

Cambridge Waste Water Treatment Plant Relocation Project  
Anglian Water Services Limited

# Applicant's Comments on Deadline 6 Submissions

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# 1 Introduction

## 1.1 Introduction

This document provides Anglian Water Services Limited (the Applicant) comments on the submissions received at Deadline 6 for the Cambridge Waste Water Treatment Plant Relocation Project (CWWTPRP).

This document does not seek to respond to every submission made at Deadline 6 (2<sup>nd</sup> April 2024) or to repeat matters which are already set out in documents available to the examination – rather its purpose is to address any new concerns which may have arisen, correct any omissions or provide signposting of clarification were deemed necessary.

The Applicant has reviewed the submissions from the following parties and believes that there is either no response required from the Applicant or the Applicant has already addressed the points raised in its Deadline 6 submissions, at Issue Specific Hearing 4 and in its response to the ExA Action Points and ExQ3s:

- Nation Trust - Procedural Deadline 6 Submission: Responses to Third Written Questions (ExQ3) [**REP6-130**];
- Save Honey Hill – ISH4- SHH Written Summary of Oral Submissions SHH62 [**REP6-137**];
- Save Honey Hill – Responses to Deadline 5 submissions (with the exception of SHH61) [**REP6-135**];
- Cambridgeshire County Council – Written Oral Summaries [**REP6-120**];
- Natural England – Response to the Examining Authority's third written questions [**REP6-131**];
- Cambridge City Council – Written Oral Summaries [**REP6-126**];
- Cambridge City Council – Responses to ExQ3s [**REP6-125**];
- South Cambridgeshire District Council – Response to the Examining Authority's third written questions [**REP6-122**];
- South Cambridgeshire District Council - Written summary of oral submissions made at Issue Specific Hearing 4 (ISH 4) and responses to the Action Points raised [**REP6-123**];
- Environment Agency - Examining Authority's Written Questions And Requests For Information (EXQ3) [**REP6-128**];
- Liz Cotton – Written summary of my oral submission at hearings on 13 and 14 March (ISH4) [**AS-200**]; and
- Andrew Whitaker – Comments/updates on Traffic and Transport related matters [**AS-201**].

## Applicants comments on submissions received from Save Honey Hill at Deadline 6 [REP6-134 & 135]

### 1.2 SHH64 Response to Applicant's Revised Traffic and Transport Submissions [REP6-134]

The points raised in Section 4 of the SHH64 are copied below in bold text, with the Applicant's response to each underneath.

**Page 19. Assessment Years should refer to 2027 as Year 4 Construction.**

Decommissioning is expected to commence in June 2027 and finish in early 2028. In the construction programme for the Proposed Development, Construction Year 4 is assumed to span the second half of 2027 and the first half of 2028. For the purposes of the traffic and transport assessments, Construction Year 4 is assumed to be 2028. Therefore, ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) [REP6-037] correctly refers to Decommissioning activities happening in Construction Year 4. The Applicant has clarified the wording of paragraph 4.4.2 in the updated version of ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) provided at Deadline 7.

**Page 21. Construction deliveries. We believe this is still slightly incorrect and could be more clearly worded. Our understanding at ISH4 was that the 0930 to 1500 Monday to Friday restriction on construction vehicles on Station Road and Clayhithe Road is to apply both within and outside school terms, to reflect the narrow footways and volumes of pedestrian activity, related principally to the railway station. This text is then used at various points in Chapter 19 eg para 2.8.21 and will need amending throughout the document.**

This has been considered as part of Action Point 10 from the Action Points from ISH5 [EV-009b]. In the versions of ES Appendix 19.7 Construction Traffic Management Plan (App Doc Ref 5.4.19.7), ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) and ES Appendix 19.3 Transport Assessment (App Doc Ref 5.4.19.3) provided at Deadline 7, references to 'construction deliveries' have been amended to read 'construction vehicles over 3.5 tonnes (including vehicles transporting site won material)'.

The time restriction for Clayhithe Road and Station Road has not been amended to remove the outside school times reference. The time restrictions on the use of construction access routes in Waterbeach was agreed with the highway authority and the Applicant considers that it remains appropriate.

