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PINS Reference: WA010004
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27th November 2025

Fens Reservoir Project Team
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Electronic submission only

Dear Sir / Madam

Application by Anglian Water and Cambridge Water for an Order Granting Development Consent for the Fens Reservoir (Ref: WA010004): Response to Phase Three Non-Statutory Consultation (NSC-3)

Introduction, Proposed Development and Response

1. I am writing on behalf of South Cambridgeshire District Council in response to the Phase Three Non-Statutory Consultation (NSC-3) for the Fens Reservoir Development Consent Order (DCO) which opened on 15 October 2025 and invites comments until 10 December 2025.

2. The proposed development qualifies as a Nationally Significant Infrastructure Project (NSIP) in accordance with Sections 14, 27 and 28 of the Planning Act 2008 (as amended). This will require an application for a Development Consent Order (DCO) to be submitted to the Secretary of State, in accordance with Section 31 of the same Act.

3. South Cambridgeshire District Council (herein referred to as *SCDC* or the Council) understands that it would act as one of the host authorities for the Fens Reservoir DCO, in accordance with Sections 42 and 43 of the Planning Act 2008. This is because elements of the proposed development, including pipes and associated infrastructure connecting to the new reservoir will be located within the district.

4. The Council acknowledges that the proposed Fens Reservoir will provide additional strategic-scale water supply to the East of England, including Greater Cambridge, which is supplied by Cambridge Water. The Council accepts that the infrastructure would make a significant contribution to reducing the need for potable water to serve the Greater Cambridge area being delivered through abstraction from the chalk aquifer in Greater Cambridge. Against a growing need arising from forecast economic and

housing growth in the area, increasing abstraction presents a risk of deterioration to the ecology and amenity of local watercourses.

5. Notwithstanding the above, the Council has reviewed the consultation material and provided detailed technical comments, which are appended to this letter in **Table 1.**

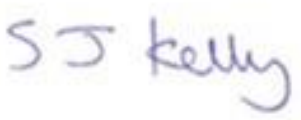
Next Steps

6. The Council looks forward to working with Anglian Water and Cambridge Water to address the key points highlighted in this response ahead of the Statutory Consultation, which is anticipated to take place in Summer 2026.

7. The Council also looks forward to having initial discussions in respect of the Statements of Common Ground (SoCG) and the Principal Areas of Disagreement (PADSs) in the coming months.

8. I trust nevertheless that in the meantime; these comments will be taken into account by the applicants but please do not hesitate to contact the Greater Cambridge Shared Planning NSIP/Major Infrastructure Delivery Team (cc'ed) if you require further clarification on any of the matters raised.

