

Cambridge Waste Water Treatment Plant Relocation Project  
Anglian Water Services Limited

# Applicant's Post Hearing Submission

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**Revision No. 1**  
12 April 2024

Issue Specific Hearing 5 – Traffic and Transport				
Agenda Item	Paragraph	Matter	Sub-paragraph	Applicant's Submission
2(a) Update from Applicant	2.1	Summarise work undertaken since ISH4 and changes made to application documents.	2.1.1	<p>The Applicant confirmed that there has been a thorough review of ES Chapter 19 [REP6-037] and the Transport Assessment ("TA") and associated documents, by the Mott MacDonald team who produced them and an independent external review led by Mike Axon of SLR Consulting, who has produced a summary document. There has also been a reappraisal of the rest of the ES in the light of the change to some of the numbers emerging from the review of ES Chapter 19. In summary, the only two chapters of the ES where there are changes are Noise (App Doc Ref 5.2.17) [REP6-033] and Air Quality (App Doc Ref: 5.2.7) [REP6-013]. There are also some Chapters which are parasitic on Noise and Air Quality and sub-parasitic on Transport, such as biodiversity. The Applicant confirmed that Claire Squires can explain the changes if required. The Noise and Air Quality experts are also present if needed.</p> <p>The ExA asked if this was in broad terms that there has not been a worsening of the traffic and transport position. The Applicant confirmed this was correct and that there were no material changes.</p>
		Clarify whether changes made necessitate any changes to other ES chapters.	2.1.2	<p>James Brookes spoke on behalf of the Applicant to explain the changes to ES Chapter 7 on Air Quality. The Air Quality model uses the same information for vehicle movements as used in ES Chapter 19. The changes have been reviewed for construction and operational vehicle movements. The Applicant's air quality assessment considers receptor location likely to experience the largest change or the largest concentration within 200m of an affected road. An affected road is defined by EPUK and IAQM as roads with a daily change on an AADT basis more than 500 light duty vehicles or 100 heavy duty vehicles.</p> <p><u>Construction</u></p>

			<p>For the construction phase, the Applicant looked at the Proposed WWTP and transfer tunnel access from Horningsea Road, Waterbeach Pipeline North access via the A10 and the existing Cambridge WWTP/transfer tunnel south access from the A1309 as the four key areas for construction traffic. It looked at aggregate for vehicles in all areas. The roads that met the 500 LDV or the 100 HDV change were the A14 between J32 and J34, A14 J34 slip roads and Horningsea Road access to the proposed WWTP.</p> <p>The change to construction traffic from those assessed in the ES for vehicles going towards the proposed WWTP is ten fewer HDVs and nine more LDVs so on balance, fewer traffic movements. There are five fewer HDVs for those accessing the transfer tunnel and no change in LDVs. Overall, fewer vehicles on Horningsea Road and the A14 J34 slip roads.</p> <p>For the A10, there is no change to HDVs and 14 more LDVs.</p> <p>On the A1309, there is no change to LDVs and 8 more LDVs.</p> <p>The Applicant explained that the Air Quality modelling would usually use the annual average daily traffic flow and this is the case for the existing traffic on the roads. The construction traffic used is the typical daily construction vehicle movements during the combined construction peak. For Air Quality, it is adding a peak construction flow to an existing annual average daily traffic to assess against an annual mean quality objective.</p> <p>For the proposed WWTP and transfer tunnel access via Horningsea Road, construction vehicle movements are reductions and would therefore decrease emissions to air from the construction phase, albeit by a marginal and non-material quantity.</p> <p>For Waterbeach Pipeline north accessing via the A10, there are 14 additional LDVs construction movements, from 14 to 28. For existing Cambridge WWTP and Waterbeach pipeline south on the A1309, there are 8 additional LDVs from 47 to 55. Both</p>
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			<p>remain less than the criteria of 500 LDVs per day and would still not be assessed.</p> <p><u>Operation</u></p> <p>In terms of operation, the ES assessed 146 HDVs per day and 92 LDVs per day.</p> <p>The revised traffic data changes 92 LDVs to 176, an increase of 84 movements at the proposed WWTP. No change in HDV movements.</p> <p>To put the change in context, the 146 HDVs and 92 LDVs assessed in the ES equates to an increase in pollution concentration of less than 0.1 micrograms per metre cubed (<math>\mu\text{g}/\text{m}^3</math>). These are low because of the distance between the road sources and the receptors. The total concentrations predicted are less than 75% of the standards, meaning an increase of up to <math>2\mu\text{g}/\text{m}^3</math> for nitrogen dioxide and <math>\text{PM}_{10}</math> and <math>1\mu\text{g}/\text{m}^3</math> for <math>\text{PM}_{2.5}</math> would still have a negligible effect. This increase equates to a substantial change in emissions well above the number of movements being considered.</p> <p>An explanatory paragraph will be added to ES Chapter 7 at Deadline 7.</p> <p>The Applicant confirmed there are no changes in the significance of effects.</p>
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			2.1.3	<p>In terms of Noise in ES Chapter 17, the approach and methodology to determine the magnitude of impact is slightly different. This uses the DMRB.</p> <p>The construction phase road traffic noise impacts, accounting for the changes in the traffic and transport numbers, results in a change in noise levels of no greater than 0.1 decibels. This is very marginal. There is no change in the magnitude of impact or significance of effect.</p> <p>For changes in operational road traffic noise, the methodology also follows DMRB. The change in traffic flow values would result in a noise level change of less than 0.1 decibels. There is no change in magnitude of impact, which remains negligible, and the significance of effects is unchanged.</p> <p>The Applicant confirmed that ES Chapter 17 will be updated at Deadline 7.</p>
		Purpose of SLR's Transport Review – whether this is intended to corroborate the Applicant's other traffic and transport documents and provide greater confidence in the Transport Assessment and ES Chapter 19, and if so, whether the ExA should draw from its conclusions in its Recommendation	2.1.4	<p>The Applicant explained that it understood there was a lack of confidence in the traffic and transport review and therefore Mike Axon was asked to undertake a peer review and bolster confidence if possible in the work that was undertaken. Mr Axon reviewed the approach, the assumptions and the modelling in ES Chapter 19 order to make his own judgment. The outcome was that the judgments in ES Chapter 19 were sound and the ExA can and should give weight to the conclusion of Mr Axon.</p> <p>The Applicant confirmed Mr Axon's review guided the review of ES Chapter 19. The Chapter and the TA were revised accordingly as a result of Mr Axon's review.</p> <p>The ExA asked if other Chapters needed updating, such as biodiversity. The Applicant confirmed that they do not need updating, but that it would be appropriate to include a note explaining this at Deadline 7.</p>

