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Our ref: **Deadline 5 Submission**

Your ref WW010003

19th February 2024

Anglian Water Services Limited – The Cambridge Waste Water Treatment Plant Relocation Project - WW010003 Deadline 5 (D5)

Application Ref: WW010003

Dear Deborah,

Please find enclosed submissions from Anglian Water Services Limited (the Applicant), requested by the Examining Authority (ExA) in the Rule 8 Letter (dated 24th of October 2023) (PD-007), by Deadline 5 (19th February 2024).

Comments on any submissions received at Deadline 4

The Applicant has provided comments on a number of submission received at Deadline 4, for ease of reference they have been combined into a single document called 8.23 Applicant's Responses to Deadline 4 submissions. This document includes responses to the following Deadline 4 submissions:

- National Highways [REP4-096]
- Christopher Smith - Written summaries of oral submissions made at any hearings [REP4-098]
- Conservators of the River Cam – Current Position Statement [REP4-099]
- Liz Cotton – Comments on any submissions received at D3 [REP4-100]
- Neos Networks Limited – Deadline 4 (D4) Submission [REP4-103]
- Nigel Seamarks - Deadline 4 (D4) Submission [REP4-103]
- Save Honey Hill - SHH Response to the Applicant's Responses to Written Representations 8.13 (REP2-038) [REP4-106]
- Save Honey Hill - SHH 34 Response to the Applicant's Responses to Written Representations AW 8.13 (REP2-038) [REP4-107 & REP4-108]
- Vodafone – Deadline 4 (D4) Submission [REP4-11]
- Waterbeach & District Bridleways Group – Comments on any submissions received at D3 [AS-177]

- South Cambridgeshire District Council (SCDC) – Local Impact Report Updates [REP4-092 & REP4-093]

Principal Areas of Disagreement Statement (PADS) & Statements of Common Ground

The Applicant provided initial versions of all Statements of Common Ground listed in Annex H of the ExA’s Rule 6 Letter issued on the 19th of September 2023. Those Statements that have been further progressed for Deadline 5 are listed below. There have been changes made to the Principal Areas of Disagreement Statement since its last submission and this is also included within the Deadline 5 submission.

App Doc Ref	Statement of Common Ground updated at Deadline 5
7.14.1	Cadent Gas
7.14.2	Cambridge City Council
7.14.3	Cambridge Water
7.14.4	Cambridgeshire County Council
7.14.5	The Emergency Services
7.14.7	National Highways
7.14.10	SLC Rail
7.14.11	South Cambridgeshire District Council
7.14.15	Internal Drainage Board – Swaffam
7.14.17	The Wildlife Trust
7.14.20	Internal Drainage Board – Waterbeach

Updated Book of Reference

The Applicant notes that Annex B of the Rule 8 Letter [PD-007] sets out that when the Applicant becomes aware that there has been a change in ownership, or a new interest in relevant land they should make the relevant person aware that they can make a request to the ExA to become an Interested Party under section 102A of the Planning Act 2008 by completing the form available on the Project Webpage. It also sets out that an updated Book of Reference should include confirmation that relevant persons have been informed of their rights under section 102A.

Since Deadline 4, the Applicant has identified 8 new persons with an interest in the relevant land and has updated the Book of Reference (App Doc Ref 3.3) accordingly. The resultant changes to the Book of Reference (App Doc Ref 3.3) are listed in the Schedule of Changes to the Book of Reference (App Doc Ref 3.4). The Applicant can confirm that letters have been sent to those 8 parties advising them of their right to apply to the Planning Inspectorate to become an Interested Party under s102A of the Planning Act 2008.

Compulsory Acquisition and Statutory Undertakers Schedules

As set out in Annex B of the Rule 8 Letter [PD-007] the Applicant has provided at Deadline 5 an updated Compulsory Acquisition (CA) Schedule (App Doc Ref 3.5) and Statutory Undertakers Schedule (App Doc Ref 3.6).

Updated dDCO & Updated Explanatory Memorandum

The Applicant has provided updated copies of the draft Development Consent Order (App Doc Ref 2.1) [Supersedes REP4-003 & REP4-004 (tracked)] and the Explanatory Memorandum (App Doc Ref 2.2) [Supersedes REP4-005 & REP4-006] to reflect updates committed to in our Deadline 3 and Hearing Action responses.

