

Greater Cambridge Shared Planning
South Cambridgeshire Hall
Cambourne Business Park
Cambourne, CB23 6EA

www.greatercambridgeplanning.org



By email:

CambridgeWWTPR@planninginspectorate.gov.uk

Date 19th July 2023

Dear Sir/Madam

Application by Anglian Water Services for an Order Granting Development Consent for the Cambridge Waste Water Treatment Plant Relocation (CWWTPR)

Relevant Representation of South Cambridgeshire District Council

INTRODUCTION

1. The following representation is made on behalf of South Cambridgeshire District Council only which hereafter is referred to as the 'District Council' (or SCDC). It is proposed that the District Council will make separate representations and submissions to the Examining Authority ('the ExA') in respect of the above referenced CWWTPR application. (the DCO application') to its fellow authority Cambridge City Council.
2. The District Council will also prepare and submit a separate Local Impact Report to that of Cambridge City Council.
3. As set out below the District Council's position in overall terms is that of support for the DCO application subject to the resolution of a number of

matters and subject more specifically to the assessment of the ExA and the determination by the Secretary of State of the DCO application in light of the ExA's report and recommendation.

Proposed Order Land and Status of the District Council

4. The current application for the draft Development Consent Order encompasses the site of the existing Cambridge Waste Water Treatment Plant (CWWTP) and the site in respect of the Relocated Cambridge Waste Water Treatment Plant (ReWWTP), together with a tunnel and pipeline corridors; waste water transfer tunnel; treated effluent transfer (including River Cam Outfall) and a Waterbeach transfer pipeline.
5. The existing site of the CWWTP is located on Cowley Road Cambridge and the core site for the proposed ReWWTP is located south of Horningsea with the A14 on its southern boundary.
6. To that end the proposed Order land includes land in both Cambridge City Council's area (in particular the existing CWWTP) and SCDC's area (in particular the ReWWTP). To that end also both are local authorities to which s42 and s43 of the Planning Act 2008 ('the 2008 Act') apply in respect of the pre-application consultation process and also clearly fall within the definition of an Interested Party to the examination in accordance with s102(1)(c) of the 2008 Act.

Proposed Development and Section 35 Direction

1. The proposed development is, by virtue of the Secretary of State's direction under section 35 of the 2008 Act dated 18 January 2021 ('the s35 Direction') *"is to be treated as development for which development consent is required"* in accordance with the 2008 Act.
2. The Secretary of State's reasons for so directing are set out in the Annex to the s35 Direction. They confirm that he is of the opinion that the proposed

development or the project by itself is of national significance having taken into account that the project has a number of features as follows:

- a complex and substantial relocation scheme, involving extensive infrastructure works and requiring multiple consents involving various statutory undertakers;
- provides a key contribution to the development of Cambridge, particularly to the North East of the city, and to the investment in waste water infrastructure;
- enable the relocation of the existing Cambridge Waste Water Treatment Plant; the development of that brownfield site; and the development of provision of waste water services to a proposed development at Waterbeach New Town;
- benefits from the application being determined in a timely and consistent manner by the Secretary of State through removing the uncertainty of applying for numerous separate approvals across multiple local authority areas.

3. Furthermore, the Secretary of State notes that the proposed project:

- is likely to support growth in the economy through its contribution to the development of North East Cambridge;
- will have an impact across several local authority areas;
- has been granted Housing Infrastructure Funding to ensure its delivery by 31 March 2028;
- will be important to meet government housing objectives; and

- will be of a substantial physical size.
4. The District Council recognises the above views of the Secretary of State and in particular the significance of the relocation of the existing CWWTP and the benefits that creates through its contribution towards achieving the spatial development strategy for homes and jobs being proposed through the District Council's emerging joint Greater Cambridge Local Plan being prepared with Cambridge City Council.
 5. It is nevertheless clear that it is for the ExA to assess and examine the DCO application in accordance with the statutory tests under s104 or s105 of the 2008 Act and report on it with recommendations to the Secretary of State. The Secretary of State thereafter will determine whether to grant the DCO. This examination and decision exercise will include assessing any potential benefits that the District Council and other interested parties may identify arising from the project as well as any other potential negative impacts arising from the same, taking into account any proposed mitigation measures in respect of any identified harm and any other relevant and important matters.
 6. The District Council has, for the purpose of this relevant representation, set out below, the main issues and other aspects which include the beneficial elements of the proposed development as well as highlighting where the District Council considers that further information or consideration is required to understand the project better and /or where it considers further information and mitigation of any potential adverse effects of the proposals is needed.

7. The District Council considers this will assist the ExA and help it evaluate the impacts of the proposed development based on full or complete information and help the ExA to form a clear understanding of the DCO.

