Local Impact Report – Cambridge Waste Water Treatment Plant Relocation Project (CWWTPRP)

Cambridgeshire County Council

20 November2023

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Glossary of Acronyms

BNG	Biodiversity Net Gain
CCC	Cambridgeshire County Council
CCS	Carbon Capture and Storage
CEMP	Construction Environmental Management Plan
CHP	Combined heat and power
City C	Cambridge City Council
CPCA	Cambridgeshire and Peterborough Combined Authority
CPO	Compulsory Purchase Order
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DMRB	Design Manual for Roads and Bridges
ES	Environmental Statement
ExA	Examining Authority
FRA	Flood Risk Assessment
GHG	Greenhouse Gases
GLVIA	Guidance for Landscape and Visual Impact Assessment
HERCS	Housing Estate Road Construction Specification
HGV	Heavy Goods Vehicle
HWICS	Health and Wellbeing Integrated Care Strategy
IDB	Internal Drainage Board
LCA	Landscape Character Assessment
LCWIP	Draft Local Cycling and Walking Infrastructure Plan
LEMP	Landscape and Ecology Management Plan
LHA	Local Highway Authority
LIR	Local Impact Report
LLFA	Lead Local Flood Authority

LTP	Local Transport Plan
LTPC	Cambridgeshire and Peterborough Local Transport and Connectivity Plan
LVIA	Landscape and Visual Impact Assessment
MWLP	Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021
MWPA	Minerals and Waste Planning Authority
NCR	National Cycle Route
NG	National Grid
NMU	Non-motorised User
NPPF	National Planning Policy Framework
NPS EN	National Policy Statement for Energy
NPS WW	National Policy Statement for Waste Water
NSIP	Nationally Significant Infrastructure Project
OMP	Odour Management Plan
PINS	Planning Inspectorate
PROW	Public Rights of Way
ROWIP	Rights of Way Improvement Plan
RR	Relevant Representation
S106	Section 106 legal agreement
S278	Section 278 Highways Agreement
SAC	Special Area of Conservation
SCDC	South Cambridgeshire District Council
SoCG	Statement of Common Ground
SSSI	Site of Special Scientific Importance
TA	Transport Assessment
WHO	World Health Organisation
WRAP	Waste Resources and Action Programme
WWTP	Waste Water Treatment Plant

Overview

Introduction

1.1 This report constitutes the Local Impact Report of Cambridgeshire County Council ('CCC'; or 'the County Council') as for the purposes of the application for this proposed Development Consent Order (DCO) it is a local authority falling within section 56A of the Planning Act 2008. Cambridge City Council (City C) and South Cambridgeshire District Council (SCDC) which also fall within s56A will be submitting separate Local Impact Reports (LIRs) covering the impact specific to their administrative areas. The County Council, the City C and SCDC are jointly represented and continue to work closely together. The LIRs should be read together. Where appropriate, the LIRs reference each other to avoid duplication. The LIR will also make reference CCC's response to the First Written Questions of the Examining Authority (ExQ1), where appropriate.

1.2 The County Council is the upper-tier local authority for the county of Cambridgeshire as a whole. As such it has a variety of statutory roles and responsibilities providing services and discharging regulatory functions, which affect a great many aspects of the built, natural, and social environments. These functions include in particular acting as the relevant Waste Planning Authority, Minerals Planning Authority, and County Planning Authority. It is also the Waste Regulation Authority; Local Highway Authority, Traffic authority, Transport authority, [1] Lead Local Flood Authority, Fire Authority (including public safety), Public Health Authority, Education Authority, and Social Services Authority. CCC also holds the responsibility for maintaining the Definitive Map in respect of public rights of way across the county and the Historic Environment Record. The Cambridgeshire Waste Water Treatment Plant Relocation (CWWTPR) proposal falls within the administrative boundary of CCC.

1.3 In preparing this LIR, the County Council has had regard to the definition and purpose of LIRs as set out in s60(3) of the Planning Act 2008 (as amended) and the Department for Housing Communities and Local Government guidance for the examination of applications for development consent and the Planning Inspectorate's (PINS) Advice Note One: Local Impact Reports.

1.4 The County Council is familiar with the process of Development Consent Order applications under the Planning Act 2008 as a relevant authority for the DCO applications in respect of the A14 Cambridge to Huntingdon Improvement Scheme and A428 A428 Black Cat to Caxton Gibbet Road Improvement Road Improvement scheme, as well as more recently the Sunnica Energy Farm and the Medworth Energy from Waste Combined Heat and Power Facility.

[1] The Cambridgeshire and Peterborough Combined Authority (CPCA) are the Strategic Transport Authority for Cambridgeshire and Peterborough.

Purpose and Structure of this report

1.5 This report will not describe the proposed development itself but relies on the Applicant's detailed description of the development, as set out in the DCO application documents.

1.6 Section 60 (3) of the 2008 Planning Act defines the purpose of Local Impact Reports as: "*a report in writing giving details of the likely impact of the proposed development on the authority's area.*"

1.7 This report describes the local impacts of the proposed development under headings by topic, which follow the topics and order set out in the Applicant's Environmental Statement (ES). The key issues and impacts are identified under each topic, followed by the Council's views and commentary on the likely impact of the proposal with reference to the application documentation, including the DCO articles, requirements, and obligations.

1.8 For each topic area, this report sets out:

- Local policy context
- The positive, neutral, and negative impacts of the development during each phase of the development (the construction, operation, and decommissioning, as anticipated by the County Council)
- The suitability and adequacy of the measures proposed by the Applicant to avoid, reduce, mitigate, or compensate for the identified impacts
- Where applicable, proposals by the Council for alternative or additional measures to better address the identified impacts, and,
- The need for obligations and requirements.

1.9 As set out above, this is a report by Cambridgeshire County Council and reflects the assessment and views of that council alone.

1.10 The contents of this report builds upon the Relevant Representation (RR) submitted by CCC [RR-001].

Description of the Area

1.11 A detailed description of the development is provided in the ES Chapter 2, Project Description (Doc Ref 5.2.2 [APP 034] however the County Council would highlight the following details of each of the key elements of the project and their respective sites and locations.

1.12 **The existing Cambridge Waste Water Treatment Plant (CWWTP)**: This Victorian 40-hectare brownfield site is located within North East Cambridge. Some areas of the existing Cambridge CWWTP contain structures which are no longer in use as part of the waste water treatment process and so are non-operational assets.

1.13 **The proposed Relocation of the Waste Water Treatment Plant**: The site for the proposed relocated Waste Water Treatment Plant (WWTP) is a greenfield site, located to the north-east of Cambridge and 2km to the east of the existing Cambridge CWWTP. It is situated on arable farmland immediately north of the A14 and east of the B1047 Horningsea Road. It lies within the Cambridge Green Belt between the villages of Horningsea to the north, Stow cum Quy to the east and Fen Ditton to the south west. The A14 (a major trunk road that connects the North, the Midlands to the East of England) cuts through the landscape, rising to cross the River Cam over a bridge.

1.14 **The proposed final effluent discharge outfall on the River Cam**: This area would be located immediately north of where the A14 bridges over the Cam where the final effluent tunnel reaches the river. The land required for the construction of the final effluent and storm pipelines connecting to the outfall includes a narrow strip of land required for construction between the A14 and Biggin Abbey and comprises arable fields and rough pasture.

1.15 **The two new pipelines (rising mains) for the transfer of waste water to the proposed relocated Waste Water Treatment Plant (WWTP) from Waterbeach**: This would pass beneath open, arable farmland with large fields bordered by farmland tracks, tree belts and hedgerows with mature trees, drainage ditches. It crosses under the West Anglian Mainline (WAML) railway and River Cam, east of Waterbeach. The route of the pipelines passes under Low Fen Drove Way and through the land required for 'main site' construction activities before passing under the A14.

1.16 **Land required for the construction of a temporary intermediate shaft**: This is to the west of an existing drainage ditch that passes through the existing CWWTP on an area of cultivated land. Land required for the connection to the transfer tunnel and sewer diversions is in a previously developed area of hardstanding with some areas of amenity grassland.

Planning Policy

National Planning Policy

National Policy Statement for Waste Water (NPSWW) and National Policy Statement for Water Resources Infrastructure (NPSWRI)

2.1 National policy for the provision of nationally significant waste water infrastructure projects is to be found in the National Policy Statement for Waste Water (NPSWW) published in March 2012. The NPSWW sets out the need for, and Government's policies to deliver Nationally Significant Infrastructure Projects (NSIP) as defined in the Planning Act 2008 for waste water infrastructure projects in England (as well as identifying specific waste water NSIPs). It refers also at Footnote 6 to the Secretary of State's powers under section 35 of the Planning Act 2008, where the Secretary of State considers that a waste water project is of national significance, either by itself or when considered with one or more other projects or proposed projects in the same field, for such development to be treated as development for which development consent is required.

2.2 The NPSWW sets out planning guidance to guide applicants for nationally significant waste water infrastructure schemes to conform with the Government's strategic requirements, aims and objectives.

2.3 The National Policy Statement for Water Resources Infrastructure (NPSWRI) was designated on 18 September 2023. This sets out the need and Government's policies for, development of nationally significant infrastructure projects for water resources in England. It provides planning guidance for applicants of nationally significant infrastructure projects for water resources, as defined in the Planning Act 2008 ('the Planning Act').

2.4 The Council understands that the Examining Authority may well wish to establish whether the NPSs have "effect in relation to development of the description to which the application relates" or not in accordance with section 104 or section 105 of the Planning Act 2008, this is however in the Council's view not a matter for the LIR.

2.5 Under both section 104 and section 105 the LIR is something that must be taken into account by the Secretary of State. In addition, where it is concluded that an NPS does not have effect but is relevant to a proposed DCO development it would appear to fall within the category of matters which are "both important and relevant to the Secretary of State's decision".

2.6 National Planning Policy for Waste (NPPfW) sets out detailed waste planning policies which the Government states "should be read in conjunction with the National Planning Policy Framework, the Waste Management Plan for England and National Policy Statements for Waste Water and Hazardous Waste, or any successor documents" [paragraph 1].

2.7 It also states that all local planning authorities should have regard to NPPfW policies when discharging their responsibilities to the extent that they are appropriate to waste management.

2.8 The NPPfW sets out guidance with regard to the preparation of waste local plans at paragraphs 2-6.

2.9 In terms of decision making the NPPfW at para 7 states as follows:

"7. When determining waste planning applications, waste planning authorities should:

• only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where proposals are not consistent with an up-to-date Local Plan. In such cases, waste planning authorities should consider the extent to which the capacity of existing operational facilities would satisfy any identified need;

• recognise that proposals for waste management facilities such as incinerators that cut across up-to-date Local Plans reflecting the vision and aspiration of local communities can give rise to justifiable frustration, and expect applicants to demonstrate that waste disposal facilities not in line with the Local Plan, will not undermine the objectives of the Local Plan through prejudicing movement up the waste hierarchy;

• consider the likely impact on the local environment and on amenity against the criteria set out in Appendix B and the locational implications of any advice on health from the relevant health bodies. Waste planning authorities should avoid carrying out their own detailed assessment of epidemiological and other health studies;

• ensure that waste management facilities in themselves are well-designed, so that they contribute positively to the character and quality of the area in which they are located;

• concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced;

• ensure that land raising or landfill sites are restored to beneficial after uses at the earliest opportunity and to high environmental standards through the application of appropriate conditions where necessary."

National Planning Policy Framework (NPPF) 2023

2.10 The NPPF (2023) sets out the Government's planning policies for England and how these should be applied in practice to decision making and development plan making pursuant to the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004.

2.11 The NPPF at paragraph 4 states that it should be read in conjunction with the planning policy for waste and that when preparing plans or making decisions on waste development applications (ie under the Town and Country Planning Act 1990) where relevant. In addition at paragraph 5 it confirms that the NPPF *"does not contain specific policies for nationally significant infrastructure projects"* which *"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).”

Waste Local Plan and County Council’s Remit as Waste Planning Authority

2.9 The Planning Inspectorate guidance on preparing LIRs suggests that it is useful to set out relevant local plan policies that apply to the proposed development. The proposed development as a Waste Water Treatment Plant and Water Recycling Centre would, if it were not the subject of a direction under s35 of the Planning Act 2008 making it a project of national significance, be categorised as waste development and as such Cambridgeshire County Council as the Minerals and Waste Planning Authority would be the determining authority. Waste planning matters determined by the County Council are judged against the Council’s Local Plan for waste and minerals development, the Cambridgeshire and Peterborough Minerals and Waste Local Plan (MWLP) 2021 as well as the relevant Local District Plan policies. Waste development includes Waste Water Treatment Plants and Water Recycling Centres and if permission were being sought under the Town and Country Planning Act 1990 then any such application would be assessed against the MWLP and the relevant adopted local plan.

2.10 For completeness it should be noted that the Cambridge City Council Local Plan, South Cambridgeshire District Council Local Plans as well as emerging Greater Cambridge Local Plan and North East Cambridge (NEC) Area Action Plan (AAP) are relevant to the determination of planning applications for mineral and waste development in their respective administrative areas.

2.11 As referred to above the City Council and SCDC have provided separate LIRs which address their respective policies and should be read alongside this LIR.

Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) (MWLP)[2]

2.12 The MWLP was adopted in July 2021. It is a joint development plan with Peterborough City Council for the management of minerals and waste development for the plan period to 2036 setting out a series of objectives and strategic policies (see para 2.7 MWLP)

The MWLP provides a high level vision of ensuring a steady, adequate but sustainable supply of minerals to meet current and projected future need and for the provision of a network of waste management facilities which will provide for the sustainable management of all wastes to the achievement of net self-sufficiency. This will include

[2] https://www.cambridgeshire.gov.uk/business/planning-and-development/planning-policy/adopted-minerals-and-waste-plan follow link ‘Minerals and Waste Local Plan (Folder) for access to the MWLP and other documents.

striking a balance between meeting present and future needs, and maintaining and enhancing the social, environmental and economic vibrancy of the plan area (see para 2.1 on Vision in MWLP).

It also includes, a set of aims and Headline objectives (a total of 12 objectives under 8 themes) to ensure that the overall vision of the MWLP is achieved, that national policy is met and that local needs are addressed. The Headline Objectives comprise of:

- Ensure a steady and adequate supply of mineral to support growth whilst ensuring the best use of materials, and protection of land
- Contribute positively to the sustainable management of waste
- Support climate change mitigation and adaptation, and seek to build resilience to the potential effects of climate change
- Protect water resources and quality, mitigate for flood risk from all sources and seek to achieve a reduction in overall flood risk
- Safeguard productive land
- Support sustainable economic growth and the delivery of employment opportunities
- Reduce road traffic, congestion and pollution; promote sustainable modes of movement and efficient movement patterns; and provide and maintain movement infrastructure
- Conserve and enhance the quality and distinctiveness of the landscape
- Protect and encourage biodiversity and geodiversity
- Protect and where possible enhance the character, quality and distinctiveness of the built and historic environment
- Protect and enhance the health and wellbeing of communities
- Minimise noise, light and air pollution.

