Cambridge Waste Water Treatment Plant Relocation Project
Anglian Water Services Limited

Appendix 3.2: Initial Site Selection

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MOTT MACDONALD

Cambridge Waste Water Treatment Plant Relocation

Stage 1 - Initial Site Selection Report

1 July 2020

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S.3. The Initial Options Appraisal concluded that the preferred solution for the relocation of the Cambridge WWTP would comprise a single new WWTP, within a Study Area covering the existing Cambridge and Waterbeach drainage catchment areas.

S.4. The next step in the process is Stage 1 – Initial Site Selection (this report), which comprises mapping constraints within the Study Area to identify a longlist of potential site areas to be taken forward for further site selection.

S.5. The steps undertaken as part of this initial site selection and the resulting conclusions are:

- A set of criteria were defined to produce a list of baseline constraints to use in the initial screening assessment.
- Green Belt designation was not used as a baseline constraint. Although Green Belt designation is a planning constraint that must be considered during site selection, it would remove a large proportion of the Study Area from consideration and development of a new WWTP within it may be acceptable if certain very special circumstances exist.
- The baseline constraints were applied to the Study Area for the relocation of Cambridge WWTP in order to identify the potential unconstrained areas.
- A Total of 99 individual unconstrained areas were identified within the Study Area, 52 of which were less than 1ha in size, the other 47 areas ranged from 1.1ha to 220.9ha in size.
- As set out in the Statement of Requirement (Anglian Water, Cambridge Waste Water Treatment Plant Relocation Project, Statement of Requirement, 2019a), the expected size for the new WWTP is 22ha, hence, all unconstrained areas smaller than 22ha were eliminated.
- The initial site selection has identified 14 potential areas that could be utilised for the relocation of Cambridge WWTP based on the baseline constraints. These range in size from 29.2ha to 220.9ha.

S.6. The 14 potential site areas that comprise the longlist will be taken forward to Stage 2 – Coarse Screening. This stage will assess the longlisted site areas against a range of criteria, to identify a shortlist of best performing site areas.

1 Introduction

This section provides an introduction to the Stage 1 – Initial Site Selection.

1.1 Background

1.1.1 A site selection process, comprising a number of detailed appraisal steps was developed to identify sites that may be suitable for the relocation of the waste water treatment plant to replace the existing Cambridge WWTP.

1.1.2 The first step was an Initial Options Appraisal, which examined the strategic issues to be considered in investigating relocation options, and also identified the most appropriate area in which to search for new WWTP sites (the Study Area).

1.1.3 The Initial Options Appraisal concluded that the preferred solution for the relocation of the Cambridge WWTP would comprise a single new WWTP, within a Study Area covering the existing Cambridge and Waterbeach drainage catchment areas (Mott MacDonald, 2020).

