

Comments on the Applicant's D6 Submissions

This document sets out the comments by Cambridgeshire County Council (**CCoC**) on the Applicant's Deadline 6 (**D6**) submissions. The tables below set out the document in question that the Council is commenting on, together with the relevant paragraph or reference number.

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

4.8 Hedgerow Regulations and Tree Preservation Order Plans [REP6-005]

Topic	Paragraph Number	Council's Comment
Version History	i	We welcome the update to the document, which in combination with the Hedgerow Baseline Technical Appendix [REP6-063] resolves the Council's previous concerns regarding hedgerows. Therefore, all matters relating to hedgerows have been resolved.

5.4.2.1 ES Code of Construction Practice Part A [REP6-049]

Topic	Paragraph Number	Council's Comment
Bats	7.2.26 - 7.2.27	The Council welcomes confirmation that the bat mitigation to be agreed as part of Natural England licence process will be incorporated into the Habitat Management and Monitoring Plan. Therefore, all matters relating to bat mitigation (roosts) have been resolved.
Habitats	7.2.72 - 7.2.76	The Council welcomes further clarification with regards to pre-commencement habitat surveys and habitat reinstatement (for habitat to be temporarily lost during construction). Therefore, all matters relating to Biodiversity Net Gain / habitat reinstatement for habitats located outside of the Landscape, Ecological and Recreational Management Plan / Outfall Management and Monitoring Plan areas have been resolved.

5.4.2.5 Lighting Design Strategy [REP6-055]

Topic	Paragraph Number	Council's Comment
Guidance Note 08/23	2.4.10	The Council welcomes confirmation that the lighting scheme will be designed in accordance with the Guidance Note 08/23 Bats and Artificial Lighting in the UK. Therefore, all matters relating to bat mitigation (impact of lighting) have been resolved.
Lighting Design Objective 6	4.2.20	The Council welcomes confirmation that a dark corridor will be maintained along the Low Fen Drove Way Grasslands and Hedges County Wildlife Site. Therefore, all matters relating to County Wildlife Site mitigation (impact of lighting) have been resolved.

5.4.8.14 Landscape, Ecological and Recreational Management Plan [REP6-065]

Topic	Paragraph Number	Council's Comment
Indicative Creation, Management and Maintenance Plan – Responsibilities and Requirements	4.1.2	The Council welcomes the confirmation that membership of the Advisory Group will include Cambridgeshire County Council, along with Natural England, Wildlife Trust, National Trust and Parish Councils.

5.4.8.23 Outline Outfall Management & Monitoring Plan [REP6-067]

Topic	Paragraph Number	Council's Comment
Works No. 39	Sections 4.4 & 5, Tables 5-1, 5-2, 6-1 & 7-1	The Council welcomes the update of the Outline Outfall Management and Monitoring Plan to cover all habitats within Work No. 32 and 39. Therefore, all matters relating to all habitat mitigation / enhancement proposed for Work No. 32 & 39 have been resolved.

5.4.2.1 ES Chapter 2 Appendix 2.1 Code of Construction Practice Part A (Tracked) [REP6-050]

Topic	Paragraph Number	Council's Comment
Public Rights of Way	7.6.16 and 7.6.18	The Applicant's D6 submission [REP6-050] does not address the concern raised by the Council at the previous deadline. It is requested that the wording of paragraph 7.6.18 is revised as follows:

		First line to be altered to: “The Applicant will require the Principal Contractor(s) to adhere to the following guidelines with regard to any proposed diversion or temporary suspension of PROW ”.
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5.4.10.2 Appendix 10.2 Outline Carbon Management Plan [REP6-070]

Topic	Paragraph Number	Council’s Comment
Offsetting definitions	2.3	The Council welcomes the inclusion of offsetting definitions in the outline carbon management plan, in particular the criteria of additionality and permanence, and the differentiation between avoidance and removals.
Offsetting principles	4.1.4 to 4.1.6	The Council is supportive of the principles outlined in paragraph 4.1.5. However, it would be helpful to also refer to the definitions in paragraph 2.3 here and specify that offsets should meet the criteria of additionality and permanence. It would also be good to consider independent verification of offsets as a principle. Finally, it would be useful to include in the principles whether removals would be prioritised over avoidance.
Process emissions	3.3.8 and 3.3.9	The Council welcomes the Applicant’s recognition that direct process emissions of methane and nitrous oxide will arise from the treatment of wastewater and sewage sludge, that are not currently included in the assessment of operational emissions. It would be useful to get an indicative timeline regarding when the Applicant expects to have an agreed best practice measurement approach for these emissions from the water sector regulators, and when such measurement and reporting can commence.