				<p>In terms of Chapters which relate back to Air, Noise and Traffic and Transport, the Applicant confirmed that these are:</p> <ul style="list-style-type: none"> <li>• Biodiversity</li> <li>• Community</li> <li>• Health</li> <li>• Historic Environment</li> <li>• Landscape and Visual Impacts</li> <li>• Cumulative Effects.</li> </ul> <p>The Applicant confirmed that the models used for Carbon do not directly relate to vehicle movements. The Applicant confirmed that there were no changes to Major Accidents and Disasters.</p> <p>The ExA confirmed it would be happy with a standalone note as to why some Chapters need updating and others do not. The Applicant confirmed that for Noise it can add in the flows that are altered and update the numbers, but that for other Chapters, the ExA's proposal would be a more efficient approach.</p> <p><b>[Post-Hearing Note:</b> This standalone note (App Doc Ref 5.4.19.14) has subsequently been prepared and submitted at Deadline 7 in response to Action Point 1.]</p>
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<p>2(b) Clarification in relation to the Applicant's recent Additional Submissions</p>	<p>2.2</p>	<p>Miscellaneous</p>	<p>2.2.1</p>	<p>The ExA turned to the SoCG Emergency Services (App Doc Ref 7.14.5) [REP6-106] and Table 4.6. The ExA said it had been sent this as a signed document but this refers to wording being added to CoCP Part A (App Doc Ref 5.4.2.1) [REP6-049] which does not appear to have been added. The ExA referred to paragraph 3.1.10 of the CoCP which does not mention emergency services.</p> <p>The Applicant said it was aware that the updated SoCG needs to go in at Deadline 7 to give the necessary tie up on this point.</p> <p>The ExA said this was an issue which is across other documents, where the undertakings which have been given do not follow through into the mitigation documents.</p> <p>The Applicant confirmed it would look at this and submit a revised SoCG at Deadline 7.</p> <p>The ExA said another observation was that some were submitted in draft, but the version control called it the final version. The ExA said it was raising that so other people are not misled. The Applicant acknowledged this.</p> <p><b>[Post-Hearing Note:</b> The Applicant has made amendments following this feedback and submitted at Deadline 7, as detailed further within the response to Action Point 2.]</p> <p>The ExA turned to the LEMRP (App Doc Ref 5.4.8.14) [REP6-065] and Figure 3.12. The ExA said a point appears to have been removed from the map and it may be worth checking and re-submitting this since it is being claimed as a benefit. The Applicant confirmed it would check this for Deadline 7.</p> <p><b>[Post-Hearing Note:</b> The LERMP (App Doc Ref 5.4.8.14) has subsequently been updated and submitted at Deadline 7 in response to Action Point 3.]</p>
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			2.2.2	<p>The ExA turned to the Applicant's Responses to ISH4 Actions [REP6-116] and PDF page 18 where it starts 'furthermore'. The ExA asked what the difference is between WROL and the water resources team as mentioned in the response to the Action Point. The Applicant explained that water resources and WROL are two separate functions. WROL, which used to be RES manages the tanker fleet and which is based at the existing WWTP at Milton.</p> <p>The ExA asked why the water resources use is likely to be temporary. The Applicant explained that it was trying to work towards a more sustainable means of transport in the Gateway Building.</p> <p>The ExA asked if this meant that the parking spaces would be used by another party and if so, who is envisaged to use those?</p> <p>The Applicant suggested that Mike Axon respond as part of the work undertaken has been to think in greater depth about sustainable transport more generally and parking management as part of that. Mr Axon explained he has had discussions with the Applicant about how sustainable transport can work and what the intention is for that. One of the issues with parking is that if it is provided, there is danger of encouraging people to actually use it and travel by single occupancy car. For the most part, the Applicant says that the parking spaces are not needed and it is not desirable that they are all filled. The Applicant is discussing a management approach to this.</p> <p>For facilities such as this, there are circumstances of emergency or different weather conditions where there need to be more people on site than usual. The management system segregates the parking spaces on those needed day to day and those needed in an emergency. It is the intention to prioritise parking for these categories: car sharing, EV vehicles and operational vans. There may not then be a parking space for people to use unless they fit into one of these categories. This forms part of a wider discussion on sustainability.</p>
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			<p>In terms of operational staff numbers beyond 2041, the ExA asked what that increase comprises and the order of magnitude of that increase? The Applicant explained that post-2041 technology may change as the works will likely expand to treat a greater population. It is difficult to put an exact number on the increase to employees to the WWTP but there may be additional maintenance requirements in order to increase operation but this will not be a large number.</p> <p>The ExA asked if there were proposals to put in a management regime for parking via the DCO. The Applicant referred to the Operational Workers Travel Plan ("OWTP") (App Doc Ref 5.4.19.8) [<b>REPS-079</b>], secured by Requirement 12. The ExA noted that this Plan has not been updated to specifically include these things. The Applicant confirmed it can do so to add greater transparency and specificity but that it would take instructions on this point. The ExA said if it is not in the OWTP, it cannot give it great weight.</p> <p><b>[Post-Hearing Note:</b> The Operational Workers Travel Plan (App Doc Ref 5.4.19.8) has subsequently been updated and submitted at Deadline 7 in response to Action Point 4.]</p>
			<p>2.2.3</p> <p>[The Applicant confirmed during the hearing of agenda item 2(e) that there would be definite commitments to the sorts of matters which Mr Axon had described regarding parking management and that it is the Applicant's intention to flesh out the documentation to address these matters. The Applicant confirmed it would deal with this at Deadline 7].</p>
		<p>Table 1-4 of ES Chapter 19 states that traffic data is provided in 'Traffic Survey Data and Comparison' (Appendix 19.1, (App Doc Ref 5.4.19.1). However,</p>	<p>2.2.4</p> <p>The ExA said it has not been able to find this document. The Applicant explained that 5.4.19.1 is correct but the name of the document is not correct and it should be Baseline Traffic Surveys.</p>

		document 5.4.19.1 in the Examination Library is titled 'Baseline Traffic Surveys' [APP-141]		
		Clarification of accuracy of bus frequency information given that this dates from 2022.	2.2.5	The ExA asked if there has been any change to frequency since 2022. The Applicant confirmed it has undertaken a review since 5 April and that there are no changes to the services.
		Whether the bus route 19 journeys (e.g. at paragraph 3.1.65 of ES Chapter 19) are four journeys in one direction or two journeys in each direction.	2.2.6	The ExA asked if this was four journeys in one direction or two return journeys. The Applicant referred to TA, which confirms there are two services in each direction, so in the morning services at 7am and 9.30am and in the afternoon, two services at 12.30pm and 5.55pm. In short, it is two journeys in each direction
		Whether the Proposed Development involves any improvements to public transport services, or whether any forthcoming improvements are known about.	2.2.7	The Applicant confirmed that the application does not propose any improvements to public transport. Taking the number of staff and the number proposed to be travelling by public transport, which equates to 3 people a day, the Applicant is of the view that this does not warrant improvements and nor have the local authorities requested that.  The Applicant confirmed it has checked for planned changes to public transport and identified a shuttle bus services, but the route would not be any of the roads in the vicinity of the WWTP.
		Paragraph 3.1.30 of ES Chapter 19 states that the nearest railway station is Waterbeach, located approximately 2.5km to the north. Clarification of whether this is reference to the existing station, and if so, what the	2.2.8	The ExA asked if this was a reference to the existing Waterbeach station. The Applicant explained that the distance report is a crow fly distance from Horningsea to the existing Waterbeach station.  The ExA asked what the distance is from the proposed WWP to the nearest station. The Applicant said it was Cambridge North and not Waterbeach and the distance is 3.6km. The distance to the existing Waterbeach station would be 4.1km.