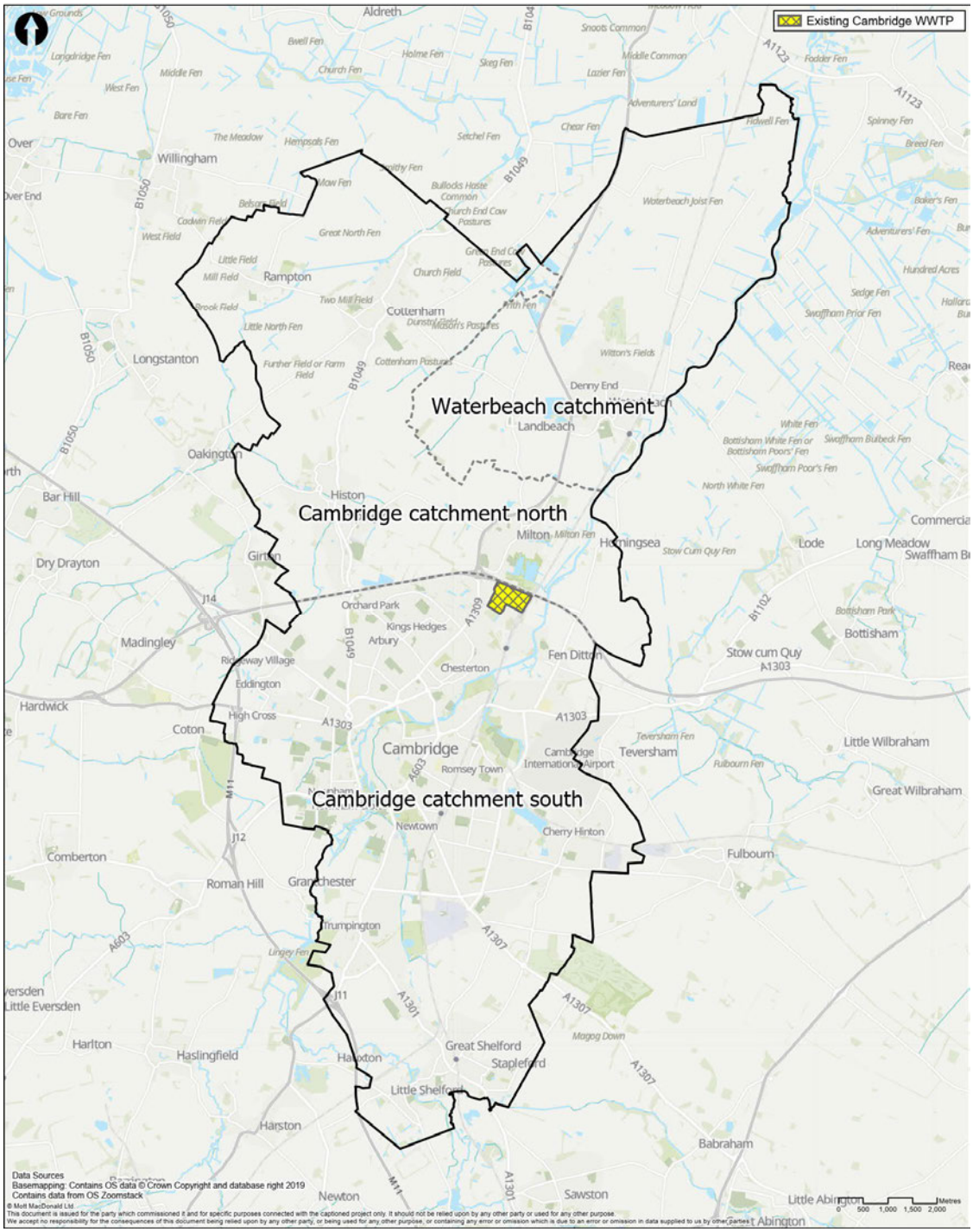
1.1.4 The next step in the process is Stage 1 – Initial Site Selection (this report), which comprises mapping constraints within the Study Area to identify a longlist of potential site areas to be taken forward for further site selection.

1.2 Study Area

1.2.1 The drainage catchment area was sub-divided at the existing WWTP discharge location and along the A14 dual carriageway in the Initial Options Appraisal to take account of the distinct differences in landscape in the area i.e. the Cambridge urban area upstream of the discharge location (south of the A14) and more open and rural area downstream of the discharge location (north of the A14) .

1.2.2 The Study Area covering the whole of the combined Cambridge and Waterbeach drainage catchment area, both north and south of the A14, is shown in Figure 1.1.

Figure 1.1: Study Area



Source: Contains OS data © Crown Copyright and database right 2019

2 Initial screening phase

2.1 Definition of baseline constraints

2.1.1 The relevant national, regional and local policies were reviewed to identify the baseline constraints and apply buffer zones around them. The use of buffers ensured that any unconstrained areas would be away from residential properties, protected and statutory designated sites and existing important infrastructure in order to limit any potential impacts on them. The baseline criteria adopted at Stage 1, the buffers applied, and the relevant policies are listed in Table 2.1 and discussed individually in the following sections.

