

# **South Cambridgeshire District 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**

20<sup>th</sup> November 2023



## Table of Contents

<b>1. Introduction.....</b>	<b>5</b>
<b>2. Scope.....</b>	<b>5</b>
Purpose and Structure of the LIR .....	6
<b>3. Description of the Development.....</b>	<b>7</b>
<b>4. Planning Policy.....</b>	<b>8</b>
National Planning Policy Framework 2023 .....	9
Local Development Plan Policies, Guidance and Supporting Evidence	10
Ministerial Statements .....	11
<b>5. Assessment of Likely Impacts .....</b>	<b>12</b>
<b>6. TOPIC 1 – Strategic Development Plan Context.....</b>	<b>12</b>
History of the North East Cambridge area.....	14
Extant Development Plan Context.....	19
Emerging Development Plan Context.....	20
Extent to which housing needs could be met without the relocation of the CWWTP .....	35
Progressing the emerging Development Plans .....	37
Significance of North East Cambridge to the Cambridge Economy.....	45
Government’s Cambridge 2040 initiative.....	45
Summary of the Planning Benefits of DCO Proposal .....	46
<b>7. TOPIC 2 - Green Belt Policy.....</b>	<b>48</b>
Very Special Circumstances.....	51
Compliance with Policy.....	53
<b>8. TOPIC 3 - Landscape.....</b>	<b>54</b>
Landscape Policy context.....	54
National Character Areas .....	55
Greater Cambridge Landscape Character Assessment .....	55
Site-based Character Assessment .....	56
Landscape and Visual Impact Assessment Overview .....	57
Compliance with Policy.....	64

<b>9.</b>	<b>TOPIC 4 - Historic Environment</b> .....	<b>65</b>
	Historic Environment Policy Context.....	65
	Heritage Asset Overview .....	67
	Compliance with Policy.....	73
<b>10.</b>	<b>TOPIC 5 - Carbon</b> .....	<b>74</b>
	Policy Context - Carbon.....	74
	Carbon Impact Overview .....	74
	Compliance with Policy.....	80
<b>11.</b>	<b>TOPIC 5 - Ecology and Biodiversity</b> .....	<b>80</b>
	Policy Context - Ecology and Biodiversity .....	80
	Ecology and Biodiversity Overview.....	81
	Compliance with Policy.....	83
<b>12.</b>	<b>TOPIC 6 - Land Quality and Contamination</b> .....	<b>83</b>
	Policy Context - Land Quality and Contamination .....	83
	Land Contamination Overview .....	84
	Compliance with Policy.....	87
<b>13.</b>	<b>TOPIC 7 - Odour Impacts</b> .....	<b>87</b>
	Odour impact overview.....	87
	Compliance with Policy.....	89
<b>14.</b>	<b>TOPIC 8 - Air Quality Impacts</b> .....	<b>89</b>
	Policy Context.....	89
	Air Quality Overview .....	90
	Compliance with Policy.....	92
<b>15.</b>	<b>TOPIC 9 - Noise and Vibration</b> .....	<b>92</b>
	Policy Context - Noise and Vibration .....	92
	Noise and Vibration Overview .....	92
	Compliance with Policy.....	96
<b>16.</b>	<b>TOPIC 10 - Lighting</b> .....	<b>96</b>
	Policy Context – Lighting .....	96
	Lighting Overview .....	97
	Compliance with Policy.....	99
<b>17.</b>	<b>TOPIC 11 - Public Health</b> .....	<b>99</b>

Policy Context - Public Health .....	99
Public Health Overview .....	100
Compliance with Policy.....	105
<b>18. TOPIC 12 - Community Impact .....</b>	<b>105</b>
Policy Context – Community .....	105
Compliance with Policy.....	108
<b>19. TOPIC 13 - Public Rights of Way .....</b>	<b>108</b>
Policy Context - Public Rights of Way .....	108
Public Rights of Way Overview.....	109
Compliance with Policy.....	111
<b>20. TOPIC 14 - Highways and Transportation .....</b>	<b>111</b>
Policy Context - Highways and Transportation .....	111
Highways and Transportation overview .....	112
Compliance with Policy.....	114
<b>21. TOPIC 15 - Climate Resilience.....</b>	<b>115</b>
Policy Context - Climate Resilience.....	115
Climate Resilience Overview .....	115
Compliance with Policy.....	120
<b>22. Conclusions .....</b>	<b>120</b>
<b>Glossary of Acronyms.....</b>	<b>123</b>
<b>Appendix 1 – Evidence Library.....</b>	<b>127</b>

## 1. Introduction

- 1.1 This report comprises the Local Impact Report (LIR) of South Cambridgeshire District Council (SCDC / the District Council) in its capacity as the local planning authority for part of the area covered by this application for a DCO.
- 1.2 The District 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 South Cambridgeshire District Council and Cambridge City 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 area of South Cambridgeshire District 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 District Council's assessment of the Proposed Development against the South Cambridgeshire Local Plan, taking into account relevant national policy, within this LIR it should be noted that

the District 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, such as in respect of Green Belt and heritage impact, would require a further assessment to be carried out against public benefits by the decision maker the District 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) [5.2.2, APP 034].
- 2.5 The District Council has noted the Examining Authority's written questions and requests for information (ExQ1) issued on 24 October 2023. The District 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 Cabinet for approval on 7<sup>th</sup> November 2023. The District 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 District 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 District 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 District Council;
- The positive, neutral and negative impacts of the development during the operational phase, as anticipated by the District Council;
- Where applicable, the positive, neutral and negative impacts of the development during the decommissioning phase, as anticipated by the District 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 District 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, Project Description (Doc Ref 5.2.2 [APP 034] however the District 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 Cambridge 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 Waste Water Treatment Plant (ReWWTP):** The site for the proposed ReWWTP is a greenfield site, located to the north-east of Cambridge and 2km to the east of the existing Cambridge

CWWTP. It is situated on arable farmland immediately north of the A14 and east of the B1047 Horningsea Road. It lies within the Cambridge Green Belt between the villages of Horningsea to the north, Stow cum Quy to the east and Fen Ditton to the south west. The A14 (a major trunk road that connects the North, the Midlands to the East of England) cuts through the landscape, rising to cross the River Cam over a bridge.

**3.4 The proposed final effluent discharge outfall on the River Cam:**

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

**3.5 The two new pipelines (rising mains) for the transfer of waste water to the proposed 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 West Anglian Mainline (WAML) railway and River Cam, east of Waterbeach. The route of the pipelines passes under Low Fen Drove Way and through the land required for 'main site' construction activities before passing under the A14.

**3.6 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 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 District 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 District Council's view not a matter for the LIR.
- 4.5 The District Council would however point out that under both s 104 and s 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 plan 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 District 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
  - Green Belt - NPPF Section 13
  - Climate Change - NPPF Section 14
  - Heritage - NPPF Section 16

### **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:

- South Cambridgeshire Local Plan 2018 [**Appendix 1, GCSP-1Appendix 1, GCSP-**]
- South Cambridgeshire Policies Map 2018 [**Appendix 1, GCSP-2Appendix 1, GCSP-**]
- Cambridge City Local Plan 2018 [**Appendix 1, GCSP-3Appendix 1, GCSP-**]
- Cambridge Policies Map 2018 [**Appendix 1, GCSP-4Appendix 1, GCSP-**]
- 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 District 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 District 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 District 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 Appendix 1, GCSP4**).
  - North East Cambridge – this is a wider area as identified in the Proposed Submission North East Cambridge Area Action Plan (NECAAP) [**Appendix 1, GCSP-Appendix 1, GCSP-7 and GCSP-8**] and emerging Greater Cambridge Local Plan First Proposals (Regulation 18 Preferred Options) (GCLP) [**Appendix 1, GCSP-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 and 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.
- 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.

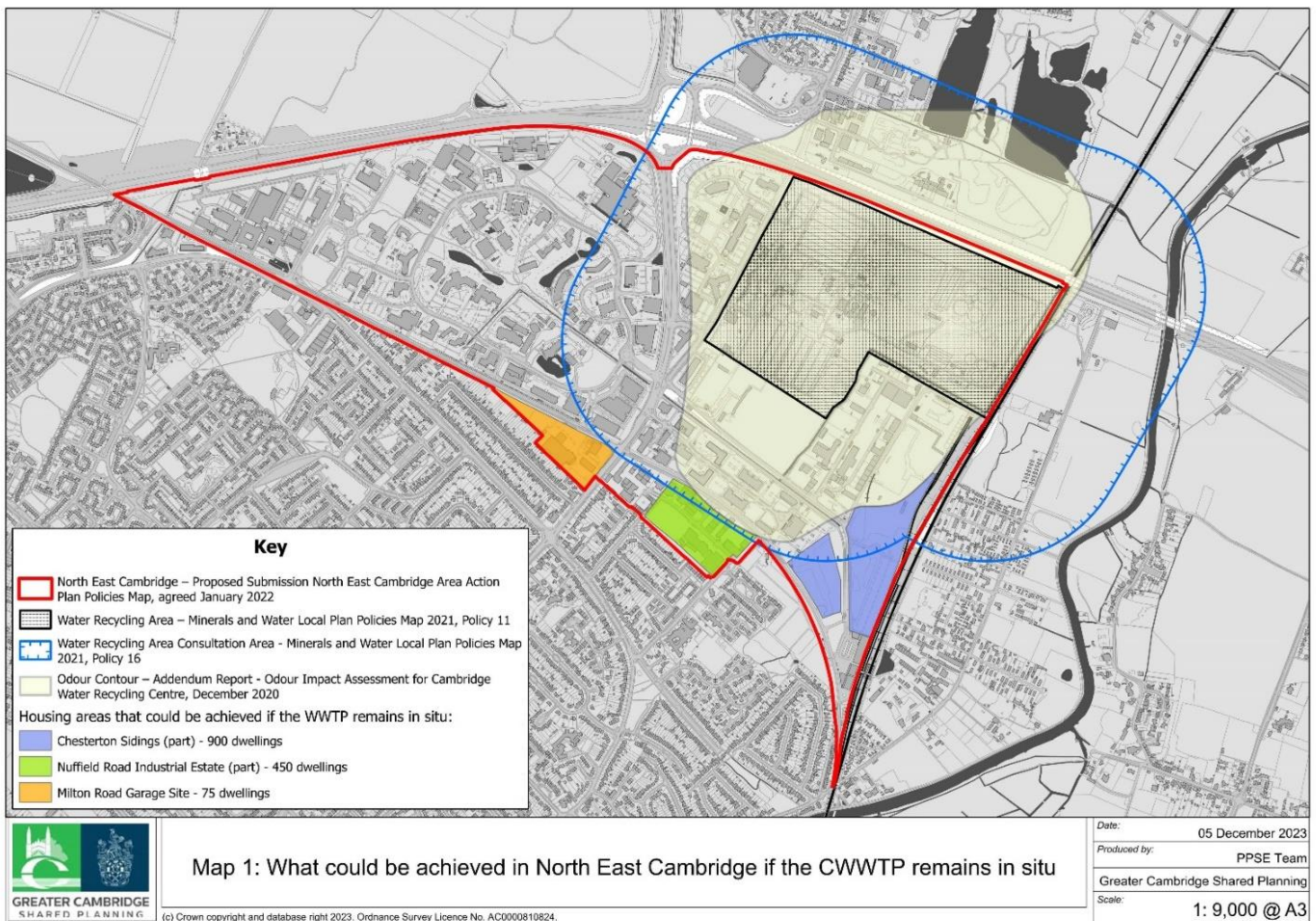
6.33 Policy 1 of the NECAAP [**Appendix 1, GCSP-7**], includes the following overarching allocation as follows:

- 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, 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  $6 \text{ ou}_E/\text{m}^3$  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 1 of the Addendum Report - Updated odour dispersion modelling for Cambridge Water Recycling Centre [**Appendix 1, GCSP-20a**] are for 2013 and were a worst-case scenario and cover a slightly 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.

6.35 Only three land parcels providing for residential development in the NECAAP lie outside the odour contours using Figure 1 from the 2020 updated Odour impact assessment as the worst-case scenario for what could take place with the CWWTP remaining in situ. The 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; 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 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 three parcels where housing could come forward outside the odour contours, totalling 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]



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 area is 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 be 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:
1. Densification of existing urban areas
  2. Edge of Cambridge: Non-Green Belt
  3. Edge of Cambridge: Green Belt
  4. Dispersal: New settlements (previously established and entirely new)
  5. Dispersal: villages
  6. Public Transport Corridors
  7. 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)
  8. 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-6 - 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 2032. 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, GCSP- 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 CWWPT 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, c. 1,100 dwellings proposed by the NECAAP for the sites surrounding the CWWTP would not be deliverable because of the odour impacts. Only sites located outside of the odour extents would be capable of supporting new residential development – this would amount to some 1,425 dwellings across NEC at most (see Map 1 above). 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 policies 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. SCDC is not part of any contract or agreement with Homes England and is not privy to the details. SCDC understands the grant to be 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 matter that is both important and relevant to 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 meet 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 continued 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 - Green Belt Policy



- 7.1 As set out above, the NPPF states at para 5 that its policies may amount to "other matters that are relevant" under the 2008 Act when considering a DCO proposal. In addition, the NPSWW (2012) at 4.8.10 recognises that:

*"general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances".*

- 7.2 The NPS goes on to state at [4.8.18] that when decision makers are considering waste water infrastructure projects which are located in the Green Belt and which amount to inappropriate development the:

*"decision maker will need to assess whether there are very special circumstances to justify inappropriate development. Very special circumstances will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In view of the presumption against inappropriate development, the decision maker will attach substantial weight to the harm to the Green Belt when considering any application for such development."*

- 7.3 The ReWWTP site is located in the Green Belt north of the A14 between Fen Ditton and Horningsea.

At a local level, Policy NH/8 of the South Cambridgeshire Local Plan 2018 [**Appendix 1 no.1**]: *Mitigating the Impact of Development In and Adjoining the Green Belt*, is relied upon for the assessment of proposals in the Green Belt. The area of Green Belt in South Cambridgeshire comprises 23,000 hectares covering over 25% of the district. This means much of the district is affected by Green Belt policies particularly around those villages surrounding Cambridge.

- 7.4 SCDC Local Plan Policy NH/8 requires that any development proposals within the Green Belt must be located and designed so as not have an adverse effect on the rural character and openness of the Green Belt. Where development is permitted, landscaping conditions, together with a requirement that any planting is adequately maintained, will be

attached to any planning permission to ensure that the impact on the Green Belt is mitigated.