Flood Risk Assessment

At the preliminary meeting, the Applicant indicated that it intended to submit an updated Flood Risk Assessment (FRA) at Deadline 5. Annex A of this covering letter sets out why this has not been submitted and how the Applicant proposes to provide the updated document as an additional submission prior to the commencement of the next round of hearings (13th & 14th of March 2024).

Deadline 5 Examination Document Submissions

To assist the ExA and Interested Parties in navigating the latest submissions and to highlight where documents have either been superseded or where new documents have been provided, the Applicant has updated its Guide to the Application (App Doc Ref 1.3). Details of the documents submitted as part of Deadline 5 have been provided below along with the reason for the update.

Document Title and Application Document Reference <i>(and where relevant previous PINs ref)</i>	Reason for the update
Guide to application (App Doc Ref 1.3) <i>[Supersedes REP4-002]</i>	Master Document List updated to reflect updated submissions made to the Planning Inspectorate for Deadline 5 on the 19 February 2024.
Draft Development Consent Order (App Doc Ref 2.1) <i>[Supersedes REP4-003 & REP4-004 (tracked)]</i>	Updated for Deadline 5 to deal any updates as result of D4 submissions and ExQ2.
Explanatory Memorandum (App Doc Ref 2.2) <i>[Supersedes REP4-005 & REP4-006 (tracked)]</i>	Updated to reflect changes made to the draft Development Consent Order
DCO Changes Tracker (App Doc Ref 2.4) <i>[Supersedes REP4-007 & REP4-008 (tracked)]</i>	Updated to reflect changes made to the draft Development Consent Order

Document Title and Application Document Reference (and where relevant previous PINs ref)	Reason for the update
Book of Reference (App Doc Ref 3.3) <i>[Supersedes REP4-011 & REP4-012 (tracked)]</i>	Updated from the last submission with any new interests.
Schedule of Changes to the Book of Reference (App Doc Ref 3.4) <i>[Supersedes REP4-013 & REP4-014 (tracked)]</i>	Tracks the changes to the Book of Reference from the previous submission.
Compulsory Acquisition (CA) Schedule (App Doc Ref 3.5) <i>[supersedes REP4-015 & REP4-016 (tracked)]</i>	Updated to reflect progress
Statutory Undertakers Progress Schedule (App Doc Ref 3.6) <i>[Supersedes REP4-017 & REP4-018 (tracked)]</i>	Updated to reflect progress
Works Plans – Sheets 1 to 11 (App Doc Ref 4.3) <i>[Supersedes AS-150]</i>	Updated legend removing reference to ‘Works Areas’
Land Plans - Sheet 1 & 2 (App Doc Ref 4.5.1 & 4.5.2) <i>[Supersedes REP1-016]</i>	Amended for submission at Deadline 5 to reflect changes on sheets 3 and 7.
Hedgerow Regulations and Tree Preservation Plans – Sheet 1-7 & 9-10 (App Doc Ref 4.8) <i>[Supersedes REP4-021]</i>	Updated to reflect the retention of H27-H28 and the change in designation of several unaffected hedgerows.
Design Plans - Proposed Waste Water Treatment Plant Sheets 2 & 3 (App Doc Ref 4.9) <i>[Supersedes REP1-019]</i>	Updated to reflect correction in building heights.
Design Plans – Highways sheets 1 & 3 New sheet 7 (App Doc Ref 4.11) <i>[Supersedes APP-025]</i>	Updated to reflect an increase in bridge parapet height and inclusion of a new plan showing AIL routing.
Design Plans Waterbeach pipeline long sections Sheets 7 & 8 (App Doc Ref 4.14) <i>[Supersedes AS-156]</i>	Updated to reflect the HDDing under H19-H20.
ES Volume 2 Chapter 6 Agriculture and Soils (App Doc Ref 5.2.6) <i>[Supersedes AS-024]</i>	Updated to reflect ExQ2
ES Volume 2 Chapter 7 Air Quality (App Doc Ref 5.2.7) <i>[Supersedes APP-039]</i>	Incorporate Errata details & mitigation wording clarifications and updates

