

Cambridge Waste Water Treatment Plant Relocation Project
Anglian Water Services Limited

Initial Principal Areas of Disagreement

Application Document Reference: 7.7

PINS Project Reference: WW010003

Version 4
February 2024

Document Control

Document title	Principal Areas of Disagreement
Version No.	02
Date Approved	20 November
Date 1st Issued	20 November

Version History

Version	Date	Author	Description of change
01	20/11/23		
02	05/12/23		Progress on Principal Ares of Disagreement as at Deadline 2
03	22/01/2024		Updated for Deadline 4
04	19/02/24		Updated for deadline 5

Contents

- 1 Introduction 1
- 1.1 Background 1
- 2 Purpose of document 1
- 3 Structure of the PAD..... 1
- 4 Summary of areas..... 3

1 Introduction

1.1 Background

- 1.1.1 The Applicant is proposing to build a modern, low carbon waste water treatment for Greater Cambridge on a new site area north of the A14 between Fen Ditton and Horningsea within the Cambridge drainage catchment area, to replace the plant on Cowley Road, hereafter referred to as the existing Cambridge Waste Water Treatment Plant Relocation Project (CWWTPRP).
- 1.1.2 A detailed description of the CWWTPRP can be found in Chapter 2 of the Environmental Statement (ES) (App Doc Ref 5.2.2) [APP-034].

2 Purpose of document

- 2.1.1 The Principal Areas of Disagreement (PAD) is submitted as part of an application by Anglian Water (“the Applicant”) for a Development Consent Order under the Planning Act 2008 (‘the Application’) for the CWWTPRP.
- 2.1.2 This PAD document relates to the Statement of Common Grounds (SoCGs) and highlights the areas, at the time of submission, which have not yet been agreed.
- 2.1.3 Whilst the Applicant is proactively engaging with stakeholders and stakeholders continue to co-operate with the development of the SoCGs, the PAD serves as a useful tracker to the status of the SoCGs and the areas that still require engagement time and/or will impact on examination time.
- 2.1.4 The document has been prepared to provide the Examining Authority with a summary position as of Deadline 5 (19 February 2024), with regard to the current position on SoCGs between the Applicant and prescribed consultees, statutory undertakers and interested parties in relation to the proposed scheme.

3 Structure of the PAD

- 3.1.1 To ensure consistency in the approach taken to documenting the matters of disagreement, Table 3.1 is presented to show areas of disagreement and the position for each area as follows:

	Matter subject to further discussion
	Matter not agreed
	Final position agreed by both parties

- 3.1.2 Table 4.2 outlines the matters not agreed or under discussion and provides an indication of the deadline the Applicant hopes the agreement will be resolved.

Table 3.1: Summary of areas of disagreement

Stakeholder	Agriculture land and soils	Alternatives	Biodiversity and ecology	Carbon	CoCP	Draft DCO	Development plan	Design and engineering	Ecological receptors	Environment Impact	Funding	Green Belt	Flood risk	Health	Historic and heritage Environment	Hydrological Impact Assessment	Landscape and Visual	Law and policy	Management Plans	Odour	Overall planning	Project need	Project permits	Protective Provisions	Public Rights of Way	Recreational and visitors	Site access	Waterbeach station access	Site selection	Traffic and transport	Water
Cadent																															
Cambridge Water																															
Cambridge City Council								Yellow												Yellow									Yellow		
Cambridgeshire County Council			Yellow	Yellow															Yellow	Yellow										Red	
Emergency Services																															
Historic England															Yellow																
Natural England	Yellow								Yellow																	Yellow					Yellow
National Highways						Yellow		Yellow																Red							
Network Rail																								Yellow							
Save Honey Hill		Red		Red			Red	Red		Red	Red	Red					Red	Red				Red	Red	Red					Red		
SLC Rail																															
South Cambridgeshire District Council			Yellow					Yellow																				Yellow			
The Cam Conservators						Yellow																		Yellow							
The Environment Agency													Yellow										Yellow								
The National Trust								Red																	Yellow						Yellow
The Swaffham Internal Drainage Board																															
The Wildlife Trust				Red																					Red	Red	Red		Red		
UKPN (Eastern Power Networks)																								Yellow							
Waterbeach Development Company LLP																											Yellow		Yellow		
Waterbeach Internal Drainage Board																															