- 7.5 The proposed ReWWTP constitutes “inappropriate development” in the Green Belt, as defined by the NPPF [para. 149]. In the view of the District Council, it would not meet any of the exceptions where new buildings in the Green Belt would not be defined as inappropriate development set out in paragraphs 149 and 150. The proposal is therefore, by definition, harmful to the Green Belt. A demonstration of very special circumstances would therefore be required.
- 7.6 The Applicant considers that a “number of the elements of the project... fall within the exceptions listed at paragraph 150 of the NPPF” [Doc ref.7.5.3][ APP-207]. This is on the basis that these elements “preserve the openness of the Green Belt and do not conflict with the purposes of including land in the Green Belt” (NPPF 151). The elements listed are “the transfer tunnels, proposed access roads to the ReWWTP and connecting infrastructure and the discharge point”.
- 7.7 The District Council accepts that the transfer tunnels, connecting infrastructure and the discharge points may have a limited impact on openness, as these are low-level engineering works within the site.
- 7.8 However, the Applicant submits that the access roads are “local transport infrastructure which can demonstrate a requirement for a Green Belt location” [Doc ref. 4.8.34] [APP-207]
- 7.9 The District Council considers that even if it were concluded that the access roads require a Green Belt location, the application would still need to satisfy the other part of the NPPF exception test which requires they “preserve its openness and do not conflict with the purposes of including land within [the Green Belt]” (NPPF paragraph 150).
- 7.10 The District Council considers that the access roads would have an urbanising effect on this Green Belt location cutting through into a field with a wide splay onto Horningsea Road. The District Council considers that significant land modelling to get the get the access road to the level of the existing field will be required thereby changing the character of this part of the site. In addition, the movement of vehicles within this part of the Green Belt previously devoid of such paraphernalia would have an impact on openness. As such, the access road would fail to meet the exception test (NPPF, paragraph 150).

7.11 The District Council therefore considers that the area of land required for the proposed ReWWTP, surrounding earth bank, visitors' car park, site access road constitute inappropriate development in the Green Belt. As such very special circumstances are required to outweigh the Green Belt harm as well as any other harm.

7.12 In respect of any other harm resulting from the proposal as required by national policy (NPPF paragraph 148) this LIR report addresses this in Topic 3 - Landscape, and Topic 4 - Heritage.

### **Very Special Circumstances**

7.13 The District Council considers that there are substantial benefits arising from the proposal that collectively can amount to very special circumstances<sup>1</sup>. However, it is for the ExA and ultimately the Secretary of State to determine the weight of those benefits against Green Belt harm as a result of inappropriateness as well as any other harm resulting from the proposal, that is identified.

7.14 The District Council considers the following benefits should be considered by the ExA in its determination of very special circumstances:

- The relocation of the CWWTP will facilitate the comprehensive development of the wider NEC area, optimising the development potential and enabling other knock-on benefits to the District to be realised as set out in Section 6 of this report.
- The release of the existing CWWTP site for redevelopment will also remove the existing constraints imposed by the Waste Water Treatment Safeguarding Area designation upon the site and surrounds in respect of any development on land within 400m of the existing CWWTP.
- The proposal would allow for the development and regeneration of the wider NEC area, including the existing CWWTP site, which has been identified through extensive assessment and evidence supporting the emerging joint Greater Cambridge Local Plan (Regulation 18) [**Appendix 1, GCSP- 5**] as the most sustainable

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<sup>1</sup> See *Wychavon DC v Secretary of State for Communities and Local Government* [2008] EWCA Civ 692

location in Greater Cambridge for development compared with other areas around Cambridge (see section 8).

- Evidence in support of the Draft Proposed Submission AAP (Regulation 19) [**Appendix 1, GCSP- 7**] shows the potential for the existing CWWTP site, once vacated together with neighbouring City Council owned land to accommodate c.5,500 net new mixed tenure homes (including affordable homes). The proposal and by removing environmental constraints, would enable up to a further c.2,850 net new mixed tenure homes on surrounding sites in close proximity to existing and planned jobs.
- Alongside the provision of substantial numbers of housing units, the ability to redevelop the vacated CWWTP site also offers the opportunity to deliver further beneficial commercial floorspace and a range of town centre uses, as well as social and physical infrastructure that will support the area's continued growth as a strategically important economic driver for Greater Cambridge and create a vibrant new urban quarter to Cambridge.

#### 7.15 In addition to the housing benefits

- The design of the ReWWTP allows for future expansion of operations if required to accommodate anticipated flows into the early 2100s.
- The new plant would be designed to minimise its carbon emissions, through both construction and operation phases.
- The flexibility provided through the DCO would allow for further opportunities to improve the efficiency of the design and reduce carbon emissions further through water technology innovations.
- The proposed new plant would be better able to maximise energy recovery than the current facility such as through the generation of biogas, and when processed this can be used to heat the homes of the local community as a renewable fuel source.
- The proposed new plant would better be able to address the impacts of climate change than the current facility, in particular, it would be able to counter the impact of the occurrence of more

frequent and extreme storm events, through its capacity to treat a greater volume of storm flows, and to a higher standard than would be the case at the existing facility.

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

### **Compliance with Policy**

- 7.16 The proposed development amounts to inappropriate development in the Green Belt applying the relevant parts of the NPPF.
- 7.17 Policy NH/8 of the South Cambridgeshire Local Plan 2018 sets out that any development proposals within the Green Belt must be located and designed so that they do not have an adverse effect on the rural character and openness of the Green Belt.
- 7.18 The proposal would have an adverse effect on the rural character and openness of the Green Belt for the reasons set out above.
- 7.19 In terms of very special circumstances the District Council has set out what it considers are the benefits of the proposal which collectively

amount to such, and which are capable of outweighing Green Belt harm and any other harm.

- 7.20 The District Council considers the requirements of NH/8 which requires suitable mitigating measures to be included to ensure that the impact on the Green Belt is mitigated, could be met through the application and management of a robust landscape strategy.

## 8. TOPIC 3 - Landscape

### Landscape Policy context

- 8.1 Policy NH/2 of the South Cambridgeshire District Council Local Plan (herein referred to as the “SCDC Local Plan”) requires that development be permitted where it respects and retains or enhances the local character and distinctiveness of the local landscape and of the individual National Character Area [**Appendix 1, GCSP- 48**] in which is it located.

### Landscape Design

- 8.2 Landscape design response proposes a significant rotunda feature within the local landscape. It is considered that the circular forms are inconsistent with the Fen Edge/Chalklands character areas and agricultural landscape of the surrounding area and that an alternative earthwork, which retained a more linear form, would have been more aligned with the existing landscape character.
- 8.3 Notwithstanding concerns with the Rotunda concept, the subsequent soft landscape proposals give rise to the following secondary landscape concerns.
- 8.4 The proposals also rely on tree planting atop the rotunda earthwork to provide significant visual mitigation. However, it is considered that due to the dryness of the local area, tree planting atop an earthwork would struggle to survive without consistent watering throughout their lives, not just at establishment. This approach would therefore require water to be used for irrigation throughout the life of the facility. Tree planting should be focused at the base of the bund, at the edges of the site and in the wider study area, closer to receptors such as at the southern village edge to Horningsea. The Applicant has provided additional tree

planting, through discussions with the District Council at these key areas but also retains the tree planting at the top of the earthworks.

- 8.5 The landscape design also proposes large blocks of woodland broken up by straight gaps [which the District Council will refer to as 'rides' for the purposes of this report] but which are straight gaps between woodland blocks intended to allow meadow grassland to grow and to break up the woodland into groupings which aspire to be more characteristic of the Character Area of the site.
- 8.6 Discussions with the District Council led to the inclusion of the rides but it is considered that they, as presented, are not wide enough to fully achieve their intended purpose of breaking up the woodland into more characteristic plantation blocks.

### **National Character Areas**

- 8.7 The site of the ReWWTP lies at the convergence of three National Character Areas; The Fens, East Anglian Chalk, and Bedfordshire and Cambridgeshire Claylands [**Appendix 1, GCSP- 48**].
- 8.8 For the most part, the site reflects primarily Fen and Chalk characteristics including presence of field drainage systems, sparse woodland cover, remnant chalk grasslands, and a strong association with prehistoric, Anglo-Saxon and Roman features such as nearby Devil's Dyke, Fleam Dyke and Worsted Street Roman Road. It shares fewer characteristics with the Claylands which are more open, gently rolling and feature more woodland cover, though scattered.

### **Greater Cambridge Landscape Character Assessment**

- 8.9 The Councils commissioned a district-wide character study, the Greater Cambridge Landscape Character Assessment 2021 (GCLCA) [**Appendix 1, GCSP-46**] which forms part of the evidence base for the preparation of the emerging Greater Cambridge Local Plan. The assessment assigns a Landscape Character Type (LCT) which is then broken down to Landscape Character Areas (LCA). The site aligns with *Landscape Character Type 6: Fen Edge Chalklands* and *Landscape Character Area 6A: Fen Ditton Fen Edge Chalklands*.

- 8.10 Characteristics of both the LCT and the LCA feature strongly within the ReWWTP site, particularly the arable landscape with limited woodland cover, hawthorn hedges and ditch boundaries and the urban influences of Cambridge and transport infrastructure which are nearby. The LCT identifies key landscape features which include ‘Significant Anglo-Saxon earthworks at Fleam Dyke, with links to others in the wider area’.
- 8.11 The LCT and LCA further identify landscape sensitivities to change, outlining what the main drivers of that change may be. Relevant to this site are primarily ‘*ad hoc woodland and shelterbelt planting that would alter the open character of the landscape*’ [GCLCA page 60] and ‘*historic, linear drains and ditches including the Fleam Dyke*’ [GCLCA page 127].
- 8.12 The LCT and LCA offer guidelines for enhancing the LCT and LCA and relevant to this site include ‘conserve and enhance the regular small-scale pastoral fields, shelter belts and hedges at village edges’ and ‘ensure development is in keeping with the open, rural character’.
- 8.13 The Applicant has not incorporated the GCLCA recommendations and sensitivities into their assessment within the LVIA which would have been beneficial in order to identify Landscape Sensitivities and Guidelines which apply to the development. The GCLCA typologies are not so broad that they are irrelevant to the design of the development as identified above.

### **Site-based Character Assessment**

- 8.14 The Applicant has appraised the landscape and applied Landscape Character definitions based on site surveys and desk-based review. The local character areas defined are accepted and found to be generally aligned with the GCLCA notwithstanding that it has not been referenced.
- 8.15 Key to the assessment of the landscape character of the ReWWTP’s site are the Eastern Fen Edge LCA, Wester Fen Edge LCA and the River Cam Corridor LCA. The Applicant has attributed a medium value to the site’s landscape character [Doc ref. 5.2.15; Table 3-1] [APP-047]. The District Council considers that this value is appropriate given



the presence of intervening features including the highway infrastructure of the A14.

- 8.16 The proposal would have a permanent impact on the local landscape affecting many of the characteristics and sensitivities mentioned within the GCLCA. The proposed rotunda design for the site is not consistent with the strong linear features identified within the LCAs identified. In the District Councils view, alternative designs which may have been less impactful should have been considered.
- 8.17 The proposal's landscape planting design also has a role in altering the landscape characteristics. The inclusion of significant swathes of woodland is inconsistent with the specific landscape characteristics of the area. Such tree belts are unfamiliar within this landscape. It is however noted that the rationale for the extensive woodland type cover is to function as mitigation for views into the site and to mitigate the visual impact that the rotunda bund has on the wider area.

### **Landscape and Visual Impact Assessment Overview**

- 8.18 A Landscape and Visual Impact Assessment (LVIA) [Doc Ref: 5.2.15] [AS-034] was scoped into and completed as part of the Environmental Impact Assessment. The purpose of an LVIA is to take a standardised approach to assessing the impact of the development on landscape and visual receptors. The resulting findings can then be used to inform the design from concept through to detailed design.
- 8.19 The District Council has the following comments to make in respect of the methodology that has been used for the LVIA.
- 8.20 It should be noted that the language used within the assessment findings is not in accordance with the guidance set out in the Guidelines for Landscape and Visual Impact Assessment, 3<sup>rd</sup> Edition. Primarily, this is related to the use of the word 'large' in place of 'major' and the use of 'slight' in place of 'minor' throughout. For the purposes of this report, the District Council will assume use of the prescribed terms of major and minor.
- 8.21 Table 2-6 of the Landscape and Visual Amenity Chapter [Doc Ref: 5.2.15] [AS-034] identifies the maximum heights of the various elements proposed. However, these are expressed as Above Finish

Ground Level (AFGL), which then allow for a tolerance of 2m. This leads to a degree of ambiguity as it is not clear if the assumption is that the maximum height referred to is AFGL + 2m or where AFGL is located in relation to Existing levels or AOD. The District Council requests that heights be expressed as AOD to ensure the accuracy of photomontages provided.

- 8.22 The LVIA [Doc Ref 5.2.15] [AS-034] viewpoints for the Visual Impact Assessment were discussed between the Applicant, and all interested parties, including the District Council. Other elements of the baseline assessment are accepted.
- 8.23 The assessment of Cumulative Effects identified no effects. No major applications in the vicinity, when combined with the proposals additionally affect the impact of the development on landscape or visual receptors at any phase either positively or negatively.
- 8.24 The LVIA [Doc Ref 5.2.15] [AS-034] identifies potential for several Significant Moderate and Major (Large) Adverse landscape and visual effects during the construction phase and the operational phase.
- 8.25 A decommissioning assessment was completed on the existing CWWTP at Cowley Road but no change is proposed therefore the baseline is unchanged. However, no assessment of the potential impacts of decommissioning of the new facility has been provided. It is advised within the Project Description the lifespan is expected to extend beyond 70 years and therefore impacts can be considered permanent and irreversible [Doc.Ref.5.2.2. para 2.12.5] [APP-034].

#### *Construction Positive Landscape Impacts*

- 8.26 The District Council considers that there are no positive impacts resulting from the development during construction.

#### *Construction Neutral Landscape Impacts*

- 8.27 The District Council considers that during the construction stage of the development, the advance planting works along Fen Drove Way and Horningsea Road will have such a minor to negligible effect due to the immaturity of the planting that the overall effect is considered to be neutral.

- 8.28 The temporary features such as hoardings and other fencing and features incorporated to reduce impact of views will not improve views by any measurable quantity, but neither would they worsen the overall impacts of the development. The overall effect is therefore considered to be neutral. This may be improved through a requirement which aims to improve the quality of the hoardings over the lifespan of the construction phase.
- 8.29 Of the views assessed as part of the LVIA [Doc Ref 5.2.15] [AS-034], 11 views were considered to have a neutral impact from the proposals as noted in [Doc. Ref. 5.2.15, table 4-2] [AS-034]. These were exclusively distant or well screened views which are not part of/or only apply to a limited part of the application site. These views are considered to be of neutral impact.

