

Cambridge Waste Water Treatment Plant Relocation Project
Anglian Water Services Limited

Statement of Common Ground: Natural England

Application Document Reference: 7.14.8
PINS Project Reference: WW010003

Document Control

Document title	Statement of Common Ground between Anglian Water Services Limited and Natural England
Version No.	04 3
Date Approved	
Date 1st Issued	March 2023

Version History

Version	Date	Author	Description of change
01	March 2023	-	DCO Application Issue and format changes
02	November 2023	-	Update following submission of Relevant Representations and finalisation of Ghost Licenses
03	December 2023		Update following review of Final Water Quality Monitoring Plan and Soil Management Plan
<u>04</u>	<u>March 2024</u>		<u>Update to reflect final position at Deadline 6 and resolution of matters raised in letter from Natural England dated 11 March 2024.</u>

Contents

- 1 Introduction.....1
- 1.1 Purpose of this Document.....1
- 1.2 Approach to the SoCG1
- 1.3 Status of the SoCG.....2
- 2 Consultations and Engagement3
- 3 Documents Considered in this SoCG3
- 4 Summary and Status of Agreement4
- 5 Matters Under Discussion **87**
- 6 Agreement on this SoCG9
- Appendix 1.....10
- 6.1 Letter of No Impediment - Bats.....10
- 6.2 Letter of No Impediment - Water Voles.....13
- 6.3 Letter of No Impediment - Badgers17
- Appendix 2.....20

1 Introduction

1.1 Purpose of this Document

- 1.1.1 This Statement of Common Ground (“SoCG”) is submitted as part of an application by Anglian Water Services Limited (“the Applicant”) for a Development Consent Order under the Planning Act 2008 (‘the Application’) for the for the Cambridge Waste Water Treatment Plant (CWWTPR).
- 1.1.2 The Application is for the provision of a new modern, low carbon waste water treatment plant for Greater Cambridge. The project is an enabler of sustainable growth. The relocation of the existing works, from its current site, will unlock the last large brown field site in Greater Cambridge and allow the creation of a new city district and provide much needed housing and commercial space in a sustainable location, with access to transport, jobs and recreational opportunities.
- 1.1.3 This SoCG has been prepared by the Applicant and agreed with Natural England. Natural England is an executive non departmental public body sponsored by the Department for Environment, Food and Rural Affairs (Defra). Natural England is the government’s advisor to protect England’s nature and landscape for people to enjoy and for the services they provide.
- 1.1.4 This SoCG confirms the position of these two parties to their agreement or otherwise on CWWTPR Application. To date, Natural England has provided views on draft proposals at different phases of consultation of the design development.
- 1.1.5 This SoCG has been prepared by the Applicant and agreed with Natural England.

1.2 Approach to the SoCG

- 1.2.1 This SoCG will evolve as the DCO application progresses through examination. It is structured as follows
 - Section 2 confirms the pre-application consultation undertaken to date between the Applicant and Natural England;
 - Section 3 identifies the relevant documents on which the agreements recorded in this SoCG were reached;
 - Section 4 provides a summary of matters that have been agreed, are under discussion and not agreed;

Agreed	indicates where the issue has been resolved and is recorded in Green and marked “ Low ”
Under Discussion	indicates where these issues or points will be the subject of on-going discussion whenever possible to resolve or refine the extent of disagreement between the parties and is recorded in Amber and marked “ medium ”

Not Agreed	indicates a final position and is recorded in Red and marked high
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- Section 5 includes the signatures of all parties to confirm their agreement that this SoCG is an accurate record of issues and discussions as at the date of this SoCG.

1.3 Status of the SoCG

This version, Version ~~42~~ of the SoCG represents the final position between the Applicant and Natural England at 2 April 2024 ~~14 December 2023~~ covering the pre-application, ~~and~~ pre-examination and examination stages of the process. ~~The SoCG will continue to be reviewed and progressed through the examination stages as well as any actions arising from the Issue Specific Hearings on the draft DCO. At this stage Natural England have not provided substantive comments on the draft SoCG.~~

- 1.3.1 A Principal Areas of Disagreement (PAD) document on specific points between SoCG's will be updated and submitted to the Examining Panel during the examination to reflect where additional agreement is still to be achieved.