Yours faithfully



Stephen Kelly

Director of Planning & Economic Development

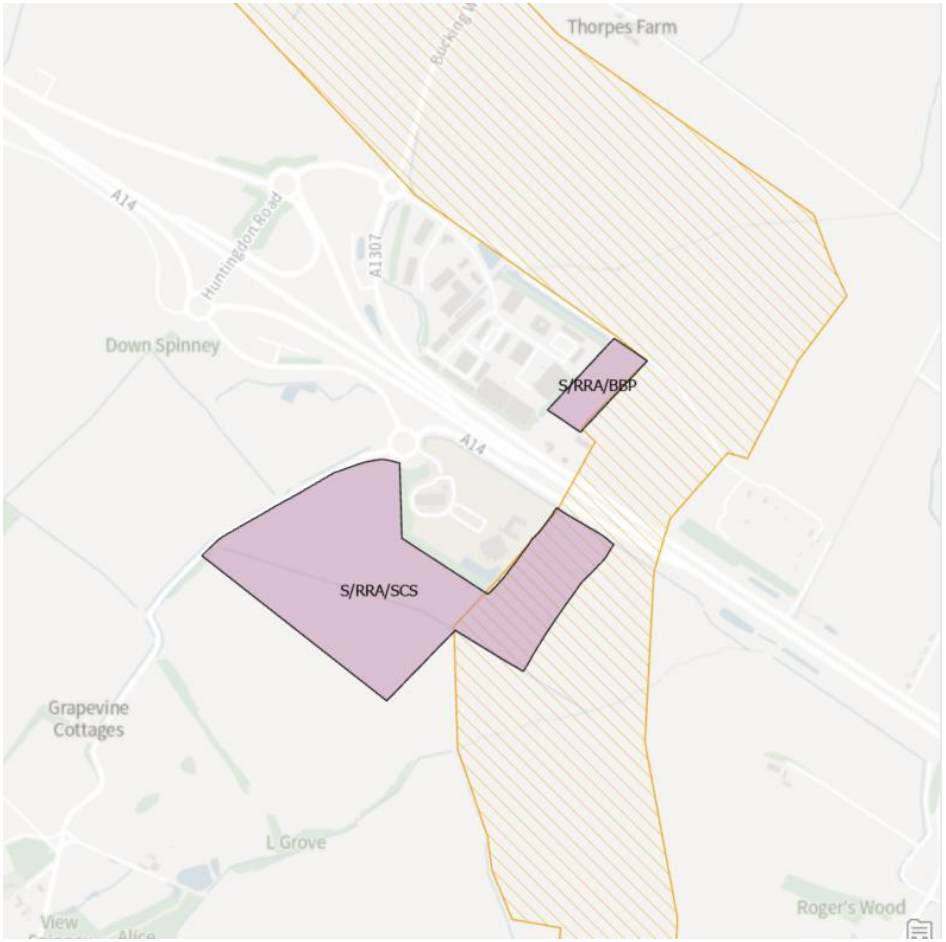
On behalf of: South Cambridgeshire District Council

cc. NSIP/Major Infrastructure Delivery Team (NSIPS@greatercambridgeplanning.org)

Application by Anglian Water and Cambridge Water for an Order Granting Development Consent for the Fens Reservoir (WA010004)

TABLE 1: Response to Phase Three Non-Statutory Consultation (NSC-3)

TECHNICAL AREA/TOPIC	COMMENTS
1. Pipeline Realignment and Impact on Draft Local Plan Allocations	The consultation documents show a realignment of the southern section of the Fens Reservoir to Madingley pipeline, extending from Holywell (south of the A14) to Madingley, to achieve better alignment with the proposed Grafham to Rede pipeline route. It is noted that this amendment avoids the need for an additional trenchless crossing beneath Mare Fen Local Nature Reserve and removes the requirement for construction vehicles to travel through Swavesey village. It also follows more favourable ground conditions, thereby reducing potential peat disturbance. While the coordinated consideration of both pipeline projects is welcomed, the re-aligned Fens Reservoir pipeline now crosses through draft site allocations identified in the *Draft Greater Cambridge Local Plan (2025)* which is being consulted upon between 1 December 2025 and 30 January 2026 (Regulation 18 stage). Notably, the revised route intersects two proposed site allocations within South Cambridgeshire District: • Land at Buckingway Business Park (Policy S/RRA/BBP) – the pipeline corridor slightly intersects this proposed allocation for employment uses. • Land to the south of Cambridge Services, A14 (Policy S/RRA/SCS) – the corridor crosses part of this proposed allocation for employment uses and lorry parking.

	Further details about these sites can be found within the Draft Greater Cambridge Local Plan[1] and the plan below shows an extract from the Draft Greater Cambridge Local Plan Policies Map with the allocation sites, and the pipeline alignment plans for reference. 

