate local delivery mechanisms and BNG providers being established. Habitats must be secured and managed for a minimum of 30 years via planning obligations or through Conservation Covenants, as described within part 7 of the Act.
- 2.2.5.** The Act specifies a two-year transition period before mandatory net gain become law. The timeline for secondary legislation and guidance for mandatory 10% Biodiversity Net Gain are still unknown, but it is likely to apply to all TCPA developments and National Significant Infrastructure projects (NSIPs), by late 2023. The Councils' interim expectations in relation to biodiversity net gain for biodiversity and our approach to assessment within the planning process, pending further clarification from Government, is set out under Biodiversity Issue B7 (page 46).
- 2.2.6.** Net gain requirements do not undermine the existing mitigation hierarchy, or the range of protection in planning policy and legislation for irreplaceable habitats, designated sites and protected species.
- 2.2.7.** The Act introduces a statutory requirement for Local Nature Recovery Strategies to be produced by a responsible authority appointed by the Government. The responsible authority is likely to be either the Local Nature Partnership or Cambridgeshire County Council. These strategies will map important habitat areas where there is an opportunity to improve the local environment to guide biodiversity net gain and other policies.

3

Planning Policy

- 3.1. Planning context
- 3.2. National policy and guidance
- 3.3. Existing local policies
- 3.4. Area Action Plans and Neighbourhood Plans
- 3.5. Other relevant adopted Supplementary Planning Documents
- 3.6. Local biodiversity strategies
- 3.7. Permitted development

3.1. Planning context

3.1.1. As local planning authorities, South Cambridgeshire District Council and Cambridge City Council have a statutory duty to carry out certain planning functions for their administrative areas. These functions include the preparation of a Local Plan and the determination of planning applications. The way these functions are to be carried out is governed by legislation and specified within the [National Planning Policy Framework](#), with reference to further guidance, standards and best practice focused on different considerations that influence planning decisions.

3.1.2. The following sections summarise current planning policy, as relevant to the subject of conserving and enhancing biodiversity. It should be noted that the subject of biodiversity overlaps significantly with other policy and strategy areas, including landscape, arboriculture, green infrastructure, health and wellbeing, sustainability, and climate change.

3.2. National policy and guidance

3.2.1. The National Planning Policy Framework promotes sustainable, well-designed development. Within this aim, it seeks to conserve and enhance the natural environment and ensure that biodiversity and appropriate landscaping are fully integrated into new developments in order to create accessible green spaces for wildlife and people, to contribute to a high quality natural and built environment, and to contribute to a better quality of life.

3.2.2. Section 15 of the National Planning Policy Framework covers the role of the planning system in conserving and enhancing the natural environment.

Paragraph 174. Planning policies should contribute to, and enhance the natural and local environment by, amongst other things:

a. protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner

commensurate with their statutory status or identified quality in the development plan).

d. minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

e. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.

f. remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

3.2.3. Paragraph 175. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a

3.2. National policy and guidance (continued)

strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

3.2.4. Paragraph 179. To protect and enhance biodiversity and geodiversity, plans should:

- a. identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping-stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- b. promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

3.2.5. Paragraph 180. When determining planning applications, local planning authorities should apply the following principles:

- a. if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.
- b. development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be

permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSS.I

c. development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d. development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

3.2.6. Paragraph 181. The following should be given the same protection as habitats sites:

- a) potential Special Protection Areas and possible Special Areas of Conservation;
- b) listed or proposed Ramsar sites; and
- c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites

Paragraph 182. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

3.3. Existing local policies

3.3.1. The policies from the South Cambridgeshire Local Plan and the Cambridge Local Plan that include an aim to conserve and enhance biodiversity, and that this Supplementary Planning Document supports and expands upon, are set out below. Full wording of these policies is included in Appendix 1.

South Cambridgeshire Local Plan

- NH/2 Protecting and Enhancing Landscape Character
- NH/3: Protecting Agricultural Land
- NH/4 Biodiversity
- NH/5 Sites of Biodiversity or Geological Importance
- NH/6 Green Infrastructure
- NH/7 Ancient Woodlands and Veteran Trees
- CC/8 Sustainable Drainage Systems
- HQ/1 Design Principles

Cambridge Local Plan

- 7 The River Cam
- 8 Setting of the city
- 31 Integrated water management
- 52 Protecting garden land and the subdivision of existing dwelling plots
- 57 Designing New Buildings (criteria h.)
- 58 Altering and extending existing buildings
- 59 Designing landscape and the public realm
- 66 Paving over front gardens
- 69 Protection of sites of biodiversity and geodiversity importance
- 70 Protection of Priority Species and Habitats
- 71 Trees



3.4. Area Action Plans and Neighbourhood Plans

3.4.1. Area Action Plans are documents that are adopted as part of the Local Plan and that set out policies and guidance for specific areas within the Council's administrative area. Neighbourhood Plans provide a similar function but are prepared by local communities. Both kinds of documents usually include policies that refer to biodiversity features, adding to the planning policy context for development management.

3.4.2. Neighbourhood Plans are an opportunity for communities to improve their local environment, including protecting and enhancing existing assets, such as local parks, nature reserves and other green spaces. Making biodiversity an integral part of neighbourhood planning can

also help to manage environmental risk and improve resilience to climate change. For example, identifying a local biodiversity network and integrating with land use policies could help to manage the risk of flooding by protecting natural blue and green spaces from development as well as designate these as Local Green Spaces where they provide public benefits.

3.4.3. Information about existing Area Action Plans, the areas designated for Neighbourhood Plans and the status of the plans can be found on the [South Cambridgeshire District Council website](#) and the [Cambridge City Council website](#).



3.5. Other relevant adopted Supplementary Planning Documents

3.5.1. Other Supplementary Planning Documents have been produced individually or collaboratively by the Councils, and these should be read alongside this one to ensure cross compliance and integration. The following documents are of direct relevance to Biodiversity, but this does not represent a complete list of Supplementary Planning Documents.

3.5.2. South Cambridgeshire District Council has adopted the following Supplementary Planning Documents

- [Landscape in New Developments](#) (adopted March 2010)
- [Trees and Development Sites](#) (adopted January 2009)
- [Open Space in New Developments](#) (adopted January 2009)
- [District Design Guide SPD](#) (adopted March 2010) particularly Chapters 2 & 3
- [Bourn Airfield New Village](#) (adopted October 2019)
- [Waterbeach New Town](#) (adopted February 2019)
- [Cottenham Village Design Statement](#) (adopted November 2007)
- [Fen Drayton Former Land Settlement Association Estate](#) (adopted May 2011)

3.5.3. Both Councils adopted the [Cambridgeshire Flood and Water](#) Supplementary Planning Document in 2018, which includes a strong focus on design and management of Sustainable Drainage Systems to enhance biodiversity value.

3.5.4. Both Councils adopted a [Sustainable Design and Construction](#) Supplementary Planning Document in January 2020 and are currently developing a new local landscape character area study Supplementary Planning Document.



Biomedical Campus, Cambridge, Guy Belcher

3.6. Local biodiversity strategies

- 3.6.1.** The following paragraphs summarise the range of strategies and projects of relevance to Greater Cambridge that are aimed at enhancing biodiversity or that provide technical support to focus measures that will achieve this. All of these have been endorsed or adopted by the Councils and should be used to guide decisions on habitat creation and species protection included within planning proposals. Reference to these initiatives would demonstrate the strategic basis of applicants' decision making around biodiversity matters.
- 3.6.2.** Natural Cambridgeshire is the Local Nature Partnership covering the whole of Cambridgeshire and Peterborough, providing strategic leadership for the recovery of nature under their [Doubling Nature vision](#). This vision seeks to achieve an increase in the amount of land managed for nature from 8% to 16%, by 2050. One of the main areas of focus to achieve this vision is securing high quality green and blue infrastructure within new residential and commercial developments.
- 3.6.3.** Natural Cambridgeshire has developed a [Development with Nature Toolkit](#) to provide developers with a means of demonstrating their commitment to achieving a net gain in biodiversity on major developments. The optional toolkit provides standard guidance that, if followed from the earliest stages of development planning, will determine whether nature is enhanced by the scheme or not. This best practice document is endorsed by both Councils.
- 3.6.4.** The [Cambridgeshire and Peterborough Future Parks Accelerator Project](#) follows a collaborative approach, seeking to safeguard the future of Cambridgeshire and Peterborough parks and green spaces by finding new ways to deliver, manage and fund parks and open space, with a shared vision across a wide range of partners and stakeholders. This work may identify future design principles and models for ongoing management of new natural green space provision that will require consideration during the planning process.
- 3.6.5.** [Cambridgeshire and Peterborough Environmental Records Centre](#), hosted by the Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire, and [Cambridgeshire and Peterborough Biodiversity Group](#), have prepared habitat opportunity maps covering grassland, woodland and wetland, identifying locations where habitat creation would have the most ecological benefit by connecting existing habitats where environmental conditions are most appropriate.
- 3.6.6.** South Cambridgeshire District Council and Cambridge City Council combined to produce a [Greater Cambridge Green Infrastructure Opportunity Mapping report](#), which provides an evidence base of green infrastructure assets and networks across Greater Cambridge and identifies specific and deliverable opportunities to enhance and expand the network. This document has been prepared as part of the evidence base for the forthcoming Greater Cambridge Local Plan.

3.6. Local biodiversity strategies (continued)

- 3.6.7.** [Cambridge City Council produced a Nature Conservation Strategy](#) that was adopted as part of the Local Plan in September 2006. The strategy is currently being reviewed but will continue to act as a guiding document for Cambridge City Council's general approach to biodiversity conservation across its range of functions. The Strategy will act in parallel to the new Supplementary Planning Document. It details the biodiversity resource within Cambridge, sets out strategic aims and principles to be implemented in order to further nature conservation, and includes action plans to address a wide range of identified key issues. Cambridge City Council passed a motion in May 2019 to declare a [biodiversity emergency](#) and their [biodiversity webpage](#) provides links to initiatives and projects implemented as part of their Nature Conservation Strategy.
- 3.6.8.** Cambridge Past, Present and Future is a charity focused on protecting and enhancing Cambridge's green landscape. In partnership with the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire, it has prepared a [Cambridge Nature Network](#), covering an area within a ten-kilometre radius of Cambridge. It identifies five priority landscape areas and highlights the best opportunities for the creation of new habitats and large-scale natural greenspaces. It also sets out the mechanisms by which the Nature Network can be grown, which includes the development process.
- 3.6.9.** The [Greater Cambridge Chalk Streams Project](#) seeks to protect and improve the chalk streams in and around Cambridge. The report (published in Dec 2020) provides an overview of the main problems affecting each chalk stream and the key opportunities to improve each one. It also identifies some potential projects for delivery in partnership with stakeholders and landowners.
- 3.6.10.** The [Wicken Fen Vision](#) is a 100 year plan to restore the Fenland landscape and habitats around Wicken Fen to an area of 53 square kilometres, linking to the Cambridge Nature Network.
- 3.6.11.** The importance of the landscape is reflected in national planning guidance with the National Planning Policy Framework stating that the planning system should contribute to, and enhance the natural and local environment by protecting and enhancing valued landscapes. The South Cambridgeshire landscape has several distinctive and readily identified characters. These have been identified by Natural England as five distinct [National Character Areas](#):
- The Fens
 - South Suffolk and North Essex Claylands
 - East Anglian Chalk
 - Bedfordshire and Cambridgeshire Claylands
 - Bedfordshire Greensand Ridge.

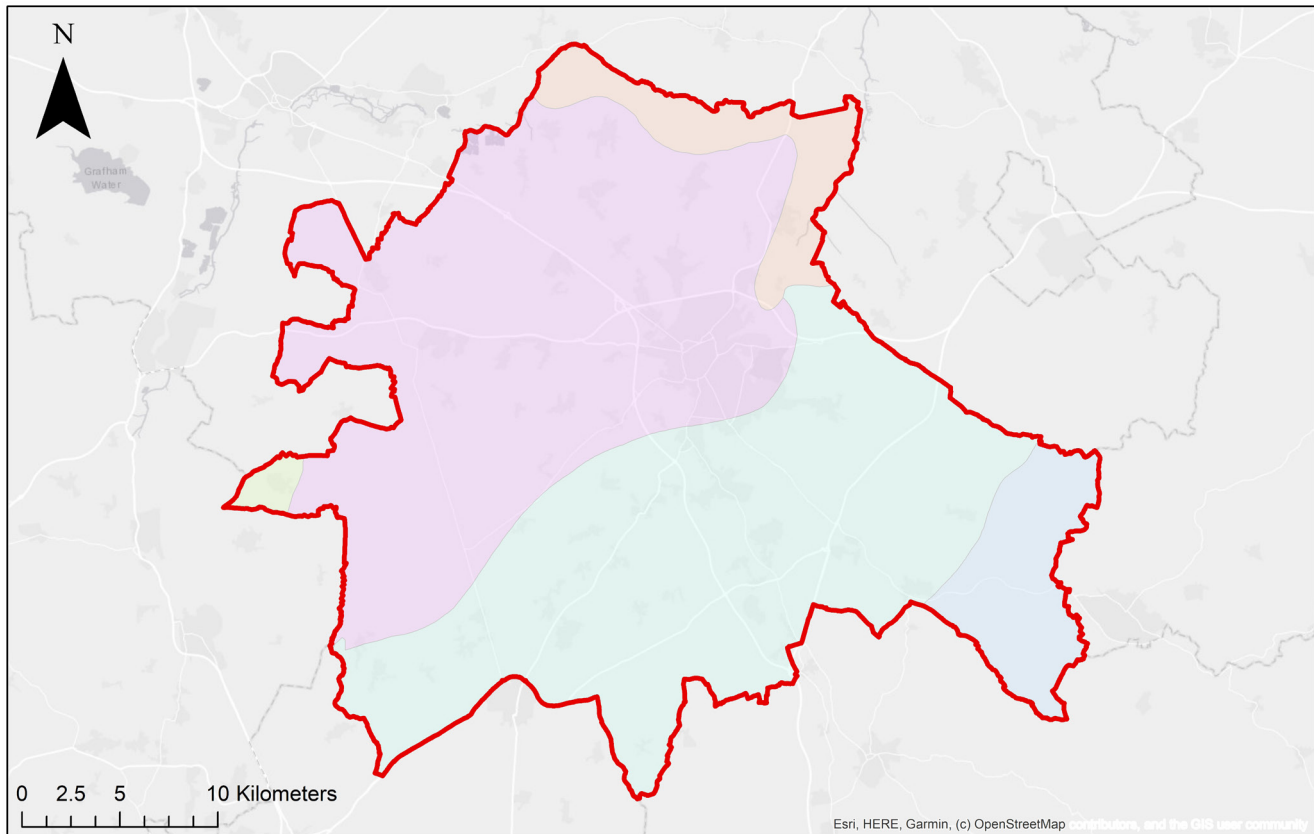


Figure 1 National Character Areas within Greater Cambridge

Legend

Greater Cambridge	Bedfordshire and Cambridgeshire Claylands	South Suffolk and North Essex Clayland
Bedfordshire Greensand Ridge	East Anglian Chalk	The Fens

3.7. Permitted development

3.7.1. Permitted development rights derived from [The Town and Country Planning \(General Permitted Development\) \(England\) Order 2015 \(as amended\)](#) mean that certain types of development can be performed without the need to apply for planning permission. However, although this would be outside the normal planning process, there remains a need for the Councils to consider the effects that any development relying on permitted development rights might have on biodiversity. Legal protection for wildlife still applies and so any legally protected animals, plants or habitats that may be affected will need proper consideration for the development to be lawful.

3.7.2. Certain types of development are granted planning permission by national legislation without the need to submit a planning application. This is known as 'Permitted development'. To be eligible for these permitted development rights, each 'class' specified in the legislation has associated limitations and conditions that proposals must comply with.

3.7. Permitted development (continued)

- 3.7.3.** One such condition on certain classes of permitted development is the need to submit an application to the Local Planning Authority for its 'Prior approval' or to determine if its 'Prior approval' will be required. This allows the Local Planning Authority to consider the proposals, their likely impacts regarding certain factors (such as transport and highways) and how these may be mitigated. Where natural habitats and wildlife are likely to be present, adequate information must be provided to the councils to support the assessment of the ecological implications of the development, the need for mitigation, and if necessary, the need for a licence from Natural England.
- 3.7.4.** Work must not commence on the development until the Local Planning Authority has issued its determination or it has received 'deemed consent' when the time period for a determination to be issued expires. By default, this is an eight week period from when the application is received, but this can vary depending on the type of proposal and may be extended if all parties are in agreement.
- 3.7.5.** Article 4 directions are made when the character of an area of acknowledged importance would be threatened, most commonly in Conservation Areas. Where properties are affected by such a direction, some of the permitted development rights can be removed by the Councils issuing an Article 4 direction, which then means planning consent will be needed for work that normally does not need it.
- 3.7.6.** Class Q applications are applications for Prior Approval for a change of use or conversion of a building, and any land within its curtilage, from a use as an agricultural building to that of a dwelling. Where the buildings are likely to support bats or other legally protected species, there is a risk that they may be affected by the proposals, and it is therefore essential that the Local Planning Authority has certainty of impacts prior to determination of any application. Sufficient information, including appropriate survey results, will be needed to support such an application.
- 3.7.7.** Permission in Principle applications do not include a consent as this is a separate step in the planning process. The scope of permission in principle is limited to location, land use and amount of development. Issues relevant to these 'in principle' matters should be considered at the permission in principle stage. Other matters should be considered at the technical details consent stage. In addition, Local Authorities cannot list the information they require for applications for permission in principle in the same way they can for applications for planning permission.
- 3.7.8.** Change of use applications can bring benefits if properly planned and sensitively managed. The use of grassland sites by horses for equestrian purposes can sustain their botanical interest. However, there is also much potential to damage the interest of grassland sites through over-grazing. Over-grazing may lead to the proliferation of certain undesirable species, increased soil erosion, and diffuse pollution. Development proposals for stabling or for Change of Use to paddock land will be subject to ecological assessment based on the likelihood of protected and Priority species being present and affected, as well as impacts on the local landscape character.

4

The biodiversity resource

- 4.1. Introduction
- 4.2. Statutory designated sites
- 4.3. Non statutory designated Local Sites
- 4.4. Protected species
- 4.5. Priority habitats
- 4.6. Priority species
- 4.7. Red List species

4.1. Introduction

4.1.1. Biodiversity exists everywhere and includes the ubiquitous species as well as rarities, but the designation of species and sites has been used as a means of identifying relative value and for the prioritisation of nature conservation action. This chapter provides a summary of the sites designated for their nature conservation value across the Greater Cambridge area, and of the legally protected and Priority species present.

4.1.2. All such sites and species are material to planning decisions, and the sites provide the core of the local ecological network as well as being integral to developing Nature Recovery Networks. Detailed information about designated sites and existing records of protected and Priority species can be obtained through a data search from [Cambridgeshire and Peterborough Environmental Records Centre](#).

4.2. Statutory designated sites

Habitats (European) sites

4.2.1. Special Protection Areas and Special Areas of Conservation are sites of international importance protected by the Conservation of Habitats and Species Regulations 2017 (as amended) as a requirement of the UK's commitment to international commitments. These were formerly known as European or Natura 2000 sites. Ramsar sites are wetlands of international importance that have been designated under the criteria of the international Ramsar Convention on Wetlands. Collectively, these sites are now known as Habitats Sites as defined by [National Planning Policy Framework](#).

4.2.2. The potential impact of planning proposals on Habitats Sites inside and outside of the Greater Cambridge area will need to be covered within supporting ecological information, as guided by defined Zones of Influence agreed with Natural England. These are likely to be based on a particular impact type and are shown as

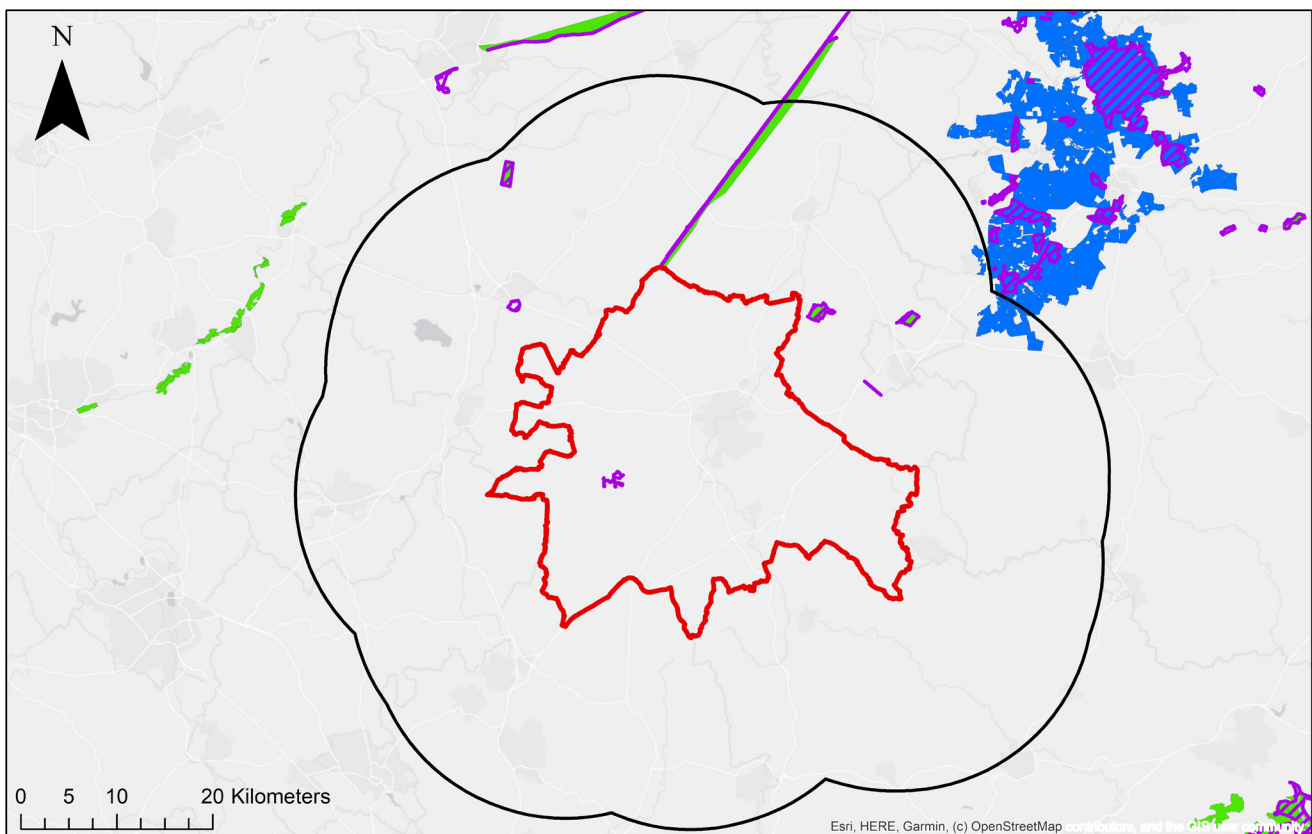
Impact Risk Zones on [Multi-Agency Geographic Information for the Countryside](#) around the underpinning Sites of Special Scientific Interest.

4.2.3. There is one Habitats Site - Eversden and Wimpole Woods Special Area of Conservation - located within the Greater Cambridge area, and a further four within 20km of the Councils' administrative boundaries. The distribution of these sites is illustrated in Figure 2, but [Multi-Agency Geographic Information for the Countryside](#) should be consulted for boundaries and site information:

- Ouse Washes Special Area of Conservation, Special Protection Area and Ramsar - abutting the Local Plan area to the north at Earith, designated for its internationally important breeding and over-wintering assemblages of birds, for its population of Spined Loach and for the presence of other nationally rare plants and animals.
- Portholme Special Area of Conservation - 4 km to the northwest, designated for its lowland hay meadow habitat.

4.2. Statutory designated sites (continued)

- Devils Dyke Special Area of Conservation - 5.8 km to the northeast, designated as an important orchid site on semi-natural dry grassland habitat.
- Fenland Special Areas of Conservation, which also covers the land designated as Wicken Fen Ramsar and Chippenham Fen Ramsar – approximately 1 km to the northeast, designated for its fen meadow and calcareous fen habitats.



Legend

- | | |
|------------------------------|-------------------------|
| Greater Cambridge | Ramsar |
| 20km buffer | Special Protection Area |
| Special Area of Conservation | |

Figure 2 Internationally designated sites

4.2. Statutory designated sites (continued)

- 4.2.4.** The Eversden and Wimpole Woods Special Area of Conservation comprises a mixture of ancient coppice woodland (Eversden Wood) and high forest woods likely to be of more recent origin (Wimpole Woods). Wimpole Woods holds the summer maternity roost of a population of Barbastelle bats (*Barbastella barbastellus*). The bats also use suitable habitat within the Special Area of Conservation to forage and it provides commuting routes when they forage outside of the site's boundary, where they utilise wet meadows, woodland streams and rivers.
- 4.2.5.** Surveys to support development proposals have identified summer roosts of male Barbastelle bats in old and unmanaged woodland outside of the Special Area of Conservation, using loose bark on dead trees and crevice features caused by damage. Barbastelle bats can range 20 km per night, further for non-reproductive females, and they frequently switch tree roosts throughout the year within their territory. Barbastelle bats will remain in tree roosts over winter unless temperatures dip below freezing, when hibernation roosts have been found in features such as caves, old buildings and basements.

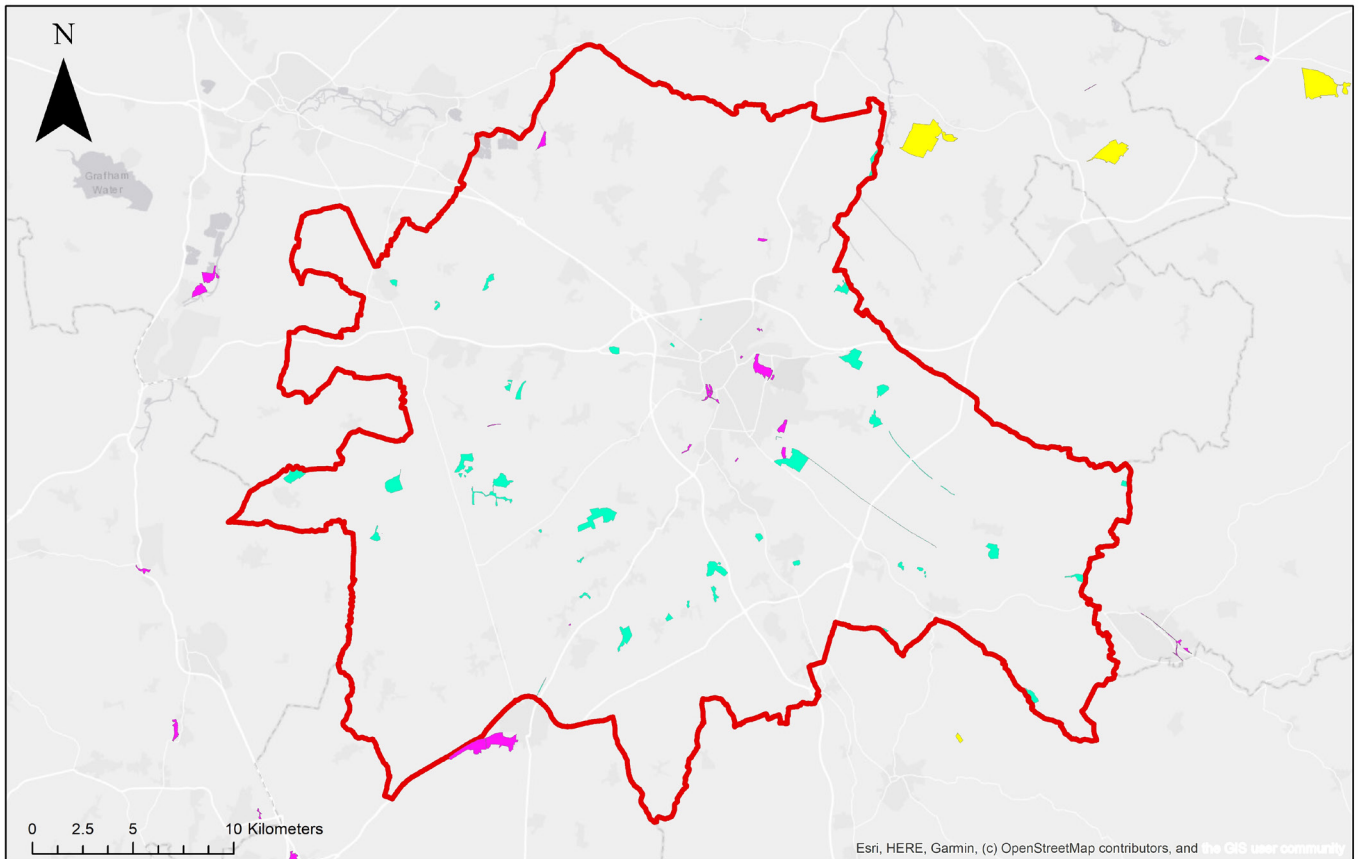
Sites of Special Scientific Interest

- 4.2.6.** Sites of Special Scientific Interest are designated in accordance with the duties in law placed upon each of the country nature conservation bodies to notify as a Sites of Special Scientific Interest any area of land which, in its opinion, is of special interest by reason of any of its flora, fauna, geological, geomorphological or physiographical features.
- 4.2.7.** There are 41 Sites of Special Scientific Interest within the Greater Cambridge area, covering a range of habitats and geological formations, including chalk grassland, species-rich neutral grassland, reedbed and fen, Ancient Woodland, chalk pits, gravel pits and clay pits. Further information can be obtained through the [Multi-Agency Geographic Information for the Countryside](#) including boundaries and links to site descriptions.