2 Consultations and Engagement

- 2.1.1 The Applicant has engaged with Natural England in a series of meetings within a Technical Working Group forum and in one-to-one meetings on specific issues. This engagement is ongoing.

3 Documents Considered in this SoCG

- 3.1.1 In reaching common ground on the matters covered in this SoCG, at this point in time, the parties have considered and refer to:
- The Preliminary Environmental Report (“PEIR”),
 - The Landscape Ecology and Recreational Management Plan (LERMP) Appendix 8.14 (App Doc Ref 5.4.8.14)
 - The Biodiversity Chapter of the Environmental Statement (App Doc Ref 5.2.8)
 - The Habitats Regulation Assessment (HRA) Screening Report and Report Appendix 8.15-8.16 (App Doc Ref 5.4.8.15 - 5.4. 8.16)
 - The Hydrological Impact Assessment (HIA) Site Selection Stage Appendix 20.9 (App Doc Ref 5.4.20.9)
 - The Ghost Licences for protected species Appendices 8.20-8.22 (App Doc Ref 5.4.8.20 - 5.4.8.22)
 - Outline Soil Management Plan Appendix 6.3 App Doc Ref 5.4.6.3
 - The DCO Work Plans (App Doc Ref 4.3.0 - 4.3 10)
 - Code of Construction Practice Parts A and B (Appendix 2.1 App Doc Ref 5.4.2.1 and Appendix 2.2 App Doc Ref 5.4.2.2).
 - Outline Water Quality Monitoring Plan(App Doc Ref 5.4.20.13)

4 Summary and Status of Agreement

Table 4.1: Matters agreed between the Applicant and Natural England

Topic/Issue	Record of agreement	Status
Assessment Methodology Protected Species	Letter 27 April 2022	<u>Low</u>
Natural England agrees that the survey methodologies, results and proposed mitigation for these species is appropriate.		
Draft Mitigation Licence Applications (Ghost licences)	Letter of no impediment Natural England to the Applicant dated 7 November 2023.	<u>Low</u>
Bats		
On the basis of the information and proposals provided, Natural England sees no impediment to a licence being issued, should the DCO be granted. It is agreed between the parties that the issues identified within the current draft of the method statement (and included in the letter of no impediment dated 7 November 2023) will need to be addressed before the licence application is formally submitted. The Applicant will ensure that the Method Statement is revised to include these changes prior to formal submission. A copy of the letter is attached at page 10 of Appendix 1.		
Water Voles	Letter of no impediment Natural England to the Applicant dated 25 February 2023	
On the basis of the information and proposals provided, Natural England sees no impediment to a licence being issued, should the DCO be granted. It is agreed between the parties that the issues identified within the current draft of the method statement (and included in the letter of no impediment dated 25 February 2023) will need to be addressed before the licence application is formally submitted. The Applicant will ensure that the Method Statement is revised to include these changes prior to formal submission. A copy of the letter is attached at page 13 of Appendix 1.		
Badgers		

Topic/Issue	Record of agreement	Status
<p>On the basis of the information and proposals provided, Natural England sees no impediment to a licence being issued, should the DCO be granted.</p> <p>It is agreed between the parties that the issues identified within the current draft of the method statement (and included in the letter of no impediment e mail date 2 November 2023) will need to be addressed before the licence application is formally submitted. The Applicant will ensure that the Method Statement is revised to include these changes prior to formal submission. A copy of the letter is attached at page 17 of Appendix 1.</p>	<p>Letter of no impediment e mail Natural England to the Applicant dated 2 November 2023</p>	
<p>Habitats Regulations Assessment Report (HRA)</p> <p>The Applicant and NE agree that an appropriate study area has been used to identify European sites. All Relevant sites have been screened into the HRA following feedback from Natural England requesting that the Applicant should also include an assessment of likely significant effect for the Ouse Washes SAC, SPA and Ramsar Site. Natural England is satisfied with the potential pathways for impact identified in tables 4-1 and 4-2.</p> <p>Natural England agrees with the likely significant effects alone presented in tables 4.3 -4.8 and the in combination effects identified in table 4.9.</p> <p>It is agreed that the correct qualifying features have been identified for each site screened into the HRA.</p> <p>The data used to inform the HRA and the methodology used to undertake the assessment is appropriate. It is agreed that any specific mitigation for which the conclusion relies upon is considered appropriate.</p> <p>Natural England agree that the project will have no significant effect on the sites.</p> <p>Natural England has reviewed the revised HRA Screening Report [REP2-022] and Habitats</p>	<p>Issued to Natural England March 2022 for review and comment. Updated to take account of comments May 2022</p> <p>Issued to Natural England on 2 December 2022 for further review and comment 9 January 2023 response from Natural England</p> <p>Agreement on final version of HRA as submitted with DCO Application.</p>	<p>Low</p>

