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Cambridge City Council

Local Impact Report

Application by Anglian Water Limited for an Order Granting Development Consent for the Cambridge Waste Water Treatment Plant Relocation project (CWWTPR) (ref: WW010003)

Deadline 1

20th November 2023

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1. Introduction

1.1 This report comprises the Local Impact Report (LIR) of Cambridge City Council (the City Council) in its capacity as the local planning authority for part of the area covered by this application for a DCO.

1.2 The City Council has had regard to the purpose of LIRs as set out in s.60 Planning Act 2008 (PA2008) (as amended), the Department for Communities and Local Government (DCLG) guidance for the examination of applications for development consent, and the Planning Inspectorate's Advice Note 1: Local Impact Reports, in preparing this LIR.

1.3 Where reference is made to 'the Councils' this means Cambridge City Council and South Cambridgeshire District Council insofar as they are preparing a joint North East Cambridge Area Action Plan (NECAAP) and a joint local plan, to be referred to as the Greater Cambridge Local Plan (GCLP).

1.4 Cambridgeshire County Council, Cambridge City Council and the District Council each provide a separate LIR.

2. Scope

2.1 This LIR only relates to the impact of the proposed development as it affects the administrative areas of Cambridge City Council.

2.2 For the sake of clarity given that the proposed development is a waste water management scheme it would fall under the remit of Cambridgeshire County Council as the Waste Planning Authority if it had been the subject of a planning application under the Town and Country Planning Act 1990. It would therefore in such circumstances be assessed against the policies of the Cambridgeshire and Peterborough Minerals and Waste Local Plan.

2.3 In setting out the City Council's assessment of the Proposed Development against the Cambridge Local Plan, taking into account relevant national policy, within this LIR it should be noted that the City Council does not attempt to mimic an exercise under s38(6) of the Planning and Compulsory Purchase Act 2004 and the s70 of the Town and Country Planning Act 2008. This would clearly be inappropriate not

only because it is not the relevant planning authority for developments such as the proposed scheme but also because the 'planning balance' exercise involved under the Planning Act 2008 is solely one for the Examining Authority and ultimately the Secretary of State. Where the policy approach would require a further assessment to be carried out against public benefits by the decision maker the City Council therefore does not carry that final assessment out.

2.4 The LIR relies principally upon the Applicant's description of the development as set out in Volume 2, Chapter 2 of the Environmental Statement (paragraph reference 1.1.2) [APP 034].

2.5 The City Council has noted the Examining Authority's written questions and requests for information (ExQ1) issued on 24 October 2023. The City Council has not been able to address all the questions raised in ExQ1 directed to it that may have been reflected or addressed in the LIR. This is given the time constraints and in particular the requirement for the LIR to be reported to the Council's Planning, Transport and Scrutiny Committee for approval on 9th November. The City Council will set out its answers to ExQ1 in a separate document to be submitted by Deadline 1 on 20 November and therefore this LIR should be read together with those answers'.

Purpose and structure of the LIR

2.6 Section 60(3) of the Planning Act 2008 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."

2.7 This report provides a description of the area in and around the Order Limits of the draft DCO to contextualise expected likely impacts. The report also comments on the mitigation measures proposed by the Applicant, and, as and where appropriate, sets out proposals by the City Council for alternative or additional measures to reduce the potential impacts of the scheme.

2.8 Likely impacts are addressed under headings by topic. Under each heading the key issues for the City Council and the local community are identified. Commentary is provided on the extent to which the Applicant addresses these issues by reference to the application documentation, including the DCO articles, requirements and obligations, as relevant.

2.9 For each topic area, this report sets out:

- National and local policy context;
- The positive, neutral and negative impacts of the development during the construction phase, as anticipated by the City Council;
- The positive, neutral and negative impacts of the development during the operational phase, as anticipated by the City Council;
- Where applicable, the positive, neutral and negative impacts of the development during the decommissioning phase, as anticipated by the City Council;
- The suitability of the measures proposed by the Applicant to avoid, reduce, mitigate or compensate for the identified impacts;
- Where applicable, proposals by the City Council for alternative or additional measures to better address the identified impacts;
- Where applicable, the need for obligations and requirements.

3. Description of the Development

3.1 A detailed description of the development is provided in the ES Chapter 2 (Doc Ref 5.2.2 [APP 034] however the City Council would highlight the following details of each of the key elements.

3.2 **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 CWWTP contain structures which are no longer in use as part of the waste water treatment process and so are non-operational assets.

3.3 **The proposed Cambridge Waste Water Treatment Plant (ReWWTP):** The site for the proposed new ReWWTP is a greenfield site located to the north-east of Cambridge and 2km to the east of the existing 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.

3.4 **The waste transfer tunnel:** The land required for the construction of the new waste water transfer tunnel to transfer flows from the existing CWWTP to the proposed ReWWTP and final effluent and storm pipeline,

would be installed beneath land located to the west of Horningsea Road, south of the A14. The River Cam separates the land parcels with land to the west comprising of a small area of floodplain grazing marsh. The new waste water transfer tunnel and Waterbeach pipelines would pass beneath and continue on underneath the River Cam and West Anglian Mainline (WAML) railway.

3.5 **The proposed final effluent discharge outfall on the River Cam:** This area would be located immediately north of where the A14 bridges over the river Can 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.

3.6 **The two new pipelines (rising mains) for the transfer of waste water to the ReWWTP 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 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.

3.7 **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.

4. Planning Policy

4.1 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 he thinks 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.

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

4.3 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').

4.4 The City 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 City Council's view not a matter for the LIR.

4.5 The City Council would however point out that under both s 104 and 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".*

National Planning Policy Framework 2023

4.6 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 plans making pursuant to the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004.

4.7 The NPPF makes it clear at paragraph 5 that it "*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).” [emphasis added].

4.8 It is therefore clear that consideration should be given to the relevant part of the NPPF where they raise relevant issues which relate to the proposed development. In the City Council’s view the following NPPF sections are relevant:

- Achieving sustainable development - NPPF Section 2
- Government’s objective of significantly boosting the supply of Homes – NPPF Section 5, Paragraph 60
- Achieving well-designed places - NPPF Section 12
- Climate Change – NPPF Section 14

National Infrastructure Plan 2016–2021

4.9 The National Infrastructure Delivery Plan (NIDP) published in March 2016 by the Infrastructure and Projects Authority, sets out the government’s plans for economic infrastructure and identifies those which will support the delivery of housing and social infrastructure. It does not contain policies as such but is considered relevant.

4.10 Paragraph 9.2 of the NIDP acknowledges that water services are likely to come under increasing pressure because of population growth and a changing climate, whilst wastewater treatment infrastructure is essential for public health and a clean environment.

Local Development Plan Policies, Guidance and Supporting Evidence

4.11 The development plan as defined under s38 of the Planning and Compulsory Purchase Act 2004 for the whole area which is covered by this DCO application comprises the following:

- Cambridge City Local Plan 2018 **[Appendix 1, GCSP-3]**
- Cambridge Policies Map 2018 **[Appendix 1, GCSP-4]**
- South Cambridgeshire Local Plan 2018 **[Appendix 1, GCSP-1]**
- South Cambridgeshire Policies Map 2018 **[Appendix 1, GCSP-2]**
- Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021 **[Appendix 1, GCSP-41]**

4.12 It is accepted that the policies within these plans do not have the same status and function for decision making under the Planning Act 2008 as under the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Act 2008. They do appear however to be important and relevant matters under ss104 and 105.

4.13 The City Council has compiled a document library containing historic, current and emerging development plans, supplementary planning documents, relevant reports and supporting evidence and other publications referenced in this LIR. This is in **Appendix 1**.

Ministerial Statements

4.14 On 24 July 2023 the Prime Minister and Secretary of State for Levelling Up, Housing and Communities Government announced a long-term plan for housing including further plans for regeneration, inner-city densification and housing delivery across England and in particular identified Cambridge (along with central London and central Leeds) for regeneration and renaissance and "*committing to transformational change in Cambridge".* This is also addressed in Section 5 of this report.

4.15 The statement specifically refers to Cambridge being "supercharged as Europe's science capital". It also states in terms:

"The government will also take definitive action to unblock development where it has stalled, providing £500,000 of funding to assist with planning capacity. Cambridge City Council, Anglian Water, Land Securities PLC and Homes England will work together to accelerate the relocation of water treatment works in Northeast Cambridge (subject to planning permission), unlocking an entire new City quarter – delivering approaching 6,000 sustainable well-designed homes in thriving neighbourhoods – as well as schools, parks and over 1 million square feet of much needed commercial life science research space.

5. Assessment of Likely Impacts

5.1 The following sections identify what the City Council considers are the relevant overall topics in the context of relevant national and local planning policies.

5.2 Section 6, Topic 1 sets the strategic development plan context and the planning benefits that would arise from the relocation of the CWWTP if the

DCO is approved and why these benefits should be given weight in the decision-making process.

5.3 For subsequent topics, having considered relevant national and local planning policies, the LIR sets out whether the application 'accords' with them albeit of course this is not part of applying the approach under s38(6) Planning and Compulsory Purchase Act 2004 and the s70 of the Town and Country Planning Act 2008.

5.4 The following sections also consider the adequacy of assessment provided for each identified subject area and any potential impacts.

5.5 The baseline against which each subject area has been assessed is also discussed, setting out the City Council's views in respect of the adequacy of the assessments carried out, the base line data against which assessments have been based, and any mitigation proposed.

5.6 Consideration is also given to the Applicant's assessment of the proposal's compliance with local planning policies, having regard to the impacts identified and proposed mitigation measures.

6. TOPIC 1 – Strategic Development Plan Context

6.1 There is an interdependence between this DCO application process and the development plan process in so far as that process relates to the proposed redevelopment of the site of the existing Cambridge Waste Water Treatment Plant and the surrounding area. This is discussed later in this section. There is clear evidence through the emerging plan making processes of the significant planning benefits that would be enabled by the relocation of the Cambridge Waste Water Treatment Plant (the CWWTP site).

6.2 Given the development plan process has typically involved either a joint strategy across separate plans or plans that are jointly prepared, in this section reference is largely made to 'the Councils' when setting out the position. This relates to South Cambridgeshire District Council and Cambridge City Council jointly, as local planning authorities. Only where there was a separate process or position is reference made to the Council separately.

6.3 The DCO application correctly highlights South Cambridgeshire District Council's and Cambridge City Council's shared long-held ambition to

regenerate the part of the city within which the existing CWWTP is located, as set out in the remainder of this section. The site of the CWWTP and the surrounding area has been referred to in two main ways over the last 20 years:

- Cambridge Northern Fringe East – this comprises the area included within the DCO as far east as the railway line plus the site of Cambridge North Station and the rail sidings adjoining it. This comprises an extensive area of underutilised, previously developed land, where regeneration potential has been effectively sterilised due to the constraint arising from odour contours around the plant, such that sensitive uses such as residential development, and potentially office provision, are considered unsuitable in that area. This was the area addressed in planning policy up to and including the extant Local Plans. The area can be seen on the extant Policies Map 2018 for each Council's area (see **Appendix 1, GCSP-2** and **Appendix 1, GCSP-4**).

- North East Cambridge – this is a wider area as identified in the Proposed Submission North East Cambridge Area Action Plan (NECAAP) [**Appendix 1, GCSP-7 and no.8**) and emerging Greater Cambridge Local Plan First Proposals (Regulation 18 Preferred Options) (GCLP) [**Appendix 1, GCSP-5,** Policy S/DS: Development Strategy, page 29). In addition to the Cambridge Northern Fringe East area, it also includes Cambridge Science Park lying to the west of Milton Road and existing employment areas to the south in order to look at this key site in a comprehensive way to maximise the regeneration potential.

History of the North East Cambridge area

6.4 For over 20 years the existing CWWTP site and surrounding area has been promoted through consecutive statutory planning policy documents for redevelopment, to make the most of the Greater Cambridge area's sustained economic growth and, more recently, the significant investment in sustainable transport provision that serves the North East Cambridge area. Greater Cambridge is the term the Councils now use for their combined administrative areas, recognising the strong functional relationship between the City and its rural hinterland, including fringe sites that straddle the administrative boundary, such as North East Cambridge.

6.5 A document capturing the Chronology of the investigations into the feasibility of redevelopment of the Cambridge Waste Water Treatment

Plant site (November 2021) [**Appendix 1, GCSP-18**~~)~~] is a supporting document for the emerging North East Cambridge Area Action Plan (see Emerging Development Plan Context section below). It shows the long history of consideration of the site of the existing plant and the surrounding underutilised brownfield area. Key aspects of the history are discussed below.

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6.6 The Cambridge Northern Fringe East area was first identified as a reserve of land for future growth and redevelopment in the Cambridgeshire Structure Plan 1989, for uses where an edge of Cambridge location was essential and not just desirable. It was excluded from the Cambridge Green Belt in the Cambridge Green Belt Local Plan 1992 prepared by Cambridgeshire County Council.

6.7 In 1992 Cambridge City Council, South Cambridgeshire District Council and Cambridgeshire County Council and the landowners in the area commissioned a Feasibility Study of the CWWTP and Chesterton Sidings (the area around what is now Cambridge North Station) area. This is the first recorded study identified that considered the relocation of the CWWTP. It explored various possibilities, including a new Parkway Station and high technology business park. It concluded that the cost of relocating the CWWTP would result in development not being viable at that time.

6.8 During this period, the South Cambridgeshire Local Plan 1993 was adopted and included policies pursuant to the 1989 Structure Plan for the Chesterton Sidings area lying within the district and did not address the area of the CWWTP or surrounding area lying in Cambridge City Council's area. The Cambridgeshire Structure Plan 1995 confirmed the Cambridge Northern Fringe East site as safeguarded for uses that had an essential need to be located within Cambridge and could not be accommodated elsewhere. The Cambridge Local Plan 1996 described the Northern Fringe as an area of special restraint and a reserve of land for development after 2001. A new parkway station was explored. It included policies encouraging urban redevelopment and regeneration on the Northern Fringe area within the City. Around this time the area was considered for a range of uses including employment and sporting facilities.

6.9 This early part of the planning history of the CWWTP site is of general interest but the plans themselves are not provided as reference documents. The plans from 2000 onwards are of more direct relevance to

the DCO and are provided in appendices to this LIR. Further information on the earlier plans can be provided to the ExA on request.

6.10 Regional Planning Guidance Note 6: Regional Planning Guidance for East Anglia to 2016 was approved in 2000 **[Appendix 1, GCSP-10]**. It established a strategy for the Cambridge Sub-Region in Policy 22 that made a significant change from the previous development strategy where a substantial proportion of development had been dispersed to the villages and market towns around Cambridge, to a strategy that focused more development within and on the edge of Cambridge and in a new settlement close to Cambridge and well connected to it by high quality public transport.

6.11 The Cambridgeshire and Peterborough Structure Plan 2003 **[Appendix 1, GCSP-11]** gave effect to the development strategy for the Cambridge area that was set by RPG6 and it forms the basis for the strategy still being delivered today. The Cambridge Northern Fringe East site was included as part of the development strategy for the Cambridge Sub-Region (as the wider Cambridge area was called at that time, which included the area out to the ring of market towns beyond South Cambridgeshire). It was referred to even then as a "pre-existing commitment" in the Structure Plan at Table 9.1, page 122 **[Appendix 1, GCSP-11]**. Indeed, the Cambridge North Station was proposed in the Structure Plan "to support the development of the Cambridge Northern Fringe" (Structure Plan Policy P9/9, page 120).

6.12 The strategy in the Structure Plan 2003 was a blend of the urban site of Cambridge Northern Fringe East and releases of land on the edge of Cambridge from the Cambridge Green Belt, whilst retaining any areas required to maintain the purposes of the Cambridge Green Belt in the context of delivering sustainable development (Structure Plan Policies P9/1, P9/2c and P9/3, pages 104, 108 and 111 respectively**) [Appendix 1, GCSP-11**) and also including a new settlement north west of Cambridge, now being delivered as Northstowe. Cambridge Northern Fringe East is one of the last strategic sites within or on the edge of Cambridge identified in the 2003 Structure Plan that has still to come forward.

6.13 On conclusion of the Structure Plan process, the potential of the Cambridge Northern Fringe East area was revisited again in 2003-04 when an independent viability study by Atisreal concluded there remained a substantial deficit not conducive to bringing the site forward for alternative uses.

6.14 The South Cambridgeshire Local Plan 2004 allocated the rail sidings area for sustainable mixed-use development, consistent with the 2003 Structure Plan. The sidings area lay outside the area constrained by the WWTP odour contours and adjacent to the site proposed for the new Cambridge North Station.

6.15 The Cambridge Local Plan adopted in 2006 **[Appendix 1, GCSP-13]** included an allocation for the Cambridge Northern Fringe (East) area. The independent Inspector's Report **[Appendix 1, GCSP-14]** (at section 2.8 and paragraphs 5.3.10, 7.6.2 and 9.19.4) acknowledged that a policy in the plan allocating the Cambridge Northern Fringe site for redevelopment for principally residential uses could not fully go ahead unless the Waste Water Treatment Works was relocated, but found the proposed allocation sound, commenting that "the housing market in the City is buoyant, [and] residential land is valuable" and that "There are particular difficulties with the redevelopment of the Northern Fringe, but several years are available to Plan and prepare for this development".

6.16 Further viability and feasibility work by Atisreal for Cambridge City Council in 2006 concluded again that the cost of relocation rendered redevelopment of the area as a whole unviable. It went on to suggest that this position would remain unless an alternative source of funding for the reprovision of the Waste Water Treatment Plant could be secured. Subsequent policy approaches in a draft Cambridge Core Strategy sought to provide flexibility in terms of what could be achieved if the Waste Water Treatment Plant were to be relocated and if it were not. In the case of the CWWTP not being relocated, uses would be limited to types of industrial-led development that would not be sensitive to the odour issues. The draft Core Strategy was not pursued to completion.

6.17 A further viability report in 2008 by Roger Tym and Partners **[Appendix 1, GCSP-15]** for Cambridgeshire Horizons on behalf of a group of interested parties including the Councils, Anglian Water and Network Rail reviewed the 2006 Atisreal report and concluded it remained an accurate summation of current viability (paragraph 3.29). However, the report drew attention to a change of note, namely that: "*PPS3 places a far higher emphasis on practical delivery of housing than its predecessor Guidance and it would be very difficult for the City Council and SCDC to demonstrate robustly that a comprehensive development concept could be implemented within the next five years. Even if it was practical to arrange the relocation of the CWWTP within this period, redevelopment is patently not viable*" **[Appendix 1, GCSP-15 -** paragraph 3.30 first bullet

point**]**. The study recommended an employment focused approach, apart from on the railway sidings lying outside the odour contours where it concluded residential development would be viable whilst recognising it 'is not the visionary concept for a new 'quarter' for Cambridge as were the earlier proposals" **[Appendix 1, GCSP-15 -** paragraph 5.60**]**.

6.18 The East of England Plan 2008, updated RPG6 and carried forward the strategy contained in the Cambridgeshire and Peterborough Structure Plan 2003 largely unchanged and retained the development sequence that focused growth in the built-up area of Cambridge as the more sustainable location for development **[Appendix 1, GCSP-16,** Policy CSR1: Strategy for the sub-region, and paragraph 13.8**]**.

6.19 The South Cambridgeshire Site Specific Policies Development Plan Document 2010 **[Appendix 1, GCSP-17]** safeguarded the Chesterton Sidings area for the development of a railway station and interchange facility (Policy SP/17). The supporting text noted that Chesterton Sidings forms part of a larger area of land with development potential which includes land north of Cowley Road within Cambridge City, i.e. the CWWTP sites and surrounding area, and that the redevelopment potential of this and other land had been investigated on a number of occasions but found to be unviable or undeliverable (paragraph 6.5). The sidings area lay outside the area constrained by the CWWTP odour contours. The Cambridge North Rail Station envisaged in the plan was opened in 2017.