2.1.2 The buffers applied to each of the baseline constraints have been defined using professional judgement, with the exception of communities, which was defined to comply with Anglian Water's asset encroachment policy (Anglian Water, 2019b) and the policies relating to potential odour impacts on residential amenity specified in the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (Cambridgeshire County Council & Peterborough City Council, 2011). It is noted that the National Policy Statement (NPS) for Waste Water (DEFRA, 2012) does not refer to prescribed buffer zones for any of the criteria.

2.1.3 The baseline constraints were applied to the Study Area for the relocation of Cambridge WWTP shown in Figure 1.1, in order to identify the potential unconstrained areas.

Table 2.1: Stage 1 constraints

Category	Criteria	Definitions	Relevant Policy
Operational	Airfields and Runways	Applied extent of sites without buffers.	Guidance on Safeguarding of Aerodromes from the Civil Aviation Authority
	Major Infrastructure	100m buffer applied around A roads, B roads, railways and other significant transport routes. 20m buffer applied around C roads.	Professional judgment used in order to avoid existing infrastructure
	Oil & Gas Pipelines, Major Electrical Transmission Routes	100m buffer applied around National Grid infrastructure.	
Environmental	Flood Zones	Environment Agency Flood Zones 2 and 3 applied without buffers.	National Policy Statement for Waste Water Cambridgeshire and Peterborough Minerals and Waste Core Strategy
	Landfill Sites	Current and historic landfill sites applied without buffers.	Professional judgment used in order to avoid potentially contaminated land
	Protected and Statutory Designated Sites	500m buffer applied around Areas of Outstanding Natural Beauty, Ancient Woodland, Local Nature Reserves, National Parks, Ramsar sites, Special Areas of Conservation, Special Protection Areas, Sites of Special Scientific Interest, World Heritage sites, Scheduled Ancient Monuments, Listed Buildings, Registered Parks and Gardens and Registered Battlefields.	National Policy Statement for Waste Water
	Watercourses	100m buffer applied around main rivers designated by the Environment Agency.	National Policy Statement for Waste Water Water Framework Directive
Community	Communities	400m buffer applied around all residential properties.	Anglian Water Asset Encroachment Policy National Policy Statement for Waste Water Cambridgeshire and Peterborough Minerals and Waste Core Strategy

Source: Mott MacDonald
Note: Not all types of Protected Sites and Statutory Designated Sites are found in the study area but are listed here as their locations were reviewed.

Airfields & Runways

Wildlife Hazards

2.1.5 It is possible that a WWTP could pose a risk to aviation, as birds attracted to the site due to the presence of open bodies of water could increase the risk of a collision with aircraft in the vicinity. This is a particular concern where such a waterbody is located in the vicinity of a live airfield, where aircraft are present at lower altitudes.

2.1.6 Guidance on Wildlife Hazards around Aerodromes (Airports Operation Association, 2016) indicates that any development within a 13km radius of an active public aerodrome should be assessed in relation to the level of risk it may pose to aviation.

2.1.7 The guidance states that:

> *"This 13km zone should be seen as a planning guide…The proposed development would need to either: increase the population of hazardous birds; or to generate flight lines that enter critical airspace, to increase the risk in order for it to be determined as unacceptable."*

2.1.8 There is no guidance on an absolute minimum distance from an airfield for a development that may pose a risk of bird strike.

2.1.9 Airfield sites were identified to assess whether any potential sites within the study area could pose a risk. This was undertaken with reference to OS MasterMap and available satellite imagery.

2.1.10 The only active airfield identified in the region is Cambridge Airport located in the south east of the study area, which is also home to Marshalls Aerospace.

2.1.11 Applying a 13km buffer around this site would cover the majority of the Study Area. As this zone is only a planning guide it should not be applied as a baseline constraint in this phase of screening.

Building Heights

2.1.12 Air safeguarding zones in relation to building heights are in place as a result of Cambridge Airport's role as a contractor for the Ministry of Defence.