8. These matters will also be reflected in the production of the Local Impact Report that will be submitted during the examination.

MAIN ISSUES

Development Plan Context

9. The DCO application correctly highlights the District Council's and the Cambridge City Council's shared long-held ambition to regenerate the part of the city within which the existing plant is located (the CWWTP site'). Over the past 20 years the CWWTP site and surrounding area has been promoted through consecutive statutory planning policy documents for redevelopment, to make the most of the Greater Cambridge area's sustained economic growth and, more recently, the investment in sustainable transport provision that serves the North East Cambridge area.

10. As further outlined in the DCO application¹, such ambition has not been able to be realised to date due to the cost of relocation of the CWWTP rendering the proposal unviable. The existing CWWTP also constrains development in the surrounding area due to the odour contours around the plant. The option of consolidation on site has been put to Anglian Water (the applicant) in the past but this was dismissed by them as not being technically feasible due to the need to maintain the operational capacity of the existing plant during construction. Further, consolidation would only realise the release of limited land, as the redevelopment potential created by this option would continue to be constrained by odour, hours of operation etc. The current submission is

¹ See Planning Statement [doc 7.5]

instead a result of a funding bid submitted under the Housing Infrastructure Fund (HIF) aimed at unlocking new housing growth opportunities.

11. The current adopted South Cambridgeshire Local Plan 2018, along with a mirror policy in the Cambridge Local Plan 2018, identifies the potential strategic redevelopment opportunity (see Policy SS/4 Cambridge Northern Fringe East and Cambridge North railway station). Relocation of the CWWTP is not a policy requirement and as such the adopted plans make no reliance upon any employment development or residential development arising out of the allocation in order to meet housing and employment plan requirements up to 2031.
12. As referred to in the applicant's Planning Statement (Doc ref. 7.5) in September 2017, Cambridgeshire and Peterborough Combined Authority ("the Combined Authority") put forward an expression of interest for Housing Infrastructure Fund to cover the cost of relocating the CWWTP. The bid had the support of Anglian Water and Cambridge City Council as landowners.
13. The subsequent confirmation of a HIF funding award has overcome the viability constraint for relocating the CWWTP.
14. As a result, the Councils (South Cambridgeshire District Council and Cambridge City Council) have sought to determine the development potential that may be realised through preparation of a Draft Area Action Plan for North East Cambridge ('the draft NEC AAP') and through the proposed allocation of North East Cambridge within the spatial strategy of the emerging Greater Cambridge Local Plan ('the draft GCLP' proposed Policy S/NEC) which is being prepared jointly by the District Council and Cambridge City Council. The enlarged AAP area (from the adopted 2018 Local Plans) is a key component of future pipeline housing and other development supply in the new plan period to 2041. As stated in the DCO application, the deliverability of the area and the indicative capacities are contingent on the DCO being granted.

15. Consultation on the Draft Proposed Submission (Regulation 19²) NEC AAP was considered and agreed by the District Council's, and Cambridge City Council's [Planning and Transport Scrutiny Committee on 11 January 2022](#), and [South Cambridgeshire District Councils Cabinet on 10 January 2022](#) subject to the Development Control Order being undertaken by Anglian Water for the relocation of the Waste Water Treatment Plant being approved.
16. The NEC AAP process has therefore been paused until such time as the DCO process is concluded
17. The emerging joint Greater Cambridge Local Plan has been the subject of two Regulation 18³ consultations (First Conversation in January 2020 and First Proposals in November 2021).
18. A Development Strategy Update report for the emerging Greater Cambridge Local Plan was agreed by the District Council's [Cabinet on 6 February 2023](#), and [Cambridge City Council's Planning and Transport Scrutiny Committee on 17 January 2023](#). Both Councils agreed that three key sites should form part of the development strategy for the Greater Cambridge Local Plan ('GCLP'), including North East Cambridge ('NEC'). The proposed policy direction is that the new GCLP should include and prioritise delivery of North East Cambridge as an important part of the development strategy to deliver an inclusive, walkable, low carbon new city district⁴. The proposed approach in the emerging GCLP is predicated on the relocation of the WWTP taking place. However, the locational merits of the site are clear from the evidence base supporting the emerging GCLP. The GCLP Development Strategy Update document makes clear that this brownfield site within the urban area of Cambridge is the most sustainable location for strategic scale development available within Greater Cambridge.

² In accordance with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

³ In accordance with regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

⁴ Greater Cambridge Local Plan –Development Strategy Update.

