

## Response to ExA's First Written Questions (ExQ1)

This document sets out the response to the Examining Authority (ExA)'s First Written Questions (ExQ1) by Cambridgeshire County Council (CCC). The table below sets out the topic, question number and CCC response.

Question Number	Question for	Question	Cambridgeshire County Council (CCC) Response
<b>General &amp; Cross Topic Questions</b>			
Q1.1.17	The Applicant	<b>Human Health</b> Have health authorities been consulted regarding the potential impacts of the scheme, and if so what comments, if any, have been made?	Cambridgeshire County Council's Public Health Service has provided comments at all stages of the NSIP process to ensure health and wellbeing are built into the project. Comments as part of the Examination are referenced below.  Relevant Representation [RR-150] – See Chapter 12, 'Other Environmental Topics (ES Chapter 16)'.  Local Impact Report [REP1-075] – See Chapter 2.10, 'Health (ES Chapter 16 Other Environmental Topics)'.  
<b>Air Quality and Emissions</b>			
Q1.2.1	Local Authorities	<b>Compliance with Local Policies</b> Paragraph 7.13.16 of the Planning Statement [APP-031] states that the proposed development is in compliance with local policies in respect of Air quality. Do the local authorities agree?	To note the applicable local policies as it relates to Cambridgeshire are part of Huntingdonshire District Council's Local Plan. Huntingdonshire District Council will provide a response to this question.
<b>Biodiversity, ecology and natural environment (including Habitats Regulations Assessment (HRA))</b>			

Q1.3.2	HDC	<p><b>BNG Monitoring</b> Please outline any comments on the use of a Planning Performance Agreement to facilitate the resourcing of BNG monitoring in lieu of a S106 agreement.</p>	<p>Joint response from the Host Authorities:</p> <p>The Host Authorities do not consider that a Planning Performance Agreement (PPA) is an appropriate legal and planning mechanism to resource and financially secure Biodiversity Net Gain (BNG) and/or any other monitoring fee in lieu of a Section 106 agreement.</p> <p>In the context of UK planning law, PPAs are voluntary agreements between Parties; they are generally not legally binding contracts in the traditional, enforceable sense. Consequently, PPAs do not offer a Local Planning Authority (LPA) financial security against a scheme. In particular, a PPA does not create planning obligations, nor does it run with the land or bind successors in title i.e. PPAs have no mechanism to be enforceable against an Application/ scheme allowing for enforcement if in breach. PPAs are in a broad sense a Memorandum of Understanding between Parties; it is a project management and cost recovery tool intended to support the handling of an application through the consenting process.</p> <p>Rarely are PPAs extended for the life of a scheme post-consent, in this case 40-years. By contrast, a Section 106 agreement is a statutory planning obligation that is legally enforceable and capable of binding the land and future owners.</p> <p>In BBC's Local Impact Report [REP1-071] Matter 37, it was suggested that a fee for the monitoring of BNG, ecology and landscape mitigation works could be secured through a Section 106 agreement or the proposed Landscape and Ecological Management Plan (oLEMP) Steering Group mechanism as set out in section 4.2 of the oLEMP. The other Host Authorities set out a similar position in their Local Impact Report. (Cambridgeshire County Council's Local Impact Report [REP1-075], paragraph 2.3.41).</p> <p>An alternative approach could be to include an agreed monitoring contribution within the Terms of Reference of the oLEMP and to introduce</p>
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Q1.3.7	Local authorities	<p>Biodiversity Net Gain Report [APP-168] Paragraph 2.3.8 references that the Bedfordshire and Cambridgeshire's Local Nature Recovery Strategies were due to be published in December 2025. Have they been produced, and what implications, if any, have they for the proposed development?</p>	<p>The Cambridgeshire and Peterborough Local Nature Recovery Strategy (LNRS) was published on 23<sup>rd</sup> December 2025. The strategy is available to read or download from Local Nature Recovery Strategy (LNRS) - Cambridgeshire &amp; Peterborough Combined Authority (CPCA)* along with the Local Nature Recovery Strategy Local Habitat Map**.</p> <p>The document sets out the priorities for nature recovery across Cambridgeshire and Peterborough, identifying LNRS priority habitats and LNRS priority species and targeted actions.</p>

