

South Cambridgeshire District Council

Written summary of oral submissions made at Issue Specific Hearing 3 (ISH 3) and responses to the Action Points raised.

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

Deadline 4

22 January 2024



This document sets out South Cambridgeshire District Council’s (SCDC) written summary of oral submissions made at Specific Hearing 3 (ISH 3) on the 10th and 11th January 2024 and responses to the Action Points raised at these hearings.

This table refers to the agenda published 21 December 2023 [EV-007a] and the Action Points published 17 January 2024 [EV-008v].

Please note that although ISH3 Agenda points 10 (noise and vibration) and 12 (odour) [EV-007a], were not discussed at the hearings, for completeness, SCDC have responded to these matters in the table below. For clarity, these topics are marked with an asterisk.

AGENDA REF	ACTION POINT REF	TOPIC AND QUESTIONS	SCDC RESPONSE
2	-	<p>APPLICATION DOCUMENTS</p> <p>a. Whether Cambridge City Council (CCC) / South Cambridgeshire District Council (SCDC) intend(ed) to submit written summaries of oral submissions.</p> <p>b. Applicant’s post hearing submission Appendix C – Working Timetable commissioning / remediation dates clarification.</p>	<p>a. Yes, SCDC will submit written summaries of oral submissions.</p> <p>b. N/A</p>

4	-	<p>CARBON</p> <ul style="list-style-type: none"> a. South Cambridgeshire Local Plan (SCLP) policy CC/3 compliance and BREEAM. b. Carbon assessment, including: <ul style="list-style-type: none"> i. Baseline of the carbon assessment. ii. Consideration of sludge deliveries. iii. Uncertainty of future emissions and scenarios. iv. Waste disposal. c. Whole life carbon assessment, including: <ul style="list-style-type: none"> i. Scope. ii. Potential for future expansion and upgrades to plant equipment. iii. Offsetting of decommissioning and construction greenhouse gas (GHG) emissions. iv. Net zero and carbon offsetting. d. Significance of effects. e. Design refinement and GHG emissions. f. Gas to grid capability and alternatives. 	<ul style="list-style-type: none"> a. Local Plan policy compliance - The commitment to achieve Net Zero operational emissions, along with the installation of a 5.6MWp solar PV array on site (providing 19% of the sites power demand), should ensure compliance with SCDC Local Plan policy CC/3. The Gateway Building will be constructed to achieve BREEAM 'Excellent' but reassurance is sought that any other non-domestic building (over 1,000m2) will be constructed to the same standards. b. Carbon assessment - supportive of the reasoning and need for the DM0 baseline which demonstrates redevelopment of existing WWTP to allow comparisons between realistic outcomes, but SCDC recognise that the inclusion of a current 'business as usual' baseline (as per discussions with the Applicant and Cambridgeshire County Council) will allow for more accurate capture of the overall carbon implications of the scheme. c. Whole life carbon assessment means dealing with multiple assumptions and uncertainties (timescales/process of updating Operational Carbon Management Plan) – SCDC is seeking reassurance as to how the carbon data is updated and refined to reflect development decisions, gaps
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			<p>in data and improvement in data accuracy as the scheme progresses, e.g.,</p> <ul style="list-style-type: none"> - Gas to grid Vs CHP - Impacts of decarbonisation of grid - Process emissions - Future expansion & capital replacements
5	-	<p>ECOLOGY</p> <p>a. Landscape, Ecological and Recreational Management Plan (LERMP), including:</p> <ol style="list-style-type: none"> i. Recreational impacts on Stow-cum-Quy Fen Site of Special Scientific Interest. ii. Wider connectivity (Wicken Fen Vision Area and compliance with SCLP policy NH/6). iii. Funding towards organisation of an Advisory Group. iv. Scope / species mitigation. <p>b. Securing mitigation through the Code of Construction Practice (CoCP) Parts A and B and the Construction and Environmental Management Plan, including:</p> <ol style="list-style-type: none"> i. Habitat reinstatement and species mitigation. ii. Invasive non-native species. iii. Trees and hedgerows. <p>c. Biodiversity Net Gain (BNG), including:</p>	<p>a. The LERMP is to be considered by Natural England and Cambridgeshire County Council. SCDC Ecology Officers have discussed the matter with the Cambridgeshire County Council Ecology Officer and agree with their position.</p> <p>b. Protected and invasive species mitigation as outlined within the Code of Construction Practice is very generic and does not deal with the specific threats posed to or from these species. For example, aquatic invasive species such as Himalayan balsam, requires careful and sometimes bespoke strategies to remove the risk of further increasing the range of such species. Increasing the range of such species would conflict with the provisions set out within the Wildlife and Countryside Act 1981 (as amended) and may incur a criminal prosecution. The issue has however been discussed with the Applicant</p>