Local Nature Reserves (LNRs)

- 4.2.8.** Local Nature Reserves are statutorily protected sites of land designated by Local Authorities because of their special natural interest, educational value and access to nature. There are 13 statutory Local Nature Reserves within the Greater Cambridge area as illustrated on [Multi-Agency Geographic Information for the Countryside](#). More information on individual Local Nature Reserves is available on the [Cambridge City Council](#) and [Cambridgeshire County Council websites](#).

4.2. Statutory designated sites (continued)



Legend

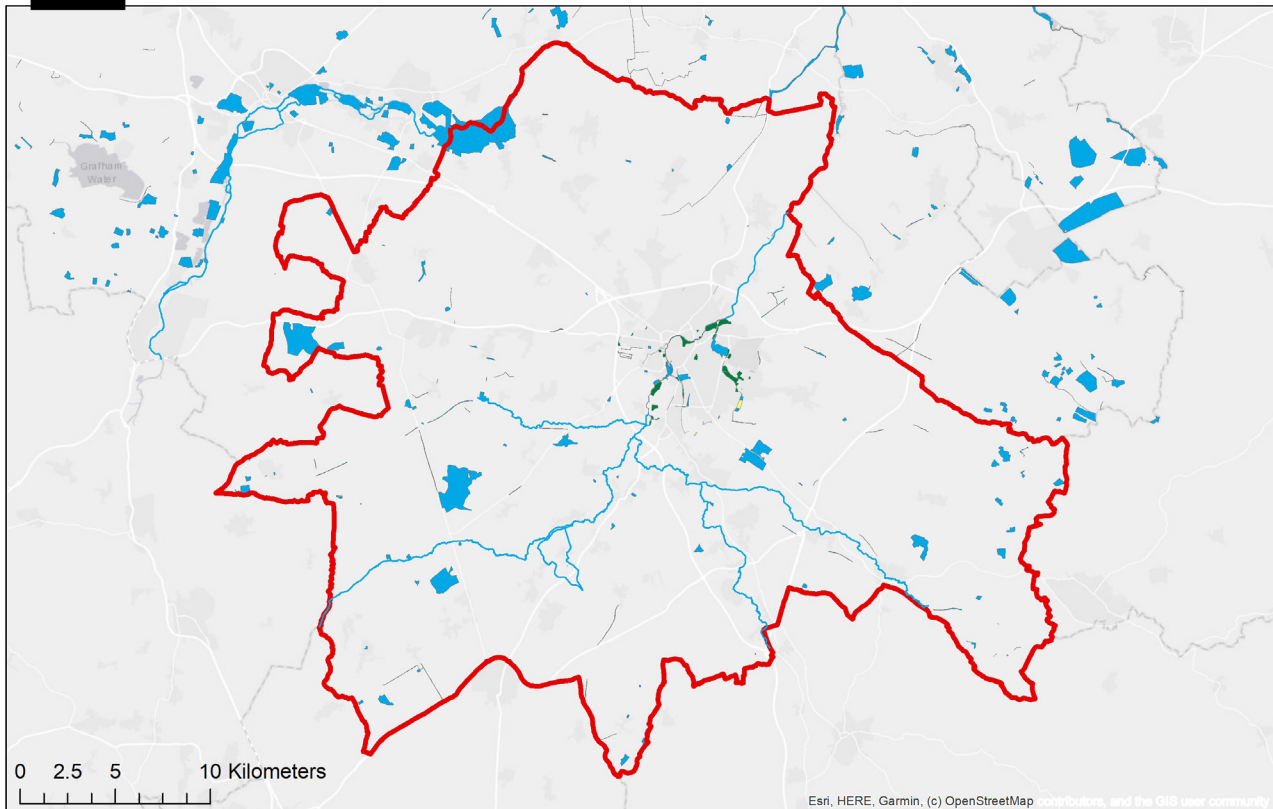
- | | | | |
|---|-----------------------|---|--------------------------------------|
|  | Greater Cambridge |  | National Nature Reserves |
|  | Local Nature Reserves |  | Sites of Special Scientific Interest |

Figure 3 Nationally designated sites



Midsummer Common, Cambridge, John Cornell

4.3. Non statutory designated Local Sites



Legend

 Greater Cambridge

 Local Geological Sites

 County Wildlife Sites

Figure 4 Locally designated sites

 City Wildlife Sites

4.3.1. Local Sites, as defined by the [National Planning Policy Framework](#), have been identified for all Councils in Cambridgeshire and are referred to as County Wildlife Sites. These are designated for their importance for nature conservation at a county level and are identified on the Councils' Local Plan Policies Maps. County Wildlife Sites are non-statutory sites identified against a set of locally developed [criteria](#), produced by Cambridgeshire & Peterborough County Wildlife Site Panel and covering both habitat and species.

4.3.2. The [National Planning Policy Framework](#) requires these sites to be protected through the Local Plan system as part of a Local Ecological Network. As well as supporting the majority of Priority Habitat within a given area, County Wildlife Sites often present opportunities for biodiversity enhancement, by improving existing management.

4.3.3. Within Cambridge City, a second layer of non-statutory sites have been identified and are referred to as [City Wildlife Sites](#), recognizing the importance of natural green space and habitats within the urban context. These sites are identified under a separate set of criteria with a lower threshold than for County Wildlife Sites.

4.3.4. Cambridgeshire's [Protected Roadside Verges](#) represent the best examples of road verge grassland across the county, identified for special management by Cambridgeshire County Council against a defined set of criteria based upon the presence of rare species or those indicating quality grassland habitat. Road verges constitute the largest area of unimproved grassland within the Greater Cambridge area and will be protected from development impacts. Many Protected Roadside Verges are also designated as County Wildlife Sites.

4.4. Protected species

- 4.4.1. The presence of any legally protected species is a material consideration in the determination of a planning application. Populations of most species are dynamic and so existing records can only be used as a guide to likely presence and should be tested by appropriate field survey work.
- 4.4.2. European Protected Species with known populations within the Greater Cambridge area are Great Crested Newts, 12 species of bats (including the population of Barbastelle bats at Eversden and Wimpole Woods Special Area of Conservation) and Otter, with a very few records of Dormouse.
- 4.4.3. A range of other UK species are protected by various pieces of legislation, primarily the Wildlife and Countryside Act 1981 (as amended). Those protected by their inclusion in the Schedules of the Act and known to be present in the Greater Cambridge area include White-clawed Crayfish, Water Vole, Badger, Common Lizard, Grass Snake and Barn Owl. The area also supports populations of Fairy Shrimp, including at the Whittlesford Thriplow Hummocky Fields Site of Special Scientific Interest.
- 4.4.4. For advice on proposals that will require a protected species mitigation licence, developers can use [Natural England's Pre-submission screening service](#).

4.5. Priority habitats

- 4.5.1. Priority Habitats are those included within the list prepared under Section 41 of the Natural Environment and Rural Communities Act. The distribution of Priority Habitats in South Cambridgeshire district and Cambridge City can be identified on the [Cambridgeshire Habitat Opportunity Map](#). Priority Habitats are largely represented by small, fragmented blocks, but there are clusters reflecting the varied environmental character of the area.
- 4.5.2. Lowland Calcareous Grassland is predominantly found to the south east of Cambridge, within the Gog Magog Hills. To the east and north east is the fenland, with concentrations of Lowland Fen, Reedbeds and Lowland Meadows. The corridor of the River Cam and its tributaries supports Floodplain Grassland Mosaic, Wet Woodland and Lowland Meadows, as well as the River habitat itself and Chalk Stream sections. To the west of Cambridge are Lowland Mixed Deciduous Woodland, Hedgerows, Lowland Meadows and Traditional Orchards on the boulder clay. To the north of Cambridge, the presence of Traditional Orchards on the fen edge reflects the significance of former land uses.
- 4.5.3. Natural England maintains inventories of Priority Habitats, which can be viewed on the [Multi-Agency Geographic Information for the Countryside](#) map. These inventories should only be viewed as provisional, with the presence or absence of Priority Habitats to be confirmed by field survey results, with reference to the published [UK Priority habitat descriptions](#).

4.6. Priority species

- 4.6.1.** Priority Species are those included within the list prepared under Section 41 of the Natural Environment and Rural Communities Act. Over 200 UK Priority Species are found in Cambridgeshire as a whole, which includes previously common but declining species such as Common Toad, Brown Hare, House Sparrow and Hedgehog alongside a range of lesser known invertebrates, and plants such as Purple Milk-vetch.
- 4.6.2.** Given the largely agricultural character of the area, there is also good representation of farmland bird species such as Skylark, Turtle Dove, Tree Sparrow, Grey Partridge and Yellowhammer, whose populations could be affected by any development on arable land. The loss of breeding territories of such farmland birds is likely to require compensation by provision on nearby farmland. Overwintering birds such as Lapwing and Golden Plover are also important farmland species to be considered in ecology surveys.
- 4.6.3.** [The Cambridgeshire and Peterborough Biodiversity Group](#) provides a full list of Priority Species known to be present in the county.
- 4.6.4.** Priority invertebrate species may be poorly recorded, but the identification of habitats and features of likely value to invertebrates should serve as a trigger to consider the need for specialist survey. The national invertebrate conservation charity Buglife has created a map of [B-Lines](#) as a strategic initiative to target habitat creation and connectivity for pollinators and has also mapped Important Invertebrate Areas, landscapes that are of particular significance for invertebrate populations, where a greater focus on impacts to favourable habitat may be required. The Fens [Important Invertebrate Area](#) lies within Greater Cambridge.

Brown Hare, Vincent Van Zalinge



4.7. Red List species

4.7.1. The nature conservation status of species has been determined by the assessment of populations against threat and rarity criteria, often at local, national and international levels. Species with higher rarity and threat status are generally known as Red List species. In the UK, information on national reviews and the status of species is available from the [Joint Nature Conservation Committee](#). As there is no centrally coordinated approach to these reviews, the coverage of species groups, the age of the information, and the criteria used vary.

4.7.2. There is no Cambridgeshire Red List, but there is a list of [Additional Species of Interest](#), which provides comparable information and includes the [Cambridgeshire Plant Species of Conservation Concern](#).



Corn Bunting, David C Wege

Non-native invasive species

4.7.3. Vigorous or invasive non-native species can impact negatively upon biodiversity by out-competing native flora. This can then lead to a negative impact upon fauna by limiting the available feeding and cover areas. Species of particular concern include Signal Crayfish (*Pacifastacus leniusculus*), American Mink (*Mustela vison*), Japanese Knotweed (*Fallopia japonica*), Indian Balsam (*Impatiens glandulifera*), Giant Hogweed (*Heracleum mantegazzianum*), Floating Pennywort (*Hydrocotyle ranunculoides*), Parrot's-feather (*Myriophyllum aquaticum*), New Zealand Pigmyweed (*Crassula helmsii*) and Water Fern (*Azolla filiculoides*). More information is available on the webpages of the [GB Non-native Species Secretariat](#).

4.7.4. Where proposals at development sites are likely to result in the spread of non-native invasive plant species the development may not be permitted until suitable measures have been agreed and / or undertaken to control the invasive species. It should be noted that it is an offence to spread, or cause to grow, certain plant species listed on Schedule 9 of the Wildlife and Countryside Act, 1981 as amended.

5

Biodiversity in the development management process

- 5.1. Introduction
- 5.2. Overarching principles
- 5.3. Site selection stage
- 5.4. Pre-application stage
- 5.5. Design stage
- 5.6. Application stage
- 5.7. Construction stage
- 5.8. Post-construction stage

5.1. Introduction

5.1.1. As biodiversity is a material consideration for planning, this section covers the need to consider biodiversity at every stage in the planning application process and what form that consideration should take

to ensure that progress is not held up. It sets out the types and quality of information that applicants and their ecological advisers are expected to achieve when preparing an application for submission.

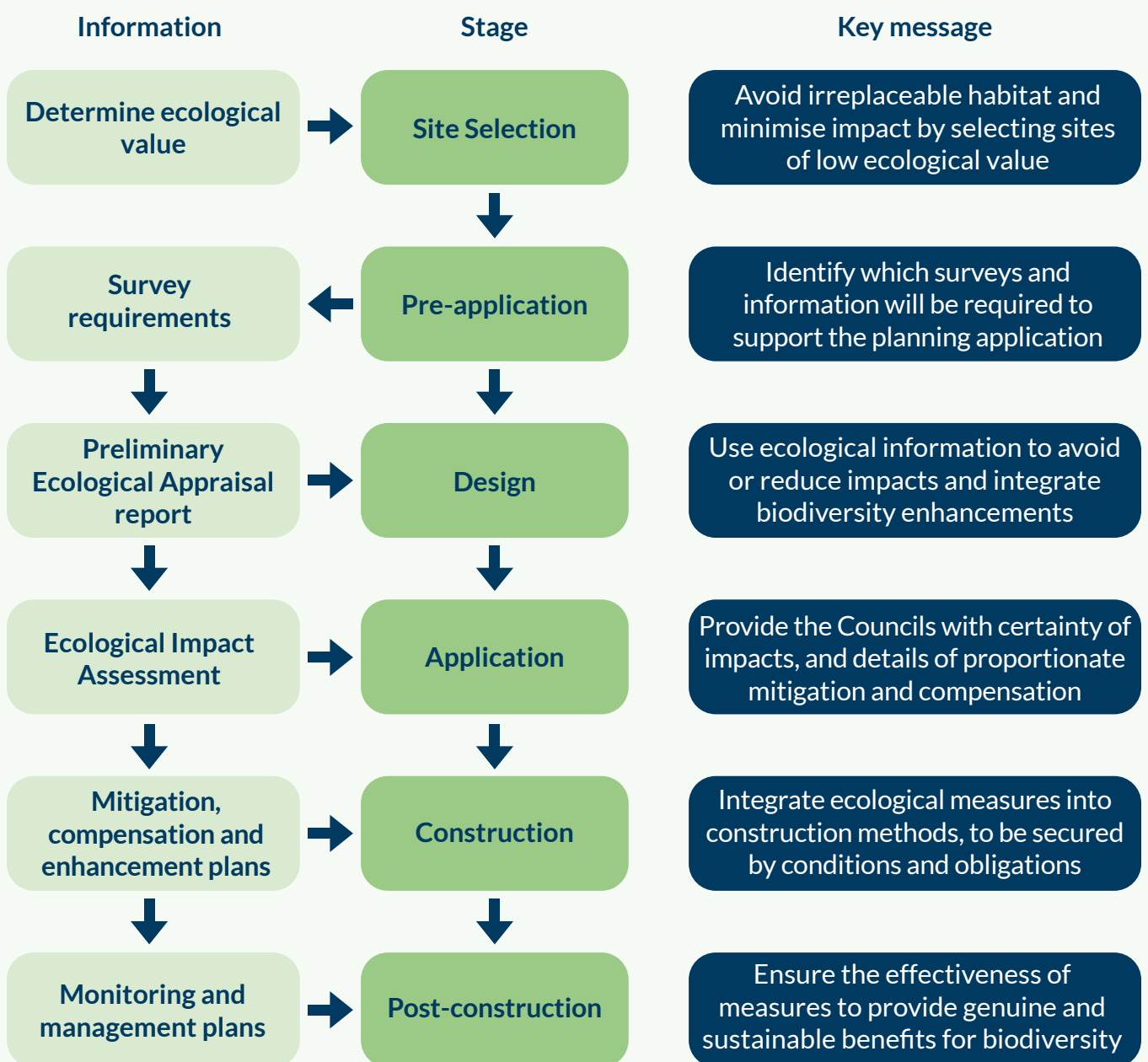


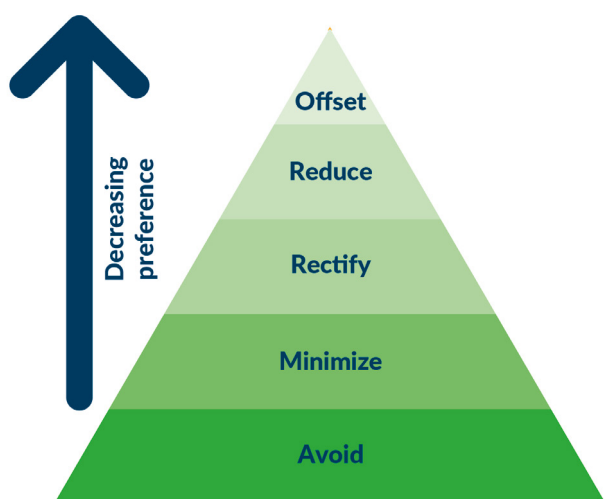
Figure 5 Stages within the development management process

5.2. Overarching principles

Biodiversity Issue B1 – mitigation hierarchy

To meet national and local policy requirements (NH/4 Item 3 and Policy 70), submitted ecological reports are expected to explain how the hierarchy of mitigation measures (Avoid, Mitigate, Compensate) has been embedded into the design of the development. Where impacts on habitats and species cannot be avoided, a clear explanation of why alternative sites are not feasible, and what proposed mitigation, and compensation measures are necessary to address all likely significant adverse effects is needed.

Figure 6 Mitigation Hierarchy



5.2.1. The mitigation hierarchy aims to prevent net biodiversity loss and strict adherence to its principles is essential. This approach is included in the [National Planning Policy Framework](#) and also in ecological best practice guidelines. Definitions vary, but usually include the following steps that must be implemented in order:

- Avoid - Anticipated biodiversity losses should be avoided and reduced by using alternative sites and designs, retaining habitats of value for enhancement and management and retaining species in situ.

- Mitigate - Impacts considered unavoidable should be mitigated where the impact occurs, by replacing lost protected and priority habitats and accommodating displaced species within the site boundary.
- Compensate - If mitigation measures are insufficient then, as a last resort, off-site compensatory measures should also be implemented in proportion to the harm, by creating suitable habitat off-site and relocating species.

5.2.2. As required by the [National Planning Policy Framework](#) and as a key principle of delivering Biodiversity Net Gain (see Biodiversity Issue B6), applicants must demonstrate that, in the design of their proposals, they have followed the mitigation hierarchy with respect to ecological impacts.

5.2.3. Ecological consultants can advise on avoiding negative impacts on the biodiversity of a development site by involvement throughout the planning application process, but most importantly at the site selection and design stages. Seeking advice early on in the planning process might help avoid costly delays later on.

5.2.4. Homeowners and developers will often require an ecologist to undertake ecological surveys and mitigation work in relation to a building project to meet the Councils' requirements for ecological information. Contracting a member of a professional institute such as the [Chartered Institute for Ecology and Environmental Management](#) means that you are engaging a professional who is working to high standards and there is a complaints procedure if anything goes wrong. Applicants needing to

5.2. Overarching principles (continued)

[find a consultant](#) to support their planning application can use the tool on the [Chartered Institute for Ecology and Environmental Management](#) website. This also provides further information on [ecological surveys and their purpose](#), which describes the different types of reports that you may be asked for by the Councils, [what to expect from a bat survey](#) and a [householder's guide to engaging an ecologist](#).

- 5.2.5. The approach to following the hierarchy should be informed by the ecological value of the habitats and species to be affected. Impacts to Priority habitats and species should always be avoided, if possible, but mitigation or compensation for any species or habitats degraded or destroyed through the development process is also required.

BS42020:2013 Biodiversity – Code of practice for planning and development

- 5.2.6. This British Standard gives guidance on how development might affect biodiversity, provides recommendations on how to integrate biodiversity into all stages of the planning, design and development process, and provides a rigorous framework for assessing impacts and for securing mitigation, compensation and appropriate biodiversity enhancements. Compliance with the standard in the ecological information submitted by applicants can be seen as an indication of its validity and relevance to the determination process and is encouraged. It is intended to assist those concerned with ecological issues as they arise through the planning process and in matters

relating to consented development that could have site-specific ecological implications.

- 5.2.7. BS42020 states that high quality ecological information is important for effective decision making as well as for compliance with legal obligations and policy requirements and successful implementation of the practical conservation and biodiversity enhancement measures identified in the ecological reports submitted with planning applications. The standard identifies the ecological data required and considerations for its assessment, and its use in the design of mitigation measures, to give certainty, clarity and confidence to those involved at all stages of the planning process.
- 5.2.8. Compliance with this standard is an important and credible way to demonstrate the validity of the ecological information you will bring forward in support of your planning application. Any deviations from this British Standard will need to be fully justified and they may be challenged by the Councils or external consultees, leading to delays in the decision process.



5.3. Site selection stage

5.3.1. The easiest way to avoid a negative impact on species and habitats and to maximise the gain for biodiversity that can be achieved from a development is to select a site that has low existing ecological value and low strategic potential for habitat creation, buffering or connectivity. This could include sites that have been intensively managed or where land use has resulted in degraded habitats. In addition, brownfield sites can also contribute to wider strategic potential for habitat creation by providing links between green corridors or linking up wildlife corridors. It should be noted that ecological value should be measured by a suitably qualified professional and not judged on appearance, as sites that may appear to be degraded could include features of particular significance to certain species.

Biodiversity Issue B2 – Protection of irreplaceable habitats

Developers will be expected to avoid direct and indirect impacts on irreplaceable habitats and embed measures to achieve this within the design of any development proposal.

To meet policy requirements (NH/4 item 6, NH/7 and Policy 71), the councils will refuse applications that would result in the loss, deterioration or fragmentation of irreplaceable habitats unless the need for, and benefits of, the development clearly outweigh the loss, and a suitable compensation strategy exists. In these situations, biodiversity net gain is not achievable. As per NPPF 2021, there would have to be wholly exceptional reasons for this to be the case with the burden of proof for these falling to developers to provide irrefutable evidence of these exceptional reasons.

5.3.2. Irreplaceable habitats are defined in the [National Planning Policy Framework](#) as “habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity.” In addition to Ancient Woodland and veteran trees, other types of habitat such as unimproved grassland, lowland fen and ancient hedgerows are also considered to be irreplaceable. The loss of these habitats cannot be compensated for by gains elsewhere and so they are excluded from Biodiversity Net Gain calculations.

5.3.3. All development predicted to result in impacts on irreplaceable habitat will need to be accompanied by detailed survey information and evidence to support the exceptional reasons that justify such a loss. Compensation strategies should include contribution to the enhancement and management of the habitat. Compensation for damaging development to a site by way of its habitat enhancement and management should not substitute action that would be happening anyway.

5.3.4. Ancient woodland shall be identified by having regard to the presence and combination of Ancient Woodland Indicator Species, as presented in the [Cambridgeshire and Peterborough County Wildlife Sites Selection Guidelines](#). The Woodland Trust’s [Planning for ancient woodland – planners manual for ancient woodland and veteran trees](#) should be used as a guide to avoiding and minimising impacts from development proposals.

5.4. Pre-application stage

Pre-application advice

- 5.4.1. There are many advantages to seeking pre-application advice from the Greater Cambridge Shared Planning Services at an early stage in the preparation of development proposals, particularly for ecology and Biodiversity Net Gain. This frontloads the process and avoids risks of delays and additional costs on submission, by providing the developers and their agents with clarity on the scope of information that will be expected to enable the application to be determined.
- 5.4.2. Where there is a predictable impact on biodiversity and insufficient ecological information is submitted to support determination, the Councils are likely to refuse an application.
- 5.4.3. The Greater Cambridge Shared Planning Service offers a [pre-application service](#) that can save time and money for anyone considering submitting a planning application, and it also offers design workshops to applicants. This may be particularly valuable to householders and those who are not regularly involved in development, who may not routinely seek professional ecological support or be aware of all of the relevant issues.
- 5.4.4. Developers wishing to seek substantive advice on recreational pressure impacts and mitigation relating to Sites of Special Scientific Interest should be directed to Natural England's [Discretionary Advice Service](#).

Existing biodiversity information

- 5.4.5. Biodiversity baseline information from the [Cambridgeshire and Peterborough Environmental Records Centre](#) is needed within all ecological reports, to identify the presence of designated sites and existing records of habitats and species that could be affected by development. Data search requests should be for a minimum 1 km buffer from the red line boundary for protected and Priority species and 2 km for all designated sites. While older data may be less relevant in some cases, it may provide the only baseline available for a site and so should not be discounted.
- 5.4.6. An absence of records does not mean a record of absence and ecological consultants need to use their professional judgment to ensure that biodiversity features are not overlooked. Survey and assessment of all species likely to be present on and adjacent to the development site and any which could be affected indirectly should be covered.
- 5.4.7. Provision of this data within submitted ecological reports needs to be presented in accordance with the terms and conditions of Cambridgeshire and Peterborough Environmental Records Centre and any sensitive records should only be shown at 10km resolution.
- 5.4.8. The consultant ecologist should also determine whether the development site falls within a Site of Special Scientific Interest Impact Risk Zone, as shown on the [Multi-Agency Geographic Information for the Countryside](#) map, which would indicate that the development could result in indirect impacts that require consultation with Natural England.

5.4. Pre-application stage (continued)

Biodiversity Issue B3 – Great Crested Newt district level licensing

To meet policy requirements (NH/4 and Policy 70) and support development which is likely to impact on Great Crested Newt, if a developer is accepted to join the Natural England Cambridgeshire Great Crested Newt District Level Licensing scheme, they do not need to carry out their own surveys for this European Protected Species or plan and carry out mitigation work.

If a consent for development is issued, developers do not need to meet the Government's [Standing Advice for Great Crested Newt](#). However, the Councils will still require survey and assessment for other protected and Priority species likely to be present and affected by development, together with delivery of any mitigation needing to be secured by a condition of any consent.

5.4.9. Natural England has now launched a District Level Licensing scheme for Great Crested Newt in Cambridgeshire that developers can pay to join for each of their sites, to better protect Great Crested Newt populations as an alternative to conventional site-based survey, licensing and mitigation methods. Full details are available on the relevant pages of the [Government District Level Licensing website](#).

5.4.10. As an alternative to Great Crested Newt surveys and assessment, the use of District Level Licensing provides a year-round option for developers to mitigate predicted impacts on Great Crested Newt and can provide certainty of costs and timescales.

5.4.11. With an agreement in place with Natural England to use District Level Licensing, the Councils only need an Impact Assessment and Conservation Payment Certificate countersigned by Natural England to be submitted with the planning application as evidence of site registration under this strategic mitigation scheme.

5.4.12. Participation in the District Level Licensing scheme does not negate the need for proposals to follow the mitigation hierarchy or deliver measurable net gain. The Councils will still require survey and assessment for other protected and Priority habitats and species likely to be present and affected by development, with any necessary mitigation secured by a condition of any consent.

5.4.13. A precautionary approach to site clearance, under the supervision of a suitably qualified ecologist, will be required for all development supported by Great Crested Newt District Level Licensing, or where protected and Priority species are predicted to be on site. To avoid reckless actions and wildlife crime, this will include supervision of any habitat works by an Ecological Clerk of Works, who will undertake a fingertip search, and implementation of a Construction Environment Management Plan (Biodiversity).

5.4.14. The Environment Act 2021 has indicated an intention to prepare other Strategic Mitigation Schemes in consultation with stakeholders to support delivery of sustainable development.

