GREATER CAMBRIDGE PARTNERSHIP

Cambridgeshire County Council

The Cambridge South East Transport Order

Transport And Works Act 1992

Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006

Applicant's Statement of Common Ground with The Environment Agency

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Rev 2	

1. Introduction

1.1 Purpose of this document

1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the Cambridge South East Transport Scheme (the “Scheme”) as part of the application made by Cambridgeshire County Council (the “Applicant”) to the Secretary of State for Transport, for a Transport and Works Act Order (TWAO) under sections 1, 3 and 6 of the Transport and Works Act 1992 (the “1992 Act").

1.1.2 A detailed description of the Cambridge South East Transport scheme ("The Scheme") can be found in Chapter [2] of the Applicant's Environmental Statement (Doc Ref [CD1-10.02])

1.1.3 This SoCG does not seek to replicate information which is available elsewhere with the application documents. All application documents referred to are available on the Inquiry website.

1.1.4 This SoCG has been produced to confirm to the Inquiry and Secretary of State where agreement has been reached between the parties to it, and where agreement has (not) yet been reached. SoCGs are an established means in the planning process of allowing parties to identify and focus on specific issues that may need to be addressed during the Inquiry.

1.2 Parties to this Statement of Common Ground

1.2.1 This SoCG has been prepared between (1) the Applicant and (2) The Environment Agency.

1.2.2 The Applicant is the Local Highway Authority for its administrative area for the strategic road network and has the necessary powers and duties to operate, manage, maintain, and enhance the local transport network.

1.2.3 The Environment Agency interest in the project is as the local flood authorities, which are responsible for managing the risk of flooding from surface water, groundwater and ordinary watercourses .

1.3 Terminology

1.3.1 Within the table in Section 3, Issues of this SoCG, the terminology is as follows:

- “Agreed” indicates area(s) of agreement.
- “Under Discussion” indicates area(s) of current disagreement where resolution remains possible, and where parties continue discussing the issue(s) to determine whether they can reach agreement by the end of the Inquiry; and
- “Not Agreed” indicates a final position for area(s) of disagreement where the resolution of the divergent positions will not be possible, and parties agree on this point.

1.3.2 1.1.9 It can be assumed that any matters not specifically referred to in Section 3, Issues of this SoCG are not of material interest or relevant to the Environment Agency and therefore have not been subject of any discussions between the parties. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to the Environment Agency.

2. Record of Engagement

2.1.1 A summary of the meetings and correspondence that has taken place between the Applicant and The Environment Agency in relation to the application is outlined in **Table 2-1** below.

Table 2-1 - Record of Engagement

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
28/04/2024	Email	**Key Topics:** Biodiversity Net Gain (BNG) **Key Outcomes:** An introductory email was sent by the project team to the Environment to initiate discussions regarding Biodiversity Net Gain (BNG). This engagement served as the first point of contact to establish dialogue with the statutory body on BNG considerations.
29/05/2024	Email	**Key Topics:** Agreement Clarification **Key Outcomes:** The Environment Agency (Allison Craggs and Louise Foreman) emailed the project team, sharing their availability for a meeting and enquiring whether their involvement could be charged against the existing agreement with GCP.
12/06/2024	Email/Meeting	**Key Topics:** CSET - BNG discussion
10/09/2024	Email	**Key Topics:** CSET - BNG discussion **Key Outcomes:** Response to EA comments, stated these have been addressed and undertaken further investigation on BNG value on-site by removal of the existing weir in the River Granta.
24 - 27/06/2025	Emails	**Key Topics:** Service of Statement of Case The CSET project team requested service by email and asked for the address to issue it to. **Key Outcomes:** The EA provided a point of contact for the project team to issue the applicant's statement of case
05/11/2025	Email	**Key Topics:** Hydraulic Model Review – The EA Provided their review of the Hydraulic model submitted for the scheme. *It appears the model has been built carefully, with all key features included. Channel and structure data have been inherited from the original model. Though the report was downloaded and used; data was downloaded and used, the model appears to reference 2020 LiDAR based on the file name in the TGC. Clarification on this is required. Otherwise, the*