		<ul style="list-style-type: none"> i. Scope (consideration of areas outside of the LEMRP and outfall management and monitoring plan). ii. Reedbed habitat. iii. Funding for ecological monitoring requested by SCDC / section (s) 106. iv. Achieving the proposed 20% BNG. <ul style="list-style-type: none"> • Operational outfall management plan / design of the outfall. • Impacts on the River Cam County Wildlife Site (CWS). • Impacts on Low Fen Drove Way Grasslands and Hedges CWS. • Impacts on protected species (bats, reptiles, hares). 	<p>and SCDC believe adequate provision can be secured through Requirements.</p> <p>c. Although the DCO is not currently subject to mandatory Biodiversity Net Gain (BNG), the Applicant has agreed that they will provide 20% BNG. Area and linier BNG both exceed this aim which is welcomed. However, river habitat units only reach a 2% net gain with trading issues unresolved. The Applicant believes there is no scope to provide habitats with the required distinctiveness scores within the order limits of the application; therefore, an offsite solution must be found. Currently, there are no local solutions, therefore, the Applicant and Ecology Officers have agreed that a “prior to the commencement of works” requirement should be secured to provide such detail prior to any works being undertaken at the outfall site. The exact mechanism (S106 or Conservation Covenant) for securing any offsite BNG must be discussed in good time and agreed by all parties.</p> <p>Details regarding potential riverbed scour during flood events have not been submitted as yet and is a concern as excessive scour can impact both aquatic and riverbank habitats.</p> <p>Detailed mitigation strategies will be required for potential translocation of reptiles in the Waterbeach area to remove the risk of double</p>
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			<p>handling in association with the large development. (Secured through Requirements) Further analysis of the potential impact to commuting bats on the Horningsea Road from new lighting. These are matters that will be discussed further with the Applicant and addressed through the Statement of Common Ground (SoCG).</p>
7		<p>HISTORIC ENVIRONMENT (Agenda)</p> <ul style="list-style-type: none"> a. Clarification around effects on designated heritage assets, including Baits Bite Lock Conservation Area and Biggin Abbey Grade II* listed building. b. Consideration of the degree of harm to the significance of designated heritage assets. c. Consideration of harm to the significance of designated heritage assets not reported in ES Chapter 13. d. Adequacy of mitigation. 	<ul style="list-style-type: none"> a. SCDC have considered the assessment of harm identified within the Chapter 13 of the ES (Historic Environment) [AS-030] and within the Local Impact Report (LIR) [REP2-052] focussed on Baits Bite Lock Conservation area, Biggin Abbey and Poplar Hall where there is disagreement between the Applicant and the Council over the level of harm identified. b. The degree of harm is identified within Historic Environment Chapter of the ES [AS-030]. The Assessment of Effects is explained in Chapter 4 of the ES chapter 13. In para 4.2.49 the significance of effect of the permanent construction of the WWTP on Baits Bite Lock are identified as a permanent slight adverse effect. In answer to Action Point 90 the District Council considers this level of effect of the constriction of the outfall and changes in the setting of the conservation area