5.4. Pre-application stage (continued)

Ecological surveys and assessment

5.4.15. Applicants must ensure that planning applications are supported by adequate ecological information, using up to date desk studies and site assessment to inform survey methodologies sufficient in scope to allow the impact of a proposal to be appropriately assessed. This includes householders and developers of small sites, where there may be unexpected risks of impacts to habitats and species.

[CIEEM provide an advice note on the lifespan of ecological surveys here](#)

See Appendix 2.

5.4.16. A [Preliminary Ecological Appraisal](#) is often carried out by ecologists as an initial means of recording the habitats and condition of a development site and predicting the likely ecological constraints and impacts that might arise from its development.

5.4.17. Preliminary Ecological Appraisal Reports are valuable documents that should be commissioned at the earliest stages of design, and their results should influence the layout and form of the proposals. Identifying important ecological resources at the outset and avoiding impacts on them will limit the loss of biodiversity and reduce the need for mitigation and compensation measures. In many cases these reports will include recommendations for further survey, particularly in relation to protected and priority species.

5.4.18. All surveys must be carried out in accordance with published standards and best practice guidance, as appropriate to the information they are expected to generate. To ensure the acceptability of impact assessment, any deviations from best practice should be explained and justified.

5.4.19. Pre-development biodiversity value must be calculated before any site clearance or other habitat management work has been undertaken, by the applicants or anybody else. **However, if this is known to have happened, on or after 30th January 2020 the condition of the site will be taken as the habitat baseline stated in Schedule 14 Part 1 paragraph 6 of [the Environment Act 2021](#).** This is consistent with existing good practice guidelines for ecological assessment, including [CIEEM](#) and [BREEAM](#) guidelines. Where previous surveys are not available, this will be established through [Cambridgeshire and Peterborough Environmental Records Centre](#) records and habitat areas identified through aerial photographs. Where habitat conditions are not known, then a precautionary approach will be applied.

5.4.20. Habitat mapping methodologies need to be appropriate to their purpose, which for biodiversity net gain calculations means UK Habitats Classification, as required for the Defra Biodiversity Metric calculation. Phase 1 habitat mapping can still be used for PEA reports, or in circumstances where Biodiversity Net Gain calculation is not required.

5.4. Pre-application stage (continued)

5.4.21. Where the applicant's commissioned ecology report indicates that further surveys are required to support a planning application, the results of all such surveys and associated details of necessary mitigation measures will need to be submitted prior to determination. This is necessary to provide the Councils with certainty of likely impacts and that effective and deliverable mitigation can be secured either by a condition of any consent or with a mitigation licence from Natural England. Where recommended protected species surveys have not been completed, the ecology report will not be sufficient to support a planning application.

5.4.22. The Council expects that all biodiversity records obtained during surveys to inform development will be submitted to [Cambridgeshire and Peterborough Environmental Records Centre](#), as required by the Chartered Institute for Ecology and Environmental Management's code of professional conduct. Applicants must not seek to restrict their ecological consultants from submitting biodiversity records.

5.5. Design stage

Biodiversity Issue B4 – Conservation and enhancement of biodiversity

To meet national and local policy requirements (NH/4, NH/5, NH/6, Policy 69 and Policy 70), development should:

1. Secure the conservation management and enhancement of natural and semi-natural habitats in the landscape together with the biodiversity that they contain and seek to restore and/or create new wildlife habitats.
2. Secure the provision of appropriate public access to natural green spaces, particularly within or close to the villages.

Habitats will be considered important for biodiversity where they:

1. Are part of the UK national network of sites (Habitats sites) or are proposed for designation.

2. Are nationally designated sites (Sites of Special Scientific Interest, National Nature Reserves or Local Nature Reserves) or are proposed for designation.
3. Are non-statutory designated sites of at least County or City importance or are proposed for designation.
4. Are likely to support the presence of a Priority species or habitat, or significant populations of a national or local Red list species.
5. Have the potential to assist in the delivery of National, County or District Nature Recovery Networks and clearly act as a stepping-stone, wildlife corridor or refuge area.
6. Provide for the quiet enjoyment of biodiversity within semi-natural areas or act as an educational resource, such as Local Nature Reserves.

5.5. Design stage (continued)

5.5.1. Proposals that contain or that will affect a habitat of importance for biodiversity will be expected to include measures to protect any existing value and to improve their condition by appropriate enhancement or management measures. Retaining existing biodiversity features on sites might make it easier to achieve Biodiversity Net Gain. Management should be sustainable for the long-term, with clear objectives guided by the site's existing habitat features and species, as appropriate to location and environmental conditions.

5.5.2. While it can be possible to combine positive nature conservation management with public access, it should be noted that the potential impact of public access must be fully considered in determining the likely target condition of the biodiversity habitat and its value to any existing species populations. Measures to manage the existing impact of recreation on an area of semi-natural public open space will be welcomed.



Back Garden, Place Services

Figure 7 An example of a small site

Even small sites can support protected and priority species; although this house and garden appear unremarkable, there are two bat species using the loft, nesting birds in the dense common ivy, and great crested newts in a small pond.

5.5.3. Small sites, including gardens and other urban green space, can also support habitats and species of nature conservation value and provide opportunities for enhancement and improved management.

5.5.4. Where appropriate, the Councils will secure measures to conserve and enhance biodiversity by applying a planning condition requiring the submission and approval of an Ecological Design Strategy or a species-specific Biodiversity Mitigation Strategy, which will include:

- a) The purpose and conservation objectives of the proposed works.
- b) A review of baseline conditions, site potential and constraints.
- c) Detailed designs and/or working methods to achieve stated objectives.
- d) The specific extent and location of proposed works shown on maps and plans at an appropriate scale.
- e) The type and source of materials to be used, where appropriate, such as specifying native species of local provenance or the type of bird box to be used.
- f) A timetable for implementation, demonstrating that works are aligned with any proposed phasing of development.
- g) The persons responsible for implementing the works.
- h) Details of initial aftercare and long-term maintenance.
- i) Details for monitoring and remedial measures.
- j) Details for disposal of any wastes arising from works.

5.5. Design stage (continued)

Biodiversity Issue B5 – Biodiversity provision in the design of new buildings and open spaces

To meet policy requirements (HQ/1, NH/4, Policy 57 and Policy 59), the Councils will expect:

1. That development proposals will have regard to the biodiversity already present within a development site and to identify opportunities to maximise the provision for biodiversity within new development sites with strategic nature conservation priorities.
2. That on all residential housing developments, there should be an equal number of integrated bird box features as dwellings for building-dependent birds (breeding Swifts, House Sparrows, Starlings and House Martins) provided individually or clustered in appropriate locations within the development. On constrained sites, particularly those with a large number of apartments, practical consideration should be given to prioritising bird, bat or insect boxes in optimum areas of the site.
3. That all suitable commercial and community building applications will include integrated bird box features for building dependent birds (breeding Swifts, House Sparrows, Starlings and House Martins) in keeping with the scale of development, i.e. minimum of 10 boxes for the first 1000 sqm footprint and one additional box for every 100 sqm.
4. That on all residential housing developments 25% of the dwellings/units will have integrated bat box features; provision to be clustered next to appropriate foraging habitats.
5. That new wildlife habitats and features, including predominantly native trees and shrubs and durable tree mounted nest boxes, bat boxes and insect boxes, will be incorporated into landscaping schemes and the general layout of the built environment. All fencing will be expected to be hedgehog friendly and hedgehog highways should be incorporated throughout the development.

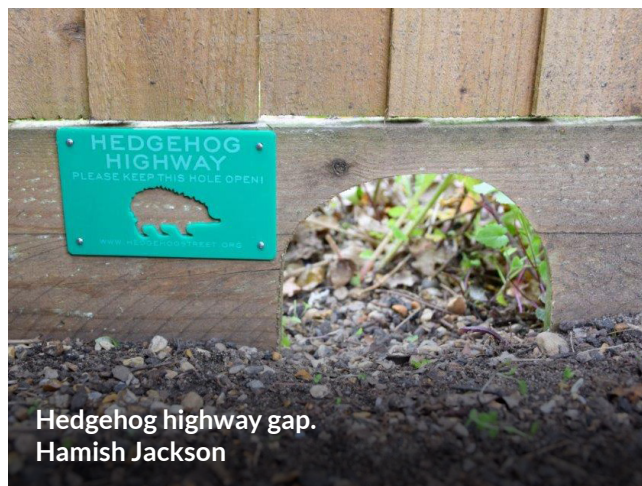


Figure 8 Hedgehog Highway gaps in boundary fence.

Incorporating Hedgehog Highway gaps into boundary fences ensures connectivity between gardens for Hedgehogs and other wildlife, increasing the extent of habitat available in a secure way.

- 5.5.5. Design of new developments should retain habitats of value to biodiversity wherever possible. Even for small scale developments, this would include boundary hedgerows, trees and any pond on site and these can provide the framework for the setting of the scheme layout as well as contributing to the post development network for nature and people.

5.5. Design stage (continued)

5.5.6. Landscape design will be required to enhance existing habitats and link them to new habitats created within the development site that are suited to the landscape character (see section 3.6.10). Further information can be found on the [Building Research Establishment Environmental Assessment Method](#) webpage for a Green Guide Calculator and [Building with Nature](#).



Figure 9 Landscaping and soils

A bank and low nutrient substrate with sparse vegetation, incorporated into landscaping to benefit solitary mining bees and other invertebrates.



Figure 10 Integrated nesting habitat for birds or bats

Integrated boxes primarily designed for swifts will also be used by other species such as house sparrow and are easily built into new buildings.

5.5.7. The use of low nutrient status soils to support diverse habitat mosaics with low maintenance requirements is encouraged and applications within the [B-Lines](#) identified by Buglife will be expected to include sustainable landscaping features of value to invertebrates, especially pollinators, including flowering lawns.

5.5.8. Natural timber and aggregate waste from site should be retained and repurposed for habitat creation such as hibernacula and low nutrient banks wherever possible.

5.5.9. The impact of garden extensions into the open countryside needs to be considered as; although these provide an opportunity to diversify arable landscapes, species and features associated with a farmland landscape may not be replicable within the garden environment. Applicants, where appropriate, will be required to plant mixed native species hedges with trees to define boundaries in open countryside as opposed to the erection of fences that may hinder the natural movement of animals. In the above image, a bank and low nutrient substrate with sparse vegetation are incorporated into landscaping to benefit solitary mining bees and other invertebrates.

5.5.10. In addition, the provision of integrated boxes (a combination of bird, bat & insect boxes) will be required in new buildings for all types of development and should target protected, Priority and other species associated with the built environment, such as Swift, as promoted by [Action for Swifts](#), house sparrow, starling and pipistrelle bats. Where appropriate, high quality, durable boxes can also be provided on retained trees within the public realm.

5.5. Design stage (continued)

5.5.11. Artificial lighting has the potential to negatively impact on nocturnal species and should be minimised, particularly in areas of natural habitat, woodland edges, hedgerows, and wetlands. Ecological sensitive lighting conditions may be imposed in some cases. The Bat Conservation Trust provide the following [Guidance Note on Bats and Artificial Lighting](#).

Biodiversity Issue B6 – Provision of biodiverse and living roofs

To meet policy requirements (HQ/1, NH/4 and Policy 31), the provision of biodiverse roofs and walls will be encouraged as a means to maximise biodiversity, particularly where the opportunities for ecological enhancement on a site area are limited, and where such measures will deliver enhancement at a landscape scale where appropriate, as part of a wider strategy of biodiversity enhancements.

5.5.12. Although buildings can be screened using native species planting, they can also be made attractive to biodiversity by using climbing plants on walls, fitting window boxes or installing biodiverse roofs and walls. Green roofs should support diverse habitats of local relevance rather than sedum monocultures, which have aesthetic appeal, but limited value to biodiversity. Brown roofs, landscaped with exposed substrates and a varied topography, and supporting nectar and pollen rich flowering plants, are a good alternative. Further information can be found on the [Building Research Establishment Environmental Assessment Method](#) webpage for a Green Guide Calculator and [Building with Nature](#).



Living Roof, Cambridge, Dinah Foley Norman

Figure 11 A biodiverse roof

A biodiverse roof, showing a diversity of flowering plants in an open grassland structure. Habitat design and species mixes should reflect local conditions and stated conservation objectives

5.5.13. Biodiverse roofs can provide valuable habitat on sites where space for new habitat creation is constrained. In the image above, the living roof shows a diversity of flowering plants in an open grassland structure within an otherwise dense, urban setting. Habitat design and species mixes should reflect local conditions and stated conservation objectives.

5.5.14. They could also have an especially important role to play in providing new habitat for the species, often ecological specialists, displaced by the development of brownfield sites, and for invertebrates that already live in towns and gardens. Guidance on constructing biodiverse roofs is available from Buglife and applicants are encouraged to follow the Green Roof Organisation's [Green Roof Code](#).

5.5.15. Thin substrate sedum systems do not maximize the biodiversity potential of green roofs and would not merit Good condition within the Defra Biodiversity Metric.

5.5. Design stage (continued)

Sustainable drainage systems

5.5.16. The [Cambridgeshire Flood and Water Supplementary Planning Document](#) was adopted by South Cambridgeshire District Council in November 2018 and Cambridge City Council in December 2018 following adoption of the Cambridge and South Cambridgeshire Local Plans and is accompanied by the [Cambridge Sustainable Drainage Design and Adoption Guide](#).

5.5.17. Inclusion of sustainable drainage systems within a development site are the preferred approach to managing rainfall from hard surfaces and can be used on any site (CC/8, Policy 31). They provide an opportunity to reduce the effects of development on the water environment. Good design and management of multi-functional open spaces can mitigate drainage impacts on wetlands via drains and ordinary watercourses as well as delivering biodiversity enhancements and attractive greenspaces that can support Biodiversity Net Gain on site. SUDs (like the one pictured in Figure 11) should be designed to provide natural habitats appropriate to the surrounding landscape, using locally native species and managed to combine functionality and opportunities for biodiversity.

5.5.18. The Royal Society for the Protection of Birds and the Wildfowl and Wetlands Trust have produced a guide to maximising the benefit to [biodiversity from Sustainable Drainage Systems](#) alongside other functions. The [ARGUK Toads – Advice for Planners](#) provides guidance on road, kerb and gully designs to limit impacts on amphibian populations.



Nine Wells, Cambridge, Guy Belcher

Figure 12 A SuDS feature in a new development

SuDS features should be designed to provide natural habitats appropriate to the surrounding landscape, using locally native species and managed to combine functionality and opportunities for biodiversity

5.5.19. Developers should check details of [Registered Toad crossings](#) listed by Froglife, the national amphibian & reptile charity, (which includes one in the centre of Cambridge) in relation to the development site location and layout. This will help avoid direct impacts on known toad breeding populations from the discharge of the sustainable drainage systems constructed for the development. Similarly, well designed sustainable drainage systems features are likely to attract breeding amphibians and future migration routes should be considered to avoid creating new road or drain fatality hotspots.

5.5.20. Paving of surfaces is likely to contribute to surface water flooding and the Councils will seek to avoid unnecessary paving of gardens by householders (CC/8, Policy 66) and encourage good design to ensure permeable surfaces remain and that there is no net loss in biodiversity. Any trees should be retained within paving and permeable surfaces used, potentially including planting within the design.

5.5. Design stage (continued)

Biodiversity issue B7 – Biodiversity net gain

This SPD is underpinned by national and Local Planning Policies. In keeping with these, and the SPD, development proposals will be required to demonstrate measurable net gain for biodiversity (NH/4, NH/6, Policy 69, Policy 70). Biodiversity Net Gain should be achieved on site where possible and in accordance with BS8683:2021 [Process for designing and implementing Biodiversity Net Gain](#).

5.5.21. Previous paragraphs have explained the process of how developers will calculate a pre-development baseline for an application site using the Defra Biodiversity Metric 3.0 tool (or its successor). They explain how a calculation should also be made of the post development baseline seeking to identify a net gain in biodiversity on that site. Achieving a Net Gain of 10% would be consistent with levels in the Environment Act 2021 by Winter 2023, after a two year interim period. However, in keeping with the Councils' desire to ensure that biodiversity is both protected, and enhanced, we advise that should new Local Plan policies instruct a higher percentage of Biodiversity Net Gain than that nationally mandated, that the higher of the two amounts (of Biodiversity Net Gain) shall be the minimum requirement for development.

5.5.22. The Councils encourage the achievement of further Biodiversity Net Gain by development proposals. This aspiration is supported by the recently formulated Doubling Nature Vision, adopted by South Cambridgeshire District Council (Feb 2021). This vision reflects the growing awareness of biodiversity loss and increasing concerns to protect the natural environment, habitats and species.

The vision seeks a 20% level of Biodiversity Net Gain above pre-development baseline conditions. Whilst this Supplementary Planning Document does not set this as a figure or target, this aspiration may have further support with future amendments to the Environment Act 2021.

5.5.23. Where onsite options for Biodiversity Net Gain have been exhausted, compensatory arrangements to provide shortfalls required and agreed with applicants under the vision can be provided offsite. Where off-site habitat measures are required, they must be consistent with the strategic aims of the [Cambridge Nature Network](#) and [Greater Cambridge Green Infrastructure Opportunity Mapping](#) and conform to [Biodiversity Net Gain - Good Practice Principles for Development](#).

5.5.24. To ensure the delivery of Biodiversity Net Gain measures, the Councils will seek to use planning conditions to secure on site habitat creation and its long-term management, and obligations, such as Section 106 of the Town and Country Planning Act 1990, where BNG is on land outside the applicant's control.

5.5.25. All Biodiversity Net Gain calculations should be submitted using the Defra Biodiversity Metric 3.0 or its successor. Other "bespoke" calculators will not be accepted without clear justification.

5.5.26. There will always be some opportunity within development proposals to create and manage habitats for biodiversity. Development proposals that deliver public open space that also provides new wildlife habitats, with clear management objectives, will be encouraged.

5.5. Design stage (continued)

- 5.5.27.** Biodiversity Net Gain has been identified as one of the primary mechanisms for the restoration of biodiversity across the UK and the local need is recognised within the Natural Cambridgeshire Doubling Nature vision. To achieve the vision, a strategic approach to habitat creation and enhancement will be required in line with the [Lawton principles](#) of more, bigger, better and more joined up.
- 5.5.28.** This will require focus on improving the condition of existing Biodiversity Sites, increasing their size, and improving connections between them by creating stepping-stones and corridors of biodiversity rich habitats. The existing [Cambridge Nature Network](#) lays the foundations for this approach and will be supported and clarified by forthcoming Local Nature Recovery Strategies.
- 5.5.29.** All development must already demonstrate measurable net gain for biodiversity, in line with the requirements of the [National Planning Policy Framework](#). Although a mandatory requirement for 10% net gain in biodiversity value is mandated by the Environment Act 2021, a value of 20% is likely to be encouraged as best practice in order to meet the Natural Cambridgeshire target of doubling the amount of land managed for nature from 8% to 16% of the county's area.
- 5.5.30.** It should be noted that the inclusion of street trees within developments can make a contribution to Biodiversity Net Gain as well as providing a range of other benefits, including to air quality and urban cooling, and as mitigation for the effects of climate change. The selection of the right tree species in the right place, where there is enough space to achieve maturity - in terms of height, canopy spread and rooting area - is essential to maximise benefits. Cambridge City Council has a policy to ensure that adequate provision is made for the preservation and planting of trees when granting planning permission (Policy 71).
- 5.5.31.** For minor developments (fewer than 10 residential units or an area of less than 0.5 hectares) and householder applications, biodiversity net gain measures should be clearly identified in supporting information and illustrated on the relevant plans. Measures should be appropriate to the site's location and surroundings and should be focussed on supporting recognised nature conservation priorities. The [Defra "small sites" Biodiversity Metric](#) should be used to demonstrate net gain in these circumstances. Small sites should also include integrated bird, bat or insect box provision, hedgehog friendly fencing and habitats as listed in 5.5.10 above.

5.5. Design stage (continued)

5.5.32. In support of major applications, a Biodiversity Gain Plan will be expected, which should include:

- Steps taken to avoid adverse impacts to biodiversity.
- Pre-development and post-development biodiversity value (including a completed Defra Biodiversity Metric calculation spreadsheet v3.0 or its successor).
- Additional information to explain and justify the approach to delivering net gain, including notes on the existing and target habitat condition and any assumptions made.

5.5.33. The Local Planning Authority will verify the accuracy of the biodiversity value calculations and consider the merits of any off-site net gain measures with reference to the Biodiversity Opportunity Maps produced by Cambridge and Peterborough Environmental Records Centre, the Cambridge Nature Network and any other published biodiversity strategies. Any scheme

of Biodiversity Net Gain must include a mechanism for delivery of the target habitats, management, and monitoring of their condition, and an approach to remediation in the event of targets not being met.

5.5.34. Pre-development biodiversity value must be calculated before any site clearance or other habitat management work has been undertaken, by the applicants or anybody else. It should be noted that the baseline for habitats on any site proposed for development will be taken as 30 January 2020, (as set out in the UK Environment Act 2021), or the nearest (in time) prior aerial photographic evidence or survey.

5.5.35. Applicants should refer to the Chartered Institute of Ecology and Environmental Management and Construction Industry Research and Information Association [Biodiversity Net Gain Good Practice Principles](#) documents for information on the standards that will be expected.



5.6. Application stage – validation requirements for biodiversity information

- 5.6.1.** The [Cambridge City Council validation checklists](#) and draft [South Cambridgeshire District Council validation checklist](#) are available to ensure that applicants know which documents need to be submitted with a planning application for it to be deemed valid by the Greater Cambridge Shared Planning Service.
- 5.6.2.** The Local validation checklist for the Greater Cambridge Shared Planning Service will include guidance under Local Validation Requirement 2 ‘Biodiversity - Ecological Impact Assessment’ about when an Ecological Impact Assessment is necessary, based on what the development involves and where it is. Guidance is also provided on what an Ecological Impact Assessment should cover for an application to be considered valid, including the need to demonstrate measurable Biodiversity Net Gain.
- 5.6.3.** It should be noted that validation does not necessarily mean there is sufficient information to allow for determination. The submitted Ecological Impact Assessment still has to provide the Councils with certainty of all likely ecological impacts on designated sites and protected or priority species and to demonstrate that effective and deliverable mitigation can be secured either by a condition of any consent or a mitigation licence from Natural England.

Ecological Impact Assessment

- 5.6.4.** In addition to the information within BS42020, the [Chartered Institute for Ecology and Environmental Management](#) provides detailed [guidance](#) about expectations in the reporting of biodiversity information

in support of planning applications. In selecting their project team, applicants are encouraged to choose professional ecologists that will comply with these expectations and can demonstrate their suitability for the role. Full details of those involved in survey work and reporting should be included in all reports with a summary of their experience and competence.

- 5.6.5.** The appropriate document type to provide ecological information in support of a planning application is an Ecological Impact Assessment. CIEEM have produced a note on report writing here: [Guidelines for Ecological Report Writing | CIEEM](#). This type of ecological report needs to contain all necessary survey results and a full assessment of ecological impacts, with proportionate and fully detailed mitigation and compensation measures that can be secured by condition or obligation, or by appropriate species licensing.
- 5.6.6.** Surveys and reports have a finite lifespan due to the dynamic nature of species populations and the response of habitats to environmental factors and changes in management. CIEEM have produced [guidance](#) to highlight the issues with lifespan and the validity of reports in different circumstances. Applications supported by reports that are no longer considered valid are likely to be refused and outline or phased developments are likely to require conditions for further surveys to keep the survey information up to date.

5.6. Application stage – validation requirements for biodiversity information (continued)

Biodiversity Issue B8 – Habitats Regulations Assessments

To support the Councils in meeting policy requirements (NH/5 and Policy 69) and their legal duties as Competent Authorities under the Conservation of Habitats and Species Regulations 2017 (as amended) – known as the Habitats Regulations - where development is likely to result in a significant effect on a Habitats site, proposals need to be supported by information to support the preparation of the Habitats Regulations Assessment (HRA) by the Local Planning Authority. This needs to include the results of any necessary surveys and details of any mitigation measures to avoid adverse effects on the integrity of the site(s) embedded into design of the development.

All the Councils' Habitats Regulations Assessment Appropriate Assessments will be sent to Natural England for their formal consultation response on their conclusions before any decision can be issued.

5.6.7. The aim of the [Habitats Regulations Assessment](#) process is to 'maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest'. The Conservation of Habitats and Species Regulations 2017 (as amended) have transposed the European Union Habitats and Wild Birds Directives into UK law to make them operable from 1 January 2021. These remain unchanged until amended by Parliament so the requirements for [Habitats Regulations Assessment](#) under the Conservation of Habitats and Species Regulations 2017

(as amended) have been retained.

- 5.6.8.** The Greater Cambridge Local Plan may impact on several Habitats sites and Government advice to Local Planning Authorities on [Habitats Regulations Assessment](#) requires assessment of any plan or projects which could adversely affect these internationally important Biodiversity Sites.
- 5.6.9.** Where a Habitats site could be affected by a plan, such as a Local Plan, or any project, such as a new development, then [Habitats Regulations Assessment](#) screening must be undertaken. If this cannot rule out any possible likely significant effect on a Habitats site, either alone or in combination with other plans and projects, prior to the consideration of mitigation measures, then an Appropriate Assessment must then be undertaken. This is an Appropriate Assessment of the implications for that site in view of that site's conservation objectives. Consent can only be granted when it can be ascertained by an Appropriate Assessment that there will not be an adverse effect on the integrity of a European Site unless, in the absence of alternative solutions, there are imperative reasons of overriding public interest and the necessary compensatory measures can be secured.

5.6. Application stage – validation requirements for biodiversity information (continued)

5.6.10. Various Court rulings need to be considered when preparing Habitats Regulations Assessment screening reports and developers are requested to provide sufficient information to support this process. Some key rulings from the Court of Justice for the European Union, which remain relevant to [Habitats Regulations Assessment](#) in the UK, post-Brexit, are:

- CJEU People Over Wind v Coillte Teoranta C-323/17)

In line with the Court judgement mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a plan or project is likely to result in significant effects on a Habitats Site.

- CJEU Holohan C- 461/17

This Court judgement imposes more detailed requirements on the competent authority at Appropriate Assessment stage. These relate to habitats and species for which the site has not been listed and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site. The Appropriate Assessment conclusion must be beyond all reasonable scientific doubt concerning the effects of the work envisaged on the site concerned.

- CJEU Joined Cases C-293/17 and C-294/17 Coöperatie Mobilisation for the Environment and Vereniging Leefmilieu (Dutch nitrogen court ruling)

These Dutch cases concerned authorisations schemes for agricultural activities in Habitats sites which cause nitrogen deposition and where levels already exceeded the critical load. These are not directly connected with, or necessary for the management of a Habitats site. This ruling is relevant to projects which trigger Appropriate Assessment before any consents are issued so should be considered when identifying other plans and projects for an in- combination assessment.

5.6.11. The following case from the UK High Court is also of key relevance:

- R (on the Application of Preston) v Cumbria County Council [2019] EWCA 1362

This case relates to a High Court verdict which quashed a County Council's decision to vary a planning permission for a water company to construct a sewage outfall on a Special Area of Conservation. Therefore, planning authorities and other competent authorities cannot, in Appropriate Assessments, simply rely on the competence of other regulators such as the Environment Agency, to avoid conducting their own assessments. They must instead themselves satisfy their own Habitats Regulations duties.

5.6. Application stage – validation requirements for biodiversity information (continued)

Biodiversity Issue B9 – Eversden and Wimpole Woods Special Area of Conservation Bat Protocol

To support the Councils in meeting policy requirements (NH/5 and Policy 69) and their legal duties under the Conservation of Habitats and Species Regulations 2017 (as amended), appropriate levels of survey, assessment and mitigation will be expected for any development that could have an impact on the population of Barbastelle Bats within and around the Eversden & Wimpole Woods Special Area of Conservation.

5.6.12. The Eversden and Wimpole Woods Special Area of Conservation supports maternity colonies of Barbastelle bats. In addition to these Special Area of Conservation woodlands containing roosting sites, the bats also require access to habitats outside the boundary of Eversden & Wimpole Woods Special Area of Conservation. The Habitats Regulation Assessment screening report for Bourn Airfield identified that male Barbastelle bats roosted in woodlands to the north of the Special Area of Conservation and commuted into the woodlands for mating.

5.6.13. Habitat that is integral to supporting the functioning of the Eversden and Wimpole Woods Special Area of Conservation is referred to as functionally linked land. In the case of this internationally important designated site, the woodlands that the male Barbastelle bats roost in, and any commuting routes between the two, are classed as functionally linked land. The Bat Conservation Trust also defines “Core Sustenance Zones” which refer to the area surrounding

a communal bat roost within which habitat availability and quality will have a significant influence on the resilience and conservation status of the colony using the roost.