6.20 Cambridge City and South Cambridgeshire District Councils both submitted their Local Plans for examination in March 2014, with draft policies for Cambridge Northern Fringe East saying that the amount of development, site capacity, viability, time scales and phasing of development for the site will be established through the preparation of an Area Action Plan (AAP) to be prepared jointly between the two councils (see Extant Development Plan Context and Emerging Development Plan Context sections below for more information). As such, the Councils began work on a joint Area Action Plan (AAP) in 2014 with an Issues and Options consultation that considered different approaches to development depending on whether the existing CWWTP remained on its current site or was relocated. Anglian Water advised that a development option that included the relocation of the CWWTP would need to demonstrate that it was technically feasible, viable and deliverable. Following public consultation, the City Council concluded that an option involving relocation was not feasible and no further work was done on a joint AAP at that time.

6.21 In 2015 planning permission was granted for a new railway station at North East Cambridge (NEC). The new Cambridge North Station opened in 2017. The station includes an interchange with the St Ives Busway that opened in 2011. Together, this investment in strategic sustainable transport provision significantly enhanced access to and from the North East Cambridge area and was intended to support the redevelopment of the Northern Fringe area, although the benefits have yet to be fully realised.

6.22 The examination into the two local plans took over four years before both were formally adopted in 2018. The mirror policies for the Cambridge Northern Fringe East and Cambridge North railway station area (see Extant Development Plan Context section below) remained broadly unchanged from the versions submitted. This was because confirmation of the HIF award came post close of the Local Plan examination and adoption.

6.23 The Chancellor confirmed a funding award from the Housing Infrastructure Fund (HIF) of £227 million in 2019. This followed an expression of interest made in September 2017 by the Cambridgeshire and Peterborough Combined Authority ("the Combined Authority") for HIF funding to cover the cost of relocating the CWWTP. The bid had the support of Anglian Water and Cambridge City Council as owners of the CWWTP site and land adjoining the CWWTP respectively. The HIF funding award, under the Forward Funding stream, was made available to the uppermost tier of local authorities in England, for a small number of strategic and high-impact infrastructure projects.

6.24 The successful securing of HIF cannot be underestimated in its significance for the North East Cambridge area. After many years of viability studies concluding that the costs of relocation of the CWWTP could not be borne solely through the redevelopment of the North East Cambridge site, the HIF is the 'game changer' required to finally enable the viability constraint to be overcome and for the long-held ambition for regeneration of the North East Cambridge area to be realised.

Extant Development Plan Context

6.25 The current South Cambridgeshire Local Plan and Cambridge Local Plan, both adopted in 2018, include mirror policies that identify the potential strategic redevelopment opportunity for the Cambridge Northern Fringe East and Cambridge North railway station area (see South

Cambridgeshire Local Plan 2018 **[Appendix 1, GCSP-1** - Policy SS/4 and Figure 6**]** and South Cambridgeshire Adopted Policies Map 2018 **[Appendix 1, GCSP-2]** and also Cambridge Local Plan 2018, **[Appendix 1, GCSP-3 -** Policy 15 and Figure 3.3) and Cambridge Policies Map 2018 **[Appendix 1, GCSP-4]**. There are mirror policies in each plan and a figure showing the whole of the Cambridge Northern Fringe area across both Councils' areas, whilst the allocation in each plan applies only to the part of the site within that Council's area as shown on the Policies Map. The policies envisage the creation of a 'revitalised, employment focussed area centred on a new transport interchange'. They allocate the area for high quality mixed-use development, primarily for employment use as well as a range of supporting uses, commercial, retail, leisure and residential uses (subject to acceptable environmental conditions). They state that the amount of development, site capacity, viability, timescales and phasing of development will be established through the preparation of an Area Action Plan for the site prepared jointly by the two Councils.

6.26 Relocation of the CWWTP is not a policy requirement of the adopted 2018 Local Plans. At the time of preparation and adoption of the Local Plans, as explained above, the evidence was that relocation of the CWWTP was not viable. To that end a policy 'requiring' its relocation would not have been sound. Although the HIF bid had been made, confirmation of the HIF being awarded was not announced until March 2019, which was after the examination into the local plans had closed and indeed both plans had been adopted.

6.27 The adopted plans say that "Exploration of the viability and feasibility of redevelopment of the Cambridge Water Recycling Centre within Cambridge City to provide a new treatment works facility either elsewhere or on the current site subject to its scale will be undertaken as part of the feasibility investigations in drawing up the AAP" [see South Cambridgeshire Local Plan, paragraph 3.34 - **Appendix 1, GCSP-1** - and Cambridge Local Plan, paragraph 3.35 **- Appendix 1, GCSP-3**]. The adopted Local Plans make no reliance upon any employment development or residential development arising out of the allocation in order to meet housing and employment plan requirements up to 2031. This reflects the position that there was no evidence available to the Councils that there was a reasonable prospect of delivery on the site that required relocation of the CWWTP and the persistence of the odour constraint impacting surrounding land.

Emerging Development Plan Context

6.28 The HIF funding award was, as highlighted, a fundamental 'game changer' as it re-envisioned the future planning context of the last remaining strategic scale brownfield site in the Cambridge urban area. It did so by providing a solution to the viability constraint or block on the release of the existing CWWTP site to allow for redevelopment. The Councils in their roles as local planning authorities have determined the appropriate policy framework for the area through preparation of the draft North East Cambridge Area Action Plan and, more recently, the emerging Greater Cambridge Local Plan as discussed in the sections below.

North East Cambridge Area Action Plan (Proposed Submission, Regulation 19)

6.29 The Councils have prepared a Draft North East Cambridge Area Action Plan ('the NECAAP') **[Appendix 1, GCSP-7]**, as required by the policies for the Cambridge Northern Fringe East site in the respective adopted Local Plans 2018. As has been made clear in the emerging NECAAP, the deliverability of the NEC area and the indicative capacities for development are contingent on the DCO being granted.

6.30 The area covered by the Proposed Submission NECAAP and allocated has, as explained, been enlarged (from the Cambridge Northern Fringe East site included in the adopted 2018 Local Plans) to include Cambridge Science Park and Regional College to the west and additional employment land to the south (see North East Cambridge Area Action Plan Proposed Submission Policies Map 2021, **Appendix 1, GCSP-5a**) to ensure a comprehensive approach to the regeneration of this wider area that responds to the locational benefits of the area and the opportunities for sustainable travel that have been created by the opening of the Cambridge North Station and the interchange with the Cambridgeshire Busway and the Chisholm Trail cycle route as well as further proposed public transport and active transport routes to link to the Waterbeach New Town to the north.

6.31 The Draft Proposed Submission North East Cambridge AAP (Regulation 19) **[Appendix 1, GCSP-7]** and its suite of supporting documents and evidence base was considered and agreed by Cambridge City Council's Planning and Transport Scrutiny Committee on 11 January 2022 **[Appendix 1, GCSP-35]**, and South Cambridgeshire District Council's Cabinet on 10 January 2022 **[Appendix 1, GCSP-34, item 8]** for future public consultation, subject to the Development Control Order being

undertaken by Anglian Water for the relocation of the Waste Water Treatment Plant being approved.

6.32 The Proposed Submission NECAAP **[Appendix 1, GCSP-7 -** Section 3.1**]** identifies the vision for the area as:

- We want North East Cambridge to be a healthy, inclusive, walkable, low-carbon new city district with a vibrant mix of high-quality homes, workplaces, services and social spaces, fully integrated with surrounding neighbourhoods.

6.33 Policy 1 of the NECAAP **[Appendix 1, GCSP-7]**, includes the following overarching allocation as follows:

- The Councils will work to secure the comprehensive regeneration of North East Cambridge in particular the creation of a new high quality mixed-use city district, providing approximately 8,350 new homes, 15,000 new jobs, and new physical, social and environmental infrastructure that meets the needs of new and existing residents and workers as well as delivering tangible benefits for surrounding communities.

6.34 The vast majority of the proposed allocation of 8,350 dwellings in the NECAAP are constrained by the presence of the CWWTP. The areas identified for residential development are shown on the land use plan in the NECAAP as Figure 11 **[Appendix 1 ~~no.~~GCSP-7]**. The latest information on the area constrained by the odour contours as it affects the CWWTP is the Odour impact assessment for Cambridge Water Recycling Centre October 2018 **[Appendix 1, GCSP-20]** together with the December 2020 Addendum Report – Updated odour dispersion modelling for Cambridge Water Recycling Centre [Appendix 1, GCSP-20a], which is evidence prepared to support the NECAAP and refines the 400m consultation area in the Minerals and Waste Local Plan 2021, Policy 16 **[Appendix 1 no.41)**. Odour contours $C_{98,\ 1\text{-hour}}$ = 3, 5 and 6 ou_E/m^3 are identified as areas where residential development would be at risk of odour impact. The odour contours as they were in 2016 are shown in Fig 10 of the 2018 report **[Appendix 1, GCSP-20]**. The contours in Figure ~~5~~ 1 of the Addendum Report – Updated odour dispersion modelling for Cambridge Water Recycling Centre [Appendix 1, GCSP-20a} are ~~from~~ for 2013 and were a worst case scenario and cover a slightly ~~wider~~ smaller area in the updated modelling. Under either scenario, the majority of the NEC area where residential development is envisaged in the NECAAP lies within the odour contours.

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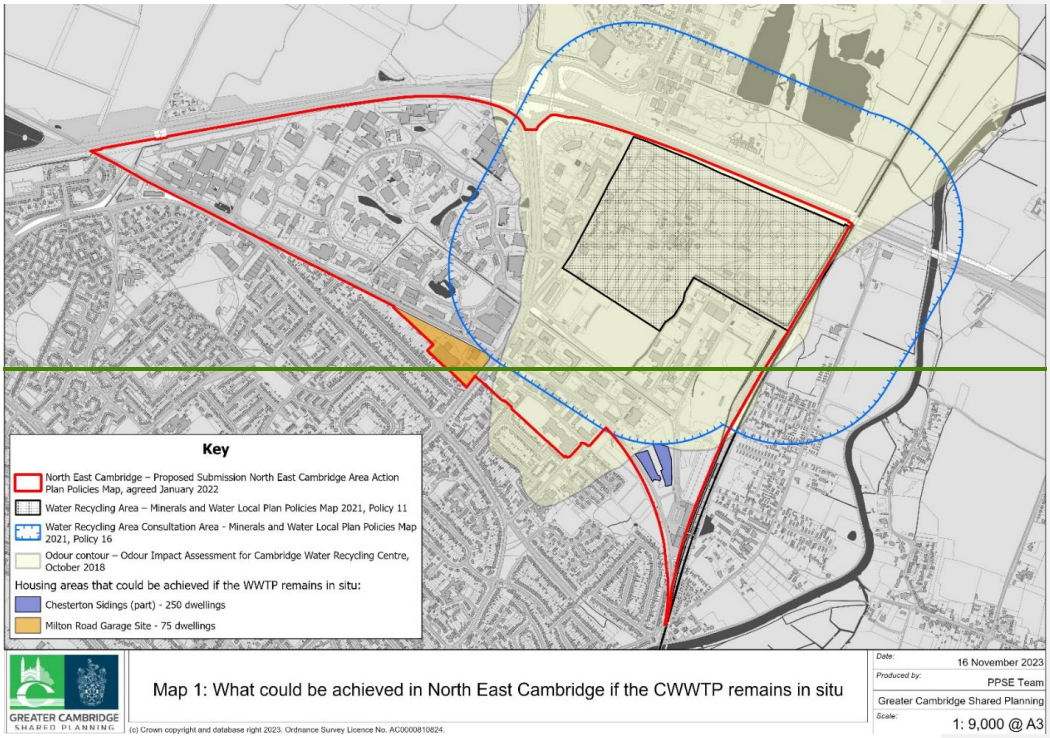
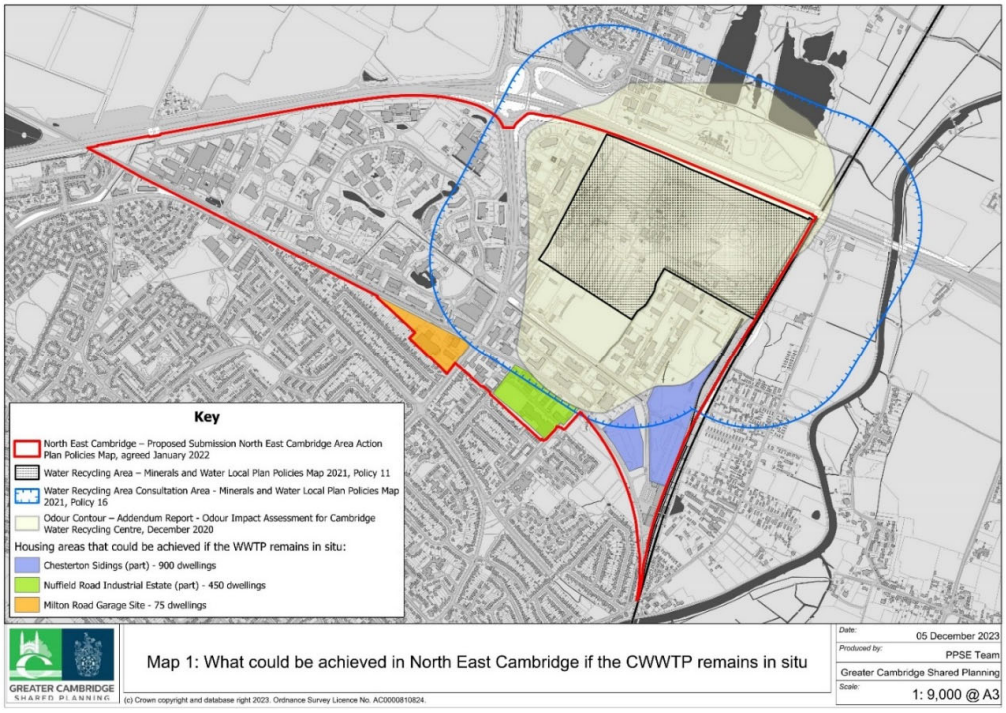
6.35 Only ~~two~~ three land parcels providing for residential development in the NECAAP lie outside the odour contours using Figure 1~~0~~ from the 2020 updated Odour impact assessment as the ~~best~~ worst-case scenario for what could take place with the CWWTP remaining in situ. The ~~two~~ three sites are: the car sales garage on Milton Road, which is already allocated in the Cambridge Local Plan (Policy M1, **Appendix 1, GCSP-3**) for 75 dwellings, so is included in current housing supply; ~~and~~ the Nuffield Road Industrial Estate, which is allocated for 450 homes, and the railway sidings adjoining the Cambridge North Station. This sidings site is allocated for 1,250 dwellings within the NECAAP, but ~~only 250~~ 900 dwellings would currently lie outside the odour contours. It should also be noted that the redevelopment of Nuffield Road Industrial Estate relies on decanting industrial floorspace to Cowley Road industrial Estate to ensure no net loss in existing industrial floorspace within NEC. If Cowley Road Industrial Estate was unable to come forward – due to odour impacts as part of a mixed use area with enabling residential uses, it is unlikely that the full extent of residential proposed for the Nuffield Road Industrial Estate would be realised. ~~-~~As has been made clear in the Proposed Submission NECAAP, the deliverability of the NEC area and the indicative capacities for development are contingent on the DCO being granted. The constraints and the ~~two~~ three parcels where housing could come forward outside the odour contours, totalling ~~325~~ 1,425 dwellings, are shown on Map 1 below. Please note this map is also appended to the SCDC Responses to The Examining Authority's written questions and requests for information (ExQ1) [doc ref SCDC_ ExQ1_D1_20.11.23_v1, Appendix 3]


Key
North East Cambridge – Proposed Submission North East Cambridge Area Action Plan Policies Map, agreed January 2022
Water Recycling Area – Minerals and Water Local Plan Policies Map 2021, Policy 11
Water Recycling Area Consultation Area - Minerals and Water Local Plan Policies Map 2021, Policy 16
Odour contour – Odour Impact Assessment for Cambridge Water Recycling Centre, October 2018
Housing areas that could be achieved if the WWTP remains in situ:
Chesterton Sidings (part) - 250 dwellings
Milton Road Garage Site - 75 dwellings
GREATER CAMBRIDGE SHARED PLANNING
(c) Crown copyright and database right 2023. Ordnance Survey Licence No. AC0000810824.
Map 1: What could be achieved in North East Cambridge if the CWWTP remains in situ
Date: 16 November 2023
Produced by: PPSE Team
Greater Cambridge Shared Planning
Scale: 1: 9,000 @ A3



6.36 The HIF award provides evidence that the relocation of the CWWTP is now viable. The DCO, if and when approved, would provide evidence that the CWWTP can relocate to an alternative site and that redevelopment of the NEC area is deliverable. The NECAAP process has therefore advanced as far as it can at this point and has been paused until such time as the DCO process is concluded.

Relevance of CPO to delivery of any land facilitated by the relocation of the ReWWTP and how sits in timetable to achieve the required start of site of March 2028

6.37 The Examining Authority has specifically raised the issue of progress of land assembly and necessity for land acquisition in respect of the future development of the North East Cambridge area.

6.38 The land ownership in the NEC area is shown on Figure 6 of the Proposed Submission NECAAP **[Appendix 1, GCSP-7)**. Of the total 8,350 new homes proposed by the draft NECAAP, 5,500 homes are to be accommodated on the existing CWWTP site and neighbouring City

Council owned land (shown together as Plot E on Figure 6). Neither site requires land assembly to enable redevelopment.

6.39 Of the 2,850 homes remaining, there are two areas where 975 homes are proposed to be located where it is possible that CPO powers could be needed to be utilised if agreement cannot be reached:

- Cowley Road Industrial Estate – 450 homes
- Employment sites south of the Cambridgeshire Guided Busway either side of Milton Road – 525 homes

6.40 The Cowley Road Industrial Estate is identified for 450 new homes and is located directly south of the existing CWWTP and is heavily constrained by the existing odour emissions from the CWWTP operation. The industrial estate occupies a total area of 6.76ha, comprising of circa 24 individual land parcels of varying sizes. Current occupiers include Veolia's Recycling Centre and Stagecoach's bus depot.

6.41 The draft NEC AAP promotes the Cowley Road Industrial Estate for mixed use redevelopment, providing for the replacement and intensification of the same amount of industrial use and floorspace in the area immediately adjacent to the aggregate's railhead, with light industrial, office and residential provision in the areas further removed from the aggregate's operation.

6.42 Due to the fragmented land ownership, existing lease arrangements, and likely need to relocate existing businesses to facilitate redevelopment, only 100 homes are proposed to come forward within the plan period to 2041 on Cowley Road Industrial Estate. The majority of the smaller land plots are in the ownership of the City Council and can be assembled to optimise the development opportunity. The other plots are reasonably large and can come forward as individual redevelopment proposals. To support such a proposition, the Councils have prepared a Commercial Advice and Relocation Strategy (December 2021) **[Appendix 1, GCSP-21]** to further inform the delivery assumptions underpinning the provision of mixed-use redevelopment of these existing industrial sites. As such, it is anticipated that land assembly requiring compulsory acquisition could be required to deliver the housing allocation provided for on the Cowley Road Industrial Estate.

6.43 The employment sites south of the Cambridgeshire Guided Busway on either side of Milton Road are identified for 525 homes. The car sales garage on Milton Road, identified as Plot H within Figure 6 of the

NECAAP **[Appendix 1, GCSP-7]**, is already allocated in the Cambridge Local Plan [Policy M1, **Appendix 1, GCSP-4]** for housing. This site is now in single private ownership with a willing landowner (Brockton Everlast) who is actively seeking to bring forward this site for redevelopment. As stated previously, this site is not constrained by odour extents from the existing CWWTP operation and is allocated for 75 dwellings within the NECAAP.

6.44 The same developer has also acquired the site directly opposite on the eastern side of Milton Road, known as Trinity Hall Farm Industrial Estate (shown as Plot I on Figure 6 of the NECAAP **[Appendix 1, GCSP-7]**. This site is proposed to be retained for employment uses, with both the landowner and Councils seeking intensification of commercial floorspace through redevelopment.

