

# **Cambridge City Council**

## **Responses to The Examining Authority's written questions and requests for information (ExQ1)**

**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



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## 1. GENERAL AND CROSS TOPIC QUESTIONS

### Q. NO: 1.13

**Directed to: Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC)**

**Question: Planning applications**

*Please provide an update on any planning applications that have been submitted or determined since the DCO application was submitted that could either affect the Proposed Development or be affected by the Proposed Development and whether these would affect the conclusions reached in the ES.*

**Answer:**

**CCC** - Please refer to Appendix 1, which sets out the relevant applications that have been submitted to or determined by CCC since the submission of the DCO.

### Q. NO: 1.14

**Directed to: CCC, SCDC Cambridgeshire County Council (CCoC), Interested Parties (IPs)**

**Question: Other Projects and Proposals**

*Are there any other projects that are not documented in the ES that are relevant and need to be considered by the ExA? If so, please identify these projects and the public information source(s) from which you have made your assessment that they are relevant.*

**Answer:**

There are no other projects that are relevant to this proposal that have not been documented in the ES.

### Q. NO: 1.15

**Directed to: Applicant, CCC, SCDC**

**Question: Previous planning applications –Waste Water Treatment Plant (WWTP) Relocation**

*Please provide details of any planning applications submitted previously regarding a potential move of the existing WWTP to the proposed site or any other site, as alluded to in some RRs (e.g. [RR-121, RR-304 and RR-178]). Please include full details of what was proposed, the outcome of the application and full reasoning behind the decision made.*

**Answer:**

**CCC** - The Council understands the question is directed to suggestions made in the above RRs to past applications for permission to relocate the sewage works to Honey Hill and which were said to have been “previously declined”. The Council can confirm there have been no such planning applications. There have been consultations and investigations undertaken by various parties over the years to determine the feasibility of the relocation of the WWTP to different sites. This included the site selection process by Anglian Water that took place over the last 5 years. There have not been any previous planning application submissions.

**Q. NO: 1.16**

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**Directed to: Applicant, CCC, SCDC**

**Question: Potential conflicts of interests**

*A number of RRs (e.g. [RR-194, RR-225 and RR-262]) suggest CCC’s and SCDC’s involvement in the Examination gives rise to a conflict of interest given land interests and desire for the redevelopment of the existing WWTP site and wider area. Please comment on this.*

**Answer:**

It is correct that Cambridge City Council owns part of the land covered by the Order and which is also the subject of the proposed by the draft NECAAP. SCDC does not own any of the land the subject of the DCO or indeed the subject of the NECAAP proposals.

The City Council and SCDC (as is made clear in their representations to this DCO application) are acting in accordance with their statutory roles as local authorities for the area within which the DCO falls and hence as statutory Interested Parties in accordance with the Planning Act 2008.

The City Council in its landowner capacity has separate legal representation to its other statutory capacities. To be clear it is often the case that a local authority which owns land within its own administrative area will need to act separately and be treated as a separate entity when seeking to develop that land.

To reiterate, the City Council and SCDC support the principle of the development, but the final decision making is clearly within the hands of the ExA and the Secretary of State and the Councils including the County Council all clearly defer to that as is appropriate.

## 2. PRINCIPLE (INCLUDING POLICY AND LEGISLATIVE CONTEXT, NEED AND ALTERNATIVES)

**Please note for Section 2 Only:** 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).

### Q. NO. 2.1

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**Directed to: Applicant, IPs**

**Question: National policy**

- a) A revised NPPF was published on 5 September 2023. Please address any implications this may have for the application and assessments undertaken.
- b) The National Policy Statement for Water Resources Infrastructure came into force on 18 September 2023. Please address any implications this may have for the application and assessments undertaken.
- c) Are you aware of any other updates or changes to national policy or guidance which may be relevant to the determination of this application that have occurred since it was submitted? If yes, what are these changes and what are the implications, if any, for the application?

**Answer**

- a) South Cambridgeshire District Council (‘SCDC’ or ‘the District Council’) and Cambridge City Council (‘the City Council’) do not consider that there are any changes to the NPPF published in September 2023 that have implications for this DCO application.
- b) Note below:
  1. The Councils note the designation of the National Policy Statement for Water Resources Infrastructure (‘NPSfWR’) in their LIRs. This NPS sets out the need and Government’s policies for development of nationally significant infrastructure projects for water resources in England.
  2. It states that it provides planning guidance for applicants of nationally significant infrastructure projects for water resources, as defined under sections 27, 28 and 28A of the Planning Act 2008 (‘the Planning Act’). It is noted that at para 1.5.1 of the NPSfWR that it is “*separate from the National Policy Statement for Waste Water and section 29 of the Planning*



*Act, which sets out the definition of nationally significant waste water infrastructure”.*

3. The proposed development is waste water infrastructure which is to be treated as development of national significance for which development consent is required as consequence of the section 35 Direction. Setting aside the issue which has been raised as to whether the NPSWW itself has: “*effect in relation to development of the description to which the application relates*” it would appear that the NPSfWR by its own terms does not have or was not intended to have such effect in respect of a scheme such as this but is a relevant and important matter relevant to the Secretary of State's decision under section 105 of the Planning Act 2008.
- c) SCDC and the City Council do not consider there are any changes or updates to national policy and guidance which may be relevant to the determination of this application since it was submitted.

## **Q. NO. 2.2**

**Directed to: Applicant, CCC, SCDC, CCoC, IPs**

**Question: National policy**

*NPSWW was designated in 2012. Taking account of any legislative and policy changes since that time:*

- a) *do you consider that there has been a significant change in any of the circumstances on the basis of which any of the policy set out in the statement was decided? If yes, which?*
- b) *Are the policy provisions relating to ‘factors for examination and determination of applications’ and the ‘generic impacts’ up-to-date or do any need to be supplemented or disregarded? Please provide justification for your response.*
- c) *Given that the Proposed Development is not one of the schemes that is named in NPSWW, which factors noted in NPSWW relating to the demonstration of need for waste water infrastructure should be taken into account in the determination of this application?*
- d) *Are there any other considerations relating to the need for waste water infrastructure that should be taken into account which are not noted in NPSWW? If yes, what are they and why should they be taken into account?*
- e) *Does NPSWW allow for developments that are not waste water infrastructure, such as housing, to form part of the need case for waste water infrastructure? If yes, please explain your response.*

- f) *Is there any other policy, guidance or legal precedent which suggests that developments that are not waste water infrastructure, such as housing, can form part of the need case for waste water infrastructure? If yes, please explain your response.*

**Answer:**

- a) Note below:
1. There are a number of wider legislative and planning policy changes that have occurred since the NPSWW was designated in 2012 such as Brexit and its consequences and the amendment to the Climate Change Act in 2019, committing the UK to 'net zero' by 2050.
  2. With regard to the NPSWW itself it has not seemingly been kept under review every five years as expected (see NPSWW 1.1.5).
  3. The evidence base to this NPS as listed at NPSWW 1.1.3 including the Appraisal of Sustainability (AoS) incorporating the requirements of the Strategic Environmental Assessment (SEA) Directive; Habitats Regulation Assessment (HRA); Impact Assessment (IA) and Equalities Impact Assessment will clearly be out of date. In addition, the two specific Waste Water infrastructure schemes that are addressed under the NPS have progressed.
  4. That said neither SCDC nor the City Council can identify what the ExA specifically seeks which is *"significant change in any of the circumstances on the basis of which any of the policy set out in the statement was decided"*.
  5. The ExA and the Secretary of State's decision must be based upon current policy and legislation in any event.
- b) SCDC and the City Council is not in a position to suggest that there are specific amendments that should be made to the NPS.
- c) 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.
1. At NPSWW 3.1.3 and 3.1.4 states that the ExA and Secretary of State when *"considering any proposed development, and in particular when weighing its adverse impacts against its benefits... maker should take into account:*
    - *its potential benefits including its contribution to meeting the need for waste water infrastructure, job creation and any long-term or wider benefits; and*

- *its potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.*
2. NPSWW 3.1.4 states:
    - *In this context, the decision maker should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels. These may be identified in this NPS, in the application or elsewhere (including in local impact reports).*
  3. As the SCDC and City Council has made clear, it supports the principle of the proposed development because of the inter alia clear socio economic and long-term benefits which flow from the scheme.
- d) With regard to whether there are any other considerations relating to the need for waste water infrastructure that should be taken into account which are not noted in NPSWW the ExA is referred to the section 35 direction and the Secretary of States reasons for issuing the direction.
- e) With regard to what is relevant to the Secretary of State’s decision making, how the NPSWW helps direct that decision and in particular what matter can be taken into account SCDC and the City Council would refer to the answers above.
- f) The concept of ‘enabling development’ is a well-known one in planning and which is relevant to the circumstances surrounding this development proposal. In the context of the proposed development SCDC and the City Council would refer to the section 35 direction and the Secretary of States reasons for issuing the direction.

### **Q. NO. 2.3**

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**Directed to: Applicant, CCC, CCoC**

**Question: Effect of NPSWW**

*Section 104(2) of the Planning Act 2008 (PA2008) says, in relation to an application for an order granting development consent, that in deciding the application the Secretary of State must have regard to any national policy statement which has effect in relation to development of the description to which the application relates.*

*RR [RR-167] states that in relation to EFW Group Limited v Secretary of State for Business, Energy and Industrial Strategy [2021] the courts have confirmed that a s35 Direction does not in itself make the application an NSIP and therefore that the presumption in favour of development does not apply and s105 does apply.*

*Similarly, RR [RR-151] states that: There is therefore no 'presumption of need' for the proposed development. The project is not in WINEP and policies in the NPS on Waste Water 2012 should be given little weight. The application should be determined under the provisions of s105 of the Planning Act 2008, not s104. The policies against which it should be tested are in the NPPF and the adopted local plans. The emerging NE Cambridge Area Action Plan and the Greater Cambridge Local Plan are at a relatively early stage in preparation and the latter is subject to ongoing review of its overall scope and strategic direction, so should be given little weight.*

- a) In relation to this application, does NPSWW have effect?*
- b) Does NPSWW set out a presumption in favour of development in relation to only those projects named in NPSWW or within the Environment Agency's National Environment Programme (NEP)?*
- c) Must a need be demonstrated for projects which are not named in NPSWW or the NEP?*
- d) Should this application be determined under s104 or s105 of PA2008?*
- e) If this application was determined under s105 of PA2008, should NPSWW be considered as important and relevant?*
- f) If you consider that NPSWW to be important and relevant to a s105 determination, should the weight to be given to any of the considerations in NPSWW differ materially from a situation where the application is considered under s104? If so, which considerations, how would the weight differ and why would the weight differ? Please justify your answers.*

**Answer:**

- a) Please note below:
  1. With regard to the guidance provided by Mr Justice Dove in *EFW Group Ltd -v- Secretary of State for Business, Energy and Industrial Strategy [2021] EWHC 2697 (Admin)* SCDC and the City Council would note that the case involved considering two separate but proximate energy from waste related schemes - one fell within the relevant statutory limitations or criterion within s15 of the Planning Act 2008 and the other did not and not fall within the definition of an NSIP.

2. The latter was the subject of s35 Direction *“thereby bring it within decision making processes of the 2008 Act”* [4]. Because the schemes were proximate, they were considered under a single DCO application.
3. The local waste planning authority had argued that the scheme that was the subject of the s35 direction and other *“parts of the application which were not an NSIP should be determined in accordance with the development plan”* [15] whereas it was accepted that the other scheme was one where there was a relevant NPS which had effect, and which included NPS EN-1. That NPS specifically recognised the need in general terms for energy generating infrastructure and therefore it was held that a presumption in favour of granting consent arose (subject to any other considerations).
4. As the Councils understand it, that NPS did not refer to s35 and the consequences of a s35 direction in respect of energy infrastructure (compared with the current EN1 NPS). The section 35 direction in EFW also did not refer to the NPS and how it should be applied. The Secretary of State later conceded that the approach that should have been adopted was to apply the s104 decision making process to the ‘NSIP’ scheme (i.e. where EN-1 had effect) and that the other s35 scheme should be decided in accordance with s105. This was because by its terms the NPS did not have effect in respect of that s35 scheme. It was not simply because a s35 scheme is by definition not an ‘NSIP’.
5. To that end a presumption in favour of a scheme that is the subject of a DCO (whether it be as a consequence of a s35 Direction or not) will arise if an NPS has effect in respect of that scheme and then only if it is concluded that it accords with the NPS. Again, this is not simply because a scheme is subject to a S35 Direction or not or indeed whether an NPS has effect in relation to a scheme.
6. The ExA will be aware that it is open to the Secretary of State when issuing a s35 Direction specifically to direct that an NPS should be treated as having effect (see e.g. the case of the Aquind Interconnector DCO scheme).
7. What was clear in any event from the EFW is that it is either s104 or s105 that applies but that there is no ‘reversion’ as it were to applying an approach that gives primacy to the development plan in the place of the NPS mimicking an approach under s38(6) of the Planning and Compulsory Purchase Act 2004 and s70 of the Town and Country Planning Act 1990.
8. The Councils would therefore direct the ExAs and Secretary of State’s attention both to the terms of the NPS itself and the s35 Direction. The Councils however consider that establishing whether the NPS has *“effect in relation”* to the proposed development or not, in accordance with section

104 or section 105 of the Planning Act 2008, rests with the ExA and Secretary of State.

- b) The ExA is referred to the answer above in answer to this question.
- c) The ExA is referred to the answer above in answer to this question.
- d) The ExA is referred to the answer above in answer to this question.
- e) The ExA is referred to the answer above in answer to this question.
- f) The ExA is referred to the answer above in answer to this question.

## **Q. NO. 2.4**

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**Directed to: Applicant, CCC, SCDC**

**Question: National policy**

*ES Chapter 16 para 1.3.5 [APP-048], under the heading 'National Planning Policy for Waste 2014' (NPPW), states that - This sets out to identify need for waste management facilities and requirement for Local Authorities to identify in their Local Plans suitable sites and areas for waste management facilities (Department for Communities and Local Government, 2014).*

*NPPW states at para 3 that when preparing Local Plans waste planning authorities should - undertake early and meaningful engagement with local communities so that plans, as far as possible, reflect a collective vision and set of agreed priorities when planning for sustainable waste management, recognising that proposals for waste management facilities such as incinerators can be controversial;... and consider the extent to which the capacity of existing operational facilities would satisfy any identified need.*

*a) Why did the local authorities not identify a suitable site for a replacement WWTP through their local plan process?*

*b?) Did the Applicant advocate that the local authorities identify a site? If yes, please provide evidence of this.*

**Answer:**

- a) The history of the Minerals & Waste Plan and the approach adopted therein is set out in the County Council's LIR as the Waste Planning Authority and the question which appears to be directed at whether the appropriate policy response was adopted by the County Council should clearly be answered by the County Council



- b) The relocation of the CWWTP to a different site and any allocation of a new WWTP if it is appropriate so to do is clearly outside the remit of the City and District Councils and is properly to be addressed in policy terms through the Minerals and Waste Local Plan prepared by the County Council and would never have been through the terms of the existing 2018 Local Plans or indeed the emerging GCLP and NECAAP. This is addressed in both the SCDC and City Council's Local Impact Report at paragraphs 2.2 and 6.012.
- c) N/A

## Q. NO. 2.5

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**Directed to: CCC, SCDC**

**Question: The development plan**

- a) *Please provide full copies of any relevant adopted or emerging Development Plan policies (or other relevant documents e.g. North East Cambridge Area Action Plan) that you have referred to in any of your submissions. Should you refer to any additional Development Plan policies at any time in your future submissions (for example in a Local Impact Report) then, if they have not already been provided, please also submit copies of these into the Examination.*
- b) *Have there been any relevant updates to the statutory / emerging Development Plan(s) since the compilation of the application documents?*
- c) *Are the local planning authorities content with the Applicant's policy analysis?*

**Answer:**

- a) The Councils have provided a document library alongside the LIRs that include links to all referenced documents, including adopted and emerging local development plans.
- b) There have been no relevant updates to the statutory / emerging development plan(s) since the compilation of the application documents.
- c) The Councils consider that the applicant has referenced all relevant policies within the materials submitted with the application. The ExA is referred to the LIRs, which discuss compliance with the policies and the adequacy of the proposed mitigation measures.

## Q. NO. 2.6

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**Directed to: Applicant, CCC, SCDC, CCoC**

**Question: *The development plan***

*Please clarify which development plan policies / documents (adopted and emerging) are relevant to this DCO application and confirm whether the Proposed Development would be fully compliant with these policies and if not, which policies would it be in conflict with and why (this could form part of Local Impact Reports)?*

**Answer:**

1. As foreshadowed in the question, the Councils have addressed this question in their LIRs. The Councils have provided a document library alongside the LIRs that include links to all relevant documents, including adopted and emerging local development plan policies. The areas where there would be potential policy conflict with such policies have been identified in the LIRs and the rationale for their inclusion is set out.

## Q. no.2.7

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**Directed to: Applicant, CCC, SCDC**

**Question: *The development plan***

*Is it correct that neither the Cambridge Local Plan 2018 nor the South Cambridgeshire Local Plan 2018 require the relocation of the existing WWTP in their policies relating to NEC?*

**Answer:**

1. Yes, it is correct that neither of the adopted 2018 Local Plans require the relocation of the existing WWTP. They include mirror policies that identify the potential strategic development opportunity for the Cambridge Northern Fringe East for a high-quality, mixed-use development with 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.
2. The supporting text says that the viability and feasibility of redevelopment of the CWWTP elsewhere or on the current site will be considered in preparing the Area Action Plan. This is also a matter that is addressed in the LIRs (see paragraphs: 6.25-6.27 of both LIRs).



## Q. no 2.8

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**Directed to: Applicant, CCC, SCDC**

**Question: The development plan**

*If development proposals for the existing WWTP site came forward in the absence of a replacement WWTP being secured, would development plan policy indicate that planning permission should be refused on the basis that the existing WWTP is essential infrastructure and should be protected or re-provided? If yes, please indicate which policy/ies would protect the existing WWTP.*

**Answer:**

1. Depending upon the nature of any development proposals that came forward for the existing WWTP site, if they related to 'non county' development proposals e.g. housing, and were submitted under the Town and Country Planning Act 1990 to develop the existing WWTP site, then the decision would be for the City Council and SCDC (via their Joint Development Control Committee, which is responsible for determining planning application on strategic sites on the edge of Cambridge that straddle the administrative boundary), or in the alternative for the County Council.
2. In considering the principle of any redevelopment proposals that would result in the loss of the existing WWTP, SCDC and the City Council would have regard to Policy 11 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021). This states that Water Recycling Areas are essential infrastructure and the Minerals and Waste Policies Map shows the CWWTP as a Water Recycling Area under this. The supporting text to Policy 11 states that Policy 16: Consultation Areas, is to be read in conjunction with Policy 11. Policy 16 seeks to ensure that water recycling centres are protected from development that would prejudice the operation of the facility and sets a buffer around WRAs of 400m, which is also shown on the Minerals and Waste Local Plan Policies Map. In the absence of evidence of a replacement WWTP coming forward a redevelopment proposal would clearly lead to conflict with those policies.

