

# South Cambridgeshire District Council

## Comments on Anglian Water's Response to the Local Impact Report

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

**Deadline 3**

18 December 2023



## Comments on responses to the LIR by the Applicant

This document sets out South Cambridgeshire District Council's (SCDC) comments on Anglian Water's response [REP2-036] to the SCDC Local Impact Report (LIR) [REP1-139] superseded by [REP2-052]

### Anglian Water [Applicant] – [REP2-036]

AW Ref.	SCDC LIR Topic	Comment
4.	Planning Policy	SCDC has no further comments to make in respect of the planning policy but reserve the right to comment further should matters referred to in this section be changed or updated.
6.	Strategic Development Plan Context	SCDC has no further comments to make in respect of the Strategic Development Plan Context but reserve the right to comment further should matters referred to in this section be changed or updated.
7.	Green Belt	SCDC notes the Applicant's comments in respect of what form of development within the Green Belt may be considered not to be inappropriate development under the NPPF. SCDC maintains its view as set out in Section 7 of SCDC LIR [REP1-139] superseded by [REP2-052].
8.	Landscape	The Council has no further comments to make at this stage but reserve the right to provide further comment after Deadline 3 should further clarification be required.
9.	Historic environment	The Council has no further comments to make at this stage but reserve the right to provide further comment after Deadline 3 should further clarification be required.
10.	Carbon	SCDC acknowledges that it is difficult to quantify carbon impact when there are still a number of assumptions to be made in respect of construction carbon and possible outcomes for the project. As the Applicant's response notes, draft requirements 21 (Carbon management plan) and 7 (Detailed Design) would address some of these uncertainties as the scheme progresses to detailed

		<p>design stage. Notwithstanding this, a reporting mechanism (by way of a DCO requirement) should be in place as part of the DCO.</p> <p>SCDC seeks further clarity in respect of capital replacements and their exclusion from the carbon figures. It is acknowledged that these are not regular, annual emissions, but if they have been captured in the tables referenced, then it is unclear why they would not be included [Table 2-20 and 2-21 of Appendix 10.1 GHG Calculations [APP-109].</p>
11.	Ecology and Biodiversity	<p>SCDC acknowledges that in terms of BNG requirements, a S106 planning obligation will be required where the land used to provide the BNG offset is outside the order limits of the DCO. The S106 will be between the Landowner and the responsible body i.e. Cambridge County Council. BNG can only be secured through condition where it is provided within the order limits of the DCO, or where the Applicant is purchasing BNG credits from a third-party provider. However, SCDC recommends that the S106 with that third party provider should secure a 30-year management and monitoring plan.</p>
12.	Land Contamination	<p>SCDC has no further comments to make in respect of land contamination but reserve the right to comment further should matters referred to in this section be changed or updated.</p>
13.	Odour	<p>SCDC notes the Applicant's stance / reasoning that they have conservatively modelled odour however SCDC still consider climate change impacts may affect odour influent.</p>
14.	Air quality impacts	<p>SCDC has no further comments to make in respect of air quality but reserve the right to comment further should matters referred to in this section be changed or updated.</p>
15.	Noise and vibration	<p>SCDC welcomes the update on noise and vibration, SCDC does however note that it appears the Applicant is no longer looking for dual regulation e.g., CEMP &amp; S.61 of the Control of Pollution Act 1974 and instead the potential impact of the site whilst being developed will be through CEMP only. SCDC is satisfied with this approach.</p>
16.	Lighting	<p>SCDC has no further comments to make in respect of lighting but reserve the right to comment further should matters referred to in this section be changed or updated.</p>