			<p>that this results in is a moderate adverse impact which is significant. The LIR has now been updated as part of the Deadline 4 submission to clarify the District Council's position at paragraph 9.25.</p> <p>c. ES chapter 13 [AS-030] has identified that there will be a permanent impact on Biggin Abbey resulting from the changes within its setting. The level of impact has been assessed as a permanent minor adverse impact. The District Council considers that the impact of the proposed development on this asset of High value should be identified as a permanent moderate or large adverse impact.</p> <p>Paragraph 9.37 of the LIR [REP2-052] should read moderate adverse effect as opposed to minor/moderate adverse effect. This too has been amended as part of the Deadline 4 submission.</p> <p>In its overall assessment of harm, the Applicant concludes that the proposed development will cause less than substantial harm and with the application of primary, secondary and tertiary mitigation that this harm will be at the lower end of less than substantial harm. The Council agrees with the assessment of less than substantial harm to the significance of all assets that have been assessed but considers the level of harm, identified through the Applicant's assessment of the</p>
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			<p>Heritage Assets, to be at the higher end of less than substantial harm.</p> <p>The District Council was consulted on which heritage assets to include in the assessment at the pre-application stage and does not consider there to be any heritage assets which have not been reported in the ES and its appendices.</p> <p>d. The mitigation proposed by the Applicant during construction includes the use of temporary construction hoardings for Baits Bite Lock. SCDC has identified that these hoardings could also have an adverse impact on the setting of the heritage asset during this period and a detailed strategy has been requested. Action point 89 requires SCDC Council to liaise over any potential for further measures to mitigate harm to designated heritage assets, such as Biggin Abbey and Poplar Hall, during construction, and provide an update. SCDC is still considering any measures that can mitigate construction effects for Biggin Abbey and Poplar Hall. A further response will be provided at Deadline 5 following discussion with the Applicant.</p> <p>e. The primary mitigation for the proposed development is the introduction of landscape planting and an earth bank to screen the development. The Historic Environment Chapter of the ES [AS-030] identifies that this mitigation will alter the character of the present landscape and</p>
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			reduce the openness of views. SCDC will continue to liaise with the Applicant to progress the final design of the scheme and any further mitigation that might be identified moving forward.
	89	<p>HISTORIC ENVIRONMENT (Action Point)</p> <p>Applicant / South Cambridgeshire District Council - Liaise over any potential for further measures to mitigate harm to designated heritage assets, such as Biggin Abbey and Poplar Hall, during construction, and provide an update.</p>	SCDC is still considering any measures that can mitigate construction effects for Biggin Abbey and Poplar Hall. A further response will be provided at Deadline 5 (D5) following discussion with the Applicant.
	90	<p>South Cambridgeshire District Council - Clarify your view as to the potential for permanent adverse construction effects on Baits Bite Lock Conservation Area, noting that your LIR appears to refer to 'change' and 'impact' in respect of this designated heritage asset.</p>	The LIR has now been updated as part of the Deadline 4 submission to clarify SCDC's position at paragraph 9.25.
8		LANDSCAPE AND VISUAL / DESIGN	