19. Reference is made in the DCO application [Planning Statement Doc ref.7.5] to a further Regulation 18 consultation on a Preferred Options draft of the GCLP taking place in Autumn 2023. The District Council notes that this reflects the timetable within the adopted Local Development Scheme (LDS). However, both the District Council and Cambridge City Council have made public the need to update the LDS to take account of the CWWTP DCO process and also to delays to the Cambridge Water Water Resources Management Plan ('WRMP'). The WRMP is an important part of the emerging plan process as it provides clarity about available water supply during the new plan period to 2041. The Forward Plan of the Council's Cabinet meetings identifies that a report dealing with a review of the LDS will be brought to Members not before September 2023.

Benefits of the DCO Application and Project

20. With respect to the planning benefits that would arise as a consequence of the DCO development proposal, the District Council considers these to be as follows:
- The relocation of the CWWTP will facilitate the comprehensive development of the wider NEC area, optimising the development potential and enabling other benefits to the District to be realised.
 - The release of the existing CWWTP site for redevelopment will also remove the existing constraints imposed by the Waste Water Treatment Safeguarding Area designation upon the site and surrounds in respect of any development on land within 400m of the existing CWWTP.
 - The wider NEC area, including the existing CWWTP site, is identified through evidence supporting the emerging joint Greater Cambridge

Local Plan (Regulation 18) as the most sustainable location in Greater Cambridge for development

- Evidence in support of the Draft Proposed Submission AAP (Regulation 19) shows the potential for the existing CWWTP site, once vacated together with neighbouring City Council owned land to accommodate c.5,600 net new homes, and by removing environmental constraints, to enable up to a further c.2,750 net new homes on surrounding sites. Therefore, again the release of the existing CWWTP site will underpin the delivery of 8,350 homes.⁵
- The NEC area will make a significant contribution to the substantial housing needs of the Greater Cambridge area identified in the emerging Greater Cambridge Local Plan to 2040 and beyond⁶.
- Alongside the provision of substantial numbers of housing units, the ability to redevelop the vacated CWWTP site also offers the opportunity to deliver further beneficial commercial floorspace and a range of town centre uses, as well as social and physical infrastructure that will support the area's continued growth as a strategically important economic driver for Greater Cambridge and create a vibrant new urban quarter to Cambridge.

21. Alongside the above development benefits that arise from the release of the existing CWWTP site there are other separate benefits which arise out of the provision of the ReCWWTP:

- The proposed ReCWWTP facility would be designed to provide sufficient capacity to treat the waste water needs for the combined

⁶ The Greater Cambridge Local Plan First Proposals identified the objectively assessed housing needs over the period 2020-2041 as 44,400 homes, with around 3,900 homes at NEC anticipated in the plan period. The Development Strategy Update 2023 identified increased objectively assessed housing needs of 51,723 homes.

Cambridge and Waterbeach catchment area into the 2080s, including an allowance for climate change.

- The new facility would help address the need to improve the water quality within the River Cam through significantly reducing concentrations of phosphorus, ammonia, total suspended solids and biological oxygen demand in final treated effluent discharges compared with the current WWTP.
- The proposed ReCWWTP represents a consolidated solution towards water treatment for Waterbeach new Town and the City of Cambridge.
- The design of the ReCWWTP allows for future expansion of operations if required to accommodate anticipated flows into the early 2100s.
- The new plant would be designed to minimise its carbon emissions, through both construction and operation phases, through the application of a whole life carbon assessment.
- The flexibility provided through the DCO would allow for further opportunities to improve the efficiency of the design and reduce carbon emissions further through water technology innovations.
- The District Council notes that the proposed new plant would be able better to maximise energy recovery than the current facility such as through the generation of biogas, and when processed this can be used to heat the homes of the local community as a renewable fuel source.
- The proposed new plant would better be able to address the impacts of climate change than the current facility, in particular, it would be able to counter the impact of the occurrence of more frequent and extreme storm events, through its capacity to treat a greater volume of storm

flows, and to a higher standard than would be the case at the existing facility.

- The proposals deliver comprehensive environmental mitigations, in the form of extensive landscaping over approximately 70 hectares alongside the potential of 20% BNG⁷ through the creation of new woodland and grassland habitats and improved and replacement hedgerows.
- The new public spaces and enhanced public access routes on and beyond the site will add to local open spaces provision and improve connectivity for sustainable travel and recreation over existing provision. This would also be benefit from the incorporation of improved recreational access and connectivity both to and within the area surrounding the new plant compared with currently.
- The proposals include the provision of the 'Discovery Centre' to improve education in relation to water management and stewardship in a water stressed area of the Country where careful use of water is of growing significance. The public, especially the younger generation, will get an opportunity to learn about the importance of water management which is a further benefit.

Alternatives

22. The District Council recognises that one of the issues the ExA may need to explore is that of reasonable alternatives to the relocation of the existing CWWTP and in particular what the District Council's position is in light of the above and the clear contribution the DCO project makes towards achieving the objectives currently contained within the emerging joint GCLP.