2.1.13 The Marshall Group, the Airport's owner, provide information on necessary height constraints to Cambridge City Council. This information is mapped by Cambridge City Council in Policy 37 of the Cambridge Local Plan (Cambridge City Council, 2018) and South Cambridgeshire District Council in Figure 12 of the South Cambridgeshire Local Plan (South Cambridgeshire District Council, 2018). The constraint layer indicates the areas where restrictions on building heights may be required in order to allow the airport to continue to operate safely.

2.1.14 The Marshall Group is consulted on planning applications for developments that exceed the height restriction constraints and its opinion is considered by Cambridge City Council and South Cambridgeshire District Council when determining any such planning application.

2.1.15 It is considered that discounting of sites due to their location within these height constraint areas would not be valid at this stage of site selection. Therefore, only the extent of Cambridge Airport site has been used as a constraint and no buffer has been applied.

2.1.16 It is recommended that proximity to Cambridge Airport and the height constraint areas should be considered during fine screening, when a conceptual design for each potential site area has been produced, so that the risk to aviation can be assessed.

2.1.17 Cambridge Airport is expected to be relocated by 2030 (Marshall Aerospace and Defence Group, 2019) at which point the criteria detailed above are not likely to pose a constraint on the relocated WWTP. However, as Anglian Water must complete the relocation of the WWTP by 2028, the potential constraints will be relevant during construction period and at least the first two years operation. Therefore, it is considered necessary to assess the site areas against these constraints during fine screening.

Transport Infrastructure

2.1.18 Significant transport infrastructure was identified within the Study Area, namely national A- and B- class roads, regional C-class roads, as well as railways and the guided busway. A 100m buffer was applied along the alignment of all A Roads, B Roads, the railway and the guided busway, and a 20m buffer around C Roads, as it was considered impractical to divert these transport routes.

2.1.19 The transport infrastructure buffer widths were chosen using professional judgement to encompass the likely width of the road/railway, all roadside/rail side infrastructure as well as landscaping.

2.1.20 A number of unclassified roads and byways are present within the study area. It was considered that diverting this infrastructure would be possible in order to develop the WWTP; therefore, these were not considered as baseline constraints.

Oil and Gas Pipelines, Major Electrical Transmission Routes

2.1.21 No major energy transmission infrastructure was identified within the study area, following a review of information made publicly available by National Grid.

2.1.22 It was noted that information on some existing or planned major buried infrastructure routes may not be publicly available, and stakeholder engagement is required to confirm their location following further definition of the site extents. These may include:

- Ministry of Defence (MOD) fuel pipelines or other confidential installations
- Private utility operators.

Flood Zones

2.1.23 The NPS for Waste Water (DEFRA, 2012) indicates that flood risk should be taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk.

2.1.24 The NPS specifies that in determining an application for development consent, the decision maker should be satisfied that the Sequential Test has been applied as part of site selection. The Sequential Test specifies that preference should be given to locating projects in Flood Zone 1, and only if there is no reasonably available site in Flood Zone 1 can projects be located in Flood Zone 2.

2.1.25 Therefore, it is deemed appropriate to avoid potential sites in areas with a higher risk of flooding at this stage of site selection. To achieve this, the areas covered by Flood Zones 2 and 3 within the study area were identified by means of information made publicly available by the Environment Agency (EA) and applied as a baseline constraint without buffers.

Landfill Sites

2.1.26 Current and historic landfill sites were identified throughout the study area by means of information made publicly available by the EA.

2.1.27 There are two operational landfills within the area, these are:

- Milton landfill located near the A14 junction with the A10, and
- Waterbeach Waste Management Facility located adjacent to the A10 to the north of Waterbeach.

2.1.28 Buffers were not applied around landfill sites as it is considered that the risks of excavating or building on potentially contaminated land adjacent to these sites could be mitigated.

Protected and Statutory Designated Sites

2.1.29 A 500m buffer was applied around the protected and statutory designated sites provided in Table 2.2. Sites within 500m of the Study Area boundary are also included as their buffers penetrate the Study Area.