		<p>distance would be to the relocated station</p> <p>And</p> <p>Confirmation of the distance from the nearest railway station to the pedestrian entrance to the proposed Waste Water Treatment Plant (WWTP) and whether this would be considered to be a reasonable walking distance.</p>	<p>The ExA asked if it was realistic to assume people would use the train if it was 3.6km away. The Applicant explained that the walk would take an hour and therefore this is unlikely but it may be used by people on bikes or scooters. The County Council may have something to say about the expansion of their scooter network in due course.</p> <p>As to Route 19, the frequency and regularity of the bus service is quite low so it is not something, which is a good attractor and this is part of the reason why the Applicant is looking at the management system, previously referred to.</p> <p>The ExA asked how it would be recorded if someone came by train and then cycled. The Applicant explained that the travel plan coordinator is there to understand how everyone travels to and from part of the site. Often surveys ask 'what is the main mode of transport?' but the most pertinent point will be 'how did you come to this site today'?</p> <p>In response to comments from Liz Cotton, the Applicant explained that because there is such a minimal change in Air Quality, the effects have not been reconsidered in Health or Community. The Applicant further explained that all of the receptors modelled have very low concentrations and when you compare them to the Air Quality objectives, they are in keeping with those.</p> <p>The Applicant explained that in terms of current progress and sustainable fuels across the fleet, it has 387 EV. 80 of the 2000 vans are full EV or hybrid. The Applicant was one of the world's first companies to have fully EV HGVs in production. It has a strong commitment as a business to carbon net zero by 2030 and using alternative fuels is part of that, whether by biogas or EV.</p>
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			2.2.9	<p>Charles Jones asked about the baseline compared to the existing WWTP where the public transport links are better. The ExA said it was interested in this point.</p> <p>The Applicant said it might be helpful to complete the picture on sustainability, public transport and accessibility. As for accessibility, there are two heads: social inclusion and carbon effects. Social inclusion is to ensure that no member of staff is disadvantaged by not having a car. That takes into account the public transport and the measures that the Travel Plan has to bring in, such as car sharing. As for carbon effects and minimising these, this concerns whether if one does travel, that one is making sensible choices. The target of net zero by 2030 is ambitious and a number of elements form part of that, such as the parking management system and the roll out of EVs.</p> <p>In response to the question about how people currently travel to the existing WWTP and how that might change, the Applicant explained that a proportion travel in vans due to a necessity of the way they work but there is an opportunity for them to take advantage of the good public transport networks in the area of the existing WWTP. The Applicant acknowledged that the new WWTP is not as good for transport links and therefore the Applicant has to provide the social inclusion and minimisation of the carbon effect.</p> <p>The ExA said that the difficulty in assessing that comparison is that it does not have the baseline data. The Applicant confirmed that SLR is a world leading business in sustainable travel and bringing SLR into the conversation has helped to bring to life the commitments which were already in the various documents which sit under Requirement 12. The advice from SLR has started to open up forward thinking for the new WWTP, but the Applicant acknowledged that the express data was not there.</p>
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		ES Chapter 19 paragraph 4.2.299 (operational traffic at existing WWTP) – clarification over what time period would 280 daily two-way movements be made and the reasons why the number has increased from 192 to 280 daily two-way vehicle movements.	2.2.10	<p>The Applicant explained that in terms of the time period over which the movements apply, the existing WWTP will remain operational until the new WWTP is operational. In paragraph 4.4.2 of ES Chapter 19, it confirms decommissioning is due to start in June 2027 and therefore the movements will continue up to then.</p> <p>The ExA asked if daily meant 24 hours. The Applicant confirmed it did not. It relates to the day time period.</p> <p>The Applicant acknowledge the difference in numbers between the revised ES Chapter 19 submitted. In revision 5, paragraph 4.2.251 and the bullets beneath it refer to 192 (car and LGV movements) and 88 (HGV). The Applicant confirmed it was a change in description rather than the magnitude of traffic flow.</p>
		Whether Table 4-79 of ES Chapter 19 tests the scenario where 'surplus' parking spaces give rise to peak hour journeys, and hence why the totals are different from those in paragraph 4.2.299.	2.2.11	<p>The Applicant confirmed that the assessment of operation of the Proposed Development considers a reasonable worst case (RWC) scenario. As set out in paragraph 4.1.10 of the ES Chapter 19 (App Doc Ref 5.2.19) [AS-190], the RWC scenario considers a situation where the office staff, operational staff and Discovery Centre visitors all arrive or depart in the peak hours. The peak hourly traffic movements presented in Table 4-79 reflect the RWC scenario and have therefore been determined based on all parking spaces within the proposed WWTP being occupied in the peak hours.</p> <p>The daily total vehicle movements presented in Table 4-79 of ES Chapter 19 (App Doc Ref 5.2.19) [AS-190] are for the proposed WWTP while the daily total vehicle movements presented in paragraph 4.2.299 in ES Chapter 19 (App Doc Ref 5.2.19) [AS-190] are the daytime vehicle movements to the existing Cambridge WWTP during the period when construction activities would be in progress.</p>

				The principal difference between the figures in Table 4-79 and paragraph 4.2.299 is that the former includes out of hours HGV movements associated with sludge deliveries, while the latter only includes HGV movements during the daytime while construction works are in progress.
		The assessment focuses on peak periods to establish a worst-case scenario - clarification around general working hours and days of working during the construction phase	2.2.12	The Applicant confirmed that the working hours are set out in Table 5.1 of CoCP Part A. The ExA noted that this does not mention excluding Sundays or bank holidays. The Applicant said that the Table set outs normal working hours in winter and summer, covering Monday - Saturday but not Sunday. Further down the Table, there is provision for working on Sundays in very special circumstances or where there is a need for continual working due to time critical activities.
		Details of the general working hours and days of working during operation and the hours for sludge deliveries	2.2.13	The Applicant was asked where this is set out. The Applicant confirmed it is in Chapter 2 Project Description (App Doc Ref 5.2.2) [ <b>REP6-009</b> ] and paragraph 5.1.2.  The Applicant asked if this was in any operational document rather than just the ES. The Applicant confirmed it was in the Outline Operational Logistics Travel Plan (App Doc Ref 5.4.19.10) [ <b>REP6-082</b> ].
		Whether the Code of Construction Part A or any other mitigation documents should make specific provision for no working on Sundays and Bank / Public Holidays.	2.2.14	The ExA asked if bank holidays would be excluded as a matter of course for construction and operation. The Applicant confirmed that it would not expect bank holidays to be the norm but time critical activities may mean that bank holidays need to be worked. For operation, the sludge tanker is a 24 hour operation so this could be required over bank holidays but a full staff on the WWTP is unlikely. However, this depends upon the circumstances. The movements would be greatly reduced but there would still be a need for some movements.