## Q. no 2.10

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**Directed to: Applicant, CCC, SCDC**

**Question: Local planning policy – allocation of existing WWTP Site**

*Please provide:*

- a) a concise chronology setting out the plan-making stages from the time when the existing WWTP site was first proposed for redevelopment;*
- b) confirmation of who first proposed redevelopment of the site;*
- c) any representations that were made by or on behalf of Anglian Water Services Limited or by any other party which highlighted the need to identify a site for a replacement WWTP if the existing WWTP was to be allocated for development;*
- d) any responses to representations advocating the identification of a site for a replacement WWTP, or records of decisions by the Council in respect of the same (for example an explanation of why the Council did not think it necessary to allocate a site for a replacement WWTP); and*
- e) any information that was submitted by Anglian Water Services Limited to inform the local plan / North East Cambridge Area Action Plan (NECAAP) process in respect of its locational requirements for a replacement WWTP.*

**Answer:**

- a) The chronology of plan-making from when the CWWTP site was first identified for redevelopment is set out in both Councils' LIRs at paragraphs 6.4 to 6.24
- b) 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. See the LIR, paragraph 6.7 and Appendix 1, GCSP-18, Chronology of the feasibility investigations of redevelopment of the Cambridge Waste Water Treatment Plant, page 2. For completeness, an extract from the Cambridge Local Plan 1996 is attached as Appendix 4 to this document, which refers to the 1992 feasibility study in the section on Cambridge Northern Fringe at paragraph 10.97 (note there is a layout issue and paragraph 10.97 starts at the bottom of column 1 and ends at the bottom of column 2).
- c) Note below:
  1. No representations were made by or on behalf of Anglian Water Services Limited that highlighted the need to identify a site for a replacement WWTP if the existing WWTP was to be allocated for development.

2. Whilst there were no representations made by any other party to the emerging GCLP explicitly highlighting a need to identify a site for a replacement WWTP if the existing WWTP was to be allocated for development, there were representations relating to Anglian Water's proposed relocation of the CWWTP to Honey Hill. The GCLP Consultation Statement (January 2023) published with the Development Strategy Update summarised objections received to development at North East Cambridge due to reliance on relocation of the Waste Water Treatment Plant (WWTP) and concerns for the environmental and wellbeing impacts of the relocation of the WWTP to a Green Belt site. Comments questioned whether the relocation of the WWTP was a 'requirement' of the plan or not, and due to these concerns thought that the North East Cambridge Area Action Plan and this policy should be reconsidered. An extract from the GCLP Consultation Statement relating to Policy S/NEC: North East Cambridge and the issue relating to relocation of the CWWTP is included at Appendix 2 (summarised on pages 137-138).

d) Note below:

1. As set out at (c), no representations were made by or on behalf of Anglian Water Services relating to an alternative site for the existing CWWTP if the site were allocated for development and as such there was no Council response.
2. As set out at (c), representations were received to the GCLP First Proposals consultation in 2021 relating to relocation of the CWWTP to Honey Hill. The response to representations in the GCLP Consultation Statement (on page 139, see Appendix 2) states that: "The impact of the relocation of the WWTP to an off-site location, including the impact on the Green Belt, the environment and water discharge into the River Cam, will be considered as part of the separate WWTP DCO process being undertaken by Anglian Water. The outcome of the DCO process will inform the Local Plan Sustainability Appraisal in terms of its in-combination effects with other plans and projects, as noted in the Sustainability Appraisal accompanying the First Proposals."
3. As highlighted in the response to question 2.4(a), SCDC and the City Council are clearly not the Waste Planning Authority and therefore the identification and allocation of a site of a site for a replacement WWTP would not be a matter the for SCDC and the City Council but would be and are a matter for the County Council. The ExA is therefore referred to the County's response to these questions.

e) N/A - given response to (c).

## **Q. no 2.11**

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**Directed to: Applicant, CCC, SCDC**

**Question: Emerging local plan and NECAAP**

*Given the current early stage of the emerging local plan for the area and NECAAP:*

- a) What weight can be afforded to it and its policies; and*
- b) Would it be premature to recommend / grant development consent relating to a site which is not yet formally allocated in a local plan.*

**Answer:**

- a) The LIR addresses the considerable weight that the Councils consider can be afforded to the emerging GCLP and NECAAP in the section at paragraphs 6.107 to 6.110.
- b) Note below:
  - 1. The relationship between the DCO and the emerging GCLP and NECAAP is set out in the LIR at paragraphs 6.102 to 6.106. It is not possible to progress the emerging development plans to Regulation 19 consultation and beyond. A plan that was dependent upon an allocation, which it was not possible to show is deliverable, or alternatively sought to require existing essential infrastructure to leave without evidence of a suitable, viable and deliverable alternative site, would ultimately not be found sound.
  - 2. As set out in the LIR, this is why the policies of the current and emerging local plans do not take that approach. The development plans require a successful DCO in order to progress to examination and adoption. There is an interdependence between the two processes notwithstanding that they properly follow their own separate legislative processes.
  - 3. The ExA's attention is drawn to the guidance on weight to plans and prematurity as an issue in planning decisions under the Town and Country Planning Act 1990 provided in the NPPF at [48 and 50]<sup>1</sup>. If the

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49. ....arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both: a) the development proposed is so substantial, or its cumulative effect would be so

Secretary of State was to grant the DCO it would clearly not be granting consent for the redevelopment of the existing WWTP. To that extent it is difficult in the Councils' view to conclude that that would somehow risk undermining the NECAAP plan-making process which goes much further than these sorts of works. To be clear as well the site is already allocated in the existing plan so again it is not clear how the vacation of it would undermine the emerging plans in the way suggested by the ExA's question.

## **Q. NO:2.12**

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**Directed to: CCC, SCDC**

**Question: Emerging local plan**

*Please provide an update on the progress made in respect of the emerging local plan and NECAAP, including in relation to water supply issues. Please explain the implications of water supply issues in respect of the type(s) of land use that are affected by this issue and whether the amount of development in the emerging local plan might be affected. What are the timescales for resolving this issue?*

**Answer:**

1. In terms of the progress of the NECAAP this is addressed in general terms in the LIRs at paragraph 6.29 to 6.36 of both Councils' LIRs. With regard to the water supply challenge this is also addressed in the LIRs in the section Implications of Water Supply including for Plan timetables at paragraphs 6.64-6.71 of both the Councils' LIRs. In respect of how this has been taken into account in the latest GCLP report Development Strategy Update (January 2023) this is addressed at paragraphs 6.72-6.77 of both LIRs as well. It is also covered at paragraphs 6.84-6.89 of both LIRs again in respect of how water could impact the housing trajectories in both plans.
2. In particular, the Councils in their LIRs acknowledge that it may be appropriate to make some modest amendments to the trajectory in the

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*significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.*

*50. Refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan-making process.*

NECAAP and GCLP once the water supply position is clear (LIR paragraph 6.84). However, the timing Cambridge Water identifies in its updated draft Water Resource Management Plan (September 2023) for additional water supply through a bulk water transfer as 2032 broadly fits with the trajectory in the emerging plans for NEC, and also the removal of the odour constraint if the DCO is approved. Also, the trajectory is not a ceiling on delivery rates and if circumstances allow, build out rates could be higher (LIRs paragraph 6.84).

3. It is understood that the Environment Agency (EA) has a statutory period of 10 weeks to respond to Cambridge Water's revised Water Resource Management Plan that was published in September 2023 and is understood to expire in November. This response is to DEFRA and it is not clear whether it will be made public. DEFRA will make the decision on whether the revised WRMP is approved, and it is hoped it will become clearer before the end of 2023. In any event it is expected that the final WRMP will be published before the conclusion of the DCO examination, and an update can be provided to the ExA when information is available. Whilst this has implications for the timetable for next steps for the GCLP, given the anticipated date for clarity on water supply, it is not expected to have any implications for progressing the NECAAP, which can only take place on conclusion of the DCO process, subject to the DCO being approved.
4. The EA's concerns are focused on water supply as it affects planning applications for larger housing and employment proposals that require an Environmental Statement. The Councils are continuing to engage with the water companies, EA and DEFRA as well as with the Government's new Water Scarcity Group to understand and explore ways in which the water supply situation in the area can be addressed as quickly and effectively as possible both now and well into the future.
5. 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 (see LIRs of both Councils at paragraph 6.89).



## Q. NO:2.13

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**Directed to: SCDC**

### **Question: Emerging local plan and draft NECAAP**

*On page 120 of Applicant Regard to Section 42 Consultation Responses [APP-167], the following comment is attributed to South Cambridgeshire District Council: The AAP committee reports also, however, emphasised that the DCO process is a separate statutory planning process from the GCLP plan making process and that the project itself will be determined under different legislation and by a separate decision maker i.e., ultimately the Secretary of State. The ReWWTP is therefore not a project or proposal within the scope of the joint GCLP or the AAP and it would be inappropriate for it to be such. Both plans are therefore currently being prepared on the basis that the CWWTP will be relocated but this relocation is not a policy requirement of either plan.*

- a) *Please provide a copy of the Committee Reports referred to in [APP-167] and a copy of the record(s) of any decision(s) relating to them (such as Committee minutes).*
- b) *Why would it be 'inappropriate' for the proposed WWTP to be within the scope of the emerging local plan or NECAAP if it is a policy of those documents which gives rise to the need for it to be relocated?*
- c) *Could an application for a replacement WWTP be determined under the TCPA regime?*
- d) *Can proposals which may be consented under the DCO process be reflected in a statutory development plan, for example by identifying or safeguarding land for them, even if an application would not be determined under the TCPA regime?*
- e) *Given that it was within the knowledge of the local authority that the redevelopment of the existing WWTP site would require the provision of a new WWTP, and given the prospect that the site for a new WWTP might be in the Green Belt, why did the emerging local plan not make provision for this, particularly given that Green Belt boundaries can only be altered through a review of a local plan?*
- f) *Have any studies been undertaken on or on behalf of the local authorities (but not including any studies by the Applicant) to identify a site for a replacement WWTP? If yes, please provide a copy. If not, please explain why not.*
- g) *If this application for a DCO is not consented, given that the development of at least part of the NECAAP area would depend on relocation of the WWTP, would you expect the draft NECAAP to be found sound and adopted? Would you progress the NECAAP in its current form?*

- h) Given that the relocation of the WWTP is not a policy requirement of either the emerging Local Plan or the draft NECAAP, could it be concluded that housing that would be delivered on the site of the existing WWTP is not required to meet the housing requirement identified in the emerging Local Plan?*
- i) How much weight should the SoS give to a proposal that is not a requirement of an emerging non-statutory planning document such as an AAP?*
- j) Does the draft NECAAP seek to pre-judge the outcome of this DCO Application? If not, what weight can be afforded at this time to those provisions of the draft NECAAP which depend on the approval of this DCO application?*
- k) If this DCO application was not consented, could redevelopment of other parts of NEC be brought forward in the absence of an adopted NECAAP? If not, approximately how long would it take to prepare and adopt a revised NECAAP?*

**Answer:**

Please note that both the emerging GCLP and the NECAAP are being prepared jointly by SCDC and the City Council and the same comment was made by both Councils in their responses to the section 42 consultation by Anglian Water. The response here is provided for both Councils.

- a) The LIRs for both the SCDC and City Council include the relevant committee reports as requested. As set out at paragraph 6.31 of both Councils' LIRs 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]** 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. The minutes of both meetings are located on the same links.
- b) Note below:
  - 1. The reasons why it would be inappropriate for the proposed WWTP to be within the scope of the emerging local plan or NECAAP is addressed in both the LIRs in the section addressing the relationship between the ReWWTP DCO and the emerging development plans at paragraphs 6.102- 6.106.



2. The key point is that 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.
  3. The relocation of the existing WWTP 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. It is not possible for it to be addressed in the existing or indeed emerging GCLP and NECAAP (see LIRs paragraph 6.102).
  4. It is also important to be clear that both emerging plans are predicated on the relocation of the WWTP and do not require the relocation to take place.
- c) An application for a replacement WWTP if sought under the Town and Country Planning Act 1990 would be a matter for the County Council as the relevant Mineral and Waste local planning authority. The question is therefore best directed to and answered by them.
- d) It would be unusual in the SCDC's and City Council's experience for land that is the subject of a significant proposal to be safeguarded within a development plan unless it was the subject of a specific direction by the Secretary of State or was already the subject of a consent. This is a matter that may well be better addressed by the County Council. Any safeguarded sites included on the MWLP Policies Map adopted by the County Council would be shown on the Policies Maps for Cambridge and South Cambridgeshire as normal.
- e) As explained, the County Council as the Minerals and Waste local planning authority is the relevant authority with the power to allocate a site for a new waste water treatment plant within the Waste & Minerals Development Plan. As addressed in (b) it is not possible in law for the emerging GCLP to contain any policy relating to waste water development, which is a matter solely for the County Council as the Minerals and Waste local planning authority. It would be possible for any changes to the Green Belt boundary, if required and justified to reflect policies and proposals contained in a MWLP and subject to the exceptional circumstances test being met, to be reflected by the County Council in the relevant part of the Minerals and Waste Local Plan process.

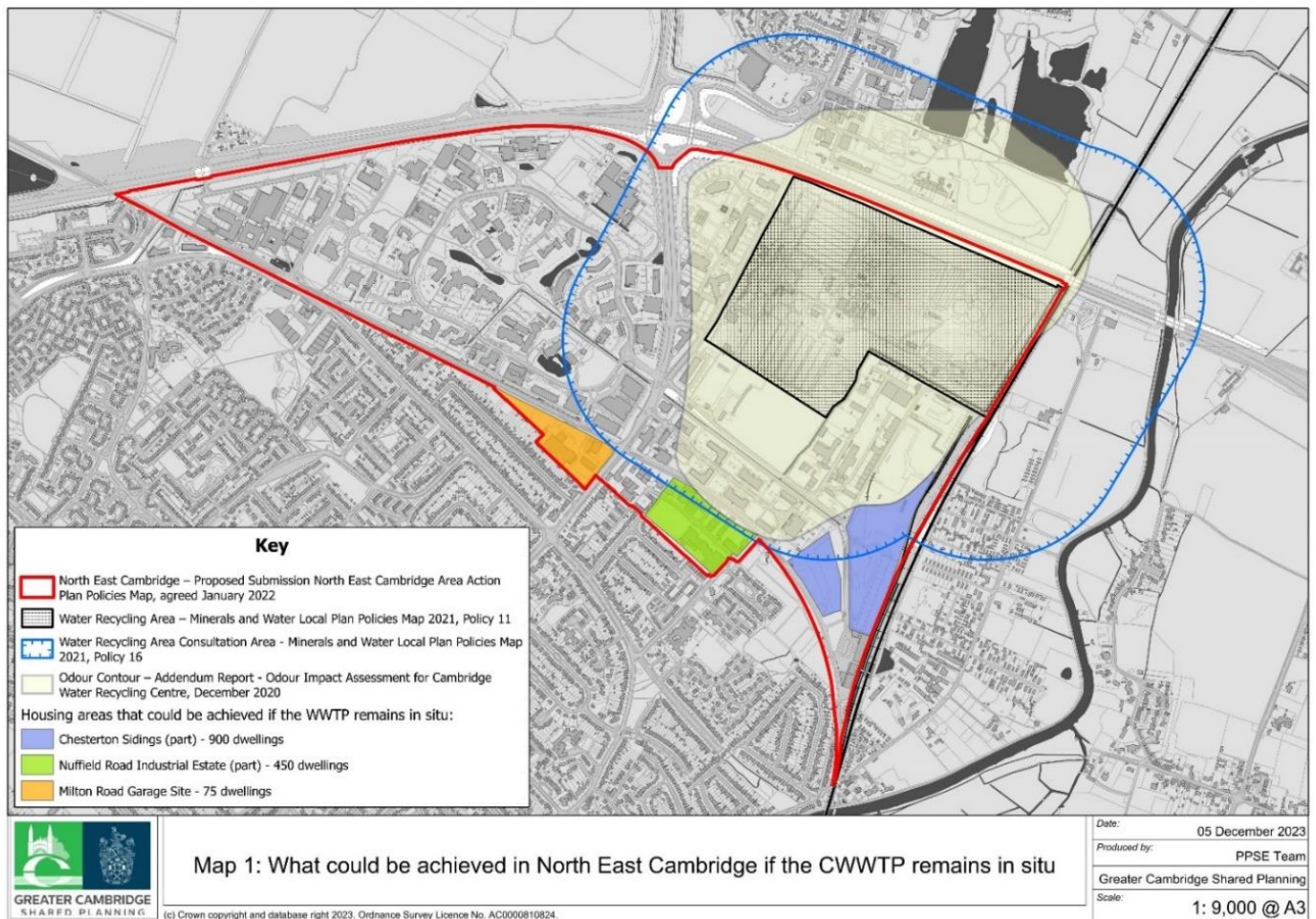
- f) With regard to whether any studies been undertaken to identify a site for a replacement WWTP this is a matter that should be directed to the County Council as the Mineral and Waste local planning authority. Neither the SCDC nor the City Council in their roles as local planning authority would be involved in seeking to identify a site for a new waste water facility.]
- g) Please note below:
1. If the DCO were not consented, the joint NECAAP would not be able to be taken forward in its current form because it is predicated on the relocation of the existing WWTP taking place and assumes development of the site of the existing WWTP and land around it in a way that would not be possible or appropriate with the WWTP remaining in situ due to the need to protect the essential infrastructure and the consequences of the odour constraint that would continue to impact the surrounding area.
  2. The position in short could do no more than as it currently addressed in the existing 2018 Local Plans with the matter no further forward. The Councils would need to consider whether it was appropriate to prepare a revised AAP or to provide a new policy approach to the area through the GCLP given that the potential for development would be severely constrained as is currently the case and has been for over 20 years. Given the very limited land uses that could be accommodated with the odour constraint remaining, it may well continue to sit underdeveloped as an underutilised asset, while other strategic scale sites for housing and employment uses in less sustainable locations had to be allocated.
- h) It would not be correct to conclude that housing proposed in the NECAAP and GCLP at the NEC site is not required to meet the housing requirement identified in the emerging GCLP. As set out in the LIRs of both the SCDC and City Council at paragraph 6.51, the NEC site is included as a proposed policy for 8,350 homes of which 3,900 are identified to come forward by 2041 alongside 15,000 jobs in a mix of sectors but including those with a particular need to locate in Cambridge. In the LIRs within the section on Strategic Options and Alternatives to the inclusion of North East Cambridge starting at paragraph 6.52, the substantial planning and sustainability benefits of the location compared with any other option for strategic scale growth available in the Greater Cambridge area is made clear. As explained, the HIF provides a once in a generation opportunity to enable the relocation of the existing WWTP and for the authorities to take advantage of the locational benefits of

the NEC site. These benefits can only take place if the relocation of the existing WWTP takes place.

- i) For clarification, the Proposed Submission NECAAP is being prepared as a statutory development plan document, and it is not a non-statutory document as suggested in the question. The question of weight to be given to the NECAAP is addressed in the LIR at paragraphs 6.107 to 6.109 and in the Council's opinion is considerable. See also responses to (b) and (e) above in relation to why SCDC and the City Council cannot include a policy relating to a new site for the CWWTP.
- j) Please note below:
1. The emerging NECAAP is predicated on the relocation of the existing WWTP taking place and it does not pre-judge the outcome of the DCO examination. The matter of weight to be given to the Proposed Submission NECAAP is addressed in the Councils' LIRs at paragraphs 6.107 to 6.109. 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.
  2. 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.
- k) Please note below:
1. The significance of the granting of the DCO to realising the opportunities for substantial regeneration of this highly sustainable location cannot be overstated. As set out in the LIRs at the section What Could be Achieved in NEC if the CWWTP remains in situ (LIRs paragraphs 6.97 to 6.100), only very limited forms of development

could be considered appropriate given the extent of the constraint that odour from the CWWTP creates in the area around it.

- Map 1 provided after paragraph 6.35 of the of the LIR, and repeated here for convenience shows the safeguarded CWWTP, the 400m buffer area around it under the Minerals and Water Local Plan, the odour contours in the Councils' AAP evidence and identifies the t three small areas identified in the AAP for residential use, amounting to only 1,425 homes out of the total AAP quantum of 8,350 homes. See response to part (g) in respect to what would be the next steps if the DCO was not approved. Please note this map is also appended to this document as Appendix 3.