Topic/Issue	Record of agreement	Status
<p>Regulations Assessment Report [REP2-024] submitted at Deadline 2 following ExQ1 comments about Eversden and Wimpole Woods SAC. Natural England is satisfied that the project will not adversely affect the integrity of the SAC, and this resolves NE’s Written Representation key issue 1 [REP1-164].</p>		
<p>The HRA conclusions for designated sites and other habitat sites are appropriately represented in the Biodiversity Chapter (App doc Ref). Natural England to review final versions of Biodiversity Chapter (App doc Ref 5.2.8) before submitting final comments on assessments and mitigation and Habitat Loss, Disturbance and Severance of Loss.</p>		Low
<p>Natural England reviewing final Code of Construction Practice (CoCP) Parts A and B Appendix 2.1 App Doc Ref 5.4.2.1 and Appendix 2.2 App Doc Ref 5.4.2.2)</p> <p>It is agreed that mitigation measures in the CoCP will control and prevent the discharge of silt into field boundary ditches and the Black Ditch subject to CoCP mitigation and monitoring being agreed with Natural England and secured through the DCO.</p>	Letter 27 April 2022	<u>Medium</u> Low
<p>Outline Water Quality Monitoring Plan</p> <p>The Applicant has prepared a ground water monitoring plan in response to representations made by the Environment Agency and Natural England, as a further document to add to the dDCO Application which sets out the scope and duration of monitoring of groundwater and related surface water features in connection with the construction, operation, and maintenance of CWWTPR. It supports the position presented in the Environmental Statement Volume 2 Chapter 20 -Water Resources (App Doc Ref 5.2.20) states that ‘The scope and duration of borehole water level and quality monitoring will be agreed with all relevant stakeholder before works commence’. This has been shared for comment with The Environment Agency for agreement. The finalised version will be shared Natural England after Deadline 1.</p> <p>The Outline Water Quality Monitoring Plan submitted at Deadline 2, <u>and updated at Deadline 5 as agreed with The Environment Agency</u> (App Doc Ref 5.4.20.13) [REP5-083 2-029] is <u>now agreed</u>.</p>	<u>Email Natural England to the Applicant dated 11 March 2024.</u>	<u>Medium</u> Low

Topic/Issue	Record of agreement	Status
<p>generally acceptable; however, Natural England is still considering some of the monitoring details, particularly the adequacy of monthly / quarterly monitoring, Natural England will review the monitoring reports produced during construction and operation, and will work with the Applicant to resolve any queries/<u>concerns if needed</u>. Natural England has also reviewed the Applicant's responses to key issues 2f and 2g, and is satisfied that these have been adequately addressed.</p>		
<p>Landscape, Ecology, Recreational Management Plan (LERMP) Natural England supports the habitat creation and enhancement measures set out in the LERMP subject to more strategic landscape scale approach to address the effects of recreational pressure on the strategic environment including Stow-Cum-Quy SSSI and locally designated sites. Natural England supports the<u>supports the</u> commitment to maintain BNG habitats for a minimum of 30 years in line with the provisions of the Environment Act 2021.</p>	<u>Agreed</u>	<u>Agreed Low</u>
<p>Outline Soil Management Plan Natural England has reviewed the updated Soil Management Plan (App Doc Ref 5.4.6.3) [REP1-033], [REP 5-060]. <u>Outstanding matters raised are now resolved with the additional agreed wording inserted as additions to sections 5.3 and sections 5.4.4. These additions will be made to [REP5-060] at Deadline 6. The parties continue to discuss but the content is largely agreed save for additional representations regarding peat and peaty soils and the requirement for further ALC surveys and/or a modification to the ALC report to show the full scheme.</u></p>	Email Natural England to the Applicant dated 26 March 2024	<u>Low Medium</u>
<p>Protective Provisions It is agreed between the Parties that NE do not require any protective provisions for the benefit of <u>Natural England</u>.</p>		<u>Low Agreed</u>
<p>Visitor Pressure <u>Natural England and the Applicant have clarified and agreed the position on the issue of recreational pressure. The proposal of a contribution to the administrative cost of the wider recreational group (Combined</u></p>	<u>E mail Natural England to the Applicant dated 2 April 2024</u>	<u>Low</u>