				<p>The Applicant confirmed that for the existing WWTP, from time to time, bank holiday working is required and so there is no change with the new WWTP.</p> <p>The ExA asked if Table 5.1 could be updated to confirm that bank holidays are not worked as a matter of course. The Applicant confirmed it could.</p> <p><b>[Post-Hearing Note:</b> The Code of Construction Practice Part A (App Doc Ref 5.4.2.1) has subsequently been updated and submitted at Deadline 7 in response to Action Point 5.]</p> <p>Turning to SHH, the Applicant confirmed it will respond to SHH's Deadline 6 submissions at Deadline 7.</p> <p><b>[Post-Hearing Note:</b> The Applicant has provided at response to SHH's Deadline 6 submissions on traffic and transport matters in the Applicant's Comments on Deadline 6 Submissions (App Doc Ref 8.29) submitted at Deadline 7 and in response to Action Point 6.]</p>
2(c) Assessment of effects	2.3	Whether ES Chapter 19 Table 5-1 (summary of traffic and transport effects) is complete and if not, the reasons for this.	2.3.1	<p>The Applicant confirmed that this Table 5-1 was complete but noted that there were a number of apparent gaps relating to proposed monitoring but some of those are to do with the Table breaks. In other places, the proposed monitoring is outlined in the relevant management plan but the specific details as to how monitoring will be addressed has not yet been agreed with the relevant local authority.</p> <p>The ExA turned to the operational impacts in Table 5-1. The ExA noted that Table 5-1 only reported on the assessment of fear and intimidation during the operation phase, but that the assessment had also considered impacts on severance, driver delay and accidents &amp; road safety that were not reported in Table 5-1.</p> <p>The Applicant confirmed that the assessment of the operational phase had also considered severance, driver delay, and</p>

				<p>accident and safety, and confirmed that these would be added to Table 5-1.</p> <p><b>[Post-Hearing Note:</b> The Applicant has updated ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) and submitted at Deadline 7 in response to the above and Action Point 7.]</p>
			2.3.2	<p>The Applicant was asked to explain abnormal loads during the operational phase. The ExA said that Table 5-1 assumes abnormal loads during operation but these have not been assessed. During construction, abnormal loads are controlled through the Construction Traffic Management Plan (App Doc Reg 5.4.19.7) <b>[REP6-080]</b>.</p> <p>The Applicant said that during operation, abnormal and hazardous loads would not be expected as part of normal operation of the proposed WWTP. Abnormal and hazardous loads may only ever be required in exceptional events such as during maintenance of critical infrastructure or plant replacement, which is expected to happen very infrequently. If required, they would be dealt with through the normal ways in which statutory undertakers deal with this matters, such as discussions with the police.</p> <p>The ExA said that the summary does not seem to correspond with what is in the ES and asked for this to be aligned. The Applicant took this point away.</p>

				<p><b>[Post-Hearing Note:</b> The Applicant has updated ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) and submitted at Deadline 7 in response to the above and Action Point 7.]</p>
		<p>Explanation of why the significance of effects summarised in Table 4-84 of ES Chapter 19 should be revised from 'significant' to 'not significant' as described in paragraph 4.3.17</p>	<p>2.3.4</p>	<p>The ExA referred to paragraph 4.3.19 in the latest ES Chapter 19 and noted that the bullet points set out some mitigating factors and then the assessment of significance has been reduced. The ExA asked if this was the correct approach.</p> <p>The Applicant explained that a staged approach has been taken and it is intended to give transparency in the way the assessment has been done. It uses the thresholds in the IEMA guidance. IEMA is guidance and in that guidance it sets out that the assessment is not a literal case of applying the thresholds, professional judgment is also needed, taking into account the specific conditions of the location. The second stage of the assessment applies that professional judgment and sets out the reasons why the Applicant believes the literal outcome of applying the IEMA guidance is not appropriate in this location, namely putting the outcome into context and looking at the mitigation in place.</p> <p>Mr Axon explained that there is a difference of opinion on the IEMA guidance and his view is that one takes into account all of the factors in the guidance and anything else one can think</p>

				of at the time and then brings them together. There is no actual empirical trigger point which one starts with. Mr Axon noted that Mr Webber for the Applicant had taken a staged approach but that they had reached the same conclusion.
		Explanation of why the significance of effects summarised in Table 4-88 of ES Chapter 19 should be revised from 'significant' to 'not significant' as described in paragraph 4.3.31	2.3.5	Answered by above point.
		Driver delay at Junction 34	2.3.6	<p>The ExA said it struggled to find where this was in the Deadline 6 submissions. The Applicant stated that what the ExA is picking up is a change in the outcome of assessment in different versions of ES Chapter 19. The Applicant said it had identified an issue with double counting of traffic on Horningsea Road which led to the junction being portrayed as worse than it would actually be. Within the IEMA guidance, that sets out the assessment for a trigger for driver delay which is if a junction is close to capacity. The double counting has been corrected and the junction therefore operates well within capacity and no longer meets the threshold for assessment.</p> <p>The Applicant turned to paragraph 4.2.96 of ES Chapter 19. The Applicant explained that it set out an explanation in this paragraph.</p> <p>The ExA asked if it would hurt to have a more explicit explanation that Junction 34 no longer meet these thresholds. The Applicant confirmed it could do that.</p> <p><b>[Post-Hearing Note:</b> This explanation has been added to the version of ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) provided at Deadline 7 in response to Action Point 8.]</p>