The following MWLP policies are considered relevant to the consideration of the proposed development under this LIR and referenced in this document:

- Policy 1: Sustainable Development and Climate Change
- Policy 5: Mineral Safeguarding Areas
- Policy 11: Water Recycling Areas
- Policy 17: Design
- Policy 18: Amenity Considerations
- Policy 20: Biodiversity and Geodiversity
- Policy 21: The Historic Environment
- Policy 22: Flood and Water Management
- Policy 23: Traffic, Highways and Rights of Way
- Policy 24: Sustainable Use of Soils

Other Relevant Local Policies and Strategies

Cambridgeshire County Council Priorities 2023-2024

The Strategic Framework 2023-2024 sets out CCC's vision and corporate ambitions. It is approved by the Full Council of its democratically elected joint administration. All Council decisions and policies are made within the context of this Framework.

CCC's Strategic vision is to: "*Create a greener, fairer, and more caring Cambridgeshire. This vision guides a 'decentralised' approach to CCC's relationships with partners, communities, and residents, so that Cambridgeshire can become greener, fairer, and more caring in the ways that are most suitable to the variety of people and communities we serve.*"

CCC has 7 ambitions to achieve the Strategic vision:

1. *Net zero carbon emissions for Cambridgeshire by 2045, and our communities and natural environment are supported to adapt and thrive as the climate changes*
2. *Travel across the county is safer and more environmentally sustainable*
3. *Health inequalities are reduced*
4. *People enjoy healthy, safe, and independent lives through timely support that is most suited to their needs*
5. *Helping people out of poverty and income inequality*
6. *Places and communities prosper because they have a resilient and inclusive economy, access to good quality public services, and social justice is prioritised*
7. *Children and young people have opportunities to thrive.*

CCC's Climate Change and Environment Strategy (published February 2022)

2.19 This Strategy outlines CCC's vision in relation to climate change and informs all of the Council's work. It is available to view in full on the County Council's public-facing website[3], it states the following:

"*Climate Change is a very real challenge for our communities, businesses, and nature. We believe that, as a Council, it is our responsibility to act now. We must: reduce the contribution the county is making towards Climate Change through our carbon emissions, support the development of resilient communities so that they can adapt to the impacts of climate change, and reduce our impact on the natural environment by supporting nature and biodiversity to thrive. We recognise, and take seriously, the opportunity we have to provide much needed local leadership to tackling the climate crisis in Cambridgeshire. This new Strategy is our commitment to working for and with people, communities, businesses, and all political parties to deliver - urgent action across Cambridgeshire. This ambition and our principles will provide a practical framework to guide creativity and collaboration. CCC has identified 9 priority areas to action:*

1. ***Communication and engagement*** *with Businesses and our communities*
2. ***New economic models*** *and sustainable finance*

[3] Climate Change and Environment Strategy - Cambridgeshire County Council https://www.cambridgeshire.gov.uk/residents/climate-change-energy-and-environment/climate-change-and-environment-strategy

3. *Energy efficient,* ***low carbon buildings***

4. ***Low carbon transport*** *– prioritising walking, cycling and public transport, and supporting the uptake of electric vehicles*

5. ***Waste and Pollution*** *- Reducing waste, minimising pollution, and rethinking how we deal with the waste we produce*

6. ***Green spaces****, restoring natural habitats and Beneficial land management*

7. ***Peatland -*** *developing understanding of the scale of the challenge and opportunities for management best practice*

8. ***Water management****, availability, and flood risk, to improve water quality while improving resilience to flooding and droughts*

9. ***Resilience of our services,*** *Infrastructure and supporting vulnerable people."*

2.20 The County Council has an additional ambition for Cambridgeshire to be Net Zero by 2045. The strategic approach to this is:

- *"We commit to ensuring the County Council delivers on its target of net zero emissions. This means achieving net-zero for our direct emissions and halving scope 3 emissions through our supply chains by 2030. We will take a broad and long-term view of initiatives in order to deliver the most sustainable change possible and lead by example.*

  Driving change through collaboration

- *We want to work transparently and in partnership with other organisations, businesses, and communities to support all sectors to reduce carbon emissions, benefit nature and take positive climate action. Aligning our efforts will bring greater impact for all of us.*

  Harnessing the power of our local communities

- *We will take a place-based approach to climate change. Local communities know their environment best and can identify solutions to local environmental challenges. Harnessing the power of local communities and local networks will enable all of us to amplify impact and support a socially just transition to net zero.*

  Carbon Literate Cambridgeshire

- *We will work to develop a county-wide understanding of carbon reduction so that people, communities, and businesses have the knowledge they need to identify and act upon nature based and other opportunities for carbon reduction and doubling nature".*

Cambridgeshire Green Infrastructure Strategy[4] (2011)

[4] Cambridgeshire Green Infrastructure Strategy - Cambridge City Council https://www.cambridge.gov.uk/cambridgeshire-green-infrastructure-strategy

2.21 This Strategy is designed to assist in shaping and coordinating the delivery of green infrastructure in the County to provide social, environmental, economic benefits now and in the future. This Strategy demonstrates how Green Infrastructure can be used to help achieve four objectives:

1) *To reverse the decline in biodiversity*
2) *To mitigate and adapt to climate change*
3) *To promote sustainable growth and economic development*
4) *To support healthy living and well-being*

"Green Infrastructure is part of our natural life-support system. It is the network of natural and man-made features such as open spaces, woodlands, meadows, footpaths, waterways, and historic parks, which help to define and to link the communities, villages, towns, and cities of Cambridgeshire with each other and to the surrounding landscape. Green Infrastructure is vital to quality of life for both existing and future residents of Cambridgeshire and is nationally acknowledged as an important element of well- designed and inclusive places."

Cambridgeshire & Peterborough Health & Wellbeing and Integrated Care Strategy[5] (HWICS)

2.22 The HWICS sets priorities to benefit health and wellbeing for residents. In 2022, Cambridgeshire County Council and Peterborough City Council agreed to form a Joint Health and Wellbeing Board. It collaborates with the Integrated Care Partnership, bringing together and creating a stronger local partnership around integrated health and social care.

2.23 The overarching mission of "All together for healthier futures" is supported by three overarching ambitions:

- *Have better outcomes for our children;*
- *Reduce inequalities in deaths under 75 years;*
- *and increase the number of years that people live in good health*.

2.24 The four priorities of the HWICS are:

- *Ensure our children are ready to enter education and exit, prepared for the next phase of their lives*
- *Create an environment to give people the opportunity to be as healthy as they can be*
- *Reduce poverty through better employment, skills, and housing*

[5] Joint Health and Wellbeing Integrated Care Strategy - Cambridgeshire County Council https://www.cambridgeshire.gov.uk/residents/adults/adults-services-strategies-and-policies/joint-health-and-wellbeing-integrated-care strategy#:~:text=In%202022%2C%20Cambridgeshire%20County%20Council,integrated%20health%20and%20social%20care.

- *Promote early intervention and prevention measures to improve mental health and wellbeing*

Local Transport Plan (LTP)[6]

2.25 The Cambridgeshire and Peterborough Combined Authority (CPCA) are the Strategic Transport Authority for Cambridgeshire and Peterborough, and the Cambridgeshire and Peterborough Local Transport Plan (January 2020) is the LTP which sets out the vision, goals, and objectives that define how transport will support the Cambridgeshire & Peterborough Combined Authority's Growth Ambition, and approach to meeting these objectives. The Plan will remain current until the adoption of the final Local Transport and Connectivity Plan.

2.26 The vision for the LTP is to deliver a world-class transport network for Cambridgeshire and Peterborough that supports sustainable growth and opportunity for all. The vision is intended to capture the aspirations for Cambridgeshire and Peterborough's transport network, reflecting our ambition to provide:

- '*A world-class transport network'* – Cambridgeshire and Peterborough aspire toward a transport system of the highest quality on a global stage, which meets the needs of residents, businesses, and visitors.
- '*Sustainable growth'* – the network will support the delivery of future economic and housing growth across the region that enhances overall quality of life, supports the transition to a Net Zero carbon economy and protects or enhances the environment.
- *'Opportunity for all'* – the network should support access to jobs, services, and education for all, irrespective of income, age, ability, location, or access to a car.

Cambridgeshire County Council Rights of Way Improvement Plan (2016 Update)[7]

2.27 The Rights of Way Improvement Plan (ROWIP) is a statutory document under the Countryside & Rights of Way Act 2000, which forms part of the CPCA's Local Transport Plan 3 (LTP3). The Plan is a strategy document that contains the vision of improved countryside access in Cambridgeshire and builds on the rights of way network to bring benefits to transport, tourism, the rural economy, social integration, health, and the environment.

2.28 The ROWIP recognises that demand for access to the countryside is growing and is becoming increasingly important due to its importance to the rural economy, public health and well-being and place-making as well as the significant contribution that the public rights of way network makes to the active travel agenda. Delivery of the Plan

[6] Local Transport Plan (LTP) - Cambridgeshire County Council https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/local-transport-plan

[7] Rights of Way Improvement Plan - Cambridgeshire County Council https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/rights-of-way-improvement-plan

requires a range of functions and organisations to work in partnership to achieve the strategic plans of the ROWIP in co-ordination with the emerging Active Travel Strategy and the LTP3.

2.29 The ROWIP's Statements of Action (SOAs) are intended to protect and bring about improvements to the rights of way network and countryside access. The following key SOAs are relevant to this Application:

- SOA2: A safer and health-enhancing activity: Countryside access provision should be safe for users and encourage healthy activities.
- SOA3: 72,500 new homes: new development should not damage countryside provision. Where appropriate, development should contribute to the provision of new links and/or improvement of the existing PROW network.
- SOA5: Filling the gaps: Countryside provision should build on the platform of the historical network to meet the needs of today's users, particularly equestrians, and land managers.

2.30 The ROWIP works in partnership with the existing Cambridgeshire & Peterborough Health & Wellbeing and Integrated Care Strategy.

National Policy

The Defra 25 Year Environmental Plan[8] (D25YEP)

2.31 The D25YEP sets out the government's plan to improve the environment within a generation, including details how this is to be achieved. It is this Government's ambition to leave our environment in a better state than we found it. The 25 Year Environment Plan outlines the steps we must take to achieve the ambition. The policies in Chapter 3 concern connecting people with the environment in order to improve health and wellbeing, they seek to enhance people's engagement with the natural world and to address inequalities in access, by opening up the mental and physical health benefits of the natural world to people from the widest possible range of ages and backgrounds.

2.32 The Covid pandemic has underlined the important role of nature for our health and wellbeing, particularly for those living in disadvantaged areas, and there is growing evidence to support the many beneficial effects of being outside, including reducing stress and increased physical activity. The relevant actions and outcomes detailed in Chapter 3 include:

"1. Helping people improve their health and wellbeing by using green spaces;

2. Encouraging children to be close to nature, in and out of school; and,

[8] 25-year-environment-plan.pdf (publishing.service.gov.uk) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

3. Greening our towns and cities."

2.33 Through increased engagement with nature, people come to care more about the natural environment and take steps to protect and enhance it. Delivery of the D25YEP outcomes depends upon engaging people with nature and supporting their behaviour change. Through engagement with the local community and provision, the proposed significant EfW facility has the opportunity to help address the requirements of the Plan.

TOPIC 1 Waste Management Specific Policies

Policy Context

Local Minerals & Waste Plan Policies - Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) (MWLP)

Policy 11 *of the MWLP Policy 11: Water Recycling Areas*

3.1 **Policy 11** of the MWLP is a Waste Management Specific Policy and confirms that existing Waste Recycling Centres *"are essential infrastructure"* which are identified on the MWLP Policies Map as Water Recycling Areas. Thereafter the policy provides support for the provision of new water recycling capacity in the county.

3.2 It states that proposals for new water recycling capacity or proposals required for operational efficiency, whether on Water Recycling Areas or elsewhere (with such proposals including the improvement or extension to existing Water Recycling Centres; relocation of Water Recycling Centres; provision of supporting infrastructure (including renewable energy); or the co-location of Water Recycling Centres with other waste management facilities) "*will be supported in principle, particularly where it is required to meet wider growth proposals identified in the Development Plan".*

3.3 It then goes on to set out a number of requirements that such developments must demonstrate. These are:

(a) ensuring that there is a suitable water course to accept discharged treated water and there would be no unacceptable increase in the risk of flooding to others;

(b) where a site is less than 400 metres from existing buildings normally occupied by people, an odour assessment demonstrating that the proposal is acceptable will be required, together with appropriate mitigation measures;

(c) the site should avoid land within flood zone 3 unless there is a clear and convincing justification not to do so, and the proposal is supported by thorough evidence of sustainability benefits, evaluation of site options and risk management through the application of the sequential and exception tests; and

(d) adequate mitigation measures will address any unacceptable adverse environmental and amenity issues raised by the proposal, which may include the enclosure of odorous processes.

3.4 The supporting policy text to Policy 11 at para 5.4 states that *"all existing and planned Water Recycling Centres (WRCs) are identified on the Policies Map as Water Recycling Areas (WRAs)"*.

3.5 The MWLP does not allocate the site identified in the DCO application for the relocation of the waste water treatment plant (WWTP) but historically, the previously adopted, Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) ('the MWCS') and Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Policies (2012)('the MWSSPP') document, took a similar approach to that of the MWLP and Policy 11, with additional context being provided in between paragraph 7.32 and 7.35 of the supporting text of the Minerals and Waste Core Strategy, (the section titled Waste Water Treatment Works in the MWCS can be found between

paragraphs 7.32 and 7.42 and Policy CS17 Waste Water Treatments works that follows paragraph 7.42)

"7.32 The planned growth of Cambridgeshire and Peterborough will require around a 17% increase in waste water treatment capacity. This would see capacity in the Plan area rise from 756,942 population equivalent (pe) in 2006 to around 908,557 pe by 2026.

7.33 The bulk of the new capacity required up to 2026 is needed to serve growth in and around Peterborough, Cambridge and Northstowe. In the case of the latter the waste water is planned to be treated at the Uttons Drove (Swavesey) Works.

7.34 Discussions with Anglian Water, the only sewerage undertaker operating in the plan area, have not revealed an operational need to identify new sites for waste water treatment works within Cambridgeshire and Peterborough, with the exception of the need for a new facility north of Ely to cater for planned growth and facilitate the redevelopment of the Lisle Lane area (where an existing works is currently located). They anticipate that much of the predicted growth identified in the RSS is likely to be accommodated by upgrading existing works.