		<ul style="list-style-type: none"> a. Consideration of the 'rotunda' design concept associated landscaping and character of the area. b. Appropriateness and adequacy of measures relating to bund planting. c. Matters relating to the LERMP, including its scope. d. Clarification of potential for effects from plumes / flares. e. Tree protection / replacement matters (including woodland). f. Consideration of potential / need for formal detailed design review. g. Consideration of a 'Design Code' and what this would include. 	<ul style="list-style-type: none"> a. SCDC was not consulted as part of the site design selection (of 3 choices) from which the Rotunda design was chosen by the Applicant. SCDC had reservations about the rotunda design when first presented with the design at the earliest consultation sessions. This was highlighted during the engagement process with the Applicant. SCDC would have preferred a different approach that better reflected and was more in keeping with the defined landscape character of the area which includes more linear features and less significant blocks of woodland cover. b. The appropriateness of planting trees upon the bund has been a maintained concern of SCDC. There is a concern that the drier summer-time climate of East Anglia and Cambridge is not suitable for tree planting atop a tall bund. It is accepted that the measures taken by the Applicant are appropriate to aid in mitigating the concerns, however, SCDC notes these measures rely on supplementary watering beyond the standard establishment period which raises sustainability issues. Examples from elsewhere in the country do not provide adequate assurances as historically, East Anglia and the Cambridge region receive the lowest levels of rainfall nationally. Additionally, vegetation and trees which succeed on such earthworks as Fleam Dyke and Devils Dyke are most commonly stunted and not seen as providing significant visual barriers. Areas of
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			<p>vegetation congregates where other roads, rivers etc cross the earthworks and additional water can flow to and around the earthworks improving the water supplies for vegetation. SCDC does not have a recommendation for alternatives or mitigation other than sustained watering during dry periods.</p> <p>c. The submitted LERMP [AS-066] is difficult to follow as a Maintenance Plan. The current format provides many opportunities to overlook elements due to the 'not applicable' entry under the 'timeframe/timing' column. SCDC would welcome greater clarity on the LERMP.</p> <p>d. It is understood and had been assumed to date that the facility will not result in any visible 'smoke' plume.</p> <p>e. Existing trees are not expected to be negatively impacted by the proposals.</p> <p>f. Whilst not specifically recommended by SCDC, a design review at detailed design stage by an external third party such as the Design Review Panel or similar would be welcomed.</p> <p>g. SCDC have not considered the need for a Design Code for Landscape. The scale of the proposals would not warrant a Code given this is a single developer/applicant. Landscape requirements are</p>
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			<p>considered by SCDC to be a suitable way to achieve appropriate landscape proposals. The Proposals submitted so far are generally acceptable (aside from the subject of the bund and it's planting) and has been subject to extensive review by SCDC.</p>
9	-	<p>GREEN BELT (Agenda)</p> <ul style="list-style-type: none"> a. Clarification around which elements would be inappropriate development. b. Consideration of degree to which effects on the Green Belt have sought to be minimised. c. Adequacy of consideration of non-Green Belt sites. d. Clarification around SCDC's view in its Local Impact Report that Green Belt release for housing need through the local plan process would not provide 'exceptional circumstances', whereas the relocation of a WWTP (for which no evident need has been demonstrated) to the Green Belt in order to enable housing development would demonstrate 'very special circumstances'. 	<ul style="list-style-type: none"> a. SCDC considers that the area of land required for the proposed ReWWTP, surrounding earth bank, visitors' car park, and site access road constitute inappropriate development in the Green Belt. In addition, the outfall would also constitute inappropriate development. b. Paragraph 143 of the National Planning Policy Framework (NPPF) sets out five purposes for Green Belt. At a local level, three purposes have been defined for the Cambridge Green Belt ¹. They are as follows: <ul style="list-style-type: none"> i. Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre; ii. Maintain and enhance the quality of its setting; iii. Prevent communities in the environs of Cambridge from merging into one another and with the city.

¹ Cambridge Inner Green Belt Boundary Study by LDA Design. (2015).. <https://www.cambridge.gov.uk/media/2530/rd-mc-030-part1.pdf>