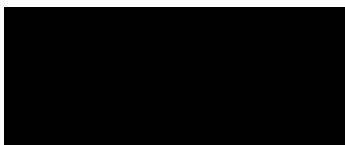
Document Title and Application Document Reference (and where relevant previous PINs ref)	Reason for the update
ES Volume 2 Chapter 8 Biodiversity (App Doc Ref 5.2.8) <i>[Supersedes REP4-024 & REP4-025 (tracked)]</i>	Updated to reflect comments from Natural England on the recreational group definition.
ES Volume 2 Chapter 10 Carbon (App Doc Ref 5.2.10) <i>[Supersedes REP4-026 & REP4-027 (tracked)]</i>	Updated to reflect ExQ2 responses
ES Volume 2 Chapter 12 Health (App Doc Ref 5.2.12) <i>[Supersedes APP-044]</i>	Update for Deadline 5 to incorporate Errata details and amendments to mitigation references
ES Volume 2 Chapter 13 Historic environment (App Doc Ref 5.2.13) <i>[Supersedes REP4-030 & REP4-031 (tracked)]</i>	Updated to reflect responses to ExQ2
ES Volume 2 Chapter 16 Material resources waste (App Doc Ref 5.2.16) <i>[Supersedes REP4-034 & REP4-035 (tracked)]</i>	Updated in response to ExQ2 17.1
ES Volume 2 Chapter 18 Odour (App Doc Ref 5.2.18) <i>[Supersedes APP-050]</i>	Updated to add errata and match mitigation tracker.
ES Volume 2 Chapter 19 Traffic & Transport (App Doc Ref 5.2.19) <i>[Supersedes REP3-021 & REP3-022 (tracked)]</i>	Updated to align with the Traffic Assessment updates.
ES Volume 4 Chapter 2 Appendix 2.1 Code of Construction Practice Part A (App Doc Ref 5.4.2.1) <i>[Supersedes REP4-040 & REP4-041 (tracked)]</i>	Updated to reflect responses to ExQ2.
ES Volume 4 Chapter 2 Appendix 2.2 Code of Construction Practice Part B (App Doc Ref 5.4.2.2) <i>[Supersedes REP4-042 & REP4-043 (tracked)]</i>	Updated to include septic tank monitoring.
ES Volume 4 Chapter 2 Appendix 2.5 Lighting Design Strategy (App Doc Ref 5.4.2.5) <i>[Supersedes REP4-048 & REP4-049 (tracked)]</i>	Updated to include the exploration of path lighting on the access path.
ES Volume 4 Chapter 2 Mitigation Tracker (App Doc Ref 5.4.2.6) <i>[Supersedes REP4-050 & REP4-051 (tracked)]</i>	Updated to clarify use of the written management system
ES Volume 4 Chapter 6 Appendix 6.2 Agricultural Impact Assessment (AIA) (App Doc Ref 5.4.6.2)	Updated to reflect responses to ExQ2.

Document Title and Application Document Reference (and where relevant previous PINs ref)	Reason for the update
[Supersedes REP1-031 & REP1-032 (tracked)]	
ES Volume 4 Chapter 6 Appendix 6.3 Outline Soil Management Plan (App Doc Ref 5.4.6.3) [Supersedes REP1-033 & REP1-034 (tracked)]	Updated to address NE comments.
ES Volume 4 Chapter 8 Appendix 8.14 Landscape, Ecological and Recreational Management Plan (LERMP) (App Doc Ref 5.4.8.14) [Supersedes REP4-056 & REP4-057 (tracked)]	Updated to reflect ExQ2 and include a new figure.
ES Volume 4 Chapter 8 Appendix 8.18 Wildlife Hazard Management Plan (App Doc Ref 5.4.8.18) [Supersedes APP-103]	Updated to refer to CAA regulations
ES Volume 4 Chapter 12 Mental Wellbeing Impact Assessment (MWIA) (App Doc Ref 5.4.12.3) [Supersedes AS-077 & AS-078]	Updated to reflect responses to ExQ2.
ES Volume 4 Chapter 13 Appendix 13.4 Historic Environment Impact Assessment Tables (App Doc Ref 5.4.13.4) [Supersedes REP4-066 & REP4-067 (tracked)]	Updated to reflect responses to ExQ2.
ES Volume 4 Chapter 14 Appendix 14.11 Generic Quantitative Risk Assessment (App Doc Ref 5.4.14.11)	New Document
ES Volume 4 Chapter 19 Appendix 19.3 Transport Assessment (App Doc Ref 5.4.19.3) [Supersedes REP3-034 to 039]	Updated to reflect responses made at ISH3 and associated action points and ExQ2.
ES Volume 4 Chapter 19 Appendix 19.7 Construction Traffic Management Plan (App Doc Ref 5.4.19.7) [Supersedes REP4-068 & REP4-069 (tracked)]	Inclusion of AIL figure.
ES Volume 4 Chapter 19 Appendix 19.8 Operational Workers Travel Plan (App Doc Ref 5.4.19.8) [Supersedes REP4-070 & REP4-071 (tracked)]	Updated EV Points
ES Volume 4 Chapter 20 Appendix 20.13 (draft) Outline Water Quality Monitoring Plan	Updated to reflect NE comments.