7.35 Anglian Water, have however, indicated that there may be circumstances where the location of new growth makes access to existing waste water treatment works difficult using existing sewer infrastructure and it may be more cost effective to develop new works than seeking to utilise capacity at existing works. Until major growth areas are identified in the Local Development Frameworks being prepared by the district and city councils it is not possible to make this assessment. To make provision for this a criteria based policy is proposed. Once the major growth areas are known and the need, if any, for new works established, the Mineral and Waste Plan can be reviewed to make specific provision."

3.9 Land at Honey Hill, which is the proposed DCO application site for the relocation of the WWTP had in fact been proposed for allocation in the Draft Cambridgeshire and Peterborough Minerals and Waste Core Strategy Preferred Options Consultation Document (2006). In light of the above and the identification of a criteria based policy being appropriate, the proposed allocation did not progress into the Core Strategy submitted for examination. The Core Strategy was then adopted in 2011 following examination.

3.10 If a proposal for a new water recycling centre (WRC) were submitted to the County Council for determination then the key consideration would be an assessment whether the proposed development complies with Policy 11 of the MWLP. However, compliance with other relevant polices in the MWLP, compliance with policies in the relevant district local plan, compliance with the National Planning Policy Framework (2023) and the National Planning Policy for Waste, and other material planning considerations would also be considered as part of determination and professional judgement and reference to legislation and guidance would be used to decide what weight to give these in the planning balance. This would include applying Green Belt

policy as set out in the NPPF. There is as noted below no Green Belt policy within the MWLP.

Impacts by Issue

TOPIC 2 Agricultural Land and Soils

Policy Context

Local Minerals & Waste Plan Policies.

6.1 Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) ('MWLP'): **Policy 24** of the MWLP requires that development which adversely affects agricultural land categorised as 'best and most versatile' will only be permitted where it can be shown that: (a) it incorporates proposals for the sustainable use of soils (whether that be off-site or as part of an agreed restoration scheme); and (b) (for non-allocated sites) there is a need for the development and an absence of suitable alternative sites using lower grade land has been demonstrated.

6.2 The NPPF defines "Best and most versatile agricultural land" as land in grades 1, 2 and 3a of the Agricultural Land Classification.

Construction Phase Impacts

Positive

6.3 There are no positive impacts identified for the construction phase of the Proposed Development in respect of Agriculture Land and soils.

Neutral

6.4 There are no neutral impacts identified for the construction phase of the Proposed Development in respect of Agriculture Land and soils.

Negative

6.5 The land required for the construction of the proposed development of the Waste Water Treatment Plant (WWTP) is grade 2 and grade 3a agricultural land, deemed best and most versatile (BMV). For the construction of the Waterbeach Pipeline (60 Ha [App-038] Para 3.1.2) and the tunnel connection from the existing site (area not stated) there would be temporary loss of land for agricultural use.

6.6 The proposed development will result in the permanent loss of land for agricultural use of approximately 70 hectares (operational land, plus landscaping (Environmental Statement - Volume 2 - Chapter 2 - Project Description 1.5.2 [APP-034]).

6.7 The construction activities will affect the soil in the area of the proposed development. This is likely to degrade the soil in the short term as it would be disturbed. Impacts can include localised minor contamination or shallow soil impact from machinery or compound construction.

6.8 It is noted that an Outline Soil Management Plan is proposed [APP-083]. The Outline Soil Management Plan has however only surveyed the main site of the WWTP and has not taken auger borehole samples of the soil for both the Waterbeach Pipeline, final effluent pipeline, the outfall and waste water transfer tunnel connection. Whilst some

elements such as the transfer tunnel itself is at a depth to not effect the soil quality at the surface, there remain temporary impacts to the soil such as the pipeline which for completeness would benefit from understanding the soil quality.

6.9 [APP-038] 5.2.6 Env Statement Chapter 6 Agricultural Land and Soils, Paragraph 2.3.0.

> *"The study area for the ALC survey and soils comprised the maximum area of land permanently required for the construction, operation and maintenance of the proposed WWTP and landscape masterplan. Provisional ALC information and soil association mapping were consulted for the Waterbeach pipeline and final effluent pipeline, the outfall, waste water transfer tunnel and new access connecting with Horningsea Road. These sources of information were deemed suitable for areas with no permanent change to land use and for soils stockpiled in close proximity for less than 12 months on the understanding that a soil specialist is present on-site to monitor key soil management stages, or that a soil specialist has delivered appropriate training to the Contractor prior to the commencement of works."*

6.10 It is noted Requirement 9 of the Development Consent Order [App-009] has provision for the relevant planning authority to approve a detailed Soil Management Plan.

Operational Phase Impacts

Positive

6.11 There are no positive impacts identified for the operational phase of the Proposed Development in respect of Agriculture Land and soils.

Neutral

6.12 There are no neutral impacts identified for the operational phase of the Proposed Development in respect of Agriculture Land and soils.

Negative

6.13 As noted above the land required for the proposed Waste Water Treatment Plant (WWTP) and landscape is grade 2 and grade 3a agricultural land, deemed best and most versatile (BMV). The proposal will result in the permanent loss of this land for agricultural use of approximately 70 hectares (operational land, plus landscaping (Environmental Statement - Volume 2 - Chapter 2 - Project Description 1.5.2)

Mitigation

Draft Development Consent Order and Work Plans- Requirements and Obligations

6.14 The inclusion of Requirement 9 [AS-139] for the approval of a Detailed Soil Management Plan to accord with the Outline Soil Management Plan [AS-060] is welcomed to ensure appropriate measures are put in place.

TOPIC 3 Biodiversity

Policy context

Local Minerals & Waste Plan Policies.

5.1 Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) ('MWLP'): Policy 20 of the MWLP requires all development proposals to: conserve and enhance the network of geodiversity, habitats, species, and sites (both statutory and non-statutory); "*deliver a measurable net gain in biodiversity, proportionate to the scale of development proposed, by creating, restoring and enhancing habitats and enhancing them for the benefit of species*"; and where adverse impacts are unavoidable, they must be adequately and proportionately mitigated. And "*If full mitigation cannot be provided, compensation will be required as a last resort where there is no alternative*".

Other Relevant Local Strategies

Cambridge Nature Networks 2021

5.2 Cambridge Nature Network 2021 identifies strategic green infrastructure opportunities to enhance access to nature across the Nature Network for the growing population, identified by five Priority Areas. The proposed new waste water treatment plan falls within the Wicken Fen Vision South Priority Area, proposed for species-rich grassland and wildlife-friendly farming. The outfall / pipeline works fall within the ich meadows. and River Cam Corridor Priority Area, which identifies potential for river restoration projects upstream of Cambridge (upstream of the existing / proposed waste water treatment works).

5.3 The Cambridge Nature Network should be utilized in scheme design and prioritizing deliver of strategic biodiversity. It has been utilized within the Biodiversity Net Gain assessment to determine the strategic significance of the habitats to be lost / proposed.

Construction Phase impacts

Positive

Biodiversity Net Gain (BNG) - terrestrial habitats

5.4 The Applicant has committed to delivering 20% Biodiversity Net Gain (BNG), which aligns with the aspirations set out in the Greater Cambridgeshire's Biodiversity SPD. In

order to meet this target, the scheme will need to deliver 20% BNG across all three BNG units – area-based, hedgerows and river.

5.5 The BNG Assessment Report [AAP-098] shows that the scheme has the potential to exceed these targets for area-based and linear habitats (delivering increases of 41.27% and 20.51% BNG, respectively).

5.6 But currently, there appears to be no mechanism within the proposed Landscape, Ecological and Recreational Management Plan ('LERMP') [AS-066] to ensure how the detailed design / habitats will ensure 20% BNG will be delivered. We recommend the detailed LERMP incorporates a BNG plan and demonstrates how habitats will meet the BNG criteria.

Biodiversity Net Gain (BNG) - river units

5.7 Biodiversity Net Gain (BNG) - river units. The Applicant has committed to delivering 20% Biodiversity Net Gain (BNG) however the BNG Assessment Report [AAP-098] shows that the scheme will only deliver 3.4% BNG river units.

5.8 Appendix C of the BNG report [As-163] provides an Outline River Unit Net Gain Strategy to address the shortfall of BNG units, through the creation of (a) at least 227m of ditches and (b) 0.03 BNG river units delivered on the River Cam (or a river/watercourse in Cambridgeshire).

5.9 Appendix C proposes to deliver the 227m of ditch creation within Work Area 39 – Ecological Mitigation Area, shown on 4.3.3 Works Plans Sheet 3 [AS-150]. However, the Council is concerned that the proposed habitat creation within Work Area 39 is not included within the landscape proposals (Section 8, Design and Access Statement [APP-208]), nor contained within the Landscape, Ecological, Recreational Management Plan [APP-099]. It is therefore not possible to determine whether these BNG units will be achieved on-site.

5.10 The Applicant is unable to deliver enhancement of the river Cam within the red-line boundary and therefore, is proposing to secure 0.03 BNG river units off-site. The applicant has not identified any potential off-site BNG schemes and therefore, the Council is concerned that it may not be possible to rely on off-site BNG credits to achieve the proposed 20% BNG. The Council requires further assurances that the scheme will deliver these off-site credits, including exploration and identification of off-site scheme and securing delivery through planning obligations.

5.11 The Applicant is proposing to secure the biodiversity net gain comprising river units as part of the Operational Outfall Management and Monitoring Plan through requirement 10(4)e of the Draft Development Control Order [AA-139], however, it is unclear what exactly will be provided within this document. In addition, it is unclear why BNG has not been included within Construction Outfall Management and Monitoring Plan required at 10(1).

5.12 The Council is also unclear how any impacts to BNG river units (e.g. ditches) outside of the Outfall works, for example, reinstatement following pipeline installations or loss of watercourse habitat associate with any culvert works.

5.13 The Council considers it more appropriate to deal with all on-site BNG as part of a site-wide landscape scheme / LERMP. With, Requirement 10 dealing specifically with off-site river BNG units.

Neutral

5.14 The Council welcomes the submission of the latest version of the Habitats Regulations Assessment document [AS-070], which fully addresses the concerns set out in the Council's Relevant Reps [RR-001] about the quality of the original HRA assessment [APP-101].

5.15 The Council agrees there will be no likely significant impact on the integrity of a European site.

Negative

Stow-Cum-Quy Fen SSSI

5.16 Stow-cum-Quy Fen SSSI is hydrologically linked to Black Ditch. The Update to Contaminant Transport Model [APP-158] confirms that any contamination of the Black Ditch could *"affect water quality in the sections of Black Ditch located within Stow Cum Quy Fen SSSI. This would include water quality in a pond in the northern corner of the SSSI through which flow in Black Ditch passes"* but concludes that with appropriate design, construction and management, there is unlikely to be an adverse impact on ground-water quality / black ditch / SSSI. However, we have reviewed the Code of Construction Practice parts A [APP-069] and B [APP-068] and cannot find any specific mitigation measures to the black ditch, nor any monitoring programme to ensure the Black Ditch and Stow-cum-Quy Fen SSSI will not become contaminated. Further clarification is required.

5.17 ES Chapter 20 – Water Resources [APP-054] identifies a potential adverse impact on Stow-cum-Quy Fen SSSI from dewatering works during construction and proposes managing this issue through monitoring of Black Ditch and The Cut (Stow-cum-Quy Fen SSSI) prior to and during dewatering. While the Code of Construction Practice Part A [APP-068] mentions the creation of boreholes, there is no specific reference to the borehole sites identified in Chapter 20. The Council seeks that specific reference is given to black ditch and The Cut (Stow-cum-Quy Fen SSSI).

Allicky Farm Ponds County Wildlife Site ('CWS')

5.18 ES Chapter 20 – Water Resources [APP-054] identifies a potential adverse impact on Allicky Farm Pond County Wildlife Site (CWS) from dewatering works during construction and proposes monitoring of Black Ditch (hydrologically linked) and Allicky Farm Pond CSW prior to and during dewatering. While the Code of Construction Practice Part A [APP-068] mentions the creation of boreholes, there is no specific reference to the borehole sites identified in Chapter 20. The Council seeks that specific reference is given to Allicky Farm Pond CWS.

River Cam County Wildlife Site County Wildlife Site ('CWS')

5.19 The proposed development will result in significant (moderate) impacts to the River Cam County Wildlife Site as a result of the proposed Outfall works due to habitat loss / water quality (construction).

5.20 ES Chapter 8 – Biodiversity [AS-026] (para 4.2.17-18) does not assess the significance of effect as a result of the loss of riverbank habitat and therefore the impact on the County Wildlife Site is unclear. It is also unclear why compensation is not proposed to off-set adverse impact to the CWS.

5.21 ES Chapter 8 – Biodiversity [AS-026] (para 4.2.18) considers the *"the impact of work in the riverbed during the outfall construction on water quality in the River Cam CWS is moderate in terms of magnitude. Combined with medium sensitivity for the river, there would be a temporary, reversible, slight adverse effect, which is not significant*" (para 4.2.18).

5.22 The County Council does not agree with this statement – the temporary impact should be considered of moderate significance, in accordance with methodology set out at Table 3-2: Significance of Effect.

5.23 It is noted that Requirement 10 [AS-139] proposes to address the outfall and its associated biodiversity impacts. The Council asks that outline Construction / Operational Outfall Management and Monitoring Plans are submitted to the examination to demonstrate how adverse impact to the CWS and above concerns will be addressed.

Veteran Trees

5.24 Figure 8.3 [AS-050] identifies at least one veteran oak tree will be impacted by construction of the Waterbeach pipeline, with a second veteran oak tree to be potentially impacted by the works. adversely impacted by the construction works. However, ES Chapter 8 – Biodiversity [AS-026] does not provide a specific assessment for this irreplaceable habitat and therefore the level of impact on these veteran trees remains unclear.

5.25 These two veteran trees have been referenced within the Arboricultural Impact Assessment for the Waterbeach Pipeline [APP-104]. One of these trees, T105 has been identified as requiring protective Heras fencing during construction works (paragraph 8.1.3).

5.26 The Council is concerned that the ES Chapter 8 (para 4.250) refers to general measures to safeguard trees and hedgerows set out in the Code of Construction Practice Parts A / B does not specifically refer to veteran trees, nor the tree mitigation measures set out in the Arboricultural Impact Assessment for the Waterbeach Pipeline [APP-104]. which in turn refers to the Tree Protected Plans within the Arboricultural Report [APP-102]. However, the Tree Protection Plan does not identify any trees located within the northern section of the red-line boundary where the veteran trees are located and therefore, there is no current The CoCP Part A should be updated to include provisions to protect these veteran trees and their root protection zones during construction.