Table 2.2: Protected and Statutory Designated Sites

Description	Number within Study Area (including 500m buffer around boundary)
Special Areas of Conservation (SAC)	0
Ancient Woodland	0
National Nature Reserves (NNR)	0
Areas of Outstanding Natural Beauty (AONB)	0
Local Nature Reserves (LNR)	17
National Parks (NP)	0
Ramsar sites	0
Sites of Special Scientific Interest (SSSI)	4 wholly within the Study Area 2 partially within the Study Area 2 outside of the Study Area but within 500m of the boundary
Special Protection Areas (SPA)	0
World Heritage Sites (WHS)	0
Scheduled Monuments (SM)	27
Listed Buildings (Grade I, II* and II)	I - 76 II* - 76 II - 1022
Registered Parks and Gardens (RPG)	12
Registered Battlefields.	0

Source: Mott MacDonald

2.1.30 The NPS for Waste Water (DEFRA, 2012) does not prescribe buffers around protected and statutory designated sites but states that development should aim to avoid significant harm to biodiversity and geological conservation interests, and that there should be a presumption in favour of the conservation of designated heritage assets. Therefore, using professional judgement, the 500m buffer was considered an appropriate offset to minimise the potential impacts of a new WWTP on the protected and statutory designated sites listed above.

2.1.31 The impacts of each potential site area on these protected and statutory designated sites will be assessed further during the next stage of site selection.

Watercourses

2.1.32 Using professional judgement, a 100m buffer was applied around the watercourses identified as a 'Main River' by the EA, as listed in Table 2.1, to avoid the risk of environmental / ecological deterioration at these locations. The 'Main Rivers' classification includes both natural and modified watercourses.

2.1.33 Many smaller natural watercourses and engineered drainage channels are present within the Study Area, which are not identified as 'Main Rivers' by the EA. While it is recognised that permissions would need to be agreed with the relevant local authorities or Internal Drainage Board, it was considered that these watercourses could potentially be diverted around the boundary of the WWTP if required; therefore, these were not considered as a baseline constraint at this stage.

Communities

2.1.34 The community criterion was defined to align with Anglian Water's asset encroachment policy (Anglian Water, 2019b). This assesses the potential risk of proposed development in proximity to existing WWTPs primarily in relation to odour impacts. Anglian Water uses a risk assessment process to consider any planning application within 400 metres of an existing WWTP works.

2.1.35 The assessment methodology indicates that the risk of odour impact increases with the capacity of a WWTP and indicates that there is a high risk for developments within 400 metres of a WWTP that serves a population greater than 50,000 people. This risk is described as a potential loss of amenity posed to the development and a potential impact on Anglian Water's ability to operate its WWTP.

2.1.36 It is considered that this policy is also relevant to the siting of new WWTPs and the potential risk this could pose to the local community. As the new Cambridge WWTP will be designed to serve a population in excess of 500,000 people, Anglian Water considers that situating the WWTP within 400 metres of any existing residential properties would result in unacceptable risks to the local community and the operation of the plant.

2.1.37 Therefore, a 400 metre buffer was applied around each individual residential property within, and bordering on, the Study Area. The locations of the residential properties were identified using the Ordnance Survey (OS) AddressBase database.

2.1.38 This buffer also aligns with the policies relating to potential odour impacts on residential amenity specified in the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (Cambridgeshire County Council & Peterborough City Council, 2011). The strategy states that any proposal for a new site within 400 metres of properties normally occupied by people would require an odour assessment demonstrating that the proposal is acceptable, together with appropriate mitigation measures.

2.1.39 Commercial properties were not included within this criterion as, unlike residential properties, it is considered that not all commercial properties would experience the same impact if the WWTP was located nearby. The potential impact of the WWTP scheme on a commercial property is variable and depends on several factors including the type of business and the occupancy of the property. Therefore, the potential impact on commercial properties is considered in later stages of the site selection process.