6.45 The Nuffield Road Industrial Estate, identified as Plot K on Figure 6 of the NECAAP **[Appendix 1, GCSP-7)**, is proposed to transition from industrial to residential use, making provision for 450 dwellings. Plot K occupies a land area of 4.16ha comprising of circa 9 individual land parcels of varying sizes. The ~~entire~~ area is ~~currently~~ partially constrained by the odour extents from the existing CWWTP operation, which would likely prevent comprehensive redevelopment for residential use if the existing CWWTP remains in situ. As such, the NECAAP **[Appendix 1, GCSP-7**, Figure 45**]** anticipates only a modest provision of 150 dwellings to come forward across the Nuffield Road Industrial Estate over the plan period to 2041.

6.46 While each of the individual land parcels within the Nuffield Road Industrial Estate is capable of being brought forward for redevelopment on their own, there are likely to benefits, in terms of layout and optimising the development opportunity, if sites were assembled. To this end, the City Council is a major landowner within the estate and has, through its 'in-principle' agreement (see Paragraph 6.48 below) indicated a willingness, through disposal or acquisition (including use of CPO), to facilitate the redevelopment opportunity of the Nuffield Road Industrial Estate being realised. The grant of the DCO and the relocation of the CWWTP will remove the existing odour constraint, and the regeneration of the wider NEC area is likely to provide the further catalyst needed to accelerate the market and will have the effect of bringing forward the Nuffield Road Industrial Estate for redevelopment.

6.47 With respect to the remaining 1,875 homes, these are allocated through the NECAAP [Appendix 1. 7 Figure 45) to strategic land parcels that are

in single ownership that already have willing landowners active in bringing forward their sites for redevelopment. No land assembly is required for any of these strategic sites to realise housing delivery.

6.48 As part of demonstrating the deliverability of the Proposed Submission NECAAP, while there is limited expectation that the Councils would need to use their CPO powers to facilitate the delivery of new housing across NEC, both have already formally given their in-principle commitment to the delivery of the NEC AAP. A mirror report to both Councils in October 2021 secured agreement to the principle of disposal, acquisition, and assembly of land if required and necessary to facilitate the delivery of the spatial strategy for the NEC area, including the use of CPO powers (see South Cambridgeshire District Council's Cabinet 19 October 2021 **[Appendix 1, GCSP-37]** and Cambridge City Council's Strategy and Resources Committee 11 October 2021 **[Appendix 1, GCSP-36]**. The in-principle agreement was considered appropriate to help mitigate delivery risks and to give confidence to the market that the Councils would actively intervene if required.

6.49 In summary, having regard to the above, the Councils are confident that any land assembly required, including compulsory purchase, will not be an impediment to the delivery of housing within the North East Cambridge area facilitated by the relocation of the existing CWWTP.

Greater Cambridge Local Plan

6.50 Alongside the preparation of the NECAAP, the Councils are preparing a new joint Local Plan for their combined areas looking to the period 2041. The emerging Greater Cambridge Local Plan ('the GCLP') incorporates the proposals contained in the NECAAP through the proposed allocation of North East Cambridge within the spatial strategy for Greater Cambridge (proposed Policy S/NEC) **[Appendix 1, GCSP-5 and Appendix 1, GCSP-5a],** having tested the merits of the location as part of the process of identifying the preferred development strategy. The emerging GCLP and its supporting evidence show the highly sustainable locational merits of the NEC area for a new residential-led City district. The area proposed to be allocated in the emerging Greater Cambridge Local Plan is the same as that covered by the NECAAP.

First Proposals (Preferred Options, Regulation 18)

6.51 The emerging joint Greater Cambridge Local Plan has been the subject of two Regulation 18 (of the Town and Country Planning (Local Planning)

(England) Regulations 2012) consultations, most recently the First Proposals (Preferred Options) in November 2021 **[Appendix 1, GCSP-5]**. The First Proposals set out the proposed policy direction for Policy S/DS: Development Strategy **[Appendix 1, GCSP-5a -** page 29**]**, that identified the sites and number of homes that would be delivered to meet the identified need for new homes to support forecast jobs to 2041. To meet the identified objectively assessed need for homes within Greater Cambridge for the plan period 2020-2041, the additional number of homes required, accounting for existing housing commitments and a 10%, was 11,640 homes. Within this provision, North East Cambridge was identified as capable of contributing 3,900 of a total of 8,350 homes within the plan period. The supporting text made clear that the process for considering the relocation of the CWWTP is a separate process to the Local Plan that would enable the NEC area to be unlocked for comprehensive development and the allocation of NEC is predicated on the relocation of the CWWTP **[Appendix 1, GCSP-5 -** pages 17, 56, and 57**]**.

Strategic Options and Alternatives to the inclusion of North East Cambridge, including consideration of carbon emissions and Green Belt during strategic housing site selection

6.52 The preparation of the emerging GCLP did not simply take the NECAAP proposals and include them in the Local Plan. Even though the site is identified in the adopted 2018 Local Plans as an area having potential for development, those plans do not rely on any development quantum coming from North East Cambridge, given the uncertainty at that point in the future availability of the existing CWWTP site and uses that might be appropriate and whether they were deliverable. The work on the new Local Plan looked afresh at the strategic spatial options available for development in Greater Cambridge and assessed the benefits and disbenefits of those spatial locations. The outcome of that assessment is an important part of understanding why the Councils place such significance on the planning benefits of the NEC site in the development strategy for the emerging Local Plan.

6.53 A number of development quantum and spatial options were tested at each stage of the plan making process so far, to ensure that all reasonable strategic spatial options were tested and considered and that an understanding of the different impacts and implications informed the choice of the preferred development strategy for Greater Cambridge. Spatial options included:

- Densification of existing urban areas
- Edge of Cambridge: Non-Green Belt
- Edge of Cambridge: Green Belt
- Dispersal: New settlements (previously established and entirely new)
- Dispersal: villages
- Public Transport Corridors
- Supporting a high-tech corridor by integrating jobs and homes (focusing homes within the Rural Southern Cluster which is home to a significant cluster of high tech and life science businesses
- Expanding a growth area around transport nodes (focus on A428 corridor – location of proposed East West Rail and rapid transit bus route)

6.54 As noted above, the North East Cambridge site, within which the CWWTP lies, is the last remaining strategic scale brownfield site within the urban area of Cambridge, and therefore the only opportunity to provide significant housing in the urban area of Cambridge that has long been recognised as the most sustainable location for development in the Cambridge area and the evidence supporting the GCLP confirms this is still the case as set out below.

6.55 The only potential development site on the Edge of Cambridge that is not in the Green Belt is Cambridge Airport, which was released from the Green Belt in a previous round of plan making when the other urban extensions to Cambridge were allocated. The Cambridge Airport site was safeguarded in the adopted Local Plans 2018 **[Appendix 1, nos.1 and 3]** as it was still in operation and Marshall has advised that the site was not available at that time. More recently, Marshall has advised that it intends to bring forward the Airfield site for development and has recently secured planning permission in October 2023 to relocate its aircraft operations to Cranfield Airport.

6.56 Testing of the strategic spatial options looked through the lens of the key themes identified for the new Local Plan, which are:

- Climate Change
- Biodiversity and Green Spaces
- Wellbeing and Social Inclusion
- Great Places
- Homes
- Jobs
- Infrastructure

6.57 Testing included assessments by consultants advising the Councils on a number of the themes. Of particular relevance to the consideration of spatial choices were three assessments where the location of development made a difference to the impact development would have on the theme in question. These are:

- Climate Change evidence
- Transport evidence
- Sustainability Appraisal

6.58 A critical finding of the assessments carried out by the Councils' Climate Change consultants, Strategic spatial options appraisal: implications for carbon emissions **[Appendix 1, GCSP-23]** relevant to determining the First Proposals development strategy, was that "Transport emissions are the deciding factor in the carbon differences between spatial options. These are harder to deal with purely via policies within the Local Plan and are most strongly affected by where development takes place" (page 24, second paragraph). This reflects that whilst development can be built to high carbon standards wherever it is, the impact that travel by private car has on emissions is down to location. The Transport evidence **[Appendix 1, GCSP-26]** (regarding the strategic options and reinforced by testing of the emerging preferred option) helped the Councils to understand how different spatial locations impact on use of the car in terms of mode share and also total travel distance by private car. The Sustainability Appraisal Plan Strategic Spatial Options Assessment **[Appendix 1, GCSP-24]** considered the implications of the different strategic spatial options tested, and later the preferred options.

6.59 At the strategic options stage, headline findings from these studies, as captured in the Development Strategy Options – Summary Report 2020 **[Appendix 1, GCSP-22** - section 6.2, page 66**]** identified that Option 1 – Densification of existing urban areas (which included North East Cambridge as its primary location for development) was the best of all options with regard to minimising carbon emissions, had the highest level of active travel and lowest car mode share, and performed well in the Sustainability Appraisal 2020 **[Appendix 1, GCSP-24** - page 146**)**, as a highly sustainable broad location for additional homes and jobs, relating to its accessibility to existing jobs and services. The findings of these assessments were considered and analysed in the Development Strategy Topic Paper 2021 **[Appendix 1, GCSP-25]** to inform the preferred strategy.

6.60 To provide a clear and consistent way of selecting the sites to be included in the Preferred Options, guiding principles were identified:

"The proposed development strategy is to direct development to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live, whilst ensuring all necessary utilities can be provided in a sustainable way. It also seeks to be realistic around the locational limits of some new jobs floorspace which is centred upon national and global economic clusters".

6.61 In light of the analysis undertaken, the First Proposals 2021 (Preferred Options) included a blended development strategy that focuses growth at a range of the best performing locations in terms of minimising trips by car. With respect to North East Cambridge, the transport evidence **[Appendix 1, GCSP-26** - section 14.3 and Table 13] demonstrated that North East Cambridge is the best performing new strategic scale location for provision of new development within Greater Cambridge. More widely, the Sustainability Appraisal Non-Technical Summary 2021 supporting the First Proposals identified that the S/NEC: North East Cambridge policy would have positive effects for 11 out of the 15 Local Plan SA objectives **[Appendix 1, GCSP-27** – Table 12: Summary of SA effects for preferred policy approaches].

6.62 The Councils' position in the First Proposals is that they do not consider that housing needs alone provide the 'exceptional circumstances' required in national policy to justify removing land from the Green Belt on the edge of Cambridge in the emerging Local Plan, having regard to the identification of the proposed emerging strategy that can meet needs in a sustainable way without the need for Green Belt release. This emerging strategy includes identification of Cambourne for a strategic scale expansion in recognition of East West Rail and a proposed station at the previously established new town. As such, within the First Proposals, sites on the edge of Cambridge in the Green Belt were considered individually in order to assess whether there could be any site-specific exceptional circumstances that could justify release of land from the Green Belt. In all but one case, the Councils have concluded that no such exceptional circumstances exist. The only specific site identified where there may be a case for exceptional circumstances to remove land from the Green Belt is at the Cambridge Biomedical Campus, based on Addenbrookes Hospital and a major location for life sciences, in order to allow this unique international campus to continue to grow.

6.63 The First Proposals were subject to public consultation in late 2021 and the results of the consultation have been published on the Greater Cambridge Shared Planning website.

Implications of Water Supply, including for Plan timetables

6.64 A key issue identified in the Greater Cambridge Integrated Water Management Study 2021 **[Appendix 1, GCSP-31]** is the need for new strategic water supply infrastructure to provide for longer term needs, and to protect the integrity of the chalk aquifer south of Cambridge. Our draft Sustainability Appraisal in respect of the emerging GCLP **[Appendix 1, GCSP-27**, page 14] also identifies significant environmental impacts if the issue of water supply is not resolved. The First Proposals were clear that if it is concluded that it is not possible to demonstrate an adequate supply of water without unacceptable environmental harm to support development ahead of strategic water infrastructure being in place, there may be a need for the plan to include policies to phase delivery of development and need for jobs and homes may not be able to be met in full in the plan period.

6.65 Cambridge Water's emerging Water Resources Management Plan ('WRMP') **[Appendix 1, GCSP-32)** is an important part of the emerging local plan process as it will provide clarity about available water supply during the new plan period to 2041 and beyond. There is a serious issue of a sustainable water supply in Greater Cambridge, particularly ahead of proposed significant infrastructure improvements in the form of a bulk water transfer from Anglian Water's area and a new Fens Reservoir expected around 2035-37. Since the understanding in the Development Strategy Update in early 2023, the revised WRMP published in September 2023 identifies a supply transfer starting at 2032 rather than 2030, but this a larger transfer than previously envisaged.

6.66 The revised draft WRMP indicates that, at current growth assumptions, the demand for water between the years 2030 – 2032 will create the greatest risk to water bodies. Until there is greater clarity on anticipated available water supply at different points in the Local Plan period to 2041 and the development levels it will support, it is not possible to take the emerging Local Plan forward to the draft plan stage.

6.67 The Environment Agency raised concerns about Cambridge Water's draft WRMP when it was published in February 2023, later than the anticipated Autumn 2022 date. Cambridge Water published its response to the

consultation responses it received and also an updated draft WRMP in October 2023. The Councils are continuing to engage with Cambridge Water and the Environment Agency to seek to understand the implications for the emerging GCLP. The Environment Agency has a statutory 10 week period in which to respond to the latest proposals, following which it will be for DEFRA to make a decision whether the WRMP is ready to be confirmed or whether further work is required.

6.68 Whilst there remains uncertainty over the ultimate level of development that can be served with a sustainable water supply, it is anticipated that there should be a conclusion to the WRMP around the end of 2023. If there is a further delay, it is considered that a resolution is likely to be achieved by the end of the DCO examination process.

6.69 Reference is made in the DCO application [para 1.1.5 Planning Statement Doc ref.7.5] [APP 204] to a further Regulation 18 consultation on a Preferred Options draft of the GCLP taking place in Autumn 2023. The District Council notes that this reflects the timetable within the adopted Local Development Scheme (LDS) 2022. However, both the District Council and Cambridge City Council have made public the need to update the LDS to take account of the latest timetable for the CWWTP DCO process and also, in particular, to delays to Cambridge Water's Water Resources Management Plan ('WRMP').

6.70 The Greater Cambridge Shared Planning Website **[Appendix 1, GCSP-9 -** see "what happens next] on makes clear that the LDS will need to be updated and that a report dealing with a review of the LDS will be brought to Members only once we have greater clarity on water supply. This is reflected in each Council's Forward Plan of meetings.

6.71 Whilst there are delays to the emerging Local Plan process, it is not anticipated that the water supply situation would delay taking forward the Proposed Submission NECAAP following the conclusion of the DCO process as set out above.

Development Strategy Update

6.72 Whilst it has not been possible to prepare a draft Local Plan at this stage, a Development Strategy Update **[Appendix 1, GCSP-6]** for the emerging Greater Cambridge Local Plan has been prepared and was agreed by South Cambridgeshire District Council's Cabinet meeting on 6 February 2023 **[Appendix 1, GCSP-39]** and Cambridge City Council's Planning and Transport Scrutiny Committee on 17 January 2023 **[Appendix 1,**

GCSP-38]. The Development Strategy Update included new evidence reviewing the level of need for jobs and homes that supported the First Proposals (Preferred Options Regulation 18) consultation **[Appendix 1, GCSP-5].** Taking account of latest information on the continued strength of the key sectors in Greater Cambridge, including high technology and life sciences, the Development Strategy Update sets out that the forecast of jobs growth shows an increase in need for jobs for the period 2020 to 2041 with need increasing from 58,400 to 66,600 jobs. The total need for homes in the period 2020 to 2041 has increased from 44,400 to 51,723 homes (the methodology includes the homes needed to support those jobs beyond the 43,300 jobs supported by the standard method number of 37,149 homes) **[Appendix 1, GCSP-5 -** Development Strategy Update, Section 2].

6.73 Given the uncertainty over water supply, and also evidence indicating that it may or may not be possible to deliver the increased needs in full depending on market absorption rates and the preferred strategy, it is not possible at this point to set a definitive housing target for the new Local Plan and therefore it would be premature to identify any additional sites that may or may not be necessary to meet the increased need, or indeed to take account of any sites included in the First Proposals that may not be able to come forward, including North East Cambridge were the DCO not to be approved.

6.74 However, what we do understand already is that once the reservoir is operational from around the mid-2030s there will be substantial water supply available. The process for bringing forward the new Fens Reservoir is already progressing and given the significance of the proposal to the future water security of the Region, there is considered to be a reasonable prospect that it will be delivered and therefore we can be confident that whatever decision is made for the plan period as a whole, we will be able to plan for further development being completed from the opening of the reservoir in 2035-37. It is the interim period that remains uncertain at this point, although it is expected that the proposed water transfer measures will increase supply from around 2030. Once Cambridge Water's draft Water Resource Management Plan is published, an update to the Councils' Water Cycle Strategy will be prepared and will inform preparation of the draft Local Plan (see Development Strategy Update paragraph 3.15).

6.75 In this context and through the Development Strategy Update **[Appendix 1, GCSP-6]**, the Councils confirmed that three key sites, including North East Cambridge ('NEC'), should form central building blocks of any future

strategy for development for Greater Cambridge, and that as such they should be confirmed for inclusion within the emerging Greater Cambridge Local Plan ('GCLP') strategy. The Development Strategy Update report **[Appendix 1, GCSP-6** – paragraphs 4.3 and 4.3.1] concluded that this brownfield site within the urban area of Cambridge is identified in the First Proposals strategy as the most sustainable location for strategic scale development available within Greater Cambridge. It also confirms that no new evidence since the 2021 First Proposals consultation nor any matters raised in representations received have changed the Councils' position that North East Cambridge makes the best use of land by placing homes, jobs and other supporting services and facilities within the existing urban area of Cambridge. The Councils recognise that their decision to agree the Development Strategy Update has an interdependence with, and will inform, the Development Consent Order process being undertaken by Anglian Water, which in turn will form a critical part of the evidence supporting the Local Plan as it progresses to the proposed submission stage.

6.76 The Development Strategy Update report [**Appendix 1, 6 -** paragraph 5.4] confirmed that the guiding principles that informed the selection of the First Proposals preferred options remain valid and appropriate for considering any further sites it may be necessary to identify to meet needs for jobs and homes.

6.77 In summary, the proposed policy direction confirmed by the Councils in the Development Strategy Update **[Appendix 1, GCSP-6)** is that the new GCLP should include and prioritise delivery of North East Cambridge as an important part of the development strategy to deliver an inclusive, walkable, low carbon new city district. The proposed approach in the emerging GCLP is predicated on the relocation of the CWWTP taking place. However, the locational merits of the existing CWWTP site are clear from the evidence base supporting the emerging GCLP. The Development Strategy Update document makes clear that this brownfield site within the urban area of Cambridge is the most sustainable location for strategic scale development available within Greater Cambridge **[Appendix 1, GCSP-6** – paragraph 4.3.1).

Extent to which housing needs could be met without the relocation of the CWWTP

6.78 If the DCO were not approved or if for any other reason the release of CWWTP does not occur, this would mean that the long-sought regeneration of North East Cambridge would remain undeliverable and

the local plans would be further delayed. The Councils would therefore necessarily have to go back through the process of considering the available broad locations for development that performed next best against the guiding principles.

6.79 There would be a need to identify and allocate other strategic scale site(s) within Greater Cambridge to meet the area's need for housing and employment, so far as is possible within infrastructure constraints, including water supply and housing deliverability considerations.