4 Summary of areas

Table 4.2: Matters not agreed or under discussion at Deadline 5

Stakeholder	Area of disagreement	Comment	Applicant's view on the matter and necessary actions
Cambridge City Council	Alternative site	Removed as per ISH3. Agreed	The evidence base supporting the emerging Greater Cambridge Local Plan concludes that, of all the spatial options considered, the NEC site (which includes the proposed development site) is the most suitable and sustainable location for development in Greater Cambridge.
Cambridge City Council	Landscape and Visual	Do not agree that the selected design for the project is reflective of the local landscape.	The Applicant considers that the design approach to the plant is justified and appropriate.
Cambridgeshire County Council	Biodiversity	Potential adverse effects have been identified on the ecological receptors including protected sites, habitats and protected species.	Full review of impacts of adverse effects still under review.
Cambridgeshire County Council	Biodiversity	Mitigation proposals	Still in discussion and review.
Cambridgeshire County Council	Biodiversity	Biodiversity Net Gain	The Applicant to provide more detail on how 20% BNG will be secured within the DCO, and provide information on the delivery of BNG for river units.
Cambridgeshire County Council	Management Plans	Code of Construction Practice (CoCP) Part A (App Doc Ref 5.4.8.1) Protection not provided for all ecological receptors during construction. Landscape Ecology and Recreational Management Plan (LERMP) (App Doc Ref 5.4.8.14) Secured in Requirement 11 Does not cover the entire scheme and therefore does not cover the mitigation and management of all receptors. Outline Construction Outfall Management Plan Determine if adequate protection and mitigation is provided.	The Applicant will continue to work with the Local Planning Authority to agree proposals set out in the management plans.

Stakeholder	Area of disagreement	Comment	Applicant's view on the matter and necessary actions
		<p>Requirement 10 Outfall Alter the wording of requirement 10 to reflect the Applicants commitment to deliver 20% BNG river units.</p> <p>Lighting Design Strategy Confirm the level of lighting spill associated with the operational phase, as well as additional mitigation measures will be implemented at the new WWTP.</p> <p>Outline Construction Environmental Management Plan (CEMP) Include a detailed Construction Ecological Management Plan.</p>	
Cambridgeshire County Council	Carbon The Environmental Statement Chapter 10 (App Doc Ref 5.2.10).	<p>Table 2-3 - carbon emissions for operation are presented for 30 years, need to present what will likely happen after 30 years.</p> <p>Section 4.4 - include decommissioning impact on waste disposal, vehicle movements, construction emissions and construction waste disposal</p> <p>Sections 4.4.6, 4.4.7, 5.1.5 and 5.1.6 Include how the proposed operational emissions compare to those of the existing plant.</p> <p>Appendix 10.1 GHG Clarify if the net emissions 'per year' referred to in 4.4.7 and Figure 4.3 (and in Table 5-1) – is equal to the figure for year 1, or for an average year across the 30 years?</p>	The Applicant will review comments in relation to the Carbon Chapter of the Environmental Statement made in the Relevant Representations and, where appropriate, make necessary amends.

Stakeholder	Area of disagreement	Comment	Applicant's view on the matter and necessary actions
Cambridgeshire County Council	Health The Environmental Statement Chapter 12 (App Doc Ref 5.2.12)	<p data-bbox="772 183 1377 327">Include and reference other Joint Strategic Needs Assessments, for example "Transport and Health JSNA", "New Housing and the Built Environment JSNA".</p> <p data-bbox="772 359 1377 502">Table 2-8 More information to ensure good access is maintained to local services (Fen Ditton school) during the construction</p> <p data-bbox="772 534 1377 614">The impact of the "ventilation stack" should be assessed for future residential receptors.</p> <p data-bbox="772 646 1377 758">Address the impact on the Gypsy and Traveller population and the health impacts on construction workers.</p> <p data-bbox="772 790 1377 1109">The Decommissioning Plan (App Doc Ref 5.4.3) Sections 6.2-6.5, 6.7-9, and 6.11-6.13 Include more information regarding the decommissioning process and responsibility for decontamination. Include more information about how the decommissioned site will be secured to avoid targets for theft, vandalism and general antisocial behaviour.</p> <p data-bbox="772 1141 1377 1356">The Decommissioning Plan (App Doc Ref 5.4.3) Section 6.15.4 Provide assessment and impact of the process of emptying the "tanks" on site and "punching holes in them to prevent water build has on human health.</p>	The Applicant will review comments in relation to the Health Chapter of the Environmental Statement made in the Relevant Representations and, where appropriate, make necessary amends.