Topic/Issue	Record of agreement	Status
<p>Recreational Group (“CRG”) to help get this established and a contribution towards the management/survey of the wider area, to be secured via the Section 106 agreement [REP3-044] is agreed.</p> <p>It is also agreed by the Applicant that it will add the following wording to the Cumulative Impact Assessment [] as sought by Natural England in their letter dated 11 March 2024. This addition will be made at Deadline 6.</p> <p>It is not yet agreed between the parties that the proposed measures for mitigation including signage/interpretation and alternative walking routes to divert pressure elsewhere and creation of accessible greenspace within the WWTP will effectively mitigate all the effects of additional development and make a significant contribution to existing pressures.</p> <p>The Applicant has agreed to convene a meeting to progress this matter in January.</p>		

5 Matters Under Discussion

Table 5.1: Matters still in discussion between the Applicant and Natural England

~~Agricultural Land and Soils~~

~~Natural England have reviewed the first outline draft of the Soil Management Plan, Baseline Agricultural Land Classification, Agricultural Impact Assessment and Soil Management Plan Appendix 6.1–6.3 (App Doc Ref 5.4.6.1–5.4.6.3) and provided comments. Natural England to review final versions and provide final comments where agreed. Comments as presented in the Relevant Representations from Natural England for further discussion~~

Air Quality/ Noise/Lighting

The Parties agree that significant air quality effects from traffic emissions are not anticipated for ecological receptors subject to final review of DCO Application documentation.

Natural England to review final versions of

- air quality Chapter 7 Air Quality (App doc Ref 5.2.7) and Appendix 7.1 App Doc Ref 5.4.7.1
- noise Chapter 17 (App Doc Ref 5.2.17) and Appendix 17.1-4 (App Doc Ref 5.4.17.1.17.4,

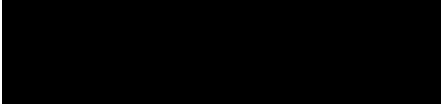
- lighting effects Lighting Design Appendix 2.5 (App Doc Ref 5.4.2.5) and Lighting Assessment Report (App Doc Ref 5.4.15.3) before able to support final conclusion of no significant adverse effects and that appropriate mitigation measures secured through the DCO requirements.

No further comments from Natural England.

6 Agreement on this SoCG

This Statement of Common Ground has been jointly agreed by:

Name: Mark Malcom

Signature: 

Position:

On behalf of: **Anglian Water Services Limited**

Date: 11/04/2024

Name: Janet Nuttall

Signature: 

Position: West Anglia Sustainable Development Casework Officer

On behalf of: **Natural England**

Date: 11 April 2024

Appendix 1

6.1 Letter of No Impediment - Bats

Date: 10 November 2023
Our ref: N/A
(NATIONALLY SIGNIFICANT INFRASTRUCTURE
PROJECT)



Kathryn Taylor, Anglian Water Ltd, as Applicant
Sent by e-mail only

Dear Kathryn Taylor,

DRAFT MITIGATION LICENCE APPLICATION STATUS: INITIAL DRAFT APPLICATION
LEGISLATION: THE CONSERVATION OF HABITATS AND SPECIES REGULATIONS 2017
(as amended) and THE WILDLIFE AND COUNTRYSIDE ACT 1992 (as amended)
NSIP: Cambridge Waste Water Treatment Plant (WWTP)
SPECIES: Common pipistrelle and Soprano pipistrelle.