It is noted that the approved CTMP will be subject to agreement with highway and planning authorities, as set out in Section 2, paragraph 2.1.3 of ES Appendix 19.7 Construction Traffic Management Plan (App Doc Ref 5.4.19.7) to finalise the detailed measures.

**Page 32. Para 1.1.3 notes the use of the traffic assessment data in other chapters of the ES. Have those assessments been checked against Chapter 19 Rev 06 and the TA and amended where necessary?**

This is dealt with by Action Point 1 from the Action Points from ISH5 [EV-009b] and the provision of a supplementary Review Note (App Doc Ref 5.4.19.14) provided at Deadline 7.

**Page 62. Para 2.4.5 and Table 2-6. In line with the Independent Review, it should be made clear which version of TEMPro has been used and could state the comparison with the TEMPro 8.1 assumptions.**

The Applicant confirms that the traffic growth factors reported in ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) and ES Appendix 19.3 Transport Assessment (App Doc Ref 5.4.19.3) are based on version 7.2 of TEMPro. This has been clarified in the updated version of ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) provided at Deadline 7.

A comparison of TEMPro 7.2 growth factors to TEMPro version 8.1 growth factors is provided in Section 3, paragraph 3.5 and Figure 3.1 in the Independent Review Report (App Doc Ref 8.26) [AS-199].

**Page 64. Paras 2.4.10 to Table 2-8. This does not appear to have been fully updated to reflect the decision to only assess Operation in Year 1+10.**

Paragraph 2.4.10 has been amended to remove all references to Operation Year 1 + 5 (2033) in the version of ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) provided at Deadline 7.

**Page 185. Table 4-37 et seq. References to Low Fen Drove Way in the tables and succeeding text, e.g. Table 4-47 and para 4.2.188, contain data which appears wrong. Although not material to the findings of the overall assessment, it is surprising that there are any changes to vehicle movements on LFDW recorded for Construction Year 3 and there certainly are not 17 HGV movements in both peak hours as noted in Table 4-37.**

Low Fen Drove Way will be used by construction traffic during construction of the permanent access to the proposed WWTP. The data for Low Fen Drove Way is included in Table 4-37 of the ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) and subsequent tables reflects the level of construction vehicle activity that would be expected to occur on Low Fen Drove Way during this initial period.

**Page 218. Para 4.2.252. Reference to Junction 33 incorrect.**

Paragraph 4.2.255 (previously paragraph 4.2.252) has been amended to refer to Station Road / Clayhithe Road, as set out in Table 4-62, in the updated version of ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) provided at Deadline 7.

**Page 242. Para 4.3.20. This appears to be the first reference in the Chapter to the intended secondary mitigation for operation. This notes that Section 5 of the OLTP will include 'Application of a peak delivery period restrictions on operational vehicles, if required, to manage impacts on the local junction. Peak hour restrictions would be 08:00-09:00, 15:00-16:00, and 17:00-18:00, unless it is determined to be essential that the delivery is to be completed during peak hours or specific alternative restrictions are agreed with the local highway authority.' We note that this steps back from the previous position that HGV movements during operation will be restricted to outside peak hours, based on the revised**

**traffic assessments. Our concern about this statement is, however, that it is unclear in several respects:**

**(i) Are 'operational vehicles' meant to include all LGVs and HGVs entering and leaving the works? The terms 'operational' and 'delivery' both appear in the quoted text.**

**(ii) What monitoring will be undertaken and what triggers will determine if a restriction is 'required'? Who will agree that restriction? We recognise the difficulty in addressing this, given that future background traffic flows will not necessarily conform to the TEMPro based projections in the ES and that other restrictions or changes to the road network, for example, further traffic management measures in Fen Ditton independent of this scheme, may both affect the future operation of J34.**

**(iii) The text refers to 'the local junction'. Is this meant to be J34 or to be both J33 and J34.**

**These are points which may be addressed in the updated OLTP to be submitted at D6, but we suspect they are not.**

**We note, also, as set out in the second bullet, that geofencing and routeing restrictions through Horningsea and Fen Ditton will now only apply to 'Anglian Water HGVs'. This is a point that SHH has previously questioned and if restrictions only apply to AW vehicles, 3rd party contractors hauling septic tank waste who are not contracted to AW and possibly some sludge deliveries will be excluded. Given that around half of all HGVs visiting the works are septic tank waste vehicles, this is a substantial weakening of the restrictions previously offered by the Applicant. Can the Applicant please clarify that this is the intended position?**

