



Cambridge Waste Water Treatment Plant Relocation Project
Anglian Water Services Limited

Statement of Common Ground: Save Honey Hill Group

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1	03/11/2023	-	
2	16/01/2024	---	Updated by the Applicant for Deadline 4 following responses from SHH to version 1.

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1 Introduction

1.1 Purpose of this Document

- 1.1.1 This Statement of Common Ground (“SoCG”) is submitted as part of an application by Anglian Water Services Limited (“the Applicant”) for a Development Consent Order (DCO) under the Planning Act 2008 (‘the Application’) for ~~the~~ for the Cambridge Waste Water Treatment Plant Relocation Project (CWWTPR).
- 1.1.2 The Applicant is proposing to build a ~~new modern, low carbon~~ waste water treatment plant for Greater Cambridge on a ~~new site, area in the Cambridge Green Belt, north~~ north of the A14 between Fen Ditton and Horingsea within the Cambridge drainage catchment area ~~and in the Cambridge Green Belt,~~ to replace the plant on Cowley Road, hereafter referred to as the existing Cambridge Waste Water Treatment Plant.
- 1.1.3 This SoCG has been prepared by the Applicant and with Save Honey Hill Group (SHHG). Any reference to ‘the parties’ means the Applicant and SHHG.
- 1.1.4 This SoCG has been prepared to identify matters agreed and matters currently under discussion or not agreed between the Applicant and SHHG.
- 1.1.5 To date, the Applicant has consulted and engaged with SHHG, as set out in Section 2 and Appendix 1 of this SOCG.

Commented [KT1]: Not agreed. It is not acceptable to change the project description.

1.2 Approach to the SoCG

- 1.2.1 This SoCG will evolve as the DCO application progresses through examination. It is structured as follows:
 - Section 2 confirms the pre-application consultation undertaken to date between the Applicant and SHHG;
 - Section 3 identifies the relevant documents which have been considered by the parties; on which the agreements recorded in this SoCG were reached;
 - Section 4 provides a summary of matters that have been agreed, are under discussion and not agreed;

Commented [IG2]: See comments at start of Section 4

Agreed	indicates where the issue has been resolved and is recorded in Green and marked “Low”
Under Discussion	indicates where these issues or points will be the subject of on-going discussion whenever possible to resolve or refine the extent of disagreement between the parties and is recorded in Amber and marked “medium”
Not Agreed	indicates a final position and is recorded in Red and marked high

- Section 5 includes the signatures of all parties to confirm their agreement that this SoCG is an accurate record of issues and discussions as at the date of this SoCG.

1.3 Status of the SoCG

- 1.3.1 This version of the SoCG represents the position between the Applicant and SHHG as ~~at 15 November~~ ~~of October~~ 2023 (covering the pre-examination and initial examination stage of the process). The SoCG will continue to be reviewed, discussed and progressed through examination stages as well as any actions arising from the Issue Specific Hearings. A ~~Principle~~ Principal Areas of Disagreement document on specific points between SoCG's will be updated and submitted to the Examining Authority (ExA) during the examination to reflect issues that require further discussion to achieve agreement.

2 Consultation and engagement

- 2.1.1 Phase One consultation consulted the community on three shortlisted site options (identified through earlier stages of the selection process)- between 8 July – 14 September 2020. SHHG was formed from two groups of residents in Fen Ditton and Horningsea in early 2020, who were concerned about the proposed relocation. SHHG advised and assisted the community responding to ~~after~~ the Phase One consultation and has participated throughout the remainder of the pre-application engagement.
- 2.1.2 In June 2021 a Community Working Group (CWG) was set up to engage and provide updated information to representatives of the community on an ongoing basis and outside of statutory consultation periods. Representatives from- SHHG were invited to be part of this group. The ongoing engagement through the CWG meetings are set out in Appendix 1, Table 1.1 – Schedule of Engagement. SHHG asked to be included in the relevant Technical Working Groups (TWGs) which discussed design, landscaping and other matters, but this was rejected by the Applicant as the TWGs were forums for engaging with technical stakeholders.
- 2.1.3 SHHG were consulted under Section 47 of the 2008 Act during Phase Two consultation. Phase Two consultation was held from 23 June until 18 August 2021-.
- 2.1.4 The Applicant treated SHHG, a non-prescribed consultee as per Schedule 1 of the Applications: Prescribed Forms and Procedure Regulations 2009, as 'deemed to be prescribed' and consulted them as a Section 42 consultee under the 2008 Act at Phase Three Consultation. Phase Three consultation ran from 24 February until 27 April 2022. SHHG response and how the Applicant had regard to this can be found in the application document 'Applicant Regard to S42 Responses' (Doc Ref 6.1.3) [APP-167].
- 2.1.5 The Applicant further undertook an additional round of targeted statutory consultation and consulted SHHG as part of this. SHHG's response and how the Applicant had regard to this can be found in the application document 'Target Statutory Consultation under Section 42 of the 2008 Act' (Doc Ref 6.1.30) [APP-195].
- 2.1.6 SHHG responses during the consultation phases, were duly considered and as a result the Applicant changed aspects of the design for CWWTTPR, as ~~These changes are~~ outlined in Appendix 1, Table 1.2 Design Changes as well as being detailed in the Applicant's Consultation Report (App Doc Ref 6.1.2) [APP-166]. Note that SHHG has