		Shoulder peak assessment	2.3.7	This was not directed at the Applicant.
2(d) Mitigation	2.4	Noting that there have been changes to the magnitude of construction phase impacts (Table 4-1 of ES Chapter 19), whether Interested Parties (IPs) are satisfied that the proposed mitigation is still appropriate, whether any other mitigation is needed or whether any of the proposed mitigation is now unnecessary.	2.4.1	<p>The ExA asked if the proposed operational mitigation was required given that J34 does not need to be assessed. The Applicant said that with the assessment now presented in Chapter 19, this concludes no residual effects on J34 and therefore in that context the time restrictions on peak movement set out in the Operational Logistics Travel Plan ("OLTP") (App Doc Ref 5.4.19.10) [<b>REP6-083</b>] are no longer needed, however, the Applicant is mindful that it has already made a commitment and it is willing to honour that.</p> <p>In response to comments from SHH, the Applicant confirmed it would need to take the point away and respond fully at Deadline 7. The ExA noted the Action Point to respond to comments from SHH.</p> <p><b>[Post-Hearing Note:</b> The Applicant has responded to SHH's comments in the Applicant's Comments on D6 Submissions (App Doc Ref 8.29) provided at Deadline 7.]</p> <p>The Applicant said it understood the thrust of the comments from SHH to be based around school trips but now that it had heard further from SHH, it will reflect on that and respond by Deadline 7.</p> <p>The Applicant further explained that commitments in the OLTP are commitments and not dependent upon further assessment.</p> <p>In response to comments from Liz Cotton, the Applicant confirmed that a number for the public to contact will be set out in the Community Liaison Plan (App Do Reg 7.8) [<b>REP6-096</b>].</p>
		Noting that the Applicant intends to submit a revised Construction Traffic Management Plan at Deadline 6, whether	2.4.2	The Applicant took an action to review the wording in the TA, ES and CTMP to provide clarity on the construction vehicles to be included in this requirement.

		measures described in ES Chapter 19 (e.g. at paragraph 2.8.21, first bullet point) address concerns raised by IPs in relation to vehicle movement times		
		Regarding the aforementioned text and on the basis that not all vehicles would be making deliveries, whether it would it be clearer if a requirement that no construction deliveries (including site won material) was changed to a requirement that no construction deliveries vehicle movements (including site won material)	2.4.3	<p>The Applicant was asked whether it would it be clearer if the requirement in the CTMP that no construction deliveries (including site won material) was changed to a requirement that no construction vehicle movements (including site won material).</p> <p>The Applicant noted the point and would provide revised wording in the TA, ES and CTMP documents to provide clarity on the construction vehicles to be included in this requirement.</p>
		Noting that operational phase effects are reported as not significant as per paragraph 4.3.31 of ES Chapter 19, whether mitigation (as set out in the Operational Logistics Traffic Plan) is still required, and if so, how a requirement in this regard is justified	2.4.4	<p>The Applicant responded to this above to confirm that it would honour the commitments already made in the OLTP, notwithstanding the change in assessment.</p>

2(e)	2.5	Observations on the Additional Submissions	2.5.1	This was not addressed to the Applicant.
		Whether IPs are confident that the magnitude of impacts are robust and can be relied upon.	2.5.2	This was not addressed to the Applicant.
2(f) Policy Considerations	2.6	<p>To what extent the Proposed Development complies with:</p> <ul style="list-style-type: none"> <li>o National Policy Statement for Waste Water (Applicant's position set out in Table 1-2 of ES Chapter 19) paragraphs 4.13.2 (sustainable development), 4.13.3 (methodology), 4.13.4 (improving access by public transport) walking and cycling, to reduce the need for parking) and 4.13.6 (acceptability of impacts).</li> <li>o The National Planning Policy Framework (December 2023), particularly paragraphs 109, 114 and 116.</li> <li>o South Cambridgeshire Local Plan Policies TI/2, TI/3 and TI/8.</li> <li>o Cambridge Local Plan</li> </ul>	2.6.1	<p><u>National Policy Statement for Waste Water (Applicant's position set out in Table 1-2 of ES Chapter 19) paragraphs 4.13.2 (sustainable development), 4.13.3 (methodology) 4.13.4 (improving access by public transport) walking and cycling, to reduce the need for parking) and 4.13.6 (acceptability of impacts).</u></p> <p><u>The National Planning Policy Framework (December 2023), particularly paragraphs 109, 114 and 116.</u></p> <p>The ExA asked if the methodology for transport assessment has been followed. The Applicant referred to the Planning Statement and Section 4 which deals with the application in the context of all sections of the NPSWW. The Applicant also referred to the NPSWW Accordance Table (App Doc Reg 7.5.1) <b>[REP1-051]</b> which also addresses the NPSWW by paragraph. In relation to the policy context for the development of nationally significant waste water infrastructure as set out at NPSWW section 2.2, no specific reference is made to location or reducing the need for travel although the NPS does refer to waste water infrastructure in both 'mature urban environments' (paragraph 1.4.4) and outside urban centres (paragraph 2.4.14).</p> <p>At the detail in NPSWW paragraph 4.13, NPSWW paragraph 4.13.1. identifies that the transport of materials, goods and personnel to and from a development during all project phases is recognised as potentially having a variety of impacts and paragraph 4.13.6 goes as far to say 'substantial impacts', for example due to increased congestion. The Applicant stated</p>