#### *Construction Negative Landscape Impacts*

- 8.30 The District Council considers that the construction of the earth bund (earth bank) and the creation of the habitat areas will initially have a negative impact due primarily to the bare earth effect of construction, visibility of the works as well as the immaturity of any advance planting or planting completed during or at the end of the construction stage.
- 8.31 The District Council notes that the proposed earthwork is to be constructed out of soils gained from the excavations of the proposal site and the trenching for effluent and transfer pipeline excavations. Neither the Landscape and Ecological and Recreational Management Plan (LERMP) [Doc Ref. 5.4.8.14] [AS-066] nor the LVIA [Doc Ref 5.2.15] [AS-034] state whether this soil will be tested for appropriateness for the type of use proposed, particularly the planting. It should be noted that the bunds have a two-fold purpose. In one instance they are engineered to withstand erosion and in the other, the soils must be loose enough to allow planting to establish and thrive. These two states do not always work together well and require different soil make ups. A soil strategy for the construction of the bunds which includes testing for appropriateness, methodology for construction and methodology for topsoiling, cultivation and planting is required.

- 8.32 General experience of other earthwork features, such as Devil's Dyke or Fleam Dyke, leads to the District Council's view that planting atop bunds is likely to be unsustainable and to require a level of maintenance which may conflict with biodiversity and sustainability goals. This planting will have little effect in screening or softening the proposals for a number of years and the District Council is concerned that the any landscaping may fail to establish without considerable management. Supplemental watering will likely be needed to ensure the trees at the top of the bund survive, but even once established, continual checks of water availability for the trees will be needed. The LERMP [Doc Ref. 5.4.8.14] [AS-066] could be used to ensure watering is a long-term maintenance task for achieving success, however, this is not currently the case with the document.

#### *Mitigation Measures*

- 8.33 Mitigation opportunities to reduce the impact of the proposals are classified into three categories which are primary, secondary and tertiary measures. There are also temporary measures identified in the ES [Doc Ref. 5.2.15] [AS-034]. Primary and tertiary measures are embedded within the design of the proposals, such as, planting, the earth bunds and materiality. Secondary measures are applied to the proposals over time and are separate to the physical elements of the landscape such as Code of Practice agreements and Maintenance and Management Plans.
- 8.34 Grasses and other landscape planting will be achieved only towards the very end of the construction phase and will require a minimum of one year to establish (grasses/meadows) to 3-5 years to establish (trees/hedges). Establishment is not the same as maturity and established trees and hedges will only provide a negligible screening effect in those first years.
- 8.35 Additionally, during construction significant portions of existing landscape will be removed to aid in construction including trees, hedges, grasses, topsoil etc. which will potentially make the site more visible and more noticeable against the adjacent undisturbed landscapes.
- 8.36 It should be noted that in the instance of landscaping, the construction period includes one to two years of post-construction establishment

during which much of the landscape will establish but not necessarily gain much maturity. This will be particularly noticeable in trees. However, areas of grasslands and meadows will look reasonably mature within this time frame. It is understood that during the first year or two of the operation of the facility, the landscape will still ultimately be in a construction/establishment phase.

#### *Operational Positive Landscape Impacts*

- 8.37 The landscaping will provide a positive level of screening as well as a wide variety of habitats upon maturity. It must be noted however, that the screening is not able to or expected to be full, but only partial and the taller elements of the buildings will still be able to be seen clearly from a majority of the viewpoints. Assuming the landscape is well maintained during this period, the landscape will be able to provide a positive level of mitigation during the lifetime of the development, however, the development will remain partially visible in the landscape.

#### *Operational Neutral Landscape Impacts*

- 8.38 The District Council considers that the proposed landscape planting achieved at the early stage both pre-construction and during construction will have an improving effect on the proposals but will not achieve full screening of the proposals.
- 8.39 At Year 1, mitigation measures are likely to have a negligible effect due to the immaturity of the planting.
- 8.40 At year 15, mitigation measures are likely to provide a positive level of improvement as illustrated by the Applicant but will not completely screen or remove the overall impacts of the development on the surrounding Landscape and Visual receptors ES [Doc Ref. 5.2.15] [AS-034].
- 8.41 The mitigation proposals include the creation of significant areas of woodland to aid in screening and are both positive (due to screening and softening effect) and negative (due to conflict with LCA).

#### *Operational Negative Landscape Impacts*

- 8.42 It must be noted that many of the *Construction Negative Impacts* ultimately apply to the *Operational Negative Impacts* due to the continually changing nature of landscape planting. As the landscape matures, its ability to screen the proposed development improves, but also increases the divergence from the landscape character of this rural location.
- 8.43 As mentioned in the construction impacts, the planting atop the bund will need continual maintenance and management to survive. It should be noted that the majority of other bund features in the region such as Devil's Dyke and Fleam Dyke do not have trees associated with them, and neither are they as tall.
- 8.44 East Anglia is the driest region in the UK and trees atop the proposed earthworks will potentially fail without significant management measures during their lifetime. It is considered that this is not a sustainable design element, given the water concerns in the region.
- 8.45 The District Council considers that the successful implementation of the LERMP [Doc Ref. 5.4.8.14] [AS-066] particularly in relation to planting on the bund may be unsustainable and therefore unsuccessful in the future.
- 8.46 Consideration should therefore be given to alternative measures identified which can be employed should the trees and vegetation in this location fail to thrive. This could be addressed through a landscape and mitigation management strategy.
- 8.47 The open 'rides' between sections of woodland as shown in the Illustrative Masterplan within the LERMP [Doc Ref. 5.4.8.14] [AS-066] should be wider in the District Council's view to ensure the woodlands read as separate sections with open meadow rides between them [Doc. Ref. 5.4.8.14, Fig 3.1] [AS-066]. The purpose of the straight and wider rides is to draw on the linear characteristics of the local character area descriptions and opportunities. It will also reduce the woodland element to more discreet clusters without limiting the trees' ability to screen the development. This is achieved by targeting the views from the proposed rides away from the bund.

*Landscape, Ecology, Recreation Management Plan*

- 8.48 There are several inconsistencies within the Landscape, Ecology, Recreation Management Plan LERP [Doc Ref. 5.4.8.14] [AS-066] that require clarification and it is noted that some information is missing. These matters are set out below:
- 8.49 Two aspects of Figure 3.13 are considered to require amendment.
- There are two key items for Proposed New Bridleway. One in colour cyan and one in a dark red. The cyan line does not appear in the drawing. Clarification is required as to whether this is an error or whether there is another proposed bridleway elsewhere that differs in some way from the other one.
  - Boxed text on drawing states 'Access to Anglesey Abbey and Stow cum Quy via the new bridleway'. This should also say 'by foot only' Bridleway/cycle access to Anglesey Abbey is not part of the PROW network
- 8.50 Section 4 [Doc Ref. 5.4.8.14] [AS-066] is difficult to understand. It is considered that the division of 1) Creation, 2) Management and Maintenance do not outline clear elements for maintenance and management. The District Council queries whether 'Creation' should be named 'Establishment' and outline the requirements for establishing landscape areas and for the second section to outline requirements for ongoing maintenance beyond establishment. Tables (4.1 and 4.2) associated with Section 4 [Doc Ref. 5.4.8.14] [AS-066] appear to serve two roles, one is outlining management and maintenance actions and the other is to identify elements of timing or phasing of construction. It would be clearer if the phasing elements were removed and the tables listing only the maintenance requirements, frequencies and durations. For example, mowing of grass: mow to 50mm cut, remove arisings, 13x per year, April to September.
- 8.51 Elements identified in Table 4.1 and 4.2 as 'commencing before construction' or other phasing attributes should be removed to another section which clarifies only those tasks which are to be phased. This may not be specifically a tabular format and may be more suited to a descriptive format. The use of 'not applicable' to so many of the standard maintenance task suggests they do not need to be actioned at any time and this is misleading.

- 8.52 The LERMP [Doc Ref. 5.4.8.14] [AS-066] does not provide sufficient clarity to ensure that maintenance activities would be adequately implemented. Areas of tree planting are not differentiated from each other, and all areas of 'trees, shrubs and hedgerows' are treated equally.
- 8.53 The landscape areas are not consistent in their naming on Figure 3.1 - Landscape Masterplan of the LERMP or with Figure 3.9 - Proposed Habitat Areas of the LERMP. It is important to identify which task apply to which areas, and this has not been achieved. Areas of inconsistency include 'Tree, Hedgerow and Shrub Planting', 'Screen planting' and 'Low Maintenance Flowering Lawn'
- 8.54 The LERMP [Doc Ref. 5.4.8.14] [AS-066] refers to a Soft Landscape Specification which appears to be missing from the submission.

#### Requirements - Landscape

- 8.55 In light of the above, the District Council considers that the following measure should be put forward as DCO requirements in themselves or part of a requirement:
- Soil strategy plan for the soils on site and for the construction and subsequent planting of the bunds
  - Wider rides within the woodland blocks around perimeter of the proposal area.
  - Review and assessment of impacts on the GCLCA within the LVIA
  - Review and standardisation of language within the LVIA (Major, moderate, minor, negligible)
  - Clarification of the AFGL/AOD to ensure that heights of the envelope of the proposals are fully understood.
  - Review and amendment of the LERMP to ensure maintenance of the landscape is able to be actioned with clarity.

#### **Compliance with Policy**

- 8.56 The District Council considers the approach of the proposed development would conflict with the aim of SCDC Local Plan Policy



NH/2 to respect, retain and enhance local character and the distinctiveness of the national character area in which it is located.

- 8.57 This is in simple terms because the existing site is an open field. The proposals impose a large round feature which is not characteristic of the NCA and it also imposes significantly more woodland than is characteristic of the NCA and it is not clear how consistent the mitigation measures proposed including the retention of the meadow as a 'ridge and furrow' is consistent with the history of this landscape.
- 8.58 The District Council considers that further clarification and measures are needed as set out.

## **9. Topic 4 - Historic Environment**

### **Historic Environment Policy Context**

- 9.1 The relevant development plan policies that apply to the impact of development on the historic environment is SCDC Local Plan Policy NH/14.
- 9.2 The policy requires that:
- Development should sustain and enhance the special character and distinctiveness of the district's historic environment including its villages and countryside and its building traditions and details.
  - Development should create new high-quality environments with a strong sense of place by responding to local heritage character including in innovative ways.
  - Development proposals will be supported when they sustain and enhance the significance of heritage assets, including their settings, as appropriate to their significance and in accordance with the National Planning Policy Framework.
- 9.3 In addition, the NPPF at para 202 provides:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be

weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use,

- 9.4 The NPSWW (2012) section 4.10 addresses the Historic Environment and how decision makers under the Planning Act 2008 should approach the impact of new waste water infrastructure on heritage assets and the wider historic environment. It largely reflects the NPPF (which superseded PPS5 Planning for the Historic Environment: Historic Environment Planning Practice Guide, March 2010, referred to within the NPS at footnote 110). The NPS at 4.10.10 also confirms that the “decision maker should have regard to any relevant local authority development plans or local impact report on the proposed development in respect of the factors” now set out in the NPPF.

### ES Assessment

- 9.5 Paragraph 2.2.15 of the Historic Environment Chapter of the ES [Doc. Ref.5.2.13] [APP-045] states that:

*“This assessment is formed by an understanding of the NPPF which refers to impacts amounting to degree of harm to the significance of any Heritage Asset. This can be less than substantial harm (predominantly associated with impacts on setting), substantial harm (predominantly associated with physical impacts to the asset) or total loss (also classed as substantial harm)”.*

- 9.6 The District Council considers that this statement is not accurate as paragraph 200 of the NPPF states:

*“any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of assets of the highest significance, notably scheduled ancient monuments, protected battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens and World Heritage sites, should be wholly exceptional.” [emphasis added]*

- 9.7 This means therefore that substantial harm can arise from development within the setting of a heritage asset. It is also possible to have less than substantial harm arising from a direct impact on physical assets.

## Heritage Asset Overview

- 9.8 The following section of the Local Impact Report considers the relevant heritage assets in more detail.
- 9.9 Baits Bite Lock Conservation Area (HE095) [**Appendix 1, GCSP-49**] contains land required for the proposed wastewater transfer tunnel and outfall to the river Cam. The area is characterised by water meadows and flat fenland now in agricultural use with the 19<sup>th</sup> century canal lock at its centre. The area contains two listed buildings, Wildfowl Cottage (HE035) listed Grade II and Biggin Abbey (HE011) listed Grade II\*. The flat Fenland with scattered trees characterises the open countryside surrounding the conservation area which means that views to the east from the river, especially Biggin Abbey is very prominent. The area is significant due to the architectural and historical interest of the buildings within it and the evidence of the transport history of the river Cam from 1700 when the lock was constructed.
- 9.10 Poplar Hall (HE040) lies 900m south-west of the proposed ReWWTP and is most impacted by temporary activities associated with the tunnelling of the wastewater transfer tunnel. Poplar Hall is listed Grade II and is a 17<sup>th</sup> century timber framed farmhouse. Its high heritage value is due to its architectural and historic interest derived from its form and fabric and continued use as a farmhouse.
- 9.11 Biggin Abbey (HE094). Listed Grade II\* it is a 14<sup>th</sup> century farmhouse with 17<sup>th</sup> century additions once the residence of the Bishops of Ely and visited by Henry III, Edward I and Edward II. Its high heritage value is due to its surviving historic fabric and association with the Bishops of Ely. It is surrounded by arable fields across which it has long views. Its agricultural setting is a key element of the assets value as it facilitates understanding of the building's historic relationship with the surrounding farmland.

### *Construction Temporary and Permanent - Positive Impacts*

- 9.12 The District Council agrees with the methodology that has been used for the assessment of heritage assets. It is noted that there are no positive impacts arising from the proposed development highlighted.

### *Construction Temporary and Permanent - Neutral Impacts*

- 9.13 The Environmental Statement [Historic Environment Chapter of the ES [Doc. Ref.5.2.13] [APP-045] identifies a range of impacts on the identified built heritage and historic landscape assets from both temporary and permanent construction. The District Council considers that there are no neutral construction impacts.

*Temporary Construction Historic Environment Impacts*

- 9.14 Paragraph 4.2.11 [Doc. Ref.5.2.13] [APP-045] states that there will be a temporary change in the character of the conservation area due to the presence of the construction compound and from construction activity associated with the final effluent pipeline and the outfall to the river Cam. The light, noise and visual intrusion from the presence of machinery and activity in the compounds will temporarily alter the character of the conservation area and its setting. This would result in a temporary moderate adverse impact to the conservation area. The District Council agrees with this assessment of degree of impact.
- 9.15 Paragraph 4.2.12 [Doc. Ref.5.2.13] [APP-045] highlights the presence of a construction compound and construction activities 110m south of the Biggin Abbey, a Grade II\* building, which would introduce additional noise, presence of machinery and light pollution into the assets' setting. This is highlighted in the above report as altering the ability to appreciate the rural agricultural character of the assets' setting and would result in a temporary minor adverse impact on its heritage value.
- 9.16 It is noted that Table 2-2 [Doc. Ref.5.2.13] [APP-045] states that this equates to a small change in the assets setting. The District Council considers that given the period of construction is likely to take up to four years, this assessment does not adequately reflect the level of impact on this Heritage Asset of high heritage value and an impact assessment of temporary moderate adverse effect would better reflect the impact.