~~corrected disagrees with elements of the text in Table 1.2 for accuracy and may differ from that reported in the Applicant's Consultation Report.~~

2.1.7 For further information on the pre-application consultation process please see the Consultation Report (App Doc Ref 6.1) [\[AS-115\]](#).

3 Documents considered in this SoCG

3.1.1 In reaching common ground on the matters covered in this SoCG, the parties have considered ~~all of the relevant application documents, including the following documents:~~

- Design and Access Statement (App Doc Ref 7.6, section 11.2) [\[AS-168\]](#)
- Design Plans - Proposed Waste Water Treatment Plant (App Doc Ref 4.9.1) [\[REP1-019\]](#)
- Draft Development Consent Order (App Doc Ref 2.1) [\[REP3-003\]](#)
- Environmental Statement: Project Description (App Doc Ref 5.2.2) [\[REP3-017\]](#)
- Environmental Statement: Chapter 3 (App Doc Ref 5.2.3) [\[AS-018\]](#)
- Environmental Statement: Chapter 9 (App Doc Ref 5.2.9) [\[APP-041\]](#)
- Environmental Statement: Chapter 10 (App Doc Ref 5.2.10, section 2.9.1) [\[REP3-019\]](#)
- Environmental Statement: Chapter 13 (App Doc Ref 5.2.13) [\[REP1-023\]](#)
- Environmental Statement: Chapter 15 (App Doc Ref 5.2.15) [\[AS-034\]](#)
- Gateway Building Plan (App Doc Ref 4.10.1) [\[APP-024\]](#)
- Landscape Ecology and Recreational Management Plan (App Doc Ref 5.4.8.14) [\[AS-066\]](#).
- Outline Decommissioning Plan (App Doc Ref 5.4.2.3 V3; section 6.2) ~~[\[AS-051\]](#)~~.
- Planning Statement (App Doc Ref 7.5) [\[REP1-049\]](#)
- Planning Statement: Green Belt Assessment (App Doc Ref 7.5.3) [\[APP-207\]](#)
- Schedule of Amendments (App Doc Ref 1.8) [\[APP-008\]](#)
- Statement of Requirement (App Doc Ref 7.2) [\[APP-201\]](#)
- The Funding Statement (App Doc Ref 3.2) [\[APP-013\]](#)
- The Consultation Report (App Doc Ref 6.1 V2) [\[AS-115\]](#)

Commented [KT3]: The text doesn't say whether we have "adequately" considered them just that we have and that SHH have. We have, however, amended the document version numbers to refer to versions superceding those listed.

4 Summary and Status of Agreement

4.1 Matters

- 4.1.1 Table 4.1 below details the matters agreed, matters under discussion and matters not agreed with Save Honey Hill Group (SHHG). The status of these matters adhere to the key outlined in 1.2.1 in this document. [There appears to be a fundamental confusion here between the use of Red/Amber/Green and the high/medium/low ratings and whether the rating represents the importance of the issue or the extent to which it has been agreed. SHHG would much prefer that the RAG ratings are removed and that this table records simply the most relevant matters that have been agreed or are not agreed. Where discussion is ongoing that can be recorded to be removed when the SoCG is signed. If the Applicant wants 'matters not agreed' to be in a separate PADS document, this is acceptable to SHHG]
- 4.1.2 For more details of the points raised reference should be made to the application and submissions into the Examination.
- 4.1.3 This SoCG addresses those points that SHHG and the Applicant have had capacity to explore together in discussions. As such, it is not inclusive of all matters between the parties relevant to Examination, if a matter appears in the submissions of the Applicant and/or SHHG but is not addressed in this SoCG it does not mean it is not a relevant matter for ExA to consider the party that made that submission.