7.8 Community Liaison Plan [REP6-097]

Topic	Paragraph Number	Council’s Comment
Aims and objectives	2.2	To ensure that Section 2 better reflects 3.2.2 (3.2.2 Duties will include: Work collaboratively with the Principal Contractor(s) to ensure that the various elements of the stakeholder liaison and associated consents and commitments are coordinated and monitored to comply with all statutory and contractual obligations),

		<p>the Council suggest a number of amendments, with additions shown in green, and deletions shown in red:</p> <p>2.1.5 The purpose of the Community Liaison Plan is to ensure that engagement and communication with the community is appropriate, accessible, timely, targeted, transparent and easily understood.</p> <p>2.2 Aims & Objectives</p> <p>2.2.1 The aim of the Community Liaison Plan is to set out the approach to engaging, communicating, and liaising with the community during the construction of the proposed development. Delete: 'and to make sure the community are informed of activities and developments relating to construction and.' This Outline Community Liaison Plan sets out the form of the final Plan</p> <p>2.2.2 The objectives of the CLP are to:</p> <ul style="list-style-type: none"> • Facilitate and support all appropriate engagement, communications and liaison with communities, and their individual members, in connection with effecting/supporting mitigations of effects/impacts of the project on members of those local communities. Mitigations include, but are not limited to, those environmental mitigations in the: Environmental Statement, Code of Construction Practice (CoCP) Parts A & B: and Construction Traffic Management Plan (CTMP). • Ensure that the Communities are informed of activities and developments relating to construction • Create a simple process through which local people can contact the project team with questions or concerns. • Respond to questions and concerns clearly and promptly. • Update the local communities on key project activities and developments. • Ensure two-way communication channels to ensure that feedback is received back into the project from the communities. • Be socially responsible, building relations with the local communities and being a good neighbour.
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Hard to Reach Groups	4.2	<p>The Council suggest the following revisions, with proposed additions show in green:</p> <p>4.2.1 Anglian Water Services Limited recognises that some individuals or groups may have difficulties taking part in the communicating with the project for a range of reasons, which may include physical, economic or social challenges. Groups have been identified that represent people with protected characteristics under equalities law in the project area. This includes organisations that may be able to assist those that are excluded from digital engagement within the consultation area and/or subject to other barriers to engagement. These organisations will be contacted prior to commencement of the Community Liaison Plan to ensure that the approach taken best meets the needs of its members and to help facilitate engagement with these groups through the use of suitable material such as imagery, leaflets and diagrams. This includes engaging the Ormiston Trust to support ongoing liaison with the local Gypsy and Traveller communities prior to and throughout the construction phase.</p>
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5.2.17 Environmental Statement Chapter 17: Noise and vibration [REP6-034]

Topic	Paragraph Number	Council's Comment
Emergency generators		The present iteration does not state that the Emergency Generators have been scoped out and removed, but does not seem to refer to any assessment of them in the chapter. Please can the applicant clarify this.

5.2.18 Environmental Statement Chapter 18: Odour [REP6-036]

Topic	Paragraph Number	Council's Comment
Impacts scoped out of the assessment	2.7.1	Odour from the vent stack has been scoped out of the odour assessment. The Council are of the view that it should be scoped in.

<p>Presence of Vent in existing WWTP (site)</p>	<p>4.3.69 - 4.3.81</p>	<p>It appears that odour from the vent stack would be covered by an Environmental permit. The Council has requested confirmation from the EA on this matter but to date has not had a response.</p> <p>If the vent stack is covered by the permit, then controls would be embedded within it, and these would include filter maintenance. If Odour Management Plans (OMP) are dynamic documents then, with the introduction of residential receptors on the site in due course the OMP would need to be revised and updated to take the new circumstances into account.</p> <p>It appears that, having regard to Policy 18 and supporting paragraphs of Minerals and Waste Local Plan (MWLP), the Inspectorate must be satisfied that the proposed odour control/neutralisation is suitable and sufficient to robustly protect health and amenity throughout the life of the proposed development, this would include decommissioning and aftercare of the existing CWWTP site.</p> <p>The Council requests that PINs ensures that there are provisions for the control of odour emissions from the vent stack either under the DCO or satisfaction that this will be covered under the environmental permit. This will ensure that, either way, Policy 18 of the MWLP is robustly complied with.</p>
<p>Decomissioning</p>	<p>4.4 4.4.12</p>	<p>The human health impacts of the measures set out in this paragraph need to be assessed and advised.</p> <p>The Council would defer to Cambridge City's Environmental Health Officers on matters of land contamination, but the County's Public Health team would want to comment on impacts to human health from the process of cleaning the tanks once more information is made available.</p>