		<p>Policies 5 and 81. o The draft Greater Cambridge Local Plan. o Cambridgeshire and Peterborough Minerals and Waste Local Plan Policies 18 and 23.</p>	<p>that at NPSWW paragraph 4.13.2, the consideration and mitigation of transport impacts is expressed as “<i>an essential part of Government’s wider policy objectives for sustainable development</i>”. The ExA therefore needs to ensure that the Applicant has sought to mitigate this. However, NPSWW paragraph 4.13.7 makes clear that provided that the Applicant is willing to enter into planning or transport obligations or requirements can be used to mitigate transport impacts, then development consent should not be withheld, and appropriately limited weight should be applied to residual effects on the surrounding transport infrastructure.</p> <p>In summary, the requirements of paragraph 4.13 have been dealt with, including with the latest information which has been submitted in support of the application.</p> <p>NPSWW paragraphs 4.13.3-5 cover the assessment and consultation expected to support applications, including TA and the preparation of a travel plan which should include demand management measures to mitigate transport impacts and “<i>details of proposed measures to improve access by public transport, walking and cycling to reduce the need for parking associated with the proposal</i>” (NPSWW paragraph 4.13.4). The Applicant confirmed that all of these matters are addressed in the application documents and offered management and travel plans (subject to updating and submission at Deadline 7).</p> <p>Referencing the absence to sustainable transport in NPSWW, the ExA asked if the reference to ‘sustainable development’ had any bearing on ‘sustainable transport’. The Applicant said that in the context of infrastructure projects, the objective of achieving sustainable development may be different to that in the NPPF, for example at NPPF paragraph 109. There, specific reference is made to the need to reduce travel. That expression is not used in the NPSWW in relation to infrastructure, no doubt reflecting that the specific requirements for locating infrastructure are different and distinct from those for housing or offices.</p>
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			<p>The ExA said that the public transport services to the new WWTP are not as good as to the existing WWTP and how that sits in the context of government policy on sustainable development. The Applicant said the application is a specific form of national infrastructure which relies primarily on import and export by pipeline and in which context transport movements (HGVs, staff and visitors) are relatively minor in the context of the overall activity. That activity in this instance is largely a displacement of existing traffic on the local road network. It is, of course, appropriate that the effects of this should be properly assessed and that has been done in the ES and TA.</p> <p>The Applicant noted that the rationale for the Proposed Development is to enable land to be vacated for other sustainable development which is of regional and national significance and which contributes to the Greater Cambridge economic objectives.</p> <p>The ExA asked if taking the proposed WWTP on its own, whether it is in a more or less sustainable location than the existing WWTP?</p> <p>The Applicant stated that the definition of sustainable location does not relate solely to its transport accessibility. On a broad interpretation of sustainability, the new location for the WWTP is more sustainable. This reflects the constraints on the existing operation at North East Cambridge, the absence of those constraints at the proposed WWTP site and the ability of the new facility to serve needs indefinitely into the future. That cannot necessarily be achieved at the existing WWTP. Examples of existing constraints are the safeguarding zone around the existing WWPT and the effective blight that causes in terms of the opportunity for economic development; the existing impacts on residents who live within the vicinity of the existing WWTP and the sterilisation of a considerable area of land, a proportion of which is not usable for any other purpose.</p>
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			<p>The Applicant stated that these constraints prevent full and effective use of brownfield land in an urban area, a constraint which would be removed by the new WWTP being granted consent. These constraints on the existing site include the difficulties it will face in being able to expand in the emerging Local Plan period. No such constraint will apply at the new WWTP.</p> <p>The Applicant explained that it has approached its assessment of sustainability from the broadest sense: what is most sustainable in terms of development for Greater Cambridge in the future? There are aspects of sustainability where the new WWTP performs better than the existing WWTP. This includes the actual construction of the facility which will deliver a new, modern waste water treatment plant. The existing WWTP is constrained by its history and is constrained in so far as it is works which have been in existence for over 100 years. It has been modernised over a period of time but this has been constrained by the fact that it is an operational site and needs to be modernised whilst this process is ongoing. The new facility will achieve improvement in water treatment terms but will also deliver flexibility and the ability to expand by the addition of modules for a new generation. That is much more difficult to achieve at the existing WWTP.</p> <p>The ExA asked if the NPPF was important and relevant in the context of the application. The Applicant said the degree of importance and relevance depends upon whether the application is determined under Section 104 or 105 of the Planning Act 2008. If determined under Section 104, the importance of the NPPF is diminished, although it may still be important and relevant. The Applicant has looked at the extent to which the application and the material supplied with the application is consistent and meets the requirements in the NPPF and the Applicant believes the application is in compliance with 109, 114 and 116.</p> <p>The Applicant said it did not believe that there were any parts of the application which do not meet the objectives of those</p>
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			<p>paragraphs. As to paragraph 109, even if the location is not considered to be as sustainable as the existing WWTP in accessibility terms, the Applicant has focussed on methods to make it more sustainable (as required by NPPF paragraph 109), such as by ensuring the availability of alternative means of travel to and from the site rather than by car. NPPF paragraph 109 acknowledges that opportunities to maximise sustainable transport solutions will vary depending upon the location.</p> <p>In response to comments from Interested Parties, the Applicant explained that it has considered sustainability in the broadest sense. Although it appreciates this hearing session is focussed on transport, transport is only one aspect of the consideration of overall sustainability noting the definition of sustainable development at paragraph 8 in the NPPF. The Applicant acknowledges that the new WWTP may not be as well served by public transport as the existing WWTP site but that is only one factor in the overall assessment of the sustainability of the Proposed Development. Assessment of the Proposed Development as a whole must consider all contributions that the project will make to achieving the three-overarching economic, social and environmental objectives set out at NPPF paragraph 8 taking into account (for instance) whether it is:</p> <ul style="list-style-type: none"> <li>• helping to build a strong, responsive and competitive economy;</li> <li>• ensuring that the right type of land is available in the right places;</li> <li>• ensuring that the range of homes being provided can meet present and future needs;</li> <li>• protecting and enhancing the historic and built environment.</li> </ul>
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			2.6.2	<p><u>o South Cambridgeshire Local Plan Policies TI/2, TI/3 and TI/8.</u></p> <p>The Applicant confirmed it agreed that this agenda item lists all those relevant policies which relate to transport. These policies are split between those seeking to reduce the need to travel and those policies which are development management focused. The Applicant explained that through the inclusion of measures such as the CoCP, the CTMP and the OWTP, the Proposed Development ensures that the opportunity to utilise modes of transport other than the car are available at the new WWTP.</p> <p>Taking each criterion in turn, criterion 1 of TI/2 reads as follows:</p>
				<p><i>Development must be located and designed to reduce the need to travel, particularly by car, and promote sustainable travel appropriate to its location.</i></p> <p>The Applicant acknowledged that there is an element of conflict in the first part of Policy TI/2 in reducing the need to travel but that the application does incorporate measures to support sustainable travel opportunities. The Applicant referred to the opportunity for urban regeneration which may be facilitated at the existing WWTP site if this DCO application is granted. Realisation of that opportunity would clearly deliver the outcome sought by Policy TI/2. How one should interpret compliance with Policy TI/2 therefore will vary depending on the circumstances. The ExA asked how this was possible if the proposals for the freeing up of existing WWTP are not included in this application. The Applicant referred to its previous responses on this matter, for example to ExQ1-1.18, ExQ1-2.15 and ExQ1-2.31 [REP1-079].</p> <p>Moving on to the second part of Policy TI/2 it goes into specifics around components which need to be addressed. The Applicant stated that the proposed development meets the criteria. The Applicant pointed out that the policy is designed to deal with a range of different developments and not necessarily</p>