*Temporary Construction Mitigation - Historic Environment*

- 9.17 The temporary construction effects upon Baits Bite Lock have been identified as introducing noise, light and visual intrusion which will temporarily alter the character of the surrounding rural farmland. The effects for Biggin Abbey will be the presence of the construction

compound and activities during construction of the effluent pipeline and outfall and construction activities associated with the proposed ReWWTP which will temporarily alter the ability to appreciate the character of the assets setting resulting in a temporary minor adverse impact.

- 9.18 The significance of these effects to Baits Bite Lock Conservation Area, Biggin Abbey and Poplar Hall have been identified as medium term temporary and reversible moderate adverse effects which is significant.
- 9.19 The report identifies in Section 4.2.19 mitigation measures such as screening of site compounds with solid site hoardings to reduce noise, light and visual intrusion, and monitoring of noise and vibration levels. These measures are identified as reducing the impact on Baits Bite Lock conservation area from temporary moderate adverse to temporary minor adverse.
- 9.20 There are no mitigation measures suggested to reduce the impact of construction on Biggin Abbey or Poplar Hall and so the impact remains moderate to adverse which is significant. It is concerning that no mitigation is proposed for Biggin Abbey and Poplar Hall and that these significant moderate adverse effects will potentially erode the setting of these heritage assets for up to four years. The use of hoardings is put forward as part of the mitigation of impact on Baits Bite Lock conservation area however the hoardings themselves will have a significant impact on the setting of heritage assets. The provision of a detailed strategy providing visuals of the hoardings and when and where they will be located would provide clarity on that impact.

#### *Permanent Construction Historic Environment Impacts*

- 9.21 The ES [Doc. Ref.5.2.13] [AS-030] assesses Baits Bite Lock as having medium heritage value and the Grade II\* listed Biggin Abbey as having high heritage value. The District Council agrees with this assessment.
- 9.22 Paragraph 4.2.42 [Doc. Ref.5.2.13] [AS-030] states that Baits Bite Lock Conservation Area would experience an impact from the presence of permanent structures associated with the project including a permanent, physical impact due to the construction of riverbank protection works and a new outfall structure. The introduction of built

infrastructure into a more organic stretch of riverbank would alter the character of the Conservation Area.

- 9.23 Paragraph 4.2.43 [Doc. Ref.5.2.13] [AS-030] goes on to say that there would be a change within the setting of Baits Bite Lock Conservation Area (HE095) from the introduction of the proposed ReWWTP into the landscape approximately 850m beyond Biggin Abbey. The tallest elements of the proposed ReWWTP would be approximately 1km to its east. Although most key views within the conservation area are focused on the Cam itself, the Conservation Area Appraisal notes an important view eastward encompassing Biggin Abbey. The introduction of the Proposed Development in land east of the asset, would slightly detract from its prominence in these eastward views. Furthermore, the agricultural land surrounding the conservation area, which contributes to its rural character, would be altered by the Proposed Development.
- 9.24 Paragraph 4.2.44 states that the Proposed Development will introduce planting which will alter the character of what is presently large fields with minimal planting outside of hedgerows. reduce the openness of views over the landscape in this location. The presence of the earth bank and planting will truncate views, altering the largely flat, agricultural fenland character of the existing landscape.
- 9.25 The overall assessment of impact to the character and setting of Baits Bite Lock Conservation area is assessed at paragraph 4.2.44 as a permanent minor adverse impact. The District Council does not consider that this level of impact represents the level of change which will result from the permanent development of the proposed WWTP. The level of change should be assessed as moderate as per the impact magnitude criteria at Table 2-2 and the impact on a heritage asset of medium value should be moderate as defined by the significance matrix at Table 2-3.
- 9.26 Paragraph 4.2.45 [Doc. Ref.5.2.13] [AS-030] states that there will be a permanent impact on the heritage value of Biggin Abbey as a result of changes within its setting from the proposed development.
- 9.27 The introduction of the proposed ReWWTP will alter the agricultural character of the surrounding farmland which is identified in para 4.2.6 [Doc. Ref.5.2.13] [APP-045] as contributing to an understanding of Biggin Abbey's role as part of the rural agricultural manor of the

Bishops of Ely and enables the asset to be understood in its historic context of rural fen - edge farmland.

- 9.28 Paragraph 4.2.45 [Doc. Ref.5.2.13] [AS-030] acknowledges that the proposed landscape planting and earth bank will reduce the visual intrusion of the proposed ReWWTP, but that these elements themselves will truncate views eastwards from Biggin Abbey and fundamentally alter the Fen - edge farmland character of its setting. This has been assessed as a permanent minor adverse impact. The District Council does not consider this assessment to be a full reflection of the impact on an asset assessed as high value. Given the level of change to the setting the impact assessment using the criteria of Table 2-3 should be a permanent **moderate** or **large adverse impact**.
- 9.29 Paragraph 4.2.46 [Doc. Ref.5.2.13] [AS-030] states that alterations to Horningsea Road will further urbanise the historic route through the landscape and create further severance between Biggin Abbey and the landscape to the east which is assessed to reduce the ability to view the asset's historic connection with the wider agricultural landscape and understand its historical context as a rural retreat. This impact is assessed as **minor adverse**. It is the view of the District Council that the level of change described in Paragraph 4.2.46 [Doc. Ref. 5.2.13] [AS-030] and its impact on the setting of a high value asset should result in an assessment of moderate adverse impact.
- 9.30 Paragraphs 4.2.50 and 4.2.51 [Doc. Ref.5.2.13][ AS-030] assesses the potential effect on Biggin Abbey and HLCA22 (Honey Hill North) as permanent moderate adverse which is significant. The District Council agrees with this assessment.

*Permanent Construction Secondary Mitigation- Historic Environment*

- 9.31 The ES [Doc. Ref.5.2.13] [AS-030] identifies two measures which have been developed to address the permanent construction impacts that have been identified in relation to built heritage and historic landscape assets. These are the maintenance of landscape planting to ensure it reaches maturity and the monitoring of vibration during construction. Paragraph 4.2.53 [Doc. Ref.5.2.13] [AS-030] of the report acknowledges that these measures will not reduce the magnitude of the potential impacts associated with the introduction of the landscape planting in permanently changing the setting of the heritage assets.

### *Operational Positive Historic Environment Impacts*

- 9.32 The District Council agrees with the methodology that has been used for the assessment of noise and vibration at operational level.

### *Operational Neutral Impacts*

- 9.33 The District Council considered there to be there are no Operational Neutral Impacts.

### *Operational Negative Historic Environment Impacts*

- 9.34 Paragraph 4.3.5 [Doc. Ref.5.2.13] [AS-030] identifies that the operation of the proposed development will result in **negligible adverse impacts** to the assets.
- 9.35 It acknowledges that the impacts would occur resulting from changes to the setting of the heritage assets which will reduce its contribution to their heritage value.
- 9.36 It is also noted in paragraph 4.3.6 [Doc. Ref.5.2.13] [AS-030] that the new lighting requirements and increased traffic movements will adversely affect the heritage value of the assets.
- 9.37 As a result of the above, it is the opinion of the District Council that the changes do not to equate to a **negligible adverse effect** but would be a **minor/moderate adverse effect**.
- 9.38 Under Section 5.3 [Doc. Ref.5.2.13] [AS-030] the permanent construction effects on built heritage and historic landscapes that with the implementation of mitigation measures, the effects would be **negligible/minor adverse (not significant)** for all receptors except Biggin Abbey where a temporary moderate adverse effect is predicted. The District Council considers that this should read **permanent moderate adverse**.
- 9.39 This assessment does not include HCLA22 which was assessed as having a **moderate adverse effect** which could not be mitigated. The District Council notes that in its overall assessment at paragraph 5.6.1 [Doc. Ref.5.2.13] [AS- 030] the Applicant concludes that: “the Proposed



Development will cause less than substantial harm to designated heritage assets” and that with “the application of the primary, secondary and tertiary mitigation...it is predicted that the level of harm...will be at the lower end of less than substantial harm”.

9.40 This predicted level of harm appears to be based on the existing harm caused to the setting by modern infrastructure including the A14.

9.41 The District Council, whilst agreeing that the proposals will cause less than substantial harm considers the level of adverse effects identified through the Applicant's assessments to Baits Bite Lock, HCLA22 and Biggin Abbey to be at the higher end of less than substantial harm. This assessment takes into account the cumulative harm caused by the proposed development and the harm to the historic agricultural setting of the heritage assets resulting from the proposed landscape mitigation.

#### *Operational Historic Environment Mitigation*

9.42 The District Council is unable to identify any considerations that could be made for the operation of the site to mitigate against the adverse impact.

#### *Requirements - Historic Environment*

9.43 The District Council requires that the proposed mitigation measures are monitored, and this is secured by appropriately worded requirements.

#### **Compliance with Policy**

9.44 The proposed development would not in the District Council's view meet the requirements of SCDC Local Plan Policy NH/14. The built development and landscape mitigation would fail to sustain and enhance the character and distinctiveness of the district's historic environment and would fail to sustain and enhance the significance of the identified heritage assets, including their settings as appropriate to their significance and in accordance with the NPPF.

9.45 In overall terms the District Council considers that less than substantial harm would arise in respect of the above identified heritage assets and

setting. This harm will need to be weighed by the ExA in the first instance and the Secretary of State against the public benefits [see NPPF 202 and NPS 4.10.14] and wider benefits [see NPSWW (2012) 4.10.17] of the proposal.

## 10. TOPIC 5 - Carbon

### Policy Context - Carbon

- 10.1 SCDC Local Plan Policy CC/3 requires proposals for non-residential buildings of 1,000m<sup>2</sup> or more to reduce carbon emissions by a minimum of 10% (to be calculated by reference to a baseline for the anticipated carbon emissions for the property as defined by Building Regulations) through the use of on-site renewable energy and low carbon technologies. This could be provided through the installation of an integrated system or site wide solutions involving the installation of a system that is not integrated within the new building.
- 10.2 For a site wide solution, the policy states that evidence must be submitted demonstrating that the installation is technically feasible and is capable of being installed. Site wide renewable and low carbon energy solutions that maximise on-site generation from these sources will be sought, such as renewable and low carbon district heating systems.

### Carbon Impact Overview

- 10.3 The District Council is broadly satisfied with the approach to assessing carbon emissions and the use of the Institute of Environmental Management and Assessment (IEMA) EIA Guide to Assessing Greenhouse Gas Emissions and their significance (2022).
- 10.4 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.
- 10.5 It is noted that construction, operational and decommissioning activities would generate in excess of 104tCO<sub>2</sub>e over its lifetime. The District Council acknowledges that the net whole life emissions of the proposed

development DCO preferred option, would lead to an estimated - 32,330tCO<sub>2</sub>e due to avoided emissions from export of gas to grid. The alternative DCO option using Combined Heat and Power (CHP) engines, is estimated to give net emissions of 71,480tCO<sub>2</sub>e, which clearly demonstrates the carbon emissions benefits of the proposed development preferred option (DCO).

- 10.6 The District Council agrees with carbon emissions factors applied. It is acknowledged that 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.
- 10.7 As a result, this can impact upon the projected emissions which would be avoided through the use of combined heat and power (CHP) and the export of biomethane to the grid, however the District Council agree that the information provided is a reasonable view based upon current known data.

#### *Construction*

- 10.8 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).
- 10.9 The assessment gives the construction carbon emissions for the Development Consent Order (DCO) planning stage design with two proposed options:
- DCO – Proposed development with Combined Heat and Power engines
  - DCO preferred option – Proposed development with biomethane production

#### *Construction Positive Carbon Impacts*

- 10.10 The District Council is unaware of any positive impacts associated with the construction period in carbon impact terms.

### *Construction Neutral Carbon Impacts*

- 10.11 In respect of decommissioning works, it is noted that the carbon assessment only accounts for carbon emissions associated with vehicle movements in this section. The District Council agrees with the methodology used and the reasoning given behind the exclusions of emissions from other decommissioning activities (accounted for as part of planning permission for development of existing CWWTP).
- 10.12 Vehicle movements account for approximately 13tCO<sub>2</sub>e in total and the District Council considers this to be a minor adverse impact.

### *Construction Negative Carbon Impacts*

- 10.13 The carbon emissions associated with the construction phase of the proposed development equate to 50,790tCO<sub>2</sub>e under the proposed 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 Mtco<sub>2</sub>e.
- 10.14 The District Council considered this to be a ***moderate adverse impact*** of significant effect.

### *Construction Mitigation - Carbon*

- 10.15 The District Council notes that the assessment demonstrates that carbon emissions from construction activities can be reduced by 48% when comparing the DM0 (Delivery Milestone Zero) 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. The Applicant has a target to achieve a 70% reduction, meaning a further 22% reduction, (equating to just over 21,000 tonnes of CO<sub>2</sub>e), is still required. Secondary mitigating measures have been identified, such as:
- Continued innovation review;
  - Material specification, requiring low carbon intensity materials; and
  - Efficient construction

10.16 It is noted that such savings will be achieved during the later design stages, and it is therefore important in the District Council's view that the Code of Construction and future Construction Environmental Management Plan (ES Volume 4 Chapter 2, Appendix 2.1) [Doc ref. 5.4.2.1, APP-068] and the whole life carbon assessment is updated as this detail becomes available.

#### *Operational Carbon Impacts*

10.17 The assessment provides 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)

10.18 The District Council notes that the document states that operational energy use covers routine maintenance activities and carbon emissions from capital replacements are included within the whole life carbon assessment. The District Council considers clarification is needed as to what capital replacements consist of in the context of the proposal.

10.19 Clarity is also required in respect of how carbon intensive these are and how frequent are they likely to be. In the event that these capital replacements are occurring during the operational phase, the District Council considers clarification is needed as to what the rationale is for excluding these emissions from this phase particularly given the maintenance/upgrade of facilities required during this phase.

#### *Operational Positive Carbon Impacts*

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

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

10.21 The use of CHP engines in DM0 would offset 1,030 tCO<sub>2</sub>e/year giving a net a carbon emission of 1,110 tCO<sub>2</sub>/yr. The preferred option (DCO) gives a negative net emission of 3,490 tCO<sub>2</sub>/yr. This is due to the fact

that the biomethane transfer to the gas grid would offset 6,210 tCO<sub>2</sub>/yr [Doc. Ref. 5.2.10] [APP-042].