6.80 In terms of alternative strategic scale options, as in previous plan preparation, this focuses on the 'Edge of Cambridge in the Green Belt' location and 'New Settlements with high quality public transport connections to Cambridge' location. This would involve considering which locations and strategic sites would be the next best fit with the guiding principles:

- Edge of Cambridge – Green Belt: strategic spatial options evidence **[Appendix 1, GCSP-22** – Development Strategy Options Summary Report, section 6.4) identified that sites in the Green Belt could provide a sustainable location for homes and jobs in terms of transport and carbon impacts particularly being accessible to existing jobs and services. However, it should be noted that providing transport mitigation for such sites may be more challenging than for North East Cambridge, noting that this site already benefits from significant levels of existing and planned HQPT and Active Travel provision **[Appendix 1, GCSP-23,** paragraphs 5.5.7-5.5.8]. Use of greenfield land on the edge of the Cambridge could result in landscape changes that would alter the setting of the city, particularly in relation to the historic core, and could affect views in and out of the city and would also be likely to affect the setting of the historic city, a key purpose of the Cambridge Green Belt [**Appendix 1, GCSP-21** - Development Strategy Options Summary Report, Section 6.4]. At the First Proposals stage, consideration of alternatives noted that sites on the edge of Cambridge in the Green Belt would have significant adverse Green Belt impacts **[Appendix 1, GCSP-25** - Development Strategy Topic Paper, Part 1, section 7.6 and Appendix 1D].

- New settlements: evidence and the Sustainability Appraisal supporting the First Proposals **[Appendix 1, GCSP-27** - section 6.78] demonstrated that: in principle, new settlements located on public transport corridors can be sustainable locations for development; they are reliant on significant infrastructure investment, and as a result may

take a significant time to start being developed; the most sustainable location for further new settlement scale development is through an expansion of Cambourne; focusing further growth on this previously established settlement is substantively more sustainable than allocating a 'new' new settlement in a brand new location. As such, any additional new settlement identified to meet needs would likely be less sustainable in transport terms than Cambourne and would likely take a significant time to deliver.

6.81 In conclusion, on the basis of the evidence available to the District Council at this time, the alternative locations to North East Cambridge that could be available to meet the Councils development needs are all less sustainable in transport terms and the carbon emissions arising. In addition, it is clear that the Edge of Cambridge Green Belt sites would have a significant impact on the Green Belt, and the New Settlement options would be likely to take a significant time to deliver.

6.82 To be clear, it is not the Councils' position that active alternatives to the North East Cambridge scheme have been or are being identified. It is merely that the fact that the release of the CWWTP cannot even be assumed as the basis for a deliverable plan or plan policy until Anglian Water has the means to relocate. The available evidence also shows that the NEC area is the clear preferred option in terms of location for strategic scale growth, which the NECAAP demonstrates is considerable, and given that the HIF funding addresses the viability constraint that has long prevented the delivery of regeneration of this highly sustainable site, there is no justification to consider alternative options, beyond the process that informed the GCLP Preferred Options, until the outcome of the DCO is known.

Progressing the emerging Development Plans

6.83 There are a range of factors that are important to the process and timescales for taking forward the emerging development plans.

Housing Trajectory on the CWWTP site in the emerging NECAAP and Local Plan

6.84 The housing trajectory in the Proposed Submission draft of the NECAAP indicates 1,900 homes coming forward on the Anglian Water and City Council owned land over the plan period 2020 – 2041, out of a total of 5,500 homes **[Appendix 1, GCSP-7** - page 271, Figure 45] of the 1,900

homes, 400 are anticipated to be delivered between 2030 and 2035, and a further 1,500 homes between 2035 and 2041. This is an average of 300 units being delivered per annum on strategic development land and represents a conservative estimate of potential build out rates, noting that conditions attached to the HIF funding will likely seek an accelerated build out. The Housing Delivery Study 2021 evidence supporting the GCLP First Proposals **[Appendix 1, GCSP-28** - para. 6.15] endorses this assertion, concluding that a reasonable average rate for the middle years of delivering strategic scale sites within or on the edge of Cambridge would be 350 dwellings per annum, and 300 per annum on new settlements away from Cambridge. These recommendations are confirmed in a Housing Delivery Study Addendum 2022 **[Appendix 1, GCSP-29** – page 32**)** supporting the GCLP Development Strategy Update, having considered representations made during consultation on the First Proposals. It recommends a typical build up on units over the first three years. It may be appropriate to make some modest amendments to the trajectory in the NECAAP and GCLP, but the timing currently included is likely to broadly fit with the increase in water supply and, for NEC, the removal of the odour constraint. The trajectory is not a ceiling on delivery rates and if circumstances allow, build out rates could be higher.

6.85 It is expected that the City Council owned land would be developed out first, as this currently comprises the City Council depot and a golf driving range. As set out in the NEC Typologies Study and Development Capacity Assessment (December 2021) **[Appendix 1, GCSP- 19]**, this area totals circa 7.95ha and could accommodate 1,800 net new homes, as well as significant commercial and community floorspace associated with the establishment of the proposed new district town centre.

6.86 There are limited development constraints to bringing forward the City Council owned parcels of land. Buildings are limited in number and scale and are of generally poor quality. Any tenancies that exist have been managed. A planning application is understood to be imminent to relocate the depot operations to City Council owned land at the Cowley Road Industrial Estate. The site fronts Cowley Road and is accessible via direct access from Cowley Road. As such, it is reasonable to conclude that this land is readily available for redevelopment for housing and other uses, subject to the removal of the existing odour constraint. If the DCO is approved and implemented, construction of housing on the City Council land could commence prior to the existing CWWTP being decommissioned. This would see the first housing enabled by the DCO being delivered by 2028 or even earlier.

6.87 Further, it is worth noting that the City Council owned land is proposed through the draft NECAAP to include the new district town centre serving the area. It is therefore expected that, alongside the delivery of new housing, development on this site would also secure the early delivery of local amenities and services to support the establishment of the new residential community.

6.88 The housing trajectory in the emerging GCLP follows the approach in the NECAAP and is set out in the Greater Cambridge Housing Trajectory included in the Development Strategy Topic Paper 2021 as one of the proposed additional sites in the new Local Plan **[Appendix 1, GCSP-25 -** page 83]. The trajectory shows first completions taking place in 2026/27 building up gradually to 350 homes per annum in 2033/34 and continuing to the end of the plan period in 2041 giving a total of 3,900 homes in the plan period.

6.89 The Development Strategy Topic Paper Proposed Policy Direction and Reasons for North East Cambridge [**Appendix 1, GCSP-25** - starting on page 99) sets out the assumptions informing the delivery of development in the trajectory (on page 101) as there being potential for early delivery from some of Chesterton Sidings parcel in 2026/2027 to 2029/2030 as pre-application discussions were already in progress. This was stated to be without prejudice to the outcome of any planning application process, which has recently been subject to a planning inquiry and the outcome is awaited. It assumes other parcels are anticipated to start delivering in 2030/2031 soon after the Waste Water Treatment Plant has been relocated, with build out rates based on Housing Delivery Study assumptions for urban extensions of gradual increase in annual completions to maximum of 350 dwellings a year [**Appendix 1, GCSP-28 - Table 19].** The assumptions underpinning the trajectory in the GCLP First Proposals will be kept under review as the plan progresses, but it remains the Councils' view that a substantial amount of housing can be delivered on the NEC site to contribute to strategic housing needs to 2041 and beyond, if the DCO for the relocation of the CWWTP is approved.

Degree of certainty that the NECAAP and emerging Local Plan would be found sound and adopted and timescales for this

6.90 As stated previously, the draft NECAAP spatial strategy and proposals **[Appendix 1, GCSP-7]** are predicated on the DCO for the relocation of the existing CWWTP being granted and implemented. Should that be the

case, the Proposed Submission NECAAP has already been approved by both authorities and would be advanced, following a further health check, to publication and submission for examination.

6.91 Currently, there are objections to the principle of the draft NECAAP. However, these are concerned with the relocation of the existing CWWTP to the proposed Honey Hill site and, therein, the impact on Green Belt and carbon. If the DCO is granted, these objections would fall away.

6.92 There will of course be objections to specific policy requirements. Much work has already been undertaken to limit such objections through the establishment of representative forums and community engagement that have informed the final proposals and policies of the AAP. However, the independent examination process is the appropriate format through which to debate these concerns, and the Councils will be directed by the appointed Planning Inspector to make such changes as required to make the final NECAAP sound and capable of formal adoption.

6.93 The timing of likely adoption of the NECAAP will depend on the period for conclusion of the DCO and how long the Independent Examination takes. However, if these keep to recommended timetables, the NECAAP could be formally adopted by the authorities by late 2024.

6.94 There are however external circumstances that may impact the above assumptions, including proposed amendments to the Plan-making system as proposed through recent Government consultation associated with the Levelling Up and Regeneration Bill that would direct LPAs to prepare only one development plan document.

Degree of certainty for redevelopment of existing CWWTP site

6.95 Anglian Water and the City Council have appointed a master-developer to bring forward a planning application for redevelopment of the existing CWWTP site. Community engagement has been undertaken over the past two years by the master-developer to gather local views to inform the early consideration of scheme design.

6.96 The Greater Cambridge Shared Planning Service has recently commenced pre-application discussions with the master-developer team. A Planning Performance Agreement has been entered into with the aim of managing the development consent and ensuring that a subsequent planning application (likely to be a hybrid application) for the site,

including the adjoining City Council own land, can be supported by the LPA.

6.97 Members of both Councils have continued to reiterate their clear desire to see the regeneration of the NEC area. Planning applications for development within the NEC area would be determined by the Joint Development Control Committee ('the JDCC'). This Committee comprises members appointed by the City Council and SCDC with its remit being to exercise each of the Councils' powers and duties in relation to planning applications for major developments on the fringes of the city. Proposals coming forward within NEC that conform with the vision, strategic objectives, and policies set out in the current draft NECAAP would clearly be supportable by the JDCC in planning terms.

What could be achieved in North East Cambridge if the CWWTP remains in situ

6.98 Again, the above is a matter that has been raised specifically by the Examining Authority.

6.99 As detailed previously, the existing CWWTP constrains the types of development that would be considered acceptable in the surrounding area due to the odour impact emanating from the operation of the plant. Should the CWWTP remain in situ, this would limit development on the surrounding land affected by the odour extents to less sensitive uses such as industrial and, where a higher amenity can be achieved, office and other commercial uses. As a result, none of the residential development (c. 2,525 dwellings) proposed by the NECAAP for the sites surrounding the CWWTP could be delivered. Only sites located outside of the odour extents would be capable of supporting new residential development – this would amount to some 325 dwellings across NEC at most. However, in the absence of the regeneration of the wider NEC area and the provision of a higher quality environment, it is uncertain whether the landowners would continue to support residential development in favour of other more suitable uses such as office and lab space.

6.100 For completeness, in responding to the matter raised by the Examining Authority, the Chronology report **[Appendix 1, GCSP-18]** states that the option of consolidation of the CWWTP onto a smaller part of the existing site was considered by Anglian Water as part of the business case supporting the HIF bid. The assessment identified that consolidation via a new facility next to the current CWWTP would be a complex process and, if it could be achieved, would at best release only a limited amount of land

for redevelopment and appropriate uses would continue to be constrained to industrial or commercial uses by odour considerations. The assessment concluded that without the potential for housing, any redevelopment would not attract HIF type funding, and this would render the consolidation option unviable.

6.101 In summary, should the CWWTP remain in situ, the NEC area would likely benefit from further commercial development but of a lower quality and density than proposed through the NECAPP, recognising the surrounding context and the need to screen impacts from 'bad neighbour' operations. None of the wider regeneration benefits are likely to be realised, including those associated with breaking down the physical and social barriers with the surrounding residential neighbourhoods. Significantly, in the absence of new housing, North East Cambridge will continue to be a commuter destination, with consequential impacts for the wider Greater Cambridge transport network. Further, as set out above, if the CWWTP site is not released the Councils already know that they would have to try to identify alternative, less sustainable locations, for the provision of the required housing.

Relationship between the ReWWTP DCO and the emerging development plans

6.102 As noted earlier (see paragraph 2.2), planning for waste water under the Town and Country Planning Act 1990, is a matter for Cambridgeshire County Council as the Minerals and Waste local planning authority. The relocation of the CWWTP to a different site and the development of a new WWTP is outside the remit of the City and District councils and is to be addressed in policy terms through the Minerals and Waste Local Plan not the existing or indeed emerging GCLP and NECAAP.

6.103 In addition, it would not be a sound approach for the emerging GCLP or NECAAP to allocate the North East Cambridge site for development without evidence of the deliverability of the proposed redevelopment. That is, as history has shown and as a matter of common sense of course, not possible to show in the absence of the means to allow for the CWWTP to be released and which can only in turn occur if a new WWTP can be provided.

6.104 A plan that was dependent upon an allocation, which it was not possible to show is deliverable or alternatively sought to require the site occupant to leave, would ultimately not be found sound. As set out above, this is why the polices of the current local plan do not take that approach.

6.105 Both emerging plans are clear that they are predicated on the relocation of the CWWTP taking place. The CWWTP project is properly considered through the Sustainability Appraisal process and the assessment of the cumulative effects of the emerging plans with other plans and projects, including the DCO for the WWTP relocation (see section below). The NECAAP and the emerging GCLP cannot progress to the Regulation 19 Proposed Submission Draft stage consultation unless and until the DCO is approved, in order to provide evidence that the plan strategy can be delivered. As such there is an interdependence between the two processes notwithstanding that they properly follow their own separate legislative processes.

6.106 It is also important to be clear that there is also a close interdependence with the HIF. The City Council, as LPA, is not privy to the details of the contract or agreement with Homes England, other than it understands the drawdown of the grant is contingent upon the DCO being granted and housing being delivered on the CWWTP site. The HIF is however, fundamental in that it is the only means by which the viability constraint that has prohibited regeneration for over 20 years is capable of being overcome.

Weight to be given to emerging development plans and how the Examining Authority should avoid prejudicing the outcome of the emerging Local Plan and AAP examinations when attributing weight to those documents.

6.107 The NECAAP has been drafted to ensure a plan-led approach to regeneration of the area can be provided by the Councils should the DCO for relocation of the CWWTP be granted.

6.108 While the Councils appreciate that the Proposed Submission draft of the NECAAP carries 'limited' weight in the determination of new planning applications under the Town and Country Planning Act 1990 coming forward within the NEC area, the Councils are of the opinion that the draft NECAAP can be given considerable weight as a material consideration in respect of the DCO application. In particular, the draft AAP is being prepared in accordance with the adopted 2018 Local Plans policies, in that it establishes the "amount of development, site capacity, viability, timescales and phasing of development" as required of the preparation of an Area Action Plan for the site within the extant Local Plan policies. In this context, the AAP is less about the principle of redevelopment and more about consideration of the amount and type of development that

could be realised should relocation of the CWWTP take place. Such considerations are informed by evidence base studies, community engagement, and responses to consultation.

6.109 As addressed in sections above, the Councils have already given their in-principle commitment to delivery of the NECAAP and have approved the Regulation 19 version of the AAP as being sound and the plan that they would adopt if it were not for the requirement for independent examination. The Councils would therefore invite the Examining Authority to apply a high degree of certainty that, should the Secretary of State determine to grant the DCO application, the NEC AAP will be adopted and planning permissions granted for proposals that accord with the vision, strategic objectives and policies of the NECAAP.

6.110 With respect to the emerging GCLP, the evidence supporting the local plan considers the locational merits of the NEC area against all other reasonable options and concludes it is the most sustainable location in Greater Cambridge for housing and employment development (see section dealing with alternatives to NEC starting at paragraph 6.52). This reconfirms the long planning history setting out the suitability of the NEC area for development to meet the essential needs of the Cambridge area, including the adopted 2018 Local Plans allocation of the site and the requirement to prepare a joint Area Action Plan to set out the development potential for the area, having regard to further consideration whether the relocation of the CWWTP could now be viable and deliverable. The HIF confirms the viability and a successful DCO would confirm the deliverability of the regeneration proposals for NEC to provide a new high quality, sustainable city district to help meets the needs of the area for many years into the future. As for the NECAAP, the Councils are of the opinion that the emerging GCLP, and in particular the evidence supporting the plan, can be given considerable weight as a matter that is both important and relevant to the DCO application.

Significance of North East Cambridge to the Cambridge Economy

6.111 Greater Cambridge has a strong and nationally important economy. It is recognised as one of the most important research and innovation-led employment hubs for the UK. The evidence supporting the emerging GCLP concludes that the economy is forecast to continue growing strongly and that housing need to support the economy is well above the government minimum standard method.

6.112 The NECAAP and its supporting evidence demonstrate the significant development potential of the site. The provision of 8,350 net additional homes would make a substantial contribution towards meeting Greater Cambridge's housing needs to 2041 and well beyond and would support the continue economic growth of the area and Greater Cambridge. The location of the existing CWWTP and surrounding area is in a key strategic location adjacent to Cambridge Science Park, a leading location for the technology sector, one of the key sectors in the Cambridge economy. It is also particularly well served by public transport and active transport infrastructure. It provides the opportunity to create high quality, attractive links between the Science Park and the Cambridge North Station and maximise the benefits of the new station, which was intended to be a catalyst for regeneration of this highly sustainable location, but the benefits of improved accessibility have yet to be fully realised given the continued presence of the CWWTP.

Government's Cambridge 2040 initiative

6.113 On 24 July 2023 the Prime Minister and Secretary of State for The Department of Levelling Up, Housing and Communities (DLUHC) committed to a new era of regeneration, inner-city densification and housing delivery across the Country with an initial focus on Cambridge. The Secretary of State appointed of Peter Freeman to establish and Chair the "Cambridge Delivery Group" (CDG). The Cambridge Delivery Group is in the process of being established. Funding of £5m for the CDG and a further £3m to explore water scarcity issues in the area has been committed by the Government to the Cambridge project. Supported by DEFRA, Environment Agency, DLUHC and Homes England officers, the Local Authorities for the Greater Cambridge Area, including the Shared Planning Service, have begun engagement with Peter Freeman and the Cambridge 2040 project.

6.114 The Local Authorities have been encouraged to continue their work on developing the local plan for the area. Whilst the government's outlined ambitions (in the Secretary of State for levelling up, Housing and communities statement) are for continued and further growth in this area, the Local Authorities have no clear basis to conclude that the spatial development strategy that they have outlined to date is to be revoked or replaced. Instead, the Local Authority engagement has focused on a diagnosis of barriers to delivery of that strategy, focusing on matters such as water supply through the Cambridge Water Scarcity Group.

6.115 Indeed, in respect of North East Cambridge, the statement says that: "Cambridge City Council, Anglian Water, Land Securities PLC and Homes England will work together to accelerate the relocation of water treatment works in Northeast Cambridge (subject to planning permission), unlocking an entire new City quarter – delivering approaching 6,000 sustainable well-designed homes in thriving neighbourhoods – as well as schools, parks and over 1 million square feet of much needed commercial life science research space."

Summary of the Planning Benefits of DCO Proposal

6.116 As addressed in Section 6, there are substantial planning benefits that would arise as a consequence of the development proposal, benefits that have been identified for over 20 years in Regional, Structure and Local Plans, but that have not been able to be delivered due to viability constraints. The District Council considers the benefits that would arise to be as follows:

- The proposal will secure £227m in Government (HIF) funding to address the viability constraint to redevelopment of the existing CWWTP site.
- It will enable the comprehensive development of the wider NEC area, optimising the development potential and enable a significant amount of homes and jobs to be provided in a highly sustainable location with excellent public and active transport connections.
- The release of the existing CWWTP site for redevelopment will remove the existing constraints imposed by the Waste Water Treatment Safeguarding Area designation upon the site and surrounds in respect of any development on land within the odour contours around the existing CWWTP, which incorporates a substantial area of previously developed land.
- This in turn enables the future development of the wider NEC area, including the existing CWWTP site, which is identified through the evidence supporting the emerging joint Greater Cambridge Local Plan (Regulation 18) as the most sustainable location in Greater Cambridge for development.
- The release of the existing CWWTP site will underpin the delivery of 8,350 homes. This is demonstrated by the evidence in support of the Draft Proposed Submission NECAAP (Regulation 19) **[Appendix 1, GCSP-7]** which shows the potential for the existing CWWTP site, once vacated together with neighbouring City Council owned land to accommodate c.5,500 net new homes, and by removing

environmental constraints, to enable up to a further c.2,850 net new homes on surrounding sites.