## **Q. NO:2.14**

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**Directed to: CCC**

### **Question: Emerging local plan and draft NECAAP**

*CCC's RR [RR-002] states that: 28. The City Council recognises that one of the issues the ExA may need to explore is that of reasonable alternatives to the relocation of the existing CWWTP and what the City Council's position is in light of the above and the clear contribution the DCO project makes towards achieving the objectives currently contained within the emerging joint GCLP. and that 29. The evidence base supporting the emerging GCLP is clear. This concludes, of all the options considered, the NEC site (which includes the existing CWWTP site as noted above), is the most sustainable location for development in the area.*

- a) Please provide a copy of the evidence base / Sustainability Appraisal that concludes that, of all of the options considered, the NEC site is the most sustainable location;*
- b) Did the assessment of sustainability take account of the release of Green Belt land to facilitate development of the NEC site when it assessed the relative sustainability of growth options? If not, clarify the reason for this;*
- c) Has an option been considered where the existing WWTP remains in situ and other parts of NEC are redeveloped?  
Has this possibility been independently assessed by / on behalf of the Council and consulted on;*
- d) Which alternatives to NEC were considered and discounted;*
- e) RR [RR-200] mentions potential for housing development at Impington and Histon and at Cambridge City Airport instead of using the existing WWTP site – please clarify whether these sites have been considered for future housing development?*
- f) Has an option of denser development at other proposed allocations / on a reduced-size NEC been explored as an alternative to the currently proposed extent of NEC?*

### **Answer:**

This question is directed to Cambridge City Council alone however the questions relate to the joint NECAAP and emerging GCLP and therefore it is appropriate that SCDC answers the question with the City Council. The quote in the question is also included in SCDC's RR at paragraph 22 in any event.

- a) Please note below:

1. As set out in both Councils' the LIRs in the section on Strategic Options and Alternatives to the inclusion of North East Cambridge (paragraphs 6.52 – 6.63), the NEC site is the last remaining strategic scale brownfield site within the urban area of Cambridge (paragraph 6.54). Evidence has been prepared at several stages of plan making to date, but the following three evidence documents are particularly relevant.
2. The Climate Change evidence was clear that transport emissions are the deciding factor in the carbon differences between spatial options (LIR paragraph 6.58 and evidence in Appendix 1, GCSP-23 - Strategic spatial options appraisal: implications for carbon emissions, by Bioregional, 2020, page 24, second paragraph).
3. The Transport Evidence demonstrated that North East Cambridge is the best performing strategic scale location for provision of new development within Greater Cambridge (the area covered by Cambridge and South Cambridgeshire) (LIR paragraph 6.61 and evidence in Appendix 1, GCSP-26 - Transport Evidence Report - Preferred Option Update, by Cambridgeshire County Council, 2021, section 14.3 and Table 13).
4. The Sustainability Appraisal 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 (paragraph 6.61 and evidence in Appendix 1, GCSP-27, Sustainability Appraisal Non-Technical Summary 2021 – Table 12: Summary of SA effects for preferred policy approaches).
5. 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. 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.

- b) The emerging GCLP is predicated on the existing WWTP being relocated. As set out above in answer to Question 2.4(a), the waste planning authority is the County Council and the allocation of a new WWTP is outside the remit of the City and District councils. It is not a proposal of the adopted or emerging Local Plans. It should be noted that the proposed new WWTP is however taken into account as part of the cumulative impact assessment within the draft Sustainability Appraisal of the emerging GCLP (see LIR Appendix 1, GCSP-27]
- c) Please note below:
1. With regard to the alternative scenario and options considered for the NECAAP, the Chronology supporting the NECAAP (see LIR Appendix 1, GCSP-18) at page 13 sets out, that the business case of City Council and Anglian Water (as site owners) which informed the Housing Infrastructure Fund (HIF) bid, was supported by the Combined Authority. This assessed the option of consolidating the existing Waste Water Treatment Plant (WWTP) for retention on site, and: *“assessed that if consolidation into the north eastern portion of the existing site could have been achieved, at best, this would release circa 40% of the existing operational area. However, the area released would be constrained by operational needs and odour safeguarding, resulting in only 16 hectares of potentially developable land. Due to the odour constraints, development of the released land would only be suitable for industrial or commercial use and the overall quantum enabled would be minimal. Further, the re-positioning could impact on the acceptability of the mixed-use scheme being promoted on the land adjacent to the Cambridge North Station. The assessment concluded that, without potential for housing, the redevelopment would not attract HIF type funding and would render the consolidation option unviable.”*
  2. The Councils accepted this position, recognising the significance of the HIF in addressing the viability constraint identified in previous studies over many years which effectively blocked any progress. The GCLP First Proposals sets out what alternatives the Councils considered. The document (see both LIRs at Appendix 1, GCSP-5) at page 58 states *“2. Reduced developable area by retaining a consolidated Waste Water*

*Treatment Works on site as either an indoors or outdoors facility - Not considered a reasonable alternative as evidence shows that this is not deliverable or viable and is therefore not considered to be a reasonable alternative”.*

3. The GCLP First Proposals were subject to consultation in 2021 and representations have been published on the Councils’ consultation website. The representations are summarised in the Consultation Statement and responses relating to NEC and the issue of relocation of the CWWTP are included in the extract at Appendix 2.

d) Please note below:

1. In identifying the preferred option for the GCLP, the Councils considered all reasonable available options, including the full range of locations from urban area to villages, and including the principle of Green Belt releases on the edge of Cambridge, as set out in the LIRs at paragraphs 6.52 to 6.63.
2. NEC was selected as a key part of the development strategy in the First Proposals and then reconfirmed in the Development Strategy Update (see LIR paragraphs 6.72 to 6.77). The GCLP approach is to select the best available package of sites that results in a blended development strategy in order to meet the high level of need for housing in the area, well above the Government’s standard method (see LIRs paragraph 6.72). A wide range of locations and sites were considered as part of that process and the sites that had the best fit with the Plan’s objectives were identified in the First Proposals. There were no other strategic scale sites put forward within the urban area of Cambridge.
3. As set out in the LIRs at paragraph 6.62, the Councils advised that their position in the First Proposals was that they do not consider that housing needs alone would 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. It is recognised that the site proposed in the DCO at Honey Hill lies in the Green Belt and that this would be for a different purpose than could be proposed through the GCLP. As explained in 2.13 (b) and (e) it is not possible for the GCLP to include site allocations or policies relating to a new waste water facility.



4. Paragraph 6.80 of the LIRs addresses the matter of where any alternative strategic scale development may need to be allocated if the DCO is not approved and the relocation of the CWWTP were not to take place.

e) Please note below:

1. RR-200 (which is the relevant representation of Kwok Wai Cheung who is a resident of South Cambridgeshire) seems to suggest that two other short-listed sites for relocating the waste water treatment plant at Impington and Histon should be considered for housing, and that the existing Cambridge City Airport could provide for needs in the new plan, instead of the NEC site.
2. The sites at Impington and Histon that were considered by Anglian Water as alternative sites for relocation of the CWWTP. Both lie within the Green Belt and are detached from the urban area of Cambridge and from either village. They also lie north of the A14 which forms a clear boundary to the urban area of Cambridge. As set out in answer to point (d) above, the Councils do not consider that housing needs alone provide the 'exceptional circumstances' required in national policy to justify removing land from the Green Belt, even if those sites were contiguous with the edge of the urban area.
3. As to Cambridge Airport, the site forms part of the Cambridge East proposed urban extension which was originally proposed in the Cambridgeshire and Peterborough Structure Plan 2003, alongside the NEC site. The Airport part of the site has not been able to come forward due to difficulties in relocating the Airport and it is identified as safeguarded land in the 2018 Local Plans. However, the GCLP First Proposals already include the Airport site as part of the development strategy for Greater Cambridge for a total of 7,000 homes and 9,000 jobs. The proposed allocation is now possible because there is an alternative site for relocation of the Airport to Cranfield that has recently been granted planning permission. With the lead in time for the relocation of the Airfield to take place and housing to begin on the Airport site, the GCLP assume delivery of 2,900 homes in the new plan period to 2041. The Councils must make realistic forecasts of housing delivery in order for the plan to be found sound. Note that it would not be possible for the site for a new WWTP to be safeguarded within the GCLP for the reasons set out in question 2.13 (b) and (e).

- f) The Councils have sought to make best use of all sites identified within the emerging GCLP, at densities that secure sustainable development but that also respect the character of Cambridge. Even if higher densities were possible, this would most likely be on strategic scale sites and the issue of realistic delivery rates means they are unlikely to be able to deliver substantially more housing within the plan period. As considered at question 2.13(k) there is very limited land that could come forward at NEC for housing if the CWWTP remains in situ such that higher densities would have little additional impact on meeting housing needs.

## **Q. NO. 2.15**

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**Directed to: Applicant, CCC, SCDC**

**Question: Housing benefits – weight**

*How much weight should the ExA afford to housing delivery as a benefit having regard to: the unallocated status of the existing WWTP site; demolition / remediation associated with the existing WWTP site not secured through the dDCO; housing delivery not secured through the dDCO; no specific policies within the current development plans for CCC and SCDC relating to the relocation of the existing WWTP to the site proposed; and any draft policies in the emerging local plan and the NECAAP not having yet been tested or formally examined?*

**Answer:**

1. The National Planning Policy Framework (NPPF) (September 2023), at paragraph 60, confirms the government's objective to significantly boost the supply of homes to address housing affordability and choice, and to support economic growth – both critical issues for Cambridge. Government's Cambridge 2040 initiative also focuses on the significance of the Cambridge area to the national interest and the July Statement from the Secretary of State includes specific reference to the significance of the North East Cambridge proposed new City quarter (see both LIRs paragraphs 6.113 to 6.115).
2. Although the grant of the DCO does not itself directly secure the provision of housing on the existing WWTP site, drawing on the HIF funding to implement the DCO will require the landowners ie Anglian Water and the City Council to bring forward an application for a planning permission proposing the

redevelopment of the existing WWTP site, that includes the provision of c.5,500 new homes. The landowners have actively engaged in the development of the draft NECAAP, including preparation of evidence base studies that confirm the site is capable of being developed for residential use – such as the Surface Water Drainage Core Principles (November 2021), Integrated Water Management Study (August 2021), Area Flood Risk Assessment (June 2020), Ecology Study (June 2020), Noise Model and Mitigation Assessment (June 2020), and Phase 1 Geo-Environmental Desk Study (November 2021).

3. More recently, the master-developer appointed by Anglian Water and the City Council, has commenced pre-application discussions with the Shared Planning Service, including entering into a Planning Performance Agreement, to advance the proposal for the site. Given the above, the Councils consider that considerable weight should be given to the significant contribution the existing WWTP site could make towards meeting future strategic housing requirements for the Greater Cambridge area.

## **Q. NO. 2.16**

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**Directed to: Applicant, CCC, SCDC**

**Question: Planning history**

*Is there any planning history of relevance to the determination of the DCO application?*

**Answer:**

The Council can confirm there is no planning history of relevance to the determination of the DCO application. The Councils would however defer to the County Council as the Minerals and Waste Local Planning Authority.

## Q. NO:2.19

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**Directed to: Applicant, CCC SCDC**

**Question:**

Need – NPPW

*Para 7 of NPPW states that waste planning authorities should only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where proposals are not consistent with an up-to-date Local Plan. In such cases, waste planning authorities should consider the extent to which the capacity of existing operational facilities would satisfy any identified need.*

- a) *Do you consider that a need should be demonstrated for the proposed WWTP; and*
- b) *Do you consider that the extent to which the capacity of the existing operational facilities would satisfy the need should be taken into account?*

**Answer:**

The Councils would defer to the County Council as the Minerals and Waste Local Planning Authority.

## Q. NO:2.25

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**Directed to: Applicant, CCC, CCoC, SCDC**

**Question: Benefits**

*It is proposed that the Waterbeach WRC would be replaced by a new pumping station, which would direct untreated effluent to the proposed WWTP and would support the development of Waterbeach New Town. However, given that the new pumping station at the Waterbeach site is outside of the control of this DCO application (as it is proposed to be provided by the developer of Waterbeach New Town and is subject to a separate planning application which has not yet been submitted), how can the ExA have confidence that this would be granted planning permission and be delivered, if the proposed WWTP were consented? Can an update be provided on the timescale for submission and likely determination of the pumping station? To this end, what extent can the benefits of providing connection from Waterbeach to the proposed WWTP be offered weight in the planning balance at this time?*

**Answer:**

1. The Applicant would be best placed to advise the ExA on the time scales but the District Council can confirm it has been engaged in pre-application discussions in respect of Waterbeach WRC over the course of the last year. Details including siting and access have been considered as part of the pre-application discussions. The District Council is now awaiting to the application's submission.
2. While the District Council acknowledges that the connection from Waterbeach to the new proposed WWTP would be a benefit of the proposal, it is also possible for this same connection to be made to the existing WWTP. As such, the benefit of connecting to the new plant is not in the Councils view of itself a significant benefit.

**Q. NO:2.27**

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**Directed to: Applicant, CCC, SCDC, CCoC, IPs**

**Question: Site selection**

*According to Environmental Statement Chapter 3 - Appendix 3.1 Initial Options Appraisal [APP-074], the Government announced in March 2019 that a Housing Infrastructure Fund (HIF) funding would be granted for the relocation of the existing WWTP. At para 2.2.22 of ES Chapter 3 [AS-018], and in respect of Stage 3 of the site selection process it is stated that - consideration was also given to the relative affordability of the sites, an important factor given the public funding of the CWWTPRP by the Government's HIF.*

*The Stage 1 Initial Site Selection Report [APP-075] is dated 1 July 2020 and the Stage 3 Fine Screening Report [APP-077] is dated 1 July 2020. Para S.14. of [APP-077] notes that some of the options explored in 2020 were unaffordable based on the amount of HIF funding that had been awarded. At para 2.2.24 of ES Chapter 3 [AS-018] it is stated that sites outside of the Green Belt were not deliverable under the HIF funding and that this was primarily a function of the significant additional tunnelling necessary to transfer waste water to sites outside of the Green Belt.*

- a) *When was the bid for HIF funding submitted?*
- b) *Prior to the July 2020 site selection exercises were undertaken, were options for the relocation of the WWTP explored and costed to support the HIF bid?*

- c) *If yes, please provide details of the sites that were considered and those which were discounted. Was the range of sites the same or more limited than in the July 2020 exercise? If it was more limited please explain why, and why the area of search was expanded for the July 2020 exercise that has been submitted as part of this DCO application.*
- d) *Was the scope of the site search exercise for the HIF bid agreed with any local authority?*
- e) *Which site or sites in [APP-075] could be delivered within the £227m funding envelope? Please provide evidence to support your response.*
- f) *If it was already known that some sites were not deliverable within the HIF funding envelope, why were they included in subsequent analyses? Does this affect the robustness of any consultation that was undertaken after the HIF funding announcement?*
- g) *Was the £227m bid based on the highest-cost option? If not, which options were discounted for the purposes of the bid?*
- h) *Was Homes England made aware that the cost of tunnelling was a variable that could affect the affordability of a relocation scheme?*
- i) *Were any planning risks in respect of the relocation site identified in the bid? If yes, what were they and did they include the Green Belt designation? Was it explained that non-Green Belt options could be delivered at a higher cost?*
- j) *Was it made clear in the bid that no site had been allocated or proposed to be allocated in a development plan document for a replacement WWTP? Was this considered to be a project risk?*
- k) *Please provide a copy of the HIF bid submission and a copy of Homes England's assessment and decision, including any conditions / obligations attached to it.*

**Answer:**

- a to c The matters raised in these questions are for the City Council and Anglian Water as Applicant and landowners promoting the redevelopment of the site. They are not matters for the local planning authorities.
- d) The scope of the site search exercise for the HIF bid was not agreed with either SCDC or the City Councils.
- e to k The matters raised in these questions are also for the City Council and Applicant as landowners promoting the redevelopment of the site. They are not matters for the local planning authorities.



## Q. NO:2.30

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**Directed to: Applicant, CCC, SCDC, Homes England**

**Question:**

Housing delivery – certainty of housing delivery on existing WWTP site

*What evidence is there to demonstrate that the existing WWTP site is likely to be suitable for development – for example, if the land is shown to have been contaminated over the years by the existing WWTP, has there been a feasibility assessment and financial estimate for site remediation and an assessment made as to whether this would be prohibitively expensive for a developer?*

**Answer:**

1. The Applicant will need to respond to the question of whether they have undertaken a site-specific feasibility assessment and financial estimate of any required remediation on the existing WWTP site. With respect to the question of what evidence there is currently available to demonstrate the existing WWTP site is suitable for housing development, a robust and comprehensive evidence base assessment of the NEC area, including the existing WWTP site has been prepared to inform the draft NECAAP. These assessments include technical studies, undertaken by suitably qualified professionals, covering key constraints. These studies have been published alongside the draft NECAAP and include: the Surface Water Drainage Core Principles (November 2021); Integrated Water Management Study (August 2021); Area Flood Risk Assessment (June 2020); Ecology Study (June 2020); Noise Model and Mitigation Assessment (June 2020); and Phase 1 Geo-Environmental Desk Study (November 2021).
2. With respect to the Phase 1 Geo-Environmental Desk Study, this assessed each of the land parcels within NEC and concluded: *“the majority of the challenges posed in terms of contamination at the North East Cambridge site are typical of brownfield redevelopment in England. With the possible exception of the Nuffield Road Industrial Estate are, there are unlikely to be any issues which would challenge the viability of such a large scheme. The majority of remedial measures, should they deemed to be necessary to ensure safe redevelopment, will probably be aimed at human health and all relatively straightforward.”*
3. None of the studies listed above found that the existing WWTP site is not capable, with appropriate mitigation or remediation measures, of providing

for residential use. However, more detailed surveys and assessments will be required to support any future planning application to categorically demonstrate this and would be expected of Anglian and the City Council as applicants.

## **Q. NO:2.31**

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**Directed to: Applicant, CCC, SCDC**

**Question: Emerging local plan and draft NECAAP**

*In the RR of CCC [RR-002] it is stated that -*

*30. However, the City Council recognises that it would have to review the situation in the event that the release of the CWWTP site does not occur for any reason, for example if the SofS decides to refuse to grant the DCO or if there are delays to the release of the existing CWWTP site or indeed if the applicant decides not to implement the DCO. and that 31. The City Council together with South Cambridgeshire District Council would have to try to identify and allocate other land within Greater Cambridge as part of the emerging GCLP to meet the area's strategic requirements for housing and employment.*

- a) Given the award of HIF funding to support housing delivery, are there any conditions attached to that funding or obligations which require the Applicant to implement the DCO? If there are obligations on the Applicant, please provide details of these and the timing of those obligations.*
- b) In the development agreement or any other agreement, are there obligations on the Applicant to make the existing WWTP site available by a certain date? If yes, what is the date? Please provide a copy of this obligation or the reference to it if in a document that you have already provided.*
- c) In the development agreement or any other agreement, are there obligations on the NEC master developer or any other party to commence or to complete the redevelopment of the existing WWTP site by a certain date? If yes, what is / are the date(s)? Please provide a copy of this / these obligation(s) or the reference to it / them if in a document that you have already provided.*
- d) Please provide details of the number of homes that need to be delivered at NEC within the plan period of the emerging local plan.*
- e) Please provide the housing trajectory for the emerging local plan period which disaggregates the number of homes at NEC per year and the number of those homes which would be on the existing WWTP site.*



- f) *If the DCO is not consented, how many homes could be brought forward at NEC? Please provide a marked-up copy of the draft policies map / site allocation to indicate which parts could still be brought forward.*

**Answer:**

a to c) The matters raised in these points are for the City Council and Applicant as landowners as promoters of the redevelopment of the site to answer. This is not a matter for the local planning authorities.