⁷ Biodiversity Net Gain

23. The evidence base supporting the emerging GCLP is clear⁸. This concludes, of all the options considered, the NEC site (which includes the existing CWWTP site as noted above) is the most sustainable location for development in the area
24. However, the District Council recognises that it would have to review the situation in the event that the release of the existing CWWTP site does not occur for some reason, for example if the SofS decides to refuse to grant the DCO or if there are delays to the release of the existing CWWTP site or indeed if the applicant decides not to implement the DCO.
25. In such an event, should the relocation of the CWWTP not occur, both the District Council and Cambridge City Council would have to try and identify and allocate other land within Greater Cambridge to meet the area's strategic requirements for housing and employment.
26. If this was to align with the approach adopted to date for the development strategy in the emerging GCLP (i.e., to promote sustainability through provision of sustainable travel) this would likely include consideration of other strategic locations, including the Edge of Cambridge in the Green Belt and New Settlements with high quality public transport connections to Cambridge. It is clearly not a matter for the ExA to determine. The clear conclusions drawn by the GCLP evidence base however is that that the NEC location (of which the existing CWWTP forms the major part) is the most sustainable location for future development.
27. With respect to the alternative sites considered by Anglian Water for the location of the new plant and which were ultimately rejected, this optioneering is set out in the Site Selection Report (Non-technical Summary) [Doc 7.3].

⁸ Greater Cambridge Local Plan Consultation Statement Development Strategy Update (Regulation 18 Preferred Options) January 2023

28. The District Council considers the applicant followed thorough and systematic criteria-based approach to both the initial identification of potential sites and to the final site selection. This provided robust justification for why areas of search were identified and dismissed or taken forward. The final site selection was also the subject of comprehensive public consultation and engagement.

NPPF and Green Belt Policy

29. The District Council notes that under the 2008 Act local development plan policy as well as national policy (set out in the NPPF) has a different role in respect of the assessment of future development than under the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004 (see NPPF para 5⁹).

30. The NPPF however recognises that policies within the NPPF may amount to "*other matters that are relevant*" under the 2008 Act.

31. Both sections 104 and 105 of the 2008 Act require the Secretary of State to take into account "*any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision*" (see s104(2)(d) and s105 (2)(c)) and it is the District Council's view that in this instance Green Belt policy as set out in section 13 of the NPPF clearly fall within that definition.

32. The ReCWWTP site is clearly located in the Green Belt north of the A14 between Fen Ditton and Horningsea.

33. The proposed new ReCWWTP, as it amounts to new built development, constitutes "inappropriate development" in the Green Belt as defined by the

⁹ NPPF 5 "*The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework)*"

NPPF [para 149] and in the view of the District Council does not meet any of the exceptions to that definition in NPPF 149 and 150. It is therefore by definition harmful to the Green Belt and requires demonstration of very special circumstances.

34. The District Council notes that the applicant considers that a *“number of the elements of the project... fall within the exceptions listed at paragraph 150 of the NPPF”* (ref Planning Statement (DOC ref.7.5 [4.8.34]. This is on the basis that these elements *“preserve the openness of the green belt and do not conflict with the purposes of including land in the Green Belt”* (see NPPF 151). The elements listed are *“the transfer tunnels, proposed access roads to the WWTP and connecting infrastructure and the discharge point”*.
35. The applicant submits that the access roads are *“local transport infrastructure which can demonstrate a requirement for a Green Belt location”* 4.8.34]. The District Council considers that even if it were accepted that the access roads require a Green Belt location, the application still needs to satisfy the other part of the NPPF exception test which requires they *‘preserve its openness and do on the basis not conflict with the purposes of including land within ..[the Green Belt]’* (NPPF paragraph 150).It is therefore the District Council’s view that the ExA will need to satisfy itself on this specific matter

Biodiversity (ES Chapter 8) [Doc ref 5.2.8]

36. The District Council has considered the Biodiversity Net Gain (BNG) report at Appendix 8.13 [Doc ref 5.4.8.13] and the Biodiversity Chapter of the ES [Doc ref.5.2.8]. The outcome of the calculation shows that all three measures (habitat, hedgerow, and river) will achieve a net gain in measurable biodiversity when applied to areas within the redline boundary. However, the report also recognises that there are “trading down” issues relating to the approximately 3% net gain in river units.