Water Vole

5.27 The proposed development will result in the permanent loss of water vole habitat it is proposed that Work Area 39 – Ecological Mitigation Area will provide a suitable receptor site to translocate water voles on to. However, no landscape details for Work Area 39 have been provided for within the Design and Access Statement [AS-168], Habitats and Water Bodies Plans [AS-158] or LERMP [AS-066] and therefore it is not possible to determine whether the proposed mitigation will be adequate.

Reptiles

5.28 Common reptiles (grass snake / common lizard) will be adversely impacted by the proposals. The Code of Construction Practice Part A [APP-068] requires a Reptile Mitigation Strategy to be produced by the contractor prior to works commencing on site. The Council is concerned there is not mechanism for the Relevant Planning Authority to review the Reptile Mitigation Strategy to ensure it is appropriate, particularly local translocations given nearby sites already support high common reptile populations, which could impact the long-term suitability of a receptor site for reptiles and/or result in double handling and undue stress to the animals. There is also no mechanism to manage habitats for the benefit of reptiles at a receptor site (if translocation is required).

5.29 It is therefore considered appropriate to produce the Reptile Mitigation Strategy and all other protected species mitigation, within the LERMP, as well as detailed in a Construction Ecological Management Plan, which should form part of the CEMP – Requirement 9. In addition, management of any proposed off-site reptile translocation site should be secured through planning obligations (if required).

Mitigation

Biodiversity Net Gain (BNG)

5.30 Further details are required in the LERMP to demonstrate how 20% BNG will be secured. This should cover all on-site BNG, including Work Area 39 (detailed in ES Chapter 8 Biodiversity [AS-026], paragraph 4.2.56). An outline Construction Outfall Management and Monitoring Plan should be provided to demonstrate how off-site BNG river units will be dealt with.

5.31 The County Council considers section 106 planning obligation is required to ensure delivery of off-site BNG to secure the deliverability of off site mitigation that is required.

Stow-cum-Quy Fen SSSI / Allicky Farm Ponds County Wildlife Site ('CWS')

5.32 The Code of Construction Practice Parts A [APP-068] / B [AS-161] should be updated to confirm that water monitoring programme will include Black Ditch, Stow-cum-Quy SSSI and Allicky Farm Ponds CWS and what remedial action will be undertaken if an issue is identified.

River Cam County Wildlife Site / off-site river BNG

5.33 An outline Construction Outfall Management and Monitoring Plan should be provided to demonstrate how mitigation / compensation for impact to River Cam will be addressed. The Council seeks greater clarity about how this will be dealt with any off-site compensation through requirement 10 and planning obligations.

Veteran Trees

5.34 Code of Construction Practice Parts A / B andTree Protected Plans within the Arboricultural Report [APP-102] should be updated to avoid / mitigate adverse impacts to veteran trees.

Landscape, Ecological and Recreational Management Plan ('LERMP') [AS-066]

5.35 Currently, the LERMP is only focused on the new WWTP. It should be expanded to be a site-wide Landscape and Ecological Management Plan, covering all aspects of biodiversity mitigation, compensation, and enhancement. It should include a BNG Plan for all on-site BNG habitats (including river BNG units and reinstatement of habitats that were temporarily lost). It should also include protected species mitigation strategies for water vole, reptiles, bats and badger and detailed design for Work Area 39 – Ecological Mitigation Area.

Operational phase impacts

Positive

Biodiversity Net Gain (BNG)

5.36 As set out in the 'construction phase impacts' section above, the Applicant has committed to delivering 20% Biodiversity Net Gain (BNG). These habitats should be managed to achieve their target conditions, and for the lifetime of the development.

5.37 The LERMP [APP-099] states that it *"the LERMP forms the outline Implementation Plan (IP) and Management and Maintenance Plan (MMP) for BNG"*. However, the document provided no information about how habitats will be managed and monitored to ensure delivery of the BNG scores proposed in the BNG Assessment [APP-098]. This should include BNG audits in years 1, 2, 3, 5 and every 5 years.

5.38 The LERMP focusses on the habitats to be created within the new water treatment plant site. It does not consider the reinstatement of habitat (following completion of temporary works / pipeline installation) and how these habitats will be managed until they meet their target BNG condition.

5.39 The LERMP does not include BNG river units, which are to be dealt with in the Operational Outfall Management and Monitoring Plan (OMMP) under requirement 10(4)e of the draft DCO [AS-139]. No outline OMMP has been provided as part of the application and therefore, it's unclear whether this will provide sufficient details to ensure on-site river units will be managed and monitored to deliver the target conditions (including works within work area 39). It is also unclear how any 'river units' (e.g. ditches) within the wider red-line boundary will be managed. In addition, the requirement does not include a specified length of management period and therefore, it is unclear whether the habitats will be managed for at least 30 years. As stated above, the Council consider a site-wide LERMP to be a preferable approach.

Neutral

European Sites

5.40 The Council welcomes the submission of the latest version of the Habitats Regulations Assessment document [AS-070], which fully addresses the concerns set out in the Council's Relevant Reps [RR-001] about the quality of the original HRA assessment [APP-101].

5.41 The Council agrees there will be no likely significant impact on the integrity of a European site.

Negative

Stow-cum-Quy Fen SSSI – Recreational Pressure

5.42 ES Chapter 8 – Biodiversity [APP-090] considered the impact of recreational pressure on Stow-cum-Quy Fen SSSI. The Council welcomes the proposed monitoring of recreational pressure on the SSSI. However, the LERMP [APP-099] is only proposing to undertake visitor surveys on the new treatment plant for years 1-5. It would be more beneficial to complete recreational pressure surveys on the SSSI so that the current / future degradation of the site can be identified, and conduct visitor surveys are undertaken to establish how the new treatment plant has influenced behaviour / level of access. The Councils suggest this monitoring work is included within the LERMP. The monitoring should continue for the lifetime of the scheme, unless it is agreed with Natural England / Local Planning Authorities that sufficient assessment has been completed to determine there will be no impact.

Low Fen Drove Way Grasslands and Hedges County Wildlife Site CWS – Light Spill

5.43 Low Fen Drove Way Grasslands and Hedges CWS supports species-rich grassland and diverse hedgerows of county importance, as well as providing a strategic wildlife corridor that supports a variety of invertebrate, reptiles, bats etc. Unimproved species-rich calcareous grassland was not recorded during the Applicant's survey (para 3.1.22, ES Chapter 8 – Biodiversity [AS-026]. However, the County Council commissioned the Wildlife Trust to assess the condition of this CWS during summer 2023, where it was confirmed that the condition of the CWS is deteriorating due to lack of management, but unimproved calcareous grassland is still present within most westerly section of the disused railway (beyond the red-line boundary for the current scheme).

5.44 ES Chapter 8 – Biodiversity [APP.040] (para 4.3.44) identifies potential adverse impact on Low Fen Drove Way Grassland and Hedgerow CWS as a result of light spill from the proposed WWTP.

5.45 We do not agree with the Applicant's assessment that the impact on the Low Fen Drove Way Grasslands and Hedges CWS from light spill is not significant. This is because the assessment was based on the assumption that the Detailed Lighting Design *will "comply with the Lighting Design Strategy"*… including requirement for lighting to accord *with "Guidance Note 08/18 – Bats and Artificial Lighting".* However, the Lighting Design Strategy [APP-072] does not provide sufficient evidence to demonstrate this will be delivered. The Council seek greater detail provided under Lighting Design Objective 6 (para 4.2.18) to demonstrate how the lighting will minimise impacts on sensitive ecological receptors identified for this scheme, including maintaining a dark corridor along the Low Fen Drove Way Grasslands and Hedges CWS and implementing the latest ILT/BCT Guidance Note 08/23. We would expect the lighting design to retain a dark corridor along the CWS.

5.46 If it is not possible to achieve no increase in illumination of the CWS, then mitigation measures will be required. We suggest this includes enhancement to the County Wildlife Site to improve the quality of the habitats of the CWS to be secured through planning obligations.

Low Fen Drove Way Grasslands and Hedges County Wildlife Site ('CWS') – Recreational Pressure

5.47 ES Chapter 8 – Biodiversity [AS-026] has not considered the potential impact of recreational pressure on the disused railway section of the Low Fen Drove Way

Grasslands and Hedges CWS as a result of potential increased usage by people accessing the new WWTP and the expansion of the bridleway.

5.48 There is a lack of access to greenspace / the countryside across Cambridgeshire and as a result, this puts pressure on nature reserves and wildlife sites through high levels of visitor pressure. Opening up the County Wildlife Site to more visitors has the potential to increase access and damage to its important grasslands.

5.49 The County Council commissioned the Wildlife Trust to undertake a condition assessment of the Low Fen Drove Way Grasslands and Hedges CWS in 2023. It has identified that the remnant section of unimproved calcareous grassland is located within the western section of the disused railway but the condition of the grassland within the remainder of the CWS is declining due to lack of management. It also identified the potential adverse impacts of recreational pressure, if access is increased.

5.50 The Council therefore seeks enhancement to this County Wildlife Site, in the form of securing better management, to off-set any potential adverse impacts from recreational pressure. It is suggested this is secured through planning obligations.

5.51 If the Applicant can demonstrate there will be no impact to the CWS as a precaution, a monitor programme must be implemented as part of the LERMP to identify any adverse impact on this CWS and set out what remediation measures will be required.

River Cam County Wildlife Site ('CWS')

5.52 ES Chapter 20 – Biodiversity [AS-026] (para 4.3.37) confirms there will be a reduction in frequency of stormwater discharges on water quality in the River Cam, which is welcomed. However, the Council is concerned that the impact from scour of discharged treated effluent (during storm events) on the River Cam is identified as moderate adverse and significant impact on the River Cam County Wildlife Site.

5.53 The Applicant considers that the final outfall design will result in a residual *'slight adverse and not significant'* residual impact (paragraph 4.3.27, Chapter 8 [AS-026]. However, the Council considers that in the absence of detailed CFD modelling to demonstrate that the impact can reduced through design, a precautionary approach must be taken and assume the scheme will result in a moderate adverse (significant) effect on the River Cam CWS. No compensation is proposed to address this issue.

5.54 It is understood the effects of scouring will be monitored through the operational phase however, it is unclear how adverse impacts on the County Wildlife Site associated with any remediation works will be compensated, such as loss of bank habitat (as a result of expansion of engineering works).

5.55 The County Council seeks the submission of an outline Construction / Operational Outfall Management and Monitoring Plans to demonstrate how the adverse impact on the CWS will be mitigated / compensated through the provision of enhancements to the River Cam secured as part of Requirement 10 and planning obligations.

Bats

5.56 The Lighting Design Strategy [APP-072] does not provide adequate mitigation to demonstrate that bats will be unaffected by the lighting scheme. The Council seek greater detail provided under Lighting Design Objective 6 (para 4.2.18) to demonstrate how the lighting will minimise impacts on sensitive ecological receptors identified for this scheme, including maintaining a dark corridor along the Low Fen Drove Way Grasslands and Hedges CWS and other bat corridors and implementing the latest ILT/BCT Guidance Note 08/23.

Water Vole

5.57 The scheme will result in the permanent loss of water vole habitat. Work Area 39 has been identified as a compensation site but no further details have been provided. The management of Work Area 39 should form part of the LERMP and be managed for the lifetime of the development.

Mitigation

Low Fen Drove Grasslands and Hedges County Wildlife Site ('CWS') / Bats

5.58 The Lighting Strategy must be updated to better demonstrate how light spill will be minimised and dark corridors protected, including Low Fen Drove Grassland and Hedges CWS.

5.59 In addition, the Council also seeks enhancement to Low Fen Drove Grassland and Hedges CWS to mitigate adverse impact from lighting / recreational impacts, which could be secured through planning obligations.

River Cam / BNG river units

5.60 An outline Construction / Operational Outfall Management and Monitoring Plan should be provided to demonstrate how mitigation / compensation for impact to River Cam will

be managed, as a result of scouring from water discharge. River Cam enhancement is also required to off-set the river BNG units. The Council seek greater clarity how this will be deal with through requirement 10 and planning obligations.

Landscape, Ecological and Recreational Management Plan

5.61 Currently, the Landscape, Ecological and Recreational Management Plan is only focused on the new WWTP. It should be expanded to be a site-wide Landscape and Ecological Management Plan, covering all aspects of biodiversity mitigation, compensation and enhancement. It should include a BNG Plan that includes management for all on-site BNG habitats (including river BNG units and reinstatement of habitats that were temporarily lost). It should also include protected species mitigation strategies for water vole, reptiles, bats and badger. As well as providing a comprehensive monitoring scheme for BNG / habitat creation (years 1, 2, 3, 5 and every 5 years) and protected species.

5.62 The monitoring programme to assess impact of visitor pressure on Stow-cum-Quy Fen SSSI is not adequate should be expanded to assess the recreational impact at the SSSI itself (rather than visitor surveys on the treatment plan) and to be monitored through the lifetime of the operational phase.

Draft Development Consent Order and Work Plans

Requirements and Obligations

5.63 Requirement 9 - Construction environmental management plans part (2)a should also include a Construction Ecological Management Plan to ensure all biodiversity features, including protected species, are adequately protected during construction.

5.64 Requirement 10 – Outfall part 10(1) Construction Outfall Management and Monitoring Plan should include provisions to address the adverse impacts to River Cam County Wildlife Site and associated need for additional river BNG credits that cannot be covered by the scheme. The management of this mitigation for the lifetime of the Proposed Development should be delivered as part of 10(2) Operational Outfall management and Monitoring Plan.

5.65 Requirement 10 should only cover river units that cannot be delivered within the red-line boundary. For example, the proposed ditches identified within Work Area 39 should be secured under Requirement 11 - Requirement 11 – detailed LERMP.

5.66 Commitment to deliver 20% BNG through Requirement 11 - Landscape, Ecological and Recreational Management Plan is welcomed. Requirement 11 should also secure management of the new treatment plan and work area 39 for the lifetime of the operational period.

5.67 Planning Obligations should include securing Biodiversity Net Gain / compensation to River Cam CWS, Low Fen Drove Way Grasslands and Hedges and Reptile Mitigation Strategy (translocation) through Section 106 agreement.

TOPIC 4 Carbon

Policy context

Local Plan Policy

Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) (MWLP)

6.1 **Policy 1** of the MWLP requires that development, including operational practices and restoration proposals, must take account of climate change for the lifetime of the development through measures to minimise greenhouse gas emissions. Development should, to a degree which is proportionate to the scale and nature of the scheme, set out how this will be achieved, such as: demonstrating how the location, design, site operation and transportation related to the development will help to reduce greenhouse gas emissions (including through the adoption of emission reduction measures based on the principles of the energy hierarchy); and take into account any significant impacts on human health and wellbeing and on air quality; and where relevant, setting out how the proposal will make use of renewable energy including opportunities for generating energy from waste for use beyond the boundaries of the site itself, and the use of decentralised and renewable or low carbon energy.