[1] Appendix A - Greater Cambridge Local Plan - Part 5 - Site allocations-compressed.pdf, p381-384

	The Council seeks to ensure that the proposed pipeline route does not compromise the deliverability of these sites for their intended uses. **Summary of Requirements:** • The Applicant should consider the route of the revised pipeline alignment in relation to all draft and adopted Local Plan site allocations. GIS mapping of the draft Local Plan site allocations can be provided. • A meeting is requested to discuss the potential impacts of the realignment on these and any other local plan sites, including implications for deliverability, phasing, and access. • Where necessary, the Applicant should explore design or routing refinements to minimise conflict with adopted and draft allocation development land.
2. Outflow to Bin Brook	The revised plans show a new pipeline corridor for overflow infrastructure from the proposed Madingley service reservoir to discharge into the existing Bin Brook watercourse, located south of the service reservoir site. The drainage teams for both South Cambridgeshire District Council (SCDC) and Cambridge City Council (CCC) have not been involved in this project to date, as this remit usually falls under the Lead Local Flood Authority (LLFA) and the Environment Agency (EA). However, officers from both Councils have been asked to review the revised plans, as this represents a new element of the proposals and could have specific implications for both SCDC, with the initial discharge point located in the district and for CCC, where the impacts will occur downstream. It is noted that the current plans are high-level, but the following comments are made for consideration at later stages: • No detail is currently provided on how often the outfall will need to be utilised for draining down and whether this could have impacts on maintenance frequency of the brook, this water is over and above what will be produced naturally in the catchment. • Bin Brook is a highly responsive (“flashy”) catchment, and careful consideration must be given to ensure the proposals do not inadvertently increase flood risk. There are notable pinch points and structures

	along the brook as it crosses from the administrative area of the District into the City, particularly where water backs up under the highway at Brook Lane, near Manor Farm, Coton. It should be noted that properties in this area have experienced serious internal flooding events in the past; therefore, the introduction or potential for increased upstream flows must be carefully assessed. As such, the discharge rate will need to be agreed, and the impact of any additional water fully evaluated. **Summary of Requirements:** • Detailed hydrological modelling and operational information should be provided to clarify discharge frequency, volumes, and downstream effects. • The Applicant should engage directly with both SCDC and CCC drainage teams to agree the discharge rate, maintenance implications, and required mitigation. • Updated mapping should be provided showing the proposed outfall in relation to key local flood risk infrastructure.
3. Cambourne to Cambridge Busway TWAO	The proposed overflow infrastructure from the proposed Madingley service reservoir to discharge into the existing Bin Brook watercourse is directly located on the Cambourne to Cambridge Busway route, a Greater Cambridge Partnership (GCP) Transport and Works Order (TWAO) project. At the date of writing, the Cambourne to Cambridge Busway has been submitted to the Department of Transport and is currently subject to public inquiry examination. It is noted that the consultation documents refer to this route as “evolving”; however, the scheme is no longer being developed in route-selection terms. While it is not yet consented and could, in theory, be refused or modified by the Secretary of State, the alignment currently before the Inquiry represents the definitive route proposed by the promoter (the GCP). Therefore, for the purposes of the Fens Reservoir DCO, the Cambourne to Cambridge route and its Order limits should be treated as fixed, and any overlap with the reservoir boundary should be acknowledged accordingly. The Applicants should, in the Council’s view, demonstrate that they have considered potential impacts of the proposal on this transport project specifically the impacts of the proposed pipeline and works to the service reservoir in the immediate area.