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		modelling for both the baseline and the scheme appears satisfactory. However, until the LiDAR source is confirmed and some additional comments are addressed, the model cannot be considered fit for purpose. The EA noted that their objection also includes a requirement to address f loodplain compensation to ensure there will be no increase in f lood risk elsewhere. **Key Outcomes:** The CSET team to review the comments provided on the model and update documents accordingly.
24/10/2025	Email	**Key Topics:** Responses to the model review were provided to the EA by the CSET project team, along with the updated modelling report that was updated to address comments raised by the EA in their review. The team also raised that the modelling data was incorrectly labelled **Key Outcomes:**
05/11/2025	Email	**Key Topics:** The EA responded to the CSET team, mentioning that they had reviewed the updated model review spreadsheet and model report and consider that these documents addressed all the previous issues raised. Therefore, the model is suitable for its intended use. The EA reiterated that our objection also includes a requirement to address f loodplain compensation to ensure there will be no increase in f lood risk elsewhere **Key Outcomes:** Modelling issues have been resolved – The EA still need to be provided with assurance that there is appropriate f loodplain compensation
18/11/2025	Email	**Key Topics:** The EA requested that an outline f loodplain compensation scheme should be provided in the Flood Risk Assessment (FRA) as well as the Flood Modelling Report. The EA acknowledged that the Flood Modelling Report indicates that the potential to provide f loodplain compensation The EA requested that a table be provided showing the volumes lost to the development and volumes

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		gained by the proposed compensation areas for each 100mm slice up to the 1% AEP flood level, including an appropriate allowance for climate change. This information should be included in a revised FRA to demonstrate that adequate floodplain compensation can be provided. **Key Outcomes:** Request to provide an updated FRA, which will allow for the objection to be withdrawn
15/01/2026	Email	**Key Topics:** CSET2 Flood Modelling Review - removal of objection **Key Outcomes:** The EA emailed the project team confirming that the Agency is able to remove its objection regarding the CSET2 Flood Modelling Review and will inform TIPU.
11/03/2026	Email	**Key Topics:** EA removal of objection - other comments **Key Outcomes:** The CSET project team contacted the Environment Agency, following the formal withdrawal of the Agency's objection. The email sought to address remaining points in the EA's letter, including proposed conditions and further advisory notes. The project team proposed capturing these matters within a Statement of Common Ground (SoCG) to ensure clarity for the Inspector and requested a meeting within the next one to two weeks to discuss them.
29/04/2026	Teams Meeting	**Key Topics:** EA SoCG Discussion **Key Outcomes:** The CSET team met with the Environment Agency team to discuss the EA representation and withdrawal conditions received from the EA and agree positions under a SoCG.
04/06/2026	Email	**Key Topics:** Circulation of the final draft SoCG and final comments requested **Key outcomes:** Final comments received from the EA on 22 June 2026
23/07/2026	Email	**Key Topics:** Circulation of the final SoCG document including a note pertaining to the status of the draft planning conditions which are subject to amendment/adjustment over the course of the public inquiry process

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
08/10/2026	Meeting	**Key Topics:** Discussion on the likely required dewatering works during the construction of the CSET2 bridges across Hobson's Conduit and the River Granta, and identify any concerns. As well as amending the SoCG and supply of the ES Addendum. **Key outcomes:** The ES Addendum is a starting point but doesn't necessarily identify all the measures that may be required. It was agreed that at the detailed design/permitting stage further work will be carried out to identify the mitigation required. Additional wording to be provided for the SoCG.
09/10/2026	Email	Agreement of the additional wording for the SoCG in relation to issue 16 – Abstraction and Protected Rights
12/10/2026	Email	**Key Topics:** Re-circulation of the final signed SoCG document featuring agreed additional wording against issue 16.

2.1.2 It is agreed that this is an accurate record of key meetings and other forms of consultation and engagement undertaken between the Applicant and The Environment Agency in relation to issues addressed in this SoCG

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3. Issues

3.1 Issues agreed, not agreed or under discussion

3.1.1 Table 3.1.1 below details the issues which have been agreed, not agreed or are under discussion between the Applicant and The Environment Agency.