<b>17.</b>	Public Health	SCDC notes the Applicant's comments in respect of local jobs for local people [REP2-036]. It is not clear why links have been made with Wisbech College on training and skills as this college is less connected to the area and would involve greater distances to travel which would increase carbon footprint. This needs to be clarified in SCDC's view. It is not clear why such links have not been made to the Cambridge Regional College. SCDC would expect to see linkages with all suitable local training institutions to enable more sustainable connections.
<b>18.</b>	Community impact	SCDC has no further comments to make in respect of community impact but reserve the right to comment further should matters referred to in this section be changed or updated.
<b>19.</b>	Public Rights of Way	SCDC has no further comments to make in respect of public rights of way but reserve the right to comment further should matters referred to in this section be changed or updated.
<b>20.</b>	Highways and Transportation	SCDC has no further comments to make in respect of highways and transportation but reserve the right to comment further should matters referred to in this section be changed or updated.
<b>21.</b>	Climate Resilience	SCDC has no further comments to make in respect of climate resilience but reserve the right to comment further should matters referred to in this section be changed or updated.

# South Cambridgeshire District Council

## Comments on Save Honey Hill's Response to the South Cambridgeshire District Council Local Impact Report

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**Deadline 3**

18 December 2023



## Comments on responses to the LIR by the SHH

This document sets out the South Cambridgeshire District Council's (SCDC) comments on Save Honey Hill's response [REP2-066] to the SCDC Local Impact Report (LIR) [REP1-139] superseded by [REP2-052].

### Save Honey Hill (SHH) – [REP2-066]

#### Summary of SHH Response to Chapter 6 of the SCDC's LIR and Council's response

SCDC LIR Para Ref	LIR Para Extract	SHH's Response in SSH Rep2-066)	SCDC Comment
6.27	The adopted plans say that "Exploration of the viability and feasibility of redevelopment of the Cambridge Water Recycling Centre within Cambridge City to provide a new treatment works facility either elsewhere or on the current site subject to its scale will be undertaken as part of the feasibility investigations in drawing up the AAP" [see South Cambridgeshire Local Plan, paragraph 3.34 - <b>Appendix 1, GCSP-1</b> - and Cambridge Local Plan, paragraph 3.35 - <b>Appendix 1, GCSP-3</b> ]. The adopted Local Plans make no reliance upon any employment development or residential development arising	The final sentence does not explain the failure to undertake the promised feasibility studies set out in paras 3.34/3.35 of the adopted local plans.	Please see response to Question 2.14 Part (c) – responses to ExA's Written Question EQ1 [REP2-054].

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	<p>out of the allocation in order to meet housing and employment plan requirements up to 2031. This reflects the position that there was no evidence available to the Councils that there was a reasonable prospect of delivery on the site that required relocation of the CWWTP and the persistence of the odour constraint impacting surrounding land.</p>		
6.28	<p>The HIF funding award was, as highlighted, a fundamental 'game changer' as it re-envisioned the future planning context of the last remaining strategic scale brownfield site in the Cambridge urban area. It did so by providing a solution to the viability constraint or block on the release of the existing CWWTP site to allow for redevelopment. The Councils in their roles as local planning authorities have determined the appropriate policy framework for the area through preparation of the draft North East Cambridge Area Action Plan and, more recently, the emerging Greater Cambridge Local Plan as discussed in the sections below.</p>	<p>The HIF grant approval is not a 're-envisioning' since that is not a matter for the Government as grant giver. Any visions or plans for development must be brought forward through properly tested Local Plan documents.</p>	<p>The existing vision is set out in the adopted 2018 Local Plans [see South Cambridgeshire Local Plan, Policy SS4 &amp; paragraphs 3.29 – 3.35 <b>Appendix 1, GCSP-1 of the SCDC LIR [REP2-052]</b>. - and Cambridge Local Plan, Policy 15 paragraphs 3.30 – 3.36 - 35 [<b>Appendix 1, GCSP-3 of the SCDC LIR [REP2-052]</b>], which highlight the constraints imposed by the existing CWWTP, the aggregates railhead, and Veolia's waste management facility. The potential for the CWWTP to be relocated has enabled the Councils to consider an alternative shared future vision for the</p>