			<p>Although the proposal changes the landscape character of the area, one of the effects of the landscape measures, if successfully implemented, would be to reduce the visual impact of significant utilities infrastructure that would otherwise have an urbanising effect upon the Green Belt. The landscape strategy seeks to reduce the visibility of such infrastructure and, over time, will reduce the impact upon the setting of the City and the existing settlements beyond the City boundary. The landscaping strategy outlined will therefore contribute towards mitigating some of the Green Belt harm.</p> <p>c. SCDC, as the District Council, (not the waste planning authority) considers the site selection methodology employed by the Applicant to be appropriate. The consideration of non-Green Belt sites was a matter for the Applicant and the District Council was not involved in this process.</p> <p>d. Both SCDC and Cambridge City Council (CCC) have been very clear in all submissions to the DCO examination that the preparation of the emerging Greater Cambridge Local Plan (GCLP) and the DCO application for the WWTP relocation are two separate processes that follow their own distinct processes and regulations.</p> <p>The emerging GCLP is consistent with National Policy in that, from a 'plan-making' perspective',</p>
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			<p>the question SCDC and the City Council have to consider is whether there are exceptional circumstances to release land from the Green Belt to meet development needs, including housing, but not including waste and minerals.</p> <p>SCDC's position is set out at paragraph 6.62 of its LIR [REP2-052], and that position is that the Council does not consider that overall housing needs alone provide the 'exceptional circumstances' required in national policy to justify removing land from the Green Belt on the edge of Cambridge for housing in the Preferred Options for the emerging Local Plan (First Proposals) and has clarified that this position is having regard to the identification of the proposed emerging development strategy that can meet needs in a sustainable way without the need for Green Belt release. That last point is important. The Councils' position is in the context that it has so far been possible to identify a development strategy consistent with national and local planning objectives, including proposed site specific allocations for housing, that can meet housing needs in a sustainable way without the need for release of land from the Green Belt on the edge of Cambridge that is significant to the purposes of the Cambridge Green Belt, in particular the setting of Cambridge as a historic city.</p>
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			<p>The Councils have looked on a site-specific basis to consider whether there could be exceptional circumstances for Green Belt release and one site on the edge of Cambridge has been identified as having potential to meet this test, at Cambridge Biomedical Campus on the southern fringe of Cambridge as an extension of an existing internationally important site for life sciences. Three other smaller potential Green Belt releases are proposed in the First Proposals away from Cambridge at Babraham Campus to the south east of Cambridge also for life sciences, and two small sites for housing at Great Shelford and Oakington villages where there is particularly good access to high quality public transport.</p> <p>It is important to be clear that the preferred strategy for the GCLP includes the major brownfield site at North East Cambridge that lies within the urban area of Cambridge and is a highly sustainable location. This is of course consistent with existing policy in the 2018 Local Plans. The emerging GCLP is, by necessity, predicated on the existing WWTP site becoming available if this DCO is approved, so that it can be concluded that the emerging NEC policy is deliverable, being the central test, any Inspector examining the GCLP or NECAAP must apply, and the Councils must meet for their plan.</p>
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			<p>That is because it is simply not possible for the emerging local plan to include any proposals relating to the relocation of the WWTP because neither SCDC or CCC are the LPA for waste and minerals. Waste matters are outside the responsibilities of SCDC as district local planning authority and indeed it would be unlawful for the district council to seek to make any proposals for waste within its Local Plan. It would have been a matter for the County Council as the Waste Planning Authority to address such a proposal within the Minerals and Waste Local Plan. As such, the local plan (and indeed the NECAAP) can only progress so far until there is evidence that the NEC site is deliverable, and that will only be in place if and when the DCO is approved.</p> <p>Significantly, if the DCO were not approved and the NEC site was not available to deliver a new city district, the Councils would need to look to identify a replacement site for the majority of the 8,350 homes identified in the emerging GCLP First Proposals that are dependent on the CWWTP being relocated, and in particular that 3,900 homes for the plan period to 2041. See LIR paragraphs 6.34 to 6.35, Map 1 and paragraphs 6.98 to 6.101 that set out the constraint that the existing CWWTP places on development not only on the current site, but also in the area surrounding it such that only up to 1,425 homes could be delivered if the CWWTP remains in situ and</p>