5.6.14. Bats also typically forage and commute along linear features, such as hedgerows, rivers and woodland edges. Flight-lines for Barbastelle Bats are known to extend beyond the designated Special Area of Conservation boundary into the wider local landscape. A narrow strip of woodland and hedge that link Wimpole and Eversden Woods together is known to be a very important flight-line for Barbastelle Bats and other bat species, and Natural England has highlighted the importance of managing this feature carefully including the need to thicken hedges affected with additional planting.

5.6.15. A draft protocol has been prepared by the Greater Cambridge Shared Planning Service to facilitate sustainable development and secure a diverse and healthy landscape for bats, people and other wildlife.

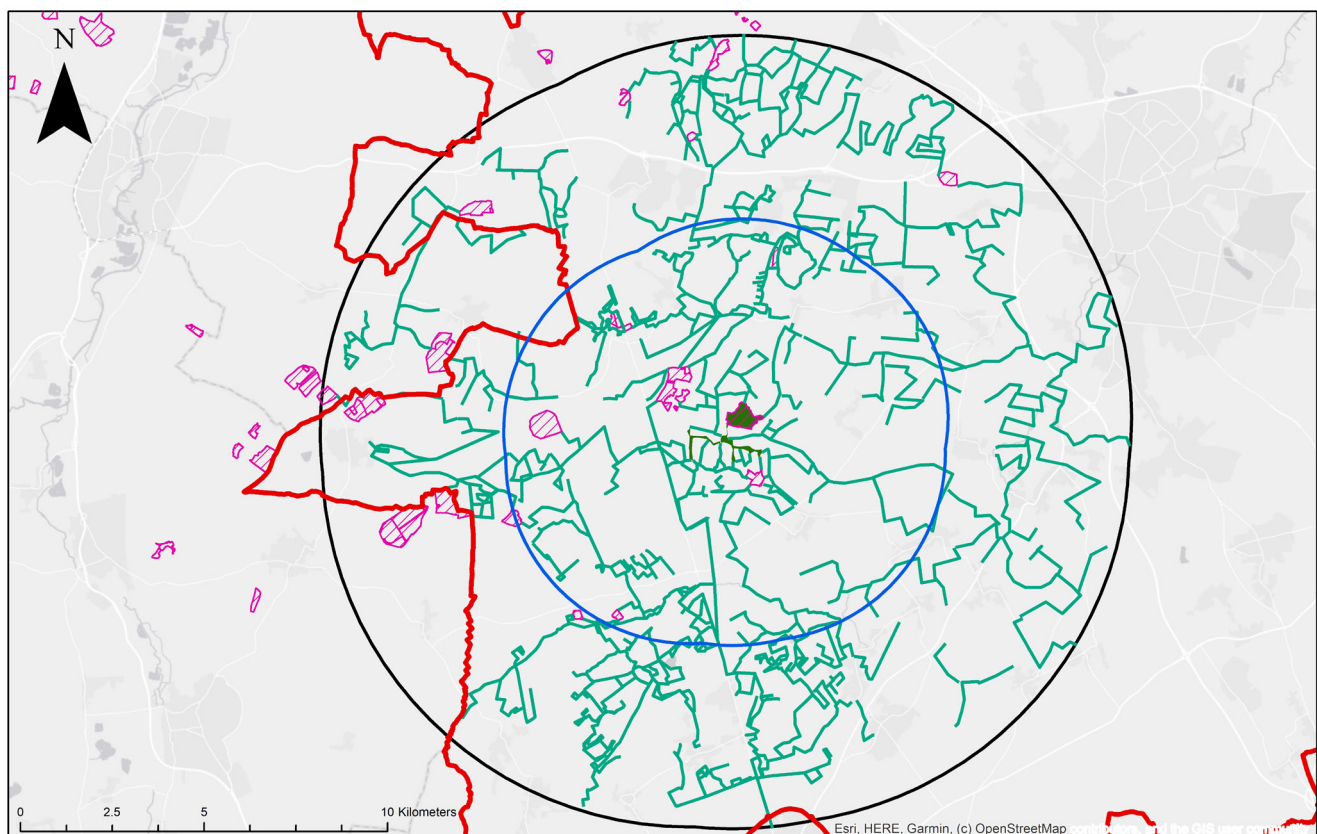
5.6.16. By following the guidance in the draft Eversden & Wimpole Woods Special Area of Conservation protocol, the Councils can ensure that the Special Area of Conservation bat populations thrive and that developments around the designated site avoid impacts on them, thereby preventing delays during their consideration at the planning stage.

5.6. Application stage – validation requirements for biodiversity information (continued)

5.6.17. The draft bat protocol uses the Site of Special Scientific Interest Impact Risk Zones identified on the [Multi-Agency Geographic Information for the Countryside](#) map for Eversden and Wimpole Woods Special Area of Conservation which are integral to the long-term survival of the population of Barbastelle Bats. All development proposals within this area, with the exception of householder applications, should aim to retain mature trees, woods and copses, and to provide new habitat linkages through new tree planting and the integration of existing hedgerow networks with new ones. All development within 5 km

of the Special Area of Conservation designated site is considered by Natural England as a key conservation area with a 10 km sustenance or wider conservation area. Please note that at time of writing, Natural England are reviewing the IRZ distances for this site, possibly extending out to 20km.

5.6.18. The Eversden and Wimpole Woods Special Area of Conservation map below shows the relative Impact Risk Zones and indicative functionally linked habitat (please note this is for illustrative purposes only, so some hedgerows, and smaller woods are not shown).



Legend

- | | |
|----------------------|-----------------------|
| 5km Impact Risk Zone | Ancient Woodland |
| Greater Cambridge | 10km Impact Risk Zone |
| Hedgerows | |

Figure 13 Eversden and Wimpole Woods SAC

5.6. Application stage – validation requirements for biodiversity information (continued)

Biodiversity Issue B10 – Recreational pressure on sensitive Sites of Special Scientific Interest

To meet national and local policy requirements (NH/5 and Policy 69) for protecting and enhancing sites of biodiversity value, applications will not normally be permitted where there is likely to be an adverse impact on land within or adjoining such sites. With specific reference to sensitive Sites of Special Scientific Interest, advice issued by Natural England suggests developers of residential schemes of 50 or more units should seek to provide sufficient Suitable Alternative Natural Greenspace, (SANG) to avoid and mitigate recreational pressure within and around the SSSI. SSSIs currently known to be at risk from recreational pressure within the Greater Cambridge area are listed in Annex B of Natural England's advice.

5.6.19. Impact Risk Zones are an online mapping tool developed by Natural England to make an initial assessment of the potential risks to Sites of Special Scientific Interest posed by development proposals. They define zones around each Site of Special Scientific Interest which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal that could potentially have adverse impacts. Impact Risk Zones can be viewed via the [Multi-Agency Geographic Information for the Countryside](#).

5.6.20. Natural England has issued advice to Cambridgeshire Local Planning Authorities in relation to Recreational Pressure Impact Risk Zones relating to sensitive Sites of Special Scientific Interest in Cambridgeshire and the need for green infrastructure within large scale residential developments. Annex B of this advice lists the component Sites of Special Scientific Interest included within the Cambridgeshire Recreational Pressure Impact Risk Zone, of which there are 16 in Greater Cambridge, with a risk category assigned to each Site of Special Scientific Interest. This list could be subject to change, following any new evidence obtained through a specialist visitor survey, for example.

5.6.21. Applicants of developments within the Impact Risk Zone of Wicken Fen Special Area of Conservation should seek advice from the National Trust regarding potential recreational pressure impacts and mitigation measures.

5.6.22. Where a development location triggers a recreational pressure Impact Risk Zone on the [Multi-Agency Geographic Information for the Countryside](#) plan, a pop-up note will appear advising developers of residential proposals of the need for an assessment of recreational pressure effects on the relevant SSSI and the provision of measures to mitigate potential adverse impact. Whilst current Local Plan policies do not set

5.6. Application stage – validation requirements for biodiversity information (continued)

requirements in respect of SANG, developers need to consider how to implement this detailed advice from Natural England, in conjunction with the Councils' Open Space standards to provide access to sufficient greenspace to meet daily recreational needs of new residents. It is expected developers will seek further advice on this issue from Natural England's [Discretionary Advice Service](#).

- 5.6.23.** Non statutory Local Wildlife Sites can also be impacted by increased recreational pressure. Negative impacts will need to be recognised and addressed as a material consideration of any nearby development proposals.

Determination of planning applications

- 5.6.24.** The Councils need certainty of likely impacts on a Biodiversity Site or protected or Priority species prior to determination to ensure that appropriate and effective mitigation measures can be secured either by a condition of any consent or under a mitigation licence from Natural England.
- 5.6.25.** To support determination of planning applications, the Councils therefore expect adequate ecological information to be provided. Where no ecological report has been submitted and there is a likelihood of biodiversity being present and affected by a proposal, applicants will be requested to provide reasonable information in line with [Government Standing Advice](#) which could cause delays, for example, waiting for surveys to be carried out in the appropriate season.

If, despite any request from the Councils, this is not provided to give certainty of likely impacts and details of effective and deliverable mitigation measures, the Councils may refuse an application rather than requiring amendments to avoid impacts.

- 5.6.26.** Where ecology reports include recommendations for further surveys, these will be needed prior to determination. The Councils encourage applicants to ensure that recommendations for mitigation and compensation measures have been embedded into the design of a proposal and that they confirm delivery at the appropriate stage to support determination of a planning application. The above is relevant to Outline Planning Applications too.
- 5.6.27.** Where impacts on biodiversity will be minimised such that the proposal is acceptable, all ecological mitigation, compensation and enhancements to deliver measurable net gain for biodiversity will either be a condition of the consent or included in a legal agreement. This will not include protected species surveys as this information is needed prior to determination.
- 5.6.28.** Updated protected species surveys and mitigation strategies will need to be submitted at reserved matters stage for any measures not fully detailed in the information provided to support determination of outline or phased applications.

5.7. Construction stage

Construction and the need for protection of features and ecological supervision

5.7.1. The construction process often involves clearance of vegetation on site which has the potential for impacts on biodiversity and there is therefore a need to manage the risks to wildlife. A process is also needed to ensure that all of the essential mitigation measures identified within the Ecological Impact Assessment are put in place in the right way and at the right time.

5.7.2. A Construction Environment Management Plan: Biodiversity will be required by condition for many developments. The requirement for and timing of this will be decided on a case-by-case basis and include details of all necessary ecological mitigation measures, including protection of retained habitats and requirements for ecological supervision during works on site using a suitably experienced Ecological Clerk of Works. The details required are specified in model condition D.4.1 of BS42020:2013.

5.8. Post-construction stage

Management plans, monitoring and enforcement

5.8.1. Where habitats are retained and created within a development site boundary, the Councils will seek to secure their protection during the construction process and their long-term management via conditions of any consent. The Councils will require relevant details to be provided within a Landscape and Ecological Management Plan, either at submission or secured by condition. This type of planning condition will need details of all ecological mitigation measures and should be illustrated together with other landscape measures and there should be no conflict between objectives.

5.8.2. Where species are predicted to be affected by development proposals and habitat to support their population is retained or created on site, such as receptor sites for translocated animals, the Councils will seek to include monitoring of the effectiveness

of mitigation secured. This will be separate from any legal requirement attached to a licence approved by Natural England and will be secured by a condition of any consent. Additional monitoring may be required for novel mitigation solutions, the outcomes of which should be made available to the wider ecological consultancy industry where appropriate.

5.8.3. All management plans should include appropriate monitoring to ensure effectiveness and should include a process for remediation and review for any measures that have not been effective. The results of such monitoring should be reported to the Councils for review of management.

5.8.4. To deliver Biodiversity Net Gain, sites will require careful design, zoning and management to ensure there are no recreational conflicts with the proposed areas for habitat creation. The Environment Act 2021 will require an audit trail for the delivery of Biodiversity Net Gain commitments for a period of up to 30 years.

6. Appendices

- Appendix 1 Local Plan policies to be supported by this Supplementary Planning Document
- Appendix 2 Protected species and ecological survey seasons

Appendix 1 Local Plan policies to be supported by this Supplementary Planning Document

Chapter 4, Climate Change.

Policy CC/8, Sustainable Drainage Systems

Development proposals must incorporate appropriate sustainable surface water drainage systems (SuDS) appropriate to the nature of the site. Development proposals will be required to demonstrate that:

- b) Opportunities have been taken to integrate sustainable drainage with the development, create amenity, enhance biodiversity, and contribute to a network of green (and blue) open space.
- d) Maximum use has been made of low land take drainage measures, such as rainwater recycling, green roofs, permeable surfaces, and water butts.

Chapter 5, Delivering High Quality Places.

Policy HQ/1, Design Principles

“All new development must be of high-quality design, with a clear vision as to the positive contribution the development will make to its local and wider context. As appropriate to the scale and nature of the development, proposals must:

...

Include high quality landscaping and public spaces that integrate the development with its surroundings, having a clear definition between public and private space which provide opportunities for recreation, social interaction as well as support for healthy lifestyles, biodiversity, sustainable drainage and climate change mitigation.”

Chapter 6, Built and Natural Environment.

Policy NH/3, Protecting Agricultural Land

1. “Planning permission will not be granted for development which would lead to the irreversible loss of Grades 1, 2 or 3a agricultural land unless:
 - a) Land is allocated for development in the Local Plan.
 - b) Sustainability considerations and the need for the development are sufficient to override the need to protect the agricultural value of the land.
2. Uses not involving substantial built development, but which take agricultural land will be regarded as permanent unless restricted specifically by condition.

When considering proposals for the change of use or diversification of farmland, particular consideration shall be given to the potential for impact upon Priority Species and Habitats.”

Chapter 6, Built and Natural Environment.

Policy NH/4, Biodiversity

1. “Development proposals where the primary objective is to conserve or enhance biodiversity will be permitted.
2. New development must aim to maintain, enhance, restore, or add to biodiversity. Opportunities should be taken to achieve positive gain through the form and design of development. Measures may include creating, enhancing, and managing wildlife habitats and networks, and natural landscape. The built environment should be viewed as an opportunity to fully integrate biodiversity within new development through innovation. Priority for habitat creation should be given to sites which assist in the achievement of targets in the Biodiversity Action Plans (BAPs) and aid delivery of the Cambridgeshire Green Infrastructure Strategy.
3. If significant harm to the population or conservation status of a Protected Species, Priority Species¹ or Priority Habitat resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission will be refused.
4. Where there are grounds to believe that a proposal may affect a Protected Species, Priority Species or Priority Habitat, applicants will be expected to provide an adequate level of survey information and site assessment to establish the extent of a potential impact. This survey information and site assessment shall be provided prior to the determination of an application.

5. Previously developed land (brownfield sites) will not be considered to be devoid of biodiversity. The reuse of such sites must be undertaken carefully with regard to existing features of biodiversity interest. Development proposals on such sites will be expected to include measures that maintain and enhance important features and appropriately incorporate them within any development of the site.
6. Planning permission will be refused for development resulting in the loss, deterioration, or fragmentation of irreplaceable habitats, such as ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

Climate change poses a serious threat to biodiversity and initiatives to reduce its impact need to be considered.”

Chapter 6, Built and Natural Environment.

Policy NH/5, Site of Biodiversity or Geological Importance

1. “Proposed development likely to have an adverse effect on land within or adjoining a Site of Biodiversity or Geological Importance, as shown on the Policies Map (either individually or in combination with other developments), will not normally be permitted. Exceptions will only be made where the benefits of the development clearly outweigh any adverse impact.
2. In determining any planning application affecting Sites of Biodiversity or Geological Importance the Council will ensure that the intrinsic natural features of particular interest are safeguarded or enhanced having regard to:
 - a) The international, national or local status and designation of the site;
 - b) The nature and quality of the site’s features, including its rarity value;
 - c) The extent of any adverse impacts on the notified features;

- d) The likely effectiveness of any proposed mitigation with respect to the protection of the features of interest;
- e) The need for compensatory measures in order to re-create on or off the site features or habitats that would be lost to development.

Where appropriate the Council will ensure the effective management of designated sites through the imposition of planning conditions or Section 106 agreements as appropriate.”

Chapter 6, Built and Natural Environment.

Policy NH6, Green Infrastructure

1. The Council will aim to conserve and enhance green infrastructure within the district. Proposals that cause loss or harm to this network will not be permitted unless the need for, and benefits of the development demonstrably, and substantially outweigh any adverse impacts on the district’s green infrastructure network.
2. The Council will encourage proposals which: a. Reinforce, link, buffer and create new green infrastructure; and b. Promote, manage, and interpret green infrastructure and enhance public enjoyment of it.
3. The Council will support proposals which deliver the strategic green infrastructure network and priorities set out in the Cambridgeshire Green Infrastructure Strategy, and which deliver local green infrastructure.

All new developments will be required to contribute towards the enhancement of the green infrastructure network within the district. These contributions will include the establishment, enhancement and the on-going management costs.”

Chapter 6, Built and Natural Environment.

Policy NH/7, Ancient Woodlands and Veteran Trees

1. “Planning permission will be refused for development resulting in the loss or deterioration of ancient woodland (as shown on the Policies Map) or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

Development Plan Document. Local Development Framework, Northstowe Area Action Plan. July 2007.

Policy NS/2 Development Principles

Development proposals affecting ancient woodland or veteran trees will be expected to mitigate any adverse impacts, and to contribute to the woodland’s or veteran trees management and further enhancement via planning conditions or planning obligations.”

“Plans to be Approved:

...

The town of Northstowe will be developed:
 h. Making drainage water features an integral part of the design of the town and its open spaces, so that they also provide for amenity, landscape, biodiversity and recreation.”

Development Plan Document. Local Development Framework, Northstowe Area Action Plan. July 2007.

Policy NS/12 Landscape Principles

“The Landscape Strategy will:

...

b) Ensure a high degree of connectivity between the new town and wider countryside for wildlife and people, including extending the rights of way network (public footpaths and bridleways);

...

f) Create a network of green spaces which contribute to legibility, are pleasant, attractive, and beneficial to wildlife, and integrate well with the wider countryside;

g) Enable landscaped areas to provide an environment suitable to mitigate any adverse wildlife impacts and to maximise the benefits to wildlife thus increasing biodiversity.

2. Construction spoil retained on site must be distributed in a manner appropriate to the local topography and landscape character, and can be used for noise mitigation, flood risk management or biodiversity enhancement.”

Development Plan Document. Local Development Framework, Northstowe Area Action Plan. July 2007.

Policy NS/13 Landscape Treatment of the Edges of Northstowe

“The Eastern Water Park:

A landscaped water park with appropriate planting and footpaths will be provided on the other edge of Northstowe to the east along the St Ives railway. The water park will provide an attractive amenity for the town and a landscape buffer to the open countryside. It will also provide opportunities to create wildlife habitats and thus increase biodiversity.”

Development Plan Document. Local Development Framework, Northstowe Area Action Plan. July 2007.

Policy NS/14 Landscaping within Northstowe

“Green Corridors

...

3. They will have landscaping and biodiversity value and also perform a recreational function for both informal recreation and children’s play. Public access will include provision for walking, cycling and horse riding.

Road and bus crossings through the Green Corridors will be designed to limit any adverse safety implications for people and be low key in character to limit adverse effects on the landscape. Safe and appropriate crossing facilities for wildlife will also be provided, such as tunnels under roads and ditches alongside roads where appropriate.”

Development Plan Document. Local Development Framework, Northstowe Area Action Plan. July 2007.

Policy NS/16 Existing Biodiversity Features

“Biodiversity Surveys:

1. Developers will be required to undertake a full programme of ecological survey and monitoring prior to the commencement of construction. This work should conclude by proposing a strategy for the protection and enhancement of biodiversity, and Biodiversity Management Plans, to establish:

- a. Which areas of biodiversity will be protected and enhanced;
- b. Appropriate mitigation measures;
- c. Which specific impacts of development will need to be monitored during and after construction.

Further ecological surveys will be required during and after construction, and the Biodiversity Strategy and Management Plans will be reviewed in the light of surveys and monitoring.

Management Strategy:

2. The developer will be required to develop a Management Strategy to ensure high quality, robust and effective implementation, adoption, and maintenance of the biodiversity areas.

Retention of Existing Features:

Existing features including trees, tree plantations and the lake in the southern section of the airfield and the existing ponds in the golf course will be retained as biodiversity and landscape features where such features can make a significant contribution to the urban environment or to the biodiversity of the site.”

Development Plan Document. Local Development Framework, Northstowe Area Action Plan. July 2007.

Policy NS/17 New Biodiversity Features

“Eastern Water Park:

1. The water park along the eastern boundary of the town and west of the disused railway, which will be created to provide for the attenuation of surface water flows, will be managed to enhance the biodiversity of Northstowe by providing an extensive wetland habitat and to maximise its value to key species.

Southern Parkland Country Park:

2. A parkland landscape will be created between Northstowe and Oakington to provide a substantial resource of trees, grassland, and other areas of semi-natural vegetation. This area will be designed and managed for its wildlife value.

Green Corridors Through and Beyond the Town:

3. Green corridors will be established through the town to connect where possible to biodiversity features and corridors beyond the town.

Creating Habitats Within the Urban Area:

Every opportunity will be taken to incorporate features within the urban fabric, through urban design and through the use of sympathetic materials to create wildlife habitats.”

Development Plan Document. Local Development Framework, Northstowe Area Action Plan. July 2007.

Policy NS/24 Construction Strategy

Site Access and Haul Roads:

2. A scheme will be introduced to avoid construction vehicles travelling through villages in the locality and to ensure that any haul roads are located, designed and landscaped in such a way as to minimise any noise, smell, dust, visual or other adverse impacts on existing residents and businesses, and on the new residents and businesses at Northstowe. They should also avoid adverse effects on the environmental amenities of biodiversity, rights of way and green spaces. Traffic flows will be monitored to ensure that the public have a mechanism to feedback any concerns that arise during development.

Construction Activities:

Planning conditions will be imposed to minimise the adverse effects of construction activity on residential amenity and the environment”.

Development Plan Document. Local Development Framework, Northstowe Area Action Plan. July 2007.

Policy NS/27 Management of Services, Facilities, Landscape and Infrastructure

“Management strategies for services, facilities, landscape and infrastructure will be submitted to the local planning authority for adoption prior to the granting of outline planning permission to ensure high quality, robust and effective implementation, adoption and maintenance. Landownership for these uses should be as simple as possible, preferably in a single ownership to avoid fragmentation. In particular, there should be a single agreed Management Strategy covering recreation, landscape, and biodiversity. The inclusion of water and drainage features within open spaces would have significant advantages and should therefore be investigated.”

Local Development Framework: Cambridge East Area Action Plan (Feb 2008).

Policy CE/4, The Setting of Cambridge East

Green Corridor:

1. “A green corridor will be retained through the new urban quarter connecting the green spaces of Cambridge to the surrounding countryside, linking from Coldham’s Common to a new country park located to the east of Airport Way and south of Newmarket Road, and also to the National Trust’s Wicken Fen Vision. The green corridor will have width of about 300m and be significantly narrower only where particular justification is provided and the green corridor function is not inhibited. It will open up to a greater width at the Teversham end of the corridor, where an informal countryside character will be provided to help to maintain the individual identity of the village.

It will have landscaping and biodiversity value and also perform a recreational function for both informal recreation and children’s play.”

Local Development Framework: Cambridge East Area Action Plan (Feb 2008).

Policy CE/4, The Setting of Cambridge East. Policy CE/13 Landscape Principles

Landscape Strategy:

1. “The Strategy will:
 - a. To ensure a high degree of connectivity between the new urban quarter and the wider countryside for wildlife and people;

...

Enable the landscaped areas within the urban quarter to provide an environment suitable to mitigate against any adverse wildlife impacts and to maximise the benefits to wildlife thus increasing biodiversity”

Local Development Framework: Cambridge East Area Action Plan (Feb 2008).

Policy CE/14, Landscaping within Cambridge East

Green Fingers:

3. “They will have landscaping and biodiversity value and also perform a recreational function for both informal recreation and children’s play. Public access will include provision for walking, cycling and horse riding.

Road and bus crossings through the green fingers will be designed to limit any adverse safety implication for people and be low key in character to limit adverse effects on the landscape. Safe and appropriate crossing facilities for wildlife will also be provided, such as tunnels under roads and ditches alongside roads where appropriate”.

Local Development Framework: Cambridge East Area Action Plan (Feb 2008).

Policy CE/16, Biodiversity

1. “The development of Cambridge East will have regard to the conservation and enhancement of biodiversity, and every opportunity should be taken to achieve positive gain to biodiversity through the form and design of development. As appropriate, measures will include creating, enhancing, and managing wildlife habitats and natural landscape. Priority for habitat creation should be given to sites which assist in achieving targets in the Biodiversity Action Plans (BAPs).
2. Development will not be permitted if it would have an adverse impact on the population or conservation status of protected species or priority species or habitat unless the impact can be adequately mitigated by measures required by Section 106 agreements or planning conditions.
3. Where there are grounds to believe that development proposals may affect a protected species or priority species or habitat, applicants will be expected to provide an adequate level of survey information to establish the extent of the potential impact together with possible alternatives to the development, mitigation schemes and / or compensation measures.
4. Development proposals will take account of the impact, either direct or indirect, on people’s opportunity to enjoy and experience nature on a site together with opportunities to improve public access to nature.

Exceptionally, where the economic or social benefits of a proposal outweigh harm to an important site or species, the approach will be first to avoid or minimise the harm, then to seek mitigation of the impact, and finally to secure appropriate compensation for any residual impact in order to ensure no net loss of biodiversity. Planning conditions and obligations will be used as appropriate to secure this.”

Local Development Framework: Cambridge East Area Action Plan (Feb 2008).

Policy CE/17, Existing Biodiversity Features

Biodiversity Surveys:

1. “Developers will be required to undertake a full programme of ecological survey and monitoring prior to the commencement of construction. This work should conclude by proposing a strategy for the protection and enhancement of biodiversity, and Biodiversity Management Plans, to establish:
 - a. Which areas of biodiversity will be protected and enhanced;
 - b. Appropriate mitigation measures;
 - c. Which specific impacts of development will need to be monitored during and after construction.

Further ecological surveys will be required during and after construction, and the Biodiversity Strategy and Management Plans will be reviewed in the light of surveys and monitoring.

Management Strategy:

2. The developer will be required to develop a Management Strategy to ensure high quality, robust and effective implementation, adoption, and maintenance of the biodiversity areas.

Retention of Existing Features:

3. Existing features, including trees in the Park and Ride site will be retained as biodiversity, and landscape features.
4. Development will not be permitted if it will have an adverse impact on a Local Nature Reserve (LNR), a Country Wildlife Site (CWS), or a City Wildlife Site (CiWS) unless it can be clearly demonstrated that there are reasons for the proposal, which outweigh the need to safeguard

the substantive nature conservation of the site. Where development is permitted, proposals should include measures to minimise harm, to secure suitable mitigation and / or compensatory measures, and where possible enhance the nature conservation value of the site affected through habitat creation and management.

New Biodiversity Features:

5. As part of the development of the urban quarter, new biodiversity features will be provided in the green corridor and green fingers, together with, in the country park, a substantial resource of trees, grassland and other areas of semi-natural vegetation which is sympathetic to local landscape character.

Creating Habitats within the Urban Area:

Every opportunity will be taken to incorporate features within the urban fabric, through urban design and through the use of sympathetic materials to create wildlife habitats.”

Local Development Framework: Cambridge East Area Action Plan (Feb 2008).

Policy CE/29, Construction Strategy

Site Access and Haul Roads:

2. “A scheme will be introduced to avoid construction traffic travelling through residential areas in the city and villages in the locality and ensure that any haul roads are located, designed and landscaped in such a way as to minimise any noise, smell, dust, visual or other adverse impacts on existing residents and businesses, and on the new residents and businesses at Cambridge East. They should also avoid adverse effects on the environmental amenities of biodiversity, rights of way and green spaces. Traffic flows will be monitored to ensure that the public have a mechanism to feedback any concerns that arise during development.

Construction Activities:

Planning conditions will be imposed to minimise the adverse effects of construction activity on residential amenity and the environment”.

Local Development Framework:

Cambridge East Area Action Plan (Feb 2008).