- Enabling the NEC area to come forward will make a significant contribution to the substantial objectively assessed housing need in accordance with the NPPF of the Greater Cambridge area identified in the emerging Greater Cambridge Local Plan to 2040 and beyond **[Appendix 1, GCSP-5]**
- In addition to housing, the site also offers the opportunity to deliver further beneficial commercial floorspace and a range of town centre uses, as well as social and physical infrastructure that will support the area's continued growth as a strategically important economic driver for Greater Cambridge and create a vibrant new urban quarter to Cambridge.
- The delivery of a new water treatment infrastructure that delivers treatment to a higher standard with lower energy use and carbon emissions than the existing plant.
- Increased on-site storage of foul/untreated water during storm flows contributing positively to the improved resilience of the Water environment and rivers downstream to the foul water discharge point.

6.117 The District Council considers these benefits amount to economic, environmental and social benefits to the locality and the region that are substantial.

6.118 These benefits are also recognised at Government level through Home England's support through the grant of the HIF as well as reflected in the statement of 24 July 2023 by Government as set out in the Secretary of State for Levelling Up, Housing and Communities which referred specifically to "*ambitious plans*" for Cambridge to be *"supercharged as Europe's science capital"* and to "*support Cambridge"* through "*a vision for a new quarter of well-designed, sustainable and beautiful neighbourhoods for people to live in, work and study. A quarter with space for cutting-edge laboratories, commercial developments fully adapted to climate change and that is green, with life science facilities encircled by country parkland and woodland accessible to all who live in Cambridge"*

6.119 The HIF funding provides a once in a generation opportunity to address the viability issue that has prevented regeneration for decades. There is very little potential for regeneration of the CWWTP site and surrounding area of North East Cambridge Area without the relocation of the CWWTP. In contrast, there is considerable developer interest in all of the strategic sites across North East Cambridge. The extant development plans

allocate the site for comprehensive redevelopment to be brought forward via a joint Area Action Plan. The NECAAP has reached the Proposed Submission stage, but cannot progress any further unless and until there is an assurance that the CWWTP will relocate through an approved DCO (or other approval) in order to meet the soundness test at independent public examination. The same applies to the GCLP. The Councils consider that this does not diminish the level of support for and confidence in the redevelopment of the CWWTP site, such that the Examining Authority can have a significant level of confidence that the regeneration will take place if the DCO is granted.

7. TOPIC 2 - Carbon

Policy Context - Carbon

7.1 Policy 28 of the Cambridge City Local Plan requires that all development to take the available opportunities to integrate the principles of sustainable design and construction into the design of proposals. Development proposals should demonstrate good principles in respect of adaptation to climate change, carbon reduction, water management, site waste management and use of materials.

Carbon Impact Overview

7.2 The City Council is broadly satisfied with the approach to assessing carbon emissions as set out in the Carbon Chapter of the ES [Doc ref: 5.2.10] [APP-042] and the use of the Institute of Environmental Management and Assessment (IEMA) EIA Guide to Assessing Greenhouse Gas Emissions and their significance (2022).

7.3 The parameters of the assessment, including capital carbon from construction, transport of materials and construction works, emissions from land use change as well as the operation of the proposed ReWWTP are considered to be reasonable.

7.4 It is noted that only limited construction will be undertaken within Cambridge City, mostly associated with the vent shaft and waste transfer tunnel.

7.5 The combined construction, operational and decommissioning activities associated with the whole development, including development within South Cambridgeshire District at the ReWWTP site would generate in

excess of 104tCO2e over its lifetime [Doc ref: 5.2.10] [APP-042]. The net whole life emissions of the proposed development preferred option (DCO) would lead to an estimated -32,330tCO2e due to avoided emissions from export of gas to grid. The alternative proposed development using Combined Heat and Power (CHP) engines (DM0), is estimated to give net emissions of 71,480tCO2e, clearly demonstrating the carbon emissions benefits of the proposed development preferred option (DCO).

7.6 The City Council agrees with carbon emissions factors applied [Doc ref: 5.2.10] [APP-042]. There is a high level of uncertainty relating to future energy policy which affects the likely future baseline carbon intensity of national grid electricity and gas supplies.

7.7 As a result, this can impact the projected emissions avoided through the use of CHP and the export of biomethane to the grid. The City Council agrees with the Applicant's submission and considers it to be reasonable based upon current known data.

Construction

7.8 Only minimal emissions resulting from this phase are mainly associated with the following:

- Manufacture of raw materials
- Transport of materials to construction site
- Fuel used in construction – (Clarify is required on whether this includes construction staff travel to and from work).

7.9 The assessment gives the construction carbon emissions for the two proposed options:

- DM0 – Proposed development with CHP engines (aligning with baseline)
- DCO – Proposed development with biomethane production (preferred option)

Construction Positive Carbon Impacts

7.10 The City Council considers there not to be any known positive impacts associated with the construction period.

Construction Neutral Carbon Impacts

7.11 In respect of decommissioning, it is noted that the assessment [Doc ref: 5.2.10] [APP-042] only accounts for carbon emissions associated with vehicle movements in this section.

7.12 The City Council agrees with the methodology used and the reasoning given [Doc ref: 5.2.10] [APP-042] behind the exclusions of emissions from other decommissioning activities (accounted for as part of planning permission for development of existing CWWTP).

7.13 Vehicle movements account for approximately 13tCO2e in total and the City Council considers this to be a minor adverse impact, rather than a significant impact.

Construction Negative Carbon Impacts

7.14 The carbon emissions associated with the construction phase of the proposed development, which include the South Cambridgeshire works at the ReWWTP, equate to 50,790tCO2e under the preferred development (DCO) [Doc. Ref. 5.2.10 Table 4.1]. The assessment demonstrates that the proposed development represents around 0.1% of the total UK construction emissions of 45 Mtco2e.

7.15 The City Council considered this to be a ***moderate adverse impact*** of significant affect.

Construction Carbon Mitigation

7.16 The City Council notes that the assessment demonstrates that carbon emissions from construction activities can be reduced by 48% when comparing the DM0 baseline with the DCO preferred development. This is mainly achieved through a change in the sand filtration process and a reduction in the size of onsite facilities such as tanks, tunnels and roads, saving on the processing of raw materials [Doc ref: 5.2.10] [APP-042]. The Applicant has a target to achieve a 70% reduction, meaning a further 22% reduction, (equating to just over 21,000 tonnes of CO2e), is still required. Secondary mitigating measures have been identified, such as:

- Continued innovation review;
- Material specification, requiring low carbon intensity materials; and
- Efficient construction

7.17 It is noted that such savings will be achieved during the later design stages, and it is therefore important that a detailed Construction Environmental Management Plan (CEMP) [Appendix 2.1 Code of Construction Practice Part A CoCP Appendix 2.1 a [APP-068] is provided, and the whole life carbon assessment is updated as this detail becomes available.

Operational Carbon Impacts

7.18 The assessment [Doc ref: 5.2.10] [APP-042] gives the operational carbon emissions from year one of operation and gives figures for the two proposed options:

- DM0 – Proposed development with CHP engines (aligning with baseline)
- DCO – Proposed development with biomethane production (preferred option)

7.19 The City Council notes that the Carbon Chapter of the ES [Doc ref: 5.2.10] [APP-042] states that operational energy use covers routine maintenance activities and carbon emissions from capital replacements are included within the whole life carbon assessment. The City Council seeks further clarity on what the Applicant refers to as 'capital replacements', how carbon intensive they are likely to be and the frequency of their occurrence. In the event that these capital replacements are occurring during the operational phase, the City Council considers the rationale is for excluding these emissions from this phase should be provided particularly given the maintenance/upgrade of facilities required.

Operational Positive Carbon Impacts

7.20 The total gross emissions for both options are as follows:

- DM0 – 2,130 tCO2e/yr
- DCO – 2,730 tCO2e/yr (the 600t increase here is associated with the use of propane to allow for biomethane export)

7.21 The use of CHP engines in option DM0 would offset 1,030 tCO2e/year giving a net a carbon emission of 1,110 tCO2/yr. The preferred option (DCO) gives a negative net emission of 3,490 tCO2/yr. This is due to the

fact that the biomethane transfer to the gas grid would offset 6,210 tCO2/yr [Doc ref: 5.2.10] [APP-042]

7.22 In the context of the treatment of water as per the operational function of the proposed development, the City Council notes the average emissions per megalitre of water currently processed in existing facilities is 0.432tCO2 per megalitre. The DM0 option reduces this to 0.018 tCO2 per megalitre and DCO offers a further reduction, down to -0.055 tCO2 per megalitre [Doc ref: 5.2.10] [APP-042].

7.23 The City Council considers the operational impact of both options, DM0 and DCO, to have a moderate adverse impact, considered as significant, which remains unchanged for option DM0, even after the use of CHP to reduce emissions.

7.24 The export of biomethane used in preferred option DCO, gives the proposed development a beneficial, significant impact at operational stage.

7.25 The City Council notes that the Applicant will be planting a large area of deciduous woodland (although this will be within South Cambridgeshire District at the ReWWTP), that once established after year 11, should offer an additional 101tCO2e per year, which the City Council considered to have a significant positive impact.

Operational Neutral Carbon Impacts

7.26 The assessment as outlined in section two of the ES Carbon Chapter [Doc ref: 5.2.10] [APP-042] shows that the proposed development would not sequester as much carbon as the baseline due to the loss of arable land. This equates to approximately 8 tCO2e per year which City Council considers to be relatively insignificant.

Operational Negative Carbon Impacts

7.27 The operational impact of both options, DM0 and DCO, is a moderate adverse impact, considered as significant, which remains unchanged for option DM0, even after the use of CHP to reduce emissions.

7.28 The export of biomethane used in preferred option DCO, gives the proposed development a beneficial, significant impact at operational stage. The City Council considers that in the event that the export of

biomethane was unlikely to be a feasible option, and DM0 was the option progressed, the proposed development would give rise to annual net carbon emissions of 1,110tCO2e, which the City Council considers to lead to a moderately adverse and significant impact [Doc ref: 5.2.10] [APP-042].

Operational Carbon Mitigation

7.29 The City Council notes in Section 4 of the Carbon ES Chapter [doc ref: 5.2.10] [APP-042], the Applicant refers to further measures to improve energy efficiency and generate renewable energy being evaluated further at design stage. This includes the installation of a 7mW solar photovoltaic array.

7.30 The City Council considers it is essential to ensure that the provisions of the Development Consent Order (DCO) include allowance for a continual process of refinement of information and data to be provided to the City Council. As the development scheme moves towards detailed design, it is important in the City Council's view that the most accurate information should be made available to inform the development.

7.31 The City Council notes in Section 2.8 of the Carbon ES Chapter [doc ref: 5.2.10] [APP-042] that mitigation will be controlled through the DCO and that further carbon reductions will be achieved through later design stages and onsite construction activities (e.g., 22% shortfall in construction phase target). As this is a continually evolving area in relation to design, uncertainty in future energy policy and the impact on future carbon intensities, an outline of the timescales for monitoring, reviewing and updating the carbon emissions associated with this project should be required in the City Council's view in order to ensure the most accurate information is available to inform the development and ensure the scheme is meeting standards and targets in relation to carbon.

Requirements - Carbon

7.32 The following requirements should be considered as part of the DCO:

- Decommissioning of the ReWWTP has been excluded from the carbon assessment due to the long lifespan of the development. It is noted that there are no proposals for decommissioning before 2050 making attempts to quantify carbon emissions associated with this difficult. Although the City Council agrees that quantifying these

emissions would be a best estimation, the implications of decommissioning should form part of the whole life carbon assessment.

- The City Council acknowledges that the ReWWTP development is designed for a long working life with the ability to adapt and expand in the future. This is positive from a climate resilience perspective, but consideration should be made for quantifying the carbon impact of possible future expansion plans. Although it is assumed that expansion plans would be subject to separate planning applications if and when required, the City Council recommends a section should be included within the whole life carbon assessment relating to future development of the site and the potential carbon emissions resulting from this as this may impact on the deliverability of net zero aspirations.

Compliance with Policy

7.33 The proposed development meets the requirements of Local Plan Policy 28. It is considered that all the principles that require integration into the design of the development to ensure a good standard of sustainable design and construction, have plans and associated targets to address each of these areas.

8. TOPIC 3 - Noise and Vibration

Policy Context - Noise and Vibration

8.1 The relevant development plan policies that apply to the assessment of noise is Policy 35: Protection of human health and quality of life from noise and vibration of the Cambridge City Local Plan.

8.2 Policy 35 requires that development is only supported where it is demonstrated that it will not lead to significant adverse effects and impacts, including cumulative effects and construction phase impacts wherever applicable, on health and quality of life/amenity from noise and vibration. It requires that adverse noise effects/impacts be minimised by appropriate reduction and/or mitigation measures secured through the use of conditions or planning obligations, as appropriate.

8.3 The City Council seeks to ensure through its policy that noise from proposed commercial, industrial, recreational or transport use does not

cause any significant increase in the background noise level at nearby existing noise sensitive premises which includes dwellings.

Noise and Vibration Overview

8.4 The City Council is generally satisfied with the scope, methodology and conclusions derived as set out in (Chapter 15) of the ES [Doc ref.5.2.17] [AS-036].

8.5 However as raised previously with the Applicant, at the pre application consultation stage the City Council takes issue with the **'Table 2-7: Receptor sensitivity criteria'** [Doc. Ref. 5.2.17] [APP-049] assumed within that assessment below:

Table 2-7: Receptor sensitivity criteria

Sensitivity	Criteria	Examples
Low	Tolerant to change Lower quality/importance	Commercial, industrial and agricultural uses unless otherwise identified due to their specific circumstances.
Medium	Moderate tolerance to change Moderate quality/importance	Residential properties, educational facilities (such as schools and nurseries), listed buildings and assets of historical interest, community facilities such as village halls and health centres. External spaces for recreational amenity such as parks and PRoW.
High	Low tolerance to change Locally significant attribute of high value	Subject to specific circumstances.
Very High	Very low tolerance to change Nationally significant attribute of high value	Subject to specific circumstances.

8.6 Sensitivity used in the overall final significance of effect assessment, is determined based on consideration of the magnitude of an impact and the sensitivity of the receptor affected by the impact of that magnitude. In terms of the four sensitivities (Low, Medium, High and Very High), residential properties have been classified as having a 'Medium Sensitivity - Moderate tolerance to change and of Moderate quality/importance'.

8.7 The City Council considers from experience that residential properties (where people reside and sleep for long periods), are usually considered highly sensitive noise receptors with a low tolerance to change. In the

City Council's view, they are not comparable as receptors to community facilities such as village halls and external spaces for recreational amenity such as parks and Public Rights of Way (PRoWs). The assessment appears to have selected no receptors as being in the 'High to Very High' sensitivity category as they are subject to specific circumstances. The City Council considers therefore the noise assessment is likely currently to underestimate the overall significance of effects upon residential receptors as reported in [Doc. Ref. 5.2.17] [APP-049]. As such and the City Council considers either that the Applicant needs to explain why the classification of residential properties are correct as having 'Medium Sensitivity' or to reassess using the more appropriate criteria.

Construction / Decommissioning Positive Noise Impacts

8.8 No positive construction / decommissioning positive noise impacts have been identified.

Construction / Decommissioning Neutral Noise Impacts

8.9 No neutral construction / decommissioning positive noise impacts have been identified.

Construction / Decommissioning Negative Impacts

8.10 Construction noise and vibration impacts have been assessed through all relevant daily assessment time periods to consider potential impacts at receptors in the areas surrounding proposed construction activities. The preliminary assessments taking into account primary and tertiary mitigation have determined that impacts would predominantly result in negligible or minor adverse impacts that would not be significant on receptors within the City [Doc. Ref. 5.2.17] [AS-036]. The City Council agrees with this conclusion.

Construction / Decommissioning Noise and Vibration Mitigation

8.11 Additional secondary mitigation measures during construction are to be implemented as set out in the Noise and Vibration chapter of the ES [Doc Ref. 5.2.17] [AS-036], which includes the provision of solid site hoarding/acoustic barriers around construction compounds in select areas close to receptors, restriction of working hours to avoid sensitive times of the day and application of measures and Best Practicable Means

(BPM) in accordance with BS 5228. These measures are reflected in the Code of Construction Practice (CoCP Part A and B) [Doc. Ref. 5.4.2.1 & 5.4.2.2] [APP 068 and APP 069]. This will include a requirement for the preparation and approval of a detailed Construction Environmental Management Plan(s) (CEMP) which will be supported by a series of topic-based management plans.

8.12 The City Council agrees that, with the implementation of construction / decommissioning noise mitigation measures as proposed, moderate adverse noise and vibration impacts would be avoided or reduced, and the resulting effects would not be significant.

Operational Positive Noise and Vibration Impacts

8.13 The Applicant states in Table 5-1 of the Odour Chapter of the ES [Doc. Ref. 5.2.17] [APP-049] that no noise sources would remain following decommissioning of the existing CWWTP as it would no longer operate. Tanks would be drained and cleaned. Electrical and mechanical equipment would be disconnected. It is concluded that noise impacts associated with operation of the existing CWWTP are therefore expected to result in negligible or small beneficial effect. Due to this operational noise at the existing works are scoped out from assessment.

Operational Neutral Noise and Vibration Impacts

8.14 Due to the location and distance of the new ReWWTP facility from the administrative boundary of Cambridge City (to the north-east of Cambridge and 2km to the east of the existing CWWTP), the City Council accepts that operational noise from this facility is unlikely to have any impact on the City itself and receptors within. This is considered a neutral impact.

Operational Negative Noise and Vibration Impacts

8.15 Although the Applicant states that no noise sources would remain following decommissioning of the existing CWWTP, the City Council notes that a permanent Waste Water Transfer Tunnel Vent Stack (WWTTVS - located at Shaft 1) [Doc ref.5.2.17] [AS-036] is to be provided within the existing CWWTP site following relocation which will include provision for a chemical dosing facility (located on the existing CWWTP upstream of a new Shaft 1). The new interception Shaft 1 appears to be annotated as '18. Interception and first construction shaft'

[on drawing no. 00001-100006-CAMEST-ZZZ-LAY-Z-9001- Rev.C02–4.3.3 - Works Plans Revision No. 02, April 2023 Sheet 1]. Confirmation on the exact location of this needs to be provided.

8.16 No information is provided about this WWTTVS chemical dosing facility in terms of potential operational noise, size, or whether it will be a standalone building or another structure. The City Council therefore considers that further operational noise information for this chemical dosing facility needs to be provided and an operational noise impact assessment in the context of the future development of the North East Cambridge (NEC) area and high density residential that are potentially to be developed nearby should also be undertaken.

Operational Noise and Vibration Mitigation

8.17 Within the City no operational noise mitigation is proposed as no adverse impacts are envisaged. However, in the City Council's view, the Applicant should provide further operational noise information and impact assessment for the WWTTVS chemical dosing facility as noted above. Until this is provided for consideration it is not possible to conclude that no operational noise mitigation will be required.

Requirements - Noise and Vibration

8.18 During the construction and decommissioning stages, compliance with the measures set out within the Outline Decommissioning Plan, CoCP A and B will be secured by the requirements contained in the DCO (Doc. Ref. 5.4.2.3) [AS-051]. It is noted that this will include a requirement for the preparation and approval of a detailed Construction Environmental Management Plan(s) (CEMP) which will be supported by a series of topic-based management plans e.g., decommissioning and noise and vibration management plans as appropriate.

8.19 The City Council considers that the CEMP or alternatively a separate requirement imposed through the DCO should also ensure that any adverse construction and decommissioning noise impacts will be mitigated and minimised to an acceptable level.

8.20 The City Council notes that the CoCP Part A CEMP [APP 068] [DOC ref 5.4.2.1] makes reference to the consideration of S.61 consent notices under the Control of Pollution Act (CoPA) being sought. This should be

clarified owing to the potential dual regulation through both the planning and environmental health legislation (section 61). The City Council recommends that the CEMP provides the primary regulatory framework for the developer to operate within rather than utilising the S.61 consent through the COPA.