- d) The number of homes that need to be delivered at NEC within the plan period of the emerging local plan has been identified through the emerging GCLP. It identifies a housing trajectory of 3,900 homes to be delivered at NEC in the plan period to 2041 (see both SCDC and City Council’s LIRs Appendix 1, GCSP-5, GCLP First Proposals, Policy S/DS: Development Strategy, table on page 32).
- e) The emerging GCLP housing trajectory does not break down the NEC site into land parcels therefore it is not possible to provide the ExA with the number of homes to be delivered specifically on the existing WWTP site. The draft NECAAP however does set out the broad distribution and phasing of housing anticipated in the plan in Figure 45 page 271 (see Councils’ LIRs Appendix 1, GCSP-7, Proposed Submission North East Cambridge Area Action Plan). The emerging NECAAP considers the WWTP site together with the surrounding land owned by Cambridge City Council that is being brought forward through a single development partner and on that basis assesses the following delivery:

2020/25	2025/30	2030/2035	2035/41	Plan period	2041+	Total
-	-	400	1,500	1,900	3,600	5,500

- f) Please note below:
1. Section 6, paragraphs 6.34 & 6.99, of the Councils LIRs, sets out the numbers of housing units that could be achieved if the existing WWTP remains in situ. In summary, because of the extent of the odour constraints, only 325 of the 8,350 dwellings otherwise proposed would likely be capable of being supported (i.e. granted planning permission). See Map 1 at Appendix 3 to this document, which is also provided in the response to question 2.13 above and as Map 1 after paragraph 6.35 of both Councils’ LIRs.

2. However, it is also relevant to consider the fact that in the absence of the regeneration of the wider NEC area, which is part of the NECAAP policy proposal, and the provision of a higher quality environment as a consequence, this necessarily renders it far less clear whether the landowners who could in theory still bring forward residential development would in fact wish to do so. This is because it is already currently an option available to them, but these same landowners have to date chosen not to pursue this.

## Q. NO. 2.32

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**Directed to: Applicant, CCC, CCoC**

**Question: Housing development around the existing WWTP**

Statement of Requirement [APP-201] para 10 states that –

*The WWTP cannot remain at the existing site and still release a significant area of brownfield land for residential development even if it is reconfigured with a reduced footprint. If the WWTP was reduced in size, redevelopment of the remaining area would be restricted, particularly for residential development because of the necessary safeguarding imposed around it. AWS' experience of residential development close to waste water treatment plants would preclude it from allowing such a scenario to happen.*

*Para 11 goes on to state that:*

*A safeguarding area of 400 metres exists around all waste water treatment plants in Cambridgeshire and Peterborough. Where new development is proposed within the safeguarding areas involving buildings which would normally be occupied, the associated planning application must be accompanied by an odour assessment report.*

*Similarly, ES Chapter 3 [AS-018] states - As discussed in the Planning Statement, option (b) (co-location of new development alongside the existing treatment works) would be heavily constrained by planning policy, including the provisions of the Cambridgeshire and Peterborough Minerals and Waste Local Plan, adopted in July 2021. Policy 16 of the local plan establishes a presumption against development of buildings which would be regularly occupied by people within a consultation area of 400m from the edge of the site of a Water Recycling Area (para 1.2.4). This policy would restrict development at NEC to employment land-use with largely general industrial and office uses on the fringes of the area. Housing development would not*

*be possible on a core 35ha of land forming the gateway between Cambridge North station and the Cambridge Science Park (para 1.2.5). Consideration was additionally given to consolidating the existing treatment assets to occupy a smaller area of the existing site. However, this approach would not fully remove the presumption against development on large parts of the remainder of the site described above.*

*Furthermore, the business case for the HIF funding award could only be sustained on the relocation of the whole WWTP, to enable regeneration of most of the site for housing. Funding was not available for a partial solution and without it, consolidation would be uneconomic. There was no partial solution which could sustain HIF support (para 1.2.6).*

- a) Please provide a copy of the layout for NEC that the above comments from the Statement of Requirement and ES Chapter 3 have been based on.*
- b) What is the status of that layout – does it benefit from planning permission?*
- c) Please explain how many units would be lost from that layout if the WWTP remains in situ and if a 400m buffer zone is observed.*
- d) Please explain how many units would be lost from that layout if the footprint of the WWTP were to be reduced / consolidated (which [APP-201] does not specifically state would be unfeasible) and if a 400m buffer zone is observed.*
- e) Have measures to reduce the 400m buffer zone / safeguarding area been explored in this scenario? If so, please provide details and how many additional homes could be achieved. If not, please explain why not.*
- f) Does the draft NECAAP provide an indicative distribution of land uses across the AAP area? If so, is there scope to alter / reconfigure the indicative distribution of land uses so that employment / business uses are closer to a retained or a reconfigured WWTP? If not, why not?*
- g) Please comment on [RR-077] which suggests that Deephams and Eastbourne waste water treatment works demonstrate scope for housing being much closer than 400m with appropriate design.*
- h) In respect of there being no partial solution which could sustain HIF support, please provide a copy of any bid / submission that was made in relation to funding for a partial solution and Homes England's response to this.*

**Answer:**

a to b) The requests in these points are for the Applicant and not a matter for the local planning authorities.

- c) Whilst the question about the number of housing units that would be lost from the layout if the WWTP remains in situ and if a 400m buffer zone is directed to the Applicant in respect of their ES and layout, the ExA's attention is directed

to the Councils' response provided to question 2.31 (f), as it applies to the NECAAP and the homes proposed in the plan. The effect of the existing WWTP remaining in situ is, in short, that 8,025 homes would be lost from the AAP and the 400m buffer zone is observed.

d) Please see below:

1. Whilst the question is directed to the Applicant it is fair to say that the Councils do not consider the option comprising the reduction in the size of the WWTP somehow or its consolidation (if a 400m buffer zone being observed) is in fact a reasonable option. This will not achieve the long-held ambition the Councils have for the area; will not maximise the investment already made in sustainable transport; will not contribute significant housing towards meeting Greater Cambridge's future housing need; is unlikely to support higher quality development; and will not deliver the environmental enhancements that would benefit surrounding businesses and neighbouring residential communities.
2. The Councils have not carried out any recent work on what might be achieved if the CWWTP were consolidated on site (noting this was a high level options put forward in the 2014 Issues & Options consultation report for the Cambridge Northern Fringe East), but given the extent of the buffer zone and requirements for servicing, if circumstances changed and consolidation proved to be feasible and viable, it is anticipated that this would not significantly increase the number of homes that could be achieved if the existing WWTP remained in situ and unaltered. This is primarily because the land likely to be removed from any odour constraint is already in some form of commercial use and, without the catalyst of the removal of the existing WWTP to facilitate wider regeneration, would likely continue to be promoted by the landowner for intensification of commercial use. Importantly, as no houses could be delivered on the Applicant's land, even if the existing WWTP was consolidated on site, the majority of the homes promoted through the NECAAP would still be lost, as the Applicant's site and adjoining land being promoted jointly with the City Council as landowner, is to provide 5,600 of the 8,350 total homes planned for through the NECAAP.

e) The answer to this matter is for the Applicant.

f) As set out in answer to part (d) it is not considered that there is potential to reconfigure land uses in any meaningful way which could achieve any significant levels of housing or sensitive employment uses. The draft NECAAP

does provide an indication of the distribution of land uses across the area (see LIRs Appendix 1, GCSP-7, Figure 11: Proposed land uses within the Area Action Plan boundary, page 36). This distribution has been informed through discussions with the strategic landowners. Cambridge Science Park and St John's Innovation Park have strongly resisted the promotion of residential use within their sites. That view is likely to be reinforced if the existing WWTP were to remain in situ, even if consolidated onto a smaller part of the existing site. As stated previously, outside of the extent of the odour constraints, there are limited sites within the NECAAP boundary with landowners that are willing to promote residential use. However, in the absence of more comprehensive area-wide regeneration, it remains uncertain if this would remain the case.

- g) This is a matter for the Applicant to answer.
- h) This is a matter for the Applicant to address.

### **Q. no. 2.33**

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**Directed to: Applicant, CCC, SCDC**

**Question: Housing delivery at NEC**

ES Chapter 2 [APP-034] notes at para 6.1.1 that –

*Once construction and commissioning of the proposed WWTP has been largely completed, there will be no requirement for any of the above ground plant or equipment at the existing Cambridge WWTP to remain in operation, other than that related to the new transfer tunnel shafts that comprises a vent stack, odour control and dosing unit.*

*Does the remaining plant affect the amount of housing envisaged in the emerging Local Plan and associated NECAAP?*

**Answer:**

The Councils' understanding is the remaining plan would not affect the amount of housing envisaged. In determining the development capacity of the existing WWTP site within the NECAAP, consideration was given to the plant that would need to remain, including access and servicing requirements, alongside other constraints, such as the undergrounding of the overhead power lines and the retention of identified biodiversity features.

## Q.no. 2.34

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**Directed to: Applicant**

**Question: Housing delivery**

*ES Chapter 3 [AS-018] notes at para 1.2.3 that In respect of option (a) ("do nothing"), such an approach would result in the failure to fully deliver on required housing numbers in Greater Cambridgeshire and / or necessitate the delivery of housing at less sustainable locations.*

*a) Please indicate, with reference to the emerging local plan housing trajectory, the extent of the failure to fully deliver on required housing numbers in Greater Cambridgeshire.*

*b) Which less sustainable locations would need to be developed, and how many homes would need to be delivered at such locations during the emerging local plan period?*

**Answer:**

- a) Whilst this is not directed to the Councils, the response to question 2.32(c) sets out the substantial loss of housing to meet identified needs during the plan period and beyond.
- b) The alternative locations considered as part of the plan preparation and the relative sustainability of those sites is referred to in answer to question 2.14 d. above and in the Councils LIRs paragraphs 6.52 – 6.63. Alternative sites would need to be identified to fully meet the 3,900 homes that would be lost from the NEC area for the plan period of the emerging GCLP to 2041 and a further 4,450 homes for the period beyond 2041 in respect of future local plan reviews.

## Q. no. 2.35

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**Directed to: Applicant, CCC, SCDC**

**Question: Proposed Development**

*Were the DCO to be consented, could there be a situation where:*

- a) *the Proposed Development is implemented and the existing WWTP site is not developed;*



- b) the Proposed Development is only partially implemented, such as the Waterbeach pipeline element connecting to the existing WWTP which is due to be implemented first (according to Figure 1.1 of ES Chapter 2 [APP-034]) and is not reliant on HIF funding;*
- c) If your answer to the above two questions is no, please provide reasons for this.*

**Answer:**

- a. From the local authorities' perspective, it is almost inconceivable that, if the new facility was constructed, that the site of the existing WWTP would not be redeveloped, as it is assumed that this is a requirement of the HIF funding and also taking account of the strength of the market in Greater Cambridge.
- b. The Councils are not privy to the full details of the contractual circumstances surrounding the HIF funding however given that the Councils would clearly want to avoid the sort of partial implementation identified in the question this could be addressed through requirements to be imposed upon the DCO
- c. Given the Councils have, for the past three decades, sought to bring the area forward for regeneration and redevelopment, and have prepared the draft NECAAP at risk, to ensure a plan-led approach, it would again be inconceivable that they would not grant planning permission for an NECAAP compliant development.

### 3. AGRICULTURAL LAND AND SOILS

No questions directed to CCC or SCDC

### 4. AIR QUALITY

#### Q. NO. 4.3

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**Directed to: Applicant, CCC, SCDC**

**Question: Policy**

*Do you consider the air quality-related policies of the November 2021 'Proposed Submission North East Cambridge Area Action Plan Regulation 19' or of the Regulation 18 'Greater Cambridge Local Plan' to be Important and Relevant to the consideration of the DCO application?*

**Answer:**

The Councils do not consider these draft policies to be important and relevant considerations to the consideration of the DCO application. This is in large part because they are irrelevant. The draft NECAAP policies on air quality are specifically concerned with future redevelopment of the NEC area and the provision of residential use (a sensitive receptor) in a higher density mixed use neighbourhood, ensuring acceptable air quality standards are achieved through submission of development specific air quality assessments. The consideration of sensitive receptors will have regard to retained waste-water infrastructure as well as proposed new infrastructure in the form of energy centres and mobility hubs and to traffic impacts. Such policies would therefore be of limited importance and relevance to the determination of the DCO application.

#### Q. NO. 4.6

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**Directed to: CCC, SCDC**

**Question: Air Quality Statutory Limits**

*Do you consider that the Proposed Development would lead to non-compliance with any statutory limits whether during the construction, operational or decommissioning phases?*

**Answer:**

**CCC** - Only the decommissioning work would relate to the of the proposed development fall within the remit of the City Council. Due to the temporary and limited nature of those works, we do not consider that there is a risk to the National Air Quality Objectives (the statutory limits) as decommissioning progresses. The construction and operation of the proposed new facility will not have any adverse impacts within the administrative boundary of Cambridge City Council.

## **Q. NO. 4.8**

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**Directed to: CCC, SCDC**

**Question: Policy compliance and mitigation**

*SCDC's RR [RR-004] says that, in general terms, it is satisfied with the scope, methodology and the initial conclusions derived from the Air Quality chapter of the ES. CCC's RR [RR-002] says that it is satisfied with the scope, methodology and results / conclusions of ES Chapter 7 when considering potential impacts within the City boundary. It also notes that CCC intends to comment upon the Decommissioning Management Plan (DMP) prior to works commencing. CCC recommends that airborne dust and emission control, management and monitoring during decommissioning should be captured by the DMP document to help minimise impacts of that phase of work.*

- a) *Does SCDC wish to make any further detailed comments?*
- b) *Please endeavour to agree DMP measures with the Applicant.*
- c) *Is the DMP referred to by CCC the same document that is referred to as the 'detailed decommissioning plan' which is provided for at R9(2)(b)(xiv) in the dDCO [AS-139]?*
- d) *Which local authority would be responsible for approving this? If it is not CCC, would CCC be given an opportunity to comment?*
- e) *Are there any other air quality-related mitigation measures / requirements that CCC or SCDC thinks should be included?*

**Answer:**

**CCC**

- a) This matter is a matter for the City Council
- b) The City Council confirms it will endeavour to agree the final draft of the DMP with the Applicant although it is not in a position to agree it as yet at this stage.

- c) The City Council is aware of only one draft Decommissioning Plan submitted alongside the Code of Construction Practice (Parts A and B) and that is the one referenced by the Council when seeking agreement in detail before work commences [AS-161].
- d) Whilst the County Council is the principal relevant local planning authority in respect of the DCO on the basis that the development proposal is a waste scheme as “decommissioning” of the existing WWTP is the City Council’s concern as it is most affected by this. As such it is considered that the Applicant should consult with the City Council on the final content of the DMP *prior to commencement of the decommissioning work* (this is the standard approach within the planning regime) albeit the recommendation will be that the requirements should be discharged by the County Council in consultation with SCDC and City Council.
- e) The City Council considers that the air quality impacts of the proposed development on its area are negligible. The City Council does not consider that there is a need for any additional air quality requirements that should be added or for any additional air quality mitigation measures to be agreed. The City Council expects that the final DMP will consider all necessary / appropriate Environmental Health topic areas for the decommissioning phase of the work and will seek to ensure these matters are addressed and agreed therein.

## 5. BIODIVERSITY

### Q NO. 5.9

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**Directed to: CCC**

**Question Cambridge Local Plan 2018:**

*Do you consider that ES Chapter 8 [AS-026] sufficiently addresses Policy 70 of the Cambridge Local Plan 2018, notably in relation to the requirement to assess the Proposed Development on Cambridgeshire-specific biodiversity action plan and their habitats?*

**Answer:**

The City Council does not consider that the Cambridge specific Biodiversity Action Plan ('BAP') and habitats will be impacted. However, as the development proposed would be located in South Cambridgeshire, the City Council defers to SCDC and the CCoC on any matters relating to Biodiversity.

### Q. No. 5.13

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**Directed to: Applicant, National Trust (NT), Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire (WTBCN), Cambridgeshire County Council, CCC, SCDC**

**Question: Impacts from recreational pressure on Stow-cum-Quy Fen SSSI**

*Do you agree with the proposed wording set out on pages 18 and 19 of NE's RR [RR-015] regarding dDCO R11 and do you consider this would act as a suitable solution to address concerns regarding the impacts from increased recreational pressure on Stow-cum-Quy Fen SSSI ([RR-015] para 4.3.21 and 4.3.22)?*

**Answer:**

As the development proposed would be located in South Cambridgeshire, the City Council defers to SCDC and the CCoC on any matters relating to Biodiversity.

### Q. NO. 5.14

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**Directed to: NE, EA, NT, CCC, Cambridgeshire County Council, SCDC, WTBCN**

**Question: Comments on updated information submitted by the Applicant.**

*Please review and comment on the additional information provided by the Applicant in response to the ExA's Procedural Decision [PD-004], regarding the impacts of the Proposed Development on biodiversity with particular reference (but not limited to): the outline Outfall Management and Monitoring Plan (oOMMP) [AS-073]; the draft CEMP [AS-057]; Commitments Register [AS-125]; and the Preliminary Ecological Appraisal [AS-072].*

**Answer:**

The City Council welcomes the additional information provided by the Applicant, which provided additional details for their proposals as referred. However, as the development proposed would be located in South Cambridgeshire, the City Council defers to SCDC and the CCoC on any matters relating to Biodiversity.

**Q. NO. 5.21**

**Directed to: Applicant, NE, Cambridgeshire County Council, CCC, SCDC**

**Question: *Introduction of reed bed system at the proposed outfall***

*EA [RR-013] recommends the inclusion of a reed bed system being implemented at the exit of the outfall, before reaching the watercourse, in order to keep a steady discharge flow and keep the water clean. Do you agree with / have any comments or concerns regarding this suggestion?*

**Answer:**

The City Council agree with the recommendations made by the EA and have no further comments to make. As the development proposed would be located in South Cambridgeshire, the City Council defers to SCDC and the CCoC on any matters relating to Biodiversity.

**Q. NO. 5.36**

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**Directed to: SCDC, CCC**

**Question: *Review of ES Chapter 8 Biodiversity appendices***

*Have Appendix 8.4: Ornithology Baseline Technical [APP-089] and Appendix 8.8: Badger Technical Appendix [APP-093] now been reviewed and do you have comments on these documents ?*

**Answer:**

**CCC** - The City Council have no issues to raise with regard to appendix 8.4: Ornithology Baseline Technical [APP-089] and Appendix 8.8: Badger Technical



Appendix [APP-093]. As the development proposed would be located in South Cambridgeshire, the City Council defers to SCDC and the CCoC on any matters relating to Biodiversity.

### **Q. NO. 5.39**

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**Directed to: WTBCN, Cambridgeshire County Council, CCC, SCDC NE,**

**Question: Effects - habitats**

*In reference to the impacts of the Proposed Development on habitats within ES Chapter 8 [AS-026], do you agree that the residual effect on habitats would be moderate beneficial (significant)?*

**Answer:**

As the development proposed would be located in South Cambridgeshire, the City Council defers to SCDC and the CCoC on any matters relating to Biodiversity.

### **Q. NO. 5.41**

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**Directed to: WTBCN, Cambridgeshire County Council, CCC, SCDC**

**Question: Protection of reptile species**

*Are the mitigation measures proposed to protect reptile species set out within ES Chapter 8 [AS-026] (and detailed within the CoCP Practice Part A [APP-068] and the Reptile Mitigation Strategy within the LERMP [AS-066]) sufficient to ensure that reptile species present would be protected from killing or injury?*

*Do you agree with the Applicant that the impact on reptiles directly and their habitats from construction is neutral?*

**Answer:**

As the development proposed would be located in South Cambridgeshire, the City Council defers to SCDC and the CCoC on any matters relating to Biodiversity.

## 6. CARBON EMISSIONS AND CLIMATE CHANGE MITIGATION AND ADAPTATION

### Q. NO: 6.11

**Directed to: Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC)**

**Question: *Baseline carbon emissions***

*To what extent do you consider the DM0 baseline being representative of “existing” conditions, when this includes rebuilding the existing treatment plant (rather than using existing carbon emissions from WWTP / upgrading as necessary to meet population demands at existing site)?*

**Answer:**

The City Council is content with the baseline presented in DM0. The option of upgrading the existing WWTP was ruled out as not feasible at an early stage due to a number of reasons. It would therefore not be a realistic comparative baseline to gauge the impact of the project on carbon emissions.