Thank you for your subsequent draft bat mitigation licence application in association with the above NSIP site, received in this office on the 19/12/2022. As stated in our published guidance, once Natural England is content that the draft licence application is of the required standard, we will issue a 'letter of no impediment'. This is designed to provide the Planning Inspectorate and the Secretary of State with confidence that the competent licensing authority sees no impediment to issuing a licence in future, based on information assessed to date in respect of these proposals.

Assessment

Following our assessment of the resubmitted draft application documents, I can now confirm that, on the basis of the information and proposals provided, Natural England sees no impediment to a licence being issued, should the DCO be granted.

However, please note the following issues have been identified within the current draft of the method statement that will need to be addressed before the licence application is formally submitted. Our wildlife adviser, Cara Doyle, discussed this matter with Kathryn Taylor via e-mail correspondence on the 19th January 2023 where it was discussed which necessary amendments would need to be made. Please do ensure that the Method Statement is revised to include these changes prior to formal submission. For clarity these include:

Please see attached 'LICENSING CONSULTATION ON THE FAVOURABLE CONSERVATION STATUS (FCS) TEST AS PART OF THE PRE-SUBMISSION SCREENING SERVICE'

Next Steps

NSIP LONI (03/12)

Should the DCO be granted then the mitigation licence application must be formally submitted to Natural England. At this stage any modifications to the timings of the proposed works, e.g. due to ecological requirements of the species concerned, must be made and agreed with Natural England before a licence is granted. Please note that there will be no charge for the formal licence application determination, should the DCO be granted, or the granting of any licence.

If other minor changes to the application are subsequently necessary, e.g. amendments to the work schedule/s then these should be outlined in a covering letter and must be reflected in the formal submission of the licence application. These changes must be agreed by Natural England before a licence can be granted. If changes are made to proposals or timings which do not enable us to meet reach a 'satisfied' decision, we will issue correspondence outlining why the proposals are not acceptable and what further information is required. These issues will need to be addressed before any licence can be granted.


Full details of Natural England's licensing process with regards to NSIP's can be found at the following link:

http://webarchive.nationalarchives.gov.uk/20140605090108/http://www.naturalengland.org.uk/images/wmi-g36_tcm6-28566.pdf

As stated in the above guidance note, I should also be grateful if an open dialogue can be maintained with yourselves regarding the progression of the DCO application so that, should the Order be granted, we will be in a position to assess the final submission of the application in a timely fashion and avoid any unnecessary delay in issuing the licence.

I hope the above has been helpful. However, should you have any queries then please do not hesitate to contact me.

Yours sincerely

Cara Doyle
Wildlife Licensing Lead Adviser
Natural England Wildlife Licensing Service
 naturalengland.org.uk

Annex - Guidance for providing further information or formally submitting the licence application.

Important note: when submitting your formal application please mark all correspondence 'FOR THE ATTENTION OF Cara Doyle.'

Submitting Documents.

Documents must be sent to the Customer Services Wildlife Licensing (postal and email address at the top of this letter).

Changes to Documents –Reasoned Statement/Method Statement.

Changes must be identified using one or more of the following methods:

- underline new text/strikeout deleted text;
- use different font colour;
- block-coloured text, or all the above.

Method Statement

When submitting a revised Method Statement please send us one copy on CD, or by e-mail if less than 5MB in size, or alternatively three paper copies. The method statement should be submitted in its entirety including all figures, appendices, supporting documents. Sections of this document form part of the licence; please do not send the amended sections in isolation.