Stakeholder	Area of disagreement	Comment	Applicant's view on the matter and necessary actions
		Provide an assessment and impact on human health on the need for temporary odour control/scrubbers.	
Cambridgeshire County Council	Historic environment	Mitigation of construction impacts on undesignated heritage assets of archaeological interest should be undertaken to define the scope of archaeological investigation.	Programme to be agreed with CCC Historic Environment Team
Cambridgeshire County Council	Landscape and Visual Amenity	The new dedicated Public Bridleway linking Low Fen Drove with Station Road is an appropriate enhancement proposal.	The landowners preference for a permissive route has not been possible to progress further. The Applicant has confirmed that the DCO default position of a permanent public bridleway is to be taken forward. Agreement has been reached with the Landowner in this respect.
Cambridgeshire County Council	PRoW	Inclusion of equestrians along the B1047 over the A14 Bridge into Fen Ditton.	It is agreed that provision for Equestrians will be managed with the amendment to the current highway design proposals for parapet for the A14 overbridge to be increased to 1.8m for the benefit of equestrians.
Cambridgeshire County Council	Noise and vibration	More assessment needed.	Further assessments required to ensure no impacts on human health from noise and vibration once fixed plant locations e.g. pumping station have been determined and confirmed.
Cambridgeshire County Council	Odour	Acceptability for Planning policy of retention of ventilation shaft located at the existing Cambridge WWTP. Planned odour controls sought in Preliminary Odour management Plan	Reviewed within Technical Working Group meetings for further discussion.
Cambridgeshire County Council	DCO Order Traffic and transport	All works within the adopted public highway be agreed with the Applicant using section 278 of The Highways Act 1980.	The Applicant seeks that all works are agreed within the body of the protective provisions and therefore are clear on the face of the order.
The Conservators of the River Cam	Draft DCO	Powers required to deliver the project and how applied for within the DCO Disapplication of Byelaws within DCO and Protective Provisions sought for the protection of the Conservancy. Protective Provisions sought and Article 44 of the dDCO.	Meeting held on 18 January 2024 to fully review and discuss further. These are under discussion and a marked up version of the proposed Protective Provisions and amended Article 44 is included in that Deadline 5 submission

Stakeholder	Area of disagreement	Comment	Applicant's view on the matter and necessary actions
The Environment Agency (EA)	Flood Risk Assessment	The fluvial model provided to the Applicant dates from 2013 and that there have been no modifications to the model for the site-specific study.	It is anticipated that the reviewed and agreed FRA can then be available by Deadline 5. Modelling work shared with EA and confirmed acceptable. Further modelling to review impact to 2 residential properties and if any mitigation is necessary is now underway.
The Environment Agency	Industrial Emission Permit	IED Application submitted to EA in March 2023, and returned an enhanced preapplication process will identify appropriate next steps for the resubmission of the Application.	The Application is now submitted to the EA and in the enhanced pre-application process.
The Environment Agency	Biodiversity and river bank impacts	Minimising impacts to the grazing marsh and river bank and the final net gain calculation for those habitats are being considered. Environment Agency no further concerns on this point.	
The Environment Agency	CoCP	Appropriate mitigation methods to limit contamination or pollution of groundwater and surface watercourses to be set out in the CoCP.	Updates to CoCP and CEMP to be shared with EA to confirm they are adequate. Briefing note and discussion held on operational testing of Waterbeach pipeline on 19 January 2024 and best available techniques for pipelines and operational testing process. Agreement sought from Environment Agency.
The National Trust	Principal of Development and Green Belt Impact	The Trust's position on development in the Green Belt is that it must be carefully managed.	The Applicant set out in Section 6.2 of Planning Statement (App Doc Ref 7.5) the Very Special Circumstances case of the proposed development within the green belt, plus how the proposed development complies with national and local planning policies on development within the green belt.
The National Trust	Landscape and Ecology	Whilst Trust agrees the assessment approach in the submitted LERMP (App Doc Ref 5.4.8.14) it considers the proposals should extend to the entire project area and not just the proposed WWTP and should explore further in the context of the Wicken Fen Vision objectives.	Defer to the Local Authority to ensure the delivery of the LERMP is adequately secured within the Draft DCO.

