

Cambridge Waste Water Treatment Plant Relocation Project
Anglian Water Services Limited

Statement of Common Ground: South Cambridgeshire District Council

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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 (“Anglian Water”) and (“the Applicant”) for a Development Consent Order under the Planning Act 2008 (“the Application”) for the Cambridge Waste Water Treatment Plant (CWWTPR).

~~1.1.1~~1.1.2 The Application is for the provision of a new modern, low carbon waste water treatment plant for Greater Cambridge. The project is an enabler of sustainable growth. The relocation of the existing works, from its current site, will unlock the last large brown field site in Greater Cambridge and allow the creation of a new city district and provide much needed housing and commercial space in a sustainable location, with access to transport, jobs and recreational opportunities.

~~1.1.2~~1.1.3 This ~~SoCG Statement of Common Ground~~ has been prepared by the Applicant Anglian Water and agreed with South Cambridgeshire District Council (SCDC). SCDC is a statutory consultee for the project. This Statement of Common Ground confirms the position of these two parties to their agreement or otherwise on CWWTPR Application.

~~1.1.3~~1.1.4 To date, SCDC have provided views on draft proposals at different phases of consultation of the design development.

~~1.1.4~~ This Statement of Common Ground has been prepared by Anglian Water and agreed with SCDC.

1.1.5 In this SoCG, reference to ‘the parties’ means the Applicant ~~Anglian Water~~ and SCDC.

1.1.6 This SoCG has been prepared to identify matters agreed, still in discussion and matters currently outstanding between ~~the parties~~ Anglian Water and SCDC.

1.2 Approach to the SoCG

1.2.1 The SoCG will evolve as the DCO application progresses to submission and through examination. It is structured as follows.

- Section ~~1~~ confirms the pre-application consultation undertaken to date between the Applicant ~~Anglian Water~~ and SCDC.
- Section ~~3~~2 identifies the relevant documents on which the agreements recorded in this SoCG were reached.
- Section ~~4~~3 provides a summary of matters that have been agreed, are still in discussion and not agreed.
 “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 **54** 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.

1.2.2 This SoCG relates to the following topics;

(i) Strategic Development Plan Context - ~~Development Plan Context~~

- History of the North East Cambridge area
- Extant Development Plan Context
- Emerging Development Plan Context
- Extent to which housing needs could be met without the relocation of the CWWTP
- Progressing the emerging Development Plans
- Significance of North East Cambridge to the Cambridge Economy
- Government’s Cambridge 2040 initiative
- Summary of the Planning Benefits of DCO Proposal

(ii) Green Belt Policy

- Very Special Circumstances

(iii) Landscape

(iv) Historic Environment

(v) Carbon

(vi) Ecology and Biodiversity

(vii) Land Quality and Contamination

(viii) Odour Impacts

(ix) Air Quality Impacts

(x) Noise and Vibration

(xi) Lighting

(xii) Public Health

(xiii) Community Impact

(xiv) Public Rights of Way

(xv) Highways and Transportation

(xvi) Climate Resilience

(xvii) Other Matters

- Waterbeach New Station
- Site Selection – Alternatives

- ~~Benefits of the DCO Application and Project~~
- ~~Alternatives~~
- ~~NPPF and Green Belt Policy~~
- ~~Biodiversity (ES Chapter 8) [Doc ref 5.2.8]~~
- ~~Climate Resilience (ES Chapter 9) [Doc ref 5.2.9]~~
- ~~Carbon (ES Chapter 10) [Doc ref 5.2.10]~~
- ~~Community (ES Chapter 11) [Doc ref 5.2.11]~~
- ~~Health (ES Chapter 12) [Doc ref 5.2.12]~~
- ~~Historic Environment Chapter 13 (Doc Ref 5.2.13)~~
- ~~Landscape and Visual Amenity (ES Chapter 15) [Doc ref 5.2.15]~~
- ~~Air Quality (ES Chapter 7) [Doc ref 5.2.7]~~
- ~~Odour (ES Chapter 18) [Doc ref~~
- ~~Lighting (ES Chapter 15)) [Doc ref 5.2.15]~~
- ~~Noise & Vibration (including Construction) (ES Chapter 17) [Doc ref 5.2.1~~
- ~~Traffic & Transport (ES Chapter ES chapter 19) [Doc ref. 5.2.19]~~

1.3 Status of the SoCG

1.3.1 This version, Version 2 of the SoCG represents the position between the Applicant Anglian Water and SCDC as of 27 September 2023, 19 January 2024 (covering the pre-application and pre-examination stage of the process). The SoCG will continue to be reviewed and progressed through Examination as well as any actions arising from the Issue Specific Hearings on the draft DCO.

1.3.2 A Principle 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.

~~1.3.1 A Statement of Commonality on specific points between SoCG's will be updated and submitted to the Examining Panel during the examination to reflect additional agreement achieved.~~

2 Consultations and engagement

2.1.1 The Applicant has engaged with SCDC in a series of meetings within a Technical Working Group forum and in one to one meetings on specific issues. The Parties also meet on a monthly basis to review programme, specific topics and engagement requirements. The record of this engagement is set out in Appendix 1.

3 Documents considered in this SoCG

~~3.1.1~~ In reaching common ground on the matters covered in this SoCG, at this point in time, the parties have considered and make reference to the documents listed against the topics above and to the draft the Management Plans and DCO Work and is updated to reflect submissions made in Relevant Representations and the Local Impact Report [add doc references]. ~~Plans along with information presented at the Technical Working Group meetings.~~

4 Summary and Status of Agreement

4.1 Strategic Development Plan Context

- 4.1.1 — ~~The relevant Development Plan and the local policy context relevant to the Proposed Development is set out in Section 2.3 of the Planning Statement (AS-128) and Section XX of the LIR (Doc Ref) and is agreed in substance but not necessarily in presentation (eg where comment and interpretation is provided).~~
- 4.1.2 — ~~The Local Plan Policy Compliance Table attached at Appendix 2 identifies the relevant local policies and includes an assessment of the compliance of the Proposed Development with those policies so far as agreed between the parties.~~
- 4.1.3 — ~~The emerging North East Cambridge Area Action Plan (NECAAP) is being prepared in accordance with the requirement set out in Policy 15 of the adopted Cambridge City Local Plan 2018 and has progressed to a stage where the City Council and District Council have approved a Proposed Submission Regulation 19 version of the NECAAP which makes provision (Policy 1) for NEC to accommodate 8,350 new homes (3,900 in the period to 2041) and 15,000 new jobs, predicated on the relocation of the existing WWTP. Public consultation on the Proposed Submission Regulation 19 version of the NECAAP must await the outcome of this DCO application. Nevertheless, it is agreed between the parties that, given the detailed studies undertaken to date on the suitability and capacity of NEC to accommodate development, that the draft NECAAP is an important and relevant matter in the determination of the DCO application to which substantial weight should be given.~~
- 4.1.4 — ~~The status of the emerging Greater Cambridge Local Plan (GCLP) is set out in Section 2.3 of the Planning Statement (AS-128) and Section XX of the LIR (Doc Ref). The last update provided to Cambridge City Council and South Cambridgeshire District Council members was in January/February 2023 when a Development Strategy Update (Regulation 18 Preferred Options) report which drew on representations to the GCLP First Proposals consultation held in 2021 and evidence completed since then, was presented to members who confirmed (at South Cambridgeshire District Council Cabinet on 6 February 2023) a clear position on NEC as one of three key strategic sites which will form “central building blocks of any future strategy for development” in the next GCLP Draft Plan (Regulation 18) consultation. It is agreed between the parties that this is also an important and relevant matter in the determination of the DCO application to which weight should be given.~~
- 4.1.5 — ~~The continued inued water supply issues causes the delay to the progression of the preparation of the Greater Cambridge Local Plan (GCLP), which will replace both the adopted Cambridge and South Cambridgeshire Local Plans 2018 and cover the period to 2041, and the implications of current delays to the GCLP programme on the planning considerations relevant to the DCO application. ont~~

- ~~4.1.6 Current questions over water supply are frustrating further progression of the GCLP, but long term measures to resolve this issue (including through the delivery of new reservoirs and other measures proposed in the draft WRMPs) have been identified which will enable the strategic sites (including North East Cambridge) to come forward.~~
- ~~4.1.7 Resolution of the water supply issue without risk of significant changes to the spatial development strategy for homes and jobs in the emerging GCLP (specifically the three key strategic sites) can be confidently presumed given the initiatives announced by the Prime Minister and the Secretary of State for Levelling Up, Housing and Communities on 24 July 2023 and given that these sites are still some way away from delivery (for example, in the case of NEC and East Cambridge, because of the need for relocation of existing activity until the late 2020s/early 2030s) such that, even if the resolution of the problem cannot be accelerated, there can be confidence that new housing to meet Greater Cambridge’s requirement can come forward with the new reservoir in place.~~
- ~~4.1.8 In respect of the water supply issue, and for the avoidance of doubt, the Environment Agency has not raised the issue of water supply in relation to the DCO and in its relevant representation it states:~~
- ~~*The proposed new facility is replacing the existing works so no additional demand to the water supply will be made.*~~
- ~~4.1.9 In the circumstances set out above, it is agreed between the parties that delays to the GCLP do not materially affect the case for CWWTPR as presented in the DCO application.~~

Table 4.1: Details of the summary and status of agreement on Development Plan Context

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
List of relevant policies	See Planning Statement [REP1-049] Appendix 5 for a list of the relevant Development Plan policies.	SCDC agrees with the list within the Applicant’s Planning Statement [REP 1-049]	low
Local Plan Policy Compliance Table	See Planning Statement – Local Policies Accordance Table [REP1-054].	The Local Polices accordance table [REP1-051]	low
History of the North East Cambridge area	See Planning Statement [REP1-049] Section 2.	For over 20 years the existing CWWTP site and surrounding area has been promoted through consecutive statutory planning policy documents for redevelopment, to	

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
		<p>make the most of the Greater Cambridge area’s sustained economic growth and, more recently, the significant investment in sustainable transport provision that serves the North East Cambridge area.</p> <p>As set out in the LIR (para 6.5), a document capturing the Chronology of the investigations into the feasibility of redevelopment of the Cambridge Waste Water Treatment Plant site (November 2021) [LIR Appendix 1, GCSP-18] is a supporting document for the emerging North East Cambridge Area Action Plan (see Emerging Development Plan Context section below). It shows the long history of consideration of the site of the existing plant and the surrounding underutilised brownfield area.</p> <p>This confirms the series of development plans that have sought to redevelop the CWWTP and surrounding land as an integral part of the development strategy for the Cambridge area. It has not been possible to capitalise on the locational and sustainable transport benefits of the site over that period as various studies concluded that it was not financially viable. The HIF funding</p>	

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
		<p>secured in 2019 is a game changer and overcomes the viability constraint. As such, the emerging NECAAP and GCLP include the NEC site as a key part of the development strategy for the area, subject to the DCO being approved. See LIR paras 6.4-6.24.</p>	
<p>Extant Development Plan Context for the existing CWWTP site</p>	<p>See Planning Statement [REP1-049] Appendix 5 for a list of the relevant Development Plan policies, and paragraphs 2.3.7 to 2.3.11.</p>	<p>The relevant policies in the extant development plans are South Cambridgeshire Local Plan 2018, Policy SS/4 and Figure 6 and Cambridge Local Plan 2018, Policy 15 and Figure 3.3. These are mirror policies in each plan and each figure shows the whole of the Cambridge Northern Fringe area across both Councils' areas. The policies envisage the creation of a 'revitalised, employment focussed area centred on a new transport interchange'. They allocate the area for high quality mixed-use development, primarily for employment use as well as a range of supporting uses, commercial, retail, leisure and residential uses (subject to acceptable environmental conditions). They state that the amount of development, site capacity, viability, timescales and phasing of development will be established through the preparation of an Area Action Plan for the site prepared jointly by the two Councils. See LIR paras 6.25-6.27.</p>	

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
Emerging Development Plan Context			
Proposed Submission North East Cambridge Area Action Plan (NECAAP)	See Planning Statement [REP1-049] paragraphs 2.3.12 to 2.3.20.	<p>A Proposed Submission AAP (Regulation 19) has been agreed by the Councils for future public consultation, subject to the DCO for the relocation of the CWWTP being approved. The AAP allocates the wider NEC area for a new city district providing approximately 8,350 new homes, 15,000 new jobs and new supporting infrastructure. See LIR paras 6.29-6.34.</p>	
Emerging Greater Cambridge Local Plan (GCLP)	See Planning Statement [REP1-049] paragraphs 2.3.21 to 2.3.36.	<p>The emerging GCLP incorporates the proposals contained in the NECAAP through the proposed allocation of North East Cambridge within the spatial strategy for Greater Cambridge in the First Proposals (Reg 18) 2021 (proposed Policy S/NEC) [LIR Appendix 1, GCSP-5 and Appendix 1, GCSP-5a], having tested the merits of the location as part of the process of identifying the preferred development strategy. The emerging GCLP and its supporting evidence show the highly sustainable locational merits of the NEC area for a new residential-led City district. The area proposed to be allocated in the emerging Greater Cambridge Local Plan is the same as that covered by the NECAAP. The process tested a wide range of strategic</p>	

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
		<p>locations through a range of evidence and concluded that NEC is the most sustainable location for development in Greater Cambridge. A Development Strategy Update in January 2023 confirmed that NEC should form a central building block for any future strategy for development for Greater Cambridge and was confirmed by the Councils for inclusion within the emerging GCLP. See LIR paras 6.50-6.63 and 6.72-6.77.</p>	
<ul style="list-style-type: none"> Implications of Water Supply, including for Plan timetables 	<p>See Planning Statement [REP1-049] paragraph 2.3.30 to 2.3.36.</p>	<p>There remains uncertainty over the ultimate level of development that can be served with a sustainable water supply, it is anticipated that there should be a conclusion to the Water Resource Management Plan (WRMP) being prepared by Cambridge Water around the end of 2023. If there is a further delay, it is considered that a resolution is likely to be achieved by the end of the DCO examination process. Whilst there are delays to the emerging Local Plan process, it is not anticipated that the water supply situation would delay taking forward the Proposed Submission NECAAP following the conclusion of the DCO process. See LIR paras 6.64-6.71.</p>	
<p>Extent to which housing needs could be met without the relocation of the CWWTP</p>	<p>See Planning Statement [REP1-049] Section 2.1 and Applicant's Comments on South</p>	<p>If the DCO were not approved or if for any other reason the release of CWWTP does not occur, this would mean that the long-sought</p>	