			<p>A <u>LNRS Habitat Map</u> has been produced to show the mappable measures for LNRS priority habitats, showing where habitats should be created or existing habitats enhanced. The published LNRS confirms that parts of the draft order limits lie within local priority habitats and mapped nature-recovery areas.</p> <p>The proposed development site falls within areas identified for habitat creation / enhancement, including the following habitat actions:</p> <ul style="list-style-type: none"> <li>- woodland creation (action Wo3A) located in Site C, close to Huntingdon Woods</li> <li>- species-rich neutral grassland creation (action G2B) located in Site D</li> <li>- create 50m buffer zones along rivers (action RD1A) located in Site C</li> </ul> <p>The habitats and their management proposed within the outline Landscape and Ecological Management Plan [REP2-033] will also support populations of LNRS priority species, particularly farmland birds that will benefit from general enhancements / sensitive management. The scheme will also support LNRS species that have bespoke actions, such as the Turtle Dove.</p> <p>The applicant has already amended the Biodiversity Net Gain Report (Tracked) P02 [REP1-053] to reflect the published status of the LNRS.</p> <p>* <a href="https://cambridgeshirepeterborough-ca.gov.uk/local-nature-recovery-strategy-lnrs/">https://cambridgeshirepeterborough-ca.gov.uk/local-nature-recovery-strategy-lnrs/</a> ** <a href="https://experience.arcgis.com/experience/a1963a7dc51c4c259a8d19832b63f461">https://experience.arcgis.com/experience/a1963a7dc51c4c259a8d19832b63f461</a></p>
Q1.3.8	Natural England	Biodiversity Net Gain Report [APP-168] Please confirm that you are content with the Biodiversity Net Gain report and the metric used	The Biodiversity Net Gain Report has been superseded by version P02 [REP1-053]. The Council remains concerned that the BNG report is incomplete, please see comments relating to Biodiversity Net Gain Report [REP1-053] in the other submission at Deadline 3, responding to the Applicant's submissions at Deadline 2.

Q1.3.9	The applicant	<p><b>Outline Landscape Environmental Management Plan [REP1-040]</b> Paragraph 4.2.2 details membership of a steering group to be created. Are there any local specialist species related groups that should be considered for membership?</p>	<p>The Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire would be the most appropriate local organisation to include in the membership, given their experience of managing sites for nature (including farmland birds in Cambridgeshire. However, they would require payment to cover their time / input.</p> <p>Given the potential impact to farmland birds, It would be useful to ask RSPB to be on the steering group to help advice on monitoring of farmland birds, but again, they would require resources to undertake a role.</p>
Q1.3.10	The applicant	<p><b>Outline Landscape Environmental Management Plan [REP1-040]</b> Paragraph 8.2.1 states that ecological monitoring will take place for at least 30 years. Can the applicant explain in what circumstances the monitoring would be extended in length?</p>	<p>We would support management and monitoring of all ecological features throughout the lifetime of the project, to ensure that all ecological mitigation and enhancements set out in the oLEMP [REP1-040] continue to be monitored throughout the lifetime of the project. Particularly regarding farmland birds.</p> <p>It terms of delivering Biodiversity Net Gain (and in line with the statutory metric), It should be noted that 30 years is the minimum monitoring period but should only finish when all post-development habitats meet their BNG habitat type and condition as set out in the statutory metric (e.g. exceed 30 years).</p>

Q1.3.13	Natural England Cambridgeshire County Council Huntingdon District Council	<p><b>Baseline ecological survey coverage</b></p> <p>Are NE, CCC and HDC satisfied with the coverage of the ecological surveys undertaken to inform the baseline conditions of the ecology and nature conservation assessment within the ES <a href="#">[APP-043]</a>?</p>	<p>The Council has raised a number of concerns at paragraphs 2.3.8 – 2.3.20 within the Local Impact Report [REP1-075] regarding the coverage of ecological surveys for protected species (bats, great crested newts, water vole and arable flora) within the ES. Concerns were also raised at paragraph 2.3.25 about the accuracy of the BNG assessment, given incomplete habitat surveys. In particular these concerns relate to how any limitations in the data have been addressed and the extent to which they may influence the robustness of the assessment conclusions and adequacy of mitigation / compensation measures.</p> <p>The Applicant has responded to these points and provided further clarification within the 'Applicant Response to Local Impact Reports P01' [REP2-043]. The Council is satisfied that further survey work for great crested newt is not required. It is considered that further survey work is still required for bats and water vole. The applicant has also committed to discussion management for arable flora with the Council – the requirement for further survey work will depend on the outcomes of these discussions.</p> <p>The council is currently reviewing this information, and any areas of ongoing disagreement regarding the coverage or adequacy of ecological surveys will be reflected in the Draft Statement of Common Ground.</p>
Q1.3.15	The applicant	<p><b>Priority Habitats</b></p> <p>Please provide a Habitats of Principal Importance Plan.</p>	<p>The Council welcomes the request for a Habitats of Principal Importance Plan, which will help to address some of the Council's previous concerns / comments. We also suggest that a plan showing irreplaceable habitats (e.g. ancient / veteran trees) is produced.</p>

Q1.3.16	The applicant	<p><b>Short Term Minor Adverse Effects</b> At paragraph 7.12.2 of ES Chapter 7: Ecology and Nature Conservation [APP-043] it concludes that 'During the construction phase the Scheme would result in short term and temporary minor adverse effects on ground nesting birds, the wider breeding bird assemblage, amphibians (including great crested newt) and otter.' For clarity, can the applicant confirm whether the short term and temporary minor adverse effects are reversible?</p>	The Council considers that impacts to ground nesting birds will be long-term due to the removal of nesting habitat, with reinstatement of habitat not possible until decommissioning.
<b>Cultural heritage</b>			
Q1.4.7	The applicant	<p><b>Outline Heritage Enhancement Strategy [REP1-050]</b> Paragraph 4.2.5 sets out the applicant's intention to host workshops for greater understanding of the historic environment. there are a number of examples of community led character appraisals and management strategies having been prepared by the local communities. Is this something that could be provided and supported, if the community wish to undertake this exercise?</p>	Cambridgeshire County Council would welcome being part of the planning of such workshops.
Q1.4.8	Local Authorities	<p><b>Conservation Area Character Appraisals or Management Strategies</b></p>	As it relates to Cambridgeshire, Huntingdonshire District Council will provide a response to this question.