Policy CE/31, Management of Services, Facilities, Landscape and Infrastructure

“Management strategies for services, facilities, landscape and infrastructure will be submitted to the local planning authority for adoption prior to the granting of outline planning permission to ensure high quality, robust and effective implementation, adoption and maintenance. Landownership for these uses should be as simple as possible, preferably in a single ownership to avoid fragmentation. In particular, there should be a single agreed Management Strategy covering recreation, landscape, and biodiversity. The inclusion of water and drainage features within open spaces would have significant advantages and should therefore be investigated.”

Local Development Framework: Cambridge East Area Action Plan (Feb 2008).

Policy CE/33, Infrastructure Provision

1. “Planning permission will only be granted at Cambridge East where there are suitable arrangements for the improvement or provision of infrastructure necessary to make the scheme acceptable in planning terms. Contributions will be necessary for some or all of the following:

...

Landscaping and biodiversity”

Local Development Framework: Cambridge Southern Fringe Area Action Plan, February 2008.

Policy CSF/2 Development and Countryside Improvement Principles

“Trumpington West will be developed:

...

9. To achieve a net increase in biodiversity across the site;

10. Making drainage water features an integral part of the design of the urban extension and its open spaces, so they also provide for amenity, landscape, biodiversity, and recreation.

...

Trumpington West will connect the green spaces of Cambridge to the surrounding countryside, maintain a Green Corridor along the River Cam, and provide landscape, biodiversity and public access enhancements in the surrounding countryside.”

Local Development Framework: Cambridge Southern Fringe Area Action Plan, February 2008.

Policy CSF/5 Countryside Enhancements Strategy

“1. Planning permission for development at Trumpington West will include a planning obligation requirement for contributions to the implementation of a Countryside Enhancement Strategy which will create an enhanced gateway into the City between Hauxton Road and the River Cam and which will comprise:

- a. The creation of a country park, comprising new meadow grassland, to the east of the River Cam, both north and south of the M11, from Grantchester Road to Hauxton Mill;

- b. Hedgerow planting on field boundaries in the agricultural land between Hauxton Road and the Trumpington Meadows Country Park;

...

- d. Measures to protect and enhance wildlife habitats, including managing public access to the riverbanks;
- e. Noise attenuation on the northern side of the M11 through the creation of new landscape features which are compatible with the river valley character.

2. A Countryside Enhancement Strategy will be prepared for the area bounded by the Cambridge City boundary, Babraham Road, Haverhill Road, and the edge of the built area of Great Shelford and Stapleford. The Strategy will comprise:

- f. New copses on suitable knolls, hilltops, and scarp tops;
- g. Management and creation of chalk grassland;
- h. Management of existing shelter belts;
- i. New mixed woodland and shelter belts;
- j. Creation of a landscape corridor along Hobson’s Brook;
- k. Reinforcement and planting of new hedgerows;
- l. Roadside planting.

3. The Countryside Strategies will include integrated proposals for landscape, biodiversity, recreation, and public access improvements, which will be compatible with long-term agricultural production to create enhanced gateways into the City. Provision will be made for maintenance of landscaping and replacement of diseased, dying, and dead stock for a period of 10 years, and details of long-term management thereafter.”

Local Development Framework: Cambridge Southern Fringe Area Action Plan, February 2008.

Policy CSF/12 Landscape Principles

1. "A Landscape Strategy for Trumpington West must be submitted and approved prior to the granting of planning permission, of a level of detail appropriate to the type of application. It will be implemented as part of the conditions / planning obligations for the development of the urban extension. The strategy will:
 - f. Enable the landscaped areas within the urban extension to provision an environment suitable to mitigate any adverse wildlife impacts and to maximise the benefits to wildlife thus increasing biodiversity;
 - h. Make best use of and enhance existing tree and hedge resources as a setting for the development."

Local Development Framework: Cambridge Southern Fringe Area Action Plan, February 2008.

Policy CSF/13 Landscaping within Trumpington West

Green Fingers:

1. "They will have landscaping and biodiversity value and also perform a recreational function for both informal recreation and children's play. Public access will include provision for walking, cycling and horse riding.

Road and bus crossings through the green fingers will be designed to limit any adverse safety implication for people and be low key in character to limit adverse effects on the landscape. Safe and appropriate crossing facilities for wildlife will also be provided, such as tunnels under roads and ditches alongside roads where appropriate"

Local Development Framework: Cambridge Southern Fringe Area Action Plan, February 2008.

Policy CSF/15 Enhancing Biodiversity

1. "Outline planning applications for development at Trumpington West will be accompanied by a comprehensive ecological survey of flora and fauna. This will include land bounded by the River Cam and Hauxton Road as far south as Hauxton Mill.

Managing Enhancing Biodiversity:

2. All open areas will be managed and landscaped to encourage wildlife in locally distinctive habitats. Sensitive habitats will be protected by limiting public access to specified areas.
3. A Biodiversity Management Strategy will demonstrate how biodiversity will be enhanced and how local communities will be involved. A project officer will be funded to implement the strategy through a planning obligation.

Green Fingers and the Countryside:

Connections will be provided for Green Fingers within the urban extensions to the surrounding countryside by enhanced landscaping, planting and the creation of wildlife habitats to provide links to larger scale wildlife habitats to provide links to larger scale wildlife habitats further afield including Nine Wells, the Magog Down, Wandlebury Country Park, the River Cam corridor, Coton Country Park, Wimpole Hall and Wicken Fen."

Local Development Framework: Cambridge Southern Fringe Area Action Plan, February 2008.

Policy CSF/22 Construction Strategy

Site Access and Haul Roads:

1. "A scheme will be introduced to avoid construction traffic travelling through Trumpington and villages in the locality and ensure that any haul roads are located, designed and landscaped in such a way as to minimise any noise, smell, dust, visual or other adverse impacts on existing residents and businesses, and on the new residents and businesses at Trumpington West. They should also avoid adverse effects on the environmental amenities of biodiversity, rights of way and green spaces. Traffic flows will be monitored to ensure that the public have a mechanism to feedback any concerns that arise during development.

...

Construction Activities:

Planning conditions will be imposed to minimise the adverse effects of construction activity on residential amenity and the environment"

Local Development Framework: Cambridge Southern Fringe Area Action Plan, February 2008.

Policy CSF/24 Management of Services, Facilities, Landscape and Infrastructure

- "1. Management strategies for services, facilities, landscape, and infrastructure will be submitted to the local planning authority for adoption prior to the granting of outline planning permission to ensure high quality, robust and effective implementation, adoption, and maintenance. Landownership for these uses should be as simple as possible, preferably in a single ownership to avoid fragmentation. In particular, there should be a single agreed Management Strategy

covering recreation, landscape, and biodiversity. The inclusion of water and drainage features within open spaces would have significant.

Local Development Framework: North West Cambridge Area Action Plan, October 2009.

Policy NW2: Development Principles

- "2. Development proposals should, as appropriate to their nature, location, scale, and economic viability: f) Protect and enhance the geodiversity and biodiversity of the site and incorporate historic landscape and geological features;
3. Planning permission will not be granted where the proposed development or associated mitigation measures would have an unacceptable adverse impact:
 - n) On biodiversity, archaeological, historic landscape, and geological interests;
 - s) On protected trees and trees of significance".

Local Development Framework: North West Cambridge Area Action Plan, October 2009.

Policy NW4: Site and Setting

"Land between Madingley Road and Huntingdon Road, comprising two areas totalling approximately 91ha, as shown on the Proposals Map, is allocated for predominantly University-related uses. A strategic gap is retained between the two parts of the site to ensure separation is maintained between Cambridge and Girton village and to provide a central open space for reasons of biodiversity, landscape, recreation and amenity, whilst ensuring a cohesive and sustainable for of development."

Local Development Framework: North West Cambridge Area Action Plan, October 2009.

Policy NW24: Climate Change & Sustainable Design and Construction

- “1. Development will be required to demonstrate that it has been designed to adapt to the predicted effects of climate change;
2. Residential development will be required to demonstrate that:
- b) All dwellings approved on or after 1 April 2013 will meet Code for Sustainable Homes Level 5 or higher;
- c) There is no adverse impact on the water environment and biodiversity as a result of the implementation and management of water conservation measures.
3. Non-residential development and student housing will be required to demonstrate that:
- d) it will achieve a high degree of sustainable design and construction in line with BREEAM “excellent” standards or the equivalent if this is replaced;
- e) It will incorporate water conservation measures including water saving devices, greywater and/or rainwater recycling in all buildings to significantly reduce potable water consumption; and
- g) There is no adverse impact on the water environment and biodiversity as a result of the implementation and management of water conservation measures.”

Local Development Framework: North West Cambridge Area Action Plan, October 2009.

Policy NW25: Surface Water Drainage

1. “Surface water drainage for the site should be designed as far as possible as a sustainable drainage system (SuDS) to reduce overall run-off volumes leaving the site, control the rate of flow and improve

water quality before it joins any water course or other receiving body;

2. The surface water drainage system will seek to hold water on the site, ensuring that it is released to surrounding water courses at an equal, or slower, rate that was the case prior to development;
3. Water storage areas should be designed and integrated into the development with drainage, recreation, biodiversity, and amenity value; and

Any surface water drainage scheme will need to be capable of reducing the downstream flood risk associated with storm events as well as normal rainfall events. All flood mitigation measures must make allowance for the forecast effects of climate change.”

Cambridge Local Plan 2018

Policy 7: The River Cam

Development proposals along the River Cam corridor should:

- a. include an assessment of views of the river and a demonstration that the proposed design of the development has taken account of the assessment in enhancing views to and from the river;
- b. preserve and enhance the unique physical, natural, historically, and culturally distinctive landscape of the River Cam;
- c. raise, where possible, the quality of the river, adjacent open spaces, and the integrity of the built environment in terms of its impact, location, scale, design, and form;
- d. propose, where possible and appropriate to context, enhancement of the natural resources of the River Cam and offer opportunities for re-naturalisation of the river;
- e. enable, where possible, opportunities for greater public access to the River Cam; and
- f. take account of and support, as appropriate, the tourism and recreational facilities associated with the river.

Cambridge Local Plan 2018

Policy 8: Setting of the city

“Development on the urban edge, including sites within and abutting green infrastructure corridors and the Cambridge Green Belt, open spaces and the River Cam corridor, will only be supported where it:

includes landscape improvement proposals that strengthen or recreate the well-defined and vegetated urban edge, improve visual amenity, and enhance biodiversity.

Cambridge Local Plan 2018

Policy 31: Integrated water management

Development will be permitted provided that:

f) any flat roof is a green or brown roof, providing that it is acceptable in terms of its context in the historic environment of Cambridge and the structural capacity of the roof if it is a refurbishment. Green or brown roofs should be widely used in large-scale new communities;

...

development adjacent to a water body actively seeks to enhance the water body in terms of its hydro morphology, biodiversity potential and setting.”

Cambridge Local Plan 2018

Policy 52: Protecting garden land and the subdivision of existing dwelling plots

“Proposals for development on sites that form part of a garden or group of gardens or that subdivide an existing residential plot will only be permitted where: b. sufficient garden space and space around existing dwellings is

retained, especially where these spaces and any trees are worthy of retention due to their contribution to the character of the area and their importance for biodiversity.”

Cambridge Local Plan 2018

Policy 57: Designing new buildings

“High quality new buildings will be supported where it can be demonstrated that they include an appropriate scale of features and facilities to maintain and increase levels of biodiversity in the built environment”.

Cambridge Local Plan 2018

Policy 58: Altering and extending existing buildings

“Alterations and extensions to existing buildings will be permitted where they: do not adversely impact on the setting, character or appearance of listed buildings or the appearance of conservation areas, local heritage assets, open spaces, trees or important wildlife features;”

Cambridge Local Plan 2018

Policy 59: Designing landscape and the public realm

“External spaces, landscape, public realm, and boundary treatments must be designed as an integral part of new development proposals and coordinated with adjacent sites and phases. High quality development will be supported where it is demonstrated that: species are selected to enhance biodiversity through the use of native planting and/or species capable of adapting to our changing climate”.

Cambridge Local Plan 2018

Policy 66: Paving over front gardens

“Proposals for the paving over of front gardens will only be permitted where it can be demonstrated that:

...

c. it will not result in a net loss of biodiversity”

Cambridge Local Plan 2018

Policy 69: Protection of sites of local nature conservation importance

“In determining any planning application affecting a site of biodiversity or geodiversity importance, development will be permitted if it will not have an adverse impact on, or lead to the loss of, part of all of a site identified on the Policies Map. Regard must be had to the international, national, or local status and designation of the site and the nature quality of the site’s intrinsic features, including its rarity.

Where development is permitted, proposals must include measures:

- a. to minimise harm;
- b. to secure achievable mitigation and/or compensatory measures; and
- c. where possible enhance the nature conservation value of the site affected through habitat creation, linkage, and management.

In exceptional circumstances, where the importance of the development outweighs the need to retain the site, adequate replacement habitat must be provided.

Any replacement habitat must be provided before development commences on any proposed area of habitat to be lost.”

Cambridge Local Plan 2018

Policy 70: Protection of priority species and habitats

“Development will be permitted which:

- a. protects priority species and habitats; and
- b. enhances habitats and populations of priority species.

Proposals that harm or disturb populations and habitats should:

- c. minimise any ecological harm; and d. secure achievable mitigation and/or compensatory measures, resulting in either no net loss or net gain of priority habitat and local populations of priority species.

Where development is proposed within or adjoining a site hosting priority species and habitats, or which will otherwise affect a national priority species or a species listed in the national and Cambridgeshire-specific biodiversity action plans (BAPs), an assessment of the following will be required:

- e. current status of the species population;
- f. the species’ use of the site and other adjacent habitats;
- g. the impact of the proposed development on legally protected species, national and Cambridgeshire-specific BAP species, and their habitats; and
- h. details of measures to fully protect the species and habitats identified.

If significant harm to the population or conservation status of protected species, priority species or priority habitat resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission will be refused.”

Cambridge Local Plan 2018

Policy 71: Trees

“Development will not be permitted which involves felling, significant survey (either now or in the foreseeable future) and potential root damage to trees of amenity or other value, unless there are demonstrable public benefits accruing from the proposal which clearly outweigh the current and future amenity value of the trees.

Development proposals should:

- a. preserve, protect, and enhance existing trees and hedges that have amenity value as perceived from the public realm;
- b. provide appropriate replacement planting, where felling is proved necessary; and
- c. provide sufficient space for trees and other vegetation to mature.

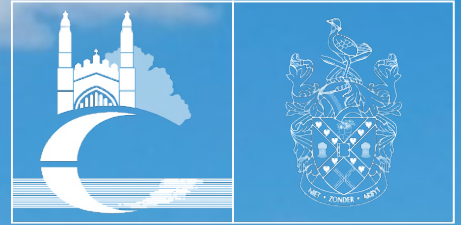
Particular consideration should be given to veteran or ancient trees, as defined by Natural England, in order to preserve their historic, ecological and amenity value.”

Appendix 2 Guidance on protected species and ecological survey seasons


This provides a rough guide to the seasonality of ecological survey to illustrate the potential impact on the submission of information in support of a planning application. A suitably qualified ecologist should always be consulted to provide site specific advice on appropriate methodologies and timing, which may depend on weather conditions.


Table 1 Ecological survey seasons


Ecological Area	Survey Season
Preliminary Ecological Appraisals	Surveys are possible year-round.
Botanical Surveys	As appropriate to plant community from June to August. Marginal opportunities from April to May, and September.
Breeding Birds	Six survey visits across the season from March to June. Marginal opportunity in July.
Wintering Birds	At least monthly from January to February and November to December.
Badgers	Surveys for evidence can be undertaken year-round. Bait marking and sett surveys from February to April and September to November. Breeding season, limited surveying from May to August and December to January. Licensable season for disturbance from July to November.
Bats	Potential Roost Assessment Surveys are possible year-round. Emergence and Activity Surveys from May to September. Marginal opportunities in April and October, depending on temperature.
Hazel Dormice	Nest tube survey with monthly checks throughout season, to achieve minimum level of effort from April to November.
Invertebrates	Optimal survey time April to September.
Reptiles	Weather conditions are important from April to July and September. Marginal opportunities in March, August, and October to November.
Water Voles	Habitat assessment possible year-round. Two surveys required. The first survey from April to June. The second survey from July to September. This identifies breeding territories and latrines. Marginal opportunities for the two surveys from October to November.
Otters	Surveys are possible all year-round.
Great Crested Newts	Habitat assessment possible year-round. Four aquatic surveys which must include two surveys from mid-April to May. eDNA survey season from mid-March to end of June. Marginal opportunities in March, and from July to August.
White Clawed Crayfish	Habitat assessment possible year-round. Netting survey from July to November.





GREATER CAMBRIDGE SHARED PLANNING


 Cambridge City Council, PO Box 700,
Cambridge CB1 0JH

 planning@cambridge.gov.uk

 01223 457 200

 South Cambridgeshire District Council,
South Cambridgeshire Hall, Cambourne Business Park,
Cambourne, Cambridge CB23 6EA

 planning@greatercambridgeplanning.org

 01954 713 694

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Front Cover photo: Cambourne, Cambridgeshire: John Cornell

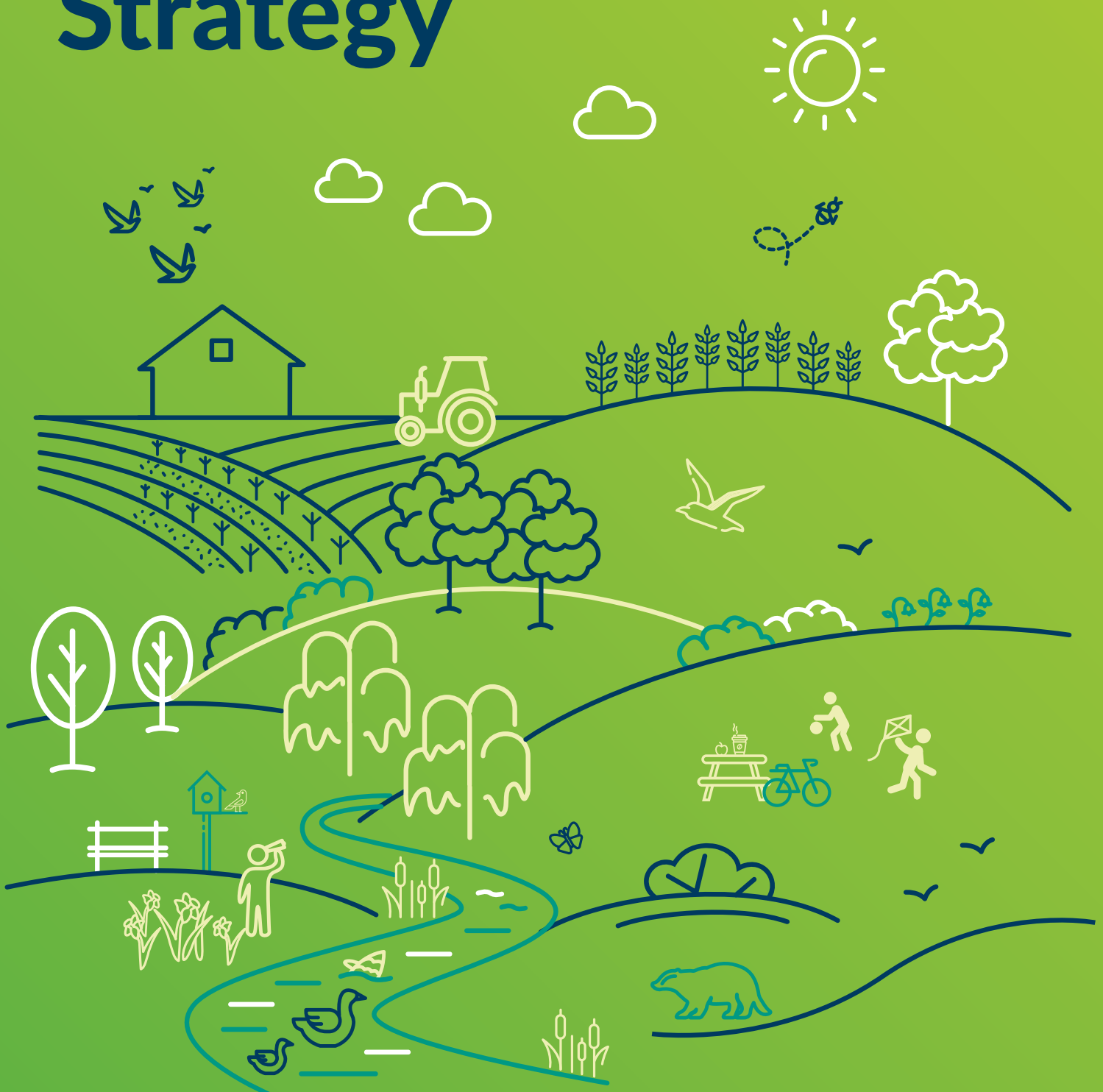
Appendix B ExQ2 1.5 Doubling Nature Strategy



South
Cambridgeshire
District Council

Doubling Nature Strategy

2021



Contents

- | | | | |
|-----------|---|-----------|--|
| 03 | Forewords | 17 | Influence through policies |
| 04 | Introduction | 23 | Using our wider influence |
| 06 | The natural capital of South Cambridgeshire | 26 | Supporting communities to do things for nature |
| 11 | The vision | 30 | What you can do |
| 12 | Our approach | 32 | Further information |
| 13 | Our own estate | | |



Forewords

Cllr Bridget Smith, Leader

The days when we can just take nature for granted are long gone.

The cumulative damage that began with the Industrial Revolution has now reached the point where all of nature is under serious threat and just minimising and mitigating for damage is no longer an option.

We now have no choice but to actively find every opportunity we can to protect and enhance what natural assets we have and to double, as an absolute minimum, the land that is devoted to nature.

If we do this right, we will create well managed natural habitats for both nature and humans to enjoy. We will improve air quality and biodiversity and reduce the damage from climate change.

In South Cambridgeshire we are determined, through everything we do, to create a district where nature comes first and thrives as a consequence.

Cllr Pippa Heylings, Chair of our Climate and Environment Advisory Committee

The global pandemic has highlighted more than ever the value and importance of Nature for our physical and mental wellbeing.

It has also exposed the terrible inequality that exists because of the number of families who do not have close and easy access to wild, open green spaces.

South Cambridgeshire is one of the fastest growing areas in the country and yet is one of the poorest in terms of biodiversity and has one of the smallest areas of land managed for nature, relative to size. The challenge to balance economic growth with measures to protect and enhance nature has never been more urgent.

I am extremely proud of our Doubling Nature Strategy which is a sister document to our Zero Carbon Strategy because the climate and ecological emergencies are interlinked. The Strategy lays out how we will work with our communities, partners and businesses to:

- give nature space and help to reverse declines in habitat and species
- provide more areas for people to enjoy nature and to benefit our health and wellbeing
- improve the quality of air that we breathe
- help manage water for nature
- create more resilience to climate change, and
- boost the economy of our area.

Introduction

The world is facing an ecological crisis with species declining globally, due to human actions, at the fastest rate ever recorded. This is clear from numerous studies.

The Global Assessment on Biodiversity carried out for the United Nations in 2019 reported that 1 million species are threatened with extinction and warned that we are undermining the natural infrastructure on which our modern world depends.

In the UK, the 2019 State of Nature report found populations of the UK's most important wildlife had fallen by 60 per cent in 50 years. On the eve of new global biodiversity targets being set by the international community, the Government's own assessment of progress towards existing UK targets shows that it is failing on 15 out of 20 measures, with particular challenges around the targets on pollution, vulnerable ecosystems outside protected areas, and on restoring degraded ecosystems



The State of Nature 2019 report lists five main threats to biodiversity in the UK: pollution, climate change, changes in agricultural practices, urbanisation and the introduction of non-native species.

Sadly, Cambridgeshire is very much part of this picture. A recent report for the Cambridgeshire Biodiversity Partnership showed massive declines since the 1930s in key habitats such as semi-natural grassland in Cambridgeshire. Once common species such as hares, hedgehogs and turtle doves are at risk of disappearing.

The ecological and climate emergencies are interlinked. This document sets out what we are doing to tackle the ecological crisis and is a sister document to South Cambridgeshire's Zero Carbon Strategy, which we adopted in May 2020. We have already signed up, with our partners in Natural Cambridgeshire, to the vision of doubling nature in Cambridgeshire and Peterborough by 2050. Here we set out our approach to delivering that vision in South Cambridgeshire.

What do we mean by nature?

There are several terms closely connected to nature including biodiversity, natural capital and green infrastructure.

This strategy outlines what we are doing for biodiversity – our wild plants and animals. It also touches on what we are doing to enhance other natural assets in the district, including our soils, air and water. The sum of our natural assets is our natural capital and is essential for our prosperity and wellbeing. It is from our natural capital that vital ecosystem service benefits such as food, water, flooding mitigation and climate regulation derive. The related term ‘green infrastructure’ is more typically used in a planning context to refer to elements of the natural environment in relation to development plans.



The Council’s role

The Council owns only a tiny proportion of the land in South Cambridgeshire. We directly control even less, since almost all the land we own is associated with our Council housing.

Clearly, we cannot double nature on our own and so, as with our Zero Carbon Strategy, this strategy is about how we make best use of the powers and influence we have to encourage, support and, in some cases, compel others to play their part.

Our most significant work in support of the vision to double nature is the work we are doing as the local planning authority through our shared planning service with Cambridge City Council, Greater Cambridge Shared Planning. As Section 7 explains, Greater Cambridge Shared Planning is currently in an intensive period of policy development as preparations are made for a new joint Greater Cambridge Local Plan for Cambridge City and South Cambridgeshire, which will

set out planning policy for the next 20 years. This document provides a snapshot of our current work through planning relating to nature, and an overview of how we are developing new planning policies to enhance this work further. For a detailed picture and emerging up-to-date information, readers are directed to the Greater Cambridge Shared Planning website.

An action plan based on this strategy will be developed in consultation with stakeholders in the coming months. This will be incorporated into our business and service delivery plans for 2021-22 and beyond with progress monitored and reported through our usual processes.



The natural capital of South Cambridgeshire

Natural capital is the sum of our natural assets and ecosystems including soil, trees, air, water and other biodiversity.

Quality of life, wellbeing, resilience to extreme weather conditions and the quality of the homes and neighbourhoods we are building depend on these fully functioning ecosystems and assets.



Soil

Fertile soils are perhaps South Cambridgeshire's greatest natural resource. The soils in the district include boulder clay, chalk and peat, with most land designated as grade 2 or 3 (i.e. good) agricultural land. As such it is put to good use by mainly medium and large-scale farms, producing food, especially arable crops.

Over recent decades technological advances have enabled much improved yields. However, many intensive farming practices, including deep ploughing, rapid crop-rotation, enlarging fields and removing trees and hedges, are resulting in soil erosion and degradation which, if unstopped, will cause productivity to decline. Hedgerows are critically important to connect remaining fragments of biodiversity and they are also threatened by changes in land use and new development pressure.



Trees

South Cambridgeshire has fewer trees than most other areas of the UK, although it does contain some important ancient woodlands. Mainly in the west of the district with some in the southeast, these probably survived historically due to the difficulty of ploughing the heavy boulder clay. Major transport infrastructure routes are a potential threat to some of this long-standing woodland.



Air

Local air quality management is a statutory obligation for local authorities. We monitor key road traffic associated pollutants and publish annual status reports on our website. Where we find that pollutants exceed agreed thresholds, we are able to declare Air Quality Management Areas requiring action to improve air quality; the stretch of the A14 between Bar Hill and Milton is one such area.

National air quality objectives were met at all of our current monitoring locations in our most recent review, including in the A14 AQMA. We continue to develop our understanding of air quality in the district and are extending coverage of our monitoring to include more potential pollution hotspots around the A14 and at other locations in the district.



Water

Cambridgeshire is one of the driest parts of the UK and the rainfall we have is highly variable, which means that water needs to be carefully managed. South Cambridgeshire's three main rivers, the Granta, Cam and Rhee, all originate from chalk springs, which also supply the aquifer that provides much of our drinking water. Chalk streams in the UK are internationally important in the conservation of biodiversity. The UK has about three quarters of the world's chalk streams. However, the amount of water being taken for public water supply is endangering the chalk streams' ability to flow healthily, impacting on the wildlife that lives there.





Biodiversity

Important wildlife habitats in South Cambridgeshire include rivers and streams, especially chalk ones, woodland, scrub, old orchards, hedgerows, arable farmland, ponds, churchyards and cemeteries, lowland chalk grasslands, meadows, pastures and both man-made and natural wetlands.