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			<p>landowners may decide not to bring those land parcels forward for residential if the heart of the new city district cannot come forward. The site of the existing CWWTP is 38.9 ha, whilst the site together with the surrounding constrained area lying within the odour contours is 78.6 ha.</p> <p>If the NEC site is not available, it would be necessary to go through a further process of reviewing the development strategy to identify an alternative site(s) to meet needs for jobs and homes. This will inevitably include reviewing whether the earlier conclusion that there are not exceptional circumstances in principle to justify revisions to the Green Belt remains sound. As set out above, the site that would be required to replace the development capacity unlocked by the relocation of the CWWTP is much larger than the site of the existing CWWTP itself. This reflects not only that displaced development potential needs to reflect the wider constrained area, but also that the NEC site is proposed for a higher density development than has been provided elsewhere reflecting its highly accessible location and excellent public transport links. However, the ExA may find it helpful to be aware as a comparison, that the Cambridge Airport site is 145.4 ha and the GCLP First Proposals identifies it as having potential for 7,000 homes and 9,000 jobs.</p>
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			<p>It is possible that a review of the alternative locations and sites available to meet development needs if the CWWTP is not able to relocate could identify land on the edge of Cambridge in the Green Belt as the most appropriate alternative to NEC to achieve sustainable development and conclude that exceptional circumstances do exist to justify a review of the Green Belt.</p> <p>In a similar way, the Councils' position on exceptional circumstances could also conceivably change given the Development Strategy Update that was published and agreed by the Councils in January 2023 (LIR Appendix 1, GCSP-6) that identifies an increase in the jobs forecast and the housing need to support those jobs, even though the First Proposals did not identify any exceptional circumstances for Green Belt release for housing in principle.</p> <p>Whilst due to the ongoing uncertainty on water supply the Councils have not at this point identified any changes to the First Proposals strategy to meet those increased needs, once the water supply situation is confirmed, it may be necessary to go through a further process of reviewing the development strategy to identify additional sites to meet the increased needs. This will inevitably include reviewing whether the earlier conclusion that there are not exceptional circumstances in</p>
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			<p>principle to justify revisions to the Green Belt remains sound.</p> <p>However, the Applicant is pursuing the proposed relocation through the DCO process. As such, the test applying is whether there are very special circumstances that would justify approving the specific proposal for this new WWTP when having regard to all 'important and relevant' considerations. This clearly needs to have regard to the development comprising inappropriate development in the Green Belt and the extent to which impacts on the purposes of the Cambridge Green Belt and any other harm could be mitigated. The Councils have set out their position in their LIRs that there would be significant planning benefits arising from proposals for a new city district at NEC proposed in the emerging NECAAP and GCLP, and that the delivery of the assessed development needs of those emerging plans and other related benefits are substantial. As such the Councils consider these benefits carry considerable weight as important and relevant considerations to the DCO weighing in its favour.</p> <p>Whether the Applicant's DCO proposal can demonstrate such very special circumstances is clearly for the ExA to determine. However, in the context of the ExA's question, the Council does not see any conflict in principle between the position taken by the Councils in the Preferred Options for</p>
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			<p>the Local Plan to date, and whether there could be VSC that justify approval of the DCO.</p> <p>In summary, the Councils' position is:</p> <ul style="list-style-type: none"> i. Exceptional circumstances for the allocation of a waste water site in the Green Belt is a matter for the County Council as the waste planning authority, ii. The Councils consider in the context of the First Proposals, that for housing and jobs, there are no exceptional circumstances to justify in principle the release of land from the Green Belt on the edge of Cambridge, although a very limited number of site-specific exceptional circumstances have been identified. iii. The Councils support the principle of the DCO development in the Green Belt based on a recognition of all the benefits that are capable of being very special circumstances.
<p>10*</p>	<p>-</p>	<p>NOISE AND VIBRATION</p> <ul style="list-style-type: none"> a. Residential receptor sensitivity. b. Likely operational impacts of emergency generators. c. Noise and vibration impacts during decommissioning. 	<ul style="list-style-type: none"> a. There is some disagreement with how residential receptors have been assessed as having only medium sensitivity by the Applicant. This does not appear to take into account the relatively quiet background which is likely to provide a high degree