		Please provide any character appraisal or management strategies that relate to the conservation areas within the vicinity of the proposed development.	
<b>Draft Development Consent Order (dDCO) &amp; Explanatory Memorandum</b>			
Q1.5.2	Local Authorities	<p><b>Article 8 Disapplication and modification of legislative provisions</b> Article 8(4) seeks to disapply the Community Infrastructure Levy Regulations 2010. Do any of the Local authorities have a CIL charging schedule in place, and would the proposed development be caught by the charging schedule?</p>	Huntingdonshire District Council is a CIL Charging Authority and will respond to this question.
Q1.5.4	Local Highway Authority	<p><b>Article 14(2) Access to Works</b> Does the local Highway Authority consider 28 days to be a sufficient timeframe in which to make a decision?</p>	<p>Cambridgeshire County Council considers more detail is needed as to how, as the highway authority, it approves, inspects and signs off works on the public highway. The suggestion is this is through protective provisions for both local highway authorities. This will specify timescales and would negate the need for to be included as part of article 14.</p> <p>Cambridgeshire County Council makes reference to Cambridge Waste Water Treatment Plant Relocation DCO as an example. In that 40 working days is specified as the duration of time to approve submissions of details which the council considers as sufficient.</p>
Q1.5.10	The Applicant	<p><b>Article 41(5) and Hedgerow plans</b> Hedgerow plans show the proposed removal of several</p>	The hedgerows will not form part of the adopted highway maintainable at public expense, however the removal may be required on the grounds of highway safety for the provision of appropriate vehicle to vehicle splays.

		hedgerows which border a publicly maintainable highway. Per Part 7, Article 41(5) of DCO, has prior consent of the relevant Highway Authority been obtained?	Any trees that are affected with regard to possible pollarding will need to be assessed with regards to their significance by the tree officer. Any tree removal required should be replaced with two trees in compensation in line with adopted policy.
<b>Landscape and visual impact assessment</b>			
Q1.6.4	Local Authorities	<b>Chapter 5 Landscape and Visual [APP-041]</b> Paragraph 5.3.6 indicates that the local authorities have not commissioned an external qualified resource to comment on the LVIA. Has this now been commissioned jointly by the local authorities?	As set out in both Huntingdonshire District Council's Relevant Representation [RR-494] and Local Impact Report [REP1-077], AECOM has been jointly appointed by the three Host Authorities under a Memorandum of Understanding, and with the agreement of the Applicant. AECOM is acting as an external consultant on behalf of all three authorities to assess landscape and visual impact matters, including review of the LVIA.
<b>Traffic and Transport</b>			
Q1.11.3	The applicant and Local Highway Authorities	<b>Outline Construction Traffic Management Plan [REP1-034]</b> Section 4.5 provides details of Sustainable Travel options for construction workers. It is noted that construction workers 'will be encouraged' to use or consider sustainable travel measures. I also note references to sustainable transport options being 'promoted' or 'provided' in Table 16.3 of ES Chapter 16: Other Environmental Topics [APP-052]  Given this assumption has been used to inform traffic generation figures, can the applicant consider a regime where construction workers were compelled to use sustainable	Cambridgeshire County Council has noted the inclusion of a 'Shuttle Bus' service to bring workers in from locations in the area and the applicant has agreed this in the Travel Plan. It is expected further detailed proposals will be submitted as part of a future submission.  It would be very difficult to enforce employees to travel by non-car modes and utilise the shuttle bus, although the number of vehicles and their occupancy can be monitored by ANPR/CCTV cameras at site entrances/exits.

		<p>travel options, such as the drop off/ pick up option outlined in paragraphs 4.5.5 and 4.5.6. How could this be controlled and enforced through a Requirement to ensure traffic volumes do not increase and put pressure on the strategic road network?</p> <p>Can the Local Highway Authorities comment on the sustainable travel options for the transport of construction workers to the site and could other initiatives be considered?</p>	
Q1.11.4	The Applicant	<p><b>HGVs</b> <b>Paragraph 7.11.17 of the Planning Statement [APP-031]</b> discusses the reducing the impact of HGVs travelling to and from the site will be managed to minimise the number of HGVs arriving during the highway peak hours. How will this be enforced and what happens if drivers choose to ignore the measures put in place?</p>	The applicant has been advised to look at a Geofencing option to ensure HGV's comply with designated times.

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