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
	Cambridgeshire District Council Deadline 2 submission [REP-XXX] 2.3.1, page 64.	<p>regeneration of North East Cambridge would remain undeliverable, and the local plans would be further delayed. The Councils would therefore necessarily have to go back through the process of considering the available broad locations for development that performed next best against the guiding principles. There would be a need to identify and allocate other strategic scale site(s) within Greater Cambridge to meet the area's need for housing and employment, so far as is possible within infrastructure constraints, including water supply and housing deliverability considerations. on the basis of the evidence available to the District Council at this time, the alternative locations to North East Cambridge that could be available to meet the Councils development needs are all less sustainable in transport terms and the carbon emissions arising. it is not the Councils' position that active alternatives to the North East Cambridge scheme have been or are being identified. See LIR paras 6.78-6.82.</p>	
Progressing the emerging Development Plans			
Housing Trajectory on the CWWTP site in the emerging NECAAP and	The draft NEECAAP makes provision for the NEC to accommodate 8,350 new homes, 15,000 new jobs, and the provision of	<p>The housing trajectory in the Proposed Submission draft of the NECAAP indicates 1,900 homes coming forward on the Applicant</p>	

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
Local Plan	various community, cultural, and open space facilities in NEC. Of the 8,350 new homes, approximately 5,400 is expected to be delivered on the existing CWWTP site.	<p>The Applicant the Anglian Water and City Council owned land over the plan period 2020 – 2041, out of a total of 5,500 homes on that land. All these homes are on land enabled by the relocation of the CWWTP. The housing trajectory in the emerging GCLP follows the approach in the NECAAP. See LIR paras 6.84-6.89.</p>	
Degree of certainty that the NECAAP and emerging Local Plan would be found sound and adopted and timescales for this	See Planning Statement [REP1-049] paragraph 2.3.12 to 2.3.36.	<p>The Proposed Submission NECAAP has already been approved by both authorities and would be advanced, following a further health check, to publication and submission for examination if the WWTP DCO is approved. Objections to the principle of development will largely fall away if the DCO is approved. The independent examination process is the appropriate forum through which to debate any site-specific concerns, and the Councils will be directed by the appointed Planning Inspector to make such changes as may be required to make the final NECAAP sound and capable of formal adoption. See LIR paras 6.90-6.94.</p>	
Degree of certainty for redevelopment of existing CWWTP site	See Planning Statement [REP1-049] paragraph 2.3.12 to 2.3.36.	<p>The Applicant Anglian Water and the City Council have appointed a master-developer to bring forward a planning application for redevelopment of the existing CWWTP site. The Greater Cambridge Shared Planning</p>	

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
		<p>Service has recently commenced pre-application discussions with the master-developer team and a Planning Performance Agreement has been entered into. Members of both Councils have continued to reiterate their clear desire to see the regeneration of the NEC area. See LIR paras 6.95-6.97.</p>	
<p>What could be achieved in North East Cambridge if the CWWTP remains in situ</p>	<p><u>If the CWWTP were to remain its in existing location, the full NEC development would not be delivered and therefore, fewer homes and jobs would be created.</u></p> <p><u>See Planning Statement [REP1-049] paragraph 2.3.20.</u></p>	<p>Consolidation of the Cambridge Water Recycling Centre within Cambridge to provide a new treatment plant facility on the current site was considered as part of the business case supporting the HIF bid, which concluded that without the potential for housing, any redevelopment would not attract HIF type funding, and this would render a consolidation option unviable. Only three land parcels providing for residential development in the NECAAP lie outside the odour contours using Figure 1 from the 2020 updated Odour impact assessment as the worst-case scenario for what could take place with the CWWTP remaining in situ, totalling 1,425 dwellings. However, in the absence of the regeneration of the wider NEC area and the provision of a higher quality environment, it is uncertain whether the landowners would continue to support residential development in favour of other more suitable uses such as office and</p>	

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
		lab space. See LIR paras 6.34-6.35 and 6.98-6.101.	
Relationship between the ReWWTP DCO and the emerging development plans	<p>The progression of both the North East Cambridge Area Action Plan (NECAAP) and Greater Cambridge Local Plan (GCLP) are dependent on the WWTP being approved for relocation.</p> <p>See Planning Statement [REP1-049] paragraphs 2.3.12 to 2.3.36.</p>	<p>The Council considers there is an interdependence between this DCO application process and the development plan process in so far as that process relates to the proposed redevelopment of the site of the existing Cambridge Waste Water Treatment Plant (CWWTP) and the surrounding area. The emerging North East Cambridge Area Action Plan (NECAAP) and Greater Cambridge Local Plan (GCLP) are predicated on the relocation of the WWTP and can therefore only progress to Reg 19 consultation once there is evidence to demonstrate that the site is deliverable. The HIF provides evidence that the relocation is now viable after many years where this has not been the case. If the DCO is approved, that it will provide evidence that the relocation can take place to a suitable alternative site. In turn, the emerging NECAAP and GCLP provide evidence to the DCO process of the significant planning benefits that relocation of the WWTP will enable to be delivered. See LIR paras 6.1, 6.36, 6.72 – 6.77 and 6.102 – 6.106.</p>	
Weight to be given to emerging	A key part of the emerging development	While the Councils appreciate that the	

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
<p>development plans and how the Examining Authority should avoid prejudicing the outcome of the emerging Local Plan and AAP examinations when attributing weight to those documents</p>	<p>plans is to provide more homes and jobs across the Cambridgeshire district. Both the emerging GCLP and NECAAP emphasise the importance of the NEC in addressing these needs.</p> <p>See Planning Statement [REP1-049] paragraphs 2.3.12 to 2.3.36.</p>	<p>Proposed Submission draft of the NECAAP carries 'limited' weight in the determination of new planning applications under the Town and Country Planning Act 1990 coming forward within the NEC area, the Councils are of the opinion that the draft NECAAP can be given considerable weight as a matter that is both important and relevant to the DCO application. In particular, the draft AAP is being prepared in accordance with the adopted 2018 Local Plans policies, in that it establishes the "amount of development, site capacity, viability, timescales and phasing of development" as required of the preparation of an Area Action Plan for the site within the extant Local Plan policies. In this context, the AAP is less about the principle of redevelopment and more about consideration of the amount and type of development that could be realised should relocation of the CWWTP take place. Such considerations are informed by evidence base studies, community engagement, and responses to consultation. With respect to the emerging GCLP, the evidence supporting the local plan considers the locational merits of the NEC area against all other reasonable options and concludes it is the most sustainable location</p>	

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
		in Greater Cambridge for housing and employment development. See LIR para 6.107-6.110	
Significance of North East Cambridge to the Cambridge Economy	<p><u>NEC is a key strategic site in the Cambridgeshire area. It is a highly sustainable location and the relocation of the WWTP will provide the opportunity for 8,350 homes to be delivered alongside the creation of 15,000 new jobs, and provision of various community, cultural, and open space facilities in NEC.</u></p> <p><u>See Planning Statement [REP1-049] Sections 1.1, 2.1 and 2.2.</u></p>	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 nationally significant Cambridge economy. See LIR paras 6.111-6.112.	
Government's Cambridge 2040 initiative	<p><u>Through the relocation of the WWTP, there will be an opportunity to develop the land it currently occupies for the NEC.</u></p> <p><u>See Planning Statement [REP1-049] Sections 1.1, 2.1 and 2.2.</u></p>	Government's Cambridge 2040 initiative recognises the significance of the Cambridge economy and in respect of NEC is seeking to accelerate the relocation of the WWRP (subject to planning permission), and unlock an entire new City quarter. See LIR paras 6.113-6.115.	
Benefits arising from vacation of the existing WWTP site	<p><u>A number of benefits will be provided.</u></p>	There is clear evidence through the emerging plan making processes in respect of the	

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
	See Section 4.2 and Table 4.3 below, and Planning Statement [REP1-049] Sections 2.1 and 2.2.	NECAAP and GCLP of the significant planning benefits that would be enabled by the relocation of the CWWTP site. See LIR paras 6.1, 6.29 – 6.33, 6.52 – 6.63 and 6.116.	

4.2 Benefits of the DCO Application and Project

- ~~4.2.1 The benefits of the DCO Application and Project are set out in the Planning Statement (App Ref Doc 7.5) as well as within the SCDC LIR [REP2-052].~~
- ~~4.2.2 The benefits arising from the Proposed Development are described at paragraphs 6.2.13 – 6.2.14 of the Planning Statement (Application document reference 7.5). These benefits fall under two headings and are summarised as follows:~~
- ~~i. Benefits arising from the vacation of the existing WWTP site~~
 - ~~ii. Operational and other benefits arising from the proposed WWTP~~
- ~~4.2.3 Decommissioning and release of the existing WWTP site will enable regeneration and the creation of a new district delivering 8,350 homes (40% affordable), 15,000 new jobs and a wide range of community, cultural and open space facilities (including a community garden and food growing spaces, indoor and outdoor sports facilities) on a brownfield site within the urban area of Cambridge.~~
- ~~4.2.4 Specifically, relocation will deliver a 42 hectares brownfield site for redevelopment and release a further 35 hectares of land currently constrained to general industrial and office use on an area of land forming the gateway between Cambridge North station and the Cambridge Science Park which is identified in the Regulation 19 version of the North East Cambridge Area Action Plan (NECAAP) as having the potential to provide:-~~
- ~~On the existing WWTP site – 5,500 new homes~~
 - ~~23,500 m² new business space~~
 - ~~13,600 m² new shops local services, community, indoor sports and cultural facilities~~

2 primary schools and early years centres and land safeguarded for 1 additional primary school if needed (and space set aside for a secondary school if needed)

On the surrounding area¹—2,850 new homes
 105,000 m² new business space
 5,000 m² re-provided business floorspace
 23,200 m² re-provided industrial, storage and distribution space (B2 and B8)
 Partial retention of existing commercial floorspace
 6,100 m² new shops, community and cultural facilities (including community centre and indoor hall, health facility and visual and performing arts hub)

4.2.5—The release of the existing WWTP site to enable the delivery of the regeneration benefits listed above is the rationale for this project. It will, however, deliver other benefits which are described at paragraphs 1.4.1—1.6.1, 2.2.1—2.2.17 and 6.2.13 of the Planning Statement (Application document reference 7.5). These can be summarised as:

4.2.6—**Environmental benefits** through the delivery of a new modern, low carbon waste water treatment facility:

- significantly reducing carbon emissions (from being operationally net zero and energy neutral)
- improving storm resilience (by making storm overflows and CSOs less likely to occur)
- improving the quality of recycled water returned to the River Cam (by reducing concentration in final treated effluent discharges of phosphorus, ammonia, total suspended solids and BOD)
- maximising public value and supporting the circular economy (by more efficiently and effectively recycling and re-using waste water in the interests of public health)
- restoring and enhancing the surrounding environment (by increasing biodiversity by a minimum 20% complementing local initiatives such as the Cambridge Nature Network and Wicken Fen Vision)
- substantially reducing the number of homes and properties which may potentially experience odour² (when compared to the equivalent area for the Proposed Development)

¹excluding the Cambridge Science Park which is beyond the surrounding 35 hectares of land covered by the existing Safeguarding Area

²Cambridge Water Recycling Centre: Comparative Odour Potential Assessment March 2014 shows extent of existing properties within 1.5 OU/m³ radius of 897m

~~4.2.7 — The commitment to higher energy efficiency, on-site renewable energy provision, high standards of design and sustainable transport measures are clear environmental benefits, representing a move towards a low carbon economy and promoting more sustainable means of travel. These are key objectives of the NPSWW and the NPPF and are environmental benefits that we consider should carry moderate weight.~~

~~4.2.8 — **Social benefits** through:~~

- ~~● improving access to the countryside (by the delivery of new paths and accessible open spaces)~~
- ~~● enhancing education (through the facilities provided in the Discovery Centre and increased access to the WWTP)~~
- ~~● enhancing recreational opportunities (formalising recreational access and providing wider connectivity through new and enhanced public rights of way)~~

~~4.2.9 — The provision towards new recreational space and enhanced public rights of way, while necessary to mitigate the impact of the development, would also be available to everyone in the local area. These are social benefits of the scheme which we consider should carry moderate weight.~~

~~4.2.10 — **Economic benefits** through:~~

- ~~● investment in construction and related employment for its duration~~
- ~~● increasing operational employment~~
- ~~● supporting planned population growth and urbanisation in Waterbeach (in water treatment terms)~~
- ~~● increasing operational resilience and flexibility to accommodate population growth projections plus an allowance for climate change into the 2080s in accordance with Anglian Water’s statutory duties and with capability to efficiently and economically expand within the WWTP site to accommodate anticipated flows into the early 2100s in support of the spatial development strategy for homes and jobs set out in the emerging GCLP and the ambitions set out in the recent announcement by the Prime Minister and the Secretary of State for Levelling Up, Housing and Communities on 24 July 2023³ to ‘supercharge’ Cambridge as Europe’s science capital.~~

³ <https://www.gov.uk/government/news/long-term-plan-for-housing>

Table 4.2: Details of the summary and status of agreement on the Benefits of the DCO Application and Project.