South Cambridgeshire is one of the areas of highest growth in the country and this has led to higher levels of housing and office construction, including the continued emergence of strategic new towns and supporting transport infrastructure. This urbanisation has led to changes in land-use and has an impact on habitat and biodiversity. Changes in planning policy and standards are particularly important to ensure that key remaining biodiversity is protected where possible and that there is overall environmental net gain.

With much of the land intensively farmed, biodiversity in South Cambridgeshire has been under pressure for many decades. Semi-natural habitats such as permanent pasture have been converted to arable. Field margins have been narrowed, orchards and hedges grubbed up, and seed-rich winter stubbles lost due to spring sowing being replaced by autumn sowing. Wetlands have been 'improved' through drainage. This means that where farms can adopt wildlife-friendly management practices, this is particularly valuable. Examples of these include retaining patches of native vegetation, leaving wider margins in arable fields and creating beetle banks.

With biodiversity under such pressure, areas which are dedicated to nature are of great importance. There are 180 sites designated for conservation in South Cambridgeshire, covering just under 4 per cent of total land area. 59 of these are legally protected, as detailed in the table below. These include a variety of habitats including wetlands, wood park, pasture and ancient woodland. The sole site of international importance is the Eversden and Wimpole Woods Special Area of Conservation, an ancient woodland supporting the rare barbastelle bat.



Designation for nature conservation	Legally protected under UK legislation?	Number of sites in South Cambridgeshire	Area in hectares
Sites of Special Scientific Interest	✓	52	1,667
Special Area of Conservation	✓	1	66
Local Nature Reserve	✓	6	37
County Wildlife Sites	✗	121	1,714*

Detailed information about the natural capital of South Cambridgeshire is available in a major study of green infrastructure in Cambridge City and South Cambridgeshire published in November 2020. Commissioned by Greater Cambridge Shared Planning to inform policy development for the new Greater Cambridge Local Plan, this 206 page report, including 35 maps, outlines the extent and distribution of green infrastructure assets and networks in Greater Cambridge and the opportunities available to enhance and expand these. The report addresses the following seven themes, providing a detailed overview of green infrastructure assets and opportunities for each:

- 1 Landscape, cultural heritage, and sense of place
- 2 Biodiversity and geodiversity
- 3 The water environment
- 4 Access and connectivity
- 5 Recreation and play
- 6 Carbon sequestration
- 7 Agriculture and community food growing

➤ [The Greater Cambridge Green Infrastructure Opportunity Mapping Baseline Report can be viewed for further details.](#)

The Natural Capital Framework

Natural Capital (NC) is the stock of the world's living and non-living natural resources including soils, water, the atmosphere, ecological communities and the natural processes that underpin their functioning. The extent, condition and location of the stock of NC determine the flow of goods and services (known as ecosystem services) that provide benefits to people today and into the future.



These goods and services can be categorised as:

- Provisioning services such as food, fresh water, fuel wood and fibre
- Regulating services such as climate regulation, floodwater attenuation, water purification and reduction of pests and diseases
- Cultural services such as benefits to health and wellbeing, recreation and ecotourism, aesthetic, inspirational and educational benefits and a sense of place and cultural heritage
- Supporting services necessary to produce other ecosystem services such as soil formation, nutrient recycling and pollination.



The content on this page is adapted from the Natural Capital Protocol



The vision

Our vision is to double nature in South Cambridgeshire by 2050 and, in so doing, enable wildlife and people to thrive and businesses to prosper.

This means:



More wildlife-rich habitats



An increase in tree canopy cover



Better accessibility to green space.

Our approach

Although we directly control only a tiny area of land in the district, there are many ways we can influence what happens on land we do not control. Our approach is to use our widening circles of influence to protect and enhance nature in the district.

- We will be an exemplar to others on our own estate through tree planting and nature enhancing measures. This includes our main office at South Cambridgeshire Hall and the communal land associated with our Council housing.
- We will make the most of our direct influence on the natural environment as the local planning authority. We aspire to achieve 20% biodiversity net gain through development. We cannot require this unless and until it is adopted in planning policy or mandated at national level but will encourage all partners to work with us to achieve this aspiration ahead of policy and legal obligations.
- We will use our wider influence through formal and informal partnerships with businesses and community.





Our own estate

Nearly all the land we own is closely associated with our own housing stock. As such, it is referred to by the name of our ring-fenced landlord account, the Housing Revenue Account (HRA).

As well as tenants' homes, gardens, and carparks, HRA land includes:

- 36 hectares of communal land down to grass
- 1.9 hectares of additional land down to grass
- 10,000 metres of hedging
- Several hundred trees of various species, sizes and age
- Streams and watercourses running through HRA land

Our grounds maintenance contractors cut grass regularly throughout the growing season, cut hedges and shrub beds at least once per year, and carry out reactive tree surgery work as needed.

This work is monitored by means of regular formal estate inspections with tenant representatives, parish councils and other interested parties, informal estate inspections throughout the year and checks with tenants and customers to ensure they are satisfied with grounds maintenance and tree surgery work. We work closely with our tenants to identify areas for service improvement.

We are working on various projects to enhance our HRA land for nature.



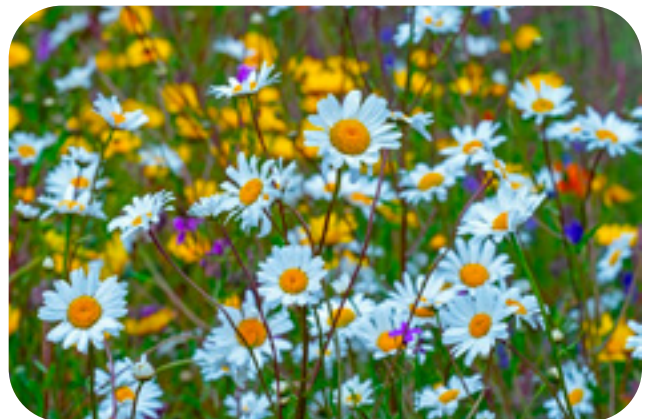
Tree audit

With the support of our grounds maintenance contractor we are undertaking a tree audit. Over the coming year every tree on communal land will be mapped to show its location, size, species and condition. This will allow us to bring forward a proactive programme of tree surgery to prevent problems and improve tree health. This will also identify where we can implement our ambitious tree planting programme and ensure that we are planting the right trees in the right places.



Tree planting

With support and funding from our Repairs and Maintenance contractor under the social value element of our contract with them, we are planting additional trees. We are also supporting residents who wish to plant trees and shrubs on communal land close to their homes.



Wildflowers

We are developing our estate inspection process to identify further opportunities to improve our green spaces including identifying suitable areas to be reseeded with wildflowers.

We will also encourage tenants to make their gardens wildlife-friendly and encourage changes to cutting regimes to allow for wildflower habitat where appropriate to benefit nature.





Commercial sites

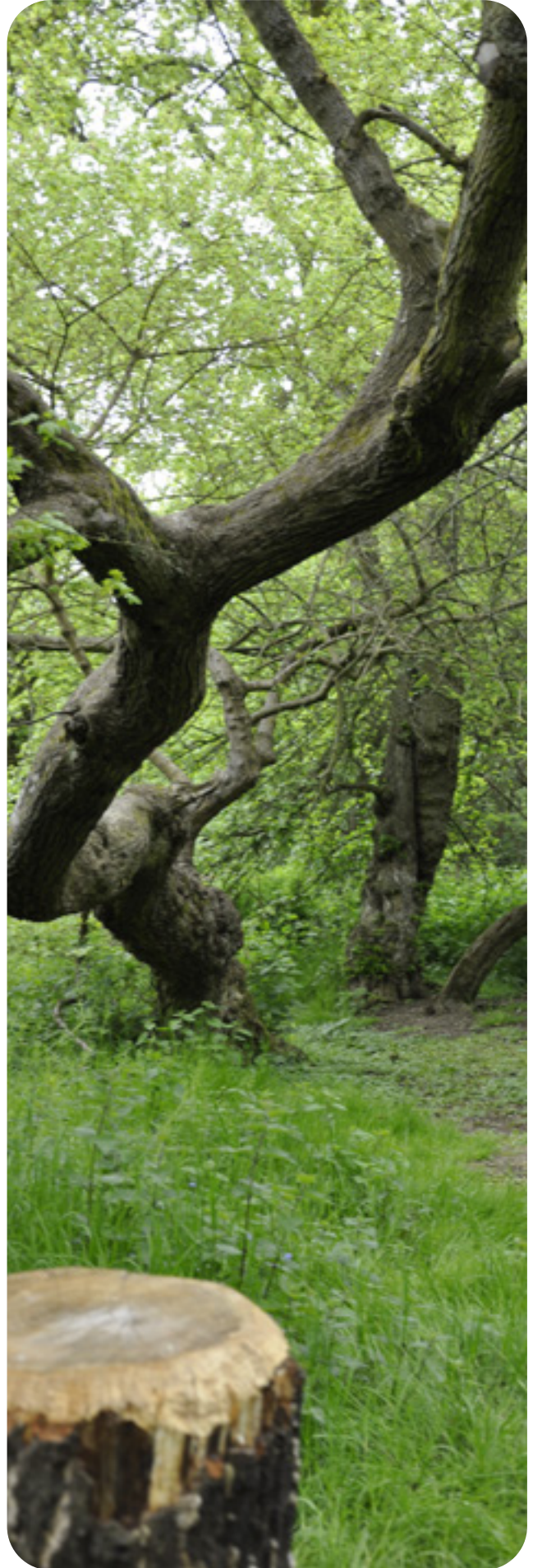
Other than HRA land, we own the site of our main office in Cambourne, South Cambridgeshire Hall, and we have a small portfolio of properties purchased as commercial investments.

We will explore options for enhancing nature as part of any future planned maintenance of development work to these sites.



Milton Country Park

The Council developed this 38 hectare former sand and gravel pit into a country park in the early 1990s. It is now managed by independent charity, Cambridge Sport Lakes Trust, under a long term lease. The park includes woodland, water, and grassy meadow habitats which the Trust manages to support and enhance biodiversity and the natural environment. Visitors to the park can enjoy an abundance of wildlife throughout the year.



There are two categories where we have responsibility for the management of land we do not own, and where we aim to manage this land effectively for nature.



Drainage

We have responsibility (mainly under 19th century legislation) for the upkeep and maintenance of approximately 275km of streams and ditches known as 'awarded watercourses'.

These can support a great deal of wildlife including water beetles, dragonflies, and water voles. We manage these in ways which encourage nature conservation and maintain biodiversity, as well as preventing flooding.

For example, work is carried out in an upstream direction so that disturbed animals can more easily recolonise cleared areas and vegetation is temporarily deposited close to the bank, where possible, so that displaced invertebrates can return to the water.



Churchyards

We currently manage three closed churchyards, St Mary the Virgin Great Shelford, All Saints' Horseheath and St Mary and All Saints' Willingham.

Situated at the heart of the villages, these sites are a great refuge for many species, especially bats, birds and insects. We vary grass cutting regimes and leave space for areas of wildflowers, leave ivy where appropriate and undertake any maintenance work in a sympathetic way.



Nature in new communities

Our role bringing forwards local centres, community facilities and business parks at Northstowe and other major development sites provides opportunities for enhancing nature. As we did with great success in Cambourne, we will use our role to create accessible green space, increase tree canopy cover and establish wildlife habitats.





Influence through policies

As the local planning authority we have major influence in support of the vision to double nature in South Cambridgeshire.

Urbanisation and development are one of the key drivers to change in biodiversity and natural capital. We also have an important statutory role in managing local air quality.

As previously mentioned, our planning function is carried out in partnership with Cambridge City Council through Greater Cambridge Shared Planning. We set local policy and manage development in line with Government policies laid out in the National Planning Policy Framework.

The current South Cambridgeshire Local Plan was adopted in 2018. It includes a suite of policies to help ensure that new development in the area reduces its environmental impact by minimising carbon emissions, flood risk, pollution and pressure on resources such as water and helping to protect and enhance biodiversity. We also have a Biodiversity Supplementary Planning Document that expands on policies to ensure that biodiversity is adequately protected and enhanced throughout the development process. Our planners have been able to work with developers and communities using these policies to secure good outcomes for nature, as shown in the case studies on pages 21 and 22.

Changes at national level have created new opportunities

Since the 2018 Local Plan was adopted, revisions to the National Planning Policy Framework have created new opportunities to achieve net gains for nature.

The current Framework states that planning policy should identify and pursue opportunities for securing measurable gains for biodiversity.

Using the Government's pilot biodiversity accounting tool, we are doing this, and have succeeded in securing biodiversity net gain on several major development sites. The Government has indicated that biodiversity net gain will become mandatory in the new Environment Bill meaning that developers will be **required** to ensure habitats for wildlife are enhanced and left in a measurably better state than they were pre-development in the new Environment Bill.



Greater Cambridge Local Plan

Through the Greater Cambridge Shared Planning Service we are preparing a new joint Local Plan which will set out planning policy in Greater Cambridge (Cambridge City and South Cambridgeshire) for the next 20 years.

Both Cambridge City and South Cambridgeshire District Councils recognise the pressure on the natural environment and are committed to exploring how the new Local Plan can do more to improve natural and semi-natural spaces, known in planning terms as 'green infrastructure', across the area of Greater Cambridge. This will include how we can make use of new powers to mandate biodiversity net gain.

We have made biodiversity and green spaces one of the four big themes that will influence how homes, jobs and infrastructure will be planned in the new Local Plan.

In a novel move which underlines the priority we are giving to our biodiversity and green spaces theme we included a Call for Green Sites in our Call for Sites process. A Call for Sites is a normal part of plan making, providing a way for landowners, developers, individuals and other interested parties to suggest sites for development.

The Call for Green Sites specifically allowed anyone to submit suggestions of land to grow and enhance the green space network, and provided an important signal to landowners of the importance of working with them to identify suitable land, such as for community forests.

Green Infrastructure Opportunity Mapping

To inform the development of policies to deliver our doubling nature aspirations we have commissioned a Green Infrastructure Opportunity Mapping study. The baseline report provides robust evidence on the quantity and quality of existing green infrastructure assets and networks within Greater Cambridge and identifies broad opportunity areas to enhance and expand the network. Later stages of the study will identify a range of deliverable projects to enhance the green infrastructure network. The baseline report can be viewed on the [Greater Cambridge Shared Planning website](#).

Plan making takes a long time due to the need to do it rigorously and in dialogue with our communities. As the new Greater Cambridge Local Plan nears adoption it will carry ever greater weight in planning decisions. However, it is not expected to be finally adopted until 2023.

New Supplementary Planning Documents

Meanwhile, we have developed a new Greater Cambridge Sustainable Design and Construction Supplementary Planning Document to ensure that current policies in the adopted Local Plan are implemented as effectively as possible.

We are also developing a new Biodiversity Supplementary Planning Document to support current policies to protect and enhance biodiversity, and to provide a framework by which mandatory biodiversity net gain can be achieved across all development within the district. We aspire to achieve 20% net gain through development while recognising we cannot require this unless and until adopted in planning policy.



Making policies stick

An important aspect of our influence through policies is in how we ensure that they are implemented effectively. Through the Development Management process our planning team ensures that planning applications address matters relating to the protection and enhancement of nature, and provision of green space.

They impose planning conditions to make otherwise unacceptable developments acceptable, and negotiate planning obligations, also known as section 106 agreements, to secure particular measures that are needed. Examples of successful outcomes for nature are described in case studies on the following pages.

Tackling water quality and scarcity

We know water is an important issue to our local communities, and we have commissioned an Integrated Water Management Study to inform the new Greater Cambridge Local Plan. The interim study (published in November 2020) highlights that there is no environmental capacity for additional growth levels being tested for the new plan to be served by increasing abstraction from the chalk aquifer which supplies much of the water to the Cambridge area.

It also shows that water quality in the surface water bodies assessed under the Water Framework Directive is at best moderate with three bodies assessed as poor. This is mainly because of abstraction, wastewater treatment (point source discharges) and agricultural diffuse pollution. The study will help us to develop a sustainable development strategy for the Local Plan and robust policies on water quality and efficiency, and we are working collaboratively with a number of bodies on this, including Water Resources East who are planning regional solutions to address these issues.

The Council's adopted Local Plan includes a water efficiency policy, with further information included within our Greater Cambridge Sustainable Design and Construction Supplementary Planning Document (SPD).

Action on air quality

We have a statutory responsibility for air quality management. Our new Air Quality Strategy outlines a new approach to monitoring and improving air quality across the district to ensure that air quality issues are considered in all communities.

Key actions on air quality include:

- reviewing and upgrading our air quality monitoring network in line with the new strategy and to reflect the growth in the district
- a new hotspot monitoring initiative to pilot alternative technologies for air quality monitoring
- new equipment installed at Orchard Park School where we are monitoring the levels of exposure to air pollutants in younger children.



Gains for nature through planning

Cambourne

Cambourne is a settlement of three linked villages situated nine miles to the west of Cambridge and has become an exemplar of a large-scale development built with nature and greenspace as a key deliverable. Its Masterplan design was approved in 1996 with work starting on the entirely rural site of former agricultural land in June 1998. The settlement, now of around 10,500 (2019 estimate), originally had total area of 417 hectares of which only 133 hectares (approximately 32% by area) were allocated for housing producing a final density of 32 dwellings per hectare, achieved through the provision of a high proportion of publicly accessible open space. Existing woodland and scrub, lakes, connecting greenways, green open-space, ecology, cycle paths and good access links throughout the development were major drivers of the proposed layout of Cambourne.



The outcome of thoughtful planning guidance by the South Cambridgeshire District Council has been a community that has a well-designed and well-used network of public open space, with associated benefits for biodiversity, residents' health and wellbeing. Cambourne has demonstrated how publicly accessible open space and other Green Infrastructure features can be delivered through a considered and visionary planning process that puts nature at its heart, and not as an after-thought. The design of Cambourne's Green Infrastructure won a Landscape Institute Award in 2010.

Northstowe

Northstowe is a new development that will eventually have up to 10,200 homes and a population of over 26,000, making it a town of a similar size to Huntingdon.

Expanding phases of the development were deemed to significantly impact biodiversity, especially farmland birds, in a way that could not be mitigated within the existing development boundary. So an offsite mitigation strategy providing significant habitat for biodiversity, some distance from the site, was agreed.

A biodiversity impact assessment was undertaken and working with a specialist environmental consultant, the Environment Bank, the extent of compensation and estimated offset requirements for farmland birds were agreed using biodiversity net gain calculations in line with best practice and emerging national policies.

As a result, the purchase of around 72 hectares of farmland, some 6km north east from the development, for conversion to bird-friendly habitats was brokered and agreed with Environment Bank along with a monitoring for perpetuity clause.

As part of the negotiation between the developer (Homes England) and the Local Planning Authority (South Cambridgeshire District Council), not only was a 30 year monitoring effort at the mitigation site agreed, but also an enforcement clause, meaning that the land management practices undertaken on the land by the farmer needed to produce the intended biodiversity net gain, or payments to the farmer would cease and enforcement action be taken. This model of offsite mitigation is likely something that will increase as biodiversity net gain becomes the norm for developments across England and developers and local planning authorities embrace a greener way of delivering their work and protecting the natural environment.



Waterbeach

The village of Waterbeach, five miles north of Cambridge, is the location for a residential development of around 6,500 homes on a 290 hectare former barracks and airfield site, heralded as an outstanding example of how large volume housing development can deliver new landscapes rich in nature. An important aspect of the Waterbeach development has been the vision for delivering a legacy of natural habitats exceeding those destroyed or altered through the development of a site, known as Biodiversity Net Gain (BNG).

Supported by the planning team at Greater Cambridge Shared Planning, the developer Urban and Civic has created four Biodiversity Priority Areas (BPAs). In these, the site's natural assets have been mapped, safeguarded and expanded, creating distinctive habitats linked through smaller scale features to provide an interconnected mosaic of habitat and space for wildlife and people. These BPAs cover nearly 45% of the site and deliver BNG of up to 10%. The nature-led vision for Waterbeach embraces the location's fen-edge landscape and helps shape the development of new wetland habitats and natural areas.

In November 2020 the team behind the Waterbeach development won the Landscape Institute's prestigious Excellence in Masterplanning and Urban Design award in recognition of its strong landscape-led approach, consistent across all scales from sub-regional context to detailed design.





Using our wider influence

Protecting and increasing natural capital is the responsibility and work of numerous organisations in all sectors: private, public and voluntary. We work closely with these organisations through formal and informal partnerships to make the most of our influence.

We are corporate members of the Wildlife Trust for Beds, Cambs and Northants, and contribute funding to the Cambridgeshire and Peterborough Environmental Records Centre, (CPERC).

The OxCam Arc

The Oxford Cambridge Arc, better known as the OxCam Arc, is a corridor of land connecting Oxford, Milton Keynes, Bedford and Cambridge which has been designated by the government as a key economic priority. As one of 31 local authorities contained within the Arc, we are leading the call for the Arc to deliver improvements to the natural environment alongside ambitions for growth. Successful lobbying to this effect led to the inclusion of a fourth OxCam Arc workstream - Environment - which is currently led by Cllr Bridget Smith.

At county level

Natural Cambridgeshire is our Government-recognised Local Nature Partnership. It brings together a broad range of local organisations, businesses and people who aim to help bring about improvements in their local natural environment.

We are represented on the Natural Cambridgeshire Board, and Partnership Forum, by Councillors and staff members, and are collaborating with them on several projects that support the Natural Cambridgeshire vision to double nature. These include:

Landscape Scale Projects

By working closely with communities, landowners and farmers there is potential to create large areas of new habitat. Natural Cambridgeshire has identified six separate landscape-scale projects, three of which sit within, or partly within South Cambridgeshire.

The Cambridge Nature Network aims to create green space for recreation and also link and enhance precious habitats in priority areas in and around Cambridge, including the Gog Magog Hills and River Cam Valley. The West Cambridge Hundreds aims to expand and connect ancient woodlands.

The Connected Fens project aims to safeguard the future of the wildlife and habitats in the Cambridgeshire Fens by ensuring the success of current, pioneering conservation projects and joining them together. These include:

The Fens Biosphere

This multi-sector partnership project is coordinated by Cambridgeshire ACRE and is working towards achieving UNESCO Biosphere status for the Fens. Biosphere reserves involve local communities and interested stakeholders in planning and management of an area in ways which integrate conservation of biodiversity and cultural diversity, and environmentally sustainable economic development.

Parts of South Cambridgeshire lie within the proposed Biosphere buffer zone where activities will be focused on linking people, science and conservation to support the core zone of sites of specific conservation value. Such activities could include trialling new agricultural crops and techniques, encouraging communities to develop new spaces for nature and looking at how water resources can be managed on a landscape scale.

The Future Parks Accelerator

This ambitious collaboration is hosted by Cambridgeshire County Council and aims to find new ways to deliver, manage and fund parks and open space to ensure they are available for everyone for generations to come. The project is one of eight in the UK selected for funding from the National Lottery Fund, the National Trust and the Government's Ministry for Housing, Communities and Local Government.

The Cambridgeshire and Peterborough Doubling Nature Investment Fund

This project is led by the Combined Authority and Natural Cambridgeshire and aims to establish a fund to provide resources for doubling nature.

Developing with Nature Toolkit

This toolkit has been developed by Natural Cambridgeshire to help developers and infrastructure providers demonstrate their commitment to achieving a net biodiversity gain. It comprises a list of 10 things to do for nature, a scoring matrix and guidance notes with links to background information including a summary map of strategic green infrastructure and ecological network priorities in Cambridgeshire. We are signposting developers to the toolkit.



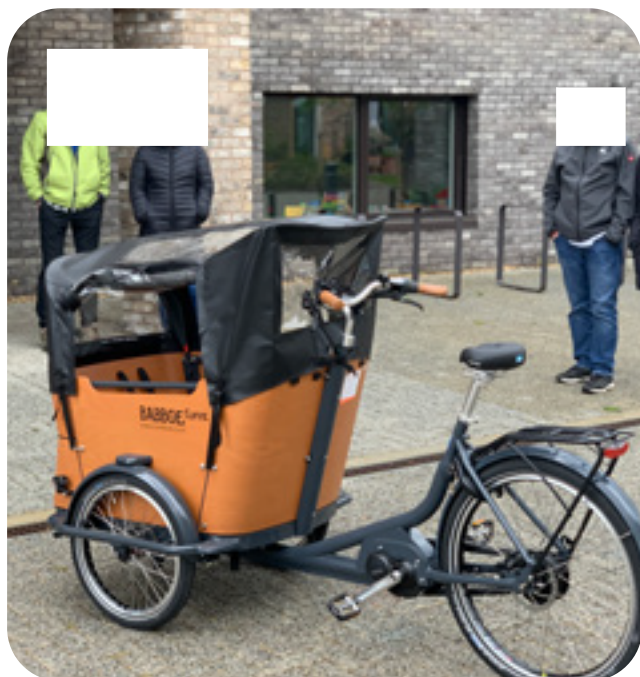
Supporting and encouraging residents and communities to do more for nature

We work closely with the communities in the one hundred plus villages and settlements in South Cambridgeshire.

This puts us in a unique position to promote, support and encourage action for nature. Here are some of the ways in which we do this:

Zero Carbon Communities grant scheme

Our Zero Carbon Communities grant was set up in May 2019 to support communities to get involved in the transition to net zero carbon in South Cambridgeshire. Funded by Business Rates which we retain under the Government's Renewable Energy Project Business Rates Retention Scheme, the grant enables voluntary organisations and parish councils to run projects which engage communities in climate and environment-related issues. In its first year it funded 19 projects, five of which involved planting trees or hedges.



Climate and environment workshops

Alongside our Zero Carbon Communities grant, we run workshops and forums for parish councils and community groups to develop skills and knowledge, network, and share good practice and ideas relating to climate and the environment. A programme of online events is being planned for February 2021 which will include sessions on sustainable agriculture, neighbourhood planning for green spaces, and how to make a parish nature recovery plan.

Tree Wardens Network

We are the registered local coordinator for the Tree Warden Network, a national initiative set up by The Tree Council to promote and support tree wardens. These are volunteers appointed by parish councils or other community organisations who gather information about their local trees, get involved in local tree matters and encourage local practical projects related to the trees and woods.



Three Free Trees

In 2020 we launched a Three Free Trees scheme to encourage more planting of native trees in our villages and towns. We invited parish councils in South Cambridgeshire to apply for a voucher which could be exchanged at a local garden centre for three small trees, or one larger one. Guidance was provided on how to choose appropriate wildlife-friendly species.

Support for community allotments and orchard in new communities

Our Sustainable Communities team supports community development in new settlements such as Northstowe. Part of the team's work has been to encourage and facilitate a community allotment and orchard in Northstowe.

Neighbourhood planning for nature

Neighbourhood planning allows communities to take a proactive approach to deciding the future of the places where they live and work, helping shape the future development and use of land in their neighbourhood.

This includes identifying areas of open space that are of value to the community and putting them forwards to be designated as local green space.

Our **Neighbourhood Planning Toolkit** explains in detail how communities can go about preparing a neighbourhood plan. We keep this updated and will add guidance on how nature can be protected and enhanced through a neighbourhood plan once the Biodiversity Supplementary Planning document has been adopted.

Community woods and parkland

Community woods and parkland allow local organisations and individuals to come together to maintain land and enhance biodiversity. This can be through planting, woodland management such as coppicing, recording species and maintaining features such as paths and culverts. They also provide the wider community with access to spaces for informal recreation and enjoying nature.