Compliance with Policy

8.21 In respect of noise and vibration impacts within the Cambridge City boundary, subject to the provision of satisfactory operational noise study and subsequent mitigation / abatement for the proposed permanent waste water transfer tunnel vent stack (WWTTVS) ventilation stack, which has not yet been designed the proposals are considered to be capable of meeting the requirements Policy 35 (noise and vibration) of the Cambridge Local Plan 2018.

9. TOPIC 4 - Odour Impacts

Policy Context - Odour

9.1 Policy 36 Air Quality, Odour and Dust of the Cambridge City Local Plan **[Appendix 1, GCSP-3]** advises that development will be permitted where it can be demonstrated that it does not lead to significant adverse effects on health, the environment or amenity from polluting or malodorous emissions, or dust or smoke emissions to air. Where a development is a sensitive end-use, it is required that there will not be any significant adverse effects on health, the environment or amenity arising from existing poor air quality, sources of odour or other emissions to air.

Odour Impact Overview

9.2 In general terms the methodology in respect of odour impact assessment [Doc. Ref. 5.2.18] [APP-050] is considered acceptable in principle.

Construction Positive Odour Impacts

9.3 The are no positive construction odour impacts identified.

Construction Neutral Odour Impacts

9.4 There are no neutral construction odour impacts identified.

Construction Negative Odour Impacts

9.5 Within Cambridge City potential negative odour impacts have been identified during construction of the interception shaft 1 at the start of the new waste water transfer tunnel and connection with the existing sewer within the CWWTP. Interception shaft 1 appears to be in the southwest corner just to the east of the existing Mick George Waste Processing Facility / Transfer Station on Cowley Road, CB4 0DL adjacent to the CWWTP scheme order red line boundary. It is annotated as '18. Interception and first construction shaft' (on drawing no. 00001-100006-CAMEST-ZZZ-LAY-Z-9001- Rev.C02– 4.3.3 - Works Plans Revision No. 02, April 2023 Sheet 1).

9.6 Decommissioning of the existing CWWTP processes and structures for the purposes of permit surrender e.g., limited to the draining and cleaning of existing processes / tanks / pipework (no physical demolition) is also identified as a potential source of adverse odour impact. An Outline Decommissioning Plan is also provided (Appendix 2.3, App Doc Ref 5.4.2.3) [AS-051] includes information in relation to the duration over which temporary odour emissions could be expected.

9.7 The City Council notes that these construction and decommissioning activities will be temporary, of relatively short duration and as such agrees with the results of the assessment of residual effect, taking into the account secondary mitigation measures contained within Part A and B of the Code of Construction Practice (CoCP) – (Appendix 2.1 – A and 2.2-B, App Doc Ref 5.4.2.1 & 5.4.2.2) [APP-068 and APP-069]. The Council agrees that overall, with the implementation of odour mitigation measures, the odour risks identified from the construction and decommissioning activities are likely to be negligible and not significant at the closest receptors within Cambridge City, the most sensitive being residential use premises at 18, 20 and 22 Cowley Road.

Construction and Decommissioning Odour Mitigation

9.8 The recommended construction related odour mitigation is detailed in Part A and B of the Code of Construction Practice (CoCP) – (Appendix 2.1 – A and 2.2-B of App Doc Ref 5.4.2.1 & 5.4.2.2))[APP-068 and APP-069] sets out how potential odour impacts arising from activities associated with connecting into and diverting existing sewers and decommissioning will be managed.

9.9 Odour may be released when connecting the new transfer tunnel to the existing sewerage and when the existing waste water flows are diverted to the ReWWTP during construction. The opening up of existing sewers may result in temporary odour releases, but it is agreed that this is not expected to last for a period of more than four weeks. In order to mitigate this potential impact an air extraction system will be put in place and a mobile odour filtration unit located adjacent to the sewer shafts as noted in [Doc. Ref. 5.2.17] [APP-049]

9.10 To ensure effective odour control, regular site inspections by the person accountable for odour issues on site is proposed to be undertaken during construction to minimise the risk of causing nuisance and/or loss of amenity. An inspection log will be kept and made available to the overseeing authority on request.

9.11 During the decommissioning process as set out in section 4.4 (Decommissioning), subsections 4.4.1 - 4.14 (Pages 58 - 60) of Chapter 18 of the ES - ES [Doc. Ref. 5.2.18] [APP-050] tanks will be drained through the existing treatment process as far as reasonably practical. Any residual sludge that cannot be pumped to the sludge treatment process within the primary settlement tanks, aeration tanks or final settlement tanks will be removed via suction pump and either taken offsite for treatment or treated onsite via a temporary pasteurisation process such as a quick lime dosing plant. These processes as the City Council understands it are usually sealed; however, the resulting cake can be odorous. If necessary, this cake will remain on site for as little time as possible. It is stated in Section 4.4.6 (Magnitude of Impacts) of Chapter 18 (Odour) of the ES [Doc. Ref. 5.2.18] [APP-050] that odour suppression equipment will be utilised where appropriate to minimise any offsite impacts. Any further site-specific measures will also be identified in the approved Decommissioning Plan which is currently provided as an outline document as part of the DCO application (Outline Decommissioning Plan, Application, doc ref. 5.4.2.3) [AS-051].

Operational Positive Odour Impacts

9.12 The decommissioning process (as detailed in Section 4.4, Chapter 18 of the Environmental Statement) aims to remove all above-ground (ongoing) emissions of odour from the existing CWWTP, specifically this will involve the emptying / draining and cleaning down of the various waste tanks which are the primary sources of odour on the existing site.

9.13 Paragraph 4.4.2 of Chapter 18 of the ES [Doc. Ref. 5.2.18] [APP-050] confirms that a Decommissioning Plan is to be provided that will give more specific detail on this process and on how odour is to be controlled during decommissioning. On completion of draining and cleaning of the tanks, it is considered that the primary sources of odour emissions on the site will have been removed and therefore ongoing odour potential will be removed. This will result in positive impacts locally when considering the existing environmental conditions. Relocation also removes the existing constraints imposed by the Waste Water Treatment Safeguarding Area designation upon the site and surrounds in respect of any development on land within 400m of the existing CWWTP. It is important to note that the decommissioning does not include provision for intrusive (below ground) decommissioning work. The release of any residual odour locked / contained beneath the surface will need to be addressed at the redevelopment stage. Notwithstanding this, we note that a waste water tunnel ventilation stack is proposed as a permanent fixture on the existing site. This is discussed in Sections 9.15 - 9.20) below.

Operational Neutral Odour Impacts

9.14 No neutral odour impacts have been identified.

Operational Negative Odour Impacts

9.15 The only potential source of operational odour that will remain within Cambridge City as the City Council understands it in the long term will be as noted from the permanent waste water transfer tunnel ventilation stack (WWTTVS -located at Shaft 1) which is to be located at the interception shaft 1 at the start of the waste water transfer tunnel within the existing Cambridge WWTP. Interception shaft 1 appears to be located in the southwest corner just to the east of the existing Mick George Waste Processing Facility, adjacent to the City WWTP scheme order red line boundary.

9.16 This ventilation structure will include a permanent WWTTVS inclusive of a carbon filter (to abate odours to a certain degree), extending to a height of up to 10m above ground level and an adjacent dosing station installation at ground level for odour control. The ES concludes that the likely odour effect is expected to be, at worst, **Negligible** at the nearest receptor locations based on the frequency, intensity and duration of any

effects, the source odour potential, pathway effectiveness, sensitivity of receptors and the function of embedded odour control features e.g., use of a permanent vent stack inclusive of carbon filter. No additional mitigation or enhancement measures are proposed, and the residual odour effects are **Negligible** and therefore **not significant**.

9.17 This conclusion is noted but it is unclear again as raised above if the actual receptors considered include those that form part of the land included within the emerging NECAAP. At previous pre-application consultation technical meetings with the Applicant, the City Council raised concerns about odour emissions from this WWTTVS and potential conflict with and compatibility with future residential development at the NEC site. This is especially so in terms of adverse impacts on amenity / quality of life and living conditions.

9.18 As such, there is a risk that future high density residential development proposed within the AAP will be close to and higher than the proposed WWTTVS and therefore they may be exposed to unacceptable levels of odour. This may also have implications for any spatial layout for future residential having regard to parameter heights or other areas of amenity.

9.19 The following additional information and clarification in the City Council's view needs to be provided:

- Confirmation is required on the location of the proposed permanent waste water transfer tunnel vent stack (WWTTVS) within the existing Cambridge WWTP, having due regard to the most current spatial masterplan for the NECAAP and parameter heights.

- Confirmation is required on whether potential future residential receptors as part of the future NEC AAP have been considered in the odour impact assessment. The current odour qualitative impact assessment of effects only appears to consider the current receptors closest to the proposed WWTTVS as Low to High sensitivity. Future surrounding NEC residential are all likely to be all of high sensitivity and they should also be considered. Consideration should be given to odour modelling of the WWTTVS to quantify any impacts and constraints this may have on delivering residential development as part of the future NEC AAP schemes.

- Confirmation is required on whether the WWTTVS as a piece of infrastructure will have any Anglian Water future planning application

requirements e.g., a minimum distance separation buffer or 'cordon sanitaire' from the vent to any future NEC development or similar.

- Confirmation is required on whether the 10m WWTTVS within the NECAAP core site is of sufficient height in order to facilitate adequate dispersion and dilution at high level if neighbouring future NEC buildings are higher than 10m themselves.

Operational Odour Mitigation

9.20 To mitigate operational odours associated with the proposed permanent 10m high waste water transfer tunnel vent stack (WWTTVS) the Applicant proposes a carbon filter (located at Shaft 1) to reduce odour emission and provision for a chemical dosing facility (located on the existing WWTP upstream of Shaft 1) to prevent septicity and therefore odour formation.

Requirements - Odour

9.21 The City Council understands that compliance with the measures proposed for the construction and decommissioning stages, set out within the Outline Decommissioning Plan, CoCP A and B [Doc ref 5.4.2.1 and 5.4.2.2] [APP 068 and APP 069] will be secured by requirements contained in the DCO (App Doc Ref 2.1). This will include a requirement for the preparation and approval of a detailed Construction Environmental Management Plan(s) (CEMP) which will be supported by a series of topic-based management plans as appropriate. These requirements should in the City Council's view ensure that any adverse negative construction and decommissioning odour impacts will be mitigated and minimised to an acceptable level.

9.22 For operational odours a requirement is proposed in the draft DCO for a detailed odour management plan to be submitted to and approved in writing by the relevant planning authority. It is agreed that the detailed odour management plan must be in accordance with the measures in the preliminary odour management plan and the principles and assessments set out in the relevant part of the ES (as reflected in Appendix 18.4 of doc ref. 5.4.18.4 [AS-106]. This includes reference to the proposed 10m high waste water transfer tunnel vent stack (WWTTVS) with a carbon filter (located at Shaft 1) and provision for a chemical dosing facility to prevent septicity and therefore odour formation and reduce odour emission.

9.23 Such a requirement is considered acceptable in principle subject to the Applicant providing the additional information and clarifications requested regarding potential odour impacts from the proposed permanent 10m high waste water transfer tunnel vent stack (WWTTVS) on the future emerging NECAAP receptors.

Compliance with Policy

9.24 I In respect of odour impacts within the Cambridge City boundary, subject to the provision of a satisfactory odour assessment and subsequent mitigation / abatement for the proposed permanent waste water transfer tunnel vent stack (WWTTVS) ventilation stack, which has not yet been designed the proposals are considered to be capable of meeting the requirements Policy 36 (air quality, odour and dust) of the Cambridge Local Plan 2018.

10. TOPIC 5 - Land Quality and Contamination

Policy Context - Land Quality and Contamination

10.1 Policy 33 of the Cambridge City Local Plan advises that development will be permitted where the Applicant can demonstrate that there will be no adverse health impacts to future occupiers from ground contamination resulting from existing/previous uses of the area; and there will be no adverse impacts to the surrounding occupiers, controlled waters and the environment from suspected/identified ground contamination from existing/previous uses.

10.2 Where contamination is suspected or known to exist, the policy requires an assessment to be undertaken to identify existing/former uses in the area that could have resulted in ground contamination; and if necessary, design and undertake an intrusive investigation to identify the risks of ground contamination, including groundwater and ground gases; and if proven there is a risk; submit a remediation strategy and/or adopt and implement mitigation measures, to ensure a safe development and ensure that the site is stable and suitable to the new use in accordance with the National Planning Policy Framework (2023), para. 183.

Land Contamination Overview

10.3 Land contamination is briefly discussed within Chapter 14 of The Environmental Statement [Doc ref 5.2.14] [AS-032]. In general terms, the City Council considers the contamination and land quality assessment to be acceptable.

10.4 The City Council acknowledge that unless excavated as part of decommissioning works, any contaminated soils will be left in-situ with liability passed on to future developers. It is noted that this is standard procedure.

10.5 The remit of the City Council Environmental Health Team sits primarily with protection of public health with the Environment Agency leading on issues concerning ground water and controlled waters. Following the decommissioning work of the existing Cambridge WWTP, as long as the land left is left untouched with contaminated soils beneath the surface, the City Council does not consider that there will be any significant risk to human health.

Construction Positive Land Quality and Contamination Impacts

10.6 No positive construction impacts have been identified.

Construction Neutral Land Quality and Contamination Impacts

10.7 No construction neutral impacts have been identified.

Construction Negative Land Quality and Contamination Impacts

10.8 No construction negative impacts have been identified.

Construction Land Quality and Contamination Mitigation

10.9 The City Council will not require and specific construction mitigation measures.

10.10 Notwithstanding the absence of a site-wide full ground investigation report, the City Council notes a potential risk to any contractor involved in decommissioning works on the existing site, particularly where any excavations are required. However, this is a matter of standard site health and safety procedure and falls within the remit of the Health and Safety Executive.

Operational Positive Land Quality and Contamination Impacts

10.11 The existing site will eventually be redeveloped and as such soil contamination will need to be remediated to a standard suitable any intended future use through the planning process. This is considered to will lead to a betterment in the local environment.

Operational Neutral Land Quality and Contamination Impacts

10.12 No operational neutral impacts have been identified.

Operational Negative Land Quality and Contamination Impacts

10.13 No operational negative impacts have been identified.

Operational Land Quality and Contamination Mitigation

10.14 No operational mitigation measures have been identified.

Requirements - Land Quality and Contamination

10.15 The following requirements should be considered as part of the DCO to protect safeguard the amenities of the surrounding community.

- Decommissioning works at the existing site to be completed in full and fully in accordance with the Decommissioning Plan. This will ensure that there is no potential for any continued contamination of subsurface soils.

Compliance with Policy

10.16 In respect of land contamination, subject to further details on the siting and operational impact of the proposed ventilation stack, within the Cambridge City boundary, the City Council considers that the proposed

development accords with Policy 33 (land contamination) of the Cambridge Local Plan 2018.

11. TOPIC 6 - Air Quality Impacts

Policy Context - Air Quality

11.1 Policy 36 Air Quality, Odour and Dust of the Cambridge City Local Plan advises that development will be permitted where it can be demonstrated that it does not lead to significant adverse effects on health, the environment or amenity from polluting or malodorous emissions, or dust or smoke emissions to air. Where a development is a sensitive end-use, it is required that there will not be any significant adverse effects on health, the environment or amenity arising from existing poor air quality, sources of odour or other emissions to air.

Air Quality Overview

11.2 The City Council's primary consideration for local air quality is with regards to vehicle emissions. Impacts on local air quality are assessed / considered within Chapter 7 of the ES [Doc ref 5.2.7] [APP-039]. The City Council agrees with the scope and methodology used by the Applicant.

11.3 There will be vehicle movements around Cowley Road and Milton Road associated with the decommissioning work at the existing site. However, these movements will be temporary in nature and equate approximately to the number of movements to and from the existing operational site. In terms of the operation of the new facility, this should have no impact on vehicle emissions within the City.

Construction Positive Air Quality Impacts

11.4 There are no positive construction impacts within the Cambridge City boundary as a result of the construction or decommissioning activities associated with the proposed development.

Construction Neutral Air Quality Impacts

11.5 There are identified neutral impacts within the Cambridge City boundary in respect of decommissioning of the existing facility in that the number of

heavy goods vehicle (HGV) movements anticipated for the decommissioning of the existing site will approximately equate to the number of vehicles that currently enter and leave the site. Therefore, this can be considered a neutral impact.

11.6 There are no neutral impacts within the Cambridge City boundary associated with the construction of the new facility.

Construction Negative Air Quality Impacts

11.7 No negative air quality impacts are identified as a result of the construction of the new facility and the decommissioning of the existing facility.

Construction Air Quality Mitigation

11.8 No mitigation is required when considering construction and decommissioning impacts on local air quality within the Cambridge City boundary.

Operational Positive Air Quality Impacts

11.9 The following have been identified as positive operational impacts:

- Reduction in HGV vehicle movements within the locality of Cowley Road and Milton Road and therefore a reduction in vehicle emissions in the area.

Operational Neutral Air Quality Impacts

11.10 There are no neutral impacts associated with local air quality as a result of the operation of the new facility.

Operational Negative Air Quality Impacts

11.11 There are no negative impacts associated with local air quality as a result of the operation of the new facility.

Operational Air Quality Mitigation

11.12 From a City Council perspective, there is no requirement for operational mitigation when considering local air quality.

Requirements - Air Quality

11.13 This is not applicable when considering local air quality within the City.

Compliance with Policy 36.

11.14 In respect of Local Air Quality Management (LAQM) within the Cambridge City boundary, the City Council considers that the proposed development accords with Policy 36 (air quality, odour and dust) of the Cambridge Local Plan 2018.

12. TOPIC 7 - Public Health

Policy Context - Public Health

12.1 Policy 35 of the Cambridge City Local Plan seeks to ensure that development does not result in significant adverse effects and impacts, including cumulative effects and construction phase impacts wherever applicable, on health and quality of life/amenity from noise and vibration.

Public Health Overview

12.2 Cambridge City Council is a signatory of the 2022 Cambridgeshire and Peterborough Integrated Care System (CPICS) Health Care Strategy) **[Appendix 1, GCSP- 50].** This Strategy outlines the three overarching health goals for residents living within the County:

- To increase the number of years people spend in good health;
- To reduce inequalities in preventable deaths before the age of 75; and
- To achieve better outcomes for our children.

12.3 To help achieve these goals four core priorities have been identified by the Authorities which are envisioned to work together as a system to achieve:

- Ensure our children are ready to enter education and exist, prepared for the next phase of their lives;
- Create an environment to give people the opportunities to be as healthy as they can be;

- Reduce poverty through better employment, skills and better housing; and
- Promote early intervention and prevention measure to improve mental health and wellbeing.

12.4 These should run as a golden thread throughout the decision-making process and form the basis for how decisions are determined. As part of the assessment of impacts related to this proposal, the main consideration is by how far the proposed development helps to achieve any of the above stated goals.

12.5 The City Council agrees with the approach taken by the Applicant to the assessment and the methodology of health impacts associated with the proposed development as outlined in Chapter 12 of the ES (Health) [Doc.Ref.5.2.12] [APP-044].

12.6 The City Council is also satisfied with the geographical study area, temporal scope and the baseline study. The elements which have been scoped out, which provide a clear rationale for the decision are also supported. The City Council also support the measures adopted as part of the proposed development as well as the Baseline environment outlined in Chapter 3 [Doc ref 5.2.3] [AS-018].

Construction Positive Public Health Impacts

12.7 There are no positive construction impacts that have been identified from a public health perspective.

Construction Neutral Public Health Impacts

12.8 With regard to the increased local presence of construction staff the City Council notes the proposed Code of Construction Practice (CoCP) [Doc ref 5.4.2.1 and 5.4.2.2] [APP 068 and APP 069] outlines that:

- The CoCP will require all construction workers to undertake appropriate training including an expectation as to their behaviour and conduct whilst on site. Should a member of the community have concerns, the City Council considers the CoCP should contain clear guidelines on how this can be reported and addressed.
- A draft Community Liaison Plan [Doc Ref 7.8] [AS-132] is proposed to include communication of construction activities

including community liaison. Any disruption in relation to access to local roads and PROWs or any works to be undertaken outside of the agreed hours of construction should be proactively communicated to the relevant community groups through the CLP.