Statement/document on which agreement is sought.	AW Comments	SCDC Comment	Status
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<p>Planning Benefits</p>	<p><u>Decommissioning and release of the existing WWTP site will enable regeneration and the creation of a new district delivering 8,350 homes (40% affordable), 15,000 new jobs and a wide range of community, cultural and open space facilities (including a community garden and food growing spaces, indoor and outdoor sports facilities) on a brownfield site within the urban area of Cambridge.</u></p> <p><u>Specifically, relocation will deliver a 42 hectares brownfield site for redevelopment and release a further 35 hectares of land currently constrained to general industrial and office use on an area of land forming the gateway between Cambridge North station and the Cambridge Science Park which is identified in the Regulation 19 version of the North East Cambridge Area Action Plan (NECAAP) as having the potential to provide:</u></p> <p><u>On the existing WWTP site -</u></p>	<p>The Council recognises there are substantial planning benefits that would arise as a consequence of the development proposal, benefits that have been identified for over 20 years in Regional, Structure and Local Plans, but that have not been able to be delivered due to viability constraints. The HIF funding provides a once in a generation opportunity to address the viability issue that has prevented regeneration for decades. There is very little potential for regeneration of the CWWTP site and surrounding area of North East Cambridge Area without the relocation of the CWWTP. The District Council considers the benefits that would arise to be as set out in its LIR and as summarised at paras 6.116-6.119.</p>	
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Statement/document on which agreement is sought.	AW Comments	SCDC Comment	Status
	<ul style="list-style-type: none"> • <u>5,500 new homes</u> • <u>23,500 m2 new business space</u> • <u>13,600 m2 new shops local services, community, indoor sports and cultural facilities</u> • <u>2 primary schools and early years centres and land safeguarded for 1 additional primary school if needed (and space set aside for a secondary school if needed)</u> <p><u>On the surrounding area -</u></p> <ul style="list-style-type: none"> • <u>2,850 new homes</u> • <u>105,000 m2 new business space</u> • <u>5,000 m2 re-provided business floorspace</u> • <u>23,200 m2 re-provided industrial, storage and distribution space (B2 and B8)</u> <p><u>Partial retention of existing commercial floorspace</u></p>		

<p>Environmental Benefits</p>	<p><i>Environmental benefits</i> through the delivery of a new modern, low carbon waste water treatment facility:</p> <ul style="list-style-type: none"> • significantly reducing carbon emissions (from being operationally net zero and energy neutral) • improving storm resilience (by making storm overflows and CSOs less likely to occur) • improving the quality of recycled water returned to the River Cam (by reducing concentration in final treated effluent discharges of phosphorus, ammonia, total suspended solids and BOD) • maximising public value and supporting the circular economy (by more efficiently and effectively recycling and re-using waste water in the interests of public health) • restoring and enhancing the surrounding environment (by increasing biodiversity by a minimum 20% complementing local initiatives such as the 		
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Statement/document on which agreement is sought.	AW Comments	SCDC Comment	Status
	<p>Cambridge Nature Network and Wicken Fen Vision)</p> <ul style="list-style-type: none"> substantially reducing the number of homes and properties which may potentially experience odour⁴ (when compared to the equivalent area for the Proposed Development) <p>The commitment to higher energy efficiency, on-site renewable energy provision, high standards of design and sustainable transport measures are clear environmental benefits, representing a move towards a low carbon economy and promoting more sustainable means of travel. These are key objectives of the NPSWW and the NPPF and are environmental benefits that we consider should carry moderate weight.</p>		

⁴ [Cambridge Water Recycling Centre: Comparative Odour Potential Assessment March 2014 shows extent of existing properties within 1.5 OU/m3 radius of 897m](#)

Statement/document on which agreement is sought.	AW Comments	SCDC Comment	Status
<p>Social Benefits</p>	<p>Social benefits through:</p> <ul style="list-style-type: none"> • improving access to the countryside (by the delivery of new paths and accessible open spaces) • enhancing education (through the facilities provided in the Discovery Centre and increased access to the WWTP) • enhancing recreational opportunities (formalising recreational access and providing wider connectivity through new and enhanced public rights of way) <p>The provision towards new recreational space and enhanced public rights of way, while necessary to mitigate the impact of the development, would also be available to everyone in the local area. These are social benefits of the scheme which we consider should carry moderate weight.</p>		

<p>Economic Benefits</p>	<p><i>Economic benefits</i> through:</p> <ul style="list-style-type: none"> • investment in construction and related employment for its duration • increasing operational employment • supporting planned population growth and urbanisation in Waterbeach (in water treatment terms) • increasing operational resilience and flexibility to accommodate population growth projections plus an allowance for climate change into the 2080s in accordance with <u>the Applicant's Anglian Water's</u> statutory duties and with capability to efficiently and economically expand within the WWTP site to accommodate anticipated flows into the early 2100s in support of the spatial development strategy for homes and jobs set out in the emerging GCLP and the ambitions set out in the recent announcement by the Prime Minister and the Secretary of State for Levelling Up, Housing 		
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Statement/document on which agreement is sought.	AW Comments	SCDC Comment	Status
	and Communities on 24 July 20235 to 'supercharge' Cambridge as Europe's science capital.		
Operational Benefits			
Other Benefits			

SoCG ID	Statement/document on which agreement is sought.	Status	Comments
	Agreement on the benefits arising from vacation of the existing WWTP site	Low	Agree

⁵ <https://www.gov.uk/government/news/long-term-plan-for-housing>

4.3—Alternatives

- 4.3.1— The Alternatives chapter of the Environmental Statement (Volume 2 Chapter 3 Site Selection and Alternatives) describes the site selection process and the approach undertaken by the Applicant to refine the design of the proposed Cambridge Waste Water Treatment Plant Relocation Project (CWWTPRP) and the alternatives which have been considered as the CWWTPRP has developed. The site selection exercise concluded that there are no alternative sites suitable for the proposed development within the built-up area or outside of the Green Belt.
- 4.3.2— It is agreed that the applicant followed a thorough and systematic criteria based approach to both the initial identification of potential sites and to the final site selection and that this provides robust justification for why areas of search were identified and dismissed or taken forward. The final site selection was also the subject of comprehensive public consultation and engagement.
- 4.3.3— The North East Cambridge Area Action Plan (NECAAP) ‘Chronology’ report July 2021 provides a summary chronology of evidence prepared in the period between 1989 and 2021 which assessed the feasibility of regeneration of the CNFE/NECAAP area [add footnote to explain difference?] including consolidation or relocation of the Cambridge WWTP either on the current site or elsewhere. The chronology includes reference to the relevant development plans in place or being prepared at the time of those feasibility exercises, including the emerging NECAAP, shows that various studies conclude that consolidation of the Cambridge Water Recycling Centre within Cambridge City to provide a new treatment plant facility on the current site is not a feasible option. Following securing the HIF funding for the CWWTP relocation costs, it is confirmed that redevelopment of the WWTP area through relocating the WWTP off site is a viable proposition.
- 4.3.4— Section 4 ‘Area Action Plan and Reasonable Alternatives’ of the NECAAP Sustainability Appraisal November 2021 contains a description of the likely effects of the options for the overall development of the NEC site, having regard to different assumptions relating to the WWTP. Evidence supporting the emerging GCLP is clear that the NEC site is the most sustainable location for strategic scale development available within Greater Cambridge.
- 4.3.5— In the absence of the relocation of the WWTP, the NECAAP Sustainability Appraisal November 2021 acknowledges that “*whilst it may be possible that some individual proposals may still come forward.... opportunities would continue to be very limited in the vicinity of the*

~~WWTP in order to be compatible with the existing constraints. There would be no comprehensive redevelopment of the site and very limited opportunities for residential development”.~~

- 4.3.6 — ~~The consequences, therefore, of no relocation are likely to be a significant reduction in the potential delivery of homes in NEC contrary to the objectives currently contained within the emerging joint GCLP. Since the enlarged NECAAP area (from the adopted 2018 Local Plans) is a key component of future pipeline housing and other development supply in the new plan period to 2041, loss of the full development potential of this area is likely to have a significant effect on the ability to provide housing (and associated community and cultural facilities) in this area and prevent the achievement of the NECAAP aim to rebalance an employment-dominated part of Cambridge, achieving a sustainable mix of housing, work, retail and leisure and reducing the need to travel by exploiting its proximity to sustainable transport infrastructure including the guided busway, Cambridge North Station, cycling infrastructure and walking routes.~~
- 4.3.7 — ~~South Cambridgeshire District Council’s relevant representations (paragraph 25) recognise that “should the relocation of the CWWTP not occur, both the District Council and Cambridge City Council would have to try and identify and allocate other land within Greater Cambridge to meet the area’s strategic requirements for housing and employment”. Given that this exercise would need to align with the approach adopted to date for the development strategy in the emerging GCLP (ie to promote sustainability through provision of sustainable travel), the Councils acknowledge that “this would likely include consideration of other strategic locations, including the Edge of Cambridge in the Green Belt and New Settlements with high quality public transport connections to Cambridge”.~~
- 4.3.8 — ~~In the absence of other available sites capable of strategic scale development available within Greater Cambridge (which are not already part of the Councils’ spatial development strategy for homes and jobs being proposed through the emerging joint GCLP), this exercise is likely to result in the need to allocate land in significantly less sustainable locations, either beyond the Cambridge Green Belt or within it.~~

Table 4.3: Details of the summary and status of agreement on Alternatives.

SoCG-ID	Statement/document on which agreement is sought.	Status	Comments
	<p>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.</p>	<p>Medium</p>	

The feasibility studies conclude that consolidation of the Cambridge Water Recycling Centre within Cambridge City to provide a new treatment plant facility on the current site is not a feasible option.	Medium	
The consequences of no relocation are likely to be a significant reduction in the potential delivery of homes in NEC contrary to the objectives currently contained within the emerging joint GCLP.	Medium	
In the absence of other available sites capable of strategic scale development available within Greater Cambridge (which are not already part of the Councils' spatial development strategy for homes and jobs being proposed through the emerging joint GCLP), loss of the NEC for the delivery of new homes is likely to result in the need to allocate land in significantly less sustainable locations, either beyond the Cambridge Green Belt or within it.	Medium	
SCDC will defer to the Examining Authority to assess if the Application accords with the requirements of the EIA Regulations 2017.	Low	

4.4 **NPPF and Green Belt Policy** THIS SECTION (BLUE) IS STILL UNDER REVIEW BY SCDC]

4.3.94.4.1 Table 4.4: Details of the summary and status of agreement on Green Belt

<u>Statement/document on which agreement is sought.</u>	<u>AW Comments</u>	<u>SCDC Comments</u>	<u>Status</u>
<u>Planning Statement: Green Belt Assessment (App Doc Ref 7.5.3).</u>	<u>The Green Belt policy situation is set out in the Planning Statement (App Doc Ref 7.5). The policy requirement on Green Belt is as set out at Section</u>	SCDC's position in respect of Green Belt is set out in the LIR	

	<p><u>4.8 of the National Policy Statement for Wastewater March 2012 (NPSWW), chapter 13 of the National Planning Policy Framework (NPPF) and Policies 4 and S/4 respectively of the adopted Cambridge and South Cambridgeshire Local Plans 2018.</u></p> <p><u>Section 4 of the Planning Statement (Application document reference 7.5) assesses the Proposed Development against the policies set out in the NPSWW. In the context of the NPSWW policies relating to ‘Land Use’, and noting that a significant proportion of the project falls within Green Belt (as defined in the South Cambridgeshire Local Plan 2018), paragraphs 4.8.26 – 4.8.45 address the consistency of the Proposed Development to Green Belt policy which fundamentally aims to prevent urban sprawl by keeping land permanently open. Paragraph 4.8.18 of the NPSWW (which mirrors paragraph 137 of the NPPF) directs the decision maker to resist inappropriate development in the Green Belt except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.</u></p>		
<p><u>Compliance with National and Local Policy</u></p>	<p><u>The Green Belt purposes as set out in the NPPF are:</u></p>	<p><u>SCDC’s position in respect of policy compliance is set out in our LIR</u></p>	

- a) a) to check the unrestricted sprawl of large built-up areas;
- b) b) to prevent neighbouring towns merging into one another;
- c) c) to assist in safeguarding the countryside from encroachment;
- d) d) to preserve the setting and special character of historic towns; and
- e) e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

Paragraph 2.30 of the adopted South Cambridgeshire Local Plan sets out the particular purposes of the Cambridge Green Belt:

- Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;
- Maintain and enhance the quality of its setting; and
- Prevent communities in the environs of Cambridge from merging into one another and with the city.

Policies 4 and S/4 respectively of the adopted Cambridge and South Cambridgeshire Local Plans do not allow inappropriate development unless very special circumstances can be demonstrated. However, they do allow for appropriate development including engineering operations.

In accordance paragraphs 149 and 150 of the NPPE, the proposed woodland, hedgerows, tree planting, meadows and recreational routes shown on the landscape masterplan (within the LERMP Application Document Reference 5.4.8.14) do not comprise development and are not be considered to be inappropriate development. In addition, the following works are not considered to be inappropriate development within the Green Belt:

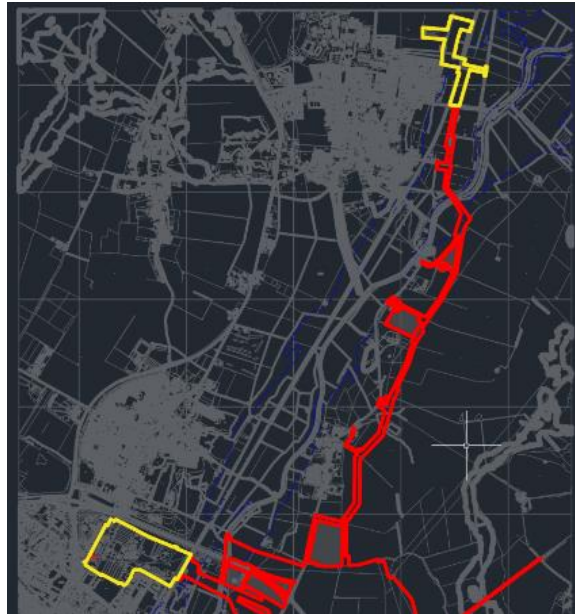
- The pipeline and connection infrastructure
- The discharging point substantially underground
- Access road (and small surface level car park)

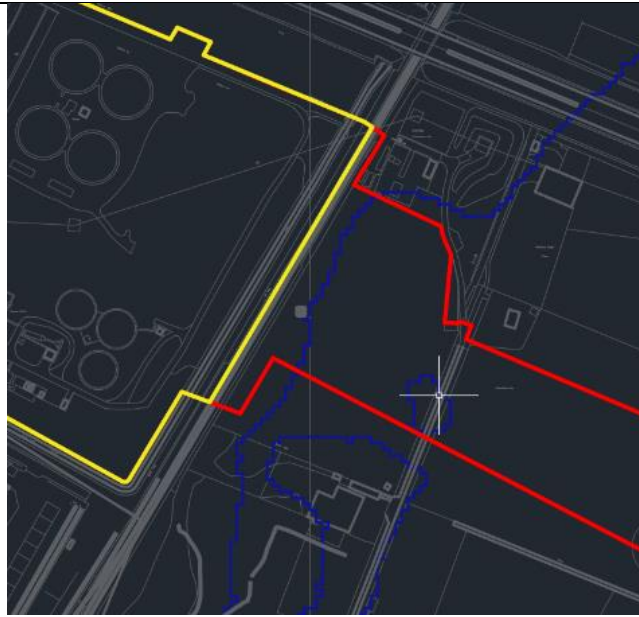
The proposed WWTP and surrounding earth bank (as a substantial structure in its own right) do not fall within the exceptions set out at NPPE paragraphs 149 and 150 and must, accordingly, be considered to be inappropriate development.