Table 3-1 – Issues

Issue No.	Issue	Document Reference	The Environment Agency's Position	Applicant's Position	Status
1.	Technical Comments – Flood Risk Modelling	CD2-OBJ-465	EA are unable to undertake a detailed review of the model that has been submitted to us. The model report should be updated to include a more detailed justification for not updating the hydrology; the relevant paragraph in the report (paragraph 8.2.16) should include the analysis undertaken as part of the study, which we have discussed via email. Given the difference between the peak flows in the two studies are ~2-3 cumecs, which equates to around a 15% uplift in peak flows, a sensitivity test should be carried out to assess how much difference this makes to the model outputs at the site of interest. A 20% flow sensitivity test is usually asked for as part of flood modelling uncertainty analysis; this could be used to demonstrate the level of uncertainty in the model outputs, including the relevant 1% AEP climate change flood level used in the floodplain compensation calculations. If there is a higher degree of uncertainty or difference within this sensitivity testing, a significant net gain in floodplain compensation should be provided to address the uncertainty in the impacts from the proposed changes and to ensure there is no increase in flood risk elsewhere.	Flood risk modelling files have been submitted to and reviewed by the EA. The flood modelling report has been updated [CD1-10.24a] and submitted to the EA who have reviewed and confirmed that the objection relating to the flood risk modelling has been addressed and withdrawn. A new draft condition has been added to the Deemed Planning Permission as follows: ***Flood Compensation Scheme*** *The development hereby permitted must not be commenced until such time as a detailed floodplain compensation scheme has been submitted to, and approved in writing by, the local planning authority.* *The scheme must provide suitable flood storage for any flood waters that would be displaced by the authorised development in the 1% annual exceedance probability (AEP) event, including a 19% allowance for climate change.* *The floodplain compensation areas must be within the red line boundary of the site, in proximity to the Stapleford and Babraham viaducts, as shown on Figure A8.1.13 of the approved Flood Risk Assessment, ref. CSET-10-23, dated December 2025.* *The scheme shall be fully implemented and subsequently maintained, in accordance with the scheme's timing/phasing arrangements, or within any other period as may subsequently be agreed, in writing, by the local planning authority.* ***Reason:*** *To ensure there is no increase in flood risk elsewhere due to a loss of floodplain storage in accordance with NPPF paragraph 181.*	Agreed
2.	Technical Comments – Flood Risk Assessment	CD2-OBJ-465	The EA consider that an outline floodplain compensation scheme should be provided in the FRA to demonstrate that adequate land is available within the red line boundary to provide the required floodplain compensation. This information is required to demonstrate that the proposed development passes the second part of the Exception Test – i.e. the development will not increase flood risk elsewhere and, where possible, will reduce flood risk overall.	The FRA has been updated [CD1-10.23a] and submitted to the EA who have reviewed and confirmed that the objection relating to the FRA has been addressed and withdrawn.	Agreed
3.	Technical Comments – Contamination Assessment	CD2-OBJ-465	Environment Agency note that an extensive contamination assessment and intrusive investigation has been undertaken along the intended route, which is largely agricultural farmland with some potentially contaminative land uses such as railways, roads, historic gravel and chalk pits, mining and industrial activities. Soil sampling identified only one exceedance of the adopted GAC, and Environment Agency agree that this isolated exceedance is unlikely to pose a wider contamination risk. Groundwater and soil leachate sampling identified metal and hydrocarbon concentrations at several locations exceeding EQS and DWS. The report concludes these exceedances do not appear to represent a significant	The EA position is noted and issue agreed.	Agreed