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The National Trust	Hydrological Impact Assessment	Ensure that appropriate monitoring of water levels and water quality is in place before construction, during construction and during operation. On and off-site monitoring is required to determine impacts on sensitive receptors, including potential pathways to impact our sites.	Review of Outline Water Quality Monitoring Plan will be undertaken once agreed by the Applicant and the Environment Agency.
The National Trust	Recreation and PRoW	During pre-application discussions the Trust requested that the Applicant explore the possibility of extending the new bridleway along the dismantled railway route to make this connection to Anglesey Abbey and is disappointed that this cannot be achieved.	Not agreed that this is a suitable location for including this provision. The overall width of the bridge deck is insufficient to safely meet design requirements.
National Highways (NH)	Draft DCO (dDCO0)	Proposed Protective Provisions incorporated within the dDCO for the Protection of National Highways.	The Applicant included protective provisions for the benefit of NH within the draft Order submitted as part of the Application. These protective provisions had been shared with NH and were subject to negotiation between the parties. NH has now advised that they require the inclusion of their Standard Protective Provisions in the DCO rather than the set which were subject to previous negotiation. These standard protective provisions are currently being reviewed by the Applicant who continues to engage with NH in relation to the inclusion of these standard provisions and also in relation to the negotiation of a separate side agreement if required to include matters not covered by NH's Standard Protective Provisions.
National Highways	Management Plans		
	Construction Traffic Management Plan	Ensure satisfactory temporary signage, traffic marshalling in conflict zones during peak hour.	Agreed.
	Construction Workers Travel Plan	Aims to encourage construction workers to travel to and from the site via sustainable modes, minimise environmental impact and	Agreed.

Stakeholder	Area of disagreement	Comment	Applicant's view on the matter and necessary actions
		consider the safety and travel patterns of site workers.	
	Operational Workers Travel Plan	Seeks to reduce overall need to travel to the site, use sustainable modes of transport or reduce carbon emissions or single occupancy car travel.	
Historic England	Historic Environment	CHET and Greater Cambridge Conservation Officer, and the other local and district councils, need to be consulted throughout project.	A schedule of engagement will be agreed between these parties.
Natural England (NE)	Visitor pressure	Proposed measures for mitigation including signage/interpretation and alternative walking routes will effectively mitigate all the effects of additional development and make a significant contribution to existing pressures.	It is agreed this can be monitored and managed with the use of an Combined Recreational Advisory Group that includes other stakeholders and developers for the area. First meeting arranged for 24 January 2024.
Natural England	Agricultural Land and Soils	NE have reviewed the first outline draft of the Soil Management Plan, Baseline Agricultural Land Classification, Agricultural Impact Assessment and Soil Management Plan Appendix 6.1 -6.3 (App Doc Ref 5.4.6.1 - 5.4.6.3) and provided comments.	NE to review and provide final comments where agreed. Comments as presented in the Relevant Representations from Natural England for further discussion. Natural England comments on SMP with Applicant for review.
Natural England	CoCP	It is agreed that mitigation measures in the CoCP will control and prevent the discharge of silt into field boundary ditches and the Black Ditch.	Agreed.
Natural England	Proposed Environmental Quality Monitoring (Water)	The ground water monitoring plan, to be added to the dDCO Application to set out the scope and duration of monitoring of groundwater and related surface water features in connection with the construction, operation, and maintenance of the CWWTPR.	The Environment Agency have confirmed their agreement to the Water Quality Monitoring Plan. Natural England have provided comments to the Applicant on the final version.
Natural England	Air Quality/ Noise/Lighting	The Parties agree that significant air quality effects from traffic emissions are not anticipated for ecological receptors.	There will be a final review of DCO Application documentation.