Other Relevant Local Policy/Strategy

6.2 Cambridgeshire County Council have declared in their updated Climate Change and Environment Strategy (published February 2022) an ambition for the county of Cambridgeshire to reach net zero carbon emissions by 2045.

Construction Phase impacts

Neutral

6.3 During the first year, there will be a small reduction in carbon sequestration from land use of 8 tonnes CO_2e, according to the Applicant, (5.2.10 Environmental Statement - Volume 2 - Chapter 10 - Carbon) [APP-042] although this will be repaid in later years if landscape management goes according to plan.

Negative

6.4 The Applicant's assessment of the GHG emissions from construction (Table 4-1) is 50,790 tonnes CO_2e. [APP-042].

6.5 The Council disagrees with the Applicant's chosen baseline. The Council's view is that the baseline for construction ought properly to be zero, since without the development, no construction would take place. Therefore the net change in emissions from the construction phase as a result of the development is an increase of 50,790 tonnes CO_2e. This is a significant adverse effect.

6.6 Construction emissions should also include construction waste disposal, which is not mentioned in the Applicant's Table 2-3 [APP-042]

Mitigation

6.7 Consideration should be given to minimising use of high-carbon materials such as concrete, steel etc, and more use of low carbon construction methods and materials, such as more use of recycled/reclaimed materials, electrical plant/tools and locally sourced items.

6.8 It is noted that the Applicant has already applied various good practice construction measures to reduce the embodied carbon from the construction phase, and that further design optimisation opportunities are being investigated.

6.9 Checks will need to be made, prior to construction, that the final design either matches or improves on the bill of materials used for estimating emissions from construction. The emissions from construction transport can also be updated when supplier locations and transport distances of materials are known.

Operational phase impacts

Positive

6.10 Carbon sequestration from landscaping will have a small beneficial effect, provided that the land is managed appropriately to ensure that trees and vegetation continue to sequester carbon.

Neutral

6.11 Other sources of carbon emissions not considered in the application such as transportation are likely to be similar to those of the existing plant.

Negative

6.12 Gross emissions from operation are estimated by the Applicant at 2,730 tonnes CO_2e in year one (2028) for their preferred option of biomethane production, or 2,130 tonnes CO_2e for the alternative option of Combined Heat and Power (CHP) production. [APP-042].

6.13 This means that gross emissions would be higher for the Applicant's preferred option compared to the alternative option, before avoided emissions are taken into account.

6.14 The highest share of operational emissions in either option is from the use of grid electricity on-site, according to the Applicant (Table 4-4 and Figure 4.2 [APP-042]. However, these emissions could change depending on the electricity grid decarbonisation profile. (This issue is mentioned by the Applicant later in paragraphs 5.1.5 and 5.1.6 [APP-042]). The year one emissions presented by the Applicant will therefore not be representative of every year of operation. In the Applicant's ES volume 4, chapter 10, appendix 10.1 (GHG Calculations) [APP-109], paragraph 2.3.2 and Table 2-8, it looks like the UK average grid electricity emissions factor forecast for 2028 has been used for the calculations. This only shows what emissions will be in one year of operation so is not suitable for assessing overall emissions from the project, especially as the carbon intensity of the UK electricity grid varies from year to year (and is forecast to get lower over time). This issue of gradual decarbonisation of the

electricity grid is addressed later though, in paragraphs 2.7.1, Table 2-15, and Tables 2-17, 2-18 and 2-19.

6.15 Therefore, according to the Applicant's data in Table 4-8 of 5.2.10 Environmental Statement - Volume 2 - Chapter 10 - Carbon) [APP-042]), the total lifetime gross emissions from the proposed development (un[9][OBJ]) would be 104,410 tCO_2e for the preferred option of biomethane export, or 80,070 tCO_2e for the alternative CHP option. This makes the CHP option lower carbon, based on gross emissions, before avoided emissions are taken into account.

6.16 The Applicant states in paragraph 2.4.6 and 4.6.3 of their ES [App-042] that the carbon emissions for operation are presented for 30 years, which the Applicant states is based on the 30 year lifespan of the Landscape, Ecological and Recreational Management Plan. The plant is expected to be retained indefinitely. It would be useful to clarify what will be likely to happen after 30 years.

6.17 It is unknown what the net change in operational emissions would be, compared to the existing plant that this proposed development would be replacing, since the existing plant baseline is not stated.

6.18 The Applicant mentions in paragraph 3.2.8 of the ES Chapter 10 [APP-042], that Anglian Water's overall emissions across its business are 0.432 tCO2e per Ml of recycled water. This is compared in Table 4-5 to gross emissions from the proposed development of 0.043 tCO_2e or 0.034 tCO_2e per Ml of recycled water, depending on the option chosen. However, the emissions from the existing Cambridge plant in particular are not stated. Moreover the 0.432 figure is based on 2020 data, so is not a like for like comparison to the 2028 data presented for the proposed development, especially as the largest share of operational emissions is from electricity use, the carbon intensity of which is generally decreasing over time.

Mitigation

6.19 Biogas export to grid is the Applicant's preferred option, but it is uncertain what the scale of avoided emissions from biogas could be. The Applicant has estimated these avoided emissions at -3,490 tonnes CO_2e for year one (2028), which would be more than enough to offset the gross emissions from operation. However this figure should be regarded as uncertain, and getting increasingly more uncertain for future years. This is because it is uncertain to what extent the export will be displacing other sources of gas (fossil fuels), rather than contributing to an overall increase in gas use. Conversely, it is also uncertain whether the export to the gas grid will be required for the entire lifetime of the plant, considering the trend to electrification of heating. The Applicant references the uncertainty of this in their footnote 4 to Table 4-4 on page 36

[9] The Applicant's Table 4-8 heading states up to 2080 but the paragraphs above and the data suggest that this should read as up to 2057.

[APP-042], that there are no government projections for gas grid decarbonisation. This means that the avoided emissions from biomethane production should be regarded as very uncertain.

6.20 The alternative option presented by the Applicant is CHP. The Applicant estimates the avoided emissions from CHP at -1,030 tonnes CO_2e in year one (2028), which would offset around half of the estimated gross emissions from operation for this option.

6.21 The total lifetime net emissions, according to the Applicant's data, would be 71,480 tCO2e for the CHP option, or -32,330 tCO2e for the Applicant's preferred biogas option. These numbers are estimates and sensitivity analysis should be considered.

6.22 Taking into account avoided emissions, the Applicant's preferred option would be likely to be the lower net emissions of the two options, although there are uncertainties as outlined above.

6.23 Actual (gross) emissions should be given more weight in the decision making process than avoided emissions, due to their higher level of certainty.

6.24 Operational emissions could be reduced further by increasing the share of electricity that is generated from renewable sources, especially on-site renewables such as solar PV.

6.25 Landscape management will be essential to ensure that trees continue to grow and sequester carbon. This should be part of the LERMP.

Draft Development Consent Order and Work Plans

Requirements and Obligations

6.26 The detailed LERMP, to be provided as part of Requirement 11 of the DCO [AS-139] should include the maintenance of trees and monitoring should ensure delivery for carbon sequestration.

6.27 Requirement 7 of the DCO [AS-139], Detailed Design includes the Applicant providing the materials and finishes to be used to construct any buildings. This needs to demonstrate the final design either matches or improves on the bill of materials used for estimating emissions from construction. The emissions from construction transport can also be updated when supplier locations and transport distances of materials are known.

TOPIC 5 Health

Policy context

Local Plan Policy
Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) (MWLP):

7.1 **Policy 18** of the MWLP requires that: proposals must ensure that the development can be integrated effectively with existing or planned (i.e. Development Plan allocations or consented schemes) neighbouring development; and development must not result in unacceptable adverse impacts on the amenity of existing occupiers of any land or property, including risk of harm to human health or safety. It also requires that: proposals must ensure that the development can be integrated effectively with existing or planned (i.e. Development Plan allocations or consented schemes) neighbouring development; and development must not result in unacceptable adverse impacts on the amenity of existing occupiers of any land or property, including air quality from odour, fumes, dust, smoke or other sources.

Other Relevant Local Strategies

7.2 South Cambridgeshire Supplementary Planning Document for Health Impact Assessment (South Cambridgeshire District Council, 2011)

7.3 The Cambridgeshire & Peterborough Health & Wellbeing Integrated Care Strategy which is not referred to in the Health Chapter and is an important and relevant strategy for Cambridgeshire.

Construction Phase impacts

Positive

7.4 The Council is generally satisfied that the noise and vibration assessment is robust and has used appropriate methodology, however there are concerns that the noise for the emergency generators has been scoped out.

Negative

7.5 Consideration of the “ventilation stack” which is to be installed on the existing site at the interception shaft. These impacts have not been assessed within the EIA, therefore they remain as negative until they have been assessed and suitable mitigation proposed. The impacts should be assessed for future residential receptors. It is unclear if the stack will be removed if/or when the site is redeveloped and therefore how long it will be in situ.

7.6 The Council would seek further clarity regarding the decommissioning process and responsibility for decontamination of the site prior to redevelopment. The Health Chapter references the Decommissioning Plan [AAP-070], but some of the potential Health Impacts are either not clear or have not been addressed. Clarity is needed on the decommissioning timelines, i.e., how long is the decommissioning process, at what

point does it start, and how long are the gaps between each stage. There are concerns that once the site is decommissioned there may be a considerable gap until the site is redeveloped. Disused sites such as this may become targets for theft, vandalism and general antisocial behaviour, this can lead to increased community perceptions of lack of safety.

7.7 In Table 2-8 in the Environmental Statement Chapter 12 [APP-044], it states changes to road layout or volumes of traffic are unlikely to significantly affect access to education, and therefore scoped out of any further assessment. However, earlier in the Health Chapter it states "changes in access to local services (Fen Ditton School) - during construction" will be an effect. More information is needed to ensure a good access is maintained throughout the construction phase.

7.8 The health impacts on construction workers, particularly access to healthy food, should be included as part of the Environmental Statement Chapter 12. It is likely that construction workers will source food from takeaway provision, probably from “burger vans” which long term is an unhealthy source of food.

Mitigation

7.9 As some of the impacts have not been assessed, the appropriate mitigation measures have not been given.

7.10 Please see Landscape and Visual Impact Chapter of this document for impacts associated with users of public rights of way. This includes maintaining access to the area. Access to green spaces is important for wellbeing.

Operational Phase Impacts

Positive

7.11 There are no positive impacts identified for the operational phase in respect of Health.

Neutral

7.12 Again as mentioned in the Construction phase, the noise and vibration assessment is robust for the Operational phase, nevertheless there remain concerns related to the noise of emergency generators which have been scoped out. Further assessments will be needed to assure there are no impacts on human health from noise and vibration when the fixed plant locations have been confirmed. Both need to be part of the Construction Environment Management Plan for the main site. (Requirement 9 b) (ix)).

Negative

7.13 The Proposed Development will have a significant adverse impact on the landscape both visually (from both the new structures and lighting proposed), but also as a result of the traffic generated by the development during operation along its new access road. The Byway Open to all traffic (No. 130/17 Horningsea) runs immediately to the north and east of the Proposed Development. It is relatively lightly used, but is appreciated for its wide open views of the surrounding countryside, particularly towards

the fens to the east and south-east. Access to green open space is important to wellbeing.

Mitigation

7.14 Further assessment of the emergency generators noise and vibration impacts are needed to be certain there is no adverse impact. There is also the need to assure there are no impacts on human health from noise and vibration when the fixed plant locations have been confirmed. Both need to be part of the Construction Environment Management Plan for the main site. (Requirement 9 b) (ix)).

7.15 The Council welcomes the proposed new Public Bridleway linking Low Fen Drove with Station Road, Stow-cum-Quy, and recognises that this may provide some reasonable degree of compensation for users of the public rights of way (PROW) network and local communities. However, details to ensure the delivery of a dedicated PROW is needed to give certainly it is a permanent measure and thereby can be considered as a mitigation measure.

7.16 The Council would prefer that this path was a Restricted Byway, as this would enable use by carriage drivers who have few facilities available in the area, and it would also confer equal rights for cyclists as for other non-motorised users (NMUs). It will also help meet certain policy requirements of the Cambridgeshire Rights of Way Improvement Plan (ROWIP), National Planning Policy Framework (NPPF) paragraph 100, the Defra 25 Year Environment Plan, and the Cambridgeshire & Peterborough Joint Health and Wellbeing Integrated Care Strategy.

7.17 The Council consider that more could be done to offset the adverse impact on local communities, including provision for all NMUs being inclusive of equestrians along the B1047 over the A14 bridge into Fen Ditton, meeting the new Bridleways being delivered as part of the Marleigh housing development; Section 106 (s106) legal agreement monies for protection and enhancement of the existing PROW network in the vicinity of the proposed development; heritage interpretation boards; and a Community Fund to help support local community initiatives. The Council would welcome early engagement with the Applicant to resolve these concerns by the close of the Examination.

Decommissioning Phase Impacts

Neutral

7.18 Sections 6.2-6.5, 6.7-9, and 6.11-6.13 of the Decommissioning Plan [AS-051] refers to the process of emptying the “tanks” on site and “punching holes in them to prevent water build up. The Environmental Statement, Chapter 12, Health, has not assessed if there are any human health impacts of leaving these tanks in place with the potential for leachate from said holes.

7.19 Section 6.15.3 of the Decommissioning Plan [AS-051] mentions the need for temporary odour control/scrubbers, the use of such controls has not been assessed within the Environmental Statement, Chapter 12, Health. In addition, the health impacts of the

cleaning process e.g. through fugitive emissions and/or noise have not been assessed with the Health Chapter. In addition are there any human health impact during cleaning from (spray, odour etc.).

Mitigation

7.20 The Applicant needs to assess the health impacts related to measures included in the Decommissioning Plan related to;

i. empty tanks with holes for drainage
ii. temporary odour control/scrubbers and cleaning processes.

TOPIC 6 Historic Environment

Policy context

Local Plan Policy

Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) (MWLP) and Cambridge Local Plan (2018) and South Cambridgeshire Local Plan (2018):

8.1 Policy 21 of the MWLP states that development will be subject to the requirements set out in the NPPF, including striking an appropriate balance between harm and public benefit, but, as a first principle, development should avoid harm on the historic environment. It then goes on to specify the content of any Heritage Statements that are to be submitted in support an application.

8.2 Policy 61 of the Cambridge Local Plan (2018) is also relevant, and states that proposals should include assessment of the potential impact of the development on any heritage assets, and provide (by way of detailed analysis) clear justification for works that would result in harm to a heritage asset. South Cambridgeshire Local Plan (2018) Policy NH/14 supports development proposals that enhance and sustain the significance of heritage assets, including archaeological remains of all periods.