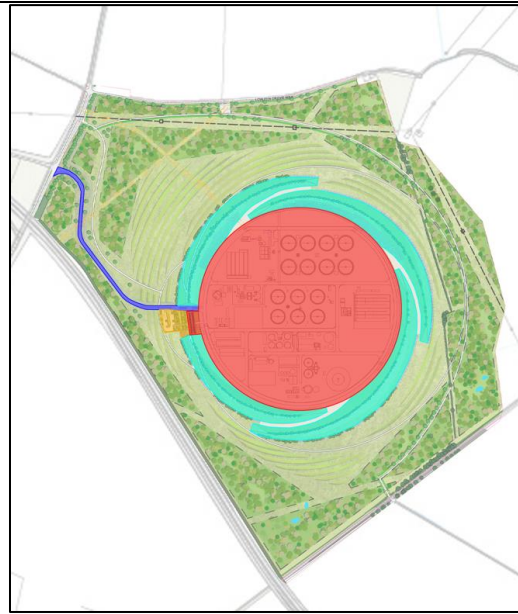
The total area of land contained within the Draft Order Limits is 209 hectares. The land at Milton west of the railway line and at Waterbeach north of Bannold Road totaling 48.1 hectares is outside the Green Belt boundary. The remaining 160.9 hectares is within the Cambridge Green Belt. The Proposed Development within this area is broken down as follows:

- Area of development inside the bund including the discovery centre (orange): 20.6ha
- Area of the earth bank (green):10.0ha
- Area of the car park and circulation area (yellow):0.4ha
- Area of the access road (blue): 0.5ha
- Area of Sewer Outfall (App Doc Ref 4.13.4 and 4.13.5): 0.0ha
- Remainder (for engineer works, pipeline, compounds, landscaping) 129.4

Total 160.9ha







Note: The habitat drawing in the DAS (App Doc Ref 7.6) shows gaps in earth bank as part of the area of calcareous grassland being primarily for ventilation.

~~4.3.10 The assessment of Green Belt is set out in Planning Statement: Green Belt Assessment (App Doc Ref 7.5.3).~~

~~4.3.111.1.1 The Green Belt policy situation is set out in the Planning Statement (App Doc Ref 7.5). The policy requirement on Green Belt is as set out at Section 4.8 of the National Policy Statement for Wastewater March 2012 (NPSWW), chapter 13 of the National Planning Policy Framework (NPPF) and Policies 4 and S/4 respectively of the adopted Cambridge and South Cambridgeshire Local Plans 2018.~~

~~4.3.121.1.1 Section 4 of the Planning Statement (Application document reference 7.5) assesses the Proposed Development against the policies set out in the NPSWW. In the context of the NPSWW policies relating to 'Land Use', and noting that a significant proportion of the project falls within Green Belt (as defined in the South Cambridgeshire Local Plan 2018), paragraphs 4.8.26 – 4.8.45 address the consistency of the Proposed Development to Green Belt policy which fundamentally aims to prevent urban sprawl by keeping land permanently open.~~

~~Paragraph 4.8.18 of the NPSWW (which mirrors paragraph 137 of the NPPF) directs the decision maker to resist inappropriate development in the Green Belt except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.~~

~~4.3.131.1.1 The Green Belt purposes as set out in the NPPF are:~~

- ~~a) to check the unrestricted sprawl of large built up areas;~~
- ~~b) to prevent neighbouring towns merging into one another;~~
- ~~c) to assist in safeguarding the countryside from encroachment;~~
- ~~d) to preserve the setting and special character of historic towns; and~~
- ~~e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land~~

~~4.3.14 Paragraph 2.30 of the adopted South Cambridgeshire Local Plan sets out the particular purposes of the Cambridge Green Belt:~~

- ~~• Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;~~
- ~~• Maintain and enhance the quality of its setting; and~~
- ~~• Prevent communities in the environs of Cambridge from merging into one another and with the city.~~

~~4.3.15 Policies 4 and S/4 respectively of the adopted Cambridge and South Cambridgeshire Local Plans do not allow inappropriate development unless very special circumstances can be demonstrated. However, they do allow for appropriate development including engineering operations.~~

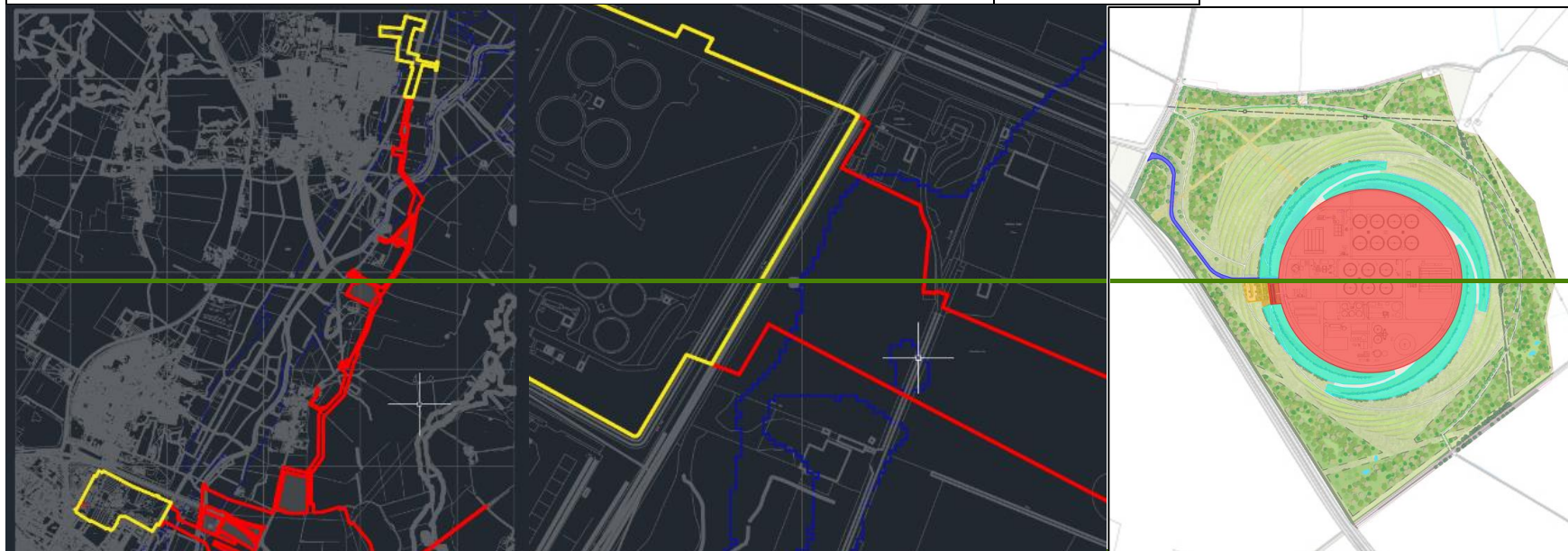
~~4.3.16 In accordance paragraphs 149 and 150 of the NPPF, the proposed woodland, hedgerows, tree planting, meadows and recreational routes shown on the landscape masterplan (within the LERMP Application Document Reference 5.4.8.14) do not comprise development and are not be considered to be inappropriate development. In addition, the following works are not considered to be inappropriate development within the Green Belt:~~

- ~~• The pipeline and connection infrastructure~~
- ~~• The discharging point substantially underground~~
- ~~• Access road (and small surface level car park)~~

4.3.17 The proposed WWTP and surrounding earth bank (as a substantial structure in its own right) do not fall within the exceptions set out at NPPF paragraphs 149 and 150 and must, accordingly, be considered to be inappropriate development.

The total area of land contained within the Draft Order Limits is 209 hectares. The land at Milton west of the railway line and at Waterbeach north of Bannold Road totaling 48.1 hectares is outside the Green Belt boundary. The remaining 160.9 hectares is within the Cambridge Green Belt. The Proposed Development within this area is broken down as follows:

	Area (ha)
Area of development inside the bund including the discovery centre (orange)	20.6
Area of the earth bank (green)	10.0
Area of the car park and circulation area (yellow)	0.4
Area of the access road (blue)	0.5
Area of Sewer Outfall (App Doc Ref 4.13.4 and 4.13.5)	0.0
Remainder (for engineer works, pipeline, compounds, landscaping)	129.4
Total	160.9



Note: The habitat drawing in the DAS (App Doc Ref 7.6) shows gaps in earth bank as part of the area of calcareous grassland being primarily for ventilation.

4.3.184.4.2 The tables below identify the harms and the benefits of the Proposed Development (paragraph numbers in brackets refer to relevant summary in the Planning Statement) and consider the weight that should be given to each in the exercise necessary to determine whether the benefits (and ‘other considerations’) “clearly outweigh” the harms sufficient for very special circumstances to exist.

4.3.194.4.3 The harms after mitigation arising from the Proposed Development (and the weight we consider should be given to them) are:

Harms	Comment	AW Weight	SCDC Comments
Water Quality, Resources and Flood Risk	<ul style="list-style-type: none"> Temporary harm to water resources from the potential short term increase in sediment content and localised increase in fluvial flood risk in the River Cam, and from the lowering of groundwater levels (4.2.22) 	Minor	<u>Weighting is not for SCDC as an interested party but for the ExA</u>
Biodiversity	<ul style="list-style-type: none"> Temporary harm on habitats (4.6.16) 	Moderate	<u>Weighting is not for SCDC as an interested party but for the ExA</u>
Landscape and Visual Amenity	<ul style="list-style-type: none"> Temporary and permanent landscape harm to the Eastern Fen Edge Chalklands LCA (4.7.17 and 4.7.20-4.7.21) and to a lesser degree to the River Cam Corridor LCA and Waterbeach-Lode Fen LCA diminishing over time Temporary and permanent harm to the visual amenity of local residents, users of local roads and users of public rights of way and other recreational routes (4.7.18 and 4.7.22 – 4.7.24) 	Moderate	<u>Weighting is not for SCDC as an interested party but for the ExA</u>
Land Use	<ul style="list-style-type: none"> Harm to farm businesses (4.8.8) Loss of BMV agricultural land (4.8.8) 	Minor	<u>Weighting is not for SCDC as an interested party but for the ExA</u>

<p>Green Belt (consistent with NPSWW para 4.8.18 and NPPF para 148)</p>	<p>The Proposal Development is inappropriate development in the Green Belt, which is harmful by definition (4.8.38). In addition there would be:</p> <ul style="list-style-type: none"> • Harm to the openness of the Green Belt - Moderate (4.8.41) • Harm to the purposes of including land in the Green Belt – Moderate (4.8.41) 	<p>Substantial</p>	<p><u>Weighting is not for SCDC as an interested party but for the ExA</u></p>
<p>Designated Heritage Assets</p>	<ul style="list-style-type: none"> • Indirect harm to the setting of Biggin Abbey (Grade II* listed)(4.10.13-4.10.14) • Indirect harm to Baits Bite Lock Conservation Area and Poplar Hall (4.10.20) • Harm from the partial or complete removal of archaeological remains 	<p>Less than Substantial</p>	<p><u>Weighting is not for SCDC as an interested party but for the ExA</u></p>
<p>Non-designated Heritage Assets (4.10.20)</p>	<ul style="list-style-type: none"> • Indirect harm to non-designated heritage assets (4.10.20) 	<p>Less than Substantial</p>	<p><u>Weighting is not for SCDC as an interested party but for the ExA</u></p>
<p>Socio Economic</p>	<ul style="list-style-type: none"> • Harm to navigation on the River Cam (4.13.7) 	<p>Minor</p>	<p><u>Weighting is not for SCDC as an interested party but for the ExA</u></p>

4.3.204.4.4 The benefits arising from the Proposed Development (and the weight we consider should be given to them) are:

Benefits	Comment	AW Weight	SCDC Comments
Water Quality, Resources and Flood Risk	Environmental benefits of improving storm resilience and improving water quality (2.2.17)	Substantial	<u>Weighting is not for SCDC as an interested party but for the ExA</u> <i>love every drop anglianwater</i>
Odour	Reducing the number of homes and properties within an area potentially affected by odour (6.2.13)	Moderate	<u>Weighting is not for SCDC as an interested party but for the ExA</u>
Biodiversity	Restoring and enhancing the surrounding environment (BNG) including creation of habitat to support the local Nature Recovery Network (2.2.17 and 4.6.19)	Substantial	<u>Weighting is not for SCDC as an interested party but for the ExA</u>
Public Health and Environmental Improvement (including Climate Change adaptation) (NPSWW paras 2.2.1-2.3.11, NIDP 1.20 and 9.1)	Delivering new waste water infrastructure and improving resilience and flexibility to support population and economic growth projections plus an allowance for climate change into the 2080s (2.2.15) and improving quality of life (3.8.9) Delivering the UK's obligations to reduce greenhouse gas emissions and climate change adaptation	Moderate	<u>Weighting is not for SCDC as an interested party but for the ExA</u>
Land Use	Assisting urban regeneration by removing a constraint to the most effective use of existing urban land and encouraging the recycling of urban land (4.8.44(e)) for housing (including affordable housing), economic and community uses on both the vacated site and constrained surrounding land Direct provision of new recreational space, enhanced public rights of way, improving access to the countryside and non-vehicle improvements to Horningsea Road (4.8.23, 4.11.10 and 4.13.9)	Substantial	<u>Weighting is not for SCDC as an interested party but for the ExA</u>