Commented [KT4]: This has been included as set out following the recommendation by ExA in their Rule 6 letter to follow this format. All other Statements of Common Ground follow the same format as a result of this recommendation.

Table 4.1 details the summary of matters agreed and not agreed and status of matters agreed between the Applicant and SHHG.

Statement/document on which agreement is sought.	Status	Extent of Agreement	Comments
Law and Policy The legal and policy framework for decision making.	High	The Applicant notes the Relevant Representations submission made to the Examining Authority. The Applicant and SHHG agree that the question of whether the Proposed Development is not an NSIP, as it is below the threshold in for the purposes of s.29 of the Planning Act 2008 and this is not altered by the existence of the s.35 direction.- SHHG consider that the proposed development does not meet the	

Commented [IG5]: Delete this column. Extent of Agreement could be divided into Matters Agreed and Matters subject to discussion/not agreed

Commented [KT6R5]: Please see the ExA Rule 6 letter. This is what the ExA asked for.

<p>Need for the project The need for relocation of the CWWTP.</p>	<p>High</p>	<p>thresholds set out in s29 Planning Act 2008, whereas the Applicant's position is set out in its submissions on the applicability of s104/105 Planning Act 2008 to the decision [AS-126] in that without prejudice to being able to pursue the point in further cases, the Applicant does not seek to take the point that the Proposed Development meets the threshold in s29(1) in relation to the Application.</p> <p>The Applicant notes the Relevant Representations submission made to the Examining Authority. The Applicant and SHHG agree that the proposed development cannot rely on any presumption of need under s.104 of the Planning Act 2008 or in the NPSWW. It is also agreed that the Applicant must demonstrate need for the proposed development. <u>The Proposed Development is not required to meet operational requirements. It is also agreed that the Applicant must demonstrate need for the proposed development and that the proposed development is not required to meet operational requirements. The development falls to be determined under s.105, both because it is not an NSIP and because it falls outside the scope of the NPSWW.</u></p>	<p>Formatted: Font: 12 pt</p> <p>Formatted: Font: 12 pt</p> <p>Formatted: Font: 12 pt</p> <p>Formatted: Font: 12 pt</p> <p>Formatted: Font: (Default) +Body (Calibri), 12 pt</p>
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<p>Alternatives The inadequacies in Anglian Water’s assessment of alternatives.</p>	<p>High</p>	<p>The Applicant notes the Relevant Representations submission made to the Examining Authority. <u>SHHG considers that no or an inadequate assessment of the remaining on site alternative was made and that the assessment of other alternatives was flawed. The Applicant disagrees and considers its position is set out in the Site Selection Reports {REP2-011 to REP2-018} and the alternatives chapter of the ES [AS-018]</u></p>
<p>Development Plan The application is contrary to policy in the NPPF, the adopted and emerging local plans.</p>	<p>High</p>	<p>The Applicant notes the Relevant Representations submission made to the Examining Authority. <u>The Applicant and SHH agree that neither the adopted or emerging local plans contain policies requiringe the Proposed Ddevelopment to come forward-relocation of the existing waste water treatment plant</u></p>
<p>Green Belt The impact of the proposal on the Green Belt.</p>	<p>High</p>	<p>The Applicant notes the Relevant Representations submission made to the Examining Authority. <u>The Applicant and SHH agree that the entire elements of the proposed development situated in the Green Belt iscomprise ‘inappropriate’ development in the Green Belt and that very special circumstances must be demonstrated in order for development consent to be granted.</u></p>
<p>Design, Engineering and Landscape Concerns The impact of the proposal on character and</p>	<p>High</p>	<p>The Applicant notes the Relevant Representations submission made to the</p>