	Summary of Requirements: • The Applicant should confirm coordination with the GCP and demonstrate that the design avoids any physical or functional conflict with the TWAO scheme.
4. The Cambridge Greenbelt	The associated infrastructure, as described within the consultation documents, lies within SCDC's administrative area and is partly located within the Cambridge Green Belt, in particular the 'Service Reservoir' is wholly within the greenbelt. It is therefore, in the Council's view, important to justify why a green belt location for the service reservoir as well as the associated infrastructure is considered to represent the best option. The Council also recognises that the project is included in both Cambridge Water's and Anglian Water's draft Water Resources Management Plans. Accordingly, the need for the scheme is treated by the National Policy Statement for Water Resources Infrastructure (NPSWR) as demonstrated (see para 1.4.5). However, the NPSWR also confirms at section 4.10 that where projects constitute inappropriate development in the Green Belt, *very special circumstances* must be demonstrated to outweigh the harm. No detailed design plans have been provided at this stage. The application does not include a statement of the very special circumstances that are considered to apply in this case. It is therefore important, that the Applicants, on the basis that the associated infrastructure is likely to be treated as inappropriate development in the Green Belt, outline fully how the proposed development demonstrates *very special circumstances* sufficient to justify development in this location. **Summary of Requirements:** The Applicants should: • Provide clear justification for the siting of the service reservoir within the Green Belt. • Present a "very special circumstances" case to support development in this location.
5. Cumulative Impacts	It is important for the Applicants to demonstrate that they have assessed the cumulative impacts of construction traffic and associated potential disturbance to ecological interests alongside other ongoing or planned major projects that could be under construction and be commissioned at a similar time, including:

	• The Grafham Water to Cambridge Pipeline, • Cambourne to Cambridge Busway Transport and Works Act Order project (TWAO); • Works to the A428, Black Cat to Caxton Gibbet Road Improvement scheme DCO; • East West Rail DCO. • Northstowe New Town; • Eddington; and • Bourn Airfield. Particular care is required to understand the implications for disruption to local roads during the construction phase, with the potential for cumulative adverse effects on public transport and active travel modes alongside private vehicle trips between important community, education and workplace destinations. Consultation with the Local Highway Authorities as well as National Highways at a sufficiently early stage is expected. **Summary of Requirements:** The Applicants should provide a cumulative impact assessment covering, but not limited to: • The Grafham Water to Cambridge Pipeline. • The Cambourne to Cambridge Busway. • The A428 Black Cat to Caxton Gibbet Improvement Scheme. • East West Rail; • Northstowe; • Eddington; and • Bourn Airfield. The assessment should also confirm consultation with the Local Highway Authorities and National Highways.
6. Air Quality	The information provided at this stage does not, in the Council's view, contain sufficient detail to enable a comprehensive response on likely air quality impacts. It is, however, noted that air quality is identified as a

	proposed topic within the Environmental Impact Assessment (EIA), and that further, more detailed assessment will be undertaken. Since providing comments at NSC-2, the Council welcomes the inclusion of baseline air quality monitoring at sensitive receptors most likely to be affected by construction traffic, although the exact monitoring locations have not been specified at this stage. It would be helpful to understand more about the cumulative effects assessment and how the Applicant intends to evaluate the combined construction traffic impacts, including on air quality, alongside other major projects taking place within similar timescales. The Council notes that the Applicant has proposed a range of generic mitigation measures intended to minimise impacts on air quality during construction. These measures appear appropriate in principle, and the Council would welcome further confirmation of the specific mitigation measures once more information is available. The changes to the proposed infrastructure route within the Council's administrative area do not correspond with any Air Quality Management Areas (AQMAs) or other areas of particular concern regarding air quality. Once operational, the Council does not anticipate any significant impacts on air quality, given that operational activities are expected to be limited to maintenance and repair. However, the Council would expect a review of this matter once further operational details are known. **Summary of Requirements:** The Applicants should: • Specify baseline monitoring locations and methodology. • Assess cumulative air quality impacts from construction traffic alongside other major projects. • Provide detailed, project-specific mitigation proposals once available. • Reassess operational impacts when further design information becomes available.