**These statements about restrictions are also repeated in para 4.3.37, although the Horningsea and Fen Ditton restriction is worded differently.**

The analysis set out in ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) and ES Appendix 19.3 Transport Assessment (App Doc Ref 5.4.19.3) demonstrates that there are no significant impacts at Junction 34 in the Operation phase in 2038. Therefore, as noted during Issue Specific Hearing 5, the Applicant considers that the mitigation measures included in ES Appendix 19.10 Operational Logistics Traffic Plan (App Doc Ref 5.4.19.10) are no longer necessary. However, the Applicant is willing to retain the mitigation measures, including a potential restriction on operational vehicles, on a precautionary basis to provide assurance that such measures could be introduced in the future if required.

Operational vehicles refers to the HGVs and this has been clarified in paragraph 4.3.20 of ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19).

The mechanism for monitoring the performance of Junction 34 of the A14 and an appropriate trigger for the introduction of peak hour restrictions on operational vehicle movements associated with the proposed WWTP will be agreed with Cambridgeshire County Council (CCoC) as part of the approved OLTP, as set out in section 8 of ES Appendix 19.10 Operational Logistics Traffic Plan (App Doc Ref 5.4.19.10).

The reference to 'local junction' in paragraph 4.2.20 of ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) has been amended to refer to Junction 34 of the A14.

**Page 251 Para 4.3.41. Final bullet. We note that there is already an 'uninterrupted' connection on the west side of Horningsea Road, albeit that the Applicant proposes to slightly widen it. The reference to 'Biggins Lane' is incorrect and should say Biggin Abbey Drive or Low Fen Drove Way.**

The reference to 'Biggins Lane' in paragraph 4.2.20 of ES Chapter 19 Traffic and Transport (App Doc Ref 5.2.19) provided at Deadline 7 has been amend to 'Biggin Lane'. The reference to 'uninterrupted' has been amended to 'improved' to reference the upgrades to the walking/cycling route implemented as part of the Proposed Development.

### **SHH61 Comments on Responses to ExA Second Written Questions (ExQ2) by Applicant, County Council and SCDC [REP6-135]**

Save Honey Hill state on page 3 of their document [REP6-135] that the relevance of the Government's Vision for Cambridge to the Examination of the PD is that the proposed developments at North East Cambridge in the GCLP are not singled out over and above any of the strategic sites in the GCLP FP for 'acceleration'. Whilst the North East Cambridge development is not 'singled out' in the Case for Cambridge, it is identified as one of three strategic sites, as set out in the Applicant's response to EXQ3 1.5 [REP6-117] for the Cambridge Delivery Group to seek to accelerate and unlock for development.



## 2 Applicants comments on submissions received from Quy Fen Trust at Deadline 6 [REP6-132]

### Quy Fen Trust S106 inclusion request

The Applicant has submitted a draft Section 106 Agreement which commits to a financial contribution of £30,000 to support the establishment of the Combined Recreational Group, its terms of reference, membership and enabling activities to establish a baseline from which future cumulative impacts on the Quy Fen SSSI and management measures can be considered. This could lead, ultimately, to the adoption if necessary, of a suitable monitoring, management and mitigation strategy funded through developer contributions and other sources. A further contribution of £5,000 is being provided to the Trust towards signage and education measures to mitigate recreational impacts on the SSSI pending the agreement on the longer-term monitoring, management and mitigation strategy. See paragraph 4.1 of 8.28 Applicant's Post Hearing Submissions (ISH4) at REP6-118. Considering the above the Applicant cannot therefore accede to the Trust's request for additional funding for a website or other online measures.

## 3 Applicants comments on submissions received from Fen Ditton Parish Council at Deadline 6 [REP6-127]

### 3.1 Drainage Strategy

Figure 4.1 and Table 4-1 and the higher resolution plan provided in Section 8 of the Drainage Strategy (App Doc Ref 5.4.20.12 [REP6-090]) show that all areas where there is the potential for contamination are on a sealed system (Purple and Green) which returns to the head of the works. Both sections 3.2 and Section 4 state that areas of hard surfaces where there is a risk of oil pollution will also include oil interceptors.