37. The report recommends that an offsite solution to the river unit is found and that a further 17% of measurable net gain is acquired. The District Council considers that this is acceptable in principle, but a solution is yet to be presented by the applicants. Once agreed, this should be secured through a section 106 planning obligation pursuant to the 1990 Act.
38. In respect of the ES Chapter 8: Biodiversity, the District Council notes Table 2-8 and expects to require further clarification on specific details directly in relation to this with the applicant ahead of the examination.
39. The District Council has not had an opportunity to consider the following documents due to confidentiality issues resulting in a delay with them being shared following the submission of the DCO application.
- Appendix 8.4: Ornithology Baseline Technical Appendix
 - Appendix 8.8: Badger Technical Appendix
40. In addition to the above, a Preliminary Ecological Appraisal undertaken in 2020 has been referenced in several appendices (e.g., Appendix 8.1: Aquatic Technical Appendices, Appendix 8.11 Great Crested Newt Baseline Technical Appendix. This has not however been submitted, either as the original document, or an updated version.
41. The District Council will reserve its comments on the above matters for the Local Impact Report.

Climate Resilience (ES Chapter 9) [Doc ref 5.2.9]

42. The District Council has considered the climate resilience chapter of the Environmental Statement (ES) and acknowledges that it identifies the parameters of the climate assessment (from a sustainable construction point of view) rather than water resources or flooding and drainage related issues.

43. In general terms, the District Council is satisfied with the approach to assessing climate resilience and the use of the Institute of Environmental Management and Assessment (IEMA) EIA Guide to Climate Change Resilience and adaptation 2020 and IEMA methodology for in-combination climate impacts (ICCI). The use of the Rochdale parameters for the assessment is also considered to be an appropriate method to address the need for flexibility within the emerging design.
44. The District Council also supports the use of the two assessment methodologies employed by the applicant for identifying risks of extreme weather on infrastructure and processes as well as the impact of the project on the environment and community.
45. The District Council also agrees with the future baseline of 2090's (2090-2099), reflecting the fact the project has no definitive end of life. The use of the highest emissions scenario available, ensuring assessment is carried out on the 'worst-case scenario' is also supported. However, the District Council considers this should align with the climate scenarios used to predict the operational carbon emissions of the site to ensure consistency. It does not currently do so.
46. The mitigation measures proposed [set out within Chapter 9 DOC ref.5.2.9 para. 2.8] are considered by the District Council to be thorough and focus on the flexibility of the site and design to ensure capacity to expand, responding to the effects of climate change over time as well as more immediate severe weather situations. The District Council has encouraged and supported calls for the early delivery of measures to reduce/remove incidences of releases of untreated foul water into the rivers in storm conditions given the impact on water quality.
47. Secondary mitigating measures mainly focus on management plans which look at monitoring and management of impacts during the operational phase. The District Council agrees that these should be excluded from the assessment. However, the management plans outline more responsive

measures rather than pro-active. It is important, in the District Council's view, that they are secured either by way of a requirement or S106 agreement given the role they play in ensuring the proposed ReCWWTP and its claimed improve resilience are fully delivered when the plant is operational.

48. The District Council notes the elements that have been scoped out of the assessment [para.2.7 and Table 2.8 of Climate Resilience chapter of the ES] including construction and decommissioning. At this stage, it is the District Council's view that decommissioning of the proposed ReCWWTP should be included as part of the assessment.

Carbon (ES Chapter 10) [Doc ref 5.2.10]

49. The District Council is broadly satisfied with the applicant's approach to assessing carbon emissions set out in [DOC ref. 5.2.10 para.2.2] and the use of the Institute of Environmental Management and Assessment (IEMA) EIA Guide to Assessing Greenhouse Gas Emissions and their significance (2022).
50. The parameters of the assessment, [DOC ref.5.2.10 para.2.6] including capital carbon from construction, transport of materials and construction works, emissions from land use change as well as the operation of the proposed WWTP are considered to be reasonable.
51. The elements that have been scoped out, including construction and decommissioning are agreed subject to issues raised below. It is considered in general terms however that a clear rationale has been provided to support the applicant's approach.
52. The District Council notes considerable public discourse on this issue and considers that the following matters should be explored and recommends the ExA seek their resolution:

- Decommissioning of the proposed WWTP has been excluded from the carbon assessment due to the long lifespan of the development. It is noted that there are no proposals for decommissioning before 2050 making attempts to quantify carbon emissions associated with this difficult. Although the District Council agrees that quantifying these emissions would be a best estimation, the implications of decommissioning should form part of the whole life carbon assessment.
- The District Council acknowledges that the proposed CWWTP development is designed for a long working life with the ability to adapt and expand in the future. This is positive from a climate resilience perspective, but consideration should be made for quantifying the carbon impact of possible future expansion plans. Although it is assumed that expansion plans would be subject to separate planning applications if and when required, the District Council recommends a section should be included within the whole life carbon assessment relating to future development of the site and the potential carbon emissions resulting from this as this may impact on the deliverability of net zero aspirations.