Construction Phase impacts

Positive

8.3 There are no positive impacts identified for the construction phase in respect of Health.

Neutral

8.4 There are no Neutral impacts identified for the construction phase in respect of Health.

Negative

8.5 The entire area of land required for the WWTP will be excavated during construction to at or below the archaeological horizon resulting in likely destruction of all archaeological remains. Complete removal of archaeological remains is also likely to occur within the corridor for the effluent pipeline. An outfall structure for effluent discharge to the River Cam and area of riverbed removal will similarly remove any below ground heritage assets present. The Waterbeach pipeline will remove any archaeological remains within its footprint, while the proposed associated laydown areas may remove or truncate any archaeological remains present. The proposed tunnel will impact on archaeological remains at its entrance and exit, and at any point

where it might be <2m deep (this is not the case for the majority of its 2.4km length). Construction of any temporary compounds or lay-down areas may truncate or remove any archaeological remains present.

8.6 The Applicant has used a methodology that is likely to result in destruction of all archaeological remains within the development footprint. As the remains identified by the archaeological evaluation are of local to regional (but not national) significance this is acceptable subject to appropriate mitigation measures as detailed below.

Mitigations

8.7 Mitigation of the above impact can be secured through the excavation, recording, publication and deposition of the resulting archive in a publicly accessible repository. Areas where archaeological excavation will be required can be identified from the results of the evaluation. The nature of the archaeology is dispersed, generally unenclosed, prehistoric settlement activity and therefore the extent of any proposed mitigation areas are uncertain and necessarily imprecise. Flexibility should therefore be built into the mitigation strategy to allow for variations to the scope of works during the mitigation phase.

Operational phase impacts

Positive

8.8 There are no positive impacts identified for the operational phase in respect of Historic Environment.

Neutral

8.9 There are no neutral impacts identified for the operational phase in respect of Historic Environment.

Negative

8.10 All heritage assets of archaeological interest are likely to have been destroyed during the construction phase.

Mitigation

8.11 Requirement 13 in the DCO [AS-139] secures the applicant providing an Archaeological Investigation Mitigation Strategy. This is to be approved by the relevant planning authority. Flexibility should be built into the strategy to allow for variations to the scope of works during the mitigation phase.

TOPIC 7 Land Quality and Contamination

Policy context

Local Plan Policy

Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) (MWLP):

9.1 Mineral Safeguarding Areas (MSAs) are identified on the Policies Map for mineral resources of local and/or national importance. Policy 5 (Mineral Safeguarding Areas) of the Plan Except for certain developments (not applicable in this instance), development within MSAs which is not covered by the above exceptions will only be permitted where it has been demonstrated that: (i) the mineral can be extracted where practicable prior to development taking place; (j) the mineral concerned is demonstrated to not be of current or future value; (k) the development will not prejudice future extraction of the mineral; or (l) there is an overriding need for the development (where prior extraction is not feasible).

9.2 Within (l), 'overriding need' is to be judged in the planning balance, including in terms of any national considerations, and the impact upon the local economy. The judgement should also consider the cost of, and scope for, developing outside the MSA, or meeting the need for it in some other way. By 'not feasible' in (l), this could include viability reasons.

Construction Phase impacts

Positive

9.3 There are no positive impacts identified for the construction phase in respect of Land Quality and Contamination.

Neutral

9.4 There are no Neutral impacts identified for the construction phase in respect of Land Quality and Contamination.

Negative

9.5 Sterilisation of Safeguarded Mineral Resources - The development is partially located on areas identified as a Chalk Mineral Safeguarding Area and a Sand and Gravel Mineral Safeguarding Area as depicted on the Cambridgeshire and Peterborough Minerals and Waste Local Plan Policies Map. This indicates that in those areas there may be a chalk or sand and gravel mineral reserve in those areas. The Sand and

Gravel Mineral Safeguarding Area is largely affected by the proposed pipeline from the development to Waterbeach, and the Chalk Mineral Safeguarding Area by the main facility itself. Development will sterilise these resources. The Applicant has provided an estimate of the area of resources that will be sterilised in 5.4.14.5 ES Volume 4 Chapter 14 Appendix 14.5 Mineral Safeguarding Area calculation [APP-126].

Mitigation

9.6 Sterilisation of Safeguarded Mineral Resources – It is noted the applicant is proposing to make use of excavated material within the project itself, which is supported. Whilst it would be ideal to enable the sale of any extracted sand and gravel onto the open market, this is unlikely to be a realist prospect. It is proposed that the material extracted is reused on site, and if it were to be managed off site and sold, there would be a shortfall of material for the development, and this would be a less sustainable outcome.

Operational phase impacts

Positive

9.7 There are no positive impacts identified for the operational phase in respect of Land Quality and Contamination.

Neutral

9.8 There are no Neutral impacts identified for the operational phase in respect of Land Quality and Contamination.

Negative

9.9 The impact of sterilisation of Safeguarded Mineral Resources for the pipeline and main facility identified above remain a permanent impact during the operation of the treatment plant.

TOPIC 8 Landscape and Visual Amenity

Policy context

Local Plan Policy

Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021):

10.1 Policy 17 of the MWLP requires, among other things, that developments: should be of a high-quality design and sympathetic to, and where opportunities arise, enhance local distinctiveness and character of the local area; makes efficient use of land in a way that is durable, flexible and adaptable over its planned lifespan, whilst also creating a richness though the layout, scale, form, materials and landscaping, (including boundary treatment); retain or enhance important features and assets (including trees and hedgerows) within the landscape, treescape or townscape and conserve or create key views; and provide a high standard of amenity for users and maintain or enhance the existing amenity of neighbours. [Cambridge City and South Cambridgeshire District Council Local Plans, policies applicable that we refer to.]

Other Relevant Local Policy/Strategy

Cambridgeshire County Council Rights of Way Improvement Plan (2016 Update)

10.2 The Rights of Way Improvement Plan (ROWIP) is a statutory document under the Countryside & Rights of Way Act 2000, which forms part of the CPCA's Local Transport Plan 3 (LTP3). The Plan is a strategy document that contains the vision of improved countryside access in Cambridgeshire and builds on the rights of way network to bring benefits to transport, tourism, the rural economy, social integration, health and the environment. The ROWIP is not referenced in the Applicant's assessment of the landscape and visual impact of the development [APP-047].

10.3 The ROWIP recognises that demand for access to the countryside is growing and is becoming increasingly significant due to its importance to the rural economy, public health and well-being and place-making, as well as the critical contribution that public rights of way make to the active travel agenda. Delivery of the Plan requires a range of functions and organisations to work in partnership to achieve the strategic plans of the ROWIP in co-ordination with the emerging Active Travel Strategy and the LTP3.

10.4 PROW users are key receptors to viewing the Landscape and it's character. PROW are also integral parts of the landscape and can enhance the character of an area. PROW are an integral part of the landscape.

10.5 The ROWIP's 'Statements of Action' (SOAs) are intended to protect and bring about enhancements to the rights of way network and countryside access. The following key SOAs are relevant to this Application:

- SOA2: a safer and health-enhancing activity: countryside access provision should be safe for users and encourage healthy activities.
- SOA3: 72,500 new homes: new development should not damage countryside provision. Where appropriate, development should contribute to the provision of new links and/or improvement to the existing PROW network.
- SOA5: filling the gaps: countryside provision should build on the platform of the historical network to meet the needs of today's users, particularly equestrians, and land managers.
- SOA8: a better countryside environment: the countryside access experience in Cambridgeshire should be straightforward, enjoyable and inspiring.

10.6 The ROWIP works in partnership with the existing Cambridgeshire & Peterborough Health & Wellbeing and Integrated Care Strategy.

Green Belt

10.7 It is noted that the site for the proposed relocated WWTP is within the Greenbelt. There are no policies in the MWLP relating to the Greenbelt and how to assess applications for development within it. Therefore, in the consideration of this application, the Inspector may wish to consider what weight to give to the policies in the Greenbelt contained within the NPPF, whether the development would be inappropriate development taking guidance from the Cambridge City and SCDC Local Plans, and whether very special circumstances apply and how this balances with the NPSWW.

Construction Phase impacts

Positive

10.8 There are no positive impacts identified for the construction phase in respect of Landscape and Visual Amenity.

Neutral

10.9 There are no Neutral impacts identified for the construction phase in respect of Landscape and Visual Amenity.

Negative

10.10 A number of PROW are impacted by the construction of the proposed development, and as shown on the Rights of Way Plans ('ROW Plans') [APP-020], a series of localised PROW diversions are required while temporary closures are in place. Although the Construction Traffic Management Plan ('CTMP') [APP-148] makes limited reference to how these temporary closures and diversions will be managed, more detail is given in the Code of Construction Practice: Part A ('CoCP A') [APP-068].

10.11 CCC is concerned that the proposal at paragraph 7.6.14 of the CoCP A, to use safety gates across PROW that are undergoing works, may represent an off-putting visual barrier to PROW users.

10.12 CCC notes that the proposed temporary diversion to Footpath 85/6, shown on Sheet 2 of the ROW Plans, appears to be approximately 500m in length. The indicated diversion moves users away from the river bank and includes a ~150m stretch running closely parallel to the A14 dual carriageway. These factors clearly have the potential to impact the public's enjoyment of the affected PROW.

10.13 Paragraph 7.6.15 of the CoCP A makes reference to the potential temporary stopping up of PROW where it is not possible to implement a temporary diversion. CCC is concerned about the impact this could have on users of the local PROW network and their enjoyment of the surrounding environment. Temporary closures should only be deployed as a last resort and must be agreed with the LHA.

10.14 Paragraph 7.6.18 of the CoCP A references the restoration of affected PROW to their pre-commencement condition, or to a standard acceptable to the local highway authority. CCC can see no explanation of how the restoration of particular pre-development conditions would be ensured by the Applicant.

10.15 Non-Motorised Users ('NMUs') are sensitive visual and noise receptors in the landscape and any development should seek to minimise the negative effects of construction on them. The Applicant's Landscape and Visual Amenity assessment [APP-047] identifies a number of locations within 2km the Order limits where the proposed construction works will have slight adverse impacts on the landscape character and visual environment experienced by NMUs (including those using PROW,

roadside facilities, or quiet local roads). A selection of sites are considered to be moderately or largely adversely impacted by the proposed construction.

Mitigation

10.16 The DCO [AS-139] includes requirement 9 the approval of the CEMP and the CTMP by 'the relevant planning authority'. Cambridgeshire County Council as the Local Highway Authority (LHA) should approve the CEMP and CTMP to ensure direct input to changes to the highway network. Currently the DCO defines the Relevant Planning Authority as the district planning authorities. Cambridgeshire County Council is of the view as the Minerals and Waste planning authority, it is the authority to approve requirements. If the DCO is altered to reflect Cambridgeshire County Council as the relevant planning authority, this would also include the LHA.

10.17 This is to ensure the LHA has a direct role in approval input to changes that are undertaken on its highway network and is reliant upon consultation from the relevant Local Planning Authority. However, as these documents do have direct impact on the highway network, CCC feels that the LHA should have a direct role in their approval.

10.18 Notwithstanding the above, all works that would have the effect of altering the highway network, including PROW, should be subject to an appropriate Highways Act 1980 agreement with the LHA.

10.19 The CTMP or CoCP A should include a requirement for pre- and post-construction surveys to be undertaken on the affected PROW, to a methodology agreed with the LHA, so that restoration works can be carried out to an established standard. Restoration of PROW must ensure that the full legal width is restored. Provisions should be made to ensure the right of the LHA to inspect works to PROW.

10.20 A programme detailing the proposed timing and duration of temporary PROW closures and diversions should be agreed with the LHA prior to the commencement of any work on the PROW network. This requirement is in accordance with CCC's standard provisions for the undertaking of street works within PROW. The requirement to do this should be included in either the CTMP or CoCP A, and, as noted above, the approval of these documents by the LHA should be a requirement of the DCO. Any programme that is supplied should incorporate details of a signage strategy to inform PROW users about the changes that may be taking place on the affected parts of the

network, including in relation to PROW that may be subject to the use of safety gates whilst works are ongoing.

10.21 Parish councils and local and statutory user groups (as well as the LHA) should be included as part of the communication to local residents and businesses mentioned in paragraph 7.6.17 of the CoCP A.

10.22 The proposed temporary diversion to Footpath 85/6 should be considered in discussion with the LHA, to explore whether an alternative, less circuitous diversion route could be provided.

10.23 A CEMP should be developed by the Applicant to address issues relating to the impact of construction on the PROW and NMU network.

Operational phase impacts

Positive

10.24 The Applicant proposes to create a new bridleway between Low Fen Drove Way and Station Road, Stow-cum-Quy. This will enhance the connectivity of the bridleway network in the locality and provide additional active travel options for the affected local communities. CCC welcomes this proposal and requests engagement regarding the proposed width, surfacing and other treatments to be applied to the route.

Neutral

10.25 There are no neutral impacts identified for the operational phase in respect of Landscape and Visual Amenity.

Negative

10.26 Non-Motorised Users ('NMUs') are sensitive visual and noise receptors in the landscape. The Applicant's Landscape and Visual Amenity assessment [APP-047] identifies a number of locations within 2km the Order limits where the operational development will have slight adverse impacts on the landscape character and visual environment experienced by NMUs (including those using PROW, roadside facilities, or quiet local roads). A selection of sites are considered to be moderately or largely adversely impacted by the operation of the proposed development, some of which impacts will remain at a moderate level even after 15 years of operation.

10.27 In particular, large adverse impacts are noted at Low Fen Drove Way and Byway 85/14, and at Horningsea Road and the B1047 bridge over the A14. These adverse

impacts will reduce to a moderate level after 15 years of operation. Elsewhere, there are locations which will be moderately adversely impacted in the first year of operation, reducing to a slight adverse impact after 15 years, and other sites which will be slightly adversely impacted throughout the operation.

10.28 The most frequently mentioned adverse impacts in the Landscape and Visual Amenity assessment [APP-047] are the installation of large structures as part of the Waste Water Treatment Plant (WWTP), and the associated screening vegetation, which will change the landscape character and visual environment. (Notwithstanding these, there are deemed to be moderate year one adverse impacts on users of Footpath 162/1 where it is proximate to the proposed effluent outfall into the River Cam, decreasing to a slight adverse impact after 15 years).

10.29 The Applicant notes that in many of the locations considered as part of the Landscape and Visual Amenity assessment, the landscape will become less open and more wooded. After 15 years of operation, the screening planting will not completely shield receptors from the larger structures within the WWTP. Even where these impacts are only assessed to be slightly adverse, it is clear that the changes (both the structures and the vegetation) will be long-lasting and will alter receptors' impression of the landscape. In the most impacted locations, this change could potentially diminish users' enjoyment of the affected PROW and NMU facilities and may discourage participation in active travel.

10.30 It is noted that the Mental Wellbeing Impact Assessment [APP-113] available via the examination document library does not appear to have been completed by the Applicant, so it is difficult to note the potential psychological impact of the development on NMUs. With this potential impact unassessed, it is considered that caution should be applied to any proposals that would affect users of the PROW network.