	Supporting forms of sustainable development		
Socio Economic	<p>Direct economic benefits of the CWWTPR development supporting a prosperous economy (4.13.7)</p> <p>Maximising public value and supporting the circular economy (2.2.17), including encouraging the optimum use of public transport and green travel infrastructure</p> <p>Enhancing education (2.2.17 and 4.13.13)</p> <p>Indirect economic benefits of delivering a vacant brownfield site for significant sustainable regeneration to support of economic growth in and around Cambridge (2.3.36)</p> <p>Indirect social benefits from the delivery of new schools, jobs, local services, community and other facilities and increased access to green spaces</p>	Substantial	<u>Weighting is not for SCDC as an interested party but for the ExA</u>
Carbon	Environmental benefits of significantly reducing carbon emissions (2.2.17 and 4.14.5)	Moderate	<u>Weighting is not for SCDC as an interested party but for the ExA</u>

Table 4.4: Details of the summary and status of agreement on NPPF and Green Belt Policy

Statement/document on which agreement is sought.	AW's comment	SCDC Comments	Comments <u>Status</u>
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Agreement on Green Belt Purposes			
Agreement on Areas inside and outside the Green Belt			
Agreement on appropriate and inappropriate development			
Agreement on the benefits and harm arising from the proposed development and the weight to be given to each			

4.44.5 Biodiversity

4.4.14.5.1 The Environmental Statement App Doc Ref 5.2.8 [\[REP-2007\]](#) identifies potential adverse impacts on ecological receptors and has been produced to demonstrate proposed mitigation and compensation as part of the project and is supported by the book of figures (App Doc Ref 5.3.8)

4.4.24.5.2 The Biodiversity Net Gain Assessment is set out in App Doc Ref 5.4.8.13 [\[AS-163\]](#).

4.4.34.5.3 The Habitats Regulation Assessment is provided at App Doc Ref 5.4.8.16. [\[REP2-024\]](#).

Table 4.5: Details of the summary and status of agreement on Biodiversity

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
<p><u>Assessment Approach</u> The assessment presented in ES Chapter 8 Biodiversity App Doc Ref 5.2.8 [REP2-007] including the data gathering methodology, baseline, scope of the assessment and the assessment methodology set out is appropriate.</p>	<p>The Approach has been agreed within Technical Working Groups between 11 March 2021 and 18 November 2021. Agreed.</p>	<p>SCDC is satisfied with the biodiversity methodology as set out in the Biodiversity Chapter of the ES [REP2-007]</p>	<p>Low</p>

<p><u>Biodiversity Net Gain (BNG)</u> The BNG report at App Doc Ref 5.4.8.13 and the outcome of the calculations for the measures habitat, hedgerow and river is appropriate.</p>	<p>Agreed</p>	<p>SCDC is satisfied with the biodiversity net gain assessment as set out in the ES Volume 4 Chapter 8 Appendix 8.13 BNG Assessment Report [REP2-020]</p>	<p>Low</p>
<p><u>River Units</u> The calculation of the biodiversity net gain and how this will be secured in the dDCO requires further assessment.</p>	<p>Under review within biodiversity TWG 2 October 2023 to agree calculations and proposals to secure delivery of river units. The Applicant has updated ES Appendix 8.13 Biodiversity Net Gain (BNG) Report (App Doc Ref 5.4.8.13 and submitted at Deadline 4 to reflect the inclusion of Requirement 25 within the dDCO (App Doc Ref 2.1).</p> <p>Pursuant to Requirement 25(4), the construction and operation of the authorised development must be carried out in accordance with the approved, updated report. Should the Applicant require a</p>	<p>A legal agreement will be required where the land used to provide the BNG offset is outside the order limits of the DCO through either (a) S106 will be between the Landowner and the local planning authority (likely to be Cambridgeshire County Council), or (b) Conservation Covenant with a responsible body.</p>	<p>Medium</p>

	<p>section 106 agreement in order to secure the delivery of biodiversity net gain, whether or not this contains an obligation to make a financial contribution, this will need to be provided as part of the submission of the updated biodiversity net gain report.</p> <p>The Applicant is continuing to explore off-site river unit opportunities. A record of the outcome of further discussions with off-site opportunities will be set out at Deadline 6.</p>		
<p>Further details and comments on Biodiversity Chapter 8 (App Doc Ref 5.2.8) Table 2-8 Appendix 8.4 Ornithology Baseline Technical Appendix, Appendix 8.8 Badger Technical Appendix Preliminary Ecological Appraisal</p>	<p>For review and further discussion.</p> <p>Documents submitted and shared with SCDC.</p>	<p>XX</p>	<p>Medium</p>

4.54.6 Climate Resilience

4.5.14.6.1 The assessment of the effects, and their significance, of climate change as it applies to the infrastructure that forms the Proposed Development and also considers in combination climate impacts on the wider environment and community is set out in Chapter 9 of the ES (App Doc Ref 5.2.9).

4.5.24.6.2 The Assessment of the parameters of the climate assessment is presented from a sustainable construction point of view.

Table 4.6: Details of the summary and status of agreement on Climate Resilience

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
<p>The assessment presented in Environmental Statement Climate Resilience Chapter [Doc. Ref. 5.2.9] [APP-041] <u>identifies the parameters of the climate assessment from a sustainable construction point of view in accordance with assessing</u> the use of the Institute of Environmental Management and Assessment (IEMA EIA Guide to Climate Change Resilience and adaptation 2020 and IEMA methodology for in combination climate impacts (ICCC). <u>is appropriate including the data gathering methodology, the Rochdale parameters, future baseline of 2090-2099, and the use of the two assessment methodologies for identifying risks in extreme weather on infrastructure and processes as well as the impact of the project on the environment and community.</u></p>	Agreed	The District Council has assessed the possible impacts identified in the Climate Resilience Chapter of the ES [Doc. Ref. 5.2.9] [APP-041] from a sustainable construction view (rather than a flooding or drainage), and therefore the District Council's comments focus on the receptor identified as physical infrastructure.	Low
<p><u>Mitigation Measures</u> The mitigation proposed within App Doc Ref 5.2.9 at para 2.8 are agreed.</p>	Agreed	The District Council notes that weather resilience measures for the construction phase have been outlined in Chapter 9 of the ES [Doc. Ref. 2.8.25] and it is important that these follow through into a Construction	Low

		Environmental Management Plan (CEMP) as the proposed development progresses	
Secondary Mitigation Measures focus on management plans and the monitoring of impacts and management of impacts during the operational phase. These management plans should be secured either by way of a requirement or within a section 106 Agreement.	Review how secondary mitigation measures will be secured. Detailed Construction Environment Management Plans (CEMP) to be prepared to align with the requirements of the Code of Construction Practice (CoCP) Part A (App Doc Ref 5.4.2.1) secured under Requirement 9	The District Council notes that weather resilience measures for the construction phase have been outlined in Chapter 9 of the ES [Doc. Ref. 2.8.25] and it is important that these follow through into a Construction Environmental Management Plan (CEMP) as the proposed development progresses	Medium
Decommissioning The scope of the assessment should include the construction and decommissioning.	Review paragraph 2.7 and table 2.8 App Doc Ref.	This applies to Cambridge City Council only.	
<u>Other requirements</u>	The Applicant has submitted a Design Code at Deadline 4 to demonstrate specifically for the attainment of BREEAM excellent The Design Code (App Doc Ref 7.17) is now submitted for SCDC to provide any further comment.	The District Council acknowledges that the focus of the ES is very much on the development of the operational structures of the wastewater treatment facilities, however it is important to ensure high standards for employee and other populated buildings. The District Council therefore considers that the following should be secured through requirements or be included in	

		<p>a single management plan to be sought through a requirement relating to sustainable construction measures:</p> <ul style="list-style-type: none"> • Optimum layout and orientation • Optimum fabric performance • Optimum use of the cooling hierarchy 	
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4.64.7 Carbon

4.6.14.7.1 This chapter presents the findings of an Environmental Impact Assessment (EIA) completed in relation to the potential carbon emissions generated by the Proposed Development.

4.6.24.7.2 The Assessment is set out in the Environmental Statement Chapter 10 (App Doc Ref 5.2.10).

4.6.34.7.3 An Outline is provided at Carbon Management Plan 5.4.10.2

4.6.44.7.4 The Planning Statement Strategic Carbon Assessment supports the Carbon chapter and carbon Management Plan and is set out at (App Doc Ref 7.5.2).

Table 4.7: Details of the summary and status of agreement on Carbon

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
The assessment presented in Environmental Statement Chapter 10 Carbon (App Doc Ref 5.2.10) assessing carbon emissions the use of	Agreed	The District Council is broadly satisfied with the approach to assessing carbon emissions and the use of the Institute of	Low

<p>the Institute of Environmental Management and Assessment (IEMA EIA Guide to assessing Greenhouse Gas Emissions and their significance (2022) and the parameters of the assessment at paragraph 2.6 of App Doc Ref 5.2.10, and the baseline options for assessing the carbon emissions are appropriate.</p>		<p>Environmental Management and Assessment (IEMA) EIA Guide to Assessing Greenhouse Gas Emissions and their significance (2022).</p>	
<p><u>The scope of the assessment</u> The implications of decommissioning should form part of the whole carbon assessment. An assessment of the whole life carbon impact of relating to future development of the site should be included.</p>	<p>Review in conjunction with Strategic Carbon Assessment. (App Doc Ref 7.5.2).</p>	<p>The parameters of the assessment, including capital carbon from construction, transport of materials and construction works, emissions from land use change as well as the operation of the proposed ReWWTP are considered to be reasonable.</p> <p>It is noted that construction, operational and decommissioning activities would generate in excess of 104tCO₂e over its lifetime. The District Council acknowledges that the net whole life emissions of the proposed development DCO preferred option, would lead to an estimated -32,330tCO₂e due to avoided emissions from export of gas to grid. The alternative DCO option using Combined Heat and Power (CHP) engines, is estimated to give net emissions of</p>	<p>Medium</p>

		<p>71,480tCO₂e, which clearly demonstrates the carbon emissions benefits of the proposed development preferred option (DCO).</p> <p>The District Council agrees with carbon emissions factors applied. It is acknowledged that there is a high level of uncertainty relating to future energy policy which affects the likely future baseline carbon intensity of national grid electricity and gas supplies.</p> <p>As a result, this can impact upon the projected emissions which would be avoided through the use of combined heat and power (CHP) and the export of biomethane to the grid, however the District Council agree that the information provided is a reasonable view based upon current known data.</p>	
<p><u>Mitigation</u> The securing of adequate mitigation measures to ensure future carbon reductions through later design stages and onsite construction activities is sought.</p>	<p>Review in conjunction with Carbon Management Plan App Doc Ref 5.4.10.2 and Requirement 21 of the dDCO.</p>	<p><u>Construction Mitigation -</u></p> <p>The District Council notes that the assessment demonstrates that carbon emissions from construction activities can be</p>	<p>Medium</p>

		<p>reduced by 48% when comparing the DM0 (Delivery Milestone Zero) baseline with the DCO preferred development. This is mainly achieved through a change in the sand filtration process and a reduction in the size of onsite facilities such as tanks, tunnels and roads, saving on the processing of raw materials. The Applicant has a target to achieve a 70% reduction, meaning a further 22% reduction, (equating to just over 21,000 tonnes of CO₂e), is still required. Secondary mitigating measures have been identified, such as:</p> <ul style="list-style-type: none"> • Continued innovation review; • Material specification, requiring low carbon intensity materials; and • Efficient construction <p>It is noted that such savings will be achieved during the later design stages, and it is therefore important in the District Council's view that the Code of Construction and future Construction Environmental Management Plan (ES Volume 4 Chapter 2, Appendix</p>	
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		<p>2.1) [Doc ref. 5.4.2.1, APP-068] and the whole life carbon assessment is updated as this detail becomes available.</p> <p><u>Operational Mitigation</u> The District Council notes that further measures to improve energy efficiency and generate renewable energy will be evaluated further at design stage. This includes the installation of a 7mW solar photovoltaic array.</p> <p>The District Council considers it is essential to ensure that the DCO provisions allow for a continual process of refinement of information and data to be provided to the District Council. As the scheme moves towards detailed design, the most accurate information should be made available to inform the development. This can be achieved through a requirement in the DCO.</p> <p>The District Council notes that mitigation will be controlled through the DCO and <u>DCO</u> and that</p>	
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		<p>further carbon reductions will be achieved through later design stages and onsite construction activities (e.g., 22% shortfall in construction phase target). As this is a continually evolving area in relation to design in light of uncertainty in future energy policy and the impact on future carbon intensities, it is considered that an outline of the timescales for monitoring, reviewing and updating the carbon emissions associated with this project should be provided to ensure the most accurate information is available to inform the development and ensure the scheme is meeting standards and targets in relation to carbon. The District Council considers this also should be reflected in a requirement.</p>	
<p><u>Requirements</u></p>		<ul style="list-style-type: none"> Decommissioning of the proposed ReWWTP has been excluded from the carbon assessment due to the long lifespan of the development. It is noted that there are no proposals for decommissioning 	

		<p>before 2050 making attempts to quantify carbon emissions associated with this difficult. Although the District Council agrees that quantifying these emissions would be a best estimation, the implications of decommissioning should form part of the whole life carbon assessment.</p> <ul style="list-style-type: none"> • The District Council acknowledges that the proposed ReWWTP development is designed for a long working life with the ability to adapt and expand in the future. This is positive from a climate resilience perspective, but consideration should be made for quantifying the carbon impact of possible future expansion plans. Although it is assumed that expansion plans would be subject to separate planning applications if and when required, the District 	
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		<p>Council recommends a section should be included within the whole life carbon assessment relating to future development of the site and the potential carbon emissions resulting from this as this may impact on the deliverability of net zero aspirations.</p>	
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4.74.8 Community

4.7.14.8.1 The Community Chapter of the Environmental Statement Chapter 11 (App doc Ref 5.2.11) presents the findings of the Environmental Impact Assessment (EIA) with specific relation to Community. Its purpose is to inform how the surrounding communities may be affected by the relocation of the Cambridge Waste Water Treatment Plant.