6.2 Letter of No Impediment - Water Voles

Date: 25 January 2023
Our ref: 2023-63773-SPM-NSIP
(NATIONALLY SIGNIFICANT INFRASTRUCTURE
PROJECT)



Kathryn Taylor
Major Infrastructure Projects Team
Anglian Water Services Limited
Sent by e-mail only

Dear Kathryn,

DRAFT MITIGATION LICENCE APPLICATION STATUS: INITIAL APPLICATION
LEGISLATION: COUNTRYSIDE ACT 1992 (as amended), Environment Act 2021
NSIP: Cambridge Waste Water Treatment Plant (WWTP)
SPECIES: Water vole *Arvicola amphibius*

Thank you for your subsequent draft water vole mitigation licence application in association with the above NSIP site, received in this office on the 19/12/2022. As stated in our published guidance, once Natural England is content that the draft licence application is of the required standard, we will issue a 'letter of no impediment'. This is designed to provide the Planning Inspectorate and the Secretary of State with confidence that the competent licensing authority sees no impediment to issuing a licence in future, based on information assessed to date in respect of these proposals.

Assessment

Following our assessment of the draft application documents, I can confirm that, on the basis of the information and proposals provided, Natural England sees no impediment to a licence being issued, should the DCO be granted.

However, please note the following issues have been identified within the current draft of the method statement that will need to be addressed before the licence application is formally submitted. Please do ensure that the Method Statement and any associated documents are revised to include these changes prior to formal submission. For clarity these include:

- Named ecologist information not supplied. A named ecologist is a professional ecological consultant who has the relevant skills, knowledge and experience of working with water voles. Read about the experience you need to be a named ecologist: [References and experience needed to support your protected species application or registration - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/references-and-experience-needed-to-support-your-protected-species-application-or-registration)
- It is currently unclear if the named ecologist has visited the site. To be addressed in formal application.

NSIP LONI (03/12)

- In section 5.2.3 details of what will occur if water voles are found during destructive search should be included.
- As a result in changes in legislation brought about by Environment Act 2021, water vole licensing the application now need to be submitted under the new purpose of 'reasons of overriding public interest' using new forms which have been published on Gov.uk.
<https://www.gov.uk/government/publications/water-voles-apply-for-a-mitigation-licence-a11>
- In addition, a Reasoned Statement – is now mandatory for water vole applications that are submitted for the purpose of Reasons of Overriding Public Interest.
- A figure titled: 'Locations and habitats where all capture and exclusion activities will be undertaken'. This should be a dated plan sent as separate document (i.e. not imbedded in the method statement)

This plan must:

- show capture sites and clearance of water vole habitat
- indicate which areas will be subject to the different methodologies
- include direction of displacement with arrows where applicable
- show the location of any water vole fencing or bunds

- A figure titled: 'Specifications for mitigation or compensation. This should be a dated plan sent as separate document (i.e. not imbedded in the method statement)

This plan must:

- show all habitat creation, restoration or enhancement for water voles
- clearly identify the location of release sites for captured water voles, where applicable
- the design and dimensions for any mammal ledges under culverts, bridges or other linking structures
- for development schemes, include the final development layout.

If the scheme is large or complicated it may be necessary to submit more than one figure

Next Steps

Should the DCO be granted then the mitigation licence application must be formally submitted to Natural England. At this stage any modifications to the timings of the proposed works, e.g. due to ecological requirements of the species concerned, must be made and agreed with Natural England before a licence is granted.

If other minor changes to the application are subsequently necessary, e.g. amendments to the work schedule/s then these should be outlined in a covering letter and must be reflected in the formal submission of the licence application. These changes must be agreed by Natural England before a licence can be granted. If changes are made to proposals or timings which do not enable us to meet reach a 'satisfied' decision, we will issue correspondence outlining why the proposals are not acceptable and what further information is required. These issues will need to be addressed before any licence can be granted.

Full details of Natural England's licensing process with regards to NSIP's can be found at the following link:

http://webarchive.nationalarchives.gov.uk/20140605090108/http://www.naturalengland.org.uk/faqes/wml-g36_tcm6-28566.pdf

As stated in the above guidance note, I should also be grateful if an open dialogue can be maintained with yourselves regarding the progression of the DCO application so that, should the Order be granted, we will be in a position to assess the final submission of the application in a timely fashion and avoid any unnecessary delay in issuing the licence.

I hope the above has been helpful. However, should you have any queries then please do not hesitate to contact me.

Yours sincerely

Cassandra Jackson
Senior Adviser
Natural England

@naturalengland.org.uk

Annex - Guidance for providing further information or formally submitting the licence application.