- 10.22 In the context of the treatment of water as per the operational function of the proposed development, the District Council notes the average emissions per megalitre of water currently processed in existing facilities is 0.432tCO<sub>2</sub> per megalitre, the DM0 option reduces this to 0.018 tCO<sub>2</sub> per megalitre and DCO offers a further reduction, down to - 0.055 tCO<sub>2</sub> per megalitre [Doc. Ref. 5.2.10] [APP-042].
- 10.23 The District 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.
- 10.24 The export of biomethane used in preferred option DCO, gives the proposed development a beneficial, significant impact at operational stage.
- 10.25 The District Council notes that the Applicant will be planting a large area of deciduous woodland, which, once established after year 11, should offer an additional 101tCO<sub>2</sub>e per year. The District Council considers this to be a positive impact in carbon terms.

#### *Operational Neutral Carbon Impacts*

- 10.26 The assessment [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 tCO<sub>2</sub>e per year which the District Council considers to be relatively insignificant, as from year 11 the deciduous woodland planted as part of the proposed development, is predicted to sequester 101tCO<sub>2</sub>e/yr.

#### *Operational Negative Carbon Impacts*

- 10.27 The operational impact of both options, DM0 and DCO, have a moderate adverse impact, considered as significant, which remains unchanged for option DM0, even after the use of CHP to reduce emissions.
- 10.28 The export of biomethane used in preferred option DCO, gives the proposed development a beneficial, significant impact at operational

stage. The District Council does however wish to raise the point 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 have annual net carbon emissions of 1,110tCO<sub>2</sub>e, which the District Council considers the impact to be moderately adverse and significant.

### *Operational Carbon Mitigation*

- 10.29 The District Council notes that further measures to improve energy efficiency and generate renewable energy will be evaluated further at design stage. This includes the installation of a 7mW solar photovoltaic array.
- 10.30 The District Council considers it is essential to ensure that the DCO provisions allow for a continual process of refinement of information and data to be provided to the District Council. As the scheme moves towards detailed design, the most accurate information should be made available to inform the development. This can be achieved through a requirement in the DCO.
- 10.31 The District Council notes 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 in light of uncertainty in future energy policy and the impact on future carbon intensities, it is considered that an outline of the timescales for monitoring, reviewing and updating the carbon emissions associated with this project should be provided to ensure the most accurate information is available to inform the development and ensure the scheme is meeting standards and targets in relation to carbon. The District Council considers this also should be reflected in a requirement.

### *Requirements - Carbon*

- 10.32 In light of the above, the District Council considers that the following requirements should be considered as part of the DCO:
- Decommissioning of the proposed 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 District Council agrees that quantifying these emissions would be a best estimation, the implications of decommissioning should form part of the whole life carbon assessment.

- The District Council acknowledges that the proposed 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 District Council recommends a section should be included within the whole life carbon assessment relating to future development of the site and the potential carbon emissions resulting from this as this may impact on the deliverability of net zero aspirations.

### **Compliance with Policy**

- 10.33 The two options presented in response to this policy should exceed compliance. Due to the nature of the Rochdale Envelope Approach which applies in a DCO there is some flexibility in relation to modelling the carbon emissions of a development of this nature, but the worst-case scenario has been presented which should result in a carbon zero development. A large solar PV array is suggested for the development and modelling currently excludes the impact of this system on carbon emissions. Once included at detailed design, the carbon emissions reduction from renewables and Low Zero Carbon (LZC) technology should be even greater.
- 10.34 The District Council considers therefore that the proposal would comply with SCDC Local Plan Policy CC/3 of the South Cambridgeshire District Council.

## **11. TOPIC 5 - Ecology and Biodiversity**

### **Policy Context - Ecology and Biodiversity**



- 11.1 SCDC Local Plan Policy NH/4 requires new development to maintain, enhance, restore or add to biodiversity. New development should achieve positive gain through the form and design of development. Measures may include creating, enhancing and managing wildlife habitats and networks, and natural landscape. The built environment should be viewed as an opportunity to fully integrate biodiversity within new development through innovation.

### **Ecology and Biodiversity Overview**

- 11.2 Policy NH/4 requires that where a proposal may affect a Protected Species, Priority Species or Priority Habitat, adequate level of survey information and site assessment to establish the extent of any potential impact will be required.

#### *Construction Positive Ecology and Biodiversity Impacts*

- 11.3 There is a potential net gain of habitat, hedgerow, and river units when applied to areas within and outside the redline boundary of the proposed site. These additional biodiversity features will have a positive impact on local and national species of importance by providing additional resources such as fruiting plants and trees, pollen, suitable areas for nesting and roosting, and attracting prey species.

#### *Construction Neutral Ecology and Biodiversity Impacts*

- 11.4 The District Council notes that the Construction and Environmental Management Plan (CEMP) as proposed by the Applicant and the likely terms of which are set out in [Doc ref 5.4.2.1] [AS-026] is to make reference to consent being sought under section 61 of the Control of Pollution Act 1974 (CoPA) which should be clarified owing to the potential dual regulation through both the planning and environmental health legislation (section 61). The District Council recommends that the CEMP provides the primary regulatory framework for the developer to operate within rather than utilising the S.61 consent through the COPA. The District Council accepts the working hours identified given the relatively remote location of the new site and transitional works.

#### *Construction Negative Ecology and Biodiversity Impacts*

- 11.5 In respect of the Biodiversity Chapter of the ES [Doc. Ref.5.2.8] [[AS-026] the District Council notes that in Table 2-8 no justification has

been given for the temporary increase in ambient light levels during construction for the ReWWTP and pipeline installation.

- 11.6 There is reference to invasive non-native species (INNS) encountered within water bodies and water courses likely to be spread through the proliferation of seed dispersal into the waterbody/course (Himalayan Balsam for example), or inadvertent dispersal of vegetation fragments (floating pennywort) into waterbodies/courses [Table 2-10]. Any soil removed from site where INNS are encountered should be considered contaminated and treated appropriately.
- 11.7 References within the Environmental Statement Chapter 8: Biodiversity to Appendix 2.1: Code of Construction Practice Part A [Doc. Ref. 5.4.2.1] [APP- 068] for all construction mitigation in respect to INNS shows a very generic method statement that has not been modified to suit the specific constraints found on and adjacent to the construction site. Water/river related INNS are generally spread through seed and filament dispersal within the river itself, not through movement of soil/substratum by mechanical methods (although this can contribute to it).

#### *Construction Ecology and Biodiversity Mitigation*

- 11.8 Any soil removed from site where INNS are encountered should be considered contaminated and treated appropriately. The described mitigation would not be effective at halting the increased range of species such as this. This mitigation should be revised, and in some cases eradication of the INNS from the works site or adjacent to the works site with ongoing management to remove any re-growth during the works period would be a more effective strategy than that described in table 2-10 [Doc. Ref.5.2.8] [AS-026].

#### *Operational Positive Ecology and Biodiversity Impacts*

- 11.9 The creation of large areas of new habitat managed for wildlife and ecology will have a beneficial impact on local flora and fauna. Providing additional resources for birds, small and large mammals, reptiles, and invertebrates,

#### *Operational Neutral Ecology and Biodiversity Impacts*

- 11.10 Lighting along Horningsea Road will be adopted by the Local Highway Authority who have their own requirements for adoption. Confirmation that the proposed mitigation has been agreed with Local Highways will be required.

*Operational Negative Ecology and Biodiversity Impacts*

- 11.11 There is not considered to be any Negative Operational impacts in respect of Ecology and Biodiversity.

*Operational Ecology and Biodiversity Mitigation*

- 11.12 It is not clear if there a designated receptor site to receive translocated reptiles and if not, it is not clear how potential double handling issues will be dealt with in view of other large developments in the area.

*Requirements - Ecology and Biodiversity*

- 11.13 The District Council considers that BNG should be secured through a S106 agreement (or equivalent mechanism) with ecological monitoring fees for the LPA included.

**Compliance with Policy**

- 11.14 In the District Council's view, the proposed development would meet the requirements of Local Plan Policy NH/4. This is however subject to the further requirements set out above being imposed upon the DCO.

## **12. TOPIC 6 - Land Quality and Contamination**

### **Policy Context - Land Quality and Contamination**

- 12.1 Policy SC/11: Contaminated Land of the requires that where development is proposed on contaminated land or land suspected of being impacted by contaminants the Council will require an assessment of the extent of contamination and any possible risks. Proposals will only be permitted where land is, or can be made, suitable for the proposed use.

- 12.2 The District Council notes the that Preliminary Risk Assessment forming Appendix 14.1 of the “Land Quality” Chapter of the ES [Doc ref 5.4.14.1] [APP-122] outlines the need for intrusive ground investigation to further assess potential risks. Partial results from the intrusive investigation were available and reported within the Preliminary Risk Assessment and it is expected that the complete Ground Investigation Reports will be submitted in due course.

### **Land Contamination Overview**

- 12.3 In general terms the contamination and land quality assessment within the Land Quality Chapter of the ES [Doc.Ref.5.2.14] [AS-066] is considered to be in line with the Environment Agency’s LCRM guidance [**Appendix 1, GCSP-47**] and is therefore acceptable.  
Construction Positive Land Quality and Contamination Impacts
- 12.4 Ground investigation and risk assessment will have been completed following the Environment Agency’s Land Contamination Risk Management (LCRM) guidance prior to commencement of construction<sup>1</sup>. The risk of contamination is considered low, however, should any unforeseen contamination be encountered during construction, this will be managed through the proposed protocol for addressing any unexpected contamination.

### *Construction Neutral Land Quality and Contamination Impacts*

- 12.5 Though there is potential inhalation of dust from contaminated soils during construction by on-site and off-site users, caused by potential creation and migration off-site of dust from excavations, soil management and stockpiling and vehicle movements, the risk is considered low. It is noted that soils are unlikely to be contaminated, based on information within the submitted Preliminary Risk Assessment forming Appendix 14.1 of the Environmental Statement [Doc ref. 5.4.14.1] [APP-122].
- 12.6 Results from a partially completed ground investigation have been provided and indicate the soils tested do not exceed Generic Assessment Criteria for human health. The District Council would require the submission of a full ground investigation report, on completion of the site investigation to confirm this.

12.7 There are neutral impacts in relation to migration of existing contamination through preferential pathways to controlled waters. With the underlying aquifers and water bodies being in hydraulic continuity, no additional pathways would be introduced through piling or the creation of shafts or tunnels. There is limited groundwater and no significant sources of contamination identified on the proposed site, however, the submission of the full ground investigation report, on completion of the site investigation, is necessary to confirm this [Doc.Ref.5.2.14] [AS-066].

12.8 The District Council agree there are no changes in risks between baseline and construction.

*Construction Negative Land Quality and Contamination Impacts*

12.9 There are no negative construction impacts identified in respect of land quality and contamination. The District Council agrees with the methodology that has been used for the assessment of Land Quality and Contamination prior to construction.

*Construction Land Quality and Contamination Mitigation*

12.10 Notwithstanding the absence of a full ground investigation report, the District Council agrees that information within the preliminary risk assessment demonstrates risks to construction workers, final end users (ReWWTP workers) and occupants of nearby residential and commercial properties, from ground conditions, are not likely to comprise a significant effect.

12.11 Secondary mitigation measures within the Code of Construction Practice, such as soil management including stockpile control, PPE requirements, the inclusion of an unexpected contamination protocol and the requirement to develop an Unexploded Ordnance mitigation strategy, are noted.

*Operational Positive Land Quality and Contamination Impacts*

12.12 There are no operational positive impacts identified in respect of land quality and contamination.

*Operational Neutral Land Quality and Contamination Impacts*

- 12.13 Material generated during construction of shafts and tunnels is proposed for re-use within the construction of the landscaped earth bank, though this will be vegetated and contact likely to be minimal. Land used for the construction of the ReWWTP and the Waterbeach pipeline, will be reinstated and continue to be used for agriculture and recreation. The soils will predominantly be clean and natural materials. Laboratory testing results provided from the partially completed ground investigation suggest soils do not exceed Generic Assessment Criteria for human health (commercial land use and public open space).
- 12.14 Limited made ground soils have been identified on the proposed site, with the majority of made ground soils encountered on the existing WWTP site. If made ground soils are proposed for re-use, these will need to be appropriately managed under a materials management plan, with testing required to demonstrate the soils are suitable for reuse in terms of risk to human health and controlled waters.
- 12.15 The District Council agree there are no changes in risks between baseline and operation.

*Operational Negative Land Quality and Contamination Impacts*

- 12.16 There are no operational negative impacts identified in respect of land quality and contamination. The District Council agrees with the methodology that has been used for the assessment of Land Quality and Contamination at operational level.

*Operational Land Quality and Contamination Mitigation*

- 12.17 There are no relevant operational mitigation measures.

*Requirements - Land Quality and Contamination*

- 12.18 The following requirements should be considered as part of the DCO to protect human health and the environment in terms of land contamination:
- 12.19 The investigation, assessment and management of land contamination should continue to follow the Environment Agency's Land Contamination Risk Management (LCRM) guidance.

- 12.20 On completion of the ground investigation, the full Ground Investigation Reports should be submitted to the Council for review.

### **Compliance with Policy**

- 12.21 The proposed development would accord with the principles set out in policy SC/11 of the SCDC Local Plan [**Appendix 1, GCSP-1**] This is subject to ensuring compliance with the Environment Agency's Land Contamination Risk Management (LCRM) guidance [**Appendix 1, GCSP-47**].

## **13. TOPIC 7 - Odour Impacts**

- 13.1 Policy SC/14 of the SCDC Local Plan [**Appendix 1, GCSP-1**] indicates that development likely to generate malodours and emissions to air such as dust, fumes, smoke, heat, radiation, gases, steam or other forms of pollution will only be permitted where it can be demonstrated that it will not have significant adverse effects on health, amenity of existing or proposed sensitive end users. In appropriate circumstances an odour or other emissions to air impact assessment may be required to be submitted.

### **Odour impact overview**

- 13.2 The District Council is in agreement with the scope and methodology of the assessments of odour [Doc. Ref. 5.2.18] [APP-050]. However, it should be noted that the odour contours have been modelled on the assumption that the offensiveness of the odour is considered "moderately offensive" rather than "highly offensive". This is on the basis on the relevant guidance stated that sewage works, operating under normal conditions, should be considered as such. This appears to be a conservative approach to odour and it is felt that it would be beneficial to consider the odour as "highly offensive" to provide some assurance that identified sensitive receptors are unlikely to be affected.
- 13.3 The District Council would welcome further clarification on what is considered "normal conditions" and how often "normal operation" is expected, taking into account climate change is likely to result in drier conditions as well as new sustainable development being designed to use less water, thereby increasing the influent dilution.

#### *Construction Positive Odour Impacts*

- 13.4 The District Council considers there not to be any known positive impacts associated with the construction period.

#### *Construction Neutral Odour Impacts*

- 13.5 The District Council considers there not to be any known neutral impacts associated with the construction period.

#### *Construction Negative Odour Impacts*

- 13.6 There are negative constructions impacts in respect of the introduction of the proposed use on a greenfield site, including any potential teething issues as the proposed site is phased from construction, commissioning before finally becoming operational. Whilst the District Council appreciates that the Applicant will be regulated by the Environment Agency, it is not clear when the primary regulation is the DCO or the Environmental Permit during the commissioning phase, nor how long the commissioning is likely to take, and this should be clarified.