4.7.24.8.2 The Assessment of is supported by Volume 3 - Book of Figures Community (App Doc Ref 5.3.11) and Environmental Statement - Volume 4 - Chapter 11 - Appendix 11.1 Community Questionnaire (App Doc Ref 5.4.11.1).

4.7.34.8.3 The Outline Community Liaison Plan (CLP) is provided at (App Doc Ref 7.8) and has been produced as part of the suite of Management Plans created from considering consultation responses.

Table 4.8: Details of the summary and status of agreement on Community

Statement/document on which agreement	AW Comments	SCDC Comments	Status
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is sought.			
<p>The assessment presented in the Environmental Statement Chapter 11 Community (App Doc Ref 5.2.11) including the data gathering methodology, baseline, scope of the assessment and the assessment methodology set out is appropriate.</p>	<p>Agreed</p>	<p>The District Council is generally in agreement with the methodology employed by the Applicant as set out in the Community Chapter of the ES [Doc 5.2.11] [AS-028]. The District Council considers that some of the impacts are beneficial to local communities. However, there are other impacts that will not have a positive impact.</p>	<p>Low</p>
<p>The inclusion and approach adopted by the CLP (App Doc Ref 7.8) is agreed.</p>	<p>Agreed</p>	<p>The District Council supports the inclusion of an on-going Community Liaison Plan as proposed in [Doc Ref 7.8] [AS-132] with the status of this as a live document.</p>	<p>Low</p>
<p><u>Public Rights of Way</u> The extent of the new bridleway and extension of the B1047 (as set out in the DDCO at Schedule 6 Part 2) to include equestrian use needs to be further considered, SCDC consider 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</p>	<p>It is not agreed that it is appropriate to include any further equestrian access within the proposed new Public Rights of way than is currently presented as the new bridleway between Low Fen Drove Way (byway 14) and Station Road as shown coloured purple on sheet 6 f the rights of way plans (App Doc Ref 4.6.6). The inclusion of Equestrian</p>	<p>In respect of the Public Rights of Way the District Council notes that that the extension to the B1047 does not include equestrian use. The District Council considers that if the public benefit of the proposals is to be fully realised, it would be beneficial to include bridleway use as part of this circular route</p>	<p>High</p>

<p>bridge.</p>	<p>access across the existing Horningsea bridge is not considered appropriate for safety reasons.</p> <p><u><i>The applicant proposes to amend the current highway design proposals for the A14 overbridge to provide a bridge parapet on the western side of the bridge that is suitable for use as a shared use facility used by mounted equestrians. The highway design drawings have been amended to show a 1.8m high parapet (the current design replaces the existing 1.1m high parapet with a 1.5m parapet).</i></u></p> <p><u>This is agreed with National Highways, CoCC and the Horningsea Greenway Project team.</u></p>	<p>which would connect to new developments at Marleigh as well as Cambridge.</p>	
<p><u>Recreational Use</u> The impact of additional recreational pressure on the Low Fen Way grassland and hedges County Wildlife site as referenced within the Landscape Ecology and Recreational Management Plan (LERMP) (App Doc Ref) and the effect of further recreational impact from future development should be considered further.</p>	<p>Proposals for the monitoring of any recreational pressure is set out within the draft S106 Agreement. SCDC to review the draft section 106 agreement at (App Doc Ref).</p> <p><u>The Applicant does not consider that the proposed pathways within the LERMP or additional opening of the disused railway line will increase effects on the Stow-cum-Quy Fen area or the County Wildlife site.</u>The</p>	<p>The District Council does not have any objection to this approach.</p>	<p>Medium</p>

	<p>LERMP (App Doc Ref 5.4.8.14) [AS-066] proposes the inclusion of boundary treatment either side of paths within the landscape masterplan area with the intent that these would be effective mitigation against footfall away from defined paths.</p> <p>The Applicant has proposed the creation of a wider partnership group to review how the Applicant can contribute to the strategic contribution of the Cambridge Nature network to provide combined resilience to all future development pressure. The Applicant role and any contribution to the monitoring of recreational pressure would be secured by 106 agreement outside of the requirements already set out in the LERMP.</p>		
Mitigation		The District Council supports the inclusion of an on-going Community Liaison Plan as proposed in [Doc Ref 7.8] [AS-132] with the status of this as a live document	Low
Requirements	The Applicant has set out it's proposals for the provision of cycle	The District Council recommends that cycle parking at the new	low

	parking and facilities within the Design Code (App Doc Ref 7.17) which includes, Cycle facilities should be provided to encourage travel to site via sustainable means, Cycle parking should be covered and secure, Showers and changing facilities should be provided for staff	facility would need to be sufficient to cater for staff requirements and should accord with adopted cycle parking standards. This can be secured by way of DCO requirements.	
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4.84.9 Health

4.8.14.9.1 The Environmental Statement Volume 4, Chapter 12 (App Doc Ref 5.2.11) provides the findings of the Environmental Impact Assessment (EIA) completed in relation to the potential impacts of the Proposed Development on health.

The Assessment is supported by Volume 3 - Book of Figures Health

4.8.24.9.2 The Assessment is supported by Volume – Book of Figures (App Doc Ref 5.3.12) and Appendix 12.1 Health Screening (App Doc Ref 5.4.12.2) and Chapter 12 - Appendix 12.3 Health Evidence Review (App Doc Ref 5.4.12.3).

Table 4.9: Details of the summary and status of agreement on Health

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
<u>Assessment Approach</u> The assessment presented in Environmental Statement Chapter 12 Health (App Doc Ref 5.2.11) including the	Agreed	The District Council agrees with the approach taken by the Applicant to the assessment and the methodology of health	Low

<p>data gathering methodology, geographical study area, baseline, scope of the assessment and the assessment methodology set out is appropriate.</p>		<p>impacts associated with the proposed development as outlined in Chapter 12 of the ES (Health) [Doc.Ref.5.2.12] [APP-044].</p>	
<p><u>Range of Stakeholders</u> SCDC seek further clarity on the acceptance of the range of stakeholder consulted as part of the consultation process.</p>	<p>Review Consultation summary report and/or discuss further</p>	<p>The District Council is not clear from the stakeholder engagement details provided [Doc ref 5.2.11] [REP4-028AS-028] if any proactive engagement was undertaken with the Gypsy, Roma, Traveller (GRT) community. There are 2 sites within close proximity to the site, at Milton and on Fen Road. To ensure this minority ethnic group is adequately represented, the District Council consider that all on going community engagement plans/strategies should involve this cohort. This can be done in collaboration with the GRT Liaison Officer at the District Council.</p> <p>It is acknowledged that whilst the pre application consultation was wide it is noted that the level of</p>	<p>Medium</p>

		<p>response was low [Doc ref 5.2.11] [AS-028]. Therefore, the District Council considers that there needs to be active engagement along the lines suggested to protect the interests of previously identified vulnerable population groups.</p>	
<p>Traffic Monitoring SCDC will continue to review if adequate provision withing the Traffic Management Plans, including the Construction Management Plan has been included to ensure the impact of construction traffic is adequately monitored, including the Community Liaison Plan and that adequate mitigation has been included.</p>	<p>For further review within outline Management Plans within Traffic and Access Technical working group.</p>	<p>In respect of Construction Traffic Management Plan (CTMP) [Appendix 19.7] [Doc ref 5.4.19.7], [REP1-044AS-109] the report states that controls will be put in place to prevent construction traffic from travelling through Horningsea and Fen Ditton.</p> <p>The CMTP also sets out [Section 6.9 of the CTMP] [Doc ref 5.4.19.7], [AS-109] that construction traffic must avoid the AM and PM peak periods as well as school pickup and drop off hours. The District Council therefore requests that the details on how this will be monitored, reported, and enforced, should be</p>	<p>Medium</p>

<p><u>Health and Wellbeing</u></p> <p>The assessment approach and methodology presented within the Health Mental Wellbeing Impact Assessment is appropriate, but clarity is sought as to how this will be further monitored and mitigated and secured within the provisions of the dDCO.</p>	<p>Further Requirement within dDCO sought. For discussion.</p>	<p>provided.</p> <p>In respect of the mental health and wellbeing assessment [Appendix 12.3, App Doc Ref 5.4.12.3] [AS-077], the District Council is satisfied that baseline measurements have been taken (page 13). However, it is noted that any specific reference in Chapter 5.2 for how mitigation would be secured, nor when further assessments would be undertaken to monitor change, have been included. The District Council requires this information to be provided.</p>	<p>Medium</p>
<p><u>Community Liaison Plan</u></p>		<p>The District Council considers that provision needs to be made within the Community Liaison Plan to ensure that effective engagement with vulnerable population groups including the Gypsy, Roma,</p>	

		<p>Traveller (GRT) community is undertaken.</p> <p>The District Council supports the provision of a Community Liaison Plan (CLP) as proposed in [Doc Ref 7.8] [AS-132] to be put in place to proactively inform local communities and stakeholders of any scheduled construction works and the potential duration of those works. Works falling outside of agreed core working hours should be made clear, along with any potential obstruction to PRowS, businesses, facilities and local infrastructure.</p>	
<p><u>Mitigation</u></p>		<p><u>Construction Mitigation</u> The proposed Mitigation measures to be employed during the construction period have been considered by the District Council in the context of effect on public health.</p>	

		<p>Table 2-7 of the ES (Chapter 12: Health) [Doc Ref: 5.2.12] [APP-044] states that during construction there will be a peak of approximately 300 staff employed at the site. To ensure that local jobs are prioritised for local people, the District Council recommends that jobs are advertised locally for the first 2 weeks prior to more national recruitment portals.</p> <p>There should also be opportunities created for students and recent graduates of the Cambridge Regional College to maximise opportunities for apprenticeship roles.</p>	
<p><u>Other Requirements</u></p>	<p><u>The Applicant notes the comments. There is already lighting in place along the Horningsea Road. Any further lighting will be agreed prior to adoption with the CoCC.</u></p>	<p>Lighting along Horningsea Road will be adopted by Local Highways who have their own requirements for adoption.</p>	

		Confirmation that the proposed mitigation has been agreed with Local Highways will clearly be required.	
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4.94.10 Historic Environment

4.9.14.10.1 The Historic Environment of the Environmental Statement (App Doc Ref 5.2.13) reports on the likely impact of the Proposed Development on the Historic Environment. This chapter considers built heritage, archaeological remains and historic landscape.

4.9.24.10.2 The Assessment of impact is set out in the Historic Environment Baseline Assessment at App Doc Ref 5.4.13.1.

4.9.34.10.3 The Assessment is supported by the Gazeteer of Assets (App Doc Ref 5.4.13.2) the Historic Landscape Classification (App Doc Ref 5.4.13.3) and the Historic Environment Impact Assessment tables (App Doc Ref 5.4.13.4).

4.9.44.10.4 The plans and figures in support are set out in the Historic Environment Plans (App Doc Ref 4.17) and the Book of Figures (App Doc Ref 5.3.12).

Table 4.10: Details of the summary and status of agreement on Historic Environment

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
The collation of available heritage data, archaeology and built heritage surveys, setting assessments and geophysical surveys are adequate.	Agreed	SCDC is satisfied with the collation of available heritage data archaeology and built heritage surveys, setting assessments and geophysical surveys are adequate	Low

		as set out in REP1-023.	
The proposed approach to assessing impact upon the historic environment/heritage assets and the historic characterisation exercise and the Archaeological Investigation Strategy is appropriate.	Agreed	The Environmental Statement [Historic Environment Chapter of the ES [REP1-023] identifies a range of impacts on the identified built heritage and historic landscape assets from both temporary and permanent construction. The District Council agrees with the methodology that has been used for the assessment of heritage assets.	Low
The lighting strategy proposed as part of the Environmental Statement is appropriate to mitigate the visual impact on heritage assets.	Agreed	TBC	Low
<u>Classification</u> The impact assessment in respect of Biggin Abbey as a “temporary minor adverse impact” paragraph 4.2.12 (App Doc Ref 5.2.13 Table 2-2)	Not agreed this classification reflects the impact given the period of construction.	The District Council considers that given the period of construction is likely to take up to four years, this assessment does not adequately reflect the level of impact on this Heritage Asset of high heritage value and an impact assessment of <u>temporary moderate adverse effect</u> would better reflect the impact.	High
The operation of the proposed development in the opinion of SCDC		Paragraph 4.2.46 [Doc. Ref.5.2.13] [AS-030] states that alterations to	High

<p>equate to minor/moderate adverse effect not the negligible adverse effect presented.</p>		<p>Horningsea Road will further urbanise the historic route through the landscape and create further severance between Biggin Abbey and the landscape to the east which is assessed to reduce the ability to view the asset's historic connection with the wider agricultural landscape and understand its historical context as a rural retreat. This impact is assessed as minor adverse. It is the view of the District Council that the level of change described in Paragraph 4.2.46 [Doc. Ref. 5.2.13] [AS-030] and its impact on the setting of a high value asset should result in an assessment of moderate adverse impact.</p>	
<p>The overall assessment conclusion that the proposed development will cause less than substantial harm to designated heritage assets is agreed, however the level of adverse effects from the proposed landscape mitigation is greater than expressed in the assessment.</p>	<p>Impact of mitigation proposals not agreed</p>	<p>9The District Council, whilst agreeing that the proposals will cause less than substantial harm considers the level of adverse effects identified through the Applicant's assessments to Baits Bite Lock, HCLA22 and Biggin Abbey to be at the higher end of less than substantial harm. This assessment takes into account the cumulative harm caused by the</p>	<p>High</p>

		proposed development and the harm to the historic agricultural setting of the heritage assets resulting from the proposed landscape mitigation.	
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4.104.11 Landscape and Visual Amenity

4.10.14.11.1 The Landscape and Visual Impact Assessment (LVIA) assesses the potential impacts of the Proposed Development on landscape and visual amenity during construction, operation and decommissioning. The study area for the assessment includes the area largely within 2km of the Scheme Order Limits.

4.10.24.11.2 The Assessment of LVIA is set out in Chapter 15 of the ES (App Doc Ref 5.2.15) and is supported by the LVIA Methodology at Chapter 15 Appendix 15.5 App Doc Ref 5.4.15.5

4.10.34.11.3 The book of supporting figures is produced at 5.3.15.

Table 4.11: Details of the summary and status of agreement on Landscape and Visual Amenity.