7. Noise and Vibration	The information provided at this stage does not contain sufficient detail to enable a comprehensive response on likely noise and vibration impacts. It is, however, noted that these topics will be assessed within the EIA, with further detail to be provided in due course. The Council notes that the changes to the proposed pipeline route do not appear to correspond with areas of particularly high concentrations of sensitive receptors. However, there are still some residential properties close to the proposed route, and the Council would expect an assessment of potential impacts on these sensitive receptors from both the construction of the pipeline and the Madingley service reservoir/connection point. It is encouraging to see that the Applicant has undertaken some baseline noise monitoring along the treated water transfer route at receptors most likely to be affected by operational noise. It is not clear, however, whether baseline noise monitoring has been undertaken at the Madingley service reservoir site. It is also noted that, during construction, the Applicant anticipates that certain works will need to take place outside of core daytime working hours. The Council welcomes the Applicant's stated intention to work proactively with the Council to develop appropriate noise and vibration mitigation measures for these works. The Applicant has proposed a series of generic mitigation measures that are likely to be implemented to reduce construction and operational noise impacts. The Council looks forward to reviewing further details of the proposed mitigation as part of the forthcoming EIA. **Summary of Requirements:** The Applicants should: • Undertake baseline noise monitoring at the Madingley service reservoir site and along the pipeline route. • Assess potential impacts on nearby residential receptors. • Provide details of construction methods and mitigation for out-of-hours works. • Supply draft noise and vibration management measures for review.

8. Climate Resilience and Carbon	Following comments made as part of the NSC-2, the Council welcomes the provision of further information regarding the consideration of climate impacts, including carbon emissions, within the Supporting Environmental Information Report (SEIR). It is noted that additional detail will be provided as part of the Environmental Statement, which the Council would welcome early sight of. The general approach and methodology outlined in the report for both construction and operational carbon are supported. It is recognised that continued refinement of the scheme's design will influence overall carbon performance. A number of potential mitigation measures have been identified, and the Council looks forward to these being further examined and developed as the scheme progresses. The Council would be particularly interested in further information regarding the construction efficiencies referenced in paragraph 6.3.57 of the Design Refinement Report, specifically in relation to the service reservoir at Madingley and the opportunities to reuse existing infrastructure, including access routes and power supply. With regard to transport-related carbon emissions associated with the construction phase, it is noted that consideration is being given to the use of low-carbon and alternative fuel construction plant, such as battery-electric, tethered electric, hydrogen combustion and hydrogen fuel cell vehicles. The Council notes, however, that *green* hydrogen is not yet available at scale, and therefore the overall carbon impacts will be heavily influenced by the method of hydrogen production utilised. The Council also welcomes the approach set out in the SEIR regarding climate resilience. Given that the scheme includes buried infrastructure running through clay soils, it is important that potential impacts of soil shrinkage during periods of drought, as well as swelling and possible heave during wetter periods, are fully considered. The report's recognition of potential drought-related impacts on the clay embankments is particularly noted. The inclusion of a new design principle concerning future climate resilience, and the commitment to embed consideration of climate change adaptation across all aspects of the design and operation of the reservoir and associated infrastructure, is welcomed.

	Summary of Requirements: The Applicants should: • Provide detailed carbon accounting for both construction and operation. • Clarify how low-carbon construction plant and materials will be used. • Provide further details on reuse of existing infrastructure at Madingley. • Demonstrate how the scheme embeds climate resilience principles throughout design and delivery.
9. Health and Wellbeing	As raised at NSC-2, there is insufficient information for the Council to provide detailed comment on potential health and wellbeing impacts. However, the Council would direct the Applicant's attention to the Health Impact Assessment (HIA) Supplementary Planning Document (SPD) framework and methodology adopted by the Council. The Madingley service reservoir and the proposed pipeline routes are located in close proximity to villages identified as Minor Rural Centres under Policy S/9 of the South Cambridgeshire Local Plan (2018). These settlements provide key local services and facilities, including GP practices, primary schools, public transport hubs, and local shops, which play an important role in supporting residents within rural communities. The Council considers that the potential for disruption to services and the resulting impacts on vulnerable groups — particularly those with pre-existing health conditions or other life challenges, should be clearly identified and assessed. To strengthen the proposal, the Council would expect to see: • Details of the public consultation undertaken with any vulnerable groups previously identified. • Details of the communication methods used and how feedback has influenced the design of the project • Cumulative impacts of construction traffic of this proposal with other development in this geographical area particularly in relation to disruption to residents. **Summary of Requirements:**