2.1.40 Whilst the use of the OS AddressBase database is considered appropriate for this stage of site selection, it is possible that it may not be comprehensive for all residential properties within the Study Area. A review of the properties in proximity to the potential site locations should be completed at a later stage in the site selection process to identify any residential properties not

included in the database and buildings that are currently included in the database that may not be used for residential purposes.

2.2 Previously developed land

2.2.1 As part of the Stage 1 process, prior to conducting the constraints mapping exercise, a search was undertaken for previously developed land and sites within the Study Area that would be suitable for the new WWTP. The Cambridge City (Cambridge City Council, 2019) and South Cambridgeshire (South Cambridgeshire District Council, South Cambridgeshire Brownfield Register, 2018a) Brownfield Registers were examined to search for sites of a suitable size. There are no sites on the registers that are suitable or available for the new WWTP.

2.2.2 The only other large previously developed site in the Study Area is Cambridge Airport. The areas not in use by the Airport have already been granted planning permission for residential purposes. According to Policy 13 in the adopted Cambridge Local Plan 2018 (Cambridge City Council, 2018):

> *"The rest of the Cambridge East site is safeguarded for longer term development beyond 2031. Development on safeguarded land will only occur once the site becomes available and following a review of both this plan and the Cambridge East Area Action Plan."*

2.2.3 At the present time this land is unavailable, and the current indications are that any relocation of the Airport will only be complete by 2030 (Marshall Aerospace and Defence Group, 2019). Anglian Water must complete relocation of the WWTP by 2028, therefore, the Airport site is not an option for the new WWTP. Furthermore, it is likely that the Airport site will be predominantly a residential site and consequently would not be suitable for the new WWTP.

2.3 Constraints mapping

2.3.1 All of the individual constraints detailed in Section 2.1 were mapped onto the Study Area, and their buffers applied. Drawings illustrating the location of all individual constraints and buffers are provided in Drawing 409071-MMD-00-XX-GIS-Y-0001 to 409071-MMD-00-XX-GIS-Y-0007 in Appendix A.

2.3.2 The buffered constraints were then combined in order to identify remaining unconstrained land parcels, as shown in Drawing 409071-MMD-00-XX-GIS-Y-0008.

2.3.3 A total of 99 individual unconstrained areas were identified within the Study Area, 52 of which were less than 1ha in size, the other 47 areas range from 1.1ha to 220.9ha in size. All of the unconstrained areas are shown on Drawing 409071-MMD-00-XX-GIS-Y-0009.

2.4 Green Belt

2.4.1 Green Belt policy was established to prevent urban sprawl by keeping land permanently open. Typically, a Green Belt is an area of land surrounding or neighbouring an urban area on which development is restricted by national and local planning policy.

2.4.2 The Cambridge Green Belt designation surrounds the Cambridge urban area, extending up to 5 miles from the edge of the City and incorporates a number of villages.

2.4.3 The purposes of the Cambridge Green Belt as set out in the both the Cambridge Local Plan (Cambridge City Council, 2018) and the South Cambridgeshire Local Plan (South Cambridgeshire District Council, 2018) are to:

- Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre
- Maintain and enhance the quality of its setting, and
- Prevent communities in the environs of Cambridge from merging into one another and with the city.

2.4.4 Both Local Plans state that new development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework (NPPF) (Ministry of Housing, Communities & Local Government, 2019).The NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

2.4.5 The NPS for Waste Water (DEFRA, 2012) specifies that when located in the Green Belt, waste water infrastructure projects may comprise 'inappropriate development'. The NPS adds that such development should not be approved except in very special circumstances.

2.4.6 Green Belt policy is an important planning constraint that must be considered when selecting the potential sites for the new WWTP. However, it is considered that Green Belt should not be used as a baseline constraint at this stage of site selection for the following reasons.