53. The District Council agrees with the baseline options for assessing the carbon emissions from the operation of the site, Development Milestone Zero ('DM0') and Proposed ReCWWTP.
54. The proposed CWWTP involves the transfer of biogas produced by the facility to National Grid and is the preferred option, with DM0 option looking at the use of the biogas on site through Combined Heat and Power ('CHP') to reduce the power demand of the development. The latter would arise if the preferred option becomes unfeasible for any reason. The District Council agrees with the decision to disregard the use of solar PV from the operational carbon footprint as the configuration of this is yet to be confirmed.

55. The District Council considers that the approach provides a worst-case scenario that clearly demonstrates the carbon benefits of biogas to the grid, aligning with Anglian Water's stated commitment to reduce emissions to net zero in operation by 2030.
56. The District Council considers that the proposed mitigating measures set out at [para.2.9] are adequate. These measures focus on development design, in line with the target to deliver a net zero carbon development. The District Council considers carbon should be a primary metric of the evaluation process during the development design.
57. Whilst the use of the "Rochdale envelope" parameters by the applicant as part of this DCO process is appropriate, the District Council is of the view that it is essential to ensure that the DCO drafting allows for a continual process of refinement of information and data provided to the District Council. As the scheme moves towards detailed design, the most accurate information should be made available to inform the development.
58. The District Council notes that mitigation is proposed to be controlled through the Order provisions as well as ensuring further carbon reductions will be achieved through later design stages and onsite construction activities (e.g., 22% shortfall in construction phase target). Those provisions, in the District Council's view, need also to ensure account can be taken of this continually evolving area in relation to design, uncertainty in future energy policy, and the impact on future carbon intensities. An outline of the timescales for monitoring; reviewing and updating the carbon emissions associated with this project will be required to ensure the most accurate information is available to inform the development and ensure the scheme is meeting standards and targets in relation to carbon. The District Council will therefore seek to ensure the DCO does indeed encapsulate these important measures when the ExA comes to consider the terms of the Order.

Community (ES Chapter 11) [Doc ref 5.2.11]

59. In respect of to the Chapter 11 of the ES (Community), the District Council is generally in agreement with the methodology employed by the applicant. The District Council supports the inclusion of an on-going Community Liaison Plan with the status of this as a live document.
60. In respect of the Public Rights of Way the District Council notes that that the extension to the B1047 does not include equestrian use. The District Council considers that if the public benefit of the proposals is to be fully realised, it would be beneficial to include bridleway use as part of this circular route which would connect to new developments at Marleigh as well as Cambridge.
61. In addition, in terms of equestrian interests, the extent of the proposed new bridleway as part of the disused railway [Appendix 8.1.4 of Chapter 8 of ES] need to be considered. This should also form part of the biodiversity and landscape enhancements of this part of the area [para.3.4.11 of the LERMP].
62. The District Council wishes to ensure that adequate provision is made within the DCO to ensure cycle use by employees of the proposed CWWTP.
63. The District Council also wishes to ensure that the ExA is able to assess the impact of the recreational pressure on the Low Fen Drove grassland and hedges County Wildlife Site referred to in the LERMP [DOC ref.3.4.9. Para 3.4.11 considers the potential mitigation measures but this may not be sufficient to redirect footfall as this route is heavily trafficked.
64. Based upon local patterns of use of existing public rights of way, especially by dog walkers, informal car parking areas have emerged using rural hardstanding areas close to the site. The expansion of and improvements to existing and proposed new rights of way poses a potential risk of

intensification of car bourn visitors to the area for the purpose of using these rights of way for recreation. Further consideration of the most appropriate means to manage this issue will, the the view of the District Council, be required to be addressed by conditions or other measures. Any such measures will also need to be kept under review.

Health (ES Chapter 12) [Doc ref 5.2.12]

65. The District Council agrees with the approach to the assessment and the methodology used as outlined in Chapter 12 of the ES (Health). The District Council is also satisfied with the geographical study area, temporal scope and the baseline study. The elements which have been scoped out, which provide clear rationale for the decision are also supported. The District Council also support the measures adopted as part of the proposed development as well as the Baseline environment outlined in Chapter 3.
66. The District Council notes that although the Gypsy, Roma, Traveller population have been scoped in as part of the assessment but, it is unclear from the stakeholder engagement if any proactive engagement was undertaken with this community. It is acknowledged that numerous stakeholders were approached with regards to the application, however little feedback was received in response. The District Council will therefore ask the ExA to require clarity on what if any further attempts were made to ensure input was received from as wide a range of stakeholders as possible.
67. In respect of Traffic Plan Monitoring (Chapter 5.1.9), the reports states that controls will be put in place to prevent construction traffic from travelling through Horningsea and Fen Ditton. The CMTP also sets out that construction traffic must avoid the AM and PM peak periods as well as school pickup and drop off hours. The District Council will expect details on how this will be monitored, reported and enforced throughout the construction and operation phases of the development, to be made clear at the examination stage.