Important note: when submitting your formal application please mark all correspondence 'FOR THE ATTENTION OF CASSANDRA JACKSON'

Submitting Documents.

Documents must be sent to the Customer Services Wildlife Licensing (postal and email address at the top of this letter).

Changes to Documents –Reasoned Statement/Method Statement.

Changes must be identified using one or more of the following methods:

- underline new text/strikeout deleted text;
- use different font colour;
- block-coloured text, or all the above.

Method Statement

When submitting a revised Method Statement please send us one copy on CD, or by e-mail if less than 5MB in size, or alternatively three paper copies. The method statement should be submitted in its entirety including all figures, appendices, supporting documents. Sections of this document form part of the licence; please do not send the amended sections in isolation.

6.3 Letter of No Impediment - Badgers

Date: 02 November 2023
Our ref: 2023-63737-SPM-WLM
(NATIONALLY SIGNIFICANT INFRASTRUCTURE
PROJECT)



Kathryn Taylor, Major Infrastructure Planning Manager,
Anglian Water
Sent by e-mail only

Dear Kathryn Taylor,

<p>DRAFT MITIGATION LICENCE APPLICATION STATUS: SUBSEQUENT DRAFT APPLICATION LEGISLATION: THE PROTECTION OF BADGERS ACT 1992 (as amended) NSIP: Cambridge Wastewater Treatment Relocation Project. SPECIES: Badger (<i>meles meles</i>).</p>
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Thank you for your subsequent draft badger mitigation licence application in association with the above NSIP site, received in this office on the 23/10/2023. As stated in our published guidance, once Natural England is content that the draft licence application is of the required standard, we will issue a 'letter of no impediment'. This is designed to provide the Planning Inspectorate and the Secretary of State with confidence that the competent licensing authority sees no impediment to issuing a licence in future, based on information assessed to date in respect of these proposals.

Assessment

Following our assessment of the resubmitted draft application documents, I can now confirm that, on the basis of the information and proposals provided, Natural England sees no impediment to a licence being issued, should the DCO be granted.

Next Steps

Should the DCO be granted then the mitigation licence application must be formally submitted to Natural England. At this stage any modifications to the timings of the proposed works, e.g. due to ecological requirements of the species concerned, must be made and agreed with Natural England before a licence is granted. Please note that there will be no charge for the formal licence application determination, should the DCO be granted, or the granting of any licence.

If other minor changes to the application are subsequently necessary, e.g. amendments to the work schedule/s then these should be outlined in a covering letter and must be reflected in the formal submission of the licence application. These changes must be agreed by Natural England before a licence can be granted. If changes are made to proposals or timings which do not enable us to meet reach a 'satisfied' decision, we will issue correspondence outlining why the proposals are not acceptable and what further information is required. These issues will need to be addressed before any licence can be granted.

NSIP LONI (03/12)

Full details of Natural England's licensing process with regards to NSIP's can be found at the following link:

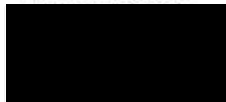
http://webarchive.nationalarchives.gov.uk/20140605090108/http://www.naturalengland.org.uk/Images/wml-g36_tcm6-28566.pdf

As stated in the above guidance note, I should also be grateful if an open dialogue can be maintained with yourselves regarding the progression of the DCO application so that, should the Order be granted, we will be in a position to assess the final submission of the application in a timely fashion and avoid any unnecessary delay in issuing the licence.

I hope the above has been helpful. However, should you have any queries then please do not hesitate to contact me.

Yours sincerely

Owen Turner



aturalengland.org.uk

Annex - Guidance for providing further information or formally submitting the licence application.

Important note: when submitting your formal application please mark all correspondence 'FOR THE ATTENTION OF (OWEN TURNER)'.

Submitting Documents.

Documents must be sent to the Customer Services Wildlife Licensing (postal and email address at the top of this letter).

Changes to Documents –Reasoned Statement/Method Statement.

Changes must be identified using one or more of the following methods:

- underline new text/strikeout deleted text;
- use different font colour;
- block-coloured text, or all the above.