### Q. NO: 6.44

**Directed to: Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC)**

**Question: *Carbon Management Plan***

*Please review and provide comments on the acceptability of the outline Carbon Management Plan [AS-076].*

**Answer:**

The City Council is content with the definitions used within the proposed Carbon Management Plan ('CMP') and the emissions Scopes for operational carbon align with the Greenhouse Gas Protocol 2004 in the Councils' view.

The CMP clarifies Anglian Waters (the applicant) commitment to net zero operational emissions definition and commitment to net zero operational emissions as outlined in the Water UK Route map 2019.

The two operational baselines set out in the CMP document align with the operational carbon assessment provided in ES Chapter 10, Section 4.4 [Ref. APP-042] as follows:

- DCO Preferred Option – Gas to grid.

- DCO – Combined heat and power (CHP)

The assessments carried out to date demonstrate that the DCO preferred option which includes gas to grid technology is estimated to be carbon positive within the first year of operation and therefore is unlikely to require any additional carbon offsets. The CMP document [AS-076] identifies two factors that may impact on the ability of the development to deliver the estimated savings, and these are:

- The assumption that the scheme will displace fossil-fuel derived natural gas up to 2050 – this does not take into account the fact that decarbonisation of the grid will likely reduce the carbon benefits of exports from proposed development.
- Direct process emissions are not yet included as the applicant is still working with DEFRA and Ofwat to improve monitoring, measurement and management of these.

It is noted that the CMP makes no attempt to quantify the impact of these factors on the ability of the scheme to deliver its net zero carbon targets. The City Council understands that these are difficult to quantify at this stage. In the City Council's view the current CMP which is in outline is sufficiently worded to ensure that the detailed CMP will report emissions accounting for the change in the carbon value of exported biomethane and account for any change in the scale of offsets if required. The Council would expect that the possible impact of these and that any shortfall will be addressed by the control measures outlined in this plan as it is updated at key decision making milestones.

The DCO combined heat and power ('CHP') option incurs residual emissions of 8,000 tCO<sub>2</sub>e across its 30-year operational lifespan [ref doc APP-042] and as with the preferred option, process emissions have been excluded.

The CMP document offers sufficient reassurance that the applicant has a well-established carbon management process in place (independently verified to PAS2080:2016) [ref doc APP-042, Table 1-1], which the City Council can confirm represents best practice within the infrastructure sector.

The control measures, carbon removals and offsets put in place (other than gas to grid or CHP) [set out over pages 10 and 11 of the outline CMP] include the following:

- Improve energy efficiency, energy recovery to reduce imported grid power demand;
- BREEAM 'Excellent' on appropriate buildings;
- 5.6 mWp solar PV – size to be confirmed but should provide 19% of sites power demand;
- Building user and transport engagement measures;
- Land use change for carbon removal, in line with calculations performed in Section 4.3 of the ES Chapter 10: Carbon (App Doc Ref 5.2.10);

- The details of chosen offsets will be provided as part of ongoing revisions of the detailed OCMP and will be reviewed over the lifecycle of the Proposed Development

The applicant's offsetting strategy plans [AS-076, Table 4.1] to ensure sufficient offsets are available to cover up to 8,040 total net annual emissions. This in the Councils' view should ensure the DCO CHP option also delivers the applicants net zero carbon commitment.

The CMP document presents in the City Council's view the reasonable worst-case scenario and which gives confidence that further reductions will be achieved through future design and delivery stages.

The City Council is generally supportive of the information provided within this initial outline CMP. The definitions, baselines and data used are acceptable and align with industry standards and the information presented in ES Chapter 10.

The CMP document is in the City Council's view light on detail in relation to carbon removal and offsetting plans, but it is understood that these are dictated by which option (DCO gas to grid or DCO CHP) is taken forward by the proposed development. The City Council considers attempts to quantify and manage process emissions should be included in any amended/updated plans at the earliest opportunity.

Monitoring and reporting are in the City Council's view key to the success of this project in carbon terms, but the document states that the CMP is to be a live document that will continue to be updated annually to report residual operational emissions and associated scale of offsets secured to address these residual emissions.

It is the City Council's view that a live reporting system will be crucial to the success of the project in carbon terms. There are still a number of assumptions applied to the scheme at this stage and the accuracy of the operational carbon footprint of the scheme is dependent on clarity which will only come over time as key decisions are made, such as gas to grid or CHP. Monitoring and updates at these key decision-making milestones (as set out in the document), will give the reassurance of more accurate operational carbon reporting.

The CMP document sets out the minimum number of revisions of the CMP along with revisions triggers to account for the outcomes of various decision points. The City Council is satisfied that the information that is currently lacking in this document will be addressed in the detailed CMP that evolves as the process moves forward.

## 7. COMMUNITY

### Q. NO: 7.35

**Directed to: Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC)**

**Question: Employment**

RR [RR-175] states that *Anglian Water promote the benefit of a growth of 15,000 jobs at North East Cambridge should the relocation be permitted (AW 7.5). However, these employment growth targets have been identified as attainable at North East Cambridge by the Local Planning Authority in preparation for the existing Local Plan without a relocation of the Waste Water Treatment Works (SCDC CNFE 2014) and would not therefore be directly attributable to a relocation.*

What is your opinion on this comment and why?

**Answer:**

The 2014 Cambridge Northern Fringe East (CNFE) was the initial Issues and Options (I&O) consultation on the now, NECAAP. It was not an adopted development plan and is not existing policy as suggested.

The 2014 I&O report put forward four potential redevelopment options for the CNFE area. Option 1 retained the existing CWWTP in situ and unaltered. It suggested c.13,600 jobs could potentially be provided on surrounding land, primary through low grade industrial use (15.9ha) to screen the existing CWWTP operation, and 24.8ha in Office and R&D use, primarily around the station and intensification of Cambridge Business Park, St John's Innovation Centre, and Nuffield Road.

The issue with Option 1 was the level of amenity that could be achieved if the CWWTP was to remain, and whether this would impact deliverability. The NEC Odour Study confirms the odour contours cover the entirety of the then CNFE area. The City Council notes that there has been no barrier to bringing forward the form and quantum of growth proposed by Option 1 over the past 20+ years and yet this hasn't materialised. It is therefore strongly suggested that the market has determined that this is not a realistic or feasible proposition.

Option 2 within the 2014 I&O's report proposed the CWWTP be consolidated into the north-east corner of its existing site and enclosed (i.e. be placed inside a building to further minimise its odour and operational impacts). This option could potentially achieve 15,600 jobs and would have allowed for housing on the more peripheral sites. A significant portion of the land area was still given over to low grade industrial uses to adjoin the consolidated CWWTP facility (7.5ha), with the same amount of

land as Option 1 being given over to office and R&D use (24.9ha). Through consultation however, Option 2 was effectively 'ruled out' as being technically very difficult to deliver and unlikely to be feasible and viable.

Neither of the above options were therefore take forward in the further iterations of the emerging future policy strategy for the NEC area through the Area Action Plan.

### **Q. NO: 7.38**

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**Directed to: Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCC)**

**Question: Community Liaison Plan**

*Is the Community Liaison Plan [AS-132] sufficiently comprehensive? If not please describe any additional measures, you would wish to be included.*

**Answer:**

The City Council consider that the Community Liaison Plan [AS-132] is sufficiently comprehensive and no further measures need to be added.

### **Q. NO: 7.39**

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**Directed to: Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCC)**

**Question: Equalities Impact Assessment (EqIA)**

*Does the EqIA [APP-211] provide an appropriate level of detail for effects on equalities groups to be taken into account as part of the decision-making process in accordance with NPSWW and the PSED?*

**Answer:**

The City Council consider that the EqIA does provide an appropriate level of detail in order for any effects on equalities groups to be taken into account as part of the decision-making process in accordance with the NPSWW and the PSED.



## 8. COMPULSORY ACQUISITION (CA) AND TEMPORARY POSSESSION (TP)

No questions directed to CCC or SCDC

## 9. DESIGN

### Q. no: 9.2

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**Directed to: CCC, SCDC, IPs**

**Question: Design review**

*Please comment on the desirability of implementing a Design Review Panel to provide an informed 'critical friend' on the developing proposals, to ensure that good quality sustainable design and integration of the Proposed Development into the landscape is achieved in the detailed design, construction and operation of the project.*

**Answer:**

The City Council considers that an independent Design Review would be a welcome tool in the assessment and development of the Proposals. It would in the Councils' view have also been a useful tool at an earlier stage when the design proposals were in conceptual stages as a more linear character for the bunds would have been encouraged as it is more aligned to the existing landscape character of the area.

The City Council considers that the additional expertise from such a panel applied to design, construction, operation and maintenance of the development would be invaluable in ensuring good quality sustainable design and integration of the Proposed Development into the landscape is achieved in the detailed design, construction and operation of the project.

### Q. no 9.5

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**Directed to: CCC, SCDC**

**Question: Detailed design**

*Are you satisfied that you have sufficient design expertise to ensure good design of the Proposed Development (including the proposed WWTP, bunding and landscaping) in respect of discharging R7 of the dDCO [AS-139], were development consent to be granted?*

**Answer:**



The City Council has sought the views of the members of their Landscape team. The Council's Landscape Officers include Chartered Members of the Landscape Institute, and each have a significant level of experience. As such the City Council are satisfied that they have sufficient design expertise to ensure that good design is achieved if consent is to be granted.

## 10. DRAFT DEVELOPMENT CONSENT ORDER (DDCO)

### Q. No: 10.3

**Directed to: Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC)**

**Question: General**

*The ExA understands that R17 relates to the decommissioning of the existing WWTP as per the definition in Sch 2, Part 1 of the dDCO [AS-139].*

- a) Should there be a requirement for, and which also details appropriate information for, the eventual decommissioning of the proposed WWTP; and*
- b) If not, would this mean that it would remain on the site for an infinite period?*

**Answer:**

The City Council consider that there should be a requirement for the eventual decommissioning of the proposed WWTP to ensure that contamination risks are minimised.

### Q. No: 10.12

**Directed to: Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question: Questions / comments relating to Requirements**

*Where requirements are to be discharged by the relevant planning authority, please clarify how this would occur efficiently and with the whole project bearing in mind there may be some crossover between CCC and SCDC? Would there be a need for these authorities to work together to discharge requirements and if so, is this reflected in the dDCO [AS-139]?*

**Answer:**

The planning departments of the City Council and SCDC operate jointly under the Greater Cambridge Shared Planning Service (GCSP). As such, any matters relating to the discharge of requirements that require consideration either by the City Council or the District Council would be considered under this joint planning service.

Both CCC and SCDC would however defer to Cambridge County Council as the Minerals and Waste Authority in the first instance for all requirements. For those matters that either Cambridge City Council or South Cambridgeshire District

Councils would normally deal with in respect of a planning permission under the Town and Country Planning Act 1990 i.e. landscape, noise, odour, etc, both Councils would expect to be consulted by the County Council.

### **Q. No: 10.20**

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**Directed to: Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question: Questions / comments relating to Requirements\_**

*R17 states that decommissioning must be started no later than 3 months following the completion of commissioning, or longer if agreed by the relevant planning authority. Should this requirement also specify the maximum duration which decommissioning works should take?*

**Answer:**

The City Council would defer to Cambridge County Council as the Minerals and Waste Authority in relation to decommissioning. However, the Councils consider that there ought to be a mechanism in place to ensure that once decommissioning commences these works should continue with as little delay as possible to ensure that any potential contamination risks are mitigated.

### **Q. No: 10.26**

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**Directed to: Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC)**

**Question: Questions / comments relating to Schedules (Sch)**

Sch 2, Part 2, 1(2)(a) and (b) – please confirm whether you are content with the specified 42-day time period for discharging requirements?

**Answer:**

The City Council would defer to Cambridge County Council as the Minerals and Waste Authority in respect of discharging requirements.

## 11. GREEN BELT

### Q. NO: 11.6

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**Directed to: Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question: Existing WWTP**

*The ExA notes that the remediation of the existing WWTP site and its redevelopment for housing are not secured through the dDCO and that the site is not formally allocated for such a purpose in the relevant development plan. On this basis, what weight should the ExA afford to its potential for any redevelopment and housing delivery as contributing to the very special circumstances needed to outweigh the harm to the Green Belt, and any other harm, by reason of the inappropriateness of the Proposed Development?*

**Answer:**

The City Council agrees as a matter of fact that the DCO does not seek consent for the remediation of the existing WWTP site or indeed any subsequent redevelopment of the site once the site is vacated. It is also correct that existing WWTP site is not the subject of a detailed allocation policy under the current local plan but clearly is part of the area identified for potential strategic redevelopment in South Cambridgeshire Local Plan 2018, Policy SS/4 and South Cambridgeshire Adopted Policies Map 2018 Inset B and also Cambridge Local Plan 2018, Policy 15 as an Area of Major Change). The Councils however have explained in their submissions to the ExA in ISH2 and also as part of their LIRs why the ExA and the Secretary of State can have clear confidence in the support for the redevelopment of the site in the event that it is at last unlocked by the removal of the WWTP and in the force of logic in considering whether to allow for WWTP to vacate the site and move to another before a plan policy that allocates such a site can possibly be found deliverable and sound.

That confidence comes from the evidence of the effect of the HIF funding award and the fact that it is subject not only to the implementation of the DCO but also the requirement that the applicant should bring forward a planning application to seek permission for the redevelopment of the existing CWWTP site, that includes the provision of c.5,500 new homes.

The landowners have actively engaged in the development of the draft NECAAP which flows from the above referenced policies in the existing plans, including preparation of evidence base studies that confirm the site is capable of being developed for residential use – such as the Surface Water Drainage Core Principles (November 2021), Integrated Water Management Study (August 2021), Area Flood Risk Assessment (June 2020), Ecology Study (June 2020), Noise Model and Mitigation Assessment (June 2020), and Phase 1 Geo-Environmental Desk Study (November 2021).

More recently, the master-developer appointed by Anglian Water and the City Council, has commenced pre-application discussions with the Shared Planning Service, including entering into a Planning Performance Agreement, to advance the proposal for the site.

Given the above, the Council considers that as part of the ExAs and Secretary of State's decision making the history of the importance of North East Cambridge as a location for future development of Cambridge and the fundamental role the release of WWTP site has in realising these long held aims means substantial weight should be given to the future redevelopment of the site and wider area. The significance of the contribution the availability of the existing CWWTP site would have once AW has departed and would make towards meeting future strategic housing requirements for the Greater Cambridge area is set out in the evidence supporting the NECAAP as well as emerging plan.

The Councils consider that the substantial weight can be afforded to the consequential benefits that would flow from the release of the WWTP site and which can form part of very special circumstances in the context of Green Belt policy.

To that end the Councils would emphasise that it would not be possible to have 'secured' the development of the WWTP in the way suggested in the question in any event i.e. by trying to allocate site beyond the extent shown in the existing plan as part of an adopted plan because of the continued presence of the WWTP and the issue, until the HIF funding award, of the difficulty of its being released. In addition, given the limitations of any housing that can lawfully be brought forward as part of a DCO (see s115 of the Planning Act 2008) it is not surprising that the applicant did not seek to include a housing proposal as part of this DCO.



## 12. HEALTH

### Q. No: 12.2

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**Directed to: Cambridge City Council (CCC),**

**Question: Policy – Local Plan**

*Has the Applicant identified the correct 2018 Cambridge Local Plan policies at 1.3.4 of ES Chapter 12: Health [APP044] for the purposes of assessing impacts on health? If not, which policies should be taken into account?*

**Answer:**

The City Council considers that the applicant has identified the correct 2018 Cambridge Local Plan policies in the ES for the purposes of assessing impacts on health.

The ExA is also referred to the City Council's LIR (para 12.34), which confirms that the proposed development would, in the City Council's view, accord with the principles of Policy 35 of the 2018 Local Plan and to section 12 of the LIR generally.

### Q. No: 12.3

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**Directed to: Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC)**

**Question: Policy – Local Plan and SCDC SPD**

- a) *Is the 'South Cambridgeshire District Council Local Development Framework, Health Impact Assessment, Supplementary Planning Document (Adopted March 2011)' referred to at 1.3.4 of ES Chapter 12 [APP-044] still in force?*
- b) *If yes, which 2018 Local Plan policy does this relate to?*
- c) *If yes, please provide a copy.*
- d) *Is the Applicant's HIA sufficiently comprehensive to address current policy?*
- e) *Has the Applicant identified and assessed the application against the correct 2018 Local Plan policies?*

**Answer:**

The City Council would defer this to SCDC as the policy relates to the South Cambridgeshire Local Plan.

### Q. No: 12.15

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**Directed to: Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC)**

**Question: Proposed WWTP – Mitigation Measures**

*In relation to the operational phase of the proposed WWTP, on page 74 of ES Chapter 12 [APP-044] it is stated that the potential risk to human health from water pollution would be dealt with in documents which form part of the Construction Environmental Management Plan (CEMP).*

*Given that the CEMP would relate to the construction phase, is this the most appropriate mechanism to deal with operational phase effects? If not, how should this be dealt with / secured?*

**Answer:**

The City Council consider that the CEMP would be an appropriate mechanism to deal with the construction phase effects upon human health. Once the development is operational, matters relating to pollution would be the statutory responsibility of the Environment Agency as the relevant regulator.

## 13. HISTORIC ENVIRONMENT

### Q. No: 13.1

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**Directed to: Historic England, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC) Cambridge County Council (CCoC)**

**Question: Assessment**

*Are the parties satisfied with the heritage assessment and effects as reported in ES Chapter 13 [AS-030]. If not, please explain the reasons why.*

**Answer:**

No heritage issues arise for the City Council and SCDC have set out its position on heritage matters in its LIR.

### Q. No: 13.17

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**Directed to: Historic England, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC) Cambridge County Council (CCoC)**

**Question: Archaeology**

*Are the parties satisfied with the level of detail in the outline Archaeological Investigation Mitigation Strategy (AIMS) [AS-088] and CoCP Part A [APP-068] to inform the AIMS secured under R13 of the dDCO [AS-139]?*

**Answer:**

No archaeological issues arise for the City Council.

## 14. LANDSCAPE AND VISUAL

### Q. no:14.1

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**Directed to: CCC, SCDC, CCoC**

**Question: Assessment**

*Please confirm whether you are satisfied with:*

- a) *the study area; and*
- b) *the viewpoint (VP) / photomontage locations selected, as identified within ES Chapter 15: Landscape and Visual Amenity [AS-034]. If not, please explain the reasons for this.*

**Answer:**

- a) The Councils can confirm that they are satisfied with the study area identified by the appellant. The study area was discussed and arrived at via consultee discussions using sample photography and ZTV mapping.
- b) The Councils can confirm that they are satisfied with the viewpoint and photomontage locations selected by the appellant. There are 41 representative viewpoint and receptor locations with 7 being used for photomontages where visibility has a high incidence of expected impact as well as a high rating for-receptor sensitivity.

### Q. no:14.2

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**Directed to: CCC, SCDC, CCoC**

**Question:**

*Please confirm whether you are satisfied with:*

- a) *the Applicant's Landscape and Visual Impact Assessment (LVIA) methodology; and*
- b) *its assessment of effects in respect of landscape and visual receptors.*
- c) *If not, please explain the reasons for this.*

**Answer:**

The City Council makes no comment about the LVIA as there are no landscape impacts associated with the City Council.

## 15. LAND QUALITY

### Q. No: 15.5

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**Directed to: EA, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC)**

**Question: Monitoring**

*Within ES Chapter 14 Land Quality [AS-032], the Applicant concludes that no monitoring is required for decommissioning of the Proposed Development for land quality purposes. Do you agree with this conclusion? If not, what monitoring do you propose?*

**Answer:**

The City Council considers that the decommissioning works will not require any long-term monitoring with regards to land quality prior to redevelopment of the land for Cambridge City Council Environmental Health purposes.