10.31 With the anticipated growth to Cambridge's north-eastern fringes over the coming decades, there will be increased demand for active travel and leisure routes that are enjoyable and easily accessible. The adverse impacts demonstrated by the Applicant's own assessment leave CCC concerned that the proposed development does not fully satisfy the SOAs outlined in the Cambridgeshire ROWIP, as highlighted in paragraphs 1.13 to 1.17.

Mitigation

10.32 No matter what screening measures are taken to shield users from the development when in operation, it remains the case that the proposals as a whole will, if delivered, represent a permanent change to the landscape in the area of the WWTP. The perception of these changes by local communities and users may be as significant as the actual observable physical effects of the development, and should not be discounted. The identified impacts cannot be completely offset by the measures currently proposed in the application, and therefore CCC seeks further mitigations to be agreed to ensure the PROW and NMU networks in the area can be enhanced in compensation for the enduring alterations caused by the development. Agreement on the form of these mitigation measures would need to be in place prior to the closure of the examination period.

10.33 CCC is clear that the NMU improvements delivered on Horningsea Road and across the A14 should be inclusive of equestrian access, and appropriate infrastructure (equestrian-appropriate crossings, bridge parapets, and carriageway separations, amongst other requirements) should be designed to facilitate this as part of the DCO. The Applicant's designer should engage with the Greater Cambridgeshire Partnership's 'Greenways' project team in respect of delivery of this facility.

10.34 Permissive public access is not considered to be a sufficient mitigation, and accordingly the proposed new bridleway between Low Fen Drove Way and Station Road, Stow-cum-Quy should be created as a dedicated new PROW, as noted in paragraph 9.1 of CCC's Relevant Representations [RR-001].

10.35 If it is not possible to make provision for these further additional mitigation measures within the DCO, the CCC will in the alternative expect section 106 contributions to facilitate PROW and NMU improvements to be delivered in the parishes that are within the 2km area surrounding the development boundary, as identified in the Applicant's Landscape and Visual Amenity assessment [APP-047]. This would either take the form of improvements to the pre-existing PROW and NMU network, or the delivery of new PROW or active travel routes to support CCC's strategic visions and the Statements of Action in the ROWIP.

TOPIC 9 Material Resources and Waste

Policy context

Local Plan Policy

Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021):

11.1 Policy 24 of the MWLP requires that development incorporates proposals for the sustainable use of soils (whether that be off-site or as part of an agreed restoration scheme).

11.2 Policy 26 requires that development should only be permitted where it can be demonstrated that: the proposal does not prejudice the restoration of mineral extraction sites; there is a proven need for the material to be imported; any mineral or waste imported will be used in a sustainable manner; and the minimum amount of material is imported, consistent with the purpose of the development.

Construction Phase impacts

Positive

11.3 There are no positive impacts identified for the construction phase in respect of Material Resources and Waste.

Neutral

11.4 There are no neutral impacts identified for the construction phase in respect of Material Resources and Waste.

Negative

11.5 The project will need to consider requirements for resources and waste management. The proposed development will require resources such as aggregates, and plan for available waste management (for example construction waste) to facilitate its construction and operation.

Mitigation

11.6 Requirement 9 a) xi and b) xi details the need for a Waste Management Plan. This should include the additional mitigation measures.

Operational phase impacts

Positive

11.7 Facility will produce Enhanced Treated Biosolids, which can be used in agriculture.

Neutral

11.8 There are no neutral impacts identified for the operational phase in respect of Material Resources and Waste.

Negative

11.9 There are no positive impacts identified for the Operational phase in respect of Material Resources and Waste.

TOPIC 10 Odour

Policy context

Local Plan Policy

Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021):

12.1 Policy 18 of the MWLP requires that: proposals must ensure that the development can be integrated effectively with existing or planned (i.e. Development Plan allocations or consented schemes) neighbouring development; and development must not result in unacceptable adverse impacts on the amenity of existing occupiers of any land or property, including noise and/or vibration levels resulting in disturbance.

Construction Phase and Operational Phase Impacts

12.2 The County Council does not have specialisms in environmental health to comment on odour and therefore defers to appropriate public bodies. Note South Cambridgeshire District Council LIR and Cambridge City Council LIR contain assessments of the odour impact. Please refer to these.

Mitigation

Requirements and Obligations

12.3 The County Council notes South Cambridgeshire District Council's LIR and additional information and clarifications requested regarding potential odour impacts from the proposed permanent 10m high waste water transfer tunnel vent stack (WWTTVS) at the current site on the future emerging NECAAP receptors. (See our comments regarding health on this matter on page 39.)

TOPIC 11 Transport and Traffic

Policy Context

Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) (MWLP):

13.1 Policy 18 of the MWLP requires that: proposals must ensure that the development can be integrated effectively with existing or planned (i.e. Development Plan allocations or consented schemes) neighbouring development; and development must not result in unacceptable adverse impacts on the amenity of existing occupiers of any land or property, including noise and/or vibration levels resulting in disturbance.

13.2 MWLP Policy 23: Traffic, Highways and Rights of Way is relevant as the proposed development relates to waste management. Policy 23 states that Mineral and Waste management development will only be permitted if:

- appropriate opportunities to promote sustainable transport modes can be, or have been, taken up, to the degree reasonably available given the type of development and its location. If, at the point of application, commercially available electric Heavy Commercial Vehicles (HCVs) are reasonably available, then development which would increase HCV movements should provide appropriate electric vehicle charging infrastructure for HCVs;
- safe and suitable access to the site can be achieved for all users of the subsequent development;
- any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree;
- any associated increase in traffic or highway improvements would not cause unacceptable harm to the environment, road safety or residential amenity, and would not cause severe residual cumulative impacts on the road network; and
- binding agreements covering lorry routing arrangements and/or HCV signage for mineral and waste traffic are agreed, if any such agreements are necessary and reasonable to make a development acceptable.

Other Policies and Guidance

13.3 There are several national and local policies that are relevant to the DCO proposal that the Applicant must consider and address, these include, but are not limited to:

The Local Transport Plan:

13.4 The responsibility to produce the Local Transport Plan (LTP) has passed from Cambridgeshire County Council to the Cambridgeshire and Peterborough Combined Authority (CPCA). The CPCA is currently updating the adopted LTP (2020), and this strategy is aligned with the emerging Cambridgeshire and Peterborough Local Transport and Connectivity Plan (LTCP).

The County Council transport strategy documents sit under the CPCA's LTCP.

13.5 The County Council, as the Local Highway Authority (LHA), continues to produce transport strategy documents, which are aligned with the emerging vision and objectives of the CPCA LTCP to refresh and reflect the County Council's investment priorities and future aspirations. This strategy work also supports and complements district Local Plans and will review and propose transport improvement schemes for investment for each area.

Other Relevant National Strategy

Gear change: A bold vision for cycling and walking 2012[10]

13.6 This is central government's vision for a transformation of the transport system. This policy document sets out the ambition that:

"England will be a great walking and cycling nation. Places will be truly walkable. A travel revolution in our streets, towns, and communities will have made cycling a mass form of transit. Cycling and walking will be the natural first choice for many journeys…

- *Healthier, happier, and greener communities,*
- *Safer streets,*
- *Convenient and accessible travel,*
- *At the heart of transport decision making."*

Transport Decarbonisation Plan13 – Decarbonising transport: a better, greener Britain[11]

[10] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf

[11] https://www.gov.uk/government/publications/transport-decarbonisation-plan

13.7 This is a government plan which sets out the government's commitments and the actions needed to decarbonise the entire transport system in the UK. It includes:

- a pathway to net zero transport in the UK
- the wider benefits net zero transport can deliver
- the principles that underpin our approach to delivering net zero transport
- Inclusive Mobility.

13.8 Inclusive Mobility[12] - A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure. This central government plan describes features that need to be considered in the provision of an inclusive environment and issues related to disabling barriers, the use of technology, maintenance, awareness of the needs of disabled people, and engagement.

Other Relevant Local Strategy

13.9 CCC's 'Highways Asset Management Policy' and 'Highways Asset Management Strategy' outline "how the County Council will best manage the Highway Network taking into consideration customer needs, local priorities, asset condition and best use of available resources". These documents can be seen here: www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/highway-policies-and-capital-maintenance-programme

13.10 CCC's 'general principles for development' in relation to the highway network are outlined at www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/roads-and-pathways/highways-development

13.11 Cambridgeshire's Draft Active Travel Strategy[13] is a topic-specific transport strategy produced by the County Council that will sit under the Cambridgeshire and Peterborough LTCP. The strategy sets out an ambitious vision that seeks to embrace active travel at the heart of all future transport projects and developments, that will prioritise walking and cycling and other active travel modes to create a well-connected,

[12] https://www.gov.uk/government/publications/inclusive-mobility-making-transport-accessible-for-passengers-and-pedestrians
[13] https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/cambridgeshires-active-travel-strategy

safe, and inclusive active travel network across Cambridgeshire to ensure it becomes the 'go-to' travel option for many local journeys.

13.12 Draft Local Cycling and Walking Infrastructure Plan[14] (LCWIP) forms part of the Government's aim to make walking and cycling the natural choice for all short journeys or as part of a longer journey. DfT recommended that all local authorities should develop LCWIPs and have advised that those authorities with plans will be well placed to bid for future funding. The Cambridgeshire LCWIP covers the whole County and focuses on each district to highlight priority routes for cycling using census data to identify where funding could have the greatest effect in terms of where people live and work. For walking it focuses on Cambridge City and the Market Towns to identify the main routes to school, local shops, employment, and train/bus stations. The routes that are identified in the LCWIP are detailed in Cambridgeshire's draft Active Travel Strategy[15] action plan as Tier 1 of the proposed active travel network vision.

13.13 The CPCA's sustainable growth ambition[16] frames how they seek to achieve sustainable good growth using their 'Six Keys' to improve lives and double the economy of the region, through all their plans. The Six Keys are:

- Climate and Nature
- Health and Skills
- Innovation
- Reducing Inequalities
- Infrastructure
- Finance and Systems

13.14 Vision Zero Partnership[17]: Towards 2030 – Making our road safer for all (2020). The Partnership is working towards a long-term strategic goal of Vision Zero, where there are no deaths and serious injuries on the Partnership's roads. This is an ambitious goal and will need time and effort to be achievable. With this Strategy starting in 2020, the

[14] https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/cambridgeshires-local-cycling-and-walking-infrastructure-plan-lcwip
[15] https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/cambridgeshires-active-travel-strategy
[16] https://cambridgeshirepeterborough-ca.gov.uk/wp-content/uploads/documents/key-documents/Growth-Ambition-Statement.pdf
[17] https://www.cprsp.co.uk/

goal is to move towards zero deaths or severe serious injuries in the Partnership area by 2040.

13.15 Cambridgeshire County Council Heavy Goods Vehicle (HGV) Policy[18] was adopted by the Highways and Transport Committee in October 2022 and sets out the County Council's approach to managing HGV movements across the county.

13.16 Housing Estate Road Construction Specification[19] (2023) (HERCS) sets out the standards and specification required for the construction for all highways maintainable at public expense within Cambridgeshire.

13.17 General Principles for Development[20] sets out the principles for design and implementation for new development related highway infrastructure in Cambridgeshire.

13.18 The Design Manual for Roads and Bridges[21] (DMRB) suite of documents is applied within Cambridgeshire to major works comprising complex junction design (i.e. traffic signal installations), structures/ culverts design, AIP, Road Safety Audit process etc which are outside the remit of the HERCS document.

13.19 The Road Traffic Regulation Act 1984[22] relates to the processes and procedures relating to the imposition of a new speed limit on New Bridge Lane.

13.20 Cambridgeshire County Council Street Lighting Specification[23] (2016) provides the standards required for new street lighting infrastructure to comply with the adoption principles of Cambridgeshire's long term PFI contract for the implementation and maintenance of new adoptable infrastructure.

[18] https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/roads-and-pathways/heavy-or-abnormal-loads-on-the-highway/heavy-goods-vehicle-hgv-policy
[19] https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/roads-and-pathways/highways-development
[20] https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/roads-and-pathways/highways-development
[21] https://www.standardsforhighways.co.uk/dmrb/
[22] https://www.legislation.gov.uk/
[23] https://www.cambridgeshire.gov.uk/asset-library/imported-assets/Street_lighting_Development_Specification.pdf

13.21 Cambridgeshire County Council's Highway Asset Management Policy, Strategy and Highway Operational Standards[24] are also relevant to the proposed DCO in the context of traffic and transport issues.

Construction Phase impacts

Negative

13.22 The proposed development will increase the volume of traffic on both the local and strategic highway network albeit that the proposed Construction Traffic Management Plan ('CTMP') states that construction traffic will restrict construction traffic during the network peak hours of 8:00-9:00, 15:00-16:00 and 17:00-18:00.

13.23 Whilst this is welcomed the CTMP does not go into sufficient detail in the County Council's view about how this will be achieved, citing the use of Automatic Number Plate Recognition ('ANPR') cameras and control documents to comply with the restrictions. The LHA will require further details of how the restrictions are to be achieved in practice with reference to the need to comply with GDPR regulations when using ANPR data.

13.24 It is imperative that proactive, robust and enforceable controls are imposed on the movements of construction traffic from the outset of the construction phase.

Access Points for construction traffic:

13.25 The Highway Authority would seek that all works locations have estimated levels of HGV and heavy plant movements listed within Appendix A of the Construction Traffic Management Plan, the numbers should show the total number likely to use the junction and the maximum likely daily flows.

[24] https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-plans-and-policies/highway-policies-and-capital-maintenance-programme

13.26 Further specific mitigation measures proposed are in the table below.

Site Reference	LIR Comments
COA1 - off Cowley Road into the existing Cambridge Waste Water Treatment Plant	The Highway Authority would seek that all movements of construction plant with a gross weight in excess of 3.5 tonnes be limited to the hours of 09.30-15.30hrs Monday to Friday to avoid conflict with the peak hour movements into and out of Cambridge. Access to the Cowley Road site crosses two cycle routes which are heavily used as commuter routes.
CA1 - off Fen Road Work OA1 - off the private track leading to the substation off Fen Road	The only vehicular access to Fen Toad is through the City of Cambridge, therefore, The Highway Authority would seek that all movements of construction plant with a gross weight in excess of 3.5 tonnes be limited to the hours of 09.30-15.30hrs Monday to Friday to avoid conflict with the peak hour movements. This route also has to cross a level crossing. The impact on the ability of construction traffic to access the proposed sites and the impact on the local residents must be also be taken into consideration.
CA2 - west off Horningsea Road, south of the A14 Work CA3 - east off Horningsea Road, south of the A14 OA2 - east off Horningsea Road, south of the A14 COA2 - west off Horningsea Road to fields north CA8 - west off Horningsea Road, north of the A14 CA9 - east off Horningsea Road, south of the A14 CA7 - between two fields south-west of Biggin Hall COA6 - east off Horningsea Road CA16 - south-east from the layby on Clayhithe Road COA9 - off Clayhithe Road leading into the private track at Grange Farm CA20 - off Clayhithe Road into Hatridge's Lane leading towards Riverside Farm	In principle these sites are acceptable to the Highway Authority with the caveat of note 1 above and that suitable routing agreements are in place.
CA4 - off A14 mainline westbound carriageway to land between the	All these locations seem to be in land under the control of National Highways as the National Highway Authority.