#### *Construction Odour Mitigation*

- 13.7 The recommended construction mitigation is greater transparency between the environmental permit which the Applicant will require and the DCO process. Clarity is sought on the commissioning phase and contingency for any overrun of the development of the project.
- 13.8 Whilst the proposed mitigation is considered acceptable, clarification is sought on the construction and commissioning phase as to when the site's Environmental Permit or the DCO provides the primary regulatory framework to regulate the site.

#### *Operational Positive Odour Impacts*

- 13.9 The District Council considers there not to be any known positive impacts associated with the operational period.



#### *Operational Neutral Odour Impacts*

13.10 The District Council considers there not to be any known neutral impacts associated with the operational period.

#### *Operational Negative Odour Impacts*

13.11 The District Council would welcome further information on the impact that influent dilution can have on odour considering the scenario of climate change (particularly drier weather) as well as reduced household water use which is likely to result in concentrated influent.

#### *Operational Odour Mitigation*

13.12 The District Council notes that the Applicant has designed / scoped out as much odour as possible, and it is assumed that the site will have BPM (best practicable means) as part of their environmental permit.

#### *Requirements - Odour*

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

- Outline Commissioning Plan
- Odour modelling / further information would be beneficial to consider concentrated influent.
- More detail on water, climate change

#### **Compliance with Policy**

13.14 The proposed development would meet the requirements of Local Plan Policy SC/14. This is subject however to the imposition of further requirements as set out above.

## **14. TOPIC 8 - Air Quality Impacts**

### **Policy Context**

- 14.1 Policy SC/12 (Air Quality) of the SCDC Local Plan [**Appendix 1, GCSP-1**] requires that where development proposals would be subject to unacceptable air quality standards or would have an unacceptable impact on air quality standards they will be refused. Where emissions from the proposed development are prescribed by EU limit values or national objectives, the Applicant will need to assess the impact on local air quality by undertaking an appropriate air quality assessment and detailed modelling exercise having regard to guidance current at the time of the application to show that the national objectives will still be achieved.
- 14.2 Policy SC/12 requires 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 emissions to air. Where a development is a sensitive end use, that there will not be any significant adverse effects on health, the environment or amenity arising from existing poor air quality.

### **Air Quality Overview**

- 14.3 In general terms, the District Council is satisfied with the scope, methodology and the conclusions derived from the Air Quality Chapter of the ES [Doc ref 5.2.7][ APP-039].

#### *Construction Positive Air Quality Impacts*

- 14.4 There are no identified positive construction impacts in relation to air quality for this development.

#### *Construction Neutral Air Quality Impacts*

- 14.5 There are no identified neutral construction impacts in respect to air quality for this development.

#### *Construction Negative Air Quality Impacts*

- 14.6 There are potential negative constructions impacts in respect of the emissions from additional vehicle movements (especially HGV movements), as well as dust from construction activities and vehicle track out. These are all assessed within the Environmental Statement

[Doc ref 5.2.7][ APP-039]. and are considered to be low to negligible negative impacts that do not require any specific mitigation measures.

#### *Construction Air Quality Mitigation*

- 14.7 We note that a number of mitigation measures are embedded into the design, such as the re-use of soil on site (to form the bank) reducing the need for soil disposal and therefore reducing the number of potential HGV movements. However, other mitigation measures, such as dust suppression, will also be adopted as part of the Code of Construction Practice and included within the air quality management plan.

#### *Operational Positive Air Quality Impacts*

- 14.8 There are no identified positive operational impacts in relation to air quality for this development.

#### *Operational Neutral Air Quality Impacts*

There are no identified neutral operational impacts in relation to air quality for this development.

#### *Operational Negative Air Quality Impacts*

- 14.9 There are potential negative impacts both from the increase in vehicle movements (especially HGVs) associated with the operation of the ReWWTP and with the potential burning of biogas within a CHP plant. Both of these impacts have been assessed within the air quality chapter of the Environmental Statement and are considered to be negligible negative impacts.

#### *Operational Air Quality Mitigation*

- 14.10 There are no specific operational mitigation measures required although it is noted that any emissions from the potential CHP would be controlled by the medium combustion plant directive or as part of any permit required by the Environment Agency for operation of the WWTP.

#### *Requirements - Air Quality*

- 14.11 The following requirements should be considered as part of the DCO to protect safeguard the amenities of the surrounding community.
- 14.12 An air quality management plan which shall detail how emissions, including dust emissions from construction activities, will be minimised should be produced and condition as part of the DCO.

### **Compliance with Policy**

- 14.13 The proposed development would in the District Council's view meet the requirements of Local Plan Policy SC/12. The District Council also considers the additional requirements set out above should be imposed.

## **15. TOPIC 9 - Noise and Vibration**

### **Policy Context - Noise and Vibration**

- 15.1 The relevant development plan policies that apply to the assessment of noise is Policy SC/10: Noise Pollution. SCDC Local Plan Policy SC/10 requires that planning permission is only granted to development that do not result in an adverse impact on the indoor and outdoor acoustic environment of existing or planned development. Development should also not result in an adverse impact on countryside areas of tranquillity which are important for wildlife and countryside impacts.
- 15.2 The District Council will seek to ensure 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**

- 15.3 The District Council is generally satisfied with the scope, methodology and conclusions derived from the Noise and Vibration Chapter (Chapter 15) of the ES [Doc ref.5.2.17] [AS-036]. The District Council notes that the CEMP makes reference to S.61 consent being sought which should be clarified owing to the potential dual regulation through both the planning and environmental health legislation (section 61).

- 15.4 The District Council recommends that the CEMP provides the primary regulatory framework for the developer to operate within rather than utilising the S.61 consent through the Control of Pollution Act 1974.

*Construction Positive Noise and Vibration Impacts*

- 15.5 The District Council notes that the principal contractor will prepare a Noise and Vibration Management Plan before development commences [Doc ref.5.2.17] [AS-036]. In addition, the Applicant will develop a community liaison plan to inform the local community and stakeholders of works taking place, including durations, particularly when it involves working outside of the core working hours or impact community facilities and businesses. The District Council considers this to be a positive impact.

*Construction Neutral Noise and Vibration Impacts*

- 15.6 The District Council agrees with the methodology that has been used for the assessment for noise and vibration and the mitigation proposed to reduce the likelihood of complaints occurring.

*Construction Negative Noise and Vibration Impacts*

- 15.7 The District Council considers that the following matters have a negative impact on the development:

Paragraph 2.2.29 of the Environmental Statement Chapter 17: Noise and Vibration [Doc ref.5.2.17] [AS-036] submitted by the applicant, states:

*“There is no nationally adopted approach or guidance which define the sensitivity of noise and vibration sensitive receptors. The sensitivity of different receptors has been reviewed in accordance with prevailing standards and guidance accounting for criteria such as their ability to absorb change, their importance and value.”* A Table 2-7: Receptor Sensitivity Criteria is then provided in the same Chapter which is copied below. This categorises the sensitivity (low, medium, high or very high), the criteria (for this sensitivity) and Examples of the type of setting appropriate.

**Table 2-7: Receptor sensitivity criteria**

<b>Sensitivity</b>	<b>Criteria</b>	<b>Examples</b>
<b>Low</b>	Tolerant to change Lower quality/importance	Commercial, industrial and agricultural uses unless otherwise identified due to their specific circumstances.
<b>Medium</b>	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.
<b>High</b>	Low tolerance to change Locally significant attribute of high value	Subject to specific circumstances.
<b>Very High</b>	Very low tolerance to change Nationally significant attribute of high value	Subject to specific circumstances.

15.8 Whilst residential receptors may be classed or justified as medium sensitivity, the term “residential” applies to a wide range of properties including city and towns, houses near infrastructure such as roads, railway or airports, which are likely to experience high noise levels compared to villages / hamlets which are likely to be afforded a high degree of rural tranquillity, which is unlikely to be accounted for with the broad classification of “medium” receptor. This is particularly the case as they are likely to have a low tolerance to change, the criteria for high sensitivity. The District Council would therefore welcome further clarification on what the Applicant may consider “high” or “very high” sensitivity, given that examples in these categories are not given, as well as their comments on the protection of rural tranquillity.

15.9 The majority of sensitive receptors are likely to benefit from low background, which could mean that residents should be considered within “high” sensitivity with little weighting given to their expectation of living in the countryside. The District Council seeks further clarity as to why this sensitivity rating has been determined for all residential properties.

15.10 The District Council notes that the CEMP makes reference to S.61 consent being sought in addition to the CEMP through the DCO process. This has the potential of dual regulation through both the planning and environmental health legislation. The District Council recommends that the CEMP provides the primary regulatory framework

for the developer to operate within rather than utilising the S.61 consent through the Control of Pollution Act 1974.

- 15.11 The District Council notes that within the community liaison CEMP, that there is no obligation for the Applicant to notify the District Council on any complaints received other than through liaison meetings with third parties. The District Council recommends that a mechanism is incorporated that updates on any complaints received throughout the construction is reported to the Council's Environmental Health department through DCO requirements.

#### *Construction Noise and Vibration Mitigation*

- 15.12 The District Council notes that some of the proposed mitigation measures are 'embedded' in the design of the proposed development. For example, it is advised that the adjustment of Order Limits to avoid sensitive features, amending the sizing and location of temporary access routes and compounds has allowed for noise impacts on sensitive receptors to be mitigated [Doc ref.5.2.17] [AS-036]. The District Council has not identified any additional mitigation measures for the development.

#### *Operational Positive Noise and Vibration Impacts*

- 15.13 The District Council considers there not to be any known positive impacts associated with the operational period.

#### *Operational Neutral Noise and Vibration Impacts*

- 15.14 The District Council notes that the operation of the proposed ReWWTP is assumed continuous during daytime and night-time periods [Doc. Ref. 5.2.17] [AS-036]. It is advised that there would be no differences in noise levels are predicted between day- and night-time periods.
- 15.15 According to the submitted information [Doc. Ref. 5.2.17] [AS-036], noise levels at the nearest receptor locations are predicted to result in noise levels that are at least 10 dB lower than the prevailing ambient noise conditions at all of the nearest receptor locations. Noise emissions from the development would result in predominantly broad band noise (pumps and mixers) which would not be perceptible when assessed at the nearest noise sensitive receptors due to relatively high

existing ambient noise conditions. The District Council considers that there would therefore be a neutral impact on noise and vibration as a result of the proposed ReWWTP.

#### *Operational Negative Noise and Vibration Impacts*

15.16 The District Council has not identified any neutral or negative noise and vibration impacts associated with the operational period.

#### *Operational Noise and Vibration Mitigation*

15.17 The District Council has not identified any operational Mitigation that can or needs to be undertaken in respect of the operational period.

#### *Requirements - Noise and Vibration*

15.18 The District Council notes that during the operational phase, monitoring of operational noise will be a requirement of the permit issued by the Environment Agency [Doc ref. 5.2.17] [AS-036]. The monitoring parameters, duration, frequency and reporting will be specified in accordance with the permitting requirements. On this basis, the District Council considers no further requirements are required.

### **Compliance with Policy**

15.19 The proposed development would in the District Council's view meet the requirements of Policy SC/10 of the SCDC Local Plan.

## **16. Topic 10 - Lighting**

### **Policy Context – Lighting**

16.1 The relevant local planning policy for lighting is Policy SC/9 of the SCDC Local Plan and it requires that any development proposals for new external lighting will only be supported where it can be demonstrated that the proposed lighting scheme and levels are the minimum required for reasons of public safety, crime prevention and security.



- 16.2 The policy requires that light spillage and glare are minimised and there are no unacceptable adverse impacts on the local amenity of neighbouring or nearby properties, or on the surrounding countryside; as well as no dazzling or distraction to road users including cyclists, equestrians and pedestrians. It also requires road and footway lighting meets the County Council's adopted standards.

### **Lighting Overview**

- 16.3 South Cambridgeshire is a predominantly rural area and as such sensitive to light pollution through sky glow which can affect the tranquillity of the countryside. Light pollution can have a negative impact upon biodiversity by affecting the normal diurnal (daily) patterns of plants, animals and insects and can be a waste of energy and resources. The location of the ReWWTP is particularly sensitive given the surrounding landscape is mostly rural with limited lighting emanating from the A14 and Horningsea Roads.

#### *Construction Positive Lighting Impacts*

- 16.4 There are no positive construction impacts in respect of lighting that have been identified.

#### *Construction Neutral Lighting Impacts*

- 16.5 There are no neutral impacts that have been identified in respect of lighting.

#### *Construction Negative Lighting Impacts*

- 16.6 The lighting strategy is described in the Lighting Design Strategy [Appendix 2.5, App Doc Ref 5.4.2.5] [APP-072]. It is advised that Lighting will be required during working hours on construction compounds and task lighting will be required along the pipeline routes and at the treated effluent discharge outfall for:

- up to 12 months at the construction compound near the outfall;

- up to 14 months at the construction compound for Waterbeach pipeline, with 24-hour lighting on horizontal directional drilling sites when work is in progress;
- intermittently at Shaft 4 with up to three months during shaft construction, then up to five days for each event to recover the tunnelling equipment;
- up to 24 months at the compound at Shaft 5;
- up to 39 months at the land required for the construction of the proposed ReWWTP and completion of the landscaping proposals; and
- navigational warning lights will be within the river for up to four months for the construction of the outfall.

16.7 Given the location of the site as a rural location with limited existing lighting, it is the view of the District Council that the proposed lighting would have a negative impact on the area.

16.8 It is also advised that lighting details including locations, duration of use, lighting types will be agreed between the Applicant and their principal contractor during the detailed design stage [[Doc Ref. 5.4.15.3] [AS 100]] It is not clear whether the District Council would be consulted on these details given the potential for night-time working and light spillage.

#### *Construction Lighting Mitigation*

16.9 It is not clear if the District Council would be consulted on the location of any potential lighting during construction [Para.6.2.3 Doc Ref. 5.4.2.5] APP-072].

16.10 The recommended construction mitigation is the specification of glass with a low visible light transmission factor. This would reduce the amount of natural light entering the building, which is an important design consideration for the health and well-being of those using the building. Lastly it is proposed to provide automated shutters and/or blinds (the preferred option) that would be activated when the lights are switched on.

#### *Operational Positive Lighting Impacts*

- 16.11 There are no positive operational impacts that have been identified in respect to lighting.

*Operational Neutral Lighting Impacts*

- 16.12 Lighting along Horningsea Road will be adopted by Cambridgeshire County Council as the Local Highway Authority. It will therefore be for the Highway Authority to confirm that the proposed lighting is appropriate.

*Operational Negative Lighting Impacts*

- 16.13 All operational and maintenance lighting within the proposed ReWWTP for walkways, roadways, car parking and above internal accesses will be a maximum of 5m in height and below the height of the earth bank. Although this is not a significant height it will result in a permanent change to the existing landscape, particularly at night time.