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
<u>Assessment Approach</u> The assessment presented in Environmental Statement Chapter 15 (App Doc Ref 5.2.15) including the data gathering methodology, baseline, scope of the assessment and the assessment methodology set out is appropriate.	Agreed	The Applicant has appraised the landscape and applied Landscape Character definitions based on site surveys and desk-based review. The local character areas defined are accepted and found to be generally aligned with the GCLCA notwithstanding that it has not	Low

<p><u>Methodology</u> Clarification is sought on the language used for the assessment. Major, Moderate, Minor and Negligible is identified however the LVIA uses terms, large, moderate, slight and negligible. The methodology refers to guidance documents GLVIA 3rd Edition. The Landscape Institute Technical Guidance note 2/19 Residential Visual Amenity should also be referenced.</p>	<p>To confirm correct terminology and reference to guidance documents for Examination.</p>	<p>been referenced. It should be noted that the language used within the assessment findings is not in accordance with the guidance set out in the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition. Primarily, this is related to the use of the word 'large' in place of 'major' and the use of 'slight' in place of 'minor' throughout. For the purposes of this report, the District Council will assume use of the prescribed terms of major and minor.</p>	<p>Medium</p>
<p><u>Design Approach</u> The design approach and its suitability in the location is not agreed. The implementation and resilience of the landscape solution (including planting on the elevated bund) requires clarification during examination for suitability. Consideration of alternative measures, monitoring and mitigation should the trees and vegetation in the location fail to thrive should be included in the Landscape Ecology and Recreational Management Plan (App Doc Ref 5.4.8.14) including the suitability of the use of the soils excavated from the footprint and pipeline excavations for the elevated bund.</p>	<p>For further review and discussion in Examination.</p>	<p>The landscape design response proposes a significant rotunda feature within the local landscape. It is considered that the circular forms are inconsistent with the Fen Edge/Chalklands character areas and agricultural landscape of the surrounding area and that an alternative earthwork, which retained a more linear form, would have been more aligned with the existing landscape character.</p>	<p>High</p>

		<p>The proposals also rely on tree planting atop the rotunda earthwork to provide significant visual mitigation. However, it is considered that due to the dryness of the local area, tree planting atop an earthwork would struggle to survive without consistent watering throughout their lives, not just at establishment. This approach would therefore require water to be used for irrigation throughout the life of the facility. Tree planting should be focused at the base of the bund, at the edges of the site and in the wider study area, closer to receptors such as at the southern village edge to Horningsea.</p> <p><u>It is considered however that the applicant has provided as much consideration as possible to the planting atop the bund to try to ensure the long-term survival of the plants. Whilst it is impossible to be sure that any combination of maintenance and climate will assure longevity and thriving of the plants, there is little more that can</u></p>	
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		<p><u>be done. It is accepted that the proposals allow for replacement planting in the event of failure, and it is possible to reconsider planting in the case of those events.</u></p>	
		<p>The District Council considers that the following measure should be put forward as DCO requirements in themselves or part of a requirement:</p> <ul style="list-style-type: none"> • Soil strategy plan for the soils on site and for the construction and subsequent planting of the bunds • Wider rides within the woodland blocks around perimeter of the proposal area. • Review and assessment of impacts on the GCLCA within the LVIA • Review and standardisation of language within the LVIA (Major, moderate, minor, negligible) • Clarification of the AFGL/AOD to ensure that heights of the envelope of the proposals are fully understood. • <u>Review and amendment of the LERMP to ensure maintenance of the landscape is able to be actioned with clarity.</u> 	

4.114.12 Air Quality

4.11.14.12.1 The Air Quality chapter of the ES presents the potential impacts of the Proposed Development on air quality during its construction, operational and decommissioning phases.

4.11.24.12.2 The Assessment of Air Quality is set out in 5.2.7 Environmental statement - Volume 2 - Chapter 7 – Air Quality (App Doc Ref 5.2.7) and supporting Air Quality Assessment Method 5.4.7.1 ES Volume 4 Chapter 7 Appendix 7.1 (App Doc Ref 5.4.7.1)

4.11.34.12.3 The supporting figures are provided at 5.3.7 Environmental Statement - Volume 3 - Book of Figures Air Quality

Table 4.12: details the summary and status of agreement on Air Quality

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
<p><u>Assessment Approach</u> The assessment presented in Environmental Statement Volume 2 Chapter 7 Air Quality (App Doc Ref 5.2.7) including the data gathering methodology, baseline, scope of the assessment and the assessment methodology set out is appropriate.</p>	<p>More detailed assessments of the impacts will be undertaken as part of the local impact report. <u>Agreed.</u></p>	<p>In general terms, the District Council is satisfied with the scope, methodology and the conclusions derived from the Air Quality Chapter of the ES [Doc ref 5.2.7][APP-039].</p>	<p>Low</p>
<p>Mitigation</p>		<p><u>Construction Mitigation</u> SCDC note that a number of mitigation measures are embedded into the design, such as the re-use of soil on site (to form the bank) reducing the need for soil disposal and therefore reducing the</p>	

		<p>number of potential HGV movements. However, other mitigation measures, such as dust suppression, will also be adopted as part of the Code of Construction Practice and included within the air quality management plan.</p> <p><u>Operational Mitigation</u> There are no specific operational mitigation measures required although it is noted that any emissions from the potential CHP would be controlled by the medium combustion plant directive or as part of any permit required by the Environment Agency for operation of the WWTP.</p>	
Requirements		An air quality management plan which shall detail how emissions, including dust emissions from construction activities, will be minimised should be produced and condition as part of the DCO.	

4.124.13 Odour

4.12.14.13.1 The Odour chapter of the ES Chapter 18 (App Doc Ref 5.2.18) presents the potential impacts of the Proposed Development from odour on sensitive receptors and the surrounding environment during its construction, operational and decommissioning phases.

4.12.24.13.2 The Assessment of odour impacts and receptors is set out in the ES Volume 4 chapter 18, Odour Impact Assessment (App Doc Ref 5.4.18.2)

4.12.34.13.3 The assessment is supported by the Book of figures ES Volume 3 Chapter 18 (App Doc Ref 5.3.18).

4.12.44.13.4 A Preliminary Odour Management Plan has been produced at ES Volume 4 Chapter 18 Appendix 18.4 (App Doc Ref 5.4.18.4).

Table 4.13: details the summary and status of agreement on Odour

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
<p><u>Assessment Approach</u> The assessment presented in Environmental Statement Volume 2 Chapter 7 Air Quality (App Doc Ref 5.2.7) including the data gathering methodology, baseline, scope of the assessment and the assessment methodology set out is appropriate.</p>	<p>More detailed assessments of the impacts will be undertaken as part of the local impact report</p>	<p>The District Council is in agreement with the scope and methodology of the assessments of odour [Doc. Ref. 5.2.18] [APP-050]. However, it should be noted that the odour contours have been modelled on the assumption that the offensiveness of the odour is considered “moderately offensive” rather than “highly offensive”. This is on the basis on the relevant guidance stated that sewage works, operating under normal conditions, should be considered as such. This appears to be a conservative approach to odour and it is felt that it would be beneficial to consider the odour as “highly offensive” to provide some assurance that identified sensitive receptors are unlikely</p>	

		<p>to be affected.</p> <p>The District Council would welcome further clarification on what is considered “normal conditions” and how often “normal operation” is expected, taking into account climate change is likely to result in drier conditions as well as new sustainable development being designed to use less water, thereby increasing the influent dilution.</p>	
Mitigation		<p><u>Construction Mitigation</u></p> <p>The recommended construction mitigation is greater transparency between the environmental permit which the Applicant will require and the DCO process. Clarity is sought on the commissioning phase and contingency for any overrun of the development of the project.</p> <p>Whilst the proposed mitigation is considered acceptable, clarification is sought on the construction and commissioning phase as to when the site’s Environmental Permit or the DCO provides the primary regulatory framework to</p>	

		<p>regulate the site.</p> <p><u>Operational Mitigation</u> The District Council notes that the Applicant has designed / scoped out as much odour as possible, and it is assumed that the site will have BPM (best practicable means) as part of their environmental permit.</p>	
Requirements		<p>The following requirements should be considered as part of the DCO to protect safeguard the amenities of the surrounding community.</p> <ul style="list-style-type: none"> • Outline Commissioning Plan • Odour modelling / further information would be beneficial to consider concentrated influent. • More detail on water, climate change 	

4.134.14 Lighting

4.13.14.14.1 The Environmental Lighting Impact Assessment (ELIA) has been prepared to assess the potential effects from artificial lighting on sensitive receptors and the surrounding environment for the construction, operation and maintenance phases of the proposed development.

4.13.24.14.2 The Assessment of the impacts of lighting is set out in ES Chapter 15 (App Doc Ref 5.2.15) and is informed by the Lighting Design Strategy is provided at Volume 4 Chapter 2 Appendix 2.5 (App Doc Ref 5.4.2.5) and the Code of Construction Practice (Appendix 2.1 App Doc Ref 5.4.2.1)

Table 4.14: details the summary and status of agreement on Lighting.

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
<p><u>Assessment Approach</u></p> <p>The assessment presented in Environmental Statement Chapter 15 (App Doc Ref 5.2.15) including the data gathering methodology, baseline, scope of the assessment and the assessment methodology set out is appropriate.</p>	<p>More detailed assessments of the impacts will be undertaken as part of the local impact report</p>	<p>SCDC accepts the assessment presented in Environmental Statement Chapter 15 (App Doc Ref 5.2.15) including the data gathering methodology, baseline, scope of the assessment and the assessment methodology set out is appropriate.</p>	<p>Low</p>
<p>Mitigation</p>		<p>The recommended construction mitigation is the specification of glass with a low visible light transmission factor. This would reduce the amount of natural light entering the building, which is an important design consideration for the health and well-being of those using the building. Lastly it is proposed to provide automated shutters and/or blinds (the preferred</p>	<p>Medium</p>

		option) that would be activated when the lights are switched on.	
Requirements		The District Council considers that construction lighting should be monitored through the CEMP. The location, specification and duration of construction should be provided as part of the CEMP to ensure that any potential for light pollution is minimised.	Medium

4.144.15 Noise & Vibration

4.14.14.15.1 Noise and vibration impacts have been assessed during the construction, operation, maintenance and decommissioning phases of the proposed development.

4.14.24.15.2 The Assessment of noise and vibration is set out in ES Chapter 17 (App Doc Ref 5.2.17) together with supporting figures and appendices.

4.14.34.15.3 The Noise and Vibration Guidance Policy is set out in the Environmental Statement Chapter 17 Volume 4 (Ap Doc Ref 5.4.17.1) and the outcomes of the assessment are produced at Environmental Statement Volume 3 Book of Figures Noise and Vibration (App Doc Ref 5.3.17).

4.14.44.15.4 *An outline [noise management plan is provided at as part of the Outline Construction Environmental Management Plan CEMP [App Doc Ref] this is secured in Requirement [] of the draft DCO (App Doc Ref)*

4.14.54.15.5 *The Outline Operational Noise management plan has also been produced to demonstrate how noise and vibration would be managed during the operation of the proposed development. This is secured in Requirement [] of the draft DCO (App Doc Ref).*

Table 4.15: Details the summary and status of agreement on Noise and Vibration

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
<p><u>Assessment Approach</u> The assessment presented in Environmental Statement Volume 2 Chapter 17 Noise and Vibration (App Doc Ref 5.2.17. including the data gathering methodology, baseline, scope of the assessment and the assessment methodology set out is appropriate.</p>	<p>The Approach has been agreed within Technical Working Groups.</p>	<p>The District Council is generally satisfied with the scope, methodology and conclusions derived from the Noise and Vibration Chapter (Chapter 15) of the ES [Doc ref.5.2.17] [AS-036]. The District Council notes that the CEMP makes reference to S.61 consent being sought which should be clarified owing to the potential dual regulation through both the planning and environmental health legislation (section 61).</p>	<p>low</p>
<p><u>Assessment conclusion</u> Subject to the implementation of agreed mitigation measures there will be no likely significant noise and vibration effects during the construction, operation or decommissioning of the proposed development. Xref mitigation section of App Doc Ref 5.2.17</p>	<p>Agreed</p>	<p>The District Council notes that during the operational phase, monitoring of operational noise will be a requirement of the permit issued by the Environment Agency [Doc ref. 5.2.17] [AS-036]. The monitoring parameters, duration, frequency and reporting will be specified in accordance with the permitting requirements. On this basis, the District Council</p>	<p>Low</p>

		considers no further requirements are required.	
<p><u>Construction and Environment Management Plan (CEMP)</u></p> <p>The CEMP refers to consent being sought pursuant to section 61 of the Control of Pollution Act 1961. The preference is to disapply this provision and for the CEMP to provide the regulatory framework to operate.</p> <p>Regular monitoring of any complaints should be dealt with via SCDC Environmental Health Department. Complaints received should be recorded and notified within the Community Liaison Plan or notification mechanism secured through the draft DCO requirements.</p>	<p>Applicant to review CEMP and disapplication of section 61</p> <p>Applicant to review securing mechanism for reporting to SCDC of any complaints. The recommendation is within the Community Liaison Plan</p>	<p>The District Council recommends that the CEMP provides the primary regulatory framework for the developer to operate within rather than utilising the S.61 consent through the Control of Pollution Act 1974.</p>	<p>Low</p>
<p>Mitigation</p>		<p>The District Council notes that some of the proposed mitigation measures are 'embedded' in the design of the proposed development. For example, it is advised that the adjustment of Order Limits to avoid sensitive features, amending the sizing and location of temporary access routes and compounds has allowed for noise impacts on sensitive receptors to be mitigated</p>	<p>Low</p>

		[Doc ref.5.2.17] [AS-036]. The District Council has not identified any additional mitigation measures for the development.	
Requirements		The District Council notes that during the operational phase, monitoring of operational noise will be a requirement of the permit issued by the Environment Agency [Doc ref. 5.2.17] [AS-036]. The monitoring parameters, duration, frequency and reporting will be specified in accordance with the permitting requirements. On this basis, the District Council considers no further requirements are required.	Low

4.154.16 Traffic & Transport

~~4.15.14.16.1~~ The Assessment of traffic and transport is set out in Environmental Chapter 19 (App Doc Ref 5.2.19) together with supporting figures, plans and appendices. The Assessment has considered the effects of the Proposed Development on the local transport infrastructure in year 3 of construction (currently assumed to be 2026) which is the expected peak year of vehicle movements, in Year 4 (assumed to be 2028) for decommissioning of the existing Cambridge WWTP and operation of proposed WWTP in the expected year 1-1 of operation and then for year 1 plus five and ten years (expected to be 2028, 2033 and 2028 respectively).