The City Council's remit sits within the protection of human health and as long as any contaminated material remains undisturbed beneath the surface, there is no plausible human health risk (in addition to the source of contamination, there must also be a pathway to the surface and the presence of a human receptor for Environmental Health to consider remediation or monitoring). The decommissioning works only involve above-surface work and therefore human exposure to contaminants beneath the surface will become a risk only when excavation work begins for new / future development. Contaminated land risks to human health at that point in time will be dealt with through the usual / standard planning process under the Town and Country Planning Act 1990.

The Environment Agency will need to provide advice on any residual risks to controlled waters / groundwater as that falls outside the Council's area of expertise and control.

### Q. No: 15.10

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**Directed to: CCC, SCDC Cambridgeshire County Council (CCoC)**

**Question: Mineral Safeguarding Areas**

*Do you consider that the Mineral Safeguarding Areas are adequately protected and do you consider the Applicant's conclusions within ES Chapter 14 [AS-032] regarding mineral safeguarding are acceptable and meet with local and national policy requirements?*

**Answer:**

It is considered that queries on Mineral Safeguarding Areas comes under the remit of Cambridgeshire County Council.

### **Q. No: 15.13**

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**Directed to: CCC, SCDC, Cambridgeshire County Council (CCoC), EA**

***Question: Review of additional information provided by the Applicant in response to ExA's Procedural Decision***

*Please provide comments on the updated information contained within ES Chapter 14 [AS-032] and the associated new and updated appendices [AS-089 to AS-098] in relation to the impacts on land quality received on 29th September 2023 from the Applicant.*

**Answer:**

The Submitted LIR reflects the updated information contained within ES Chapter 14 [AS-032] and the associated new and updated appendices [AS-089 to AS-098]. With regard to the updated information referred to, the City Council notes that a number of appendices associated with Chapter 14 have been updated within the additional submission 29th September 2023, however this has not led to any revision of the text of Chapter 14.



## 16. MAJOR ACCIDENTS AND DISASTERS

### Q. NO: 16.6

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**Directed to: Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question: Planning policy**

*Para 1.3.4 of ES Chapter 21 [AS-042] introduces local policy by noting that Local planning policies of relevance to the Proposed Development includes: [...]*

- a) *Are there any other policies that should be taken into account which are not listed in this chapter of the ES?*
- b) *Are there any emerging local policies that you consider to be potentially Important and Relevant?*
- c) *Are there any Neighbourhood Plan or Minerals and Waste Local Plan policies that you consider to be potentially Important and Relevant?*
- d) *Are the local authorities content that all relevant development plan policies have been referred to? If not, which additional or alternative policies should be included?*

**Answer:**

- a) The City Council considers that there are no other policies relating to major accidents and disasters which need to be listed or taken into account as part of ES Chapter 21 [AS-042]
- b) There are no emerging plan policies relating to major accidents and disasters that are potentially important and relevant.
- c) The City Council consider that the Waterbeach Neighbourhood Plan (2022) - Policy WAT 6 (Development and road safety in Waterbeach village) is potentially important and relevant and is noted within SCDC LIR Appendix 1, no.40.
- d) The City Councils is satisfied that all relevant development plan policies have been referred to as part of the ES Chapter 21[AS-042] in respect of major accidents and disasters.

## 17. MATERIAL RESOURCES AND WASTE

### Q. NO: 17.5

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**Directed to: Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question:** *Policy – NPSWW*

*Para 4.14.5 of NPSWW states that the applicant should set out the arrangements that are proposed for managing any waste produced and prepare a Site Waste Management Plan. R9 of the dDCO [AS-139] indicates that a SWMP would be part of the construction environmental management plans to be submitted after an Order is made. Are the relevant authorities content with this approach or do you require further detail at this stage? If further detail is required at this stage, please explain why you do not consider it appropriate to deal with such detail under R9 of the dDCO.*

**Answer:**

The City Council would defer to the County Council as the Minerals and Waste Authority in respect of this question.

### Q. NO: 17.8

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**Directed to: Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question:** *Policy – adopted and emerging Local Plan and SPDs*

- a) *Do you agree that the policies listed in ES Chapter 16 are relevant to the determination of this application?*
- b) *If not, which policies should be disregarded?*
- c) *Have any policies been omitted which should be taken into account? If so, which?*

**Answer:**

The City Council considers that the policies outlined in Chapter 16 of the ES [APP-048] are relevant to the ExA's assessment and the Secretary of State's decision making. However, the Council would defer the full answer to the matters to the County Council as the Minerals and Waste Authority.

## **Q. NO: 17.13**

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**Directed to: Cambridge City Council (CCC)**

**Question: *Environmental Statement – Scope***

*Is CCC, as local authority for development at NEC, satisfied that it is appropriate to exclude demolition of the existing WWTP from this DCO application, bearing in mind that any impacts associated with the demolition could have to be taken into account in the determination of a planning application for NEC? What are the Council's views on the site potentially remaining uncleared or undeveloped for a number of years?*

**Answer:**

As noted above in answering ExQ1 Question 11.6 the City Council's understanding that the applicant will be submitting a separate planning application for the proposed development of the NEC.

In terms of the scope of the ES in relation to the DCO application and in particular whether the City Council has concerns about whether the future demolition of the WWTP as part of the future planning application should have been included in the DCO related ES, it is assumed this is by reference to a cumulative impact assessment.

From the submitted Cumulative Effects Assessment (CEA) [AS-044] the City Council understands redevelopment of the existing Cambridge WWTP would be subject to separate consents and supported by an assessment of environmental impacts including the development of mitigation measures. These measures would cover demolition activities and be controlled via a CEMP/CTMP. In terms of the forthcoming planning application, as detailed in the City Council's LIR, pre-application engagement on this proposal has begun. The CCC is satisfied with the applicant's approach.

## **Q. NO: 17.18**

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**Directed to: Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC)**

**Question: *Proposed WWTP – use of resources.***

*It has been suggested in some RRs (such as [RR-167]) that there is no operational reason to replace the existing WWTP and that the plant / equipment is still fit for purpose. On the basis that there is no operational need to replace the existing WWTP, should the use of resources and the generation of waste (as explained in ES Chapter 16 [APP-048]) to build the proposed WWTP and associated works be given positive, neutral or negative weight in the planning balance?*

**Answer:**



The City Council would defer the answer to the matters raised in the question to the County Council as the Minerals and Waste Authority.

## 18. NOISE AND VIBRATION

### Q. NO: 18.17

**Directed to: Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question: Working hours**

*Do you consider the proposed construction working hours within the CoCP Part A [APP-068] (Table 5.1) to be acceptable in terms of the impacts which may be generated in relation to noise and vibration to nearby sensitive receptors?*

**Answer:**

The proposed construction hours and potential noise and vibration impacts fall within the remit of the South Cambridgeshire District Council Environmental Health officers (EHOs) not those of the City Council.

### Q. NO: 18.21

**Directed to: Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question: Assessment**

*In various instances within ES Chapter 17 [AS-036], where there are limitations of available existing data, the Applicant has applied professional judgement (e.g. para 4.2.8). Do you find these conclusions sufficiently justified and acceptable?*

**Answer**

The City Council considers that the approach adopted, and the conclusions drawn sufficiently justified and acceptable. In terms specifically of the noise assessment provided in respect of the decommissioning work (paragraphs 4.4.1 - 4.4.26 of ES Chapter 17), the City Council considers the methodology and assumptions made are satisfactory' and as such the City Council have no concerns with the data used and presented for this part of the ES and the way that the applicant has addressed the circumstances where there has been a limit on the data.

**Q. NO: 18.30**

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**Directed to: Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question: Further assessment**

*Do you consider the proposed noise and vibration management plan, which would be required by R9 of the dDCO [AS139], should include further noise assessments of sensitive receptors in accordance with BS4142, and/or should include real time monitoring and management of noise in order to suitably mitigate effects of the proposed construction works?*

**Answer**

The City Council, in addressing this question, has considered the limited scope of the decommissioning work and the low sensitivity nature of the surroundings (industrial / commercial). In the City Council's view, a BS4142 survey (which largely relates to the assessment of commercial / industrial noise in a mixed residential / industrial setting) is not considered necessary therefore for the decommissioning work.

**Q. No: 18.31**

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**Directed to: Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question: Review of additional information submitted by the Applicant.**

*Please review and comment on the acceptability of the draft Construction Environmental Management Plan [AS-057] in relation to noise and vibration.*

**Answer**

The City Council considers that, notwithstanding the issue of clarity on the assigned sensitivity of the noise sensitive receptor locations (as mentioned within Sections 8.5 - 8.7 of Cambridge City Council's Local Impacts Report), it is generally satisfied with the draft Construction Environmental Management Plan and with the noise mitigation measures proposed for the decommissioning work.



## 19. ODOUR

### Q. NO: 19.5

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**Directed to: EA, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question: Assessment**

*Do you consider one odour emissions rate survey during July 2019 and three sniff surveys during April and May 2022 to be sufficient for the baseline odour assessment?*

**Answer**

The City Council considers that the surveys referred to are sufficient in broad terms for the baseline odour assessment. The assessment identified a number of baseline odours which in the Councils view as advised by its officers would be expected of the locality and is it therefore, sufficient. The Councils are not aware of any additional sources of odour (baseline) which have not been considered or identified by the applicant.

### Q. NO: 19.7

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**Directed to: Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question: Data**

*ES Chapter 18 [APP-050] states in the summary that - As the proposed waste water treatment plant (WWTP) does not currently exist, the quantitative odour predictions applied estimated emission rates from measurements taken at the existing Cambridge WWTP from a July 2019 odour survey during the summer months.*

*Are there any design differences between the existing Cambridge treatment works and the proposed treatment works that might make the use of this survey data unrepresentative of the conditions at the proposed new treatment works?*

**Answer:**

The City Council has been advised by its relevant officer that the odour data is likely to be comparable with the existing WWTP data.

## **Q. NO: 19.13**

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**Directed to: EA, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

### **Question: Assessment**

*The IAQM 2018 guidance on assessing odour impacts for planning, in Appendix A1.2.2 states that a qualitative risk-based approach towards assessment is appropriate under certain circumstances.*

*Other than the odour impacts for the operation of the proposed WWTP, the assessment of odour impacts is determined in a qualitative approach. Do you accept the Applicant's approach towards assessment of odour impacts in this regard?*

### **Answer**

The City Council considers that the methodology in respect of odour impact assessment [Doc. Ref. 5.2.18] [APP-050] is acceptable in principle. Please refer to the City Council's Local Impact Report (Section 9 - Topic 4 - Odour Impacts)

## **Q. No: 19.15**

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**Directed to: Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

### **Question: Mitigation**

*Within ES Chapter 18 [APP-050], the magnitude of effects from odour release from the connection of Waterbeach pipeline to the new pumping station, breaking open the existing sewer and connection of the Waterbeach pipeline to the existing sewer are described as small. This is in part because they would occur intermittently and for no more than 4 weeks. In your view, should these works to be limited to no more than 4 weeks within the CoCP Part B [AS-161] to ensure that the magnitude of the effect would remain small as proposed by the Applicant?*

### **Answer:**

The questions relate to the suitability / appropriateness of the evidence base submitted in support of the proposed new WWTP facility at Honey Hill. Cambridge City Council's Environmental Health Officers have reviewed and assessed the information relevant to the decommissioning of the existing WWTP site only as (this is the only aspect of the proposed development that falls within the City Council's jurisdiction). The City Council cannot therefore assist further on this question.

## 20. TRAFFIC AND TRANSPORT

### Q. No: 20.12

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**Directed to: Applicant , Cambridge City Council (CCC)**

**Question: Policy – local**

*Para 1.3.4 of ES Chapter 19 [AS-038] says that Policy SS/4 (Cambridge Northern Fringe) of the South Cambridgeshire District Council Local Plan 2018 is relevant. It also indicates that the emerging North East Cambridge Area Action Plan 2020 and policies 16, 17, 18, 22 of the North East Cambridge Action Plan 2021 are relevant. Please explain the relevance of these to the Examination of the application for the proposed WWTP.*

**Answer**

The City Council would defer to District Council on this matter.

### Q. NO: 20.14

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**Directed to: Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question: Policy – Local**

- a) *Is the Applicant's summary of applicable adopted and emerging local policy complete?*
- b) *Are there any other policies that should be taken into account?*
- c) *Should any of the policies noted by the Applicant be disregarded?*

**Answer:**

- a) There are discrepancies between the relevant policies outlined in the Planning Statement [doc ref. AS-128] and the Traffic and Transport Chapter of the ES [doc ref. AS-038], mainly The City Council believe Local Plan Policy 81 to be relevant, as mentioned in the Council's LIR and this policy is only listed as relevant in the Planning Statement [doc ref. AS-128], and not the ES chapter [doc ref. AS-038].
- b) As above
- c) Notwithstanding what's been outlined above, none of the policies should be disregarded however for the avoidance of doubt, Cambridge City Council Local Plan (2018) policies 5 and 81 are relevant.

**Q. NO: 20.17**

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**Directed to: Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question: Strategy documents – relevance to decision**

*ES Chapter 19 [AS-038] refers to the following documents:*

- 3.7 Cambridgeshire Long Term Transport Strategy
- 3.8 Transport Strategy for Cambridge City and South Cambridgeshire
- 3.9 Cambridgeshire County Council's Transport Investment Plan
- 3.10 Greater Cambridge Greater Peterborough Strategic Economic Plan
- 3.11 Cambridgeshire and Peterborough Combined Authority Local Transport Plan
- 3.12 Cambridgeshire Local Transport Plan ▪ 3.16 Greater Cambridge City Deal
- 3.17 Cambridge City Access

*It appears to the ExA that some of the documents / provisions noted by the Applicant relate to strategy rather than decision-making considerations. Which, if any, of the above documents do you consider to be Important and Relevant to the decision on this application? Please specify which part(s) of each document you consider to be Important and Relevant.*

**Answer:**

The City Council would defer to Cambridge County Council as the Highway Authority on this matter.

**Q. NO: 20.39**

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**Directed to: South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC), Waterbeach Parish Council, Horningsea Parish Council**

**Question: Construction traffic – alternatives**

*Applicant please respond to all parts; other parties please respond to all parts except a) and c)*

- a) *Why is construction access to temporary accesses CA16, COA9 and CA20 (illustrated on the map at page 428/554 of the TA [AS-108]) solely via Car Dyke Road / Clayhithe Road rather than via Horningsea High Street?*
- b) *Are there any known road safety issues in Waterbeach?*
- c) *Please provide an estimate of any additional mileage and the additional carbon emissions associated with that additional mileage that would be travelled by construction vehicles travelling via the A10 and Waterbeach*

*towards temporary accesses 7, 8 and 9 to avoid Horningsea High Street – para 3.8.20 of ES Chapter 2 [APP-034] suggests that the route via the A10 might be in the region of 7 miles.*

- d) *Should any additional mileage / carbon emissions be given negative weight in the planning balance, and would there be any countervailing benefits that should be given positive weight?*
- e) *Has an option been looked at where construction traffic is split between Waterbeach and Horningsea? If not, why not?*
- f) *Is CCoC satisfied that suitable mitigation has been proposed for the Clayhithe Bridge / Hartridge's Lane area in response to the issue raised by HPC (see page 59 of Applicant Regard to Section 42 Consultation Responses [APP-167])?*
- g) *Is CCoC satisfied that suitable mitigation has been proposed for Denny End Road and Bannold Road in response to the issue raised by respondents (see page 54 of Applicant Regard to Section 47 Consultation Responses [APP-166])?*
- h) *Has sufficient regard been paid to the potential for delays at the Station Road, Waterbeach level crossing (see page 55 of Applicant Regard to Section 47 Consultation Responses [APP-166])?*

The City Council defer to the Cambridgeshire County Council in their capacity as the Highway Authority for all of the above matters.

## **Q. NO: 20.56**

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**Directed to: Applicant, South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC), Network Rail Infrastructure Limited**

### **Question: Construction phase – cumulative impacts**

*Para 4.5.3 of ES Chapter 19 [AS-038] states that: the construction of Waterbeach Station Relocation has the potential to overlap with the construction of the Proposed Development and the Waterbeach New Town East. However, due to the lack of readily available construction traffic information for the Waterbeach Station Relocation, it is not possible to determine whether the cumulative effect of the simultaneous construction of the three developments would result in a significant cumulative effect. However, should construction of developments happen simultaneously, each developer would need to agree their Construction Transport Management Plan with the relevant highway and local planning authority. Para 4.5.6 concludes that: Overall, it is considered it is that the impacts of the proposed development can be mitigated limited through the proposed construction management of the transport network and are not significant.*

*To the Applicant:*

- a) *What efforts have been made to obtain construction traffic information for the Waterbeach Station Relocation?*
- b) *How can it be concluded that an effect that is not known can be mitigated?*
- c) *Could the potential for cumulative impacts be reduced or avoided by routing construction traffic through Horningsea?*
- d) *If there was a significant cumulative impact which could not be mitigated, what are the alternatives to the routing of construction traffic through Waterbeach;*

To SCDC, CCoC and Network Rail Infrastructure Limited:

- e) *Are you satisfied with the approach suggested by the Applicant?*

**Answer:**

The City Council defers to the Cambridgeshire County Council in their capacity as the Highway Authority for all of the above matters.

**Q. NO: 20.59**

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**Directed to: Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question:**

*Construction Workers Travel Plan*

*Para 1.8.2 of the CWTP [APP-150] states: The measures included with the final CWTP would be developed through consultation with the relevant local highway authority and the relevant local planning authority.*

- a) *Please set out the measures that you consider should be included.*
- b) *How should the CWTP be secured, monitored and enforced?*

**Answer:**

- a) The City Council defers to Cambridge County Council as the Highway Authority.
- b) The City Council defers to Cambridge County Council as the Highway Authority.

**Q. NO: 20:60**

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**Directed to: Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question:**

*Construction Workers Travel Plan*

*Para 4.3.1 of the CWTP [APP-150] states: Staff Parking at the construction compound for the Cambridge WWTP will be limited and all spaces will be allocated. All staff requiring a parking space will have to demonstrate that arriving by private vehicle is the most practical option.*

- a) Please explain which other travel options would be practical for members of the workforce.*
- b) How would informal parking by staff and visitors, whether on or off site, be monitored and prevented?*

**Answer:**

- a) The City Council defers to Cambridge County Council as the Highway Authority.
- b) This is a matter for the Applicant .

**Q. NO: 20:67**

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**Directed to: National Highways, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question:**

*On page xvi of ES Chapter 19 [AS-038] in respect of the proposed WWTP it is stated that ES Chapter 19 reports that significant effects on driver delay around the Horningsea Road area associated with the construction of the proposed WWTP and Waterbeach pipeline would be mitigated by the secondary measures set out in the CTMP [AS-109].*

- a) Are the measures in the CTMP sufficient / satisfactory?*
- b) Are they enforceable?*
- c) Do you have any examples of where similar measures have been successful or unsuccessful?*
- d) Who would be responsible for ensuring compliance; is it likely that they would have the resources to ensure compliance with the CTMP; and do they need additional resources to ensure compliance?*



- e) Overall, what are your views on the use of secondary mitigation to address highways impacts in this case?

**Answer:**

The City Council defers to the Cambridge County Council in their capacity as the Highway Authority for all of the above matters.

**Q. NO: 20:85**

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**Directed to: National Highways, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question:**

Operational traffic – mitigation – J34

*On page xviii of ES Chapter 19 [AS-038] it is stated that - 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. With the application of the secondary measure to restrict peak period movements the effect on driver delay is reduced to neutral which is not significant. This measure would be secured through the Operation Logistics Traffic Plan, with which no significant effects on driver delay would occur. A number of RRs express concerns about operational traffic running through the villages of Horningsea and Fen Ditton.*

- a) *Would measures in the Operational Logistics Traffic Plan (OLTP); R9 of the dDCO [AS-139]) be sufficient / satisfactory to deal with the Horningsea Road / A14 issue, and to prevent traffic from travelling through Horningsea and Fen Ditton?*
- b) *Are the measures enforceable?*
- c) *Do you have any examples of where similar measures have been successful or unsuccessful?*
- d) *Who would be responsible for ensuring compliance; is it likely that they would have the resources to ensure compliance with the OLTP; and do they need additional resources to ensure compliance?*
- e) *Overall, what are your views on the use of secondary mitigation to address highways impacts in this case?*

**Answer:**

The City Council defers to the Cambridgeshire County Council in their capacity as the Highway Authority for all of the above matters.