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			groundwater risk and recommends a watching brief and a piling risk assessment to protect the sensitive groundwater environment, including Principal aquifers, SPZs and watercourses. Environment Agency support implementing these steps.		
4.	Technical Comments – Drainage Strategy	CD2-OBJ-465	EA understand that the drainage strategy proposes discharging surface water to ditches and watercourses. As highway runoff can be contaminated, EA support the inclusion of pollution prevention measures such as f ilter strips and drains, swales, attenuation basins and ponds, and note that the applicant may also wish to consider oil interceptors. The FRA and Drainage Strategy state that inf iltration drainage features are not included due to insufficient shallow inf iltration rates. Given the potential for contaminated runoff, EA agree with this approach on a groundwater protection basis. If the design changes to include inf iltration, the applicant must provide appropriate details. Any soakaways or inf iltration SuDS must comply with statements G1 and G9–G13 of the EA Groundwater Protection Position Statements, must be constructed in line with good practice (including CIRIA C753 SuDS Manual and guidance on the Susdrain website), and must not be placed in contaminated ground where inf iltration could re-mobilise contaminants. All inf iltration SuDS must maintain a minimum 1.2 m clearance above peak seasonal groundwater levels, and only clean roof water may be discharged directly to inf iltration SuDS or watercourses. The reports note higher inf iltration rates f rom depths of 3.3 m onwards and suggest that deep inf iltration may be considered. EA note that deep inf iltration systems (>2.0 m below ground level) are not routinely acceptable and would only be considered if all criteria in G9 of the Groundwater Protection Position Statements are fully met.	Draft Condition 12 of the Deemed Planning Permission requires drainage details to be submitted to the Local Authority for written approval prior to the commencement of works. Submitted details must align with the Drainage Strategy, FRA, and ES. The drainage design will capture road run-off either with a solution of oil interceptors or reedbed systems – similar to that used on the local network in accordance with the CIRCA C753 requirements as stated.	Agreed
5.	Technical Comments – Piling	CD2-OBJ-465	It is understood that piling is intended as part of the works for the Bridges; piling and other penetrative foundation methods have the potential to adversely affect groundwater conditions. This may include pollution, increased turbidity, mobilising contaminants and creating preferential pathways. EA recommend that the applicant provide appropriate details of foundation designs prior to the commencement of works.	Draft Condition 7 Piling Risk Assessment, in the Deemed Planning Permission [CD1-14], requires the Applicant to submit a Piling Risk Assessment to the Local Authority prior to commencement of the development. The Condition prohibits any phase of works, that requires piling, f rom commencing until the Local Authority has approved the Piling Risk Assessment for the particular phase. In general, the contractor will submit his CEMP and method statement with control points to ensure that the piling works will not contaminate the surrounding area and impact the ground water conditions.	Agreed
6.	Biodiversity - Planning Conditions	CD2-OBJ-465	EA do not object to the planning application subject to the inclusion of the following conditions: • Condition 10 – Construction Ecological Method Statement (CEMP) • Condition 11 – Temporary crossing over the Granta (habitat restoration) • Condition 20 – LEMP • Condition 21 – BNG EA request to be consulted on any variation or discharge of these conditions. Within the CEMP (Condition 10) EA expect the following to be addressed: • Riparian planting adjacent to culverts – planting on both banks must be properly established to ensure water vole movement is not restricted. Pre-planted coir rolls or mats should be used to provide immediate cover. • Mammal ledges and ramps in culverts – mammal ledges in box culverts should include ramps on both sides to allow access at varying water levels. When details are submitted under the protective provisions in Schedule 12 Part 7 and/or the discharge of Condition 11, EA expect the following: • Temporary bridge crossings – as these will be in place for many months, they should allow mammal access along both riverbanks by setting back abutments, or by providing mammal ledges and ramps. This is to maintain mammal commuting routes along the river corridor and reduce potential mortality f rom animals being forced away f rom the river corridor.	Draft Condition 4 Construction Environmental Management Plan, in the Deemed Planning Permission [CD1-14], sets out the requirements for a site wide Demolition and Construction Environmental Management Plan (DCEMP) and requires formal written approval of the DCEMP by the Local Authority prior to the commencement of any development. Draft Condition 11 Temporary Crossing Over the River Granta, in the Deemed Planning Permission [CD1-14], requires detailed habitat restoration plans to be submitted to the Local Authority. Development cannot commence until the Local Authority has approved the detailed habitat restoration plans in writing. Draft Condition 20 Landscape Ecological Management Plan, in the Deemed Planning Permission [CD1-14], requires the Applicant to submit a Detailed Ecological Design informed by the LEMP, to the Local Authority for their written approval prior to development commencing. Draft Condition 21 Biodiversity Net Gain, in the Deemed Planning Permission [CD1-14], requires the BNG assessment to be updated and submitted to the Local Authority for written approval prior to any development commencing. Riparian planting adjacent to culverts will be specified within the Detailed Ecological Design, secured by Draft Condition 20 of the Deemed Planning Permission [CD1-14].	Agreed