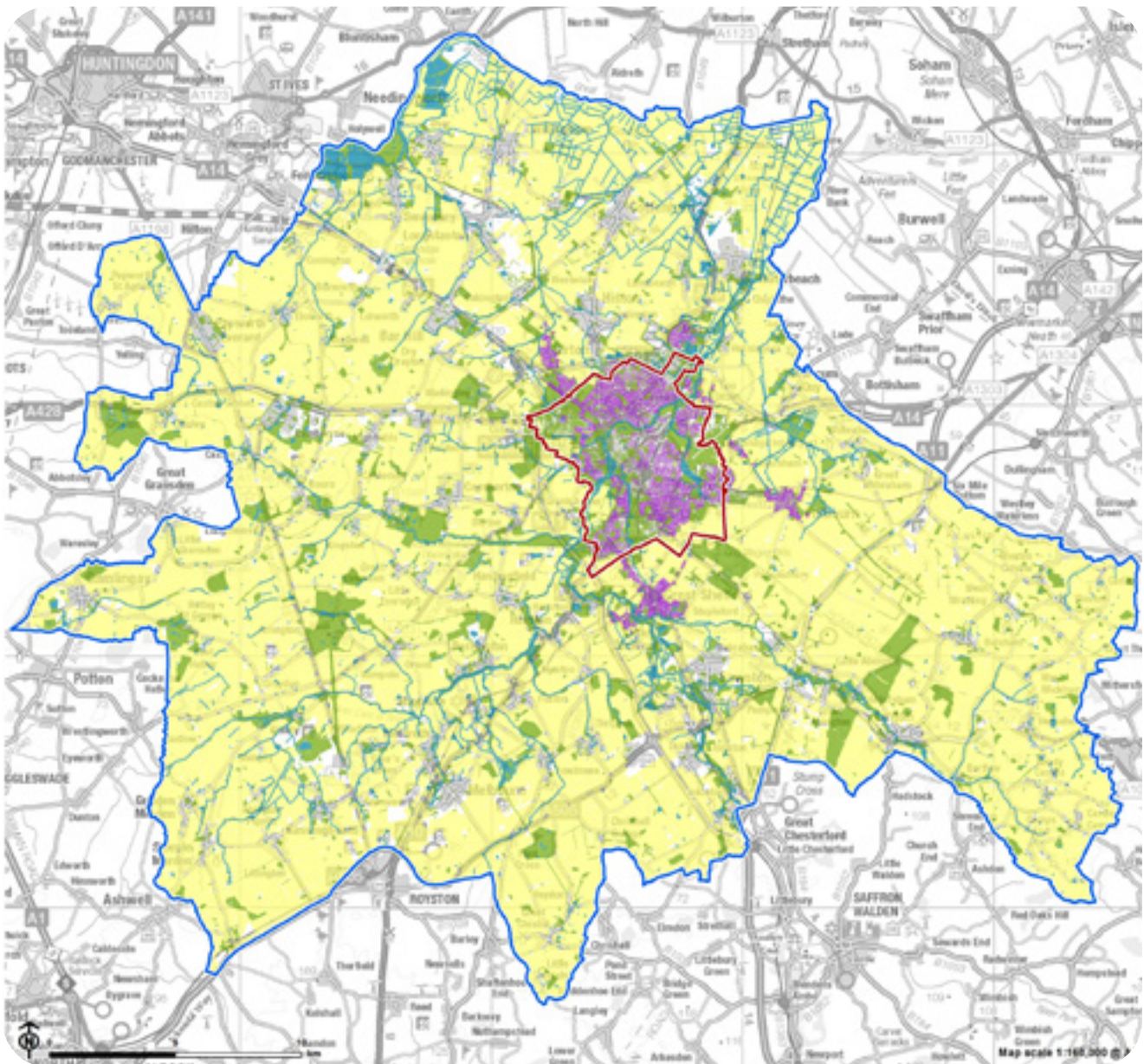
We will continue to support communities to develop and deliver plans for community forests and woodlands.



Green Infrastructure in Greater Cambridge

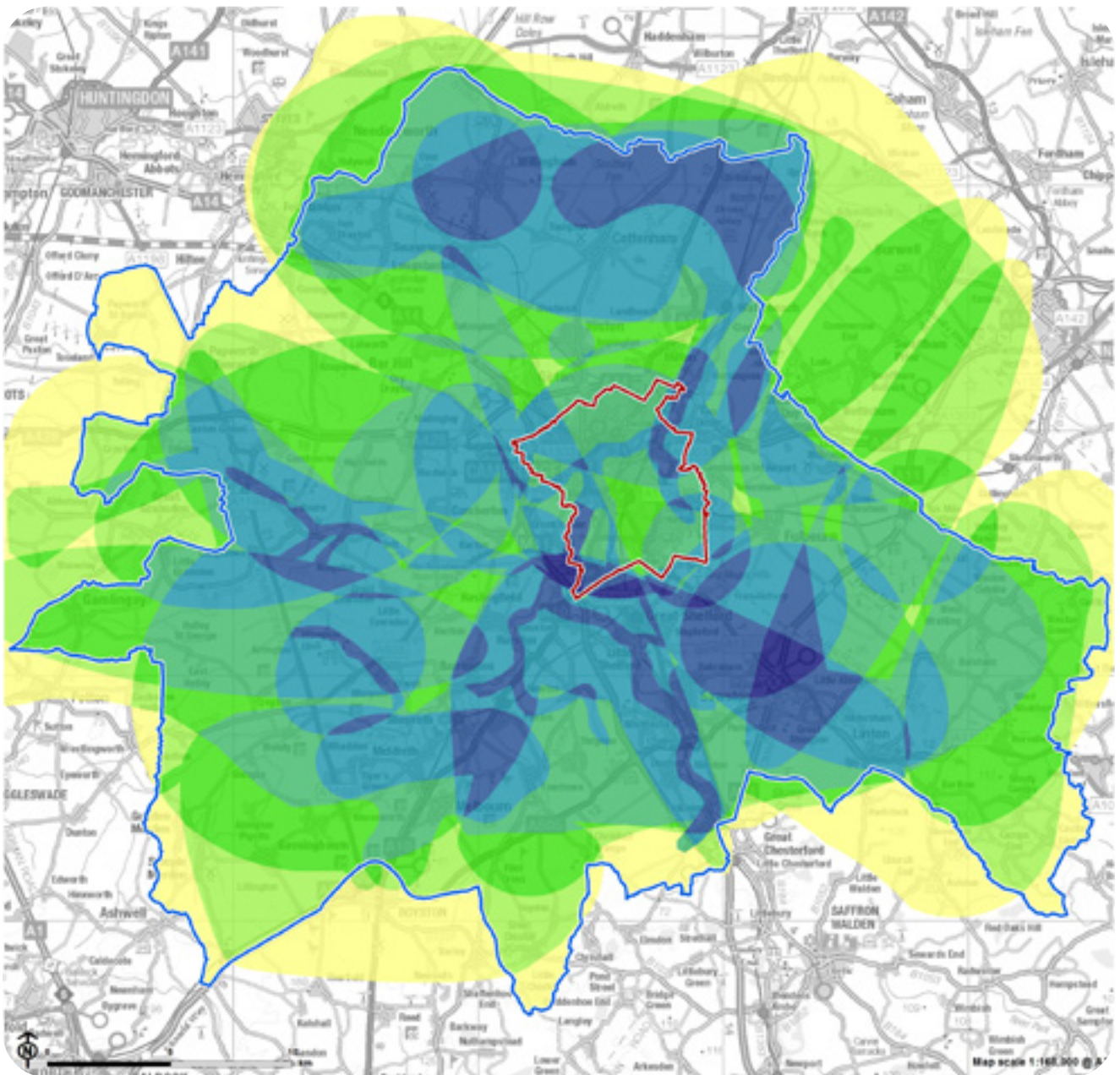
The maps on this page are taken from the **Greater Cambridge Green Infrastructure Opportunity Mapping Baseline Report**.

They provide an indication of the current extent of the green infrastructure network in Greater Cambridge and the extent and range of opportunities for extending and enhancing it. For further details, please see the report which can be found on the Greater Cambridge Shared Planning website.



The green infrastructure network in Greater Cambridge, (fig 5.1 in the report)

- | | | |
|-------------|----------------------|----------------------|
| Cambridge | South Cambridgeshire | Green infrastructure |
| Water space | Agricultural land | Private garden |



Broad opportunity zones for green infrastructure grouped under seven themes (fig 7.1 in the report)

- Cambridge
- South Cambridgeshire
- Landscape, cultural heritage, and sense of place
- Biodiversity and geodiversity
- The water environment
- Access and connectivity
- Recreation and play
- Carbon sequestration
- Agriculture and community food growing

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What you can do

There are lots of ways you can support nature in South Cambridgeshire. Here are a few suggestions.

- Make your garden more wildlife-friendly, see [Wildlife Gardening | Wildlife Trust for Beds, Cambs & Northants \(wildlifebcn.org\)](https://www.wildlifebcn.org) for ideas.
- Get together with others in your neighbourhood to create and deliver a nature recovery plan for your local area, using the [Natural Cambridgeshire Local Nature Recovery Toolkit](#).
- Work with a local community organisation or your parish council to apply for funding through the Zero Carbon Communities grant scheme.
- Support a nature conservation organisation.
- Sign the [Natural Cambridgeshire Pledge for Nature](#).





Further information

You can find further information via the below links.

- [Greater Cambridge Local Plan](#)
- [Zero Carbon Communities grant scheme](#)
- [Trees and Hedgerows on the Council's website](#)
- [Natural England Natural Capital Atlas 4 provides detailed maps showing the distribution and condition of natural assets in Cambridgeshire](#)
- [Mapping Natural Capital and Opportunities for Habitat Creation in Cambridgeshire report for Cambridgeshire Biodiversity Partnership](#)
- [OxCam Local Natural Capital Plan](#)
- [Natural Cambridgeshire](#)
- [Wildlife Trust for Bedfordshire, Cambridgeshire and Northants](#)
- [Cam Valley Forum](#)

Thanks to John Cornell for selected photographs within this document

Appendix CExQ2 1.4 Joint PM & SoS LUHC Long-term plan for housing (July 2023)

[Home](#) > [Housing, local and community](#)

News story

Long-term plan for housing

The Prime Minister and Secretary of State for Levelling Up, Housing and Communities have set out further plans for regeneration, inner-city densification and housing delivery across England.

From: [Department for Levelling Up, Housing and Communities](#) (</government/organisations/department-for-levelling-up-housing-and-communities>), [Prime Minister's Office, 10 Downing Street](#) (</government/organisations/prime-ministers-office-10-downing-street>), and [The Rt Hon Michael Gove MP](#) (</government/people/michael-gove>)

Published 24 July 2023



- Today (24 July 2023), as part of a [long-term plan for housing](#)

<https://www.gov.uk/government/speeches/long-term-plan-for-housing-secretary-of-states-speech>), the Prime Minister and Secretary of State for Levelling Up, Housing and Communities have committed to a new era of regeneration, inner-city densification and housing delivery across England, with transformational plans to supply beautiful, safe, decent homes in places with high-growth potential in partnership with local communities.

- Building on work already underway to meet our commitment in the Levelling Up White Paper to regenerate 20 of our towns and cities, the Levelling Up Secretary has announced the regeneration and renaissance of a further 3 English cities, committing to transformational change in Cambridge, central London and central Leeds.
- This follows work to level up towns and cities across the country – including in Sheffield and Wolverhampton. The Levelling Up Secretary also outlined plans to continue working closely with local partners in Barrow, to help make Barrow a new powerhouse of the North.
- £800 million will also be allocated today from the £1.5 billion Brownfield, Infrastructure and Land fund to unlock up to 56,000 new homes on brownfield sites, taking an infrastructure first approach to build up our cities. We are funding Homes England with £550 million, which with income generated will mean a total investment of £1 billion. We are also providing landmark investments of £150 million to Greater Manchester and £100 million to the West Midlands.
- Additional reforms to the planning system will speed up new developments, put power in the hands of local communities to build their own homes, and unlock planning decisions – with a new fund of £24 million to scale up local planning capacity, and an additional £13.5 million to stand up a new “super-squad” of experts to support large scale development projects.

Regeneration of 20 places

Following the commitment in the Levelling Up White Paper to regenerate 20 places, the Levelling Up Secretary and Prime Minister set out further plans today on Cambridge, and inner-city London and central Leeds.

Proposals will see Cambridge supercharged as Europe's science capital, addressing constraints that have left the city with some of the most expensive property markets outside London, and companies fighting over extremely limited lab space and commercial property with prices that rival London, Paris and Amsterdam.

These ambitious plans to support Cambridge include a vision for a new quarter of well-designed, sustainable and beautiful neighbourhoods for people to live in, work and study. A quarter with space for cutting-edge laboratories, commercial developments fully adapted to climate change and that is green, with life science facilities encircled by country parkland and woodland accessible to all who live in Cambridge.

Any development of this scale will have substantial infrastructure requirements. The government will deliver as much of the infrastructure and affordable housing as possible using land value capture – with the local area benefiting from the significant increase in land values that can occur when agricultural land is permitted for residential and commercial development. Land values will reflect the substantial contributions required to unlock the development (see [annex](#)).

A Cambridge Delivery Group, chaired by Peter Freeman and backed by £5 million, will be established to begin driving forward this project. The Group will work to turn this vision into a reality, taking a lead on identifying the housing, infrastructure, services and green space required. It will also consider options for an appropriate delivery mechanism that will be needed to lead the long-term work on planning, land acquisition and engagement with developers, starting in this Parliament but running through the next few years as development takes shape.

In the meantime, the Delivery Group will take forward immediate action to address barriers such as water scarcity across the city, including:

- Convening a Water Scarcity Working Group with the Environment Agency, Ofwat, central and local government and innovators across industries to identify and accelerate plans to address water constraints. The Group will include all relevant partners to understand what it would take to accelerate building the proposed new Fens Reservoir and enabling Cambridge to reach its economic potential.
- Supporting the council in efforts to make sure new developments proposed as part of the local plan can be as sustainable as possible, including whether new houses in planned developments such as Waterbeach and Hartree can be made more water efficient. To support this, the government is announcing today a £3 million funding pot to help support measures to improve the water efficiency of existing homes and commercial property across Cambridge, to help offset demands created by new developments in the local plan.
- The government will also take definitive action to unblock development where it has stalled, providing £500,000 of funding to assist with planning capacity. Cambridge City Council, Anglian Water, Land Securities PLC and Homes England will work together to accelerate the relocation of water treatment works in Northeast Cambridge (subject to planning permission), unlocking an entire new City quarter – delivering approaching 6,000 sustainable well-designed homes in thriving neighbourhoods – as well as schools, parks and over 1 million square feet of much needed commercial life science research space.

In addition to Cambridge, today the government has also announced:

- A 'Docklands 2.0' vision in East London for up to 65,000 homes across multiple sites of significant scale including at Thamesmead, Beckton and Silvertown. Beautiful, well-connected homes and new landscaped parkland will be integral to the

vision. We will look at how we can ensure better transport connections from east to west, to 'crowd in' local and private investment, and to build the best evidence on how and whether HMG will invest in the future.

- London will also see the benefits of this government's decision to allow the Affordable Homes Programme to be directed towards regeneration for the first time – with up to £1 billion available in London alone – as part of a transformative reform that will change how we level up communities across the country. We have also made £1 million available to push forward work with the Mayor to consider how we drive housing delivery in London, including looking at innovative new ways that industrial land can be released for housing.
- A commitment to work with local partners in central Leeds, to regenerate the city centre and explore how a West Yorkshire mass transit system could open up the city to many more workers across the city's burgeoning financial, digital and legal sectors. This builds on the £40 million that is already being provided by the government to West Yorkshire Combined Authority to support development of the mass transit system and offer a greener, quicker and more reliable option of travel. The government will accelerate work in the centre of Leeds by identifying the remaining barriers to delivery for key housing growth sites within the city rim, including the South Bank, Innovation Arc, and local and neighbourhood plans, potentially delivering up to 20,000 new homes on these sites over the next decade. The government will also work with local authorities to adapt existing HS2 land safeguarded in Leeds City Centre where appropriate, supporting economic growth and housing delivery. Additional revenue funding will be provided to support capacity and development to deliver these ambitions.
- Plans to continue working closely with local partners in Barrow-in-Furness, to help make it a new powerhouse of the North – extending beyond its current boundaries with thousands of new homes and space for new businesses to benefit from the scientific and technical expertise already clustered there.

- We are also investing £800 million from the £1.5 billion Brownfield, Infrastructure and Land fund to unlock up to 56,000 new homes across England, to transform disused sites and create vibrant communities for people to live and work, while also protecting our cherished green spaces, including further accelerating activity in areas such as Sheffield. We are funding Homes England with £550 million which, in real terms, will be an investment of up to £1 billion through the reinvestment of receipts back into the fund. As set out previously, we are also providing £250 million to Greater Manchester and West Midlands Combined Authorities.

Building up and building out across the country

In addition to targeted action in a few high-potential areas, the government's plan delivers a package of reforms to unleash building on underused sites in high-demand regions. Densification, done the right way, will transform the opportunities available to people across the country – our inner cities have much lower population densities than comparable Western countries, impacting our productivity. The plan therefore includes:

- Launching a consultation on new Permitted Development Rights, to provide more certainty over some types of development, and how design codes might apply to certain rights to protect local character and give developers greater confidence. New and amended permitted development rights would make it easier to convert larger department stores, space above shops and office space. The plan also backs rural communities, with changes to support farm diversification and development, to allow businesses to extend and more outdoor markets to be held. The government will consult in the Autumn on how to better support existing homeowners to extend their homes. The government will continue to ensure that local removal of permitted development rights through Article 4 Directions will only be agreed where

there is evidence of wholly unacceptable impacts.

- Taking steps to unblock the bottlenecks in the planning system that are choking and slowing down development, and stopping growth and investment by:
 - Launching a new £24 million Planning Skills Delivery Fund to clear planning backlogs and get the right skills in place.
 - Establishing a new “super-squad” team of leading planners and other experts charged with working across the planning system to unblock major housing developments, underpinned by £13.5 million in funding. The team will first be deployed in Cambridge to boost our plans in the city, before also looking at sites across our eight Investment Zones in England, to provide high-quality homes to go alongside the high-quality jobs being created there.
 - Increasing the amount developers pay in planning fees, following our recent consultation, to ensure all planning departments are better resourced.

The government’s commitment to development and regeneration in and around existing town and city centres is also guiding its consideration of responses to the consultation on updating the National Planning Policy Framework. The government wants to make it easier to progress such developments, and to that end is clear that:

- Development should proceed on sites that are adopted in a local plan with full input from the local community, unless there are strong reasons why it cannot.
- Local councils should be open and pragmatic in agreeing changes to developments where conditions mean that the original plan may no longer be viable, rather than losing the development wholesale or seeing development mothballed.
- Better use should be made of small pockets of brownfield land by being more permissive, so more homes can be built more quickly, where

and how it makes sense, giving more confidence and certainty to SME builders.

Later in the year, the government will pass the Levelling Up and Regeneration Bill to put in place our reforms to the planning system that will create more beautiful and sustainable homes in the right places, and publish updates to the National Planning Policy Framework.

Communities taking back control / building beautiful everywhere

To deliver housing anywhere, all new homes built will need to be accepted by the community – they will need to be beautiful, well-connected, designed with local people in mind and be accompanied by the right community infrastructure and green space. Communities must have a say in how and where homes are built.

In this plan, communities will be supported to be at the heart of new development in their areas. This will be achieved by:

- Establishing the Office for Place in Stoke-on-Trent, a new body to lead a design revolution, ensuring beautiful new homes are built according to a simple design code supported by local people. The Office for Place will support residents to demand what they find beautiful from developers – ensuring every local place is built to reflect the individual local character and beauty of every community across the country. Nicholas Boys Smith has been appointed as the interim chair.
- Supporting councils to deliver high quality up to date local plans, launching a consultation to seek views on our proposals to simplify the system of developing a new plan. Local plans are the best way to ensure the right homes are built in the right places, so the government will work with councils to reduce the cost and bureaucracy associated with getting an updated plan in place. The government is also clear that local authorities should continue to develop their local plans, ensuring local people get their say.

Building safely

In all buildings, the first priority must be keeping people safe. Through the landmark Building Safety Act 2022, the government has overhauled the way we do so with a “golden thread” of accountability and protections for leaseholders from the ruinous costs of fixing the mistakes of others.

The government will not be complacent in its approach to safety – recognising that, as work progresses to densify our towns and cities, people must be given unimpeachable confidence that new homes are safe and decent to live in. This long-term plan for housing therefore builds on our existing progress by:

- Confirming the intention to mandate second staircases in new residential buildings above 18m, following confirmation from expert bodies that they support this threshold. This responds to the call from the sector for coherence and certainty. This is a considered and gradual evolution of safety standards, which, when taken with our other fire safety measures and reforms ensures the safety of people in all tall buildings – both new and existing. The government is clear that this new regulation cannot jeopardise the supply of homes by disrupting schemes that have been planned for years. DLUHC will work rapidly with industry and regulators over the summer to design transitional arrangements with the aim of securing the viability of projects which are already underway, avoiding delays where there are other more appropriate mitigations.
- Opening the Cladding Safety Scheme to all eligible buildings, ensuring that no leaseholder will be out of pocket to fix dangerous cladding in medium or high-rise buildings.

Annex

The development of a new quarter in Cambridge will have substantial infrastructure requirements, including water, power, transport, affordable housing, environmental and social infrastructure. Permitting such a development will also result in

substantial increases in land values above the existing use value of the land.

Government viability guidance sets out that when undertaking a viability appraisal, the value allowed for the purchase of land should in general be based on the value of the land in its existing use, plus an appropriate premium for the landowner. The government intends to explore recommendations about what a reasonable premium to agricultural landowners should be.

Building on this approach, the government intends that a consultation will be undertaken to inform the policy on a reasonable premium for landowners above existing use value, to support the development of plans for the new quarter. To the extent that infrastructure and affordable housing need justifies this position, the government anticipates that policy will be set to capture land value uplift above the premium. This will enable landowners to receive fair compensation for their land while minimising the public sector investment required to bring the development forward.

Published 24 July 2023

Explore the topic

[Housing, local and community \(/housing-local-and-community\)](#)

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Appendix D ExQ2 1.4 SoS LUHC Statement (December 2023)

Written questions, answers and statements

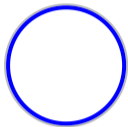
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The Next Stage in Our Long Term Plan for Housing Update

Statement made on 19 December 2023

Statement UIN HCWS161

Statement made by



Michael Gove

Secretary of State for Levelling Up, Housing and Communities and Minister for Intergovernmental Relations

Conservative

Surrey Heath

Commons

>

Statement

This Government is committed to building more homes; more quickly, more beautifully and more sustainably. The best way to deliver is through a reformed planning system. Today we lay out our plan for reform. It is only through up-to-date local plans that local authorities can deliver for communities, protect the land and assets that matter most, and create the conditions for more homes to be delivered. Having plans in place unlocks land for homes, hospitals and GP centres, schools, power grid connections and more – laying foundations for the country’s economic growth and the levelling up of communities for decades to come.

Too many local authorities have no up-to date plan, too many take too long to get their plan in place and too many plans do not deliver as they should. Even when plans are in place, too many local authorities take too long to determine applications, too many reject proposals which are in line with their policies, and officers’ recommendations, and too many fail to ensure a proper pipeline of housing delivery.

Where plans are not in place, or not working effectively, communities are unprotected from speculative development. Houses still get built. But too often in inappropriate locations. Too slowly. And without the right infrastructure or community assets in place.

That serves no-one well. Communities do not have control. Developers do not have certainty. Homes for the next generation do not get built at the rate, or in the locations, we need.

This Government has a coherent, holistic, long-term reform programme to ensure the planning system at last delivers as it should.

Today’s update to the National Planning Policy Framework (NPPF) addresses the concerns expressed by local elected representatives about weaknesses in the planning system which led to frustrations about the nature of development. It provides clearer protection for the Green Belt, clarity on how future housing supply should be assessed in plans, certainty on the responsibility of urban authorities to play their full part in meeting housing need and protections for the character of precious neighbourhoods, safeguarding the gentle density of suburbs and ensuring family homes are there for the next generation.

These changes meet the clearly expressed, and wholly understandable, wishes of elected politicians of all parties to deliver for their communities. Taken alongside other changes in the Levelling Up and Regeneration Act, they entrench the importance of beauty in new development, facilitate the delivery of improved infrastructure, respect the democratic voice of local communities, secure enhancements to our natural environment and deliver quality new neighbourhoods.

With these changes secure, there is now an added responsibility on local government to deliver. The reasons sometimes cited for resisting new development and expediting its delivery have been clearly addressed. So I am setting new expectations for faster delivery, strengthening accountability so poor performers can be better identified, taking further steps to enforce effective delivery of new housing where local authorities have failed most egregiously and putting other, failing, local authorities on notice of my intention to intervene if performance does not improve significantly.

With this higher level of expectation comes additional resource. We need excellent planners, well funded and well supported, to deliver the many more beautiful new homes we need. Planning is a noble profession and its role in making our communities work for every citizen is vital. That work has not always been recognised and respected as it should. So I will provide funds to support and reward planners in local government and dedicate the very best in central government to work with them to deliver.

Our approach to planning is of a piece with the broader approach my department has taken to local government. We have listened sensitively to elected representatives, we have given them more of the powers and freedom they have requested. But with that greater freedom comes greater accountability. Where failure occurs, we intervene more quickly and decisively. Where failure risks compromising the national interest, we intervene more comprehensively. We will provide additional resource to support vital professional leaders on the front line. We will champion their good practice, not least through our new watchdog Oflog, but we will also demand that all aspire to reach the standard of the best.

With both the Levelling Up and Regeneration Act and the new NPPF now in place, alongside the additional resources for planning departments I am announcing today, our planning reforms will accelerate the delivery of new homes. We are on track to deliver one million homes this Parliament, in line with our manifesto commitment. Our reforms will also strengthen our ability to meet our target of 300,000 additional homes a year. The next generation need those homes built. Future generations need to know the developments we build for them will be beautiful and will endure. And they want the natural environment enhanced to match a better built environment. That is what we will deliver.

National Planning Policy Framework

The NPPF is the backbone of the planning system – it sets the Framework within which local authorities, the planning inspectorate and applicants to the system must operate. Plans must take the Framework into account, and it is a material consideration for decisions. This makes it fundamental to the delivery of new housing in the right places, while also protecting and enhancing the things we care most about: our environment, heritage assets, our high streets and beyond.

In December 2022, I launched a consultation on changes to the NPPF. We received 26,000 responses and have considered them carefully. In summary, the new NPPF will: facilitate flexibility for local authorities in relation to local housing need; clarify a local lock on any changes to Green Belt boundaries; safeguard local plans from densities that would be wholly out of character; free local authorities with up-to-date local plans from annual updates to their five-year housing land supply; limit the practice of housing need being exported to neighbouring authorities without mutual agreement; bolster protections from speculative development for neighbourhoods that develop their own plans; support self-build, custom-build and community-led housing; and cement the role of beauty and placemaking in the planning system.

There is now no excuse for local authorities not rapidly adopting ambitious plans. The more plans adopted quickly, the more homes delivered quickly - and we have created the right incentives for rapid plan adoption.

The updated NPPF published today contains and should be referred to for the policy changes described in this statement. The full suite of changes are detailed in the Government's consultation response, but the principal changes are set out here.

The Purpose of Planning

The opening chapters of the NPPF have been updated to provide clarity on a core purpose of the planning system: planning for homes and other development that our communities need. It is also clear that having up-to-date plans in place is a priority in meeting this objective. All the following changes in the Framework reflect this fundamental purpose and priority.

Local Housing Need

The standard method for assessing Local Housing Need ensures that plan-making is informed by an unconstrained assessment of the number of homes needed, in a way which addresses projected household growth and affordability pressures; alongside an efficient process for establishing housing requirement figures in local plans.

These figures have, however, sometimes been difficult to achieve in some areas and blind to the exceptional characteristics of a local community. That is why the new NPPF makes clear that the outcome of the standard method is an advisory starting point in plan making for establishing the housing requirements for an area. Some local authorities may wish to deliver more homes. Where a local authority considers the number unachievable, it must provide robust evidence for that judgement. The revised NPPF provides clarity on what may constitute such exceptional circumstances for using an alternative method to assess housing need, including the particular demographic characteristics of an area, which could include those that may result from the unique nature of islands. Any assessment will be subject to examination as usual.

The Government also considered allowing authorities to take account of past 'over-delivery' when preparing new plans. Having considered responses to the consultation, which raised questions over needing to also consider 'under-delivery' and the risk of double counting homes via the standard method, we are not proceeding with this change at this time.

Green Belt

This Government is committed to protecting the Green Belt. Planning policy already includes strong protections to safeguard Green Belt for future generations. The Green Belt is vital for preventing urban sprawl and encroachment on valued countryside. England's cities are already less dense than those of most of our European neighbours. That is environmentally wasteful and economically inefficient. We seek to support the gentle densification of urban areas in preference to the erosion of Green Belt land. That is why the Government is ensuring it is clear there is generally no requirement on local authorities to review or alter Green Belt boundaries if this would be the only way to meet housing need. Where a relevant local planning authority chooses to conduct a review, existing national policy will continue to expect that Green Belt boundaries are only altered where exceptional circumstances are fully evidenced and justified, and this should only be through the preparation or updating of plans.