appearance, including design and landscape impact.		Examining Authority.
Carbon The carbon footprint of the Proposed Development.	Medium	The Applicant notes the comments in the Relevant Representations and <u>provided responses to queries at Deadline 3. The Applicant will continue to work with SHHG to seek to produce agreed narrow areas of disagreement on carbon assessments of the PD so far as possible. review the strategic carbon assessment.</u>
Environmental Effects, Mitigation and Harm The environmental harm which will result from the development.	Medium	The Applicant <u>notes the comments and evidence included in the Relevant Representations concerning the adequacy of the Environmental Statement acknowledges the comments made to date and has worked with SHHG to agree the reduction in the height of the proposed earth work bund, reduce and redesign the Gateway Building to site this within the earthwork bank and to provide alternative photomontages as part of the visual impact assessment.</u>
Funding and Deliverability The funding and deliverability of the Development Consent Order.	High	The Applicant acknowledges the comments raised during consultation and in the Relevant Representations <u>but disagrees with SHHs comments in relation to certainty of delivery and adequacy of funding. and has set out full details within the Funding Statement (App Doc Ref 3.2).</u>
Overall Planning Balance The overall planning balance that the Examining Authority will be required to undertake.	High	The Applicant notes the Relevant Representations submission made to the Examining Authority. <u>As above, the</u>

		<p>Applicant and SHHG agree that very special circumstances must be demonstrated before development consent can be granted, but disagree as to whether very special circumstances have been demonstrated.</p>
<p>DCO Provisions The content of the draft DCO and requirements.</p>	<p>Medium</p>	<p>The Applicant continues to engage with SHHG in relation to the dDCO, plans and management plans, in particular proposed amendments to Schedules 1 and 14 and to the schedule of Requirements, Schedule 2. The Applicant and SHHG disagree about the drafting of certain parts of the dDCO. SHHG's position and the Applicant's response is set out in the Applicant's response to deadline 2 submissions [REP3-045].</p>



5 Agreement on this SoCG

This Statement of Common Ground has been jointly agreed by:

Name: _____

Signature: _____

Position: _____

On behalf of: **Anglian Water Services Limited**

Date: _____

Name: _____

Signature: _____

Position: _____

On behalf of: **Save Honey Hill Group**

Date: _____

Appendix 1

Table 1:1 Schedule of engagement undertaken to date with Save Honey Hill Group

Issues discussed <ul style="list-style-type: none"> Appointed a chair Presentation from Anglian Water (AW) Live Q&A session. 	Introductory meeting with Site Area Community Working Group (CWG) 21 April 2021
Issues discussed <ul style="list-style-type: none"> Presentation from AW Key issues and challenges Live Q&A session 	First full CWG 2 June 2021
Issues discussed <ul style="list-style-type: none"> Project update Review of phase two consultation feedback Earthwork bank Architectural finishes Landscape proposals Recreation and connectivity Discovery Centre Odour 	CWG 2 December 2021
Issues discussed <ul style="list-style-type: none"> Traffic and access criteria Live Q&A session 	CWG 13 December 2021
Issues discussed Findings of the Consultation Summary Report Decisions made following the previous round of consultation, including traffic and access option chosen following feedback received from Section 47 and Section 42 consultees.	CWG 13 January 2022
Issues discussed <ul style="list-style-type: none"> Phase Three consultation feedback Key design areas Next steps Live Q&A session 	CWG 28 June 2022
Issues discussed <ul style="list-style-type: none"> Phase Three consultation feedback Overview of Targeted Consultation Design changes Changes to layout of wider site area Changes to Gateway Building and Discovery Centre Live Q&A session 	CWG 19 January 2023
Meeting requested by SHHG following site announcement, to answer questions on and hear suggestions for mitigation at the chosen site.	Meeting with SHHG 2 March 2023
Issues discussed <ul style="list-style-type: none"> Consultation Design Cost 	

-
- Environmental factors
 - Traffic routes
 - Archaeology

Actions

AW agreed to provide Figure 4a and 4b of Annex M of the odour report.

AW to provide HIA once published and willing to attend future meetings to discuss this and other matters in more detail.

* On 14 March 2022, the Applicant invited Save Honey Hill to another meeting during the Phase Three consultation. However, the group responded stating that due to the events that had already been attended and the opportunity to ask questions via the information lines, that there was no need for another meeting at this time.