			<p>infrastructure of this nature, for example, when it references neighbourhoods.</p> <p><i>a. Provision of safe, direct routes within permeable layouts that facilitate and encourage short distance trips by walking and cycling between home and nearby centres of attraction, and to bus stops or railway stations, to provide real travel choice for some or all of the journey, in accordance with Policy HQ/1;</i></p> <p>The Applicant confirmed that provision of safe direct routes is being made.</p> <p><i>b. Provision of new cycle and walking routes that connect to existing networks, including the wider Rights of Way network, to strengthen connections between villages, Northstowe, Cambridge, market towns, and the wider countryside;</i></p> <p>As to 2(b), the provision of new cycling and walking routes and making connections, this is a component of the application.</p> <p><i>c. Protection and improvement of existing cycle and walking routes, including the Rights of Way network, to ensure the effectiveness and amenity of these routes is maintained, including through maintenance, crossings, signposting and waymarking, and, where appropriate, widening and lighting;</i></p> <p>The Applicant acknowledged temporary disruption during construction but in operation there will be an enhancement to the existing cycle and walking routes, including the Rights of Way network.</p> <p><i>d. Provision of secure, accessible and convenient cycle parking in accordance with Policy TI/3;</i></p> <p>The Applicant confirmed it had addressed Policy TI/3 which relates to parking in its response to ISH4 Action Point 4 [REP6-116], but the Applicant confirmed that cycle parking is being provided as part of the new WWTP. This will be secure parking.</p>
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			<p>The visitor parking has a natural surveillance as it is overlooked by the Gateway Building reception.</p> <p><i>e. Securing appropriate improvements to public and community transport (including infrastructure requirements) in accordance with the aims of the Cambridgeshire Local Transport Plan and South Cambridgeshire Community Transport Strategy.</i></p> <p>The Applicant confirmed that there are provisions in the OWTP (as being updated for Deadline 7) to achieve the targets in terms of modal split and there are opportunities to seek to improve other means by which people access the site if those targets are not going to be achieved.</p> <p>The ExA asked if bus contributions and similar were more relevant to this point. The Applicant agreed. The Applicant said that in the OWTP it would be a normal part of the regular review process to consider appropriate additional measures which may be necessary to assist in achieving the objectives set in the OWTP.</p> <p><i>3. Developers will be required to demonstrate they will make adequate provision to mitigate the likely impacts (including cumulative impacts) of their proposal including environmental impacts (such as noise and pollution) and impact on amenity and health. This will be achieved through direct improvements and Section 106 contributions and/or the Community Infrastructure Levy (CIL), to address transport infrastructure in the wider area including across the district boundary</i></p> <p>The Applicant confirmed that there are transport-related measures secured in the s106 Agreement, but these relate to the control of nuisance parking and contribution to equestrian use only, not to public transport or community services for the reasons addressed earlier in this hearing session.</p> <p><i>4. Developers of 'larger developments' or where a proposal is likely to have 'significant transport implications' will be required to demonstrate they have maximised opportunities for sustainable travel and will make adequate provision to mitigate</i></p>
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			<p><i>the likely impacts through provision of a Transport Assessment and Travel Plan. All other developments will be required to submit a Transport Statement. Where a Transport Assessment / Statement or Travel Plan is required, a Low Emissions Strategy Statement should be integrated.</i></p> <p>Point 4 talks about significant transport implications. The ExA asked if this point falls away as the proposed development will not have significant transport implications. The Applicant confirmed it does fall away.</p> <p><i>5. Travel Plans must have measurable outputs, be related to the aims and objectives in the Local Transport Plan and provide monitoring and enforcement arrangements. Planning obligations may be an appropriate means of securing the provision of some or all of a Travel Plan, including the requirement for an annual monitoring and progress report. Submission of area-wide Travel Plans will be considered in appropriate situations. Outline planning applications are required to submit a framework for the preparation of a Travel Plan.</i></p> <p>As to point 5, the Applicant said the most effective travel plans are those which have clearly defined targets which can be measured, and which progress can be monitored against. In approving an OWTP, this can be dealt with through that process but ideally the OWTP should include clear targets. These should in this instance recognise that there are peculiarities about the types of operation and the need for workers to come to site irregularly but this can be properly considered as part of the OWTP.</p> <p>The Applicant noted that part of this policy is focused on a scale and type of development which is more typical of the workload of a local planning authority, such as a residential or employment scheme and not necessarily infrastructure of this nature. The Proposed Development is large because of its area and the amount of plant and processes which need to take place but in terms of employment generation and trip generation, it</p>
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			<p>is relatively small. One hectare would represent a substantial office scheme but a judgment needs to be made here about how that element of the policy should be applied here.</p> <p><u>Policy TI/3</u></p> <p>The Applicant said it wanted to make one point which it made in Action Point 4 of the Applicant's Responses to ISH4 Actions <b>[REP6-117]</b>. The parking standards are indicative standards and are difficult to apply in these circumstances. They are broken down into different use classes and WWTP use is not clearly defined in a particular Use Class. One could apply the standards differently depending upon how the actual use of the space is defined.</p> <p><u>Policy TI/8</u></p> <p>The ExA asked if other contributions were needed to mitigate the development in transport terms. The Applicant said that the draft section 106 agreement has provisions to deal with a situation where nuisance parking occurs and that is a response to a concern that if people were coming to Low Fen Drove Way for a walk but were driving there and nuisance parking caused problems to the highway network, that is the only matter covered in that context.</p> <p>The ExA said it understands there to be an anti-social behaviour Section 106 agreement. The Applicant explained that it was no longer offering this. It was only offered in the context of the proposal for the PRoW to be secured as a permissive path. The landowner wanted a mechanism in which he could trigger the removal of that permissive right in the event of the occurrence of anti-social behaviour. The new PRoW is now being secured by dedication under a requirement of the dDCO which includes measures to avoid the risk of anti-social behaviour. The risk of anti-social behaviour is not considered to be over and above any risk that exists on any public right of way.</p> <p>As to the Equestrian Measures, the ExA noted that this previously only referred to signage. The Applicant explained</p>
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			<p>that there were discussions over a number of different ways in which the needs of equestrians could be met. The agreement reached with the County Council is towards general measures to assist in equestrian use.</p> <p>The ExA asked if it can be changed from signage to a general measure, how can it be said that it is necessary. The Applicant explained that when discussions were had initially, it was not clear who was delivering what. As the Horningsea Greenway works have developed, it can be seen that mounting blocks have been provided and it became clear that the Applicant could assist and contribute to related measures.</p> <p>The ExA said it understood that the Applicant has facilitated the crossing of the A14 overbridge by mounted horse riders by increasing the parapet height. The ExA said it wanted an Action Point with regards to why the anti-social behaviour section 106 agreement has been removed and why the Equestrian Measures contribution is justified when it was changed from Equestrian Signage.</p> <p>The Applicant was asked to confirm in a written response:</p> <ul style="list-style-type: none"> <li>- why the anti-social behaviour Section 106 agreement has been withdrawn;</li> <li>- why the parapet height is secured in the DCO; and</li> <li>- why the equestrian contribution changed from 'Signage' to 'Measures'</li> <li>-</li> </ul> <p><b>[Post-Hearing Note:</b> The Applicant has responded to this matter as part of the response to Q13 in the Applicant's Response to Rule 17 Request for Further Information (App Doc Ref 8.30) provided at Deadline 7.]</p> <p>At point 4 of the agenda, the ExA returned to this issue and pointed out that the Section 106 concerned the County Council and the new WWTP but the explanation given refers to the landowner. The Applicant explained that as a PROW, the</p>
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			<p>general powers the County Council has in its capacity as highway authority addressed the concerns of the landowner.</p> <p>The Applicant explained that the inclusion of a plan for the existing WWTP was to secure the terms of the Section 106 agreement until such time as the new WWTP can be bound under the Section 106 agreement. There was never any intention to assess anti-social behaviour with regards to the existing WWTP.</p>
		<p>2.6.3</p>	<p><u>Cambridge Local Plan Policies 5 and 81.</u></p> <p>The Applicant explained that the plans referred to in Policy 5 are focused on the need to reduce the need to use private cars and therefore reduce pressure on the roads and the encouragement to other more sustainable forms of transport. The Applicant described Policy 5 as akin to SCLP Policy TI/2. The Applicant would question the relevance of the criteria in the policy to this specific scheme but the Applicant proposed to run through them:</p> <p><i>a. delivery of local and strategic transport schemes, subject to the outcome of up-to-date, detailed assessments and consultation, where appropriate;</i></p> <ul style="list-style-type: none"> <li>- The Applicant said that the scheme was not a local strategic transport scheme and therefore this was not relevant.</li> </ul> <p><i>b. promoting greater pedestrian and cycle priority through and to the city centre, district centres and potentially incorporating public realm and cycle parking improvements;</i></p> <ul style="list-style-type: none"> <li>- the Applicant stated that the scheme provides cycle parking and open space and direct connection to the city centre via the Horningsea Greenway.</li> </ul>