68. The District Council will also seek to ensure an effective community liaison plan is put in place to enable proactive engagement with local communities and users throughout the construction and operation phases.
69. In respect of the mental health and wellbeing assessment as part of this Chapter of the ES, the District Council is satisfied that baseline measurements have been taken (page 13). However, it is noted that no specific reference has been included in chapter 5.2 of this chapter as to how mitigation would be secured or when further assessments would be undertaken to monitor change. The District Council considers this information needs to be provided and secured by DCO requirement.

Historic Environment (ES Chapter 13) [Doc ref 5.2.13]

70. In respect of Chapter 13 (Historic Environment) of the ES [doc ref [5.2.15], the District Council offers the following comments:
- Paragraph 4.2.12 of Historic Environment ES Chapter 13, the District Council notes that the magnitude of impact assessed in respect of Biggin Abbey, which is a Grade II* listed building, resulting from the construction of the new ReCWWTP has been assessed as a “temporary minor adverse impact”. It is also noted that Table 2-2 [of DOC ref.5.2.13] states that this equates to a small change in the assets setting. The District Council considers that this conclusion, given the period of construction, does not adequately reflect the level of impact on this Heritage Asset of high heritage value.
 - Paragraph 4.2.43 of Historic Environment ES Chapter 13, the District Council in the Baits Bite Lock Conservation Area Appraisal [ref HE095] notes it provides an “important view east to Biggin Abbey”. The proposed development is said to “*slightly detract*” from this view. It is not clear

whether the use of 'slightly' in this case is an assessment of significance as per the table at 2.3. and further clarity is needed.

- Paragraph 4.3.5 identifies that the operation of the proposed development will result in negligible adverse impacts to the relevant heritage assets (i.e.). It acknowledges that the impacts would occur as a result of changes to the setting of the heritage assets which will reduce its contribution to their heritage value. It is also noted in paragraph 4.3.6 that the new lighting requirements and increased traffic movements will adversely affect the heritage value of the assets. As a result of the above, it is the opinion of the District Council that the changes do not equate to a negligible adverse effect but would instead be a minor/moderate adverse effect.

71. The District Council notes that in its overall assessment at para 5.6.1 the applicant concludes that *“the Proposed Development will cause less than substantial harm to designated heritage assets”* and that with *“the application of the primary, secondary and tertiary mitigation ... it is predicted that the level of harm...will be at the lower end of less than substantial harm”*. The District Council, whilst agreeing that the proposals will cause less than substantial harm for the reasons outlined above, consider the level of adverse effects identified through the assessments carried out where significant effects have been identified to Baits Bite Lock conservation area and to Biggin Abbey. These include the adverse effects from the proposed landscape mitigation to be greater than expressed in the applicant’s assessment.

Landscape and Visual Amenity (ES Chapter 15) [Doc ref 5.2.15]

72. The District Council considers that the Landscape and Visual Amenity assessment ('the LVIA') is generally acceptable and follows a standard methodology for the assessment of the various viewpoints and landscape designations.

73. The District Council, as noted above, accepts the use of the Rochdale envelope parameters as outlined in Section 2.7 of the ES Landscape Chapter (Ch15). However, the District Council seeks a number of clarifications and specific details which it will raise with the applicant and the ExA during the examination.

- The District Council has previously questioned the design approach and its use in this location. Noting that the applicants draw a different conclusion to the District Council on the suitability of the design approach to the landscape, the District Council also notes that the proposed landscape strategy accompanying the proposals is considered suitable. Concerns associated with the implementation and resilience of the landscape solution (including planting on the elevated bund) will require clarification from the ExA in the event that it concludes that the design approach to the plant is justified and appropriate. Consideration of alternative measures which can be employed should the trees and vegetation in this location fail to thrive should be included within the LERMP.
- Section 2.9 of the ES outlines the mitigation measures proposed with Table 2-7 referencing the LERMP. It is advised that the earth bank will be made up of soils excavated from the footprint and pipeline excavations. This statement is only within the Concept Plan description and is not repeated in the final design. Neither the LERMP nor the LVIA state whether this soil will be tested for appropriateness for the type of use proposed, particularly the planting. The District Council considers that this presents a risk that planting on the resultant bank will not mature or flourish in the manner envisaged and required to secure the landscape mitigation objectives. Further clarification on how this risk will be addressed will therefore need to be provided to the examination.

