

Comments on the Applicant's D2 Submissions

This document sets out the comments by Cambridgeshire County Council (**CCC**) on the Applicant's Deadline 2 (**D2**) submissions. The table below provides the relevant paragraph or reference numbers.

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

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Applicant Response to Local Impact Reports [\[REP2-043\]](#)

Topic	Paragraph Number	Council's Comments
Biodiversity - Decommissioning	2.3.2, 2.3.42, 2.3.44, 2.3.45, 2.3.46	<p>The Council welcomes the applicant's confirmation that woodland / hedgerows and trees will be retained at decommissioning, as well as confirming other elements (grassland / pasture) would remain on site at decommissioning but their future retention would be at the discretion of the landowners, within the outline Landscape and Ecological Management Plan (oLEMP) [REP1-040].</p> <p>The Council is still of the opinion that the proposed development should consider how habitat retention and monitoring can be secured beyond decommissioning. We consider to identify potential opportunities to retain and manage they habitats beyond decommissioning and support the landowner will be an important role for the steering group (overseeing the implementation of the oLEMP). It is therefore recommended the oLEMP is updated to ensure that the landowner is actively engaged in the steering group process towards the end of the lifetime of the scheme.</p>
Biodiversity – Huntingdon Woods	2.3.9	The Council considers the matter regarding potential hydrological impact to Huntingdon Woods to be resolved.
Biodiversity – Illustrative Environmental Masterplan	2.3.10	<p>The Council seeks the Illustrative Environmental Masterplan [APP-121] be updated to remove this drafting error. Although it is an illustrative masterplan, it must be accurate and avoid any errors being carried forward into production of detailed landscape drawings etc.</p> <p>The orange circle on drawing below indicates location of where some of the triangle of existing woodland is being lost to another habitat (although it is unclear what this habitat will be) on Sheet 10 of Illustrative Environmental Masterplan [APP-121]</p>

Biodiversity – Great Crested Newt	2.3.16-2.3.17	We welcome further clarification regarding lack of surveys for Great Crested Newts. We consider this matter to be resolved.
Biodiversity – Water Vole	2.3.18	<p>The Council is still concerned that sub-optimal surveys were completed of the watercourses that will be impacted by the scheme. Insufficient survey work / evidence has been provided to confirm whether water vole is present or absent. Therefore our position is the same – further survey work is required to determine the impact of the scheme on water vole. This should include two surveys completed at an appropriate time of year, using appropriate methods (e.g. suitable for dense vegetation).</p> <p>The Council accepts that further water vole survey work is not required for the watercourses to be ‘enhanced’ as part of the scheme, where it has been confirmed that no in-channel enhancements or ground works to the riparian corridor will occur (works are limited to grassland management of banks).</p>
Biodiversity - invertebrates	2.3.19 & 2.3.36	The applicant refers to a literature review by BSG Ecology – a citation should be provided, to allow the Council to review this research.
Biodiversity – arable flora	3.2.20 & 3.2.37	The Council welcomes the applicant’s offer to further discuss opportunities for arable flora within the landscape masterplan – prior to Deadline 3.
Biodiversity – farmland birds	3.2.22, 3.2.30, 3.2.34 & 3.2.35	We refer the applicant to the Council’s Comments on any updated or additional documents from the applicant [REP2-049] with regards to the Outline Landscape and Ecological Management Plan [REP1-041] and farmland bird mitigation.
Biodiversity - BNG	3.2.23	The Council welcomes the submission of the BNG GIS layer and will provide comments at Deadline 3.
Biodiversity – BNG	3.2.29	The Council welcomes confirmation of the enhancements to the River Kym. Issue resolved.

Biodiversity – solar panels	2.3.39	The Council welcomes confirmation of the design of the solar panels and effect on birds. Issue resolved.

ES Vol 1 Chapter 15: Climate Change [\[REP2-013\]](#)

Topic	Paragraph Number	Council's Comments
GHG Assessment	Table 15.13 Pp15-59	Updated figures and assumptions related to travel are welcomed.

ES Vol 2 Technical Appendices: Appendix 6-9: Site D Trial Trench Evaluation Final Report [\[REP2-018\]](#)

Topic	Paragraph Number	Council's Comments
Site D Trial Trench Evaluation Final Report	General	A new ECB number should be obtained from the Council's Historic Environment Record for Site D. This report uses the one issued for Site C.
	1.7	This is inaccurate for a DCO – the Local Planning Archaeologist will not alone determine the mitigation strategy. Requirement 11 states the archaeological mitigation strategy is to be agreed with the local planning authority in consultation with the county archaeologist and Historic England. Please could the applicant amend to show the correct procedure.
	3.1	The wording should be changed to Area D, not Area B.
	6.64	The results for Trench 935 need further consideration of why the geophysical anomalies did not show up, especially as a feature was found in section.
	11.1	This did not take place – The council would like to request for this to be removed.
	Figures	None of the detailed trench plans contain feature or cut numbers – please can the applicant review and amend this document as features can only be located on a detailed read of trench descriptions.