### **Q. NO: 20.90**

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**Directed to: Applicant, Cambridge City Council (CCC) South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question: Mitigation measures**

*Is there a need for any measures to mitigate transport-related impacts per Policy TI/2: 'Planning for Sustainable Travel' of the South Cambridgeshire Local Plan?*

**Answer:**

The City Council defers to the Cambridgeshire County Council in their capacity as the Highway Authority for all of the above matters.

### **Q. NO: 20.93**

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**Directed to: Applicant, South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question: Electric vehicle charging**

*How would electric vehicle charging points be secured to ensure compliance with (inter alia) Policy 23 of the Minerals and Waste Local Plan 2021?*

**Answer:**

The City Council defers to the Cambridgeshire County Council in their capacity as the Highway Authority for all of the above matters.

### **Q. NO: 20.94**

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**Directed to: Applicant, South Cambridgeshire District Council (SCDC), Cambridge County Council (CCoC)**

**Question:**

*Requirement 12 – OWTP*

- a) Should this requirement include a provision relating to ongoing implementation of the OWTP?*
- b) Should there be a mechanism by which the effectiveness of the OWTP can be reviewed and, if necessary, new measures agreed if targets are not being met?*

The City Council defers to the Cambridgeshire County Council in their capacity as the Highway Authority for all of the above matters.

## 21. WATER RESOURCES

### Q. NO: 21.20

**Directed to: Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC) CCoC**

**Question: Capacity**

*Some RRs (e.g. [RR-030, RR-035]) suggest that the capacity of the proposed WWTP may not be sufficient to cater for the development of Cambridge East, North East Cambridge and other planned development owing to uncertainties around future housing growth, which could lead to the plant being undersized, potentially constraining future housing growth. To what extent do you agree or disagree with this? Please evidence your stance on this matter.*

**Answer:**

The City Council would defer to the County Council as the Minerals and Waste Authority in respect of capacity.

### Q. NO: 21.48

**Directed to: Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC) CCoC**

**Question: NPSWW**

*In accordance with the requirements of NPSWW para 4.4.10, please confirm if there are any relevant national and local flood risk management strategies which apply to any part of the application site?*

**Answer:**

The City Council would defer this question to the County Council as the Lead Local Flood Authority.

### Q. NO: 21.58

**Directed to: Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC) CCoC**

**Question: NPSWW**

*Are there any Water Resources Management Plans (including any emerging plans) which are relevant to the Proposed Development? If so, please set out the interactions of the Proposed Development with such plans, in line with para 4.2.8 of NPSWW. To what extent may water supply be a constraint of any new housing development proposed within the NEC AAP or other future housing growth?*

**Answer:**

The City Council would defer this question to the County Council as the Lead Local Flood Authority.

**Q. NO: 21.59**

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**Directed to: EA, Applicant, Cambridge City Council (CCC), South Cambridgeshire District Council (SCDC), NE and CCoC**

**Question:** *Review of additional information*

*Please review and comment on the additional information provided by the Applicant in response to the ExA's Procedural Decision [PD-004], regarding the impacts of the Proposed Development on water resources with particular reference (but not limited to): the oOMMP [AS-073], Appendix 20.5 Fluvial Modelling Report [AS-113] and Appendix 20.6 3D Velocity Mixed Model [AS-114].*

**Answer:**

The City Council would defer this question to the County Council as the Lead Local Flood Authority.

## Appendix 1 – Q. No: 1.13: List of applications which have been submitted and/or determined since the submission of the DCO which might be relevant to CEA:

Application reference	Address	Proposal description	Validation date	Decision Status	Distance
23/02764/SCRE	440 Cambridge Science Park Milton Cambridge, CB4 0QA	EIA Screening Opinion for 13,000 sqm of employment floor space in buildings up to maximum 27 metres in height with associated car parking, cycle parking and landscaping	17/07/2023	EIA Screening Not Required on 25/09/2023	1km
23/01938/S73	Land North of Newmarket Road, Fen Ditton	S73 to vary condition 1 (Approved plans) of planning permission 22/03432/S73 (S73 to vary condition 29 of ref: 22/02554/S73 (Reserved matters application detailing access appearance landscaping layout and scale for the creation of 239 new homes and non-residential floorspace including 'Market Square' internal roads landscaping and associated works as part of Phase 1a of the Wing masterplan pursuant to condition 5 (reserved matters) of outline planning permission S/2682/13/OL) to enable retail unit 2 to be used for purposes covered under Use Class E(a), E(b), E(c), E(d), E(e) and E(gii) within Class E) g) to re-orientate seven houses that front Gregory Park (Lot D3) and to replace eight carports with garages (D3).	19/05/2023	Awaiting Decision	200m
23/01939/S73	Land North of Newmarket Road, Fen Ditton	S73 to vary condition 1 (Approved plans) of reserved matters application 20/02569/REM (Reserved matters application as part of Phase 1B pursuant to condition 5 (Reserved Matters) of outline planning permission S/2682/13/OL	19/05/2023	Awaiting Decision	200m

		dated 30 November 2016 (EIA Development) for detailed access, appearance, landscaping, layout and scale for the creation of 308 new homes, non-residential floor space, laying out of playing fields, open space, allotments, associated infrastructure and internal roads) to replace six two-storey houses (C2 and C3) within phase 1b with three-storey houses and to replace five carports with garages (D4).			
<b>23/01878/FUL</b>	59 Cowley Road Cambridge, CB4 0DN	Change of use and refurbishment of existing car showroom and new-build two-storey extension to create a new Operational Hub, reconfiguration and refurbishment of existing MOT garage to provide upgraded office and storage space, car and van parking, cycle parking, landscaping, and associated infrastructure.	15/05/2023	Awaiting decision	Adjacent
<b>23/01287/FUL</b>	Quy Mill Hotel Church Road Stow Cum Quy, CB25 9AF	Extensions and alterations to hotel to provide additional bedrooms and associated facilities including extension to restaurant and spa and gym, demolition of outbuildings, single storey extensions on northern elevation of main building, creation of opening on southern elevation of Quy Mill building and removal of internal walls and fabric to enable alterations and enhancements to Quy Mill and Mill House together with associated car parking provision, landscaping and associated infrastructure	21/04/2023	Refused on 28/07/2023	750m
<b>23/01509/FUL</b>	Vitrum Building St Johns Innovation Park Cowley Road Cambridge, CB4 0WS	Demolition of existing buildings and substructures and the erection of a Research and Development building (use Class E) with basement levels for car and	19/04/2023	Awaiting decision	Adjacent

		cycle parking and building services, and associated landscaping, cycle parking, infrastructure works and plant.			
<b>23/01255/SCRE</b>	Marleigh Phase 3 Land North of Newmarket Road, Cambridge, CB5 8AA	EIA Screening Opinion for up to 150 additional dwellings above the 1,300 dwellings consented under S/2682/13/OL at Marleigh, Land of North of Newmarket Road, as part of the third and final phase of that development.	30/03/2023	EIA Screening Not Required	200m
<b>23/00835/FUL</b>	Merlin Place, 460 Milton Road Cambridge ,CB4 0DP	Demolition of 2,730 sqm (GIA) office building (use class E(g)(i)) and erection of 13,096 sqm (GIA) of research and development accommodation (use class E(g)(ii)), including ancillary accommodation broken down as follows: i. Office accommodation (4,648 sqm) ii. Laboratory space (4,388 sqm) iii. Café (161 sqm) iv. Ground floor car park incorporating 45 no. car parking spaces (1,047 sqm) v. Plant space (924 sqm) vi. Cycle parking spaces (276 for staff and 37 for visitors, total 313) vii. Access and circulation areas, engineering works and footpaths/cycleways viii. Drainage and servicing infrastructure, and ix. Hard and soft landscaping.	01/03/2023	Awaiting decision	Adjacent
<b>22/01632/FUL</b>	Orchard Park Parcels Com4 & L2 Topper Street, Orchard Park, Cambridge	An aparthotel / hotel with the addition of mixed-use facilities, includes the erection of a building above a basement, car parking, landscaping, and other associated works.	05/04/2022	Awaiting decision	1.9km



# ExQ1 Appendix 2

## **S/NEC: North East Cambridge**

### **Hyperlink for all comments**

Open this hyperlink - [Policy S/NEC: North East Cambridge](#) > then go to the sub-heading 'Tell us what you think' > click the magnifying glass symbol

### **Number of Representations for this section**

64 (albeit see note below)

### **Note**

- Some representations included in these summaries of representations tables have been moved from the Cambridge urban area or edge of Cambridge headings as the comments were specific to North East Cambridge. Representations which have been moved in this way are denoted with an asterisk in the following format Representation number\* (Name of respondent).

### **Abbreviations**

- PC= Parish Council      DC= District Council      TC= Town Council

### **Representations Executive Summary**

The majority of comments received were in objection to development at North East Cambridge due to reliance on relocation of the Waste Water Treatment Plant (WWTP) and concerns for the environmental and wellbeing impacts of the relocation of the WWTP to a Green Belt site. Comments raised concern that the relocation of the WWTP was contrary to the protection and enhancement of the Cambridge Green Belt, with the demolition of an operational sewage plant, and relocation causing the destruction of Honey Hill. Concerns for the Development Consent Order (DCO) process were also raised, particularly the deliverability of 4,000 homes being

expected to be built in the plan period, given the dependence on a successful DCO, and viability concerns with potential impact on affordable housing and infrastructure delivery. Comments questioned whether the relocation of the WWTP was a 'requirement' of the plan or not, and due to these concerns thought that the North East Cambridge Area Action Plan and this policy should be reconsidered. Some comments suggested that the Cambridge East site at the existing Marshall airport site, presented a realistic alternative for development on brownfield land.

Other comments were in objection to development at North East Cambridge, for reasons including: unsustainability of the location, lack of green open space provision, concern for over-reliance on existing provision such as Milton Country Park and Wicken Fen. Concerns were raised by The Wildlife Trust, Parish Councils, Cambridge Past, Present & Future, National Trust, Campaign to Protect Rural England, Save Honey Hill Group, Federation of Cambridge Residents' Associations, Cambridge and South Cambridgeshire Green Parties, some developers, and other individuals.

There was particular concern for the high density of the development, and heights that are unprecedented in the Cambridge area. However, Historic England were keen to continue to work alongside GCSP on areas that will need to be addressed, including heights, densities, mass, views, light, treatment of heritage sensitivities, including through recommendations of the Heritage Impact Assessment.

There was some support for the policy, with particular support from Historic England, Gonville & Caius College, Anglian Water Services Ltd, some Parish Councils and a number of developers for the following reasons: delivery in a sustainable location, good accessibility along the transport corridor, the exciting opportunity for regeneration, and delivery of a sustainable neighbourhood.

In addition to these representations, question 4 of the questionnaire was also related to the provision of housing, jobs, facilities and open spaces at North East Cambridge. Many responses voiced similar concerns that appeared in the representations to the policy, particularly in relation to the potential impact upon the environment and biodiversity due to the relocation of the WWTP onto a Green Belt site. Additionally, comments thought that the development should be built at lower density, with affordable homes to accommodate families, and provision of retail and leisure facilities within a 15-minute radius to support the local community without having to travel elsewhere.

## Response to representations

The response to representations relevant to this policy includes:

- **Objections relating to objection to relocation of the Waste Water Treatment Plant:**
  - The impact of the proposed development at North East Cambridge has been carefully considered across a range of issues. The impact of the relocation of the WWTP to an off-site location, including the impact on the Green Belt, the environment and water discharge into the River Cam, will be considered as part of the separate WWTP DCO process being undertaken by Anglian Water. The outcome of the DCO process will inform the Local Plan Sustainability Appraisal in terms of its in-combination effects with other plans and projects, as noted in the Sustainability Appraisal accompanying the First Proposals.
  - Pursuing a medium growth approach to NEC that does not require the relocation of the WWTP would not be achievable in terms of the cost of reconfiguring the existing WWTP, and would not make best use of brownfield land. Allocating the site for a significant amount of employment uses with little or no housing provision would require the Councils to meet our jobs and housing need for the area at alternative, less sustainable, sites, and would also worsen the existing issue of significant amounts of in-commuting into the area.
  - North East Cambridge and Cambridge East are the most sustainable new strategic scale locations available to meet our objectively assessed needs for development; not including development at North East Cambridge would require the Councils to meet our jobs and housing need for the area at alternative, less sustainable, sites.
- **Support for development:** North East Cambridge forms a highly sustainable development option, including being the best performing new strategic scale location available for development within Greater Cambridge in transport terms. In accordance with the NPPF, by promoting the effective use of land on previously development or brownfield land, including supporting the development of under-utilised land and buildings, the proposed policy approach at North East Cambridge seeks to make the best use of land by placing homes, jobs and other supporting services and facilities within the existing urban area of Cambridge.
- **Deliverability challenges:** Information regarding the expected submission of the DCO for the relocation of Cambridge Waste Water Treatment Plant provides confidence that we can expect the full site to be available for redevelopment by the middle of the plan period, enabling significant delivery of jobs and homes by 2041. Infrastructure and viability evidence

supporting the AAP confirm that development at North East Cambridge is viable, robust and that a policy compliant provision of affordable housing as well as necessary infrastructure can be delivered.

- **Concern for impacts:** Representations on this topic are not relevant to the decisions being taken in early 2023 relating to the principle of development at North East Cambridge, but will be taken into account in the preparation of the site allocation policy for inclusion in the full draft plan and a response to those further issues will be provided at that time.

### Table of representations: S/NEC – North East Cambridge

Summary of issues raised in comments	Comments highlighting this issue
<p>General support for the policy, including for the following reasons:</p> <ul style="list-style-type: none"> <li>• Exciting opportunity for regeneration</li> <li>• Highly accessible site</li> <li>• Delivery of homes</li> <li>• Good public and active transport</li> <li>• A sustainable neighbourhood and location</li> <li>• Waterbeach and NEC transport corridor is a focus for growth</li> <li>• This brownfield site is in accordance with the NPPF approach to sustainable development.</li> </ul>	<p>56567 (Croydon PC), 56806 (M Colville), 56864 (Bassingbourn-cum-Kneesworth PC), 59268 (Socius Development Limited on behalf of Railpen), 59603 (Historic England), 59870 (East West Rail), 60114 (C Blakeley), 60150 (U&amp;I PLC and TOWN), 60264 (Gonville &amp; Caius College), 60447 (Anglian Water Services Ltd), 60763 (U+I Group PLC), 58565 (Brockton Everlast)</p>
<p>Development in this location is unsustainable, and therefore the policy is not supported, for the following reasons:</p> <ul style="list-style-type: none"> <li>• the number of new houses already committed in the adopted Local Plans is sufficient to meet objectively assessed need</li> <li>• contrary to climate change policies</li> <li>• contrary to biodiversity and green spaces policies</li> </ul>	<p>59282 (National Trust), 60678 (Cambridge and South Cambridgeshire Green Parties), 57608 (J Pratt), 58115 (M Asplin), 57057 (The Wildlife Trust), 57471 (C Martin), 57649 (Histon &amp; Impington PC), 58295 (Cambridge Past, Present &amp; Future), 58967 (Endurance Estates), 57643* (J Conroy), 57499 (A Martin), 59551 (CPRE), 60190 (J Preston), 59091 (L&amp;Q Estates Limited and Hill Residential Limited) 60698* (The White Family and Pembroke College), (59055 (Axis Land</p>

Summary of issues raised in comments	Comments highlighting this issue
<ul style="list-style-type: none"> <li>• contrary to wellbeing and social inclusion policies</li> <li>• contrary to great places policy, particularly GP/GB: Protection and Enhancement of the Cambridge Green Belt (due to relocation of WWTP)</li> <li>• no operational need to relocate the plant</li> <li>• lack of green infrastructure and open space provision</li> <li>• Site is too high in density</li> <li>• Do not support delivery of homes</li> <li>• Questionable deliverability and viability of homes in the plan period</li> <li>• Concern for relocation of the WWTP and impacts, including on the environment and wellbeing</li> <li>• Concern for DCO process and likely impacts, including on affordable housing delivery.</li> </ul>	Partnerships), 56837 (Save Honey Hill Group), 59900 (Fen Ditton PC), 60239 (Federation of Cambridge Residents' Associations), 60503 (A de Burgh), 56474 (M Starkie), 56478 (P Halford), 57664 (J Conroy), 60036 (T Warnock), 58417 (F Gawthrop), 59159 (M Berkson), 58063 (Horningsea PC), 56469 (A Martin),
<p>Development at the Marshall airfield site should be built up before NEC. Marshall will be vacant by 2030, supposedly the construction of NEC will start in 2028. This would be a better option as at Marshall airfield there is one owner and no existing infrastructure, allowing it to be developed with real green spaces.</p>	58353 (C Lindley), 57499 (A Martin), 56837 (Save Honey Hill Group)
<p>St John's College has welcomed the opportunity to engage throughout this process and looks forward to continuing engagement. It is important that developments that will not prejudice the ambitions of the plan continue to be considered on their own merits whilst the specific policies are evolving.</p>	58891 (St John's College Cambridge)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
<p>The exclusion of a draft allocation for Cambridge Science Park North (CSPN) at this stage is regrettable and it is TCC's view that following a review of both the supporting evidence bases for the JLP and North East Cambridge Action Plan (NECAAP), that neither documents current aims are deliverable without CSPN being allocated.</p>	<p>59269 (Trinity College)</p>
<p>Request that GCLP policy for S/NEC is entirely consistent with NEC AAP. A simple policy that specifies reference to NEC AAP will enable GCLP policy to remain up to date, as and when changes are made through the examination and adoption process.</p>	<p>60150 (U&amp;I PLC and TOWN), 60763 (U+I Group PLC)</p>
<p>GCSPS have taken an inconsistent approach in terms of the scoring of North- East Cambridge site within the HELAA than they have for land adjacent to Rectory Farm. Land at Rectory Farm has been deemed unsuitable on the basis of additional traffic pressure on the A14, however Cambridge North- East, which is both a significantly larger development and closer to the A14 has been deemed suitable on transport grounds. It is therefore unclear, why a different approach appears to have been taken between Cambridge North- East and land at Rectory Farm in this regard, which is not justified or sound in planning terms.</p>	<p>60264 (Gonville &amp; Caius College)</p>
<p>No comment.</p>	<p>58365 (Linton PC)</p>