- The methodology identifies the language used for the various assessments such as Major, Moderate, Minor and Negligible, however, the body of the LVIA uses the terms Large, Moderate, Slight and Negligible. Clarification and consistency on the use of such terms will need to be provided throughout the examination process to match the methodology.
- The methodology references a number of guidance documents including GLVIA 3rd Edition. The Landscape Institute also produces a 'Technical Guidance Note 2/19 Residential Visual Amenity' which provide additional guidance for the assessment of impact on residential visual amenity. The District Council strongly recommend that this document is referenced and used in conjunction with the others in the assessment process.

Air Quality (ES Chapter 7) [Doc ref 5.2.7] Odour (ES Chapter 18) [Doc ref 5.2.18], and Lighting (ES Chapter 15)) [Doc ref 5.2.15]

74. In general terms, the District Council is satisfied with the scope, methodology and the initial conclusions derived from the Air Quality, the Odour, and the Lighting Chapters of the ES. More detailed assessment of impacts will be undertaken as part of the Local Impact Report.

Noise & Vibration (including Construction) (ES Chapter 17) [Doc ref 5.2.17]

75. In respect of Chapter 17 of the ES (Noise and Vibration) the District Council is generally satisfied with the scope, methodology and conclusions derived.
76. The District Council notes that the Construction and Environment Management Plan ('the CEMP') makes reference to S.61 of the Control of Pollution Act 1974 and consent being sought pursuant to that provision. The District Council considers that this should be clarified owing to the

potential dual regulation through both the planning and environmental health legislation). The District Council recommends that the CEMP provides the primary regulatory framework for the developer to operate within rather than utilising the S.61 consent through the Control of Pollution Act 1974.

77. It was noted that within the CEMP, that there is no information for the applicant to notify the District Council of any complaints received other than through liaison meetings with third parties. As such, the District Council recommends that regular monitoring through the Council's Environmental Health department should instead or in addition be secured through DCO requirements.
78. In general terms the District Council, accepts the working hours identified given the relatively remote location of the new site and transitional works. It is noted that the report identifies sections of the transitional work where there may be some impact on the receptors, and this appears to be considered and mitigation is proposed to reduce the impact of this.

Traffic & Transport (ES Chapter ES chapter 19) [Doc ref. 5.2.19]

79. The District Council notes the response of Cambridgeshire County Council as the Highway Authority for the area to the proposals. Notwithstanding the conclusions of the Local Highway Authority on the transport matters, there remain a number of areas that the District Council expects to comment further upon as follows:
- It is noted that the development will involve large and heavy vehicles using existing roads which are used by pedestrians, equestrians and cyclists (including the B1047 (Horningsea Road). As such, this presents considerable risk of conflict that needs not be minimised both thorough the design and management of vehicle speeds and flows across junctions and along links.

- The development is likely to result in temporary or extended closure of rights of way close to the construction site. It is important that through the CEMP, such closures are minimised, and safe alternative links provided where possible to ensure that safety of users of the rights of way and access to key infrastructure such as Fen Ditton School is not compromised.
- The application seeks to demonstrate how the assessment of access options to the site was undertaken. The proposed access arrangements use local road access to/from the A14 and the alternation of junctions that will increase heavy vehicle movements at and across existing local road junctions. The District Council has expressed concerns over such arrangements and the potential conflict that this gives rise to, in comparison with a direct vehicle access from the A14.
- The District Council remains concerned that the proposed access solution has the potential to give rise to “rat running” during both construction and operation phases of the development. Effective control of arrival and departing vehicles (especially heavy vehicles) will be required alongside a monitoring process for enforcement if adverse environmental and safety effects are not to arise. The mechanism for implementing, managing and monitoring such a process should be developed with input and engagement from the District Council.

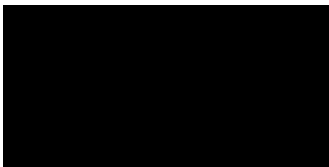
CONCLUSION

80. The comments raised through this relevant representation serve to set out the District Council’s position and its views as to where the main issues in respect of this DCO application arise. The District Council has also sought to indicate those areas where further consideration, clarification and review

of the DCO application is required as the proposals proceed through examination.

81. The District Council will continue its existing dialogue with the applicant and keep the ExA informed of any matters raised in this representation or generally are either resolved, progressed or where issues remain (or indeed if new issues arise).
82. The District Council will also seek throughout the examination to assist the ExA as best it can to enable the ExA to carry out as thorough and well-informed examination as possible and to help ensure that the DCO application and the evidence is as clear as possible.
83. Whilst the District Council supports the DCO scheme it recognises that it is for the ExA to carry out the assessment of the DCO application in accordance with the relevant statutory tests under the 2008 Act and make its recommendations to Secretary of State, who is the ultimate decision maker.

Yours faithfully



Stephen Kelly
Joint Director of Planning and Economic Development
On behalf of
South Cambridgeshire District Council