Issue No.	Issue	Document Reference	The Environment Agency's Position	Applicant's Position	Status
				The interface detail for mammal ledges with watercourses and the need for any ramps will be agreed through the Detailed Ecological Design secured through Draft Condition 20 in the Deemed Planning Permission [CD1-14], Draft Condition 11 Temporary Crossing Over the River Granta, requires the Local Authority to approve, in writing, the detailed habitat restoration plans which must include site levels, elevations, and sections. The requirement for continued mammal access is noted, and it is assumed that the Local Authority will not approve in writing the detailed habitat restoration plans unless they are satisfied that the plans maintain mammal commuting routes.	
7.	Culvert specifications (Advice to applicant)	CD2-OBJ-465	Water voles are present at both the northern and southern ends of the scheme, and otters travel widely along water networks. EA therefore recommend that mammal ledges are installed in all culverts to maintain connectivity for water voles, support population expansion, and provide safe movement routes for otters. If mammal ledges are not provided in all culverts, then culverts must comply with the Water Vole Mitigation Handbook specifications: • Oversized box culverts (up to 30–35 m long) with >1 m headroom above normal water levels; or • Circular culverts (1200 mm diameter) up to 10 m long with >300 mm headroom. These measures are required to avoid fragmenting or restricting local water vole populations.	Structure 1 is a proposed box culvert carrying the busway and maintenance track across a drainage ditch which discharges into Hobson's Conduit. Otter and water vole surveys undertaken for the EIA identified a low potential for the ditch to be used by either species due to the ditch being dry, and the ditch does not provide connectivity to other suitable areas of habitat. It was therefore not deemed necessary to include mammal ledges within the culvert. The height of the box culvert aperture is 1 m, which is the maximum available with the topographical constraints. All other culverts have mammal ledges included.	Agreed
8.	Mink trapping contribution	CD2-OBJ-465	EA believe the project could support local water vole populations by contributing to a local mink trapping initiative, such as through the Water Life Recovery Trust.	The applicant is not aware of existing mink trapping activities in the Cambridge area; however, water vole activity has been recorded within the scheme area since 2020. Therefore it can be concluded that the water vole population is currently being maintained and that predation from mink is not a concern. Should the Contractor observe this species, they will record its location and inform the local authority ecology lead to provide guidance and direction on capturing and relocating.	Agreed
9.	Water vole displacements	CD2-OBJ-465	EA believe additional water vole surveys are required to establish whether sufficient habitat is available for displaced water voles in close proximity to the working area (as per CSET 10 35 00 Appendix 10.5 Otter and Water vole surveys Page 29 Advice (water voles)).	The reference to advice was given in the water vole report produced in 2022. Further surveys were undertaken in late 2025 and more surveys will be undertaken in 2026. Surveys are normally required before a contractor can lawfully occupy and begin works on site and this will be a requirement set out in the contractor's requirements.	Agreed
10.	Water vole habitat creation	CD2-OBJ-465	Creation of new water vole habitat should take place prior to works on the water courses commencing, so that it has time to mature.	Where possible planting and habitat management will take place at the earliest possible opportunity subject programming and the risk of disturbance from construction activities.	Agreed
11.	Post construction monitoring	CD2-OBJ-465	EA want post-construction monitoring of water vole populations either side of new culverts to establish whether water voles are moving through culverts. If water voles are not found to be moving through culverts, additional mitigation measures may be required.	Post construction monitoring is acceptable; however, further mitigation measures would be constrained by engineered works.	Agreed
12.	Further survey work	CD2-OBJ-465	Water vole and otter surveys should be updated well in advance of construction starting. This is because water voles are a mobile species and as previous surveys have shown, populations are dynamic and may be found in previously unoccupied habitat. Otters may have established new resting sites or holts since the previous surveys.	The reference to advice was given in the water vole report produced in 2022. Further surveys were undertaken in late 2025 and more surveys will be undertaken in 2026.	Agreed

13.	Biodiversity Net Gain	CD2-OBJ-465	Appendix 10.12 (BNG assessment) and Appendix 10.13 (BNG scenario modelling) indicate that a 14% BNG for rivers can be achieved on site. EA understand that weir removal is still being investigated, as this could allow 20% BNG to be achieved.
			If weir removal is not feasible, it may be preferable to achieve 14% on-site BNG and purchase the additional 6% river units, rather than purchasing the full 20% off-site, so that some benefit remains local.
				To confirm the watercourse BNG position as of the January 2025 update to the BNG reporting the:
				• Baseline WU by Watercourse type:
				  ○ River Granta; 10.6 units – Priority Habitat
				  ○ Hobson's Brook; 1.19 units – Other River & Streams
				  ○ 8.93 units - Ditches
					Agreed