- The Cambridge Green Belt covers a large proportion of the Study Area (approximately 50%) and the remaining area comprises the Cambridge urban area and rural areas relatively distant from the existing WWTP, as shown on Drawing 409071-MMD-00-XX-GIS-Y-0010 in Appendix A.
- As the Green Belt designation is a non-statutory planning policy designation, development within it may be acceptable if certain very special circumstances exist. For example, if no feasible alternatives could be identified this could result in the very special circumstances required to propose development of a site within the Cambridge Green Belt.

2.4.7 Therefore, Green Belt has not been included as constraint at this stage. However, it has been mapped with the unconstrained areas to illustrate their distribution within and outside the Green Belt, as shown on Drawing 409071-MMD-00-XX-GIS-Y-0011. The drawing shows that most of the unconstrained areas are located within the Green Belt and using it at a constraint at this stage would severely limit the potential sites for further consideration.

2.5 Longlist of potential site areas

2.5.1 The total footprint area required for the new WWTP site is expected to be 22ha (Anglian Water, Cambridge Waste Water Treatment Plant Relocation Project, Statement of Requirement, 2019a). This is based on the use of similar technologies to those recently implemented at the existing WWTP and allows for growth. This does not include the area that may be required for landscape impact mitigation.

2.5.2 In comparison, the total footprint of the existing Cambridge WWTP is approximately 40ha. The required footprint for the new WWTP is significantly less due to the use of different, lower footprint, technologies, similar to those recently installed at the existing WWTP. In addition, the new WWTP will have an optimised layout, whereas the existing site is the result of many years of incremental modifications and includes a number of redundant legacy assets.

2.5.3 Using the footprint defined for the new WWTP, the unconstrained areas were reviewed and those under 22ha were discarded from further assessment. The 14 remaining unconstrained areas, which are greater than or equal to 22ha, are considered to represent the longlist of potential site areas, as shown on Drawing 409071-MMD-00-XX-GIS-Y-0012. Table 2.3 provides a list of the potential site areas and their sizes.

Table 2.3: Long list of potential sites

Reference	Area (ha)
A	52.6
B	55.2
C	40.5
D	36.8
E	76.7
F	220.9
G	97.1
H	165.8
I	67.6
J	52.8
K	49.4
L	127.1
M	29.2
N	43.8

Source: Mott MacDonald

3 Conclusion and Next Steps

3.1 Conclusions

3.1.1 The steps undertaken as part of this Stage 1 – Initial Site Selection and the resulting conclusions are set out below.

- A set of criteria were defined to produce a list of baseline constraints to use in the initial site selection assessment.
- The Cambridge Green Belt designation was not used as a baseline constraint. Although Green Belt is a planning constraint that must be considered during site selection, it would remove a large proportion of the Study Area from consideration and development of a new WWTP within it may be acceptable if certain very special circumstances exist.
- The baseline constraints were applied to the Study Area for the relocation of Cambridge WWTP in order to identify the potential unconstrained areas.
- A total of 99 individual unconstrained areas were identified within the Study Area, 52 of which were less than 1ha in size, the other 47 areas range from 1.1ha to 220.9ha in size.
- The likely minimum size of the new WWTP of 22ha was then applied to the unconstrained areas in order to discount all areas with an absolute size of less than 22ha.
- The initial site selection exercise has identified 14 potential site areas that could be utilised for the relocation of Cambridge WWTP based on a set of baseline constraints. These range in size from 29.2ha to 220.9ha.

3.2 Next Steps

3.2.1 The 14 potential site areas that comprise the longlist will be taken forward to Stage 2 – Coarse Screening. This stage will assess the longlisted site areas against a range of criteria, to identify a shortlist of best performing site areas.

References

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Appendices

Appendicies not available as part of the DCO application
These drawings are publically available on https://cwwtpr.com/document-library

A. Drawings

Get in touch

You can contact us by:

Emailing at **info@cwwtpr.com**

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

Writing to us at **Freepost: CWWTPR**

Visiting our website at [redacted]

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

https://infrastructure.planninginspectorate.gov.uk/projects/eastern/cambridge-waste-water-treatment-plant-relocation/