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			area and to set this out in the proposed NECAAP 35 <b>[[Appendix 1, GCSP-7 of the SCDC LIR [REP2-052].</b>
6.33	<p>Policy 1 of the NECAAP <b>[Appendix 1, GCSP-7]</b>, includes the following overarching allocation as follows:</p> <ul style="list-style-type: none"> <li>The Councils will work to secure the comprehensive regeneration of North East Cambridge in particular the creation of a new high quality mixed-use city district, providing approximately 8,350 new homes, 15,000 new jobs, and new physical, social and environmental infrastructure that meets the needs of new and existing residents and workers as well as delivering tangible benefits for surrounding communities.</li> </ul>	<p>Employment generation in the order of 15,000 jobs is not dependent on a relocation of the WWTP. These employment growth targets with a mixed-use development, including homes in the area of the new Station, were identified without the relocation of the WWTP in Cambridge Northern Fringe East Area (CNFE) Issues and Options Report (2014) Chapter 8 pg. 36 &amp; 37. The CNFE boundary did not include the large northern section now in NECAAP. It is likely that employment targets way in excess of 15,000 can be attained without the relocation of the WWTP within a mixed-use city district with lower housing targets. SHH also notes and has responded to the SCDC ExQ1 Response 7.35 in SHH18</p>	<p>The reference to the 2014 Issues and Options report<sup>i</sup> pre-dates the NECAAP Transport Study<sup>ii</sup>, which highlights the fact that the surrounding road network is at capacity and recommends the use of a trip budget as the only sustainable means by which to enable any further development within the NEC area to come forward. The transport evidence is clear that employment uses are the significant contributor to trip generation. This is reflected in the level of employment floorspace provided for through the proposed NECAAP. However, even these levels of employment uplift for the eastern side of Milton Road are contingent upon the reduction in trips from redevelopment of the western side of Milton Road. Without relocation</p>



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			<p>of the CWWTP the development quantum to be achieved east of Milton Road is unlikely to fund the substantial cost of the sustainable transport interventions required to facilitate the transfer of existing trips from the Science Park. Without this, the development capacity east of Milton Road will likely remain very limited. Further, if the CWWTP was to remain in situ, it will not provide the high-quality environment needed to support a higher quantum of commercial floorspace.</p>
6.34 & final sentence of 6.36	<p>Para 6.36 final sentence "The NECAAP process has therefore advanced as far as it can at this point and has been paused until such time as the DCO process is concluded."</p>	<p>This analysis is based on what can be described as a very cautious, 'can't do', attitude towards accepting the feasibility of residential development in the NECAAP area, based on the 'worst case' odour modelling in the 2018 Odournet report. The ExA should ask the Applicant and both local authorities for a mapped analysis of odour incidents and complaints recorded in,</p>	<p>Paragraph 6.34 was updated to take account of the latest odour modelling in the revised version of the LIR at Deadline 1 <b>[REP1-139]</b> superseded by <b>[REP2-052]</b>.</p>

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		<p>say 2012 and 2022, with a related commentary on the extent of the existing residential uses and the 'nuisance' ratings applied by Odournet. There has been a locally perceived measurable reduction in odour from the works over this period, which should be recorded in this data. In particular, SHH believe that there is no compelling evidence to seek to prevent redevelopment of either the Trinity Hall or Nuffield Road Industrial Estates for residential use, nor for any restrictions on the majority of the Cambridge North Station 'gateway site'. As already demonstrated in recent applications, there are no constraints on life sciences or other office development and a substantial appetite among landowners for pursuing these. Targeted improvements to odour emissions and consolidation could release far more land to the north and east of Cowley Road for high-quality mixed-use development.</p>	