A14 mainline and A14 Westbound On-Slip Road CA5 - off A14 mainline westbound carriageway to land between the A14 mainline and A14 Eastbound Off-Slip Road CA6 - off A14 Eastbound Off Slip Road to land between the A14 mainline and A14 Eastbound Off-Slip Road immediately south of the Off-Slip Road	
CA10 - south off Low Fen Drove Way, south of Low Fen Drove Way COA3 - north off Low Fen Drove Way COA4 - south off Low Fen Drove Way CA11 – east off Low Fen Drove Way CA12 - private track leading east off Low Fen Drove Way	Low Fen Drove Way is not a melted highway and as works will be needed to ensure that it is capable if carrying the required construction traffic. Procedures of continuing NMU access through out the construction period must also be provided.
CA13 - private track leading south-west off Station Road (private road) COA7 - north and south off the private track south-east of Gayton Farm OA3 - off the private track south-east of Gayton Farm CA14 - off the private track east of Gayton Farm CA15 - off the private track north-east of Gayton Farm CA18 - off the private track leading east through Grange Farm OA6 - off the private track leading south around the boundary of Grange Farm COA8 - west and east off the private track east of Grange Farm COA10 - between two fields north-east of Grange Farm CA21 - off south side of access into Riverside Farm to the field south of Hatridge's Lane CA23 - north off track leading west from Hatridge's Lane to the west of Riverside Farm CA22 - east off Hatridge's Lane onto track through Riverside Farm OA7 - off the adopted public highway section of Hatridge's Lane north along the private section of Hatridge's Lane COA11 Vehicular access to the west and east off Hatridge's Lane north of Riverside Farm	While these work locations are listed as being off 'private' roads details of how these roads interact with the adopted public highway should be provided.
CA17 - between two fields north of footpath 130/8 and east of footpath 130/10	

CA24 - west and east off the track that forms footpath 247/10	
CA25 - east off Burgess's Drove COA13 - east off Burgess's Drove CA26 - west off Burgess's Drove CA27 - west off Burgess's Drove COA12 - south off Burgess's Drove	The Highway Authority would seek that all movements of construction plant with a gross weight in excess of 3.5 tonnes be limited to the hours of 09.30-15.00hrs during the term time of the Waterbeach Community Primary School as Bannold Road, the only access to Burgess' Drove is used by significant numbers of carers and children to access the school.
COA14 - north off Bannold Road COA15 - north and south between two fields east of Work No. 30, 33, 34 and 37 28 COA16 - east off Bannold Drove COA17 - east off Bannold Drove COA18 - west off Bannold Drove	The Highway Authority would seek that all movements of construction plant with a gross weight in excess of 3.5 tonnes be limited to the hours of 09.30-15.00hrs during the term time of the Waterbeach Community Primary School as Bannold Road, used by significant numbers of carers and children to access the school.

Mitigation

13.27 The proposed mitigation measures such as Traffic Management at the 'temporary' site construction access and the proposed additional arm to the signalised junction on the eastbound offslip are agreed in principle having been reviewed by the relevant CCC teams. Further Road safety Audits (Stages 2-4) and Signal Design Audits will be required once the design has progressed beyond its (currently) preliminary Stage. CCC will require the works to be delivered via a Section 287/S38 'side agreement' with appropriate Bond provisions to ensure that CCC is not at risk were the developers to be unable to complete the works in a satisfactory manner.

13.28 The proposed access to the site from Horningsea Road (B1047) is acceptable in principle. However, the detailed design will need to consider making adequate provision for all users. If the bridge deck is redesigned to accommodate increase non-motorised users as shown in the Road Safety Aduit Stage 1 plans then careful consideration of providing for all users must be undertaken. This will include equestrian use. The provision of a suitable controlled crossing to allow such users to cross the slip roads on and off the A14, may only be achievable using land that is outside the control of the Local Highway Authority. This land may be under the control of the National Highway Authority and as such the applicant should seek their involvement as quickly as practical.

13.29 Many of the proposed construction access points to the north of Waterbeach village will necessitate construction traffic using the existing network of adopted public highway within the village. Many of these roads are Victorian or earlier in layout and will therefore not necessarily easily accommodate large construction vehicles. It has been drawn to the applicant's attention that the developers of Waterbeach (new Town) have created a purpose built construction access off the A10 just north of the Cambridge Research Park. This could provide access to much of the northern section of the proposed pipeline. As this sewer is there for the benefit of the future residents of Waterbeach the developers may be prepared to permit the use of this route, which would remove much if not all the construction traffic from the village of Waterbeach. The Highway Authority seeks evidence that the applicant has approached the developers of Waterbeach (Urban and Civic and RLW) exploring the use of the haul route internal to the new development site and would request that the results of such contact be made public.

13.30 Notwithstanding that in the Applicants ES Chapter 7: Air Quality [APP-039], concludes the effect on air quality is not significant, Cambridgeshire County Council would encourage the Applicant to minimise the impact at both the construction and operational stage. This would include a minimum of EURO VI for it's own fleet and incorporate a condition limiting access to the site to minimum EURO VI for contractors and subcontractors. This could include on-site equipment to a minimum standard of EURO VI or alternative Fuels, such as LNG. This would complement and support the accompanying Climate Resilience and Carbon mitigations as part of the application as well as the Applicant's Net Zero Strategy to 2030. Note the County Council's response to ExA Q1 [PD-008], Question 4.5.

Operational phase impacts

Negative

13.31 The Operational Phase will increase the number of vehicles on the Strategic and Local Highway networks, albeit that the Operational increase will be lower than that experienced in the construction phase.

13.32 The Applicant's 'Environmental Statement Chapter 19: Traffic and Transport' [APP-051], page 16, identifies that operational HGV movements accessing the Waste Water Treatment Plant (WWTP) in the tenth year of operation of the proposed development

(2038) will be 146 per day. The Applicant's 'traffic flow diagrams' [APP-146] identify the 2038 base level of HGV traffic using the junction that will form access to the WWTP during peak hours totaling just 16. It is clear from this comparison that the operation of the proposed development will introduce a substantial number of new HGVs to this junction, well in excess of the number that would ordinarily be using the junction. CCC is concerned that the introduction of such a volume of HGVs has the potential to cause excess damage to the highway which would be directly attributable to the proposed development.

Mitigation

13.33 The mitigation measures in the form of a proposed additional arm to the signalised junction on the eastbound offslip are agreed in principle having been reviewed by the relevant CCC teams. Further Road safety Audits (Stages 2-4) and Signal Design Audits will be required once the design has progressed beyond its (currently) preliminary Stage. CCC will require the works to be delivered via a Section 287/S38 'side agreement' with appropriate Bond provisions to ensure that CCC is not at risk were the developers to be unable to complete the works in a satisfactory manner.

13.34 The proposed enhancements to walking and cycling routes to and from the site are noted. However, the proposed measures do not include any enhanced provision for equestrian users. Further consideration must therefore be given to the needs of Equestrian users and the design of the shared use route across the two slip roads and the A14 overbridge must be revised to provide a safe route for all non-motorised users.

<u>Draft Development Consent Order and Work Plans</u>

<u>Requirements and Obligations</u>

13.35 It should be a requirement of the DCO that the Construction Traffic Management Plan ('CTMP') and the Code of Construction Practice ('CoCP') are approved by the LHA prior to the commencement of any works associated with the proposed development.

13.36 Schedule 3 'Streets Subject to Street Works'; Schedule 4 'Streets Subject to Alteration of Layout'; Schedule 5 'Streets to be Temporarily Closed'. The schedules should identify whether an affected street is a public highway or a private route. Where a street affected by the proposed development has both public and private elements,

these should be clearly identified in the schedules. This will provide clarity both to the LHA and the public on the impact of the proposed works.

13.37 Under section 59 of the Highways Act 1980, local highway authorities are able to recover their expenses for repairing excess damage caused to the highway by extraordinary levels of traffic. CCC requires that the Applicant commits to cover the cost of repairs to the highway that are attributable to the operation of the proposed development, either by providing a protective provision to this effect in the DCO or through a separate legal agreement to be reached during the examination period.

13.38 *Part 3, Article 10.* This article should require the undertaker to agree the timing and nature of its works with the LHA prior to commencement and submit Permits via DfT StreetManager in advance of any works on the public highway and / or any temporary closures or traffic management to enable the Highway Authority to co-ordinate the network.

13.39 *Part 3 Articles 10, 11, 12.* These articles should make reference to the protective provisions.

13.40 *Part 3 Article 13.* For the avoidance of doubt, public rights of way (PROW)_are highways and any proposals to work within or temporarily alter PROW should be subject to the same protective provisions as any other highway. This should be made clear within the DCO. Article 13 should also clearly link to the CTMP and CoCP in respect of the management of PROW during the construction phase of the development (subject to CCC's required changes being integrated to those documents).

13.41 *Part 3 Article 14.* The LHA should be given a direct role in approving the design and construction of accesses that are within the public highway. The construction of accesses, even if only temporary, are a matter of road engineering. The current drafting of the DCO [AS-139] outlines that accesses will be approved by the Relevant Planning Authority (identified as the district councils) *after consultation with* the LHA. As stated elsewhere in this document, the county council are the Minerals and Waste Local Planning Authority. As such are the relevant planning authority. This should be reflected in the DCO.

13.42 *Part 3 Article 15.* The DCO should include a maintenance period, to be agreed with the LHA, during which time the completed and provisionally certified works to the

highway are maintained by the Applicant. This would extend beyond the remedy of identified defects as identified in Schedule 6 paragraph 9.

13.43 *Works Plans [APP-017]; General Arrangement Plans [APP-016]; Highways and Site Access Plans [APP-025].* CCC has made numerous points in its Relevant Representations [RR-001] in relation to the above plans. The intention of these comments is principally to ensure the plans provide a higher degree of clarity to anyone reviewing them, particularly the public, but also to remove any ambiguity over the extent of the proposed works that relate to the public highway network. These comments remain the same and can be viewed in sections 13.19 to 13.43 of the Relevant Representations [RR-001].

TOPIC 12 Water Resources

Policy Context

Local Plan Policy

Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) (MWLP):

14.1 Objective 4 of the MWLP is to protect water resources and quality, mitigate for flood risk from all sources and seek to achieve a reduction in overall flood risk.

14.2 Policy 1 of the MWLP requires that development should set out how they will be resilient to a changing climate, taking account of the latest available evidence on the impact of climate change, including measures to manage water resources efficiently.

14.3 Policy 22 of the MWLP requires that development should ensure that there is no significant adverse impact on: (a) the quantity and quality of surface or groundwater resources; (b) the quantity and quality of water abstraction currently enjoyed by abstractors unless acceptable alternative provision is made; and (c) the flow of groundwater at or in the vicinity of the site.

Cambridgeshire County Council Flood and Water Supplementary Planning Document[25] (adopted by the districts)

14.4 The SPD provides guidance on the approach that should be taken to design new developments to manage and mitigate flood risk and include sustainable drainage systems (SuDS). SuDS mimic natural drainage to manage surface water run-off and can also deliver wider benefits such as providing green areas for biodiversity and recreation.

Construction Phase impacts

Positive

14.5 There are no positive impacts identified for the construction phase with regard to Water Resources.

[25] https://www.cambridgeshire.gov.uk/asset-library/Cambridgeshire-Flood-and-Water-Supplementary-Planning-Document.pdf

Neutral

14.6 There are no neutral impacts identified for the construction phase of the proposed development with regard to Water Resources.

Negative

14.7 There has been no discussion of potential settlement of surface water before discharge as a way to manage sedimentation during construction.

Mitigation

14.8 Details of how sediment will be managed before discharge into the surrounding water environment are required from the Applicant.

Operational phase impacts

Positive

14.9 There are no positive impacts identified for the operational phase with regard to Water Resources.

Neutral

14.10 There are no neutral impacts identified for the operational phase with regard to Water Resources.

Negative

14.11 Potential for groundwater needing to be accommodated in the surface water system if it emerges. No mitigation provided within the proposed surface water system. This could lead to inundation of the surface water system which would result in flooding.

14.12 Proposals for putting large volumes of the captured surface water runoff back into the wastewater treatment plant. Whilst this is accepted to occur for certain parts of the scheme, this should not be the default for the wider proposals. The concern is that this could lead to surcharging of the treatment plant in larger storm events and this would lead to more regular discharging of effluent from the system into the river Cam.

14.13 The impermeable areas do not appear to align for the area of site which is discharging water, which could lead to an increased discharge rates compared to that

which is actually draining from the site, which could have adverse impacts on the surrounding water environment.

14.14 Rainwater harvesting tanks have been provided, which are supported by the LLFA, however they don't have an overflow and therefore it is not clear where water will go in the event that the tanks are full when a storm event occurs. This could lead to the rainwater harvesting tank reaching capacity and overspilling, without any formal means of outfall.

14.15 Further treatment of runoff from the access road may be required and if this isn't provided, could lead to pollution of the receiving surface water body which would have detrimental environmental impacts.

Mitigation

14.16 Provide nominal storage for groundwater volumes in the network, alternatively, if this is not known, a suitable overflow and attenuation area.

14.17 Provide a separate surface water drainage strategy to manage runoff in line with the drainage hierarchy, so infiltrating surface water, followed by discharge to the watercourse, followed by discharge to the surface water sewers.

14.18 Clarify where the impermeable areas have come from but ensure that the discharge rates are relevant to the drained areas for each catchment, to ensure that there is not an influx of surface water into any receiving surface water body.

14.19 Provide an overflow for the rainwater harvesting tank and ensure that water will be managed and discharge from the site in a controlled manner. The rainwater harvesting tanks cannot be used as attenuation.

14.20 Provide an additional form of treatment through the use of SuDS for the surface water draining from the access road, unless demonstrated it is not required.

Draft Development Consent Order and Work Plans

Requirements and Obligations

14.21 Requirement 9 for the CEMP includes the listed out components to cover in the CEMP. Whilst this covers water quality, there are also concerns about the volumes of discharge from the site and how these are managed. We would want to

see that water quality and quantity are both addressed under the CEMP requirement as it relates to both the enabling phase and subsequent phases.

END