Method Statement

When submitting a revised Method Statement please send us one copy on CD, or by e-mail if less than 5MB in size, or alternatively three paper copies. The method statement should be submitted in its entirety including all figures, appendices, supporting documents. Sections of this document form part of the licence; please do not send the amended sections in isolation.

Appendix 2

Table 1.1: Schedule of engagement undertaken to date with Natural England

Date	Form of correspondence	Topics discussed and key outcomes
August 2020	Initial discussion on project Phase 1 consultation period	SSSI impact risk zones for the three sites under consideration. with regard to Natural England’s Impact Risk Zones (IRZs) i.e. that the screening reports need to make clear reference to the potential indirect SSSI impacts triggered by the IRZs and should include appropriate evidence to support any no adverse effect conclusion. The shortlisted sites trigger several IRZs for this type of development, in addition to that for Stow Cum Quy Fen SSSI identified in the report. Our SSSI officers were unable to offer any further advice regarding risk / potential pathways for impact to these sites based on the level of detail currently available. On this basis, and in view of the internationally designated status of some of these sites, the precautionary approach should be applied; the report should set out how potential impacts, including any in-combination effects, will be addressed through the next stage/s of the assessment.
7 January 2021	Meeting with the Applicant and Natural England	Introduction to scheme and site options, DCO process, project timescales and engagement methodology need for Hydrological Impact Assessment and proposed methodology.
March 2021	Biodiversity and Ecology TWG	TWG meeting to brief stakeholders on the future programme for EIA Scoping, including identification of key technical topics and methodologies, public consultation and submission of the DCO application
21 April 2021	Email the Applicant to Natural England	Reports sharing the Applicant’s proposed ecological survey methodologies with Natural England.
11 June 2021	Biodiversity and Ecology TWG	<ul style="list-style-type: none"> • Ecology • Protected Species • Water voles • Bats • Badgers
20 August 2021	Email the Applicant and Natural England	Identifying and sharing Shared CWWTPR Stage 4 Final Site Selection Hydrogeological Impact Assessment (Mott MacDonald, March 2021) HIA report.
6 September 2021	Email Natural England and the Applicant	Natural England’s advice on the HIA report and related matters.
15 October 2021	Email the Applicant to Natural England	Forwarding design and mitigation proposals for final outfall structure and copy of meeting notes of meeting with

		Environment Agency to discuss the same held on 14 October 2021.
11 November 2021	Meeting the Applicant and Natural England	Specific issues arising out of the Scoping Report Update on HRA and BNG from AWS Focused discussion on specific mitigation topics to include; <ul style="list-style-type: none"> - Hedgerow species - Wetland areas and type - Habitat creation and management proposals - Mix of woodland/Fenland landscape, how is this best achieved? - Protected Species
24 January 2022	Meeting the Applicant and Natural England	Meeting held to discuss likely consultation on AWS's screening request for the new foul water pipeline for the Waterbeach New Town and explain the potential connection of this with the project.
21 February 2022	Email the Applicant to Natural England	Sharing of TWG meeting notes of 3 February 2022 setting out application of Defra 3.0 metric and BNG calculation
13 March 2022	Email the Applicant to Natural England	Forward of HRA report for first Phase review by Natural England
14 April 2022	Meeting the Applicant and Natural England	Consultation Phase 3 review and discussion and BNG proposals
28 June 2022	Meeting the Applicant and Natural England	Updates on surveys to date and Ghost species licence applications and methodology in light of NE guidance. Broad agreement work to date and on scope for remainder of surveys.
8 December 2022	TWG sharing advance copies of ES chapters	Review of ES chapters in advance of submission and Phase 2 version of HRA for comment.
January 2023	Email Natural England to the Applicant	Comments on Ghost licences for Bats, Badgers and Water Vole with further recommendations to secure letter of no impediment.
May 2023	Meeting the Applicant and Natural England	Meeting to discuss with Natural England the following key topics: <ul style="list-style-type: none"> • DCO update and programme • HRA updates • Confirmation on Ghost licenses for protected species licenses • Review of outline LERMP • Habitat loss/gains calculations • Review of first draft of SoCG

Get in touch

You can contact us by:



Emailing at info@cwwtpr.com



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



Writing to us at **Freepost: CWWTPR**



Visiting our website at 

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

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