	The Applicants should: • Prepare a Health Impact Assessment in line with the Greater Cambridge HIA SPD (2025). • Identify and assess impacts on vulnerable groups and local service accessibility. • Provide evidence of engagement with affected communities. • Explore cumulative impacts throughout construction phase in relation to other approved development proposals in the area
10. Biodiversity and Habitats	The SEIR provides some information regarding ecology and biodiversity impacts; however, this remains at a high level with limited detail and extensive use of generic language. The Council considers that further investigation will be required to assess several likely impacts. The Council identifies the following *Statutory Protected Sites* as potentially impacted by the project: • Mare Fen Local Nature Reserve (LNR) – cited for its flora; harvest mouse and Great Crested Newt (GCN) have also been recorded here. Owned and managed by Cambridgeshire County Council (CCoC). • Madingley Wood Site of Special Scientific Interest (SSSI) – cited for its ancient woodland, barbastelle bat maternity colonies, and long-running research programme by the University of Cambridge. Owned and managed by the University of Cambridge. • Overhall Grove SSSI – designated for its ancient secondary woodland dominated by small-leaved elm, within whose Impact Risk Zone the proposals fall. Of particular note within South Cambridgeshire is Madingley Wood SSSI, a designated ancient woodland located within approximately 500 metres of the proposed service reservoir to the east of Long Road. Potential impacts to such irreplaceable habitats may include a range of direct and indirect effects. Although the distance from the woodland reduces some risks, these cannot be entirely ruled out at this stage. Changes to the local water table are of particular concern, given that large-scale excavations and possible de-watering during construction could alter groundwater levels in the vicinity, thereby affecting the ancient woodland. While such effects would not in themselves justify refusal of development of this national

	significance, the Council expects that any identified impacts would need to be offset by a comprehensive compensation and mitigation package agreed with the Local Authority. Accordingly, the Council seeks clarification on the following points: • The steps that have been taken to investigate groundwater connections between the proposed service reservoir east of Long Road and Madingley Wood SSSI. • The potential for impact should such connections exist. • The mitigation or compensation which is proposed to address these impacts. Although Mare Fen LNR sits outside the pipeline corridor, any excavations or changes to groundwater levels in the surrounding area must be assessed and, where necessary, mitigated appropriately. <u>Likely non-statutory protected sites to be impacted</u> • Madingley Slip Roadside Verge (RSV) – cited for calcareous grassland indicator species. Owned and managed by National Highways. • Swavesey Meadows County Wildlife Site (CWS) – supports at least 20 mature pollard willows. • Middle Fen CWS – contains multiple submerged, floating, and emergent plant species, along with pollard willows. • Dry Drayton Gravel Pits CWS – cited for plant species, dragonflies, and a high overall invertebrate index; owned and managed as part of an RSPB reserve. The pipeline corridor passes through Middle Fen and Dry Drayton Gravel Pits CWS, both of which depend on groundwater to sustain their ecological characteristics. The Council therefore considers it essential that the Applicant provides sufficient analysis of potential groundwater impacts on these sites, together with appropriate mitigation and restoration proposals for vegetation affected by excavation. The pipeline also passes through the Madingley Slip Roadside Verge (RSV) CWS. Given the embanked nature of the site, the Council recommends that *directional drilling* be employed to avoid disturbance to the vegetation for which the site is designated.