			<p><i>c. promoting sustainable transport and access for all to and from major employers, education and research clusters, hospitals, schools and colleges;</i></p> <p><i>d. working with partners in supporting the TSCSC's aim for a joined-up, city-wide cycle and pedestrian network by addressing 'pinch-points', barriers and missing links;</i></p> <p><i>e. linking growth to the proposed city-wide 20 mph zone; and</i></p> <p><i>f. easing pressure on the air quality management area (AQMA) in the city centre.</i></p> <p>The ExA asked if the part of the development within the boundary of Cambridge City Council is a transport generating development. The Applicant said the only component which relates to that is decommissioning so the application of the policy is narrow.</p> <p>The ExA asked if it could be summarised as having the strategic aim of the SCDC policy but many of the points are not applicable because the traffic generating part of the development is not within the City Council's area. The Applicant agreed.</p> <p><u>Policy 81</u></p> <p><i>Developments will only be permitted where they do not have an unacceptable transport impact. Therefore, new development will require: a. sufficient information to be supplied with all development proposals that the transport impact can be suitably assessed. This should take the form of transport assessments for schemes above the thresholds set in the latest Cambridgeshire County Council guidance; b. a travel plan to accompany all major development proposals; and c. reasonable and proportionate financial contributions/mitigation measures where necessary to make the transport impact of the development acceptable. This could include investment in infrastructure, services or behavioural change measures to encourage the use of sustainable modes of transport. Such</i></p>
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			<p><i>measures should be provided to meet the first or early occupation of a site in order to influence travel behaviour from the outset</i></p> <p>The ExA pointed out that this refers to the mitigation of large developments and was similar in intent to the policies reviewed already. The Applicant agreed.</p>
		2.6.4	<p><u>The draft Greater Cambridge Local Plan.</u></p> <p>The Applicant said that the only policy which is relevant is draft policy I/ST which continues in similar intent to SCLP Policy TI/2 and CLP Policy 5.</p>

			2.6.5	<p><u>Cambridgeshire and Peterborough Minerals and Waste Local Plan Policies 18 and 23</u></p> <p>The Applicant was asked for its views on Policy 23. The Applicant said it considers that the application proposals comply with Policy 23. The policy has a series of criterion which need to be satisfied. The policy says minerals and waste development will 'only be permitted if' and then turns to a series of points:</p> <p><i>(a) appropriate opportunities to promote sustainable transport modes can be, or have been, taken up, to the degree reasonably available given the type of development and its location. If, at the point of application, commercially available electric Heavy Commercial Vehicles (HCVs) are reasonably available, then development which would increase HCV movements should provide appropriate electric vehicle charging infrastructure for HCVs;</i></p> <ul style="list-style-type: none"> <li>- the Applicant stated that the scheme does promote sustainable transport modes through the OWTP and through the alternative means by which the site can be accessed. The Applicant also referred to the efforts the Applicant is making to decarbonise its fleet of vehicles</li> </ul> <p><i>(b) safe and suitable access to the site can be achieved for all users of the subsequent development;</i></p> <ul style="list-style-type: none"> <li>- the Applicant said that lorry routing arrangements had been covered in previous hearing sessions and it considered that the Proposed Development is in compliance. The ExA referred to AIL during operation and there are no restrictions during operation but the ExA has set this as an action point.</li> </ul> <p><i>(c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree;</i></p>
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				<p><i>(d) any associated increase in traffic or highway improvements would not cause unacceptable harm to the environment, road safety or residential amenity, and would not cause severe residual cumulative impacts on the road network; and</i></p> <p><i>(e) binding agreements covering lorry routing arrangements and/or HCV signage for mineral and waste traffic are agreed, if any such agreements are necessary and reasonable to make a development acceptable</i></p> <p>In response to points raised by Charles Jones about the CTMP and signage in conjunction with geofencing, the Applicant confirmed it was happy to take the point away.</p> <p>In response to SHH, the Applicant confirmed that reference to AW vehicles was in order to be more about the sludge tanker movements and its requirement for its drivers to work within the geofence limits. Given the location, some septic tankers will be required to visit people within the geo-fenced area but the Applicant can look again at the wording.</p>
2(g) Arrangements for submitting comments on the Applicant's recent Additional Submissions				<p>In response to comments from National Highways and in particular an opinion from King's Counsel and the new technical note, the Applicant said it would need to respond by Deadline 8. The Applicant asked that the technical note is sent this afternoon and the new KC opinion as soon as it arrived.</p>

4 Any other matters	4.1	The ExA invited comments from those attending the hearing.	4.1.1	<p>In response to comments from Charles Jones, the Applicant confirmed it was intentional that the hedgerows which straddle the boundary are on the plan so that it can be seen which proportion of the hedge is proposed to be taken in each instance.</p> <p>The Applicant was invited to comment on the Rule 17 letter if desired. The Applicant confirmed it will answer in writing at Deadline 7.</p> <p>The ExA asked that all changes to the DCO noted at Deadline 6 are made in the DCO submitted at Deadline 7. The Applicant confirmed that they would be.</p>
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## Get in touch

You can contact us by:



Emailing at [info@cwwtpr.com](mailto:info@cwwtpr.com)



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



Writing to us at **Freepost: CWWTPR**

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