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				• Post-development WU value is 12.43 units
				  ○ River Granta 8% increase from baseline
				  ○ Hobson's Brook 7.6% increase from base
				  ○ Ditches 20.5% increase from baseline
				As a result of the scheme there are no net losses for any of the Watercourse types and the overall net gain is 9.89% (or 2.07 units) i.e. Trading Rule 1 is met. This leaves a shortfall of in net gain approximately 10% (or 2.12 units) against the baseline, based on the 20% programme wide GCP target. Since Rule 1 is met the required units can be derived from any watercourse type i.e. ditches could be the sole type used in securing the 20% target.
				As reported in the BNG January 2025 update, further investigation of the weir at the proposed River Granta (Babraham) Crossing has identified that the structure is still in operation and is used to raise river water levels for a licenced abstraction for agricultural irrigation. Correspondence with the owner (Chevely Park Limited) has identified that whilst the landowner is aware of the benefits of removing the weir, they would still require a source from the River Granta to fill the irrigation catch pit. Uncertainty as to whether this is likely to require construction of a similar structure, coupled with the uncertainty around the practicalities of addressing existing watercourse encroachments in the River Granta has meant the project has looked at off-site opportunities focused on watercourse habitat.
				We have been working collaboratively with the Greater Cambridge Partnership (GCP) and local authority ecologists to explore and progress opportunities for off-site Biodiversity Net Gain (BNG) delivery through watercourse restoration projects within Cambridge. This engagement has included technical review and discussion of BNG modelling for several city watercourse schemes, including channel restoration at Sheep's Green/Coe Fen, de-culverting at Midsummer Common, and potential future works on Hobson's Conduit and Hobson's Brook. Through these discussions, we are supporting the GCP understand the likely BNG yield, limitations imposed by spatial risk penalties, and how schemes could be designed or replicated elsewhere to improve BNG delivery.	

14.	Fisheries	CD2-OBJ-465	The river is inhabited by both salmonid and rheophilic coarse species, and works should therefore take place outside salmonid and coarse fish spawning times. Disturbance to spawning fish is an offence under the Salmon and Freshwater Fisheries Act. The river will be susceptible to sediment loading because these species depend on clean gravels for successful spawning, so care must be taken to ensure that no sediment from runoff or ground works enters the channel. Future concerns of pollution on this sensitive river have been minimised through the use of SuDS and settlement ponds, although these will require regular maintenance to ensure they are working effectively at all times.	The Contractor will apply for and obtain all relevant Flood Risk Activity Permits (FRAPs) and any other statutory consents required prior to undertaking works within or adjacent to the River Granta. All works will be planned and implemented in accordance with permit conditions and Environment Agency requirements, including agreed timing restrictions and method controls, to minimise the risk of disturbance to spawning coarse and salmonid fish. The Contractor will also adopt appropriate good practice measures for the management of surface water run-off from the construction area to protect spawning habitat quality, implemented through relevant working method statements and guided by the Construction Environmental Management Plan (CEMP) and Code of Construction Practice (CoCP), to minimise pollution risk and protect the receiving water environment, in line with consenting requirements. These are secured through Draft Condition 4 Construction Environmental Management Plan, in the Deemed Planning Permission [CD1-14], Sustainable Drainage Systems (SuDS) features, including settlement ponds, will be operated and maintained in accordance with the agreed maintenance regime to ensure their continued effective performance. Routine inspection, removal of accumulated sediments, and maintenance of inlet and outlet structures will be undertaken as required to ensure that the SuDS and settlement ponds function appropriately, maintain designed water quality and flow control benefits, and effectively manage surface water throughout the operational period of the scheme.	Agreed