*Operational Lighting Mitigation*

- 16.14 The District Council considers that the mitigation measures that have been proposed by the Applicant are considered to be appropriate.

*Requirements - Lighting*

- 16.15 The District Council considers that construction lighting should be monitored through the CEMP. The location, specification and duration of construction should be provided as part of the CEMP to ensure that any potential for light pollution is minimised.

**Compliance with Policy**

- 16.16 The proposed development in the District Council's view would meet the requirements of Policy SC/9 of the SCDC Local Plan.

## **17. TOPIC 11 - Public Health**

### **Policy Context - Public Health**

- 17.1 Policy SC/2 of the SCDC Local Plan requires that new development should have a positive impact on the health and wellbeing of new and existing residents.
- 17.2 Policy SC/2 states that there may be other categories of development where the District Council considers that the submission of a Health Impact Assessment (HIA) is necessary, particularly categories of development contained in Schedule 1 and 2 of Environmental Impact Assessment Regulations.

### **Public Health Overview**

- 17.3 South Cambridgeshire District Council is a signatory of the 2022 Cambridgeshire and Peterborough Integrated Care System (CPICS) Health Care Strategy [**Appendix 1, GCSP- 50**]. This Strategy outlined 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.
- 17.4 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 eve:
- 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.
- 17.5 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.

- 17.6 The District 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].

*Construction Positive Public Health Impacts*

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

*Construction Neutral Public Health Impacts*

- 17.8 There will be an increased local presence of construction staff in small communities during construction. The proposed Code of Construction Practice (CoCP) [Doc ref 5.4.2.1 and 5.4.2.2] [APP 068 and APP 069] requires all construction workers to undertake appropriate training including an expectation as to their behaviour and conduct whilst on site (Section 5.2, para 5.2.4).
- 17.9 The CoCP should contain clear guidelines in the District Council's view as to how a member of the community who has concerns can report this. A draft Community Liaison Plan [Doc Ref 7.8] [AS-132] is proposed to include communication of construction activities including community liaison.
- 17.10 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 in the District Council's view. In addition, as part of this scheme a full-time staff member should be recruited to manage the Community liaison and engage and work with the community throughout construction.

*Construction Negative Public Health Impacts*

- 17.11 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].

- 17.12 There is no formal guidance on considering health within the context of EIA. Therefore, the District Council agrees with the approach to the assessment and the methodology used as outlined in Chapter 12 of the ES [Doc ref. 5.2.12] [APP-044]. Namely, the approach has been influenced using the 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 District Council is content with this approach and is also satisfied with the geographical study area, temporal scope and the baseline study.
- 17.13 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, GCSP- 42]** are also supported. The District 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*

- 17.14 The proposed Mitigation measures to be employed during the construction period have been considered by the District Council in the context of effect on public health.
- 17.15 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. To ensure that local jobs are prioritised for local people, the District Council recommends that jobs are advertised locally for the first 2 weeks prior to more national recruitment portals.
- 17.16 There should also be opportunities created for students and recent graduates of the Cambridge Regional College to maximise opportunities for apprenticeship roles.

### *Operational Positive Public Health Impacts*

- 17.17 The District Council has found positive operational impacts arising as a consequence of this development and notes the following operational measures that have been put forward as part of the proposal:
- 17.18 Positive operational impacts arise from opportunities for learning and knowledge via the proposed Discovery Centre. The Discovery Centre presents opportunities for community outreach, linking with schools, colleges and interest groups in relation to water use, preservation and climate change. However, little detail can be found in the application as to its aims, operational hours and whether there will be a full-time member of staff to proactively engage with communities.
- 17.19 Clean wastewater has the potential to improve the health of the river, which can lead to greater use by the public to enjoy leisure activities. It can also improve the biodiversity and encourage more wildlife and habitats. The District Council would suggest that a volunteer river group could be created to work with Anglian Water to help monitor river quality and growth in habitat diversity working with the Discovery Centre.
- 17.20 The District Council in overall terms supports the proposal of a Community Liaison Plan [Doc Ref 7.8] [AS-132] to be put in place to proactively inform local communities and stakeholders of any works, or duration where it falls outside of agreed core working hours or poses obstruction to ProWs, businesses, facilities and local infrastructure.
- 17.21 Active travel connections around the immediate area will be enhanced once the site is operational. This will open up the area for active pursuits including walking cycling and horse-riding.

### *Operational Neutral Public Health Impacts*

- 17.22 The District Council has not identified any neutral impacts in relation to the public health impacts of the development.

### *Operational Negative Impacts*

- 17.23 There are no operational negative impacts that have been identified by the District Council.

### *Operational Public Health Mitigation*

- 17.24 The District 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 District Council consider that all on going community engagement plans/strategies should involve this cohort. This can be done in collaboration with the GRT Liaison Officer at the District Council.
- 17.25 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 District 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*

- 17.26 Lighting along Horningsea Road will be adopted by Local Highways who have their own requirements for adoption. Confirmation that the proposed mitigation has been agreed with Local Highways will clearly be required.
- 17.27 The District Council considers that provision needs to be made within the Community Liaison Plan to ensure that effective engagement with vulnerable population groups including the Gypsy, Roma, Traveller (GRT) community is undertaken.
- 17.28 It is noted that the ES report [Table 2-7 Chapter 12: Health] [Reference: 5.2.12] [APP-044] states that during the peak construction period there will be approximately 60 supervisory and administrative staff as well as approx. 300 construction staff. The Health Chapter of the ES [Reference: 5.2.12] [APP-044] does not refer to ensuring access to healthy food during this phase and in light of the relative rurality of the location, the District Council considers this needs to be addressed to ensure staff have access to healthy food options.
- 17.29 In respect of Construction Traffic Management Plan (CTMP) [Appendix 19.7] [Doc ref 5.4.19.7], [AS-109] the report states that controls will be



put in place to prevent construction traffic from travelling through Horningsea and Fen Ditton.

- 17.30 The CMTP also sets out [Section 6.9 of the CTMP] [Doc ref 5.4.19.7], [AS-109] that construction traffic must avoid the AM and PM peak periods as well as school pickup and drop off hours. The District Council therefore requests that the details on how this will be monitored, reported, and enforced, should be provided.
- 17.31 In respect of the mental health and wellbeing assessment [Appendix 12.3, App Doc Ref 5.4.12.3] [AS-077], the District Council is satisfied that baseline measurements have been taken (page 13). However, it is noted that any specific reference in Chapter 5.2 for how mitigation would be secured, nor when further assessments would be undertaken to monitor change, have been included. The District Council requires this information to be provided.

### **Compliance with Policy**

- 17.32 The proposed development in the District Council's view would accord with the principles set out in policy SC/2 of the SCDC Local Plan in that a Health Impact Assessment has been submitted. The District Council however considers that the additional matters referred to above need to be provided and addressed and requirements imposed upon the DCO.

## **18. TOPIC 12 - Community Impact**

### **Policy Context – Community**

- 18.1 Policy SC/4 of the SCDC Local Plan requires a community development strategy to be prepared for large scale major developments to demonstrate how the new communities will be effectively supported throughout the phasing of developments, including at the outset of development.

### **Community Impact Overview**

- 18.2 The communities that are within close proximity of the proposed development are Horningsea, Milton, Chesterton and Fen Road, Fen Ditton, Waterbeach and Stow cum Quy. The District Council is

generally in agreement with the methodology employed by the Applicant as set out in the Community Chapter of the ES [Doc 5.2.11] The District Council considers that some of the impacts are beneficial to local communities. However, there are other impacts that will not have a positive impact.

#### *Construction Positive Community Impacts*

- 18.3 During construction of the proposed ReWWTP and Waterbeach pipeline, there would be a beneficial impact on the economy through the provision of employment opportunities through supply chain benefits to the economy.

#### *Construction Neutral Community Impacts*

- 18.4 There are neutral impacts in respect of temporary closures to the public rights of way network [Doc Ref. 4.6] [AS-017]. These include closures to footpath 85/6 (parallel to the east bank of the River Cam south of the A14 road bridge) which will be temporarily closed for a period of up to 6 months during construction. It is also noted that there would be long diversions due to the temporary closure of some footpaths including footpath 85/8. Recreational users of Low Fen Drove Way, including PRoW 85/14 and PRoW 130/17 will experience temporary disruption during construction of the temporary access road from Low Fen Drove Way into the land required for the construction of the permanent access to the proposed ReWWTP.
- 18.5 Whilst the impact of these temporary closures will impact non-motorised users in this area, it is accepted that this is only a short-lived disruption that would come to an end as construction concludes within that part of the site.

#### *Construction Negative Community Impacts*

- 18.6 The District Council considers that there are likely to be negative impacts for residents of Low Fen Drove Way during construction. Due to the increased number of construction vehicles, residents may experience temporary delays along Low Fen Drove Way itself.

- 18.7 There will also be a negative impact on a local business, CBS Automotive, a vehicle installation business located on Clayhithe road to the south of the village of Clayhithe. The construction of the proposed Waterbeach pipeline would temporarily require land from CBA Automotive. Although access to the business will be maintained, the temporary use of land will not inhibit CBS Automotive from being able to continue to operate. This is still nevertheless considered to be a negative impact.

*Construction Community Mitigation*

- 18.8 As set out above, the District Council supports the inclusion of an on-going Community Liaison Plan as proposed in [Doc Ref 7.8] [AS-132] with the status of this as a live document.

*Operational Positive Community Impacts*

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

*Operational Neutral Community Impacts*

- 18.10 The District Council notes that the Applicant proposes to provide a Discovery Centre for the community [Doc ref. 5.2.11] [AS-028] to aid in water education for schools and local groups and is supportive of this initiative.
- 18.11 The Applicant is the largest regulated water and water recycling company in England and Wales and it would be helpful to see how communities and schools will be engaged perhaps by reference to other existing operations.
- 18.12 A more detailed indicative programme setting out how the temporary visitor centre (and permanent discovery centre) will be promoted and managed as well as how regular footfall to the facility would be fostered should be provided as part of a scheme to be agreed. As part of this the District Council would seek confirmation or an undertaking that this

would be resourced by the Applicant so as to result in lasting benefit to the community.

*Operational Negative Community Impacts*

- 18.13 The District Council notes the inclusion of the disused railway [Doc. Ref. 5.4.8.14 [AS-066] which is supported in respect of biodiversity and landscape enhancements. However, further clarity is required on the extent of the proposed new public bridleway and how this will be accessed by the public, in perpetuity, as it is currently being proposed as a permissive path. This undermines the viability of the proposed 9.3km walking loop. It is the District Council's view that the bridleway should be made fully accessible for all non-motorised users and as part of the highway network.
- 18.14 The District Council recognises nevertheless that this is a matter for the County Highway Authority and defers to their consideration of this matter. Operational Community Mitigation
- 18.15 As noted, the District Council supports the inclusion of an on-going Community Liaison Plan (CLP) with the status of this as a live document as set out in the draft CLP [Doc Ref 7.8] [AS-132].

*Requirements - Community*

- 18.16 The District Council recommends that cycle parking at the new facility would need to be sufficient to cater for staff requirements and should accord with adopted cycle parking standards. This can be secured by way of DCO requirements.

**Compliance with Policy**

- 18.17 The proposed development would, in the District Council view, accord with the principles of Policy SC/4 of the SCDC Local Plan. It has suggested a number of matters should be addressed further as set out above.

## **19. TOPIC 13 - Public Rights of Way**

### **Policy Context - Public Rights of Way**

- 19.1 Policy TI/2 of the SCDC Local Plan (Planning for Sustainable Travel) seeks to promote the provision of safe, direct routes within permeable layouts that facilitate and encourage short distances by walking and cycling within communities. New cycle and walking routes that connect to existing networks including the wider public rights of way network to strengthen connections into the wider countryside.

### **Public Rights of Way Overview**

- 19.2 There are a number of green space and recreational areas, linked by an extensive Public Right of Way (PRoW) network surrounding the ReWWTP. The River Cam is used by groups for angling as well as for walking along the PRoW located on both the eastern and western banks. PRoW 85/6 [Doc Ref. 4.6] [AS-017] provides a connection along the eastern bank of the River Cam from Horningsea to Fen Ditton. This footpath changes into PRoW 130/3 (a byway) and PRoW 85/5 (a byway), providing access to the B1047; and PRoW 85/2 and PRoW 85/1 (footpaths) provide access from the south part of Fen Ditton to High Ditch Road [ Doc Ref. 4.6] [AS-017].
- 19.3 Horningsea is linked to other areas of recreation and settlements by a network of PRoWs. To the south of the settlement, the Honey Hill area is accessible from Low Fen Drove Way. This area forms part of the Eastern Fen Edge Landscape Character Area and is used by local residents as part of a walking and cycling loop. PRoW 130/1 provides access from Horningsea Road and connects to PRoW 85/7 and PRoW 85/6, the latter of which provides access to the River Cam; and PRoW 162/1 runs along the west of the River Cam. This route provides a connection from Horningsea to Fen Road.

### *Construction Positive Public Right of Way Impacts*

- 19.4 It is noted however, that PRoWs come under the jurisdiction of Cambridgeshire County Council who will be able to provide a fuller assessment on this matter. From the District Council's perspective however, there are no positive construction impacts in respect of PRoWs that have been identified by the District Council.

### *Construction Neutral Public Right of Way Impacts*

- 19.5 There are no neutral construction impacts in respect of PRowS that have been identified by the District Council. However, public rights of way come under the jurisdiction of Cambridgeshire County Council who will be able to provide a fuller assessment in this matter.

*Construction Negative Public Right of Way Impacts*

- 19.6 The District Council notes that there may be an impact on pedestrians due to PRowS diversions and temporary closures during construction. Footpath 85/6 (parallel to the east bank of the River Cam south of the A14 road bridge) [Doc Ref. 4.6] [AS-017] will be temporarily closed for a period of up to 6 months during construction. Footpath 85/8 will also be closed for a period of time [Doc Ref. 5.2.19 [AS-038.] Recreational users of Low Fen Drove Way, including PRowS 85/14 and PRowS 130/17, will experience temporary disruption during construction of the temporary access road from Low Fen Drove Way into the land required for the construction of the permanent access to the proposed ReWWTP.
- 19.7 The District Council acknowledges however that the impact of these temporary closures would only be a short-lived disruption that would come to an end as construction concludes within that part of the site.

*Construction Public Right of Way Mitigation*

- 19.8 The District Council notes that once secondary mitigation in the form of diversions has been applied, the effect on pedestrian delay is not likely to be significant. The District Council recommends measures to ensure that there would be no unnecessary closures of public rights of way once construction activities within a given area have concluded. As this is a matter for the highway authority Cambridgeshire County Council, it is for them to consider what the most appropriate mechanism to secure such mitigation would be.