		<p>d. Disapplication of s61 of the Control and Pollution Act 1974.</p> <p>e. Mitigation and monitoring (including handling of complaints, building condition surveys and controls within the CoCP Parts A and B).</p>	<p>of rural tranquillity to existing receptors of the proposed site.</p> <p>b. SCDC does not consider that there would be significant operational impacts arising from emergency generators.</p> <p>c. Decommissioning and vibration impacts during the decommissioning of the existing WWTP would be a matter for Cambridge City Council (CCC).</p> <p>d. SCDC agree with the disapplication of S.61 of the CAPA 1974 and with reliance upon the CEMP as providing the regulatory framework to reduce the impact of construction and development of proposal. The District Council is satisfied with the mitigating information submitted in the CEMP to date.</p> <p>e. SCDC are satisfied with the Applicant's approach to mitigation and monitoring (including handling of complaints, building condition surveys and controls within the CoCP Parts A and B).</p>
11	-	<p>LAND QUALITY</p> <p>a. Groundwater contamination investigation and monitoring.</p> <p>b. Decommissioning and contamination.</p>	<p>a. Risks to controlled waters from soil or groundwater contamination falls within the remit of the Environment Agency, who would also be able to advise on any required groundwater monitoring.</p>

			<p>In terms of the siting of the new WWTP, the outcome of the Preliminary Risk Assessment Report, forming Appendix 14.1 [AS-089], is for intrusive ground investigation. The required ground investigation to assess land quality is understood to be partially complete and ongoing, with full Ground Investigation Reports expected to be provided later once available.</p> <p>Despite the absence of a full ground investigation at this stage, it is agreed that information within the preliminary risk assessment demonstrates that risks from ground conditions to construction workers, final end users (WWTP workers) and occupants of nearby residential and commercial properties, are not likely to be high or of significant effect.</p> <p>Satisfactory mitigation of any risks present is provided through adherence to the Environment Agency guidance Land Contamination: Risk Management (LCRM) as well as measures within the Code of Construction Practice (soil management, PPE requirements, unexpected contamination protocol).</p> <p>b. Decommissioning of the existing plant, and any associated contamination, is within Cambridge City Council's area and would need to be addressed when the site comes forward for redevelopment.</p>
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12*	-	<p>ODOUR</p> <p>a. Impacts during decommissioning. b. Control of odour through the dDCO and environmental permitting.</p>	<p>a. The Applicant has identified that odour produced from sewage works as moderately offensive. This is taken from the IAQM odour guidance (2018) which states that a sewage works, if operating normally, can be considered to be as such. The District Council would have preferred a more cautious approach by classifying the odour as “highly offensive”. This would allow more leeway to future proof for future years with a likely evolving influent which is likely to be impacted by climate change (drier weather) and large-scale developments on separate systems as well as designed with less water usage that will derive benefit of the proposed development.</p> <p>It is recognised that, irrespective of the classification of the odour, the proposed site is designed to reduce odour emissions to as low as practicable.</p> <p>b. It is recognised that the Environment Agency (EA) would be the regulator of the site who would have specialist knowledge of these sites. Further discussion between the Applicant and SCDC on odour mitigation measures will be welcomed as the scheme develops.</p>
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	<p>102</p>	<p>OTHER MATTERS (Action Point)</p> <p>Cambridge City Council - Provide a response to IP comments around potential for any future redevelopment of the existing WWTP site and AQMA implications.</p>	<p><i>This section applies to both SCDC and CCC insofar as it relates to Air Quality Management Areas (AQMA)</i></p> <p>At the Environmental Matters hearing, Save Honey Hill Group commented that due to the proximity of the CWWTP site to the A14 and the Air Quality Management Area, the proposed redevelopment of the site in the Proposed Submission NECAAP and emerging GCLP to include residential development close to the A14 would not be acceptable. This is included as number 102 in the ExA's Action Points arising from the hearing. This has been directed to Cambridge City Council but is also relevant to South Cambridgeshire District Council. The Councils' response to that point is as follows.</p> <p>The A14 AQMA², which lay within SCDC's administrative area, was revoked in January 2022 because air quality monitoring showed that the area no longer exceeded the threshold for designation. This had been anticipated following the completion of the major A14 Cambridge to Huntingdon improvement scheme, which was fully completed in June 2022.</p>
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² <https://www.scams.gov.uk/environmental-health/pollution/air-pollution/local-air-quality-management>

			<p>SCDC and CCC continue to monitor the air quality adjacent to the A14 using a Defra approved continuous monitor. This monitor can be considered to be representative of the conditions immediately to the south of the A14 along this stretch of the road. The latest set of ratified annual results available from this monitor indicate levels of nitrogen dioxide and particulate matter are well below nationally set Air Quality Objectives. Annual results from all SCDC monitoring can be viewed in an Annual Status Report available on the link provided above, which also includes a link to live data from the continuous monitor.</p> <p>The NECAAP evidence was prepared before the AQMA was revoked given the Proposed Submission NECAAP was agreed by the Councils in January 2022. The evidence includes an Environmental Health Topic Paper (November 2021)³, which is informed by an Air Quality Modelling Study prepared in 2019. As demonstrated in the Topic Paper in Figures 1 to 8, in the vicinity of the CWWTP, based on data at that time, there was a limited strip of land immediately south of the A14 and along the northern boundary of the CWWTP where air quality exceeded acceptable levels for sensitive receptors such as residential.</p>
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³ <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-12/NECAAPTEnvironmentalHealth2020v32021.pdf>

			<p>With the revocation of the AQMA, it is anticipated that situation will have improved. Notwithstanding, for this and other environmental considerations, the Proposed Submission NECAAP (see SCDC LIR Appendix 1 reference GCSP-7, Figure 10: Spatial Framework) proposes that the existing substantial landscape buffer between the CWWTP site and the A14 would remain, with residential development being designed and sufficiently distanced from the A14 to ensure no unacceptable adverse impacts, including in respect of air quality. The NECAAP also includes policies to ensure that the design and location of sensitive receptors such as residential development ensure an appropriate living environment. This issue has been capable of being satisfactorily addressed in other locations along the southern boundary of the A14 for example at Orchard Park which lies between Cambridge Regional College and Histon Road and there is no reason to consider that cannot be the case here.</p>
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