The Government is making no changes to the rules that govern what can and cannot be built on land that is Green Belt, but we are clarifying in guidance where brownfield development in the Green Belt can occur provided the openness of Green Belt is not harmed. I understand that the Opposition has advocated this as if it would be a new approach, suggesting a misunderstanding of existing policy, which the Government is therefore happy to make even clearer in practice guidance.

Character

This Government believes in heritage, beauty and community. It is important that the character of an existing area is respected by new development, particularly in the historic suburbs of our great towns and cities. The new NPPF therefore recognises that there may be situations where significant uplifts in residential densities would be inappropriate as they would be wholly out of character with the existing area, and that this may in turn affect how much development can be planned for in the area concerned. This will apply where there is a design code which is adopted or will be adopted as part of the local plan.

Exporting Housing Need

The standard method was amended in 2020 to include an uplift in need for the 20 most populated English cities and urban centres. This urban uplift supports the Government's objectives, as outlined above, to make the best use of previously developed land and locate more homes in our larger towns and cities, where development can help to reduce the need to travel and contribute to productivity, regeneration and levelling up. The updated NPPF now makes clear that this uplift should, be accommodated within those cities and urban centres concerned rather than exported to surrounding areas – except where there is a voluntary cross-boundary agreement to do so, or where this would conflict with other policies in the NPPF. This complements the repeal of the duty to cooperate through the Levelling Up and Regeneration Act which will shortly come into effect.

Five-year Housing Land Supply

Up-to-date local plans ensure local communities are in control of where and what development happens in their area. They are key to getting more homes built in the right places. Where such plans are in place, the Government is committed to protecting local authorities from unwarranted speculative development.

The Government considers an up-to-date plan to be a plan that is less than five years old, and which contained a deliverable five-year supply of land at conclusion of its examination. All planning authorities are required to maintain a five-year supply of land to ensure homes and wider developments are built in the right places. However, authorities have previously been required to update this supply annually in a process that was burdensome and provided too many opportunities for speculative development.

We are now changing this and removing the requirement for planning authorities that have done the right thing and put an up-to-date plan in place to update annually their five-year supply of land. This change provides these authorities with additional protection from the presumption in favour of sustainable development. I am also fully removing the 5% and 10% buffers that could be applied to an authority's housing land supply. A transitional arrangement will ensure that decision making on live applications is not affected, avoiding disruption to applications in the system.

We are also rewarding local authorities at an advanced stage of plan making. Some local authorities have paused plan making in recent months. That is not good policy, lets communities down and we have warned of the consequences. Local plans at examination, Regulation 18, or Regulation 19 stage with a policy map and proposed allocations towards meeting housing need only have to demonstrate a four-year housing land supply (as opposed to five years) for a period of two years for decision making purposes. That protection is not afforded those who have dragged their feet.

And tough measures will bite where local authorities do not have an up-to-date local plan. They will be required to update their supply annually, and if they fail to do so, they will therefore be subject to the presumption in favour of sustainable development. Local authorities will have a clearer than ever incentive to get plans in place. Without them, authorities will not be able to control development as their community might wish. There are clear consequences to failing to get a plan in place which delivers a pipeline of new housing.

Another way in which consequences are applied in the planning system is through the Housing Delivery Test. This Test is an assessment of an authority's previous three years of housing delivery, and where there has been under-delivery, consequences follow. Today I am making some changes to these consequences. The 20% buffer an authority needs to add to its housing land supply where housing delivery falls below 85% of its requirement will now only apply to those authorities that do not have an up-to-date plan in place.

All authorities will however continue to be subject to the other consequences: producing an Action Plan identifying the reasons for under-delivery and the measures the authority will take to correct it where delivery falls below 95%; and becoming subject to the presumption in favour of sustainable development where delivery falls below 75%.

In summary, we want to make life easier for those authorities who are doing the right thing, getting their plans in place and delivering housing. But also ensure that authorities that continue to fail their communities on housing delivery are held to account.

When it comes to calculating a five-year housing land supply, the Government is clear that we want to bring the position on past oversupply in line with that of past undersupply. We have amended the NPPF to formalise existing planning practice guidance on this topic and will in due course update this guidance to bring the over-supply position in line with under-supply. We will also give further consideration to the proposal to take permissions granted by a local authority into account in the application of the Housing Delivery Test, in particular the operational challenges with doing so identified in the consultation.

Neighbourhood Plans

The poor performance of local planning authorities will lead to consequences. But local communities that have worked hard to put neighbourhood plans in place should not be penalised for the failure of their council to ensure an up-to-date local plan. The new NPPF therefore protects neighbourhood plans from speculative development from two to five years, where those plans allocate at least one housing site.

Community-Led Housing and Self and Custom Build

The best councils know that driving faster housing delivery requires supporting diversity in the number and type of builders. Councils which support small and medium sized enterprises in the housing market, and which enable custom and self-build homes, drive the necessary increase we need in supply and better ensure the right homes are provided in the right places. The updated NPPF now emphasises the importance of community-led housing development, including by introducing an exception site policy for community-led housing development. Our policy changes also ensure that local authorities should seek opportunities to support small sites to come forward for community-led housing, and self-build and custom build housing. They also encourage 'permission in principle' alongside other routes to permission (such as local development orders) to remove barriers for smaller and medium site builders in the planning system.

The Government will also encourage the delivery of older people's housing, including retirement housing, housing-with-care and care homes by requiring these to be specifically considered in establishing need.

The Role of Beauty

Building beautifully and refusing ugliness has been central to the Government's planning reforms, as the right aesthetic form makes development more likely to be welcomed by the community. From today, the NPPF goes further to cement the role of beauty and placemaking in the planning system by expressly using the word 'beautiful' in relation to 'well-designed places'. It also now requires greater 'visual clarity' on design requirements set out in planning conditions to provide certainty for those implementing planning permissions and supports gentle density through mansard roof development where appropriate.

Environment and energy

The new NPPF also strengthens protections for agricultural land, by being clear that consideration should be given to the availability of agricultural land for food production in development decisions; and supports the Government's Energy Security Strategy by giving significant weight to the importance of energy efficiency in the adaptation of existing buildings, while protecting heritage. These amendments will not impose any costs on home or building owners.

Wider reforms beyond the NPPF

In addition to those policies we have now updated in the NPPF, in December 2022 I also set out ambitions for other housing policies in relation to short-term lets regulations and the character of developers, noting the importance of these issues to communities.

On the character of developers, I also set out concerns about examples of how the planning system is undermined by irresponsible developers and landowners who persistently ignore planning rules and fail to deliver legal commitments to the community. I consulted to explore whether an applicant's past behaviour should be taken into account in decision making either through making irresponsible behaviour a material consideration or allowing local planning authorities to decline applications from applicants with a bad track record. Both options would require primary legislation and therefore are beyond the scope of this NPPF update. I welcome views expressed in the consultation and will consider these carefully in further policy development. To address the concerns and frustrations expressed by communities about breaches of planning control more immediately, I am now implementing the planning enforcement package in the Levelling Up and Regeneration Act. This includes extending the time limits to take enforcement action, increasing maximum fines and reducing loopholes to appeal against enforcement action.

Finally, I am committed to tackling slow build out rates, recognising that it remains a major concern. I will do so through a consultation on measures to improve build out rates once the Competition and Markets Authority has published its final report as part of their housebuilding market study in 2024.

Planning Performance

With the updated NPPF now reforming the planning system to take account of the concerns and hopes expressed by locally elected representatives of all parties, it is now up to those who make it work – local authorities, the Planning Inspectorate and statutory consultees – to expedite delivery.

My expectations are simple: planning decisions must be taken on time, should be robust in their reasoning, and all authorities must have an up-to-date local plan. After a period of review and reform, local authorities now have certainty, and with that certainty I now expect a higher level of performance.

As I said in a letter to all local authorities in September, that means: development should proceed on sites that are allocated in an adopted local plan with full input from the local community unless there are strong reasons why it cannot; councils should be open and pragmatic in agreeing changes to developments where conditions mean that the original plan may no longer be viable, rather than losing the development wholesale or seeing development mothballed; and better use should be made of small pockets of brownfield land by being more permissive, so more homes can be built more quickly, where and how it makes sense, giving more confidence and certainty to SME builders.

Today I am going further still, taking steps to improve planning performance on four fronts.

Greater Transparency

Being transparent about data improves understanding of relative good and poor performance, and sparks action. That is why we will publish a new local authority performance dashboard in 2024.

As part of that reporting, we will expose the way in which some local authorities drag their feet. We will strip out the use of Extension of Time agreements, which currently mask poor performance. While I recognise that there will be instances where such agreements are necessary, I am concerned by the increase in their use – in particular for non-major applications, where the figure has jumped

from 9% during the two years to March 2016 to 38% during the two years to March 2022. I therefore intend to consult on constraining their use, including banning them for householder applications, limiting when in the process they can apply, and prohibiting repeat agreements.

Additional Financial Support

In recognition that we are expecting better performance from local authorities, we are providing additional resource to help meet those expectations through a range of new funding streams.

First, as of 6 December, planning fees have increased by 35% for major applications and 25% for other applications. Local authorities are obliged to spend these fees on planning services, and I am clear there should be no decrease in authorities' spend on planning from their general fund.

Second, following the Chancellor's boost to the Planning Skills Delivery Fund at the Autumn Statement to a total £29 million, 180 local authorities have today been awarded a share of £14.3 million from the first round of funding. This will better enable them to clear their planning application backlogs and invest in the skills needed to deliver the changes set out in the Levelling Up and Regeneration Act.

Third, we are establishing our Planning Super Squad members – the new team of leading planners and specialists whose talents will be used to unblock major developments, with £13.5 million to fund their work.

Fourth, the Autumn Statement allocated £5 million to support Local Development Orders. These are a powerful way for local authorities to grant planning permission upfront where development meets pre-determined rules, but have been underused. The Government recognises both the different nature of the process for developing a Local Development Order and the loss of fee income could disincentivise take up, and will therefore use this £5 million to support a small number of authorities with exciting proposals to get such Orders in place – and if successful, look to expand this kind of support more widely.

Fifth, and demonstrating that we will act to support development where the Opposition seems determined to block it, we are today allocating up-to £57 million to the eight successful bids in the first round of the Local Nutrient Mitigation Fund. At the same time, we are confirming that the second round will open for bids in January 2024, and providing a further round of Nutrient Support Funding in the form of £100,000 to the lead local authority for large, affected catchments. The Environment Secretary and I are determined to do more in the new year to unblock these stalled homes, while enhancing public access to nature and leaving our environment in a better state than we found it.

Faster Processes

Today we also address wider causes of delay in the planning system, with action on statutory consultees, customised arrangements for major applications, and support to prioritise the work of planning committees.

On statutory consultees, while the statistics suggest that most do respond within the 21-day limit, the use of holding responses is disguising a process that is too slow. The Levelling Up and Regeneration Act makes sure statutory consultees can charge for pre-application advice, which should tackle problems upstream for developers and reduces downstream requests from local authorities.

I am however convinced there is more we can do. I am asking Sam Richards to lead a rapid, three-month review into the wider statutory consultee system to understand how best to direct their advice and resources to support speedy and effective decision making. I also expect to see greater discretion and judgement applied by both local authorities and statutory consultees on where advice is sought and where it needs to be offered.

On accelerated planning services, which were confirmed in the Autumn Statement, these will build on the existing model of Planning Performance Agreements, which are struck between local authorities and developers, detailing how an application will be handled and what timescales will apply. While we know these agreements work well in some areas, it is also clear that they are used inconsistently – with many developers finding that the payments charged and the level of service offered vary significantly between authorities.

We will now look to regularise these arrangements – making sure that they are offered across England, that clear milestones have to be agreed, that fees are set at an appropriate level, and that those fees have to be refunded where milestones are missed. Given the complexity and necessary flexibility that comes with such applications, we will work closely with the sector as we design these arrangements before consulting in the new year.

On planning committees, we rightly see elected representatives judge the merits of significant applications – and it is vital that they focus their time on applications that truly merit such scrutiny, and arrive at decisions following legitimate reasoning. On this basis, I have asked the Planning Inspectorate to start reporting to the department about cases where a successful appeal is made against a planning committee decision, and the final decision is the same as the original officer’s recommendation. The overturning of a recommendation made by a professional and specialist officer should be rare and infrequent – such that I have reminded the inspectorate that where it cannot find reasonable grounds for the committee having overturned the officer’s recommendation, it should consider awarding costs to the appellant.

I intend to consider what more we can do to support planning officers and the committees they serve to focus on the right applications. This might be about providing more training, or using guidance to share best practice on the tools that can help to prioritise a committee’s time – including the schemes of delegation that authorities adopt to determine which applications get determined by officers and which warrant committee airing.

Direct Action

Where these expectations for the planning system are not met, I will intervene.

I support transferring power to local areas so decisions are taken as close as possible to the areas and people most affected by them. With sharper power, authority and flexibility, however, comes sharper accountability. Where there is failure, and communities are in danger of being let down, the Secretary of State must act.

In this spirit, I am issuing a direction to seven of the worst authorities in terms of plan-making, requiring them to publish a plan timetable within 12 weeks of the publication of the new NPPF – and should they fail, I will consider further intervention to ensure a plan is put in place. This does not mean I am not prepared to act elsewhere, and I expect all other authorities to make sure that they have an up-to-date plan timetable in place within the same timeframe, with a copy provided to my department.

I have also designated two additional authorities for their poor-decision making performance and intend to review the thresholds for designation to make sure we are not letting off the hook authorities that should be doing better. The 2022 Housing Delivery Test results will be published today too, with 20 new authorities becoming liable to the presumption in favour of sustainable development.

Finally, as the results of the Housing Delivery Test show us, action is required in London, where the homes we need are simply not being built and opportunities for urban brownfield regeneration go begging. The average of 38,000 net additional dwellings over the past three years has considerably undershot the Mayor’s own target in the London Plan.

I made clear previously that I want to work with the Mayor, and I still do. But it has become evident that changes to the Plan itself may be needed if our capital is to get the homes its people need to flourish and thrive. Therefore, I am today asking Christopher Katkowski KC, Cllr James Jamieson, Paul Monaghan and Dr Wei Yang to review the London Plan, and identify where changes to policy could speed up the delivery of much needed homes in urban city sites in the heart of the Capital.

Reflecting the sincere spirit of partnership that I emphasised in the summer and repeat now, their recommendations will come to me early in the New Year and I will share their report with the Mayor of London. But recognising my responsibilities to the citizens of London, and London’s role in driving growth that benefits the whole country, I stand by what I said in July – that if directing changes becomes necessary, I will do so.

Cambridge

Finally, I want to provide an update on the Government’s vision for Cambridge 2040. In July, I outlined plans for a new urban quarter – one adjacent to the existing city – with beautiful Neo-classical buildings, rich parkland, concert halls and museums providing homes for thousands. This would be accompanied by further, ambitious, development around and in the city to liberate its potential with tens of thousands of new homes.

In the intervening months, Peter Freeman, the Chair of the Cambridge Delivery Group, has been developing our vision for the city, in collaboration with a whole host of local leaders and representatives. I am clear that delivering our vision means laying the groundwork for the long-term, and that starts now.

We plan to establish a new development corporation for Cambridge, which we will arm with the right leadership and full range of powers necessary to marshal this huge project over the next two decades, regardless of the shifting sands of Westminster.

We recognise the scale of development we are talking about will require support from across the public and private sectors, to realise our level of ambition.

And we must also ensure we have an approach towards water that reflects the nature of Cambridge's geography. So today I am also announcing that we will review building regulations in Spring next year to allow local planning authorities to introduce tighter water efficiency standards in new homes. In the meantime, in areas of serious water stress, where water scarcity is inhibiting the adoption of Local Plans or the granting of planning permission for homes, I encourage local planning authorities to work with the Environment Agency and delivery partners to agree standards tighter than the 110 litres per day that is set out in current guidance.

A copy of the updated National Planning Policy Framework and associated documents have been placed in the libraries of both houses. Following the judgment in the Court of Appeal in the case of Smith v SSLUHC & Ors, the Government is reverting the definition of Gypsies and Travellers used in the Planning Policy for Travellers Sites to that adopted in 2012, with this change applying from today for plan and decision making. The Government intends to review this area of policy and case law in 2024. The revised definition has been published on gov.uk.

Statement from

Department for Levelling Up, Housing and Communities



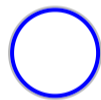
Linked statements

This statement has also been made in the House of Lords

Department for Levelling Up, Housing and Communities



The Next Stage in Our Long Term Plan for Housing Update



[Baroness Penn](#)

Parliamentary Under Secretary of State for Housing and Communities
Conservative, Life peer

Statement made 19 December 2023

HLWS158

Lords

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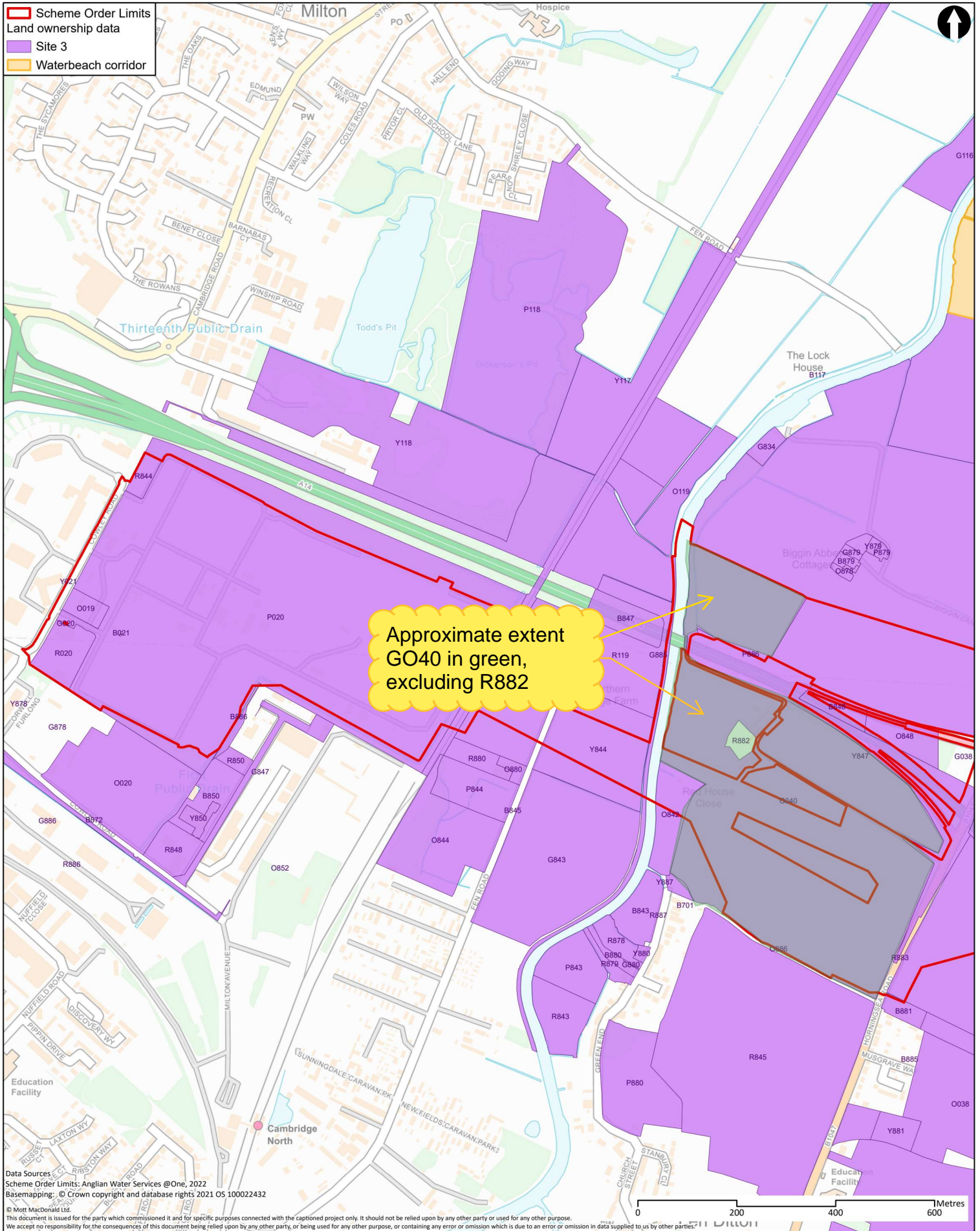
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Appendix E ExQ2 3.3 Extract of Figure 6.11 – Land Ownership



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M M
MOTT MACDONALD

22 Station Road
 Cambridge CB1 2JD
 United Kingdom

T +44 (0)20 8774 2000
 F +44 (0)20 8681 5706
 W mottmac.com

Client					
Rev	Date	Drawn	Description	Ch'k'd	App'd
P1	28/10/22	JB	First Draft	EM	CS

Title

Cambridge Waste Water Treatment Plant Relocation Project
Agricultural Impact Assessment
Land ownership

Drawing Number

Figure 6.11

Drawn	JB
Checked	EM
Approved	CS
Scale at A3	
1:7,000	
Security	Status
STD	PRE
Rev	P1

Appendix F ExQ2 16.2HSE Letter

CEMHD Policy - Land Use Planning,
NSIP Consultations,
Building 1.2,
Redgrave Court,
Merton Road,
Bootle, Merseyside
L20 7HS.

HSE email: NSIP.applications@hse.gov.uk

FAO
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN
By email only

Dear _____

26 October 2021

**PROPOSED CAMBRIDGE WASTE WATER TREATMENT PLANT RELOCATION (the project)
PROPOSAL BY ANGLIAN WATER SERVICES LIMITED (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as
amended) REGULATIONS 10 and 11**

Thank you for your letter of the 20 October 2021 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records the proposed DCO application boundary for this Nationally Significant Infrastructure Project is not within the consultation zones of any major accident hazard sites or major accident hazard pipelines.

This is based on the current configuration as illustrated in, for example, figure 0.0 'EIA Scoping boundary and Zones' of the document Cambridge Waste Water Treatment Plant Relocation Project EIA Scoping report October 2021

HSE's Land Use Planning advice would be dependent on the location of areas where people may be present. When we are consulted by the Applicant with further information under Section 42 of the Planning Act 2008, we can provide full advice.

Hazardous Substance Consent

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015 as amended.

HSC would be required to store or use any of the Named Hazardous Substances or Categories of Substances at or above the controlled quantities set out in Schedule 1 of these Regulations.

Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Consideration of risk assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 Annex on the Planning Inspectorate's website - [Annex G – The Health and Safety Executive](#) . This document includes consideration of risk assessments on page 3.

Explosives sites

HSE has no comment to make as there are no licensed explosives sites in the vicinity.

Electrical Safety

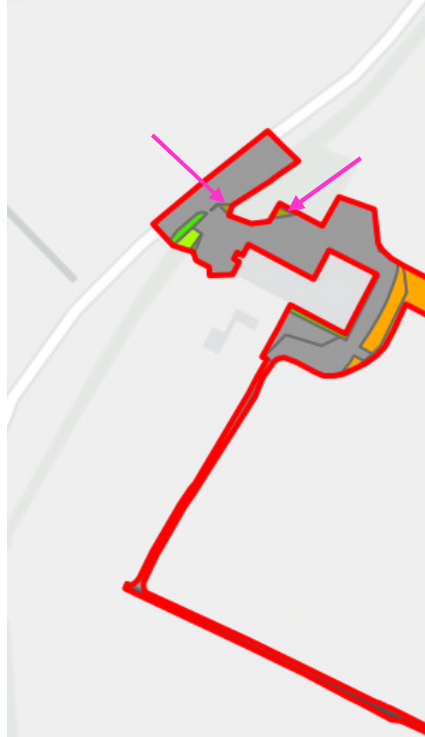
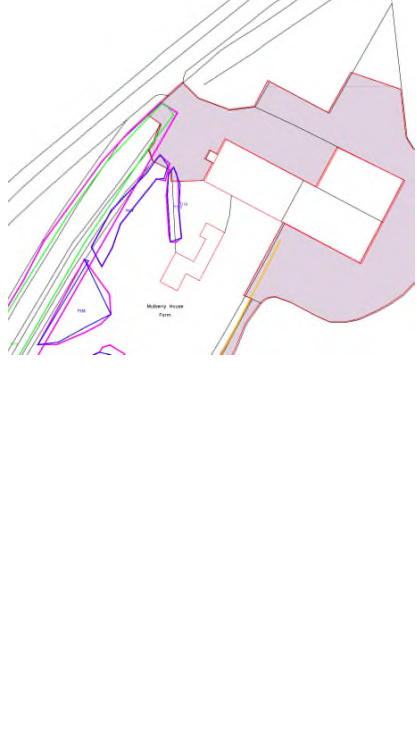
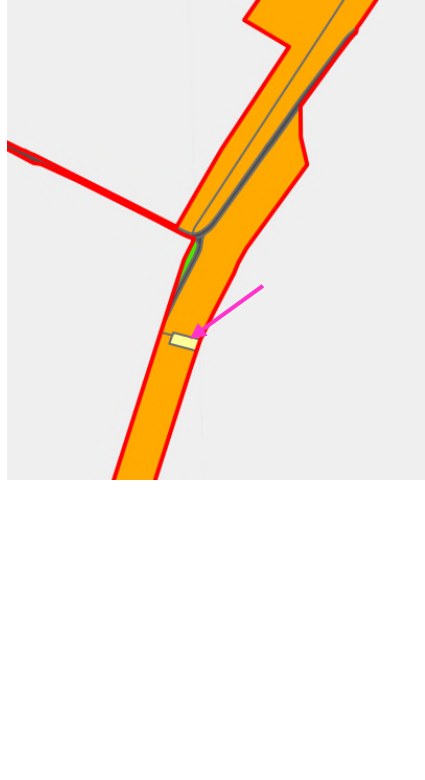
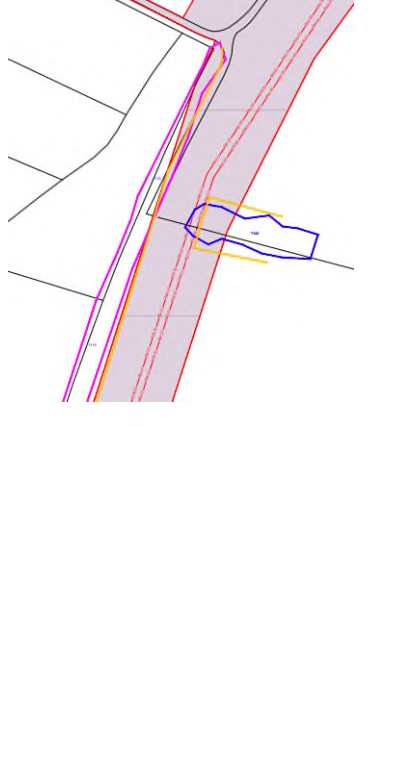
No comment from a planning perspective.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk. We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely,


CEMHD4 NSIP Consultation Team

Appendix G ExQ2 14.3 Woodland parcels

Mapped habitat (BNG report Figure A.1) [REP4-054]	Arboricultural Impact Assessment [REP1-035]	Notes
		<p>The habitat parcels (Sheet 6) are for lowland mixed deciduous woodland and are denoted by the pink arrows for ease of reference. The areas are 26m² and 42.7m². The corresponding arboricultural impact assessment plan (illustrated on page 71) shows that these small areas of woodland habitat are not being impacted by any tree works, with the BNG habitat mapped showing canopy over existing hardstanding.</p>
		<p>The habitat parcel (Sheet 6) is for other woodland; broadleaved and is denoted by the pink arrow for ease of reference. The area is 191m². The corresponding arboricultural impact assessment plan (illustrated on page 72, text in section 8.3) denotes this parcel in blue, showing a small area (T120) to have their crowns cut back and root pruning to occur to facilitate access, with the trees protected by fencing (orange line).</p>



The habitat parcel (Sheet 5) is for other woodland; broadleaved and is denoted by the pink arrow for ease of reference. The area is 377m². The corresponding arboricultural impact assessment plan (illustrated on page 73) denotes the trees which comprise the woodland habitat being T184, T185, T186 and T187. These are protected by fencing (orange line).

Get in touch

You can contact us by:



Emailing at info@cwwtpr.com



Calling our Freephone information line on **0808 196 1661**



Writing to us at **Freepost: CWWTPR**

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

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