~~4.15.24.16.2~~ The Assessment is supported by the Book of Figures at App Doc Ref 5.3.19 and the Traffic Regulation Order Plans at App Doc Ref 4.7.

~~4.15.34.16.3~~ In addition a series of management plans have been produced to demonstrate how Traffic and Access would be managed during the construction and operation of the proposed development including; Construction Traffic Management Plan App Doc Ref 5.4.19.7, Operational Workers Travel Plan (App Doc Ref 5.4.19.8) and Construction Workers Travel Plan (App Doc Ref 5.4.19.9).

Table 4.16: Details of the summary and status of agreement on Traffic and Transport

Statement/document on which agreement is sought:	Comments	SCDC Comments	Status
<p><u>Assessment Approach</u> The approach and structure of the Traffic Assessment (Appendix 19.3 App Doc Ref 5.4.19.3) to include; Policy review, baseline transport conditions, collision data analysis, development proposals, trip generation, distribution and assignment, junction capacity modelling and impact assessment and mitigations measures is appropriate.</p>	<p>Agreed</p>		
<p><u>Temporary Road Closures</u> Temporary Road closures in the ownership of SCDC are set out in Schedule 5 of the dDCO Streets to be temporarily closed. Such closures must be mitigated to ensure safe flow across junctions and across links.</p>			
<p><u>Access to works</u></p>	<p>Further review of proposed management</p>		

<p>Access to works across roads in the ownership of SCDC are set out in Schedule 7 of the dDCO Access to works. Effective control of arriving and departing vehicles, particularly HGV's alongside monitoring process for enforcement is required. The mechanism for implementing this process will form part of discussion regarding the management plans.</p>	<p>plans required for agreement.</p>		
<p><u>Assessment of Access options</u> SCDC has raised concerns about the choice of access in comparison with a direct vehicle access from the A14.</p>	<p>Not Agreed</p>		
<p><u>Public Rights of Way</u> Public Rights of way to be temporarily closed for which a substitute is to be provided are set out in Schedule 6 Part 1 of the dDCO. The impact of these closures must be minimized through the CEMP to ensure the safety of users of the rights of way and access to key infrastructure such as the Fen Ditton Primary School.</p>	<p>Further review of draft CEMP to confirm alternatives and mitigation presented is appropriate and agreed.</p>		

Other Matters

4.164.17 Waterbeach New Station Development

4.16.14.17.1 The order limits and the layout of the Waterbeach long pipeline section are set out in the Design Plans (App Doc Ref 4.14).

Table 4.17: Details of the summary and status of agreement on development plan for Waterbeach New Station

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
<p>SCDC is aware of and has been engaged in discussions regarding the development of the Waterbeach New Station and the proposed change to the Order limits to reduce conflict during the installation of the Waterbeach rising mains and the overlap with the CWWTPR order limits and those submitted by SLC Rail, as the design developer of the Waterbeach New Station for and on behalf of the Greater Cambridge Shared Partnership. Ongoing engagement is agreed to manage planning and delivery timings particularly around access.</p>	<p>Review and ongoing engagement</p>	<p>The District Council can confirm it has been engaged in pre-application discussions in respect of Waterbeach WRC over the course of the last year. Details including siting and access have been considered as part of the pre-application discussions. The District Council is now awaiting the application's submission.</p>	<p>Medium</p>

4.174.18 Site Selection – Alternatives

4.17.14.18.1 The Alternatives chapter of the Environmental Statement (Volume 2 Chapter 3 Site Selection and Alternatives) describes the site selection process and the approach undertaken by the Applicant to refine the design of the proposed Cambridge Waste Water Treatment Plant Relocation Project (CWWTPRP) and the alternatives which have been considered as the CWWTPRP has developed. The site selection exercise concluded that there are no alternative sites suitable for the proposed development within the built-up area or outside of the Green Belt.

4.17.24.18.2 It is agreed that the applicant followed a thorough and systematic criteria-based approach to both the initial identification of potential sites and to the final site selection and that this provides robust justification for why areas of search were identified and dismissed or taken forward. The final site selection was also the subject of comprehensive public consultation and engagement.

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status

5 Agreement on this SoCG

5.1.1 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: **South Cambridgeshire District Council**

Date: _____

[add signature for any other parties]

Appendix 1 Summary of Pre-Application engagement.

SoCG ID	Matter	Record of agreement
Engagement Process		
	The parties accept the need for pre-application engagement to minimise risk of abortive or unnecessary pre-application submission work or the need for additional assessment post application submission and are willing to attend Technical Working Groups when available and one to one meetings, if needed.	Technical Working Group 11 March 2021
Agriculture and Soil Resources		
	<u>The Applicant Anglian Water</u> and SCDC agree the need for and the proposed scope of the Agricultural Land Classification and Soil Management Plan and the adequacy of the Land Quality Assessment, Guidance to be followed in assessments to include; land contamination, sensitivity criteria and magnitude of impact.	Biodiversity TWG dated 26 April 2022
	<u>The Applicant Anglian Water</u> and SCDC agree the mitigation measures proposed in the CoCP to ensure works do not cause contamination of soils or impact upon human health.	Environmental Health TWG dated 29 th April 2022
Air Quality		

<p><u>The Applicant Anglian Water</u> and SCDC agree the methodology applied to the Air Quality Assessments, the guidance to be followed in assessments and maximum design scenarios and assessment criteria.</p>	<p>Environmental Health TWG 29th April 2022. [email Kathryn Taylor to Officers 29th April 2022 and follow up e mail dated [24/06/22]</p>
<p>Biodiversity</p>	
<p><u>The Applicant Anglian Water</u> and SCDC agree the approach to the EIA, the proposed Species for detailed ecology surveys for 2021 and scoping assessment, the potential impacts to statutory designated sites and the potential impact to non-statutory designated sites.</p>	<p>Technical Working Group meeting 11 June 2021</p>
<p><u>The Applicant Anglian Water</u> and SCDC agree the methodology and assessments used for the EIA in advance of submission of the EIA scoping report</p>	<p>Technical Working Group 18 August 2021</p>
<p><u>The Applicant Anglian Water</u> and SCDC agree Proposed approach to the PEIR and topics for the Environmental Information Papers</p>	<p>Technical Working Group 18 November 2021</p>
<p><u>The Applicant Anglian Water</u> and SCDC agree what was presented at Consultation Phase 3 and mitigation summary presented in the Preliminary Environmental Information Report and LERMP.</p>	<p>Technical Working Group 3 February 2022</p>
<p><u>The Applicant Anglian Water</u> and SCDC agree that Biodiversity Metric 3.0 will be used to calculate and evidence the Biodiversity Net Gain (“BNG”) requirements for the project. It is also agreed that <u>the Applicant Anglian Water</u> will share the full details of the</p>	<p>Technical Working Group 3 February 2022</p>

calculations including annotative drawings showing the classification, condition and size of each parcel of land for SCDC to assess and comment upon.

~~The Applicant Anglian Water~~ and SCDC agree the commitment to maintain BNG habitats for a minimum of 30 years and accept the Biodiversity Assessment scope.

Technical Working Group 26 April 2022.

~~The Applicant Anglian Water~~ and SCDC agree that a minimum of 20% BNG will be delivered by the project.

~~The Applicant Anglian Water~~ and SCDC agree the mitigation proposals for water voles and badgers and the management through Natural England Licences. the Wildlife Management Plan.

Workshop meeting 14 June 2022.

Carbon

~~The Applicant Anglian Water~~ and SCDC agree the assessment of Carbon presented within the PEIR and how it has been addressed at decommissioning and the wider carbon implications of the project and the link to the North East Cambridge AAP.

Meeting 20th June 2022

Climate Resilience

~~The Applicant Anglian Water~~ and SCDC agree the design and proposals for storm management and that the process are flexible for adaption to climate change.

Technical Water Meeting with SCDC consultants 17th May 2022

~~The Applicant Anglian Water~~ and SCDC agree the need for a detailed Flood Risk Assessment (FRA) to be submitted with the DCO. The assessment will cover the NPA's⁶ requirements and the NPPF⁷ guidance, the design flood standard will be 1:100 and will

⁶ National Planning Statement for Waste Water section 4.4.4 and 4.4.7

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69505/pb13709-waste-water-nps.pdf

⁷ NPPF section 160 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

consider climate change.

Historic Environment

The Applicant Anglian Water and SCDC agree that the collation of available heritage data, archaeology and built heritage surveys, setting assessments and geophysical surveys are adequate. Technical Working Group 7 December 2021

The Applicant Anglian Water and SCDC agree the LVIA viewpoints proposed for Consultation Phase 3 and Zones of Theoretical Visibility (ZTV's)

The Applicant Anglian Water and SCDC agree the proposed approach to assessing impact upon the historic environment/heritage assets and the historic characterisation exercise. Technical Working Group 1 February 2022

The Applicant Anglian Water and SCDC agree the Archaeological Investigation Strategy and approach to PEIR

The Applicant Anglian Water and SCDC agree the lighting strategy proposed as part of the Environmental Statement will mitigate the visual impact on heritage assets. Environmental Health SoCG Meeting 15 June 2022

Landscape and Visual

The Applicant Anglian Water and SCDC agree the mitigations proposed within the Landscape masterplan, CTMP, CoCP adequately minimise the impacts of visual impact during construction. Workshop 15 June 2022

The Applicant Anglian Water and SCDC agree the LERMP responds to the guidelines in the Greater Cambridge Landscape Character Assessment (2021).

Noise and Vibration

The Applicant Anglian Water and SCDC agree the proposed overview of the noise, odour and air assessments in the PEIR as presented in Consultation Phase 3 and the overview of the noise, odour and air impacts mitigation commitments and proposed Community papers.

Technical Working Group
1 February 2022

The Applicant Anglian Water and SCDC agree the guidance to be followed in noise and vibration assessments, maximum design scenarios, assessment criteria, significance construction and operational noise and proposal for Environmental Statement.

The Applicant Anglian Water and SCDC agree the tunnelling and pipeline impacts and assessments and the need for Community Liaison Officer.

Environmental Health
TWG 29th April 2022.
[email Kathryn Taylor to
Officers 29th April 2022
and follow up e mail
dated 24th June 2022]

Odour

The Applicant Anglian Water and SCDC agree the Odour Assessment to be undertaken in accordance with best practice guidance IAQM's *Guidance on the assessment of odour for planning* Version 1.1 – July 2018, Emission rates – as measured at existing WWTW for comparable processes or UK Water Industry Research (UKWIR) Odour Control in Wastewater Treatment emission rates, Mitigation measures considered in line with the NPS Statement for Waste Water and that the objective will be “Negligible” impact at receptors (as defined in IAQM’s guidance)

Technical working
Group 12 May 2021

The Applicant Anglian Water and SCDC agree the assessment methodology for the odour management plan, the guidance to be followed in assessments and the mitigation measures relevant to Odour. Maximum design scenarios and qualitative assessment.

Environmental Health
TWG 29th April 2022.
[email Kathryn Taylor to
Officers 29th April 2022
and follow up e mail
dated [24th June 2022]

PROW

The Applicant Anglian Water and SCD agree that there is unlikely to be an increased impact

PRoW TWG 23rd June

of anti social behaviour as a result of the project and the Environmental Assessment that 2022
 anti social behaviour is likely to diminish.

Recreation

The Applicant ~~Anglian Water~~ and SCDC agree the scope and assessments undertaken to inform the Landscape, Ecological and Recreational Management Plan (LERMP) and the measures set out in the CoCP and CTMP. (scope and assessments agreed but topic remains under discussion)

Traffic and Access

The Applicant ~~Anglian Water~~ and SCDC agree the approach and structure of the Traffic Assessment to include; Policy review, baseline transport conditions, collision data analysis, development proposals, trip generation, distribution and assignment, Junction capacity modelling and impact assessment and mitigations measures. April 2021

The Applicant ~~Anglian Water~~ and SCDC agree the assessment work carried out on the site access options to determine a single option to take forward to the Environmental Impact Assessment and Traffic Assessment. Technical Working Groups
 26 April 2021
 28 May 2021 and
 17 September 2021

The Applicant ~~Anglian Water~~ and SCDC agree the results of the optioneering assessment and junction capacity assessment and assessment proposed to inform final decision on access option. Technical Working Group
 6 October 2021

The Applicant ~~Anglian Water~~ and SCDC agree with the scope of traffic surveys undertaken to inform the traffic Assessment and environmental assessment work together with the Junction capacity Technical Working Group
 22 January 2022

Assessment methodology, and junctions to be assessed.

The Applicant ~~Anglian Water~~ and SCDC agree the update to the Traffic Assessment Scoping note and the scope of the proposed checking surveys. 12 April 2022

The Applicant ~~Anglian Water~~ and SCDC agree the proposed management plans included in the PEIR, CoMP, CTMP, Application of Best Practicable Means (BTM) and the CTMP and CEMP for Consultation Phase 3. Technical Working Group 28 April 2022

Anglian Water and SCDC agree that the TTRO's required for Traffic Management will not be included in the DCO. Meeting 13 May 2022

The Applicant ~~Anglian Water~~ and SCDC agree the scope of the 2021 traffic data checking surveys and Junction assessment summary to inform the Traffic Assessment. Technical Working Group 30 June 2022

Water Resources

The Applicant ~~Anglian Water~~ and SCDC agree the scope and assessment of Hydrological Impact assessment and agree that the risk of contaminant movement through the ground water is unlikely to move through the groundwater at sufficient concentrations or speed to impact any sensitive receptors. Technical Water Meeting 17th May 2022

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**

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/>