## S/NEC – North East Cambridge (Relocation of the WWTP / Delivery)

Summary of issues raised in comments	Comments highlighting this issue
<p>Object to the relocation of the WWTP as it is contrary to Policy GP/GB: Protection and Enhancement of the Cambridge Green Belt. Particular reasons include:</p> <ul style="list-style-type: none"> <li>• destruction of Green Belt</li> <li>• impact on open spaces</li> <li>• impact on biodiversity</li> <li>• impact on surrounding SSSI's</li> <li>• loss of valuable farmland</li> <li>• impact on local communities</li> <li>• densification is against GP/GB</li> <li>• unsustainable location, creating a brownfield site</li> <li>• carbon cost of relocating WWTP</li> <li>• destroys buffer between ancient settlements and new developments</li> <li>• Cop26 and the pandemic should change the priority of the move</li> <li>• Destruction of Honey Hill.</li> </ul>	<p>56469 (A Martin), 56474 (M Starkie), 56478 (P Halford), 57471 (C Martin), 57608 (J Pratt), 57664 (J Conroy), 58063 (Horningsea PC), 58115 (M Asplin), 58417 (F Gawthrop), 59159 (M Berkson), 59282 (National Trust), 59591 (CPRE), 59900 (Fen Ditton PC), 60036 (T Warnock), 60239 (Federation of Cambridge Residents' Associations), 60503 (A de Burgh), 60678 (Cambridge and South Cambridgeshire Green Parties) 56837 (Save Honey Hill Group)</p>
<p>Object to parts of the policy. The area is described as a significant brownfield site. This is not correct as it is occupied by commercial buildings. It can only become brownfield if vacated by relocating the Cambridge Wastewater Treatment Plant to Honey Hill. The relocation depends on a successful DCO and therefore this policy cannot come into effect if the application fails. There is no operational need to relocate the plant, that would cost at least £227 million of taxpayers money. Other</p>	<p>56474 (M Starkie), 56478 (P Halford), 57664 (J Conroy), 58417 (F Gawthrop), 59900 (Fen Ditton PC), 60239 (Federation of Cambridge Residents' Associations), 60503 (A de Burgh), 60678 (Cambridge and South Cambridgeshire Green Parties), 56837 (Save Honey Hill Group)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>modern works in UK have been amended or built to minimise their odour and traffic footprint and allow a much smaller buffer zone. A realistic alternative would be to amend the works. Therefore, the North East Cambridge Area Action Plan and this policy should be reconsidered.</p>	
<p>NEC development is predicated on the move of the Waste Water Treatment plant. This was voted for by Councillors without due regard to its possible designation. Anglian Water nominated Honey Hill as the location in the Green Belt.</p>	56469 (A Martin)
<p>The map shown in the plan does not show the destruction of the Green Belt that the WWTP will have.</p>	56469 (A Martin)
<p>There is no mention of the WWTP moving to Green Belt with the GCSP stating to clarify that the relocation of the Cambridge WWTP is not a “requirement” of the North-East Cambridge Area Action Plan. The plan should not be ambiguous. There is a regulatory requirement that the public and all consultees have sufficient information about any significant effects of the Local Plan in order to make a judgement. Horningsea PC believes that Councils are hiding behind the DCO. The public has the right to know why it is being expected to give up Green Belt (high grade agricultural land with important recreational value).</p>	58063 (Horningsea PC), 59900 (Fen Ditton PC), 60239 (Federation of Cambridge Residents’ Associations)
<p>Greater Cambridge is reliant on 8,350 new homes being delivered at North-East Cambridge under Policy S/NEC. This is a significant level of housing to be provided on a brownfield site, part of which is contaminated and comprises a sewage works. There are likely to be significant costs associated with remediating the site and potential time delays on bringing</p>	57155 (Southern & Regional Developments Ltd), 57204 (European Property Ventures – Cambridgeshire), 57321 (Huntingdonshire DC), 60264 (Gonville & Caius College)

Summary of issues raised in comments	Comments highlighting this issue
development forward on the site. It is considered that the Council should look at providing more of a range of smaller and medium sites that have the ability to come forward at a faster rate than strategic sites of this size.	
Careful consideration should be taken to ensure the Councils have additional housing sites to meet housing needs if delivery slows as a result of the relocation of the WWTP. Need to ensure there aren't additional demands on the wider housing market in surrounding areas as a result of under delivery in Greater Cambridgeshire.	57321 (Huntingdonshire DC)
Whilst the approach to the Local Plan and North East Cambridge AAP/DCO is acknowledged, there is a risk that the relocation waste water treatment plant proposals could be delayed, which in turn will influence the remaining stages of the Local Plan process, should the Local Plan continue to be contingent on Anglian Water's DCO. The GCSP should consider accelerating the Local Plan ahead of the DCO if this begins hold up the progress of the Local Plan.	58379 (Marshall Group Properties)
Question the deliverability and viability of 4,000 homes being delivered within the plan period given relocation of WWTP and remediation which will be required as part of any development proposal. In view of the average length of time it takes to achieve a DCO consent and the significant remediation that will be required prior to the construction of housing, we have strong reservations with regards to the draft trajectory.	57337 (HD Planning Ltd), 58967 (Endurance Estates), 59091 (L&Q Estates Limited and Hill Residential Limited), 60264 (Gonville & Caius College), 60297 (Miller Homes – Fulbourn site), 60304 (Miller Homes – Melbourn site)
This allocation may cause the plan to be vulnerable to challenge at Examination stage.	57337 (HD Planning Ltd)

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
<p>Object to the assumed housing trajectory lead in time and build out rates for NEC, as these conflict with those recommended in the Housing Delivery Study and do not provide sufficient time for post-adoption supplementary plans or guidance.</p>	<p>59055 (Axis Land Partnerships)</p>
<p>This site is subject to significant constraints. We consider that the Councils should review both the overall quantum of residential development to be allocated to the NECAAP Area and the ability of the site to deliver within the Local Plan Period to 2041.</p>	<p>58402 (Hill Residential Ltd and Chivers Farms (Hardington) LLP), 58967 (Endurance Estates), 59091 (L&amp;Q Estates Limited and Hill Residential Limited), 60252 (T Orgee)</p>
<p>Anglian Water claim in their submission to the Planning Inspectorate requesting a Scoping Opinion that it is local planning authority pressure for the developments in North East Cambridge which is forcing the move. However, in the Scoping Opinion for the proposed relocation prepared by the Planning Inspectorate, on page 6 of Appendix 2, the Shared Planning Service response states: “We would like to clarify that the relocation of the Cambridge WWTP is not a “requirement” of the North-East Cambridge Area Action Plan and must not be referred to as such. This is because we are not requiring the relocation, but the NEC AAP7 and the emerging joint Local Plan have identified the opportunity that the relocation creates for homes and jobs in the North-East Cambridge area.” So, we can only assume that the North East Area Action Plan can be progressed without the financially and environmentally costly move of the WWTP. This is very welcome news.</p>	<p>59591 (CPRE)</p>
<p>Unsustainable as demolition of an operational sewage plant is not included in the sustainability appraisal.</p>	<p>57471 (C Martin)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>Page 58 of the First Proposals says that an alternative to Policy S/NEC of retaining a consolidated waste water treatment works on its existing site (either as an indoors or outdoors facility) is not considered a “reasonable alternative” as it is not “deliverable or viable”. It is not clear what information has been taken into account when the Councils formed this conclusion and as a result we have not been able to comment on this in any detail. We request further detail is provided to explain the Councils’ decision making in this regard. We also note that Anglian Water’s Initial Options Appraisal reported that it “would be technically feasible to consolidate the existing treatment assets and occupy a smaller area of the existing site” which appear to show that this policy option is possible.</p>	<p>58967 (Endurance Estates), 59159 (M Berkson)</p>
<p>Concerns regarding the viability assumptions behind this site. The First Proposals Viability Appraisal by Aspinall Verdi makes a number of assumptions that we think are not reflective of the real world context in which it will come forward. For example:</p> <ul style="list-style-type: none"> <li>• NEC will be built out by a consortium of housebuilders, whereas it is far more likely a master developer model will be pursued. This has a substantial bearing on scheme viability given no allowance is made for the master-developer profit return. At the very minimum this needs to be tested as a scenario to stress test the assumptions made and ensure a robust approach.</li> <li>• The estimated market revenues require reconsideration. At an average of £452 per square foot these do not appear realistic for a development of this density and</li> </ul>	<p>58967 (Endurance Estates)</p>

Summary of issues raised in comments	Comments highlighting this issue
<p>scale, where market saturation could become an issue. Again, sensitivity testing is required to ensure a robust approach.</p> <ul style="list-style-type: none"> <li>• The market revenues then have a knock-on impact on the affordable revenues, given they are based on the former. As a result, the modelled results show that the plot values of the social rent units are higher than First Homes (which are capped at £250,000 per plot). This does not seem correct and we would ask that more detail is provided around the calculation of affordable values and the evidence to support them.</li> <li>• The appraisal also includes zero S106 contributions, which should be included as a cost within any assessment of this nature. Please could information be provided as to why they are not included, or if they have been, where.</li> </ul> <p>More information and viability evidence is also required in relation to:</p> <ol style="list-style-type: none"> <li>a) How the calculation of the residential coverage at 32,000sqft per net acre has been provided;</li> <li>b) how the included finance costs have been calculated;</li> <li>c) how the infrastructure costs at £30k per plot has been calculated; and</li> <li>d) how the abnormal costs of £1.15m been calculated and how these relate to any funding that the project has been granted.</li> </ol> <p>For a project of this complexity, more detail is needed to understand whether the assumptions are robust.</p>	

<b>Summary of issues raised in comments</b>	<b>Comments highlighting this issue</b>
<p>Redevelopment of this site requires the relocation of the sewage treatment works and businesses. Development is therefore complex and highly likely to have delays and viability issues, resulting in reduction in affordable housing provided.</p>	<p>60698* (The White Family and Pembroke College)</p>
<p>There is no mention in these plans of how relocation of the wastewater plant will address any of the concerns about all the sewage being dumped in the Cam or how Anglian Water proposes to make the River Cam clean and safe for all users.</p>	<p>60239 (Federation of Cambridge Residents' Associations)</p>
<p>The spatial options review supporting the existing Local Plan (2018) identified a medium growth approach to NEC that did not require the relocation of CWWTP. This focused principally on employment, 15,000 jobs with homes in the region of 200 close to the station area and outside of the 500m odour buffer zone. These employment targets without the relocation of CWWTP match those of S/NEC in the First Proposals. It is recommended this option is represented as an alternative policy.</p>	<p>56837 (Save Honey Hill Group)</p>
<p>Cambridge Airport now presents as a realistic alternative for major housing development on brownfield. The site fares well in the Sustainability Assessment and it has good links to employment sites. Furthermore, if careful planning was carried out, the 4,000 housing supply could be obtained by other locations, including the Cam airport, the Bio-medical campus and 1000 areas of Major Change.</p>	<p>56837 (Save Honey Hill Group)</p>
<p>The impact of large population increases in Greater Cambridge as a result of an unprecedented amount of new homes already in the pipeline, 30,000 + amounting to a 37% increase homes already existing in 2020, are yet to be known/tested and will not</p>	<p>56837 (Save Honey Hill Group)</p>



Summary of issues raised in comments	Comments highlighting this issue
<p>be known until mid-plan period and beyond. This high growth strategy may fail if sustainable solutions do not come to the fore in a timely way and the attractiveness of Cambridge for homes and business is eroded. The Aims of the Local Plan: 'Wellbeing &amp; Social inclusion' and 'Great Places' are of particular relevance and at risk here.</p>	
<p>If the vision for North East Cambridge level of densification etc., proves not to be popular and sustainable solutions to support the 31,000 homes already committed and yet to be built are not delivered, these homes, including the promise of affordable homes, may not be built in a timely way or the infrastructure promised realised. If Anglian Water's DCO is successful, long before any of the above are known or review of the impact of the high growth housing targets for Greater Cambridge are realised, relocation will have taken place with significant negative impacts on another area of Greater Cambridge in the Green Belt.</p>	56837 (Save Honey Hill Group)
<p>Omitting discussion of DCO planning process from the Local Plan seems quite extraordinary. Including NECAAP/S/NEC in the Local Plan First Proposals but excluding sufficient or significant information about the effects of the fulfilment of the Policy for effective public consultation at Reg 18 is contrary to the principals and regulations of the SA/SEA and will influence the Consultation and could be construed as effecting bias. This anomaly is further exacerbated given that neither the emerging Local Plan nor NECAAP are dependent on the relocation. If it is regulatory to exclude reference to the site selected for relocation or subjecting the full effect of NECAAP to the SA/SEA</p>	56837 (Save Honey Hill Group)

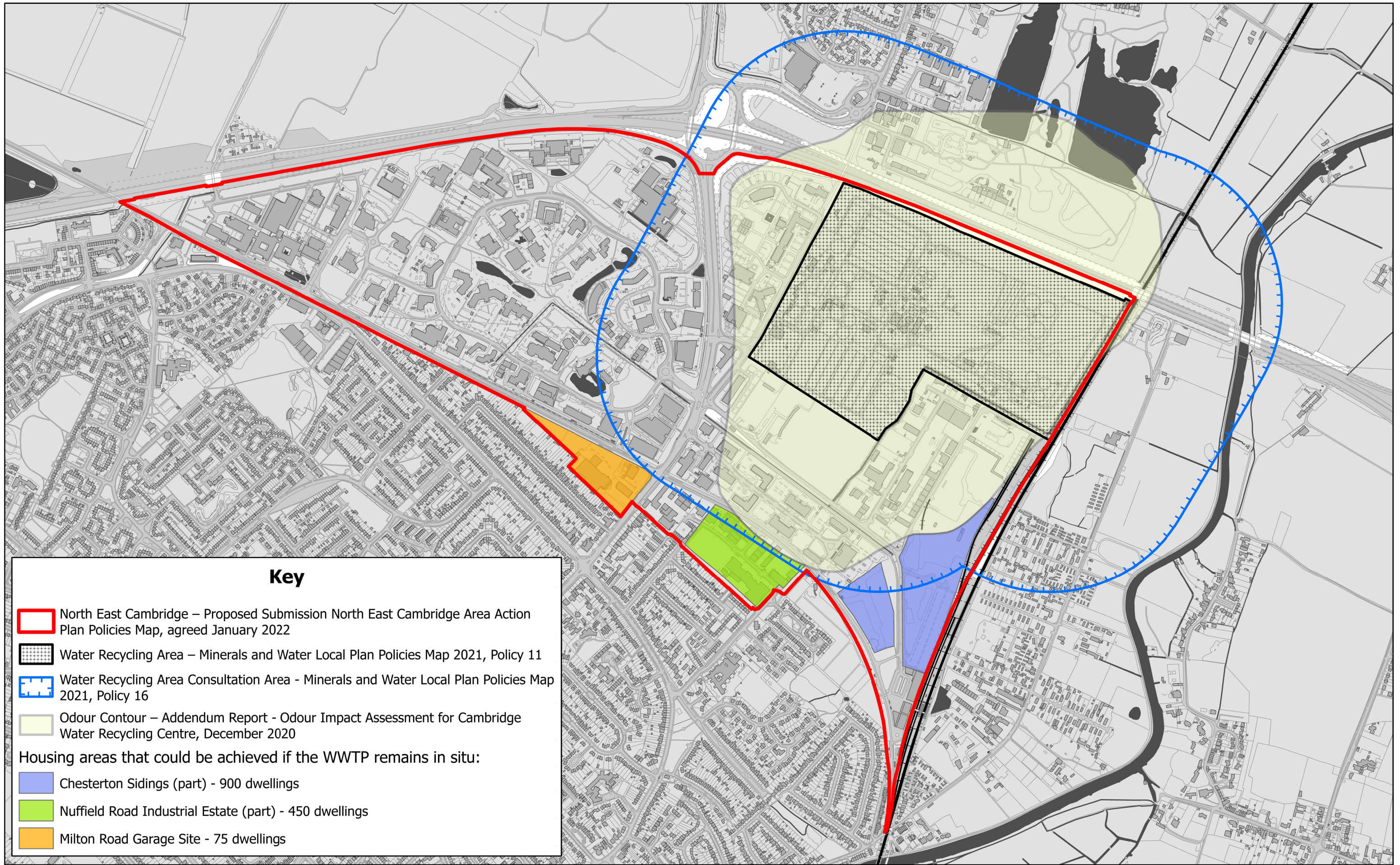
Summary of issues raised in comments	Comments highlighting this issue
<p>within the emerging Local Plan, it is recommended in the interest of an informed and fair public consultation NECAAP is excluded from the Local Plan until after the outcome of the DCO is known and that an alternative is presented in the emerging Local Plan that can be subject to SA/SEA and an informed, evidence based public consultation at Reg 18.</p>	

### S/NEC – North East Cambridge (Climate change)








Summary of issues raised in comments	Comments highlighting this issue
<p>S/NEC Policy is contrary to Policy CC/NZ.</p>	<p>57608 (J Pratt), 58115 (M Asplin) 56837 (Save Honey Hill Group)</p>
<p>S/NEC Policy is contrary to Policy CC/CS</p>	<p>56837 (Save Honey Hill Group)</p>
<p>Discussion with Anglian Water on how they might reduce the environmental footprint and physical area of their existing site could still yield some land for industrial and housing development. The Anglian Water site would form a convenient barrier between new developments and the A14.</p>	<p>59551 (CPRE)</p>
<p>The existing site at Fen Road, Chesterton continues to be a source of ongoing local water quality and environmental health problems due to inadequate foul drainage provision. There have been a number of reports of foul sewage from the site discharging into the River Cam, causing chronic on-going pollution. The relocation of the existing Milton sewage works and extensive redevelopment of North East Cambridge presents the</p>	<p>59720 (Environment Agency)</p>

# ExQ1 Appendix 3





**Key**

-  North East Cambridge – Proposed Submission North East Cambridge Area Action Plan Policies Map, agreed January 2022
-  Water Recycling Area – Minerals and Water Local Plan Policies Map 2021, Policy 11
-  Water Recycling Area Consultation Area - Minerals and Water Local Plan Policies Map 2021, Policy 16
-  Odour Contour – Addendum Report - Odour Impact Assessment for Cambridge Water Recycling Centre, December 2020
- Housing areas that could be achieved if the WWTP remains in situ:
-  Chesterton Sidings (part) - 900 dwellings
-  Nuffield Road Industrial Estate (part) - 450 dwellings
-  Milton Road Garage Site - 75 dwellings



Map 1: What could be achieved in North East Cambridge if the CWWTP remains in situ

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Date:	05 December 2023
Produced by:	PPSE Team
Greater Cambridge Shared Planning	
Scale:	1: 9,000 @ A3



# ExQ1 Appendix 4

Site No.	Location	HA	Use
10.1	Blue Circle Site Coldham=s Lane <sup>1</sup> ;	11.00	B2/B8 D2(e)
10.2	Cambridge Business Park, Milton Road;	6.07	B1(a/b)
10.3	St John=s, Old Milton Road;	0.80	B1(b)
10.4	Barnwell Drive/ Peveler Road;	0.89	B1(c)
10.5	High Cross Research Park, Madingley Road <sup>2</sup>	11.54	B1(b)/ sui- generis Research Institutes
10.6	Gas Works, Cheddars Lane;	1.52	B1(c)/ B8
10.7	Garlic Row;	0.14	B1(c)
10.8	Coldhams Rd;	0.35	B1(c)/
			B2



*The strategy will support new employment in high-technology research and development*

## NEW BUSINESS DEVELOPMENT

### Offices and high-technology research and development

10.51 The growth of high-technology firms in and around Cambridge is now of national if not international significance. After the M4 corridor and Scotland, the Cambridge area is the third highest concentration of high technology employment in the UK. The Cambridge area has however been subjected to development pressures unrelated to its importance as a high technology centre and these pressures are threatening the city=s unique environment and its attractions as a high technology centre. The Local Plan therefore provides for the selective management of growth allowing for the high technology specialities of the area to flourish and other local needs to be met without encouraging a substantial influx of other firms which could equally well locate elsewhere.

10.52 High-technology research and development uses, (see glossary) within use class B1(b) are to be encouraged only where it can be demonstrated that proposals do not come within the terms of Cambridgeshire Structure Plan (1989) Policy P6/8 and there is a special need for a Cambridge location. This will be judged in terms of factors such as the level of interaction with and need for proximity to Cambridge University and other research facilities in the area. Factors taken into account might include

#### Footnotes to Policy ET1

1. The site presents a number of constraints on development, including environmental requirements. The net developable area will be less than 11 ha.
2. 1.3ha of this site is designated as a CWS the development of which should accord with Policy NE12. The allocation is principally for commercial B1(b) uses, but may also include Research Institutes and other ancillary uses, including B1(a) office uses where appropriate to the Research Park. The development of the site will be regulated by way of conditions or, if appropriate, planning obligations, to limit its use to B1(b) research and development uses, research institutes permitted under Policy ET10, and other ancillary uses appropriate to the Research Park (see paragraph 10.103 below). The Local Plan also allows for Research Institutes to be potentially developed within other sites allocated for development by Cambridge University within the West Cambridge area, see Higher & Further Education chapter, paragraph 9.38.