- The City Council considers that a full-time staff member should be recruited to manage the Community liaison and engage and work with the community throughout construction and this should be reflected in the CLP.

Construction / Decommissioning Negative Public Health Impacts

12.9 There are a number of negative impacts to be considered in relation to odour, noise, light, vibration, air quality. These are addressed by the proposed CEMP as detailed in the CoCP Appendix 2.1 and 2.2 [APP-068 and APP-069].

12.10 There is no formal guidance on considering health within the context of EIA. Therefore, the City Council agrees with the approach taken by the Applicant to the assessment and the methodology used as outlined in Chapter 12 of the ES (Health) [Doc Ref: 5.2.12] [APP-044]. Namely, the approach has been influenced using the City Council's SPD for HIA (Policy 35) and the EIMA guide "Health in Environmental Impact Assessment; A primer for proportionate approach[1].

12.11 There is no formal guidance on considering health within the context of EIA. Therefore, the City Council agrees with the approach to the assessment and the methodology used as outlined in Chapter 12 of the ES (Chapter 12: Health) [Reference: 5.2.12] [APP-044] as well as the EIMA guide "Health in Environmental Impact Assessment; A primer for proportionate approach (Cave, Fothergill, Pyper, Gibson & Saunders, 2017).

12.12 The Study Area has been defined by analysing potential health effects as a result of construction, operation and decommissioning of the proposed development. Again, the City Council is content with this approach and is also satisfied with the geographical study area, temporal scope and the baseline study.

12.13 The elements which have been scoped out, which provide clear rationale for the decision, as set out in the EIA Scoping Report (2021) **(Appendix**

1, no 42) are also supported. The City Council also supports the mitigation measures adopted (as outlined in Section 2.9 of the Health Chapter of the ES) [Doc Ref: 5.2.12] [APP-072] this includes the Applicant's approach to embed some measures through primary mitigation and through secondary measures. These may be detailed activities such as an environmental management plan to address air quality or noise.

Construction Public Health Mitigation

12.14 The proposed mitigation measures to be employed during the construction period have been considered by the City Council in the context of effect on public health.

12.15 Table 2-7 of the ES (Chapter 12: Health) [Doc Ref: 5.2.12] [APP-044] states that during construction there will be a peak of approximately 300 staff employed at the site. Notwithstanding that most of the construction activities will be located within South Cambridgeshire (at the new CWWTP location), there are elements that relate to Cambridge City that should warrant local jobs be prioritised for local residents.

12.16 To ensure that local jobs are prioritised for local people, the City Council recommends that jobs are advertised locally for the first 2 weeks prior to more national recruitment portals. This should be reflected in the Community Liaison Plan.

12.17 There should also be opportunities created for students and recent graduates of the Cambridge Regional College to maximise opportunities for apprenticeship roles. This should be reflected in the Community Liaison Plan.

Operational Positive Public Health Impacts

12.18 The City Council has not identified any positive operational impacts associated with the health.

Operational Neutral Public Health Impacts

12.19 The City Council notes the temporary changes to health and wellbeing due to an increase in noise, air quality, dust, odour, traffic and visual effects during the decommissioning of the existing WWTP as set out in Chapter 12 of the ES (Health) [Doc Ref: 5.2.12] [APP-044].

12.20 There is also a potential risk to human health from potential water polluting water, hazardous waste and substances, and increases in pests during this phase as outlined in para 2.2.14 of Chapter 12 of the ES (Health) [Doc Ref: 5.2.12] [APP-044].

12.21 The City Council agrees with the Applicant that these impacts may be short term in nature and therefore considers this to be a neutral impact (Section 4.3 of Chapter 12 of the ES (Health) [Doc Ref: 5.2.12] [APP-044].

Operational Negative Public Health Impacts

12.22 There are a number of negative impacts to be considered in relation to odour, noise, light, vibration, air quality. These are addressed by the proposed CEMP as detailed in the CoCP Appendix 2.1 and 2.2 [APP-068 and APP-069].

12.23 As noted within the Odour Impacts chapter of the ES, in particular para 1.4.3, Table 1-5 [Doc. Ref. 5.2.18] [APP-050] the only potential source of operational odour that will remain within Cambridge City in the long term will be from a permanent waste water transfer tunnel ventilation stack (WWTTVS -located at Shaft 1) which is to be located at the interception shaft 1 at the start of the waste water transfer tunnel within the existing Cambridge WWTP. Interception Shaft 1 appears to be located in the southwest corner just to the east of the existing Mick George Waste Processing Facility, adjacent to the City WWTP scheme order red line boundary.

12.24 As detailed in para.1.4.3 Table 1-5 of the odour ES Chapter [Doc. Ref. 5.2.18] [APP-050], the City Council raised concerns at pre-app stage in respect of odour emissions from this WWTTVS and potential conflict and compatibility with future residential development at the NEC site.

12.25 There is no formal guidance on considering health within the context of EIA. Therefore, the City Council agrees with the approach to the assessment and the methodology used as outlined in Chapter 12 of the ES (Chapter 12: Health) [Reference: 5.2.12] [APP-044]. Namely, the approach has been influenced using the South Cambridgeshire District Council's Health Impact Assessment SPD (see policy SC/2) and the EIMA guide "Health in Environmental Impact Assessment; A primer for proportionate approach (Cave, Fothergill, Pyper, Gibson & Saunders, 2017). The Study Area has been defined by analysing potential health

effects as a result of construction, operation and decommissioning of the proposed development. Again, the City Council is content with this approach and is also satisfied with the geographical study area, temporal scope and the baseline study.

12.26 The elements which have been scoped out, which provide clear rationale for the decision, as set out in the EIA Scoping Report (2021) **[Appendix 1, GCSP- 42]** are also supported. The City Council also supports the mitigation measures adopted (as outlined in Section 2.9 of the Health Chapter of the ES) [Doc Ref: 5.2.12] [APP-072] this includes the Applicant's approach to embed some measures through primary mitigation and through secondary measures. These may be detailed activities such as an environmental management plan to address air quality or noise.

Operational Public Health Mitigation

12.27 The City Council is not clear from the stakeholder engagement details provided [Doc ref 5.2.11] [AS-028] if any proactive engagement was undertaken with the Gypsy, Roma, Traveller (GRT) community. There are 2 sites within close proximity to the site, at Milton and on Fen Road. To ensure this minority ethnic group is adequately represented, the City Council consider that all on going community engagement plans/strategies should involve this cohort.

12.28 It is acknowledged that whilst the pre application consultation was wide it is noted that the level of response was low [Doc ref 5.2.11] [AS-028]. Therefore, the City Council considers that there needs to be active engagement along the lines suggested to protect the interests of previously identified vulnerable population groups.

Requirements - Public Health

12.29 The City Council supports the recommendations set out within the Odour Impacts section [1.4.3 Table 1-5 of Doc. Ref. 5.2.18] [APP-050].

12.30 The City Council considers that provision needs to be made within the Community Liaison Plan to ensure effective engagement with identified vulnerable population groups including the Gypsy, Roma, Traveller (GRT) community is undertaken.

12.31 In respect of Construction Traffic Management Plan (CTMP) (ES Chapter 19, Appendix 19.7] [Doc ref 5.4.19.7], [AS-109], the reports states that controls will be put in place to prevent construction traffic from travelling through Cowley Road and Milton Road. The CMTP also sets out [Section 6.9 of the CTMP [Doc ref 5.4.19.7], [AS-109] also sets out that construction traffic must avoid the AM and PM peak periods as well as school pickup and drop off hours. The City Council therefore requests that the details of how this will be monitored, reported and enforced be provided within the CMTP.

12.32 The City Council supports the provision of a Community Liaison Plan (CLP) as proposed in [Doc Ref 7.8] [AS-132] to be put in place to proactively inform local communities and stakeholders of any scheduled construction works and the potential duration of those works. Works falling outside of agreed core working hours should be made clear, along with any potential obstruction to PRoWs, businesses, facilities and local infrastructure.

12.33 In respect of the mental health and wellbeing assessment [Appendix 12.3, App Doc Ref 5.4.12.3] [AS-077, the City Council is satisfied that baseline measurements have been taken however is it is noted that no specific reference in chapter 5.2 as to how mitigation would be secured, or when further assessments would be undertaken to monitor change have been included. The City Council considers t this information needs to be provided.

Compliance with Policy

12.34 The proposed development would, in the City Council's view, accord with the principles of Policy 35 of the Local Plan. It has suggested a number of matters should be addressed further as set out above.

13. TOPIC 8 - Community Impact

Policy Context - Community

13.1 Policy 56 of the Local Plan requires new development to be designed to remove the threat or perceived threat of crime and improve community safety.

13.2 The City Council is generally in agreement with the methodology employed by the Applicant in Chapter 11 of the ES (Community) [Doc.Ref.5.2.11] [AS-028].

13.3 The City Council also notes that the works to be undertaken within the City are limited to decommissioning elements, the construction of the ventilation shaft and the Waste Transfer Tunnel.

13.4 The community impact associated with the above elements is likely to be limited to safeguarding against any transitionary community impacts including noise and odour monitoring as well as monitoring anti-social behaviour on the existing site once it is no longer operational. These matters have also been considered under the relevant sections within this report.

Community Impact Overview

13.5 The communities that are within close proximity to the proposed development are Milton, Chesterton and Fen Road and Stow cum Quy. The City Council is generally satisfied with the methodology employed by the Applicants set out in Section 2 of the Community Chapter of the ES [Doc 5.2.11] [AS-028] notes potential community impacts during the decommissioning of the existing CWWTP.

Construction/Decommissioning Positive Community Impacts

13.6 During decommissioning of the of the existing CWWTP, there would be a beneficial impact on the economy through the provision of employment opportunities through supply chain benefits to the economy.

13.7 The City Council supports the inclusion of an on-going Community Liaison Plan and a requirement to reflect that with the status of this as a live document.

Construction/Decommissioning Neutral Community Impacts

13.8 There are no community impacts that have been identified by the Applicant associated with the decommissioning of the existing CWWTP. It is advised that the activities that would occur within the existing CWWTP would be temporary and not result in disturbance to community receptors, particularly residential properties, community resources, businesses or areas of formal open space and recreational parks. Therefore,

decommissioning is not considered further within this aspect of the assessment.

Construction/Decommissioning Negative Community Impacts.

13.9 There are no negative impacts that have been identified for residents who live adjacent the existing CWWTP during the decommissioning period.

Construction/Decommissioning Community Mitigation

13.10 Given the nature of decommissioning and the potential for any unforeseen short term transitional problems, the City Council supports the inclusion of an on-going Community Liaison Plan and a requirement to reflect that with the status of this as a live document.

Operational Positive Community Impacts

13.11 There are no matters that have been identified as positive operational impacts on the local communities surrounding the proposed development.

Operational Neutral Community Impacts

13.12 There are no matters that have been identified as neutral operational impacts on the local communities surrounding the proposed development.

Operational Negative Community Impacts

13.13 As noted in para. 12.13 of this report the only potential source of operational odour that will remain within Cambridge City in the long term will be from a permanent waste water transfer tunnel ventilation stack (WWTTVS -located at Shaft 1) [Doc ref.5.2.17] [AS-036]. The City Council remains concerned that there may be impacts on future residential development in this area due to the odour emissions from the WWTTVS.

13.14 It is also considered that there may be a negative impact on any spatial layout for future residential having regard to parameter heights or other

areas of amenity and further detail is needed to assess this potential impact.

Operational Community Mitigation

13.15 The City Council supports the recommendations set out within the Odour Impacts section of this report [para.1.4.3 Table 1-5, Doc. Ref. 5.2.18] [APP-050]. In addition, the City Council supports the inclusion of an on-going Community Liaison Plan with the status of this as a live document.

Requirements - Community

14.12 The City Council has no further requirements to suggest in respect of likely community impacts.

Compliance With Policy

13.16 The proposed development would, in the City Council's view, accord with the principles of Policy 56 of the Local Plan. It has suggested a number of matters should be addressed further as set out above.

14. TOPIC 9 - Highways and Transportation

Policy Context - Highways and Transportation

14.1 Policy 5: Sustainable Transport and Infrastructure and Policy 81: of the Cambridge City Local Plan as well as Policy 81: Mitigating the transport impact of development Cambridgeshire are both relevant to this proposal. Policy 5 relates to mitigating the transport impact of development and as such requires:

a. sufficient information to be supplied with all development proposals that the transport impact can be suitably assessed. This should take the form of transport assessments for schemes above the thresholds set in the latest Cambridgeshire County Council guidance;
b. a travel plan to accompany all major development proposals; and
c. reasonable and proportionate financial contributions/mitigation measures where necessary to make the transport impact of the development acceptable.

Highways and Transport Overview

14.2 Within the boundaries of Cambridge City, the proposed development activities would encompass decommissioning activities, which are expected to take place at the end of the construction phases, between June 2027 to December 2027 as well as the construction of the ventilation shaft and Waste Transfer Tunnel.

14.3 For the Waste Transfer Tunnel, the submitted Traffic and Transport Chapter of the ES indicates that there will be 72 daily construction vehicle movements [Table 2-12, Doc. Ref. 5.2.19] [AS-038]. The assessment details the effects of transfer tunnel peak daily vehicle movements on the sites in Milton Road and Cowley Road and on Horningsea Road and junction 34 of the A14 in year 3 of construction.

Construction / Decommissioning Positive Highways and Transportation Impacts

14.4 There are no positive construction impacts that have been identified by the City Council.

Construction / Decommissioning Neutral Highways and Transportation Impacts

14.5 The assessment for decommissioning of the existing WWTP concludes that there would be 150 daily vehicle movements on Milton Road and Cowley Road during this period. These would access and egress the existing WWTP via Cowley Road [Doc. Ref.5.2.19] [AS-038] This daily peak is based on the assumption that all decommissioning activities would occur simultaneously. Although this is additional traffic on significantly busy routes within north east Cambridge, the submitted Traffic and Transport Chapter of the ES [Doc. Ref.5.2.19] [AS-038] indicates that:

'*the addition of the 150 vehicle movements on the existing road network does not constitute a 30% change or a 10% change on sensitive links (the links do not include accidents black spots, conservation areas, hospitals or high pedestrian flows) and therefore no further assessment has been undertaken on these links*' [para 4.4.7].

14.6 Although the City Council notes the Applicant's conclusion that the above stated traffic movements are neutral or not significant, it is considered that there are also likely to be construction activities taking place within this area during this period, and there may be a cumulative negative impact on traffic within the Cambridge City. It is however acknowledged that the Cambridge County Council, in their capacity as the Highway Authority, would be able to provide a more detailed analysis of potential transport and traffic impacts and the City Council defers to their assessment and judgement.

Construction / Decommissioning Negative Highways and Transportation Impacts

14.7 No negative impacts in respect of construction traffic impact have been identified.

Construction / Decommissioning Highways and Transportation Mitigation

14.8 The City Council has not identified any additional mitigation that should be provided. The recommended construction mitigation is to be assessed by Cambridgeshire County Council in their capacity as the Highway Authority and the City Council defers to their assessment and judgement.

Operational Positive Highways and Transportation Impacts

14.9 No positive operational impacts related to Traffic and Transport have been identified by the City Council. This matter is for Cambridge County Council, as the Highway Authority, to consider.

Operational Neutral Impacts

14.10 No neutral operational impacts related to Traffic and Transport have been identified by the City Council. This matter is for Cambridge County Council, as the Highway Authority, to consider.

Operational Negative Highways and Transportation Impacts

14.11 No negative operational impacts related to Traffic and Transport have been identified by the City Council. This matter is for Cambridge County Council, as the Highway Authority, to consider.

Operational Highways and Transportation Mitigation

14.12 Any DCO requirements in relation to Highways and Transportation impacts are a matter for Cambridgeshire County Council as the Highway Authority.

Compliance With Policy

14.13 The City Council would defer to Cambridgeshire County Council as the relevant highway authority as to whether the application and the proposed development would meet Policy 81 of the Cambridge Local Plan. The ExA is therefore referred to the LIR of Cambridgeshire County Council relies upon the full assessment of highway and transport impacts by in this jurisdiction.

15. CONCLUSIONS

15.1 The LIR has identified relevant national and local plan policies. It has identified those Cambridge Local Plan policies which it considers may be relevant sought to assess where possible whether the proposed development would be said to be in compliance with those policies, notwithstanding that under the Town and Country Planning Act 1990 and the Planning and Compulsory Purchase Act 2004 the development plan that is relevant to waste water infrastructure is the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021.

15.2 The City Council as noted above has not sought to mimic an exercise under s38(6) of the Planning and Compulsory Purchase Act 2004 and the s70 of the Town and Country Planning Act 2008 and then carry out a planning balance exercise as this would clearly be inappropriate. This is not only because it would not be the relevant decision maker under such Acts in any event but also because the planning balance exercise under the Planning Act 2008 is an exercise solely for the ExA and ultimately the Secretary of State.

15.3 The LIR for the City Council has identified the short term negative social and environmental impacts anticipated during the construction phase of the proposed development. Such impacts include increased traffic

generation, construction disturbance and diversions for pedestrians, cyclists and motorists. Longer term residual impacts include the potential for noise and odour impacts. Whilst there is potential to mitigate a number of these impacts, it will not be possible to eradicate them completely.

15.4 The LIR highlights Cambridge City Council and South Cambridgeshire District Council's shared long-held ambition to regenerate the part of the City within which the existing CWWTP is located. The interdependence between the DCO process and the development plan process in so far as it relates to proposed redevelopment of the site has been narrated and explained as part of this report. There is clear evidence through the emerging plan making processes of the significant benefits that would be enabled by the relocation of the Cambridge Waste Water Treatment Plant (the CWWTP site) and the extensive area of surrounding, underutilised, previously developed land, where regeneration potential has been effectively sterilised.

15.5 The City Council considers these benefits to be as follows:

- The proposal will secure £227m in Government (HIF) funding to address the viability constraint to redevelopment of the existing CWWTP site.
- It will enable the comprehensive development of the wider NEC area, one of the most significant locations in the City and the UK for science, technology and innovation, optimising the development potential and enabling other benefits to the City to be realised.
- The release of the existing CWWTP site for redevelopment will remove the existing constraints imposed by the Waste Water Treatment Safeguarding Area designation upon the site and surrounds in respect of any development on land within 400m of the existing CWWTP, which incorporates a substantial area of previously developed land.
- This in turn enables the future development of the wider NEC area, including the existing CWWTP site, which is identified through the evidence supporting the emerging joint Greater Cambridge Local Plan (Regulation 18) as the most sustainable location in Greater Cambridge for development.
- The release of the existing CWWTP site will underpin the delivery of 8,350 homes. This is demonstrated by the evidence in support of the Draft Proposed Submission AAP (Regulation 19) **[Appendix 1, GCSP-7]** which shows the potential for the existing CWWTP site, once vacated together with neighbouring City Council owned land to accommodate c.5,600 net new homes, and by removing

environmental constraints, to enable up to a further c.2,750 net new homes on surrounding sites.

- Enabling the NEC area to come forward will make a significant contribution to the substantial objectively assessed housing need in accordance with the NPPF of the Greater Cambridge area identified in the emerging Greater Cambridge Local Plan to 2040 and beyond.
- In addition to housing, the site also offers the opportunity to deliver further beneficial commercial floorspace and a range of town centre uses, as well as social and physical infrastructure that will support the area's continued growth as a strategically important economic driver for Greater Cambridge and create a vibrant new mixed use urban quarter to Cambridge.
- The delivery of a new water treatment infrastructure that delivers treatment to a higher standard with lower energy use and carbon emissions than the existing plant.
- Increased on-site storage of foul/untreated water during storm flows contributing positively to the improved resilience of the Water environment and rivers downstream to the foul water discharge point.