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6.35	Two land parcels and 250 dwellings lying outside the odour contours	This conflicts with the GCLP DS 2021 pg.83 housing delivery tables showing 650 homes of the 3,900 for delivery at North East Cambridge (NEC) in the GCLP plan period prior to 2030 and thus ahead of any WWTP relocation. It is assumed the 650 homes relate to current planning applications relating to Chesterton Sidings and others described as independent of a relocation of the WWTP referenced in the GCLP DS pg.101. See also SHH Comments on SCDC LIR, REP1-139 para 6.99 below.	See LIR paragraph 6.89 <b>[REP1-139]</b> which confirms some early delivery at Chesterton Sidings has been assumed to date and that the assumptions underpinning the trajectory will be kept under review as the plan progresses. See also the revised LIR <b>[REP2-052]</b> which amends the figure for the number of dwellings that could potentially come forward with the CWWTP in situ. However, it should be noted that the Brookgate application, currently subject to an appeal <b>[APP/W0530/W/23/3315611]</b> is for only 425 residential dwellings, not 650. The NEC trajectory will be reviewed before taking the AAP or GCLP forward to take account of any material changes in circumstances.
6.44	The same developer has also acquired the site directly opposite on the eastern side of Milton Road, known as Trinity Hall Farm Industrial Estate (shown as Plot I on Figure 6 of the NECAAP <b>[Appendix 1, GCSP-7]</b> ). This site is	Given the location of this site and its access, there are good reasons to permit the redevelopment of the Trinity Hall Industrial Estate for principally	Reference should be made to the last sentence, paragraph 6.44 of the LIR <b>[REP1-139]</b> now superseded by <b>[REP2-052]</b> which clarifies that the landowner of Trinity Hall Farm wishes

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	<p>proposed to be retained for employment uses, with both the landowner and Councils seeking intensification of commercial floorspace through redevelopment.</p>	<p>residential and related community uses.</p>	<p>to retain the site in commercial use only. This is why the site is not promoted for mixed-use within the proposed NECAAP, as there is no evidence that such a proposal would be deliverable.</p>
6.73	<p>Given the uncertainty over water supply, and also evidence indicating that it may or may not be possible to deliver the increased needs in full depending on market absorption rates and the preferred strategy, it is not possible at this point to set a definitive housing target for the new Local Plan and therefore it would be premature to identify any additional sites that may or may not be necessary to meet the increased need, or indeed to take account of any sites included in the First Proposals that may not be able to come forward, including North East Cambridge were the DCO not to be approved.</p>	<p>This is an important statement regarding the uncertainty that exists in relation to the housing requirements and strategic locations to be brought forward in the GCLP and hence the weight that can be attached to that plan's First Proposals.</p>	<p>It is important to read paragraph 6.73 of the LIR <b>[REP2-052]</b> together with paragraphs 6.74 to 6.77. Paragraph 6.74 in particular states "<i>However, what we do understand already is that once the reservoir is operational from around the mid-2030s there will be substantial water supply available. The process for bringing forward the new Fens Reservoir is already progressing and given the significance of the proposal to the future water security of the Region, there is considered to be a reasonable prospect that it will be delivered and therefore we can be confident that whatever decision is made for the plan period as a whole, we will be able to plan for further</i></p>

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			<p><i>development being completed from the opening of the reservoir in 2035-37. It is the interim period that remains uncertain at this point, although it is expected that the proposed water transfer measures will increase supply from around 2032.”</i> Further the Development Strategy Update <b>[Appendix 1 GCSP - 38 &amp; GCSP- 39 of the SCDC LIR [REP2-052]</b> confirms NEC as one of 3 key sites for form part of any development strategy for the new local plan, subject to the outcome of the DCO process.</p>
6.79 to 6.81		<p>SHH REP1-171 at 6.6 has demonstrated that there is sufficient capacity in the GCLP amongst new and existing strategic sites including a substantial amount with permission to accommodate the homes specified in NECAAP without requiring an additional new strategic site and/or use of greenfield or Green Belt above those already in the plan or proposed</p>	<p>SCDC LIR <b>[REP2-052]</b> explains the delivery rates that are considered realistic to inform the housing trajectory (see paragraphs 6.84 to 6.89). These are higher than has been assumed in the adopted 2018 Local Plans where 250 dwellings per annum was the accepted average rate. There is no evidence to support the claim of 5000 homes at the Cambridge</p>