	<u>Likely protected species to be impacted</u> The Council considers that the following protected species are likely to be impacted and will require appropriate survey, assessment, and mitigation: • Bats – the new pipeline and service reservoir (Madingley Tower) are within the impact risk zone of Madingley Woods SSSI, which is cited for its barbastelle bats. They are very light adverse so any new lighting will need a full impact assessment. Other bats will also be present therefore roosting, foraging, and commuting bats will provide a constraint. • Badgers – there will likely be multiple badger setts encountered along the route of the pipeline. All will need to be suitably surveyed with appropriate licenses and mitigation where needed. • Great crested newt (GCN) – Likely to encounter multiple populations along the pipeline route particularly around Swavesey and Over. Swavesey is a red zone, and no District level licensing is available within that zone. • Otter and Water vole – many water ways have records of both species, appropriate surveys and mitigation will be necessary. • Reptiles – likely to encounter multiple populations of common lizard and grass snake. Appropriate survey and mitigation will be required. • Nesting birds including barn owl – appropriate survey and mitigation required. • Terrestrial Invertebrates – high invertebrate index around the Dry Drayton Gravel Pits; therefore, appropriate surveys and mitigation will be necessary. • Aquatic species – the pipeline route crosses multiple water bodies, and all must be assessed for potential impacts to invertebrates, vertebrates, and plant species. <u>Biodiversity Net Gain (BNG)</u> • The Council understands that BNG will become mandatory under legislation in later 2025. • In accordance with the emerging Greater Cambridge Local Plan, the Council has an ambition that at least 20% Biodiversity Net Gain (BNG) will be delivered including all habitat units, linear units, and river habitat units. • The Council supports BNG delivery on and off site or a combination of both.

	• All BNG should be secured for a period of 30 years through a S106 agreement with the relevant authority. **Summary of Requirements:** Applicants should: • Assess and mitigate potential impacts on all designated and non-designated ecological sites listed. • Provide groundwater impact analysis for Madingley Wood SSSI and other sensitive sites. • Commit to delivering at least 20% Biodiversity Net Gain (BNG) for a minimum of 30 years, secured by legal agreement. • Conduct comprehensive protected species surveys with appropriate mitigation and licensing.
11. Historic Environment	The Applicant's assessment should include both designated and non-designated heritage assets. Assessment should encompass the settings of Conservation Areas and Historic Parks and Gardens (HPGs). This is likely to include, but not be limited to, the following: • Historic Parks and Gardens – Childerley Hall (Grade II*), Madingley Hall (Grade II), and the American Military Cemetery (Grade I). • Conservation Areas – Over, Swavesey, Fen Drayton, Elsworth, Knapwell, Madingley, Hardwick, and Coton. The Applicant's assessment should also consider both temporary and permanent views and landscape impacts as they relate to heritage assets, with cross-reference to the Landscape and Visual Impact Assessment (LVIA). Viewpoints should include designed views from designated HPGs and long views incorporating the Madingley service reservoir. **Summary of Requirements:** The Applicants should: • Assess impacts on both designated and non-designated heritage assets, including settings of Conservation Areas and Historic Parks and Gardens.

	• Include cross-reference to the Landscape and Visual Impact Assessment (LVIA) to ensure cumulative visual and setting effects are properly evaluated.
12. Landscape and Visual	The preferred route of the proposed infrastructure (within the Council's administrative area) passes through locally sensitive landscapes, including Fen Drayton Lakes, farmland between Fen Drayton and Swavesey, the rural landscapes between Boxworth and Knapwell, and the historic landscape surrounding Madingley Hall. The site of the Madingley service reservoir lies within the Cambridge Green Belt, on elevated ground with long-distance views towards Cambridge. From the information provided, the Council considers that potential visual and landscape impacts are not yet fully understood and that further information will be required regarding these key views. While the documentation confirms that a Landscape and Visual Impact Assessment (LVIA) will be prepared as part of the Environmental Impact Assessment (EIA), the Council remains concerned about potential significant effects on established landscapes, particularly any removal of longstanding woodland. The Council understands from the documents provided that optioneering of route placement has been selected based on a range of constraints including feasibility/costs. It is disappointing that the Council was not consulted as part of the optioneering process at an earlier stage. The Council notes that an LVIA has not been used to aid in this process, instead however a different criterion-based process was used in a three-stage methodology. The information provided to date does not explain this process or suggest that anything other than remote sensing was used to assess the landscape. The Council considers that ground truthing should have been undertaken to ensure that impacts have been fully and carefully assessed. At this stage therefore, it is not clear if the final option is the least impactful in landscape and visual terms nor whether full reinstatement in places will be achievable and whether easements will be required. **Summary of Requirements:** The Applicants should: • Provide a detailed LVIA supported by site-based assessment (not remote sensing alone). • Clarify how visual sensitivity and landscape character have influenced route selection. • Demonstrate reinstatement feasibility and identify any permanent easements.