Issue No.	Issue	Document Reference	The Environment Agency's Position	Applicant's Position	Status
15.	Water Resources	CD2-OBJ-465	The location of this development is in an area of serious water stress. Any water required as part of the construction and operation and its source needs to be considered. Water availability is dependent on the catchment. Most water related construction activities, including dewatering and dust suppression are licensable activities and as such, early consideration should be given to where the water can be sourced from. New consumptive groundwater licences are not available, and surface water is restricted to high flows only.	It is acknowledged that the Scheme is located in an area of extreme water stress. During construction, the Contractor will have due regard to the water efficiency requirements of South Cambridgeshire Local Plan Policy CC/4 Water Efficiency (SCLP CC/4) and will set out the necessary measures to minimise water consumption in the Demolition and Construction Environmental Management Plan (DCEMP). Draft Condition 4 of the Deemed Planning Permission requires the Contractor to submit a detailed DCEMP to the Local Authority for their written approval prior to works commencing. During operation, a small amount of potable water will be required to service the Travel Hub, and it is noted that the detailed design will need to comply with the requirements of SCLP CC/4. Draft Condition 16 of the Deemed Planning Permissions requires details of the Travel Hub to be submitted to and approved in writing by the Local Authority.	Agreed
16.	Abstraction and Protected Rights	CD2-OBJ-465	Development of the busway should not detrimentally affect local water features, including streams, ponds, lakes, ditches or drains, or licensed and unlicensed abstractions. Any disruption to abstraction licences during construction and operation must be avoided or mitigated. The proposals are in proximity to Nine Wells Local Nature Reserve, and consideration should be given to any temporary or permanent effects during construction and operation, including impacts on water levels and the flow of surface and groundwater to the site. Abstractor information and impacts must be fully understood prior to construction, and engagement is encouraged to establish this. Identified licences must not be affected by construction or operation. Any impacts on water quality, drainage or hydrological flow that could affect local or downstream licence holders must be avoided. The impacts of the construction and operation of the Busway on these abstractions should be investigated, and if there are likely to be impacts, derogation agreements will need to be sought in order to support any abstraction licence applications. Certain private and small water supplies do not require a licence to abstract water; therefore, we do not necessarily hold extensive records of these. The locations of private domestic sources may be held by the local authority on the register required by Regulation 14 Private Water Supplies Regulations 2016.	As set out in the response to issue no. 15, water consumption will be minimised in the first instance. The majority of water consumption for the Scheme will be during construction, notably for the concrete plant production. The applicant will ensure the appropriate agreements are in place to use local piped water sources, but where this is not possible, water will be brought in by a bowser truck to ensure that concrete is free from contaminants. It is not anticipated that any water abstractions will be required at this stage, but should the Contractor deem abstraction necessary, this would only be undertaken under the appropriate licence and in strict accordance with any restrictions and conditions imposed by the licensing authority. The Scheme has been amended in the vicinity of Nine Wells so that the previously proposed Ecological Pond 3 is now removed entirely, and Attenuation Pond 1 has been moved closer to the busway alignment. The removal of Ecological Pond 3 will avoid any ground disturbance in the vicinity of Hobson's Conduit which could disrupt lateral flows of ground water to the watercourse. Ecological Pond 3 was originally intended to provide mitigation for water voles. This mitigation will now be implemented in the form of improving habitat quality along the southern bank of Hobson's Conduit by removing the existing scrub and exposing the bank. Relocating Attenuation Pond 1 and aligning it with the busway will also minimise any lateral ground water flows to the watercourse in this area. The ES addendum has assessed the predicted effects of temporary groundwater abstraction related to the construction of the foundations for the three bridges. Mitigation measures have been identified against the risks set out in the ES addendum. It is noted that the detailed design and construction method is not currently known and it is possible that the works would fall under Regulation 5 of 'The Water Abstraction and Impounding (Exemptions) Regulations 2017'. This will be determined at the detailed design stage. Should the works exceed the criteria set out in Regulation 5 of 'The Water Abstraction and Impounding (Exemptions) Regulations 2017', then it is agreed that an abstraction and discharge licence will be required for any dewatering works at these locations and that these will be applied for post consent. Environmental risks and any required mitigation measures will be reviewed and updated once the detailed design and construction method is known and conditioned into the required permits to ensure that significant effects will not occur to either groundwater resources, or the receiving watercourses to which abstracted water will be discharged to.	Agreed
17.	Construction and Operational Water Supplies	CD2-OBJ-465	The water used during the construction phase needs to be considered separately from the water required during the operational phase. Early consideration should be given to where the water will be sourced from. If water is to be sourced from water companies, engagement is required to ensure this	[Also see issue 15] The main demand for water supply will relate to the concrete plant. The advice provided by the EA is appreciated and has been noted. Main works construction is not likely to start until 2028. In the meantime, the applicant, and	Agreed