15.6 The City Council considers these benefits amount to economic, environmental and social benefits to the locality and the region that are substantial.

15.7 As such the City Council gives in principle support to the DCO application and the proposed development, subject to the resolution of a number of matters and, more specifically, to the assessment of the ExA and the determination by the Secretary of State of the DCO application in light of the ExA's report and recommendation.

Glossary of Acronyms

(d)DCO	(draft) Development Consent Order
A&ROW	Access & Rights of Way
AAP	Area Action Plan
ACOP	Approved Codes of Practice
AD	Anaerobic Digestion AEGL Acute Exposure Guideline Level
AIA	Arboricultural Impact Assessment
AIL	Abnormal Indivisible Loads
ANGSt	Natural England's Accessible Natural Greenspace Standards
AQMA	Air Quality Management Area
AW	Anglian Water
BNG	Biodiversity Net Gain
BSI	British Standards Institute
C&U	The Road Vehicles (Construction and Use) Regulations 1986
CCC	Cambridgeshire County Council
CCS	Considerate Constructors Scheme
CDG	Cambridge Delivery Group
CEEQUAL	Civil Engineering Environmental Quality Assessment and Awards Scheme
CEMP	Construction Environmental Management Plan
CFRS	Cambridgeshire Fire and Rescue Service
CGLP	Greater Cambridge Local Plan
CHER	Cambridgeshire Historic Environment Record
CHP	Combined Heat and Power
CIEEM	Chartered Institute of Ecology and Environmental Management
CIRIA	Construction Industry Research and Information Association
COMAH	Control of Major Accident Hazards
COPA	Control of Pollution Act 1974
CO_X	Carbon Oxides
CTMP	Construction Traffic Management Plan
CWS	County Wildlife Site
CWWTP	Cambridge Waste Water Treatment Plant Relocation Project
DAMS	Detailed Archaeological Mitigation Strategy
DCLG	Department for Communities and Local Government
DEFRA	Department for Environment, Food & Rural Affairs
DEMP	Decommissioning Environmental Management Plan
DfT	Department for Transport
DLUHC	The Department of Levelling Up, Housing and Communities
DM	Development Management
DMRB	National Highways Design Manual for Roads and Bridges

DMS	Delivery Management System
ECoW	Ecological Clerks of Works
EN-1	Overarching National Policy Statement for Energy
EN-3	National Policy Statement for Renewable Energy Infrastructure
ES	Environmental Statement
ExA	Examining Authority
ExAQ1	First set of questions from the Examining Authority
EZ	Enterprise Zone
FCTMPTP	Framework Construction Transport Management Plan and Travel Plan
FEH	Flood Estimation Handbook
FPRF	Fire Protection Research Foundation
FRA	Flood Risk Assessment
FRS	Fire and Rescue Service
FSR	Flood Studies Report
FTE	Full Time Equivalent
GEART	Guidelines of Environmental Assessment of Road Traffic
GLVIA	Guidelines for Landscape and Visual Impact Assessment
GPD	Cambridgeshire's General Principles for Development
HA	Highways Act 1980
HB	Home-based
HDD	Horizontal Directional Drilling
HERCS	Cambridgeshire's Housing Estate Road Construction Specification
HGV	Heavy Goods Vehicle
HIF	Housing Infrastructure Fund
HRA	Habitats Regulations Assessment
INNS	Invasive non-native species
LAeq	Equivalent Continuous Sound Level
LCRM	Land Contamination Risk Management
LDA	Land Drainage Act 1991 S23(1)
LDS	Local Development Scheme
LEMP	Landscape and Ecological Management Plan
LERMP	Landscape, Ecological and Recreational Management Plan
LGV	Light Goods Vehicle LHA Local Highway Authority
LIR	Local Impact Report
LLCA	Local Landscape Character Area
LLFA	Lead Local Flood Authority
LNR	Local Nature Reserve
LOAEL	Lowest Observed Adverse Effect Level
LP	Local Plan
LPA	Local Planning Authority
LTP	Local Transport Plan

LVIA	Landscape and Visual Impact Assessment
MAFF	Ministry of Agriculture, Fisheries and Food
MSA	Mineral Safeguarding Area
MWPA	Minerals and Waste Planning Authority
NALEP	New Anglia Local Enterprise Partnership
NCA	National Character Area
NDHA	Non-Designated Heritage Asset
NE	Natural England NG National Grid
NEC	North East Cambridge
NECAAP	North East Cambridge Area Action Plan
NGO	Non-Governmental Organisation
NMU	Non-Motorised User
NNR	National Nature Reserve
NOEL	No Observed Effect Level
NOX	Nitrogen Oxides
NPPF	National Planning Policy Framework
NPPG	National Planning Policy Guidance
NPS	National Policy Statements
NPSWW	National Policy Statement for Waste Water
NSIP	Nationally Significant Infrastructure Project
OEMP	Operational Environmental Management Plan
OLEMP	Operational Landscape and Ecological Management Plan
ONS	Office for National Statistics
OS	Ordinance Survey (map)
OTP	Outline Travel Plan
PEIR	Preliminary Environmental Information Report
	Peterborough Minerals and Waste Local Plan 2021
PINS	Planning Inspectorate
PMX	Fine Particulate Matter
PROW	Public Rights of Way
PV	Photovoltaic
ReWWTP	Relocated Cambridge Water Waste Treatment Plant
ROWIP	Rights of Way Improvement Plan
RPA	Root Protection Area
RR	Relevant Representation
RSPB	Royal Society for the Protection of Birds
RTRA	Road Traffic Regulation Act 1984
SAC	Special Area of Conservation
SCDC	South Cambridgeshire District Council
SMART	Specific, Measurable, Ambitious (yet attainable), Relevant and Time-bound
SMWLP	Suffolk's Mineral and Waste Local Plan

SOAEL	Significant Observed Adverse Effect Level
SoCG	Statement of Common Ground SoS Secretary of State [N.B. specified by context]
SPA	Special Protected Area
SPD	Supplementary Planning Document
SRN	Strategic Road Network
SSSI	Site of Special Scientific Interest
STEM	Science, Technology, Engineering and Mathematics
STGO	Road Vehicles (Authorisation of Special Types) (General) Order 2003
SuDS	Sustainable Drainage Systems
TA	Transport Assessment
TMMS	Traffic Management and Monitoring System
TPO	Tree Preservation Order
WAML	West Anglian Mainline
WRMP	Water Resources Management Plan
WRMP	Water Resources Management Plan (Cambridge Water)
WWT	Waste Water Treatment
WWTP	Waste Water Treatment Plant
WWTTVS	Waste Water Transfer Tunnel Vent Stack

Appendix 1 –Evidence Library

GCSP –

1) **South Cambridgeshire Local Plan 2018**

Adopted/Published: 2018
Author: South Cambridgeshire District Council
Link: https://www.scambs.gov.uk/media/17793/south-cambridgeshire-adopted-local-plan-2018.pdf

2) **South Cambridgeshire Local Plan 2018 - Adopted Police Map – Inset B - Cambridge Northern Fringe East**

Adopted/Published: 2018
Author: South Cambridgeshire District Council
Link: https://www.scambs.gov.uk/media/12395/inset-b-cambridge-northern-fringe-east.pdf

3) **Cambridge City Local Plan 2018**

Adopted/Published: 2018
Author: Cambridge City Council
Link: https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf

4) **Cambridge City Local Plan 2018 – Policies Map**

Adopted/Published: 2018
Author: Cambridge City Council
Link: https://www.cambridge.gov.uk/media/6892/development-plan-adopted-policies-map.pdf

5) **Greater Cambridge Local Plan - First Proposals (Regulation 18: Preferred Options 2021)**

Adopted/Published: 2021
Author: Greater Cambridge Shared Planning
Link: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-10/First%20Proposals%20-%20FINAL%20FURTHER%20REVISED%2028.10.21-red.pdf

a. **Extract of Above - Policy S/NEC: North East Cambridge**

Link: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-10/First%20Proposals%20-%20FINAL%20FURTHER%20REVISED%2028.10.21-red.pdf

6) **Emerging Greater Cambridge Local Plan: Development Strategy Update (Regulation 18 Preferred Options)**

Adopted/Published: 2023
Author: Greater Cambridge Shared Planning
Link: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2023-01/PDGCLPDSUReg18POJan23v1Jan23.pdf

7) **Proposed Submission - North East Cambridge Area Action Plan - Regulation 19**

Adopted/Published: 2021
Author: Greater Cambridge Shared Planning
Link: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-11/NECAAPNorthEastCambridgeAreaActionPlanReg192020v22021.pdf

8) **Proposed Submission - North East Cambridge Area Action Plan - Policies Map - Regulation 19**

Adopted/Published: 2021
Author: Greater Cambridge Shared Planning
Link: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-11/NECAAPSDPoliciesMap202v22021.pdf

9) **Greater Cambridge Local Plan - Development Strategy Update report published 4 January 2023**

Adopted/Published: 2023
Author: Greater Cambridge Shared Planning
Link: https://www.greatercambridgeplanning.org/emerging-plans-and-guidance/greater-cambridge-local-plan/

10) **Regional Planning Guidance Note 6: Regional Planning Guidance for East Anglia to 2016 (RPG6) 2000**

Adopted/Published: 2000
Author: Government Office for the East of England
Link: https://files.cambridge.gov.uk/public/ldf/coredocs/RD-NP-131.pdf

11) **Cambridgeshire and Peterborough Structure Plan 2003**

Adopted/Published: 2003
Author: Cambridgeshire County Council and Peterborough City Council
Link: https://files.cambridge.gov.uk/public/ldf/coredocs/RD-AD-010.pdf

12) South Cambridgeshire Local Plan 2004

Adopted/Published: 2004
Author: South Cambridgeshire District Council
Link:

13) Cambridge Local Plan 2006

Adopted/Published: 2006
Author: Cambridge City Council
Link: https://www.cambridge.gov.uk/media/2667/local-plan-2006.pdf

14) Cambridge Local Plan 2006 – Inspector's Report

Adopted/Published: 2006
Author: The Planning Inspectorate
Link: https://www.cambridge.gov.uk/media/2670/local-plan-2006-inspectors-report.pdf

15) Cambridge Northern Fringe East - Viability of Planning Options

Adopted/Published: 2008
Author: R. Tym and Partners for Cambridge Horizons
Link: https://www.cambridge.gov.uk/media/2507/cambridge-northern-fringe-east-viability-of-planning-options-report.pdf

16) East of England Plan

Adopted/Published: 2008
Author: Government Office for the East of England
Link: https://www.ipswich.gov.uk/sites/default/files/pscd07_-_east_of_england_plan.pdf

17) South Cambridgeshire Site Specific Policies Development Plan Document

Adopted/Published: 2010
Author: South Cambridgeshire District Council
Link: https://www.scambs.gov.uk/media/6691/adopted-site-specific-policies-dpd.pdf

18) North East Cambridge Area Action Plan - Chronology of the feasibility investigations of redevelopment of the Cambridge Waste Water Treatment Plant

Adopted/Published: 2021

Author: Greater Cambridge Shared Planning
Link: https://democracy.cambridge.gov.uk/documents/s58066/App.%20I3%20-%20Chronology%20of%20feasibility%20investigations%20of%20redevelopment%20of%20the%20Cambridge%20Waste%20Water%20Tre.pdf

19) North East Cambridge Typologies Study and Development Capacity Assessment 2021

Adopted/Published: 2021
Author: Greater Cambridge Shared Planning
Link: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2022-01/NECAAPEBTypologiesStudyandDevelopmentCapacityAssessment2020v32021.pdf

20) Odour impact assessment for Cambridge Water Recycling Centre

Adopted/Published: 2018
Author: Odournet
Link: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-11/NECAAPEBOdourImpactAssessmentforCambridgeWaterRecyclingCentre2020v12021.pdf

a. Addendum Report; Updated Odour dispersion modelling for Cambridge Water Recycling Centre
Adopted/Published: 2020
Author: Olfasense UK (previously Odournet)
Link: https://www.cambridge.gov.uk/media/7335/cambridge-water-recycling-centre-odour-impact-assessment.pdf

Commented [CH1]: @Claire Shannon I can't make this link work, can you check it please

Commented [CS2R1]: Hi Caroline, yes that works

21) North East Cambridge Area Action Plan - Commercial Advice & Relocation Strategy

Adopted/Published: 2021
Author: GL Hearn
Link: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-12/NECAAPEBCommercialAdviceandRelocationStrategyDec21v2.pdf

22) Greater Cambridge Local Plan Development Strategy Options - Summary Report 2020

Adopted/Published: 2020
Author: Greater Cambridge Shared Planning

Link: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/gclp-development-strategy-options-summary-report-nov-2020.pdf

23) **Greater Cambridge Local Plan - Strategic spatial options appraisal: implications for carbon emissions , 19th November 2020**

Adopted/Published: 2020
Author: Bioregional
Link: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/gclp-strategic-spatial-options-assessment-implications-for-carbon-emissions-nov2020.pdf

24) **Greater Cambridge Local Plan Strategic Spatial Options Assessment - Sustainability Appraisal (November 2020)**

Adopted/Published: 2020
Author: LUC
Link: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/gclp-strategic-spatial-options-assessment-sustainability-appraisal-nov2020.pdf

25) **Greater Cambridge Local Plan: First Proposals - Development Strategy - Topic Paper 2021**

Adopted/Published: 2021
Author: Greater Cambridge Shared Planning
Link: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-11/TPStrategyAug21v3Nov21_0.pdf

26) **Greater Cambridge Local Plan Transport Evidence Report - Preferred Option Update**

Adopted/Published: 2021
Author: Cambridgeshire County Council
Link: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-10/Transport%20Evidence%20Report%20October%202021.pdf

27) **Greater Cambridge Local Plan: First Proposals: - Sustainability Appraisal Non-Technical Summary 2021**

Adopted/Published: 2021
Author: LUC
Link: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-11/GCLPSDSustainabilityAppraisalNonTechSummaryAug21v2Nov21.pdf

28) **Housing Delivery Study for Greater Cambridge 2021**

Adopted/Published: 2021
Author: AECOM and HDH Planning and Development
Link: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-10/Housing%20Delivery%20Study%20for%20Greater%20Cambridge%20%28AECOM%2C%20October%202021%29.pdf

29) Housing Delivery Study Addendum 2022

Adopted/Published: 2022
Author: AECOM
Link: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2023-01/EBGCLPDSUHDSAdmJan23v1Jan23.pdf

30) Anglian Water's Water Resources Management Plan 2019

Adopted/Published: 2019

Author: Anglian Water
Link: https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf

31) Greater Cambridge Integrated Water Management Study

Adopted/Published: 2021
Author: Stantec On behalf of Greater Cambridge Shared Planning
Link: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-09/Integrated%20Water%20Management%20Study%20-%20Outline%20Water%20Cycle%20Strategy%20%28Stantec%29.pdf

32) Cambridge Water draft Water Resources Management Plan (WRMP) 2024

Adopted/Published: 2023
Author: Cambridge Water
Link: https://www.cambridge-water.co.uk/media/3872/cam-draft-wrmp24-final-version.pdf

33) Anglian Water's draft Water Resources Management Plan (WRMP) 2024

Adopted/ Published: 2023
Author: Anglian Water
Link: https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp/rdwrmp24-main-report.pdf

34) Proposed Submission North East Cambridge Area Action Plan (Regulation 19) - Cabinet - 10 January 2022

Adopted/Published: 2022
Author: South Cambridgeshire District Council
Link:
https://scambs.moderngov.co.uk/ieListDocuments.aspx?CId=293&MId=9193&Ver=4

35) **Proposed Submission North East Cambridge Area Action Plan (Regulation 19) - Planning and Transport Scrutiny Committee 11th January, 2022**
Adopted/Published: 2022
Author: Cambridge City Council
Link:
https://democracy.cambridge.gov.uk/ieListDocuments.aspx?CId=475&MId=4128&Ver=4

36) **North East Cambridge In Principle Commitment to Delivery of the Area Action Plan - Strategy and Resources Scrutiny Committee -, 11th October 2021 5.00 pm**
Adopted/Published: 2021
Author: Cambridge City Council
Link:
https://democracy.cambridge.gov.uk/documents/s57012/In%20Principle%20Commitment%20to%20Delivery%20of%20NEC%20AAP%20SRS%20Cttee%2011%20Oct%202021.pdf

37) **North East Cambridge In Principle Commitment to Delivery of the Area Action Plan – Cabinet 19 October 2021**
Adopted/Published: 2021
Author: South Cambridgeshire District Council
Link:
https://scambs.moderngov.co.uk/ieListDocuments.aspx?CId=293&MId=9191&Ver=4

38) **Greater Cambridge Local Plan, Development Strategy Update - Planning and Transport Scrutiny Committee - 17th January 2023**
Adopted/Published: 2023
Author: Cambridge City Council
Link:
https://democracy.cambridge.gov.uk/ieListDocuments.aspx?CId=475&MId=4128&Ver=4

39) Greater Cambridge Local Plan, Development Strategy Update - Cabinet - 6 February 2023

Adopted/Published: 2023
Author: South Cambridgeshire District Council
Link: https://scambs.moderngov.co.uk/ieListDocuments.aspx?CId=293&MId=9490&Ver=4

40) Waterbeach Neighbourhood Plan 2022

Adopted/Published: 2022 (made)
Author: Waterbeach Neighbourhood Plan Group
Link: https://www.scambs.gov.uk/media/19884/waterbeach-np-made-version-march-2022-reduced-1.pdf

41) Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021

Adopted/Published: 2021
Author: Cambridgeshire County Council
Link: https://www.cambridgeshire.gov.uk/business/planning-and-development/planning-policy/adopted-minerals-and-waste-plan

42) Scoping Opinion - Proposed Cambridge Waste Water Treatment Plant Relocation

Adopted/Published: 2021
Author: The Planning Inspectorate
Link: https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/WW010003/WW010003-000028-WW010003%20-%20Scoping%20Opinion.pdf

43) Cambridgeshire Flood and Water Supplementary Planning Document

Adopted/Published:
Author: Cambridgeshire County Council (as the Lead Local Flood Authority) in conjunction with the other Cambridgeshire local planning authorities (including South Cambridgeshire District Council).
Link: https://www.scambs.gov.uk/media/3313/cambridgeshire_flood_and_water_spd_reduced_size_08-11-16.pdf

44) Greater Cambridge Biodiversity Supplementary Planning Document

Adopted/Published: 2022
Author: Greater Cambridge Shared Planning

Link: https://www.greatercambridgeplanning.org/media/2504/gcsp-biodiversity-spd-final-copy-march-2022-1.pdf

45) Greater Cambridge Sustainable Design and Construction Supplementary Planning Document

Adopted/Published: 2020
Author: Greater Cambridge Shared Planning
Link: https://www.cambridge.gov.uk/media/8157/greater-cambridge-sustainable-design-and-construction-spd.pdf

46) Greater Cambridge Landscape Character Assessment

Adopted/Published: 2021
Author: Chris Blandford Associates
Link: https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/LandscapeCharacterAssessment_GCLP_210831_Part_A.pdf

47) Land Contamination Risk Management (LCRM)

Adopted/Published: 2022
Author: Environment Agency
Link: https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm

48) National Character Area profiles

Adopted/Published: 2014
Author: Natural England
Link: https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles

49) Baits Bite Lock conservation area

Adopted/Published: 2006
Author: South Cambridgeshire District Council
Link: https://www.scambs.gov.uk/media/7373/baits-bite-lock.pdf

50) Cambridgeshire and Peterborough Integrated Care System (CPICS) Health Care Strategy

Adopted/Published: 2022
Author: Joint Cambridgeshire and Peterborough Health and Wellbeing Board/ Integrated Care Partnership

Link: https://www.cpics.org.uk/health-wellbeing-integrated-care-strategy#:~:text=As%20part%20of%20the%20strategy,better%20outcomes%20for%20our%20children