Stakeholder	Area of disagreement	Comment	Applicant's view on the matter and necessary actions
Save Honey Hill Group	Law and Policy	The legal and policy framework for decision making.	In support of the submission, the Applicant refers to paragraph 1.3 and 1.5 of The National Policy Statement for National Networks.
Save Honey Hill Group	Need for the project	The need for relocation of the CWWTP.	Need for proposed WWTP relocation is described in section 2.1 of the Planning Statement, App Doc Ref 7.5)
Save Honey Hill Group	Alternatives	The inadequacies in assessment of alternatives.	In Paragraphs 6.2.6 to 6.2.12 of the Planning Statement (App Doc Ref 7.5, detail the assessment of sites, the suitability of the chosen site, and outlines the lack of alternative sites available. The site selection and consideration of alternatives is also summarised ES Chapter 3 Site Selection and Alternatives (App Doc Ref in application document 5.2.3).
Save Honey Hill Group	Development Plan	The application is contrary to policy in the NPPF, the adopted and emerging local plans.	A review of compliance with national and local planning policy is presented in Planning Statement (App Doc Ref 7.5 and Planning Statement NPSWW Accordance Table (App Doc 7.5.1).
Save Honey Hill Group	Green Belt	The impact of the proposal on the Green Belt.	The Applicant set out in Section 6.2 of Planning Statement (App Doc Ref 7.5) the Very Special Circumstances case of the proposed development within the green belt, plus how the proposed development complies with national and local planning policies on development within the green belt.
Save Honey Hill Group	Design, Engineering and Landscape Concerns	The impact of the proposal on character and appearance, including design and landscape impact.	The assessment of effects on landscape character and proposed mitigation measures are presented in the ES, Chapter 15 - Landscape and Visual Amenity (App Doc Ref application document 5.2.15)
Save Honey Hill Group	Carbon	The carbon footprint of the Proposed Development.	The ES Chapter 10 - Carbon (App Doc Ref 5.2.10) provides an assessment of carbon emissions and proposed mitigation measures for the decommissioning of the existing facility and construction of the Proposed Development.
Save Honey Hill Group	Environmental Effects, Mitigation and Harm	The environmental harm which will result from the development.	The Applicant 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

Stakeholder	Area of disagreement	Comment	Applicant's view on the matter and necessary actions
			to provide alternative photomontages as part of the visual impact assessment.
Save Honey Hill Group	Funding and Deliverability	The funding and deliverability of the Development Consent Order.	The 3.2 Funding Statement (App Doc Ref 3.2), Planning Statement (App Doc Ref 7.5) and dDCO order (App Doc Ref 2.1) all address this area.
Save Honey Hill Group	Overall Planning Balance	The overall planning balance that the Examining Authority will be required to undertake.	Planning Statement (App Doc Ref 7.5) and dDCO order (App Doc Ref 2.1) address this area.
Save Honey Hill Group	DCO Provisions	The content of the draft DCO and requirement.	dDCO order (App Doc Ref 2.1) all address this area.
SLC Rail	Access to site and within site	SLC Rail are reviewing (with SCDC) the potential to utilise a haul road for construction period that is not via Waterbeach village nor via Bannolds Drove but is accessed from the north of the site, from the Waterbeach New town development site itself.	Position now agreed save for amendment to signatory of the SoCG to reflect the contractual relation between SLC Rail and the Greater Cambridge Partnership.
South Cambridgeshire District Council	Alternative site	Removed as per ISH3. Agreed	
South Cambridgeshire District Council	Landscape and Visual	Do not agree that the selected design for the project is reflective of the local landscape.	For further review and discussion in Examination.
South Cambridgeshire District Council	Proposed approach to PRoW	It would be beneficial to include equestrian access as part of the new circular route proposed to include equestrian access across the non-motorised user section of the Horningsea bridge.	It is agreed that provision for Equestrians will be managed with the amendment to the current highway design proposals for parapet for the A14 overbridge to be increased to 1.8m for the benefit of equestrians.
South Cambridgeshire District Council	Site access	Removed as per ISH3. Agreed	
South Cambridgeshire District Council	Waterbeach Station access	Alignment of Waterbeach new station development	The applicant is in discussion with SCDC in order to ensure there is no conflict with the delivery of the Waterbeach pipeline and the Waterbeach Station access which is the subject of other Planning Applications being submitted to SCDC.

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Waterbeach Development Company	Access to site and within site	Applicant to review the traffic management plans when they are submitted by WDC to SCDC and their proposed enabling work to ensure appropriate measures and mitigation are undertaken in the event that the Applicant's proposed construction programme for the Waterbeach pipeline overlaps with the preliminary works on the terminal pumping station.	Further dialogue is sought to ensure there are no conflicts within the area in proximity to the new station.
UKPN	Extent of easement requirements needed within private land and final cable route	Extent of easement requirements needed within private land and final cable route are ongoing discussion.	Extent of easement requirements needed within private land and final cable route are an ongoing discussion.
UKPN	Protective Provisions	The Protective provisions sought by UKPN are the subject of ongoing discussion between the Parties legal representation.	The Protective provisions sought by UKPN are the subject of ongoing discussion between the Parties legal representation. UKPN to review revised DCO and updated Protective Provisions for Deadline 2.

Source: Individual Statements of Common Ground

Get in touch

You can contact us by:



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



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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/>