	• Consult the Council during the LVIA scoping process.
13. Trees	The Madingley service reservoir site is partially enclosed by a mature woodland belt along its northern and western boundaries, known as the Comberton Plantation. These woodlands are protected by a Tree Preservation Order (TPO) and are recognised for their high amenity value and contribution to the local landscape. The pipeline corridor appears to access the site from the west, potentially passing through this woodland belt. Although this is preferable to an access route from the north, the limited arboricultural information provided makes it unclear whether any tree removal will be necessary to accommodate the proposed infrastructure. The Council therefore seeks further clarification regarding potential impacts on trees surrounding the Madingley service reservoir, including whether any TPO-protected trees are at risk. The Applicant should also provide details of proposed mitigation and compensatory tree planting measures. **Summary of Requirements:** The Applicants should: • Confirm whether any TPO-protected trees within Comberton Plantation are affected. • Provide an Arboricultural Impact Assessment. • Detail proposed mitigation and compensatory planting measures.
14. Land Use, Quality, Soils and Agriculture	The information provided at this stage does not provide sufficient details to provide a detailed response on land contamination. However, it is noted that land quality is identified as a proposed subject within the EIA and further, more detailed, assessment will take place. The proposed pipeline route through SCDC, including revised alignments, does not appear to pass through any significant areas of known historical use that could have led to contamination. However, SCDC will expect the above mentioned more detailed assessment to form part of any future submission or detailed consultation.

	In the absence of details regarding the movement of spoil from trenching during the construction phase of the pipeline, consideration should be given to potential adverse impacts on soil quality resulting from excavation and the movement of materials. **Summary of Requirements:** The Applicants should: • Provide a detailed assessment of soil handling and spoil management to prevent soil degradation. • Assess potential contamination risks and provide mitigation where relevant.
15. Water resources & Flood Risk	The Council would defer to Cambridgeshire County Council (CCoC) as the LLFA, and to the Environment Agency (EA) on this matter. Notwithstanding this, and given the potential impacts on Bin Brook as outlined above in Section 2, the Council requests the following: • That details are provided on how often the outfall will need to be utilised for draining down, and whether this could affect the maintenance frequency of the brook. This discharge represents additional water beyond that which would naturally occur within the catchment • Given that Bin Brook is a highly responsive catchment, careful consideration must be given to ensure the proposals do not inadvertently increase flood risk. There are notable pinch points and structures along the brook as it crosses from South Cambridgeshire into Cambridge City — particularly where water backs up under the highway at Brook Lane, near Manor Farm, Coton. It should be noted that properties in this area have previously experienced serious internal flooding events. Therefore, the introduction or potential for increased upstream flows must be carefully assessed. As such, the discharge rate will need to be agreed with the Council, and the impact of any additional water fully evaluated. Furthermore, the Council also request details regarding the potential adverse impact of the connecting pipelines on subterranean water flows and groundwater levels.

	Summary of Requirements: The Applicants should: • Provide detailed hydraulic modelling of the Bin Brook outfall. • Agree discharge rates with relevant authorities. • Assess impacts on flood risk both upstream and downstream. • Include assessment of effects on groundwater flows.
16. Minerals and Waste	SCDC would defer to CCoC as the Minerals and Waste Local Planning Authority on this matter.
17. Transport and Highways	SCDC would defer to CCoC as the Highway Authority on this matter.
18. Public Rights of Way	SCDC defer to CCoC as the Highway Authority on this matter.
19. Archaeology	SCDC defer this matter to CCoC