Table 1:2 Design changes as a result of consultation feedback from Save Honey Hill Group

Topic area	Comment	Applicant response
Design Gateway Building	The Discovery Centre is unnecessary and adds to parking, which should be sited within the earthworks bank. The Gateway Building should be reduced in size; its mass and industrial design is inappropriate in a rural setting.	Following stakeholder response to Phase Three Consultation the Gateway Building has been reviewed in order to reduce the visual impact. The scheduled use of the discovery centre is part of the Gateway Building and is a cornerstone to the design narrative.
Landscape and visual Earth bank	The reasoning behind reduction in height of the proposed earth bank should be ignored since the outcome is unacceptable. The earth work bank should be built to a minimum of 7m with dense vegetation included on the top.	Following Phase Three Consultation responses the design has been reviewed. The earth bank height needs to be considered alongside the other amendments that have taken place to the infrastructure and internal levels of the site. The ground level inside the earth bank has been lowered by 1m and therefore the 5-metre earth bank is the equivalent of a 6m screening barrier compared to that shown at CON3 before any structural height changes to the infrastructure internal to the proposed WWTP. The design approach has balanced the height and mass of the earth bank and its screening function. The higher the earth bank the more it will screen but the greater the impact the earthwork itself is likely to be more visible from close viewpoints will have on the landscape and historic environment. From existing ground levels in the wider context, a 5m high earth bank will be perceived as a long, linear form in the landscape which, from all but the closest locations, will not appear above the skyline. It will be integrated into its landscape setting. Increasing the height of the earthwork by 1-2m would substantially increase its presence in the landscape and would enlarge the area slightly from where it would appear above the skyline. A 7m high earthwork would be more prominent in close views than a 5m high earthwork but would not have a substantially noticeably greater screening effect when viewed from more distant locations because the tallest elements on the proposed WWTP would remain visible above the earth bank.

Commented [KT7]: None of these amendments can be agreed as they seek to amend the Applicants response submitted in a final document.

Landscape and visual
Photomontages

Note our comments re visual impact assessment - see page 16 - page 20 of SHH and Appendix I of the consultation response with alternative photomontages that should be considered.

The Applicant has fully considered all comments provided by all stakeholders on landscape mitigation, during development of the project and formally as part of the Phase Three Consultation. The viewpoints with a sub-set of photomontages were discussed with the TWG for Landscape and Heritage. The locations were then adjusted based on the feedback from the members of this group. Prior to these walkovers were alongside initial ZTV models and GLIVIA3 guidance to understand locations where the Proposed Development could be viewed from. Parish Council input and Save Honey Hill responses have been considered and taken into account. Therefore, the Applicant is confident that there has been a comprehensive set of viewpoints methodology adopted put forward for assessing visual impact.

Landscape and visual
Mitigation

The extent of off-site planting proposed should be reviewed in relation to the critique of the PEI LVA assessment and recommendations above (section 2.3.1 to 2.3.5. 2 A more ambitious approach is taken to mitigation in order to soften longer distant views of the large number of taller elements from all aspects north, south, east and west of the surrounding area in association with stakeholders and local communities. Single rows of tree planting and filling hedgerow gaps are examples.

Following Phase Three Consultation the design has been amended to help mitigate improve the visual impact. The Applicant has reviewed the landscape masterplan and a significant modification has been made in design to address comments take on board the comments made about the need to improve visual mitigation. The Applicant has reviewed design, building heights, mass of buildings and planting. They have also modified planting design to be more aligned with the local landscape. The amended designs have significantly improved the visual impact. Colour palette and final design of Gateway Building are to be determined under DCO Requirement and so will remain indicative only at this point. Furthermore, following Phase Three Consultation, there is an addition of larger trees to the early planting and woodland edges, instead of just whips and transplants. The new mitigation measures work to reduce impacts as far as possible within the landscape, through a combination of visual screening from the earthwork and over time the vegetation and a balance of openness and woodland blocks and belts. These changes remove the need for further off site mitigation planting. Further off site mitigation planting has been rejected by the Applicant.





Get in touch

You can contact us by:



Emailing at info@cwwtpr.com



Calling our Freephone information line on **0808 196 1661**



Writing to us at **Freepost: CWWTPR**



Visiting our website at www.cwwtpr.com

You can view all our DCO application documents and updates on the application on The Planning Inspectorate website:

<https://infrastructure.planninginspectorate.gov.uk/projects/eastern/cambri-dge-waste-water-treatment-plant-relocation/>