The provision of sealed systems on all areas where potential contamination has been identified, infiltration, interceptors and SuDs is considered more than adequate to address potential contamination concerns from 'clean water' areas. The Applicant would also like to draw attention to the fact that the Drainage Strategy is an outline document, subject to further detailed design. As set out at Section 4.8 a risk assessment will be carried out as part of the detailed design. This will identify and mitigate any risks not already considered in the design. This detailed design, as per Requirement 15, requires approval by the relevant planning authority and therefore Cambridgeshire County Council would be required to review and approve the detailed design during the Discharge of Requirements.

Based on the above information the Applicant does not believe that the Drainage Strategy requires updating to include any further measures at this time.

## 4 Applicants comments on submissions received from Chris Smith at Deadline 6 [REP6-138]

### 4.1 Representations by Chris Smith on submissions received at D5 ID56385

The Applicant thanks Mr Smith for the comments provided [REP6-138] on the Applicant's submission made at Deadline 5 in relation to bats [REP4-098].

The Applicant provided clarification at Deadline 5 [REP4-098] in relation to the number of transects undertaken, along with the rationale for their reporting as three transects (i.e. because of the areas being separated into the existing waste water treatment plant; the outfall area adjacent to the River Cam; and the proposed waste water treatment plant) in previous submissions. The transects undertaken covered the range of habitats present, and were of appropriate lengths, in line with good practice guidance (Collins, 2016) available at the time of survey.

The Applicant has outlined the limitations to surveys where deviations from good practice guidance occurred, within the submission [REP4-098] and provided the approach taken to mitigate these limitations, as part of a precautionary assessment. This approach to outlining limitations and how they are overcome is outlined within Section 2.6 of the Bat Conservation Trust Bat Surveys for Professional Ecologists Good Practice Guidelines (Collins, 2023). The Applicant does not agree with Mr Smith and considers that the assessment that has been made is sufficient and appropriate with respect to bats.

The Applicant acknowledges that the surveys undertaken to date to inform the Environmental Statement are now not "in date". This is not unusual with large infrastructure planning applications that have extended determination timescales. To therefore ensure that up to date bat and other protected species constraints are understood prior to construction commencing, pre-commencement surveys have been proposed and will be carried out in line with the current 2023 survey guidance. This is in line with Section 9.2.4 of the British Standards Publication Biodiversity — Code of practice for planning and development (BS 42020:2013, BSI, 2013). The conditioning of surveys in this circumstance allows for where the original survey work is out of date before commencement of development (survey work relating to bats was undertaken between 2020 and 2022); to incorporate detailed ecological requirements for later phases of developments that might occur over a long period/multiple phases (i.e. in this case to incorporate detailed design and phasing approaches); and to establish the status of a mobile protected species that might have moved, increased or decreased within the site (bats are considered mobile species). Undertaking the surveys will provide accurate information to update the draft ("ghost") bat licence, which was approved by Natural England in light of the survey effort to date, in the final licence submission.

## 5 Applicants comments on submissions received from Helen Santilly at Deadline 6 [REP6-139]

### 5.1 Biodiversity Deadline 6 AW April 2024

The Applicant thanks Ms Santilly for the comments provided in [REP6-139]. The Applicant notes that the vast majority of mitigation measures that Ms Santilly provides for the other planning application are already included in the Applicant's application documents, in particular ES Appendix 2.1 Code of Construction Practice Part A (App Doc Ref 5.4.2.1). Section 7.2 of which includes the requirements for nesting bird checks, sensitive construction lighting, precautionary working methods for reptiles and means of escape for animals stuck overnight in trenches. An Environmental Manager / Ecological Clerk of Works will be present to provide pre-commencement tool-box talks, oversee construction and required mitigation measures.

The Applicant has undertaken a suite of baseline ecological surveys in line with good practice guidance methodologies and approaches, as reported within the ES [REP6-015] and as outlined and justified within the baseline surveys tech note [APP-097]. These were for aquatic species [APP-086], hedgerows [REP6-064], water vole [APP-088], birds [APP-089], reptiles [APP-090], terrestrial invertebrates [APP-091], bats [APP-092], badger [APP-093], otter [APP-094], botany (National Vegetation Classification, NVC) [APP-095], and great crested newt [APP-096].

The Applicant considers that the mitigation measures provided are appropriate for each species or species group present.

## Get in touch

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