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		<p>in the First Proposals. As outlined in SHH REP1-171, existing larger strategic sites are identified in the GCP Development Strategy Report as of similar sustainability to NECAAP founded on the intention that these larger sites will incorporate integrated transport infrastructure / transport corridors. As examples, the proposed new strategic site of Cambridge Airport (capacity 7,000 homes) and existing new strategic site at Waterbeach (capacity 11,000 homes) are close enough to North East Cambridge and Cambridge Science Park for active non-motorised travel and both will be connected to the Cambridge network of cycleways. Waterbeach already has high frequency park and ride bus services linking the two locations. Cambridge Airport will be linked by segregated bus and cycle links to all key locations in the City. The Strategic sites at Waterbeach , Cambourne (capacity up to 10,000 homes) and</p>	<p>Biomedical Campus as part of the new Local Plan as noted previously in the Council's response to the Save Honey Hill Written Representations para P.65 [REP2-051]. The Housing Delivery <b>Study [Appendix 1 GCSP28 &amp; GCSP29 of the SCDC LIR [REP2-052]</b> recommends increasing the average annual figures to 350 for sites within or on the edge of Cambridge having regard to actual delivery rates in the area, but to assume faster delivery and much higher delivery figures within the plan period on other strategic sites instead of delivery at NEC would be inconsistent with the evidence and place the Councils (SCDC and the City Council) at significant risk that the plan would be found unsound and that housing needs would not be met. The position remains that NEC is the most sustainable location in Greater Cambridge to meet needs for jobs and homes and should come forward for</p>

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		<p>Cambridge Bio-Medical Campus (capacity up to 5,000 homes) will all have rail links to Cambridge North Station at North East Cambridge and thus, Cambridge Science Park, as well as segregated bus links to all key locations in the City. The statement made in the second bullet of SCDC LIR, REP1-139 at 6.80 represents a very short term and incremental view at odds with the Government's aspirations for the Cambridge area in Cambridge 2040. Further substantial growth will have to contemplate, at the least, several new settlements eg to the south and east of Cambridge as well as active dispersal of growth into the market towns around Cambridge.</p>	<p>development, subject to the DCO being granted.</p>
6.84		<p>The ExA should note this important caveat.</p>	<p>It is unclear to SCDC what 'important caveat' SHH is referring to in paragraph 6.84 of the SCDC LIR <b>[REP2-052]</b>, which addresses the approach to build out rates for confirming the housing trajectory within</p>

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			the emerging Local Plan. If it is referring to the final sentence that delivery rates could be higher, please see response in relation to paragraphs 6.79 to 6.81 above.
6.106	It is also important to be clear that there is also a close interdependence with the HIF. SCDC is not part of any contract or agreement with Homes England and is not privy to the details. SCDC understands the grant to be contingent upon the DCO being granted and housing being delivered on the CWWTP site. The HIF is however, fundamental in that it is the only means by which the viability constraint that has prohibited regeneration for over 20 years is capable of being overcome.	SHH position is that HIF is not essential to secure viable high-quality development of underused land at North East Cambridge. This can be funded via development returns.	SCDC does not agree with this suggestion not that it can be validly made. SCDC would direct the ExA to the LIR paragraph 6.4 to 6.24 <b>[REP2-052]</b> which sets out the long planning history and the viability constraints that have stopped regeneration taking place over the past decades. If it could have been funded by development returns as suggested, then this would have been identified by now.
6.111 and 6.112	Greater Cambridge has a strong and nationally important economy. It is recognised as one of the most important research and innovation-led employment hubs for the UK. The evidence supporting the emerging GCLP concludes that the economy is forecast to continue growing strongly and that housing need to support the	The employment generation opportunities at North East Cambridge and the additional significant contribution it could make to the local Cambridge and national economy is not primarily dependent on a relocation of the CWWTP. High quality	SCDC does not agree this assumption can be made and would direct the ExA to the Proposed Submission NECAAP [Appendix 1 GCSP7] and the spatial framework supporting the development quantum proposed in the NECAAP and emerging GCLP 35 <b>Appendix 1</b>