*Operational Positive Public Right of Way Impacts*

- 19.9 The District Council notes that there will be connections to wider countryside as a result of the proposal. However, PRowS come under the jurisdiction of Cambridgeshire County Council who will be able to provide a fuller assessment on this matter.

### *Operational Neutral Public Right of Way Impacts*

- 19.10 The District Council has not identified any neutral impacts in respect of this aspect of the proposal. Again, as these matters come within the jurisdiction of Cambridgeshire County Council it is they will be able to provide a fuller assessment on this matter.

### *Operational Negative Public Right of Way Impacts*

- 19.11 The District Council has concerns in relation to the new bridleway connection to the north-east of the ReWWTP which is intended to provide 'an enhanced connection for walkers, cyclists and horse riders' [Para.4.3.12 of Doc. 5.2.11 Environment Statement Chapter 11. Community] [APP-043]. It is advised that the bridleway connection will be a permissive path only and not a full bridleway. This allows for the landowner to temporarily limit access to the bridleway if they deem it necessary which restricts open access to members of the public. While the District Council acknowledges that matters relating to PROWs fall under the jurisdiction of the County Council, full bridleway status should be secured for this connection.

### *Requirements - Public Right of Way*

- 19.12 The District Council has not identified any requirements in respect of Public Rights of Way. This is a matter for Cambridgeshire County Council as Highway Authority and the District Council will defer to their recommendations.

### **Compliance with Policy**

- 19.13 The proposed development would in the District Council's view accord with the principles of Policy TI/2 of the SCDC Local Plan

## **20. TOPIC 14 - Highways and Transportation**

### **Policy Context - Highways and Transportation**

- 20.1 Policy TI/2 of the SCDC Local Plan requires that development must be located and designed to reduce the need to travel, particularly by car, and promote sustainable travel appropriate to its location. Developers are required to demonstrate they will make adequate provision to mitigate the likely impacts (including cumulative impacts) of their proposal including environmental impacts (such as noise and pollution) and impact on amenity and health. TI/3 Sets out indicative parking standards and TI/8 relates infrastructure provision to make schemes acceptable in planning terms.

### **Highways and Transportation overview**

- 20.2 The District Council has considered [Doc ref 5.4.2.1] [APP 068] construction movements required for movement of materials, site personnel and construction equipment to the ReWWTP. The movement of excavated material from the area of land required for the construction of the waste water transfer tunnel, the Waterbeach pipeline and the final effluent pipeline to the area of land required for the proposed ReWWTP and landscaping has also been considered as part of the Applicants' Transport Assessment [ES Volume 4 Chapter 19 Appendix 19.3 Transport Assessment [Doc ref 5.4.19.3] [AS-108a].
- 20.3 The District Council notes that there are also construction activities that will interact with existing transport infrastructure (such as existing roads, footpaths, and PRow) due to temporary use of land to install structures such as new pipelines, waste water transfer tunnel and for temporary compound areas. The temporary use of land for haul routes, the open cut excavation crossing Horningsea Road to install the final effluent pipeline; and the use of existing level crossings as part of the construction route have also been considered in the ES [19 Appendix 19.3 Transport Assessment [Doc ref 5.4.19.3] [AS-108a]

#### *Construction Positive Highways and Transportation Impacts*

- 20.4 The District Council has not identified any positive construction impacts. However, as Cambridgeshire County Council is the Highway Authority, SCDC defers to the County Council for their views.

#### *Construction Neutral Highways and Transportation Impacts*



- 20.5 The District Council has not identified any neutral construction impacts. However, as Cambridgeshire County Council is the Highway Authority, SCDC defers to the County Council for their views.

*Construction Negative Highways and Transportation Impacts*

- 20.6 The District Council notes that although the Construction Transport Management Plan (CTMP) indicates that there will be a requirement to avoid vehicle movements during peak hours, short term vehicle movements will be undertaken for 'critical activities' [Doc 5.2.19 para.4.2.52] AS-038]. It is advised that these activities may include concrete pours or direction drilling activities in the peak hours in of the peak construction year. In the opinion of the District Council, further clarity should be provided in respect of what constitutes critical activities and how often they would occur.
- 20.7 The District Council considers that haulage routes should be minimised and avoid peak hour movements and that this should be ensured through a requirement. The routes that are of particular concern to the District Council include:
- Station Road, Waterbeach,
  - Horningsea Road
  - Junction 34 of the A14
  - The Milton Interchange (junction 33)
  - The A14 section between Junction 33 and Junction 34

*Operational Positive Highways and Transportation Impacts*

- 20.8 The District Council has not identified any operational positive effects. However, this is a matter that is under the jurisdiction of the County Council Highway Authority. As such, the District Council would defer to them for a fuller assessment of impacts.

*Operational Neutral Highways and Transportation Impacts*

- 20.9 There are no neutral impacts in relation to Traffic and Transport that have been identified by the District Council. However, this is a matter that is under the jurisdiction of the County Council Highway Authority. As such, the District Council would defer to them for a fuller assessment of impacts.

### *Operational Negative Highways and Transportation Impacts*

- 20.10 Despite the addition of a small amount of operational traffic (relative to the total traffic on the surrounding road network), a major cumulative effect is identified on driver delay at the Horningsea Road / A14 on-slip junction (southbound on Horningsea Road, right-hand turn into the on-slip) in the AM And PM peak which is significant. This occurs as a result of background traffic growth in 2038 in the peak hours.

### *Operational Mitigation Highways and Transportation Measures*

- 20.11 The District Council notes that there may be potential for cumulative effects arising from impacts of the ReWWTP in combination with impacts of other proposed or consented development projects that are not yet built or operational. The construction of Waterbeach New Town East has the potential to overlap with the construction of the proposed development and may cause cumulative effects along the A10, Denny End Road and Bannold Road.
- 20.12 It is for Cambridgeshire County Council, as the Highway Authority, to determine whether the cumulative effect of the simultaneous construction of the three developments would have a significant impact on the highway network and if so, what level of mitigation would be appropriate.

### *Requirements - Highways and Transportation*

- 20.13 Any DCO requirements in relation to Highways and Transportation impacts are a matter for Cambridgeshire County Council as the Highway Authority and the District Council defers to its recommendations.

### **Compliance with Policy**

- 20.14 The District Council would defer to Cambridgeshire County Council as the relevant highway authority as to whether the application and the proposed development would meet SCDC Local Plan Policy TI/2. 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.

## 21. TOPIC 15 - Climate Resilience

### Policy Context - Climate Resilience

- 21.1 Policy CC/1 (Mitigation and Adaptation to Climate Change) of the SCDC Local Plan requires development proposals to demonstrate and embed the principles of climate change mitigation and adaptation into the development. The policy goes on to state that Applicants must submit a Sustainability Statement to demonstrate how these principles have been embedded into the development proposal. The level of information provided in the Sustainability Statement should be proportionate to the scale and nature of the proposed development.
- 21.2 Policy CC/3 (Renewable and Low Carbon Energy in New Developments) of the SCDC Local Plan requires proposals for new non-residential buildings of 1,000m<sup>2</sup> or more will be required to reduce carbon emissions by a minimum of 10% (to be calculated by reference to a baseline for the anticipated carbon emissions for the property as defined by Building Regulations) through the use of on-site renewable energy and low carbon technologies. The policy states that this could be provided through the installation of an integrated system or site wide solutions involving the installation of a system that is not integrated within the new building. For a site wide solution, evidence must be submitted demonstrating that the installation is technically feasible and is capable of being installed.

### Climate Resilience Overview

- 21.3 The District Council has assessed the possible impacts identified in the Climate Resilience Chapter of the ES [Doc. Ref. 5.2.9] [APP-041] from a sustainable construction view (rather than a flooding or drainage), and therefore the District Council's comments focus on the receptor identified as physical infrastructure.
- 21.4 The possible effects on the proposed development of a changing climate are identified as:
- Warmer, wetter winters
  - Hotter, drier summers
  - More extreme weather events

#### *Construction Climate Resilience Impacts*

- 21.5 The District Council notes that the impacts of climate change on the construction phase are not in the scope of the ES assessment as it is anticipated that construction will be complete by 2028. The impacts of potential future climate change will therefore not be felt during the construction phase. The Applicant has presented weather resilience measures for the construction phase.

#### *Construction Positive Climate Resilience Impacts*

- 21.6 There are no positive construction impacts in respect of this development.

#### *Construction Neutral Climate Resilience Impacts*

- 21.7 The District Council notes that climate resilience effects have not been identified for the construction phase as the climate will not have significantly changed within the timescales of construction. The assessment of the construction phase is outside of the scope of this assessment.

#### *Negative Construction Impacts on Climate Resilience*

- 21.8 There are no negative constructions impacts in respect of this development as the climate will not have significantly changed within the timescales of construction.

#### *Construction Climate Resilience Mitigation*

- 21.9 The District Council notes that weather resilience measures for the construction phase have been outlined in Chapter 9 of the ES [Doc. Ref. 2.8.25] and it is important that these follow through into a Construction Environmental Management Plan (CEMP) as the proposed development progresses.

#### *Operational Positive Climate Resilience Impacts*

- 21.10 No positive operational impacts have been identified.

### *Operational Neutral Climate Resilience Impacts*

21.11 No neutral operational impacts have been identified.

### *Operational Negative Climate Resilience Impacts*

21.12 Negative effects of higher temperatures during the operational life of the development include:

- **Structural damage** - structural damage at higher maximum summer temperatures may occur due to expansion and thermal loading of metallic features and concrete structures, particularly for above ground structures such as pipelines, and parts of tunnels and parts of shafts that are above ground.
- **Rapid deterioration of materials** - More rapid deterioration of structures or component parts may also occur due to higher average temperatures. This may lead to increased maintenance costs to address structural damage and disruption to operations of the Proposed Development during repairs.
- **Risk of overheating and fire** - Projected higher maximum summer temperatures will have effects on mechanical and electrical equipment that may include increased risk of overheating and fire risk, leading to safety risks and Waste Water Treatment (WWT) process failure.
- **Risk of mechanical equipment failure** - Overheating and fire risk of mechanical and electrical equipment at higher maximum temperatures leading to equipment and WWT process failure
- **Waste Water Treatment process failure** - Projected higher maximum summer temperatures will have effects on mechanical and electrical equipment that may include increased risk of overheating and fire risk, leading to safety risks and WWT process failure. This is likely to primarily relate to the summer maximum temperatures which is projected to exceed the design parameter of 40°C in the 2090s.
- **Reduced efficiency of equipment** - Reduced operating efficiency of Combined Heat and Power (CHP) and boiler units due to high ambient temperatures.

21.13 Negative impacts of frequency and intensity of heavy rainfall and extreme weather events:

- **Increased surface water flow causing erosion of soils and structures** - Future rainfall projections will increase the risk of surface water flows from heavy rainfall events leading to erosion of soils and other materials around structures, making them vulnerable to damage. There will additionally be an increase in the risk of weakening and washout of the soil around culverts that support primary structural features, leading to structural damage.
- **Infrastructure water damage** - Increased winter rainfall due to climate change increases the risk that the stormwater volumes will exceed the capacity of the Storm Water Management Unit. There is also a risk that storm water may overwhelm the waste water network, causing foul water flooding at inlets or at locations upstream of the proposed development, which is considered within this section.
- **Reduced design life** - An increase in rainfall intensity and standing water (at ground level and on flat roofs) may increase scour and erosion of buildings and structural elements, leading to increased risk of water ingress or egress from structures, building damage and reduced design life.
- **Pipework failure** - Increased frequency and intensity of heavy rainfall and extreme weather events may increase the risks of surface water flows leading to erosion of soils around structures, weakening and washout of the soil around culverts that support primary structural features, infrastructure damage and reduced design life, water ingress or egress from structures, likelihood of pipework failure when transferring waste water, erosion and damage to river banks around the outfall, soil erosion in the network leading to increased siltation and erosion within pipework.
- **Risk of ground movement and subsidence of soils leading to foundation damage** - Greater seasonal range between wetter winters and drier summers may increase the risk of ground movement and subsidence of soils leading to damage of buried pipes and foundations. After considering the application of primary and tertiary measures, this effect is considered to be minor and not significant.

*Operational Climate Resilience Mitigation*

21.14 The Applicant has proposed the following primary mitigation measures during operation of the ReWWTP.

- Proposed development able to manage higher storm flows.
- Able to meet evolving permitting requirements even in the case of low flow or drought conditions.
- Designed with capacity to add additional storm storage, heat recovery and cooling systems and treatment infrastructure.
- Layout and design to allow future work force to remotely, digitally access proposed development during storms and flood.

21.15 The Applicant has proposed the following secondary and tertiary mitigation measures which are based primarily upon the implementation of management plans looking at:

- Specification of replacement and upgraded equipment to reflect future projected temperatures.
- Inspection regimes of potential climate vulnerable plant
- Contingency planning for staff welfare during extreme weather events

21.16 After the application of the above suggested mitigating measures, The District Council considers the impacts of climate to be minor and not significant in all cases.

*Requirements - Climate Resilience*

21.17 The District Council notes that secondary mitigating measures mainly focus on management plans which look at monitoring and management of impacts during the operational phase. The District Council agrees that these should be excluded from the assessment. However, the management plans outline more responsive measures rather than proactive. It is important that they are secured given the role they play in ensuring the proposed ReWWTP is climate resilient when operational.

21.18 The District Council acknowledges that the focus of the ES is very much on the development of the operational structures of the wastewater treatment facilities, however it is important to ensure high standards for employee and other populated buildings.

21.19 The District Council therefore considers that the following should be secured through requirements or be included in a single management plan to be sought through a requirement relating to sustainable construction measures:

- Optimum layout and orientation
- Optimum fabric performance
- Optimum use of the cooling hierarchy

### **Compliance with Policy**

21.20 The District Council considers that the proposed development would meet the requirements of Policy CC/1 and Policy CC/3 SCDC Local Plan.

## **22. Conclusions**

22.1 The LIR has identified relevant national and local plan policies. It has identified those South Cambridgeshire Local Plan policies which it considers may be relevant and 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.

22.2 The District 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.

22.3 The LIR for the District 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 harm of the openness of the Green Belt site and surrounding landscape character, adverse harm to the significance of heritage assets such as Biggin Abbey and 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.

22.4 The LIR 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. 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.

22.5 The District 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 District 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.5,500 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.
- 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.

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

22.7 As such the District 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 <sub>x</sub>	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	Ordnance 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 2003	Road Vehicles (Authorisation of Special Types) (General) Order
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.scamb.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.scamb.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](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.%2013%20-%20Chronology%20of%20feasibility%20investigations%20of%20redevelopmen%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>

**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](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/GCLPDSustainabilityAppraisalNonTechSummaryAug21v2Nov21.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://scambsmoderngov.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%20Ctee%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://scambsmoderngov.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://scams.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.scams.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](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](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>

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