Document Title and Application Document Reference <i>(and where relevant previous PINs ref)</i>	Reason for the update
(App Doc Ref 5.4.20.13) <i>[Supersedes REP2-028 & REP2-029 (tracked)]</i>	
Strategi Carbon Assessment (App Doc Ref 7.5.2) <i>[Supersedes REP3-042 & REP3-043 (tracked)]</i>	Updated to reflect Deadline 4.
Principal Areas of Disagreement (App Doc Ref 7.7) <i>[Supersedes REP2-032 & REP2-033 (tracked)]</i>	Updated to reflect progress since last submission.
Design Code (App Doc Ref 7.17) <i>[Supersedes REP4-085]</i>	Updated to reflect ExQ2 responses.
Applicant's Responses to the Examining Authority's ExQ2 (App Doc Ref 8.22)	New Document
Applicant's comments on Deadline 4 submissions (App Doc Ref 8.23)	New Document
Outline Logistics Traffic Plan (App Doc Ref 5.4.19.10) <i>[Supersedes REP4-072 & REP4-073 (tracked)]</i>	Parking figures updated <i>Note: This document was submitted post certification of Schedule 18 of the draft DCO. It will be included in Schedule 18 at the next deadline.</i>

Should you have any questions please do not hesitate to contact me.

Yours sincerely



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Annex A – Flood Risk Assessment

At the preliminary meeting, the Applicant indicated that it intended to submit an updated Flood Risk Assessment (FRA) at Deadline 5. The original FRA submitted with the DCO, and agreed with the EA, makes use of Fluvial Model Report which relies on the use of a fluvial model obtained from the Environment Agency. The Environment Agency raised the issue, shortly before the commencement of the examination, that the fluvial model provided by them to the Applicant was dated from 2013 and advised in their Relevant Representations that new modelling would be available from 30 September 2023.

This modelling was received on 10 October 2023 and the Applicant began the process of rerunning scenarios with the updated 2023 fluvial model.

The Applicant completed model reruns using the updated 2023 fluvial model and released a draft of the updated FRA to the EA in December 2023. The EA reviewed the updated FRA and requested an additional model scenario be run. At ISH3, the Applicant confirmed that it had been asked to model an additional scenario by the EA and was hopeful that it would be able to submit an agreed updated FRA at Deadline 5. Following completion of the additional modelled scenario, the model results and FRA were shared with the EA and discussed at a meeting with them on 13 February 2024.

At the February 2024 meeting, the EA confirmed that the fluvial modelling was appropriate for the purposes of the FRA, but requested the Applicant model yet more additional scenarios. The Applicant is currently undertaking this work, but this unfortunately prevents the updated FRA from being submitted at Deadline 5. It is the Applicant's intention to complete this work as soon as possible and submit it in advance of the hearing scheduled for 13th March 2024 to enable it to be discussed if necessary. The Applicant will therefore ask the ExA to exercise its discretion to accept the updated FRA into the examination upon submission.

Nevertheless, at this stage the Applicant is confident that the fluvial modelling work undertaken demonstrates that the Proposed Development is not vulnerable to fluvial flood risk, and that the Proposed Development would have a negligible impact on fluvial flood risk elsewhere compared to the existing Cambridge WWTP, when the same population assumptions are applied to both existing and proposed WWTP.

To the extent that the potential for fluvial flood risk arises this would be due to increased flows from new development within the catchment (the location and extent of new development may vary over time) combined with modelled storm events. In that regard, the Applicant notes that national planning policy (see NPPF para 165-175) emphasises that both plan making and decision taking should seek to manage flood risk from all sources, including a consideration of cumulative flood risk. In circumstances, where increased flows from new development into the waste water network present an increased source of flood risk, the Applicant considers that the planning system will operate effectively to mitigate those flows at source. Mitigation measures for new development within the catchment would aim to reduce runoff volumes to watercourses and the waste water network, and may include Sustainable Drainage Systems

(SuDS), Flood Risk Management Schemes (FRMS), Property Flood Resilience (PFR), Community Resilience, and/or Natural Flood Management (NFM).