Issue No.	Issue	Document Reference	The Environment Agency's Position	Applicant's Position	Status
			supply has been considered in their draft or published WRMP 2024, and this should be evidenced. Any assessment should identify where the water supply will come from, as transfer schemes may mean that additional demand is not abstracted within the local catchment and impacts may extend beyond the project area. Cambridge Water Company (CWC) is heavily reliant on demand management measures until new sustainable supplies are developed. We support the inclusion of condition 23 and would encourage the developer to go further than the 2 BREEAM credits. Additionally, CWC will be applying an enhanced assessment of new non-household connection requests from 2025 which means for connection requests above 20 m3 /day and where the primary use is not for domestic purposes (e.g. sanitation, cooking etc), it is likely that the company will be not be able to facilitate connection and supply to these developments until 2032. We advise that the project engages with Cambridge Water to ensure that any required water supply can be supplied.	in due course the contractor, will examine all the possible options with the utility organisations in order to see if the water needs can be met from existing available sources. Details of the plant, including a viable solution for this issue, will be contained in the Construction Management Plan. Ultimately the contractor will need to either seek the relevant approval to use existing water supplies, or otherwise water will be brought in by road.	
18.	Licencing Requirements	CD2-OBJ-465	Activities that may temporarily and/or permanently alter surface and groundwater hydrological regimes (e.g. water course diversion, over-pumping, dewatering, surface and subsurface activities/instillations) should consider whether and if so what type of licences/permits (abstraction, transfer, impoundment, discharge) will be required to facilitate these activities. EA would encourage engagement with them well in advance of the construction activities to determine a licencing/permit plan for the various phases of the project. Dewatering may need to demonstrate that it is non consumptive to the local environment for it to be licenced. Any temporary and/or permanent field drains that affect dewatering of the site need to consider the effect on the hydrological regime and impact on protected rights, including designated nature sites. Where licences/permits are required, an enhanced pre-application should be submitted to allow adequate time for determination.	As set out in Chapter 2 of the ES, it is not anticipated that there will be a need for any dewatering during construction. There may need to be temporary local disruption to surface waters due to the installation of the drainage outfalls, and box culverts. These works will be undertaken under licence and in strict accordance with any conditions or restrictions imposed by the relevant licensing authority.	Agreed
19.	Management of Waste during Development	CD2-OBJ-465	Developers must ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations is clear. Excavated materials recovered through a treatment operation may be re-used on site under the CL:AIRE Definition of Waste Code of Practice, subject to certain conditions being met. However, contaminated materials that are / must be disposed of are waste and therefore subject to waste management legislation which includes: Duty of Care Regulations 1991, Hazardous Waste (England and Wales) Regulations 2005, Environmental Permitting (England and Wales) Regulations 2010, The Waste (England and Wales) Regulations 2011 If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12 month period the developer will need to register with us as a hazardous waste producer.	The Contractor will at all times look to Recycle all materials under the WRAP scheme and he will need to meet the Local conditions and waste requirements under the 1991 Hazardous waste act. The contractor will submit weekly / Monthly data sheets to the Client detailing all material types encountered and all contaminants treated or disposed of in accordance with the relevant regulations. If they encounter hazardous waste which is unlikely on a scheme like this will need to be identified early in the process and the Client and contractor informed in accordance with the Relevant regulations. Draft Condition 4 requires the Contractor to submit a DCEMP to the Local Authority for written approval prior to any works starting. The DCEMP will include all waste management policies and procedures to be implemented by the Contractor. Draft Condition 8 sets out the procedure for any encountered contaminated land.	Agreed
20.	Pollution Prevention (Advice)	CD2-OBJ-465	Materials and chemicals likely to cause pollution should be stored in appropriate containers an in accordance with relevant guidance. Any above-ground facilities for the storage of oils, fuels or chemicals shall be sited on impervious bases with impervious bund walls. The volume of the bunded compound should be at least equivalent to the capacity of the tank plus 10%. All filling points, vents, gauges and sight glasses must be located within the bund. The drainage system of the bund shall be sealed with no discharge to any watercourse, land or underground strata. Associated pipework should be located above ground and protected from accidental damage. All filling points and tank overflow pipe outlets should be detailed to discharge into the bund. Prior to being discharged into any infiltration system, watercourse or surface water sewer, all surface water drainage from areas susceptible to oil contamination should be passed through an oil separator (or equivalent device) with appropriate capacity and performance. Areas susceptible to oil	Draft Condition 4 requires the Contractor to submit a DCEMP to the Local Authority for written approval prior to any works starting. The DCEMP will include the requirements for how the Contractor and all sub-contractors will store, use and control all fuels, chemicals, and any other hazardous materials. All mitigation measures required by the Environment Agency will be set out in the DCEMP and implemented.	Agreed

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			contamination include: lorry parks; car parks with a surface area exceeding 800m2 or with 50 or more parking spaces; vehicle maintenance areas; refuelling facilities; roads. Roof water shall not pass through the interceptor/device. Appropriate procedures, training and equipment should be provided so that environmental pollution from routine operations or incidents on the site can be prevented. The Environmental Permitting Regulations make it an offence to cause or knowingly permit any discharge that will result in pollution of groundwater or surface waters.		

Note: Where there is reference to the content of the planning conditions and their associated conditions numbers, these are subject to amendment/adjustment over the course of the public inquiry process. This SoCG refers to the planning conditions as they currently stand as of July 2026.

Signed on behalf of Cambridgeshire County Council:

Name:
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Authorised Signatory

Dated:.....14/10/26.....

Signed on behalf of the Environment Agency:

Name:...Liam Robson.....

Authorised Signatory

Dated:.....14/10/2026.....