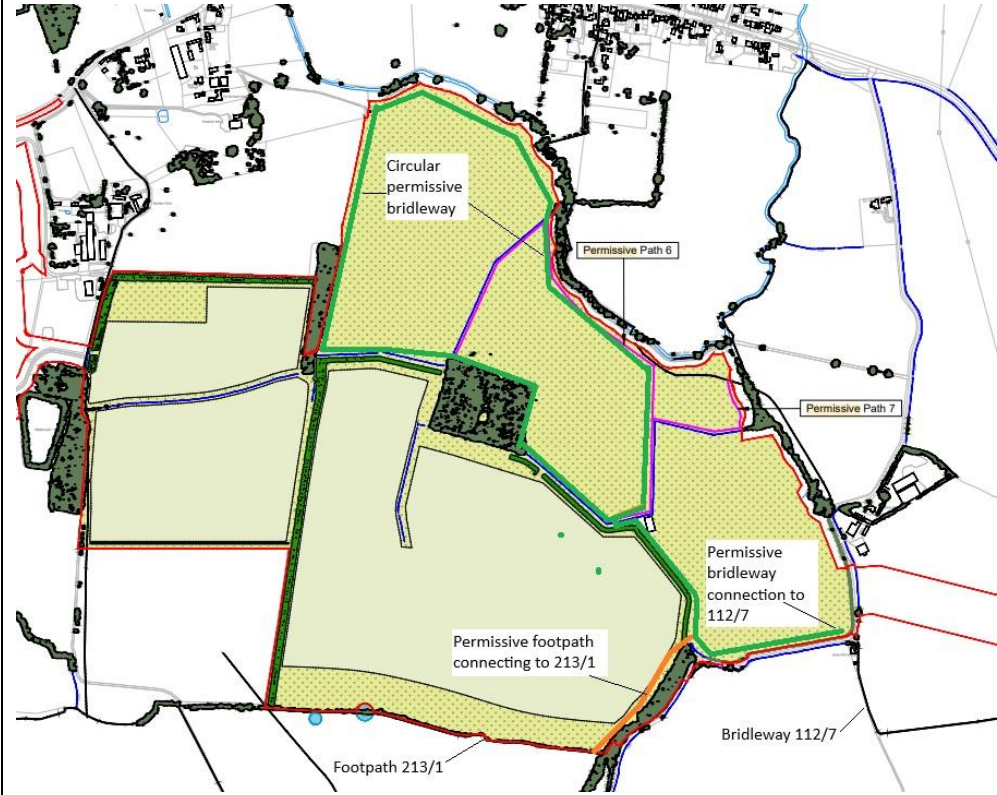
	Appendix C	An original OASIS form should be added to the report. The Council's Historic Environment Team are happy to answer any direct queries about this.

Outline Archaeological Mitigation Strategy [\[REP2-035\]](#)

Topic	Paragraph Number	Council's Comments
	5.3.4, 6.3.42, 7.3.20 and 21, 7.3.37, 7.3.42, 7.5.6, 10.2.2 and 3	The Council welcomes the changes made.

Outline Landscape and Ecological Management Plan [\[REP2-033\]](#)

Topic	Paragraph Number	Council's Comments
Public Rights of Way / Permissive Paths	5.3.44 And Appendix 1	CCC understands that the final routes of proposed permissive paths are yet to be determined. However to be satisfied that the routes offer sufficient mitigation, it is important for CCC to understand the true extent of permissive access that is being offered. Furthermore, permissive paths should be accessible to and inclusive of as wide a range of users as possible, providing enhanced connectivity for the adjoining network of PROW. It is noted that permissive footpaths are proposed within area C (permissive paths 6 and 7). These paths fail to maximise the access opportunities offered by the land set aside for environmental mitigation and could provide both (i) a more extensive and well-connected leisure opportunity by extending further across area C, and (ii) a more inclusive offer by providing access for equestrian users approaching the site from the nearby Bridleway 112/7. The land also offers an opportunity to provide an off-road connection between Bridleway 112/7 and Footpath 213/1. A sketch of these potential enhancements is included in the next row below. Additionally, it is not entirely clear from the Appendix plan whether permissive path 6 will connect at its northern point to the existing footpath 213/3. Clarity is sought on this point, as this is the closest and most convenient access point to the permissive paths from Staughton.

<p>Public Rights of Way / Permissive Paths</p>	<p>Appendix 1</p>	<p>Proposed permissive brideways shown in green. Proposed permissive footpaths shown orange. Applicant's proposed paths to remain (where not coinciding with CCC's proposals).</p> 
<p>Public Rights of Way / Permissive Paths</p>	<p>5.3.45</p>	<p>This is unacceptable. The threat that a permissive path may be removed presents the risk that mitigation for the development could also be removed. CCC requests measures are in place to prevent and proactively manage any instances of antisocial behaviour, rather than simply closing the only public access mitigation that is being offered within the County.</p>

Public Rights of Way / Permissive Paths	6.3.11	Public Rights of Way must not be obstructed at any time, unless the appropriate permissions have been provided by the Local Highway Authority and suitable temporary diversions have been provided.
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Natural England Letter of No Impediment: Great Crested Newts [\[REP2-047\]](#)

Topic	Paragraph Number	Council's Comments
Compensation Measures	Paragraphs 2 & 4, Page 6	The Council welcomes confirmation that Natural England sees no impediment to a licence being issued and considers that <i>“the proposed compensation measures are appropriate and are likely to result in a net gain for great crested newts at the population level”</i> . Although, <i>“the effectiveness of the compensation is dependent on delivery over the long term and on the maintenance of appropriate management regimes.”</i>
Post-Development Management, Maintenance and Monitoring	Paragraph 6, Page 6	The Council is concerned that Natural England has raised the issue of lack of post-development great crested newt population monitoring and considers <i>“the absence of monitoring proposals limits the ability to verify the effectiveness of the mitigation and compensation measures.”</i> Therefore, the Council seeks the Outline Landscape and Ecological Management Plan [REP2-032] is updated to include monitoring scheme for great crested newt.

END