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	economy is well above the government minimum standard method.	employment floorspace is already becoming available to the east of Milton Road in close proximity to the existing and potentially intensified Cambridge Science Park.	<b>GCSP- 6 of the SCDC LIR [REP2-052]</b> . This was which a predicated on the relocation of the WWTP taking place. With respect to the quantum of employment floorspace that could be supported, please see the response to paragraph 6.33 above.
6.112	The NECAAP and its supporting evidence demonstrate the significant development potential of the site. The provision of 8,350 net additional homes would make a substantial contribution towards meeting Greater Cambridge's housing needs to 2041 and well beyond and would support the continue economic growth of the area and Greater Cambridge. The location of the existing CWWTP and surrounding area is in a key strategic location adjacent to Cambridge Science Park, a leading location for the technology sector, one of the key sectors in the Cambridge economy. It is also particularly well served by public transport and active transport infrastructure. It provides the opportunity to create high quality, attractive links between the Science Park and the Cambridge North Station	SHH does not agree that the homes proposed at NEC within the plan period will make a significant contribution to the housing requirement to 2041. As presented in SHH REP1-171 at 6.6.4, the 3,250 homes dependent on WWTP allocated for build out at NEC within the GCLP plan period to 2041 represents only 7% of the housing requirement agreed and identified as deliverable in Greater Cambridge. Further, it is evident that existing and proposed strategic sites, absent NECAAP, will provide a large pool of sites, in excess of 15,000 for build out post 2041, of which 9,688 are already allocated with permissions and could accommodate any additional	It is relevant to note that there is already a housing supply of 37,200 dwellings as a result of the current 2018 Local Plans allocations and planning permissions (GCLP First Proposals, Policy S/DS, table on page 32). The balance that needs to be found in the First Proposals on additional sites or through densification is 11,596 dwellings. The 3,900 dwellings at NEC is therefore 33.6% of the <u>additional</u> housing being provided through the GCLP First Proposals. With respect to the rate of housing delivery please see the Council's response to Paragraphs 6.79 – 6.81.

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	and maximise the benefits of the new station, which was intended to be a catalyst for regeneration of this highly sustainable location, but the benefits of improved accessibility have yet to be fully realised given the continued presence of the CWWTP.	housing anticipated at NECAAP pre and post 2041.	
6.115	Indeed, in respect of North East Cambridge, the statement says that: "Cambridge City Council, Anglian Water, Land Securities PLC and Homes England will work together to accelerate the relocation of water treatment works in Northeast Cambridge (subject to planning permission), unlocking an entire new City quarter – delivering approaching 6,000 sustainable well-designed homes in thriving neighbourhoods – as well as schools, parks and over 1 million square feet of much needed commercial life science research space."	A mixed development including 'over 1 million square feet of much needed commercial life science research space' is not dependent on a relocation of the WWTP.	SCDC would refer to the full wording in paragraph 6.115 of its LIR <b>[REP2-052]</b> which provides the fuller nature of the mixed development proposed for the area, SCDC does not agree SHH assumption that the level and quality of the commercial floorspace proposed by the NECAAP could still be achieved without relocation of the WWTP. Please see the response to paragraph 6.33 above which further explains why SHH's assumption is not well founded.

<sup>i</sup> Cambridge Northern Fringe East Area Action Plan – Issues and Options Report. December 2014 [cnfe-issues-and-options-report-2014.pdf](http://greatercambridgeplanning.org/cnfe-issues-and-options-report-2014.pdf) ([greatercambridgeplanning.org](http://greatercambridgeplanning.org))

<sup>ii</sup> North East Cambridge Area Action Plan Transport Evidence Base 29 September 2019 [NECAAPEBTransportEvidenceBase2020v12021.pdf](http://greatercambridgeplanning.org/NECAAPEBTransportEvidenceBase2020v12021.pdf) ([greatercambridgeplanning.org](http://greatercambridgeplanning.org))