

**Cambridge Waste Water Treatment Plant Relocation Project** Anglian Water Services Limited

# Statement of Common Ground: South Cambridgeshire District Council

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## **Document Control**

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#### Version History

Version	Date	Author	Description of change
1	12/7/2022	KT	Changes to section 4
2	27/09/23	КТ	Format and content amendments to reflect the position in the Relevant Representations and Rule 6 Letter dated 19 September 2023
3	20.12.2023	CT/CS	Amended to include comments from
			SCDC on planning sections
4	19.01.2024	-	Updated to include Deadline 4 updated document review and position



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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).
- 1.1.2 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.
- 1.1.3 This SoCG has been prepared by the Applicant 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.
- 1.1.4 To date, SCDC have provided views on draft proposals at different phases of consultation of the design development.
- 1.1.5 In this SoCG, reference to 'the parties' means the Applicant and SCDC.
- 1.1.6 This SoCG has been prepared to identify matters agreed, still in discussion and matters currently outstanding between the parties .

## **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 confirms the pre-application consultation undertaken to date between the Applicant and SCDC.
  - Section 3 identifies the relevant documents on which the agreements recorded in this SoCG were reached.
  - Section 4 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 5 includes the signatures of all parties to confirm their agreement that this SoCG is an accurate record of issues and discussions as at the date of this SoCG.
- 1.2.2 This SoCG relates to the following topics;
  - (i) Strategic 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

#### 1.3 Status of the SoCG

- 1.3.1 This version, Version 2 of the SoCG represents the position between the Applicant and SCDC as of .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.



# 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.



# 4 Summary and Status of Agreement

#### 4.1 Strategic Development Plan Context

#### 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.	<ul> <li>For over 20 years the existing CWWTP site and surrounding area has been promoted through consecutive statutory planning policy documents for redevelopment, to 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.</li> <li>As set out in the LIR (para 6.5), a document capturing the</li> </ul>	
		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.	
		This confirms the series of development plans that have sought to redevelop the CWWTP and surrounding land as an	



Statement/document on	AW Comments	SCDC Comments	Status
which agreement is sought.         Extant Development Plan         Context for the existing         CWWTP site	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.	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 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. 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 SS/4 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.	
Emerging Development Plan Co	ntext		L
Proposed Submission North East Cambridge Area Action Plan (NECAAP)	See Planning Statement [REP1-049] paragraphs 2.3.12 to 2.3.20.	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.	



Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
Emerging Greater Cambridge Local Plan (GCLP)	See Planning Statement [REP1-049] paragraphs 2.3.21 to 2.3.36.	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 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	
Implications of Water Supply, including for Plan timetables	See Planning Statement [REP1-049] paragraph 2.3.30 to 2.3.36.	GCLP. See LIR paras 6.50-6.63 and 6.72-6.77.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.	



Statement/document on	AW Comments	SCDC Comments	Status
which agreement is sought.			
Extent to which housing needs could be met without the relocation of the CWWTP	See Planning Statement [REP1-049] Section 2.1 and Applicant's Comments on South Cambridgeshire District Council Deadline 2 submission [REP-XXX] 2.3.1, page 64.	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 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	
Progressing the emerging Devel	onmont Plans	identified. See LIR paras 6.78-6.82.	
Housing Trajectory on the CWWTP site in the emerging NECAAP and Local Plan	The draft NEECAAP makes provision for the NEC to accommodate 8,350 new homes, 15,000 new jobs, and the provision of 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.	The housing trajectory in the Proposed Submission draft of the NECAAP indicates 1,900 homes coming forward on the Applicant The Applicant 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.	
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.	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	



Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
Degree of certainty for redevelopment of existing CWWTP site	See Planning Statement [REP1-049] paragraph 2.3.12 to 2.3.36.	<ul> <li>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.</li> <li>The Applicant 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 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</li> </ul>	
What could be achieved in North East Cambridge if the CWWTP remains in situ	If the CWWTP were to remain in its existing         location, the full NEC development would not be         delivered and therefore, fewer homes and jobs         would be created.         See Planning Statement [REP1-049] paragraph         2.3.20.	LIR paras 6.95-6.97. 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 lab space. See LIR paras 6.34-6.35 and 6.98-6.101.	



Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
Relationship between the ReWWTP DCO and the emerging development plans	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. See Planning Statement [REP1-049] paragraphs 2.3.12 to 2.3.36.	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, 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.	
Weight to be given to emerging 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	A key part of the emerging development 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. See Planning Statement [REP1-049] paragraphs 2.3.12 to 2.3.36.	While the Councils appreciate that the 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	



Statement/document on	AW Comments	SCDC Comments	Status
which agreement is sought.			
		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 in	
		Greater Cambridge for housing and employment	
		development. See LIR para 6.107-6.110.	
Significance of North East	NEC is a key strategic site in the Cambridgeshire	The provision of 8,350 net additional homes would make a	
Cambridge to the Cambridge	area. It is a highly sustainable location and the	substantial contribution towards meeting Greater	
Economy	relocation of the WWTP will provide the	Cambridge's housing needs to 2041 and well beyond and	
	opportunity for 8,350 homes to be delivered	would support the continue economic growth of the area and	
	alongside the creation of 15,000 new jobs, and	Greater Cambridge. The location of the existing CWWTP and	
	provision of various community, cultural, and	surrounding area is in a key strategic location adjacent to	
	open space facilities in NEC.	Cambridge Science Park, a leading location for the technology	
	See Planning Statement [REP1-049] Sections 1.1,	sector, one of the key sectors in the nationally significant	
	2.1 and 2.2.	Cambridge economy. See LIR paras 6.111-6.112.	
Government's Cambridge	Through the relocation of the WWTP, there will	Government's Cambridge 2040 initiative recognises the	
2040 initiative	be an opportunity to develop the land it currently	significance of the Cambridge economy and in respect of NEC	
	occupies for the NEC.	is seeking to accelerate the relocation of the WWRP (subject	
	See Planning Statement [REP1-049] Sections 1.1,	to planning permission), and unlock an entire new City	
	2.1 and 2.2.	quarter. See LIR paras 6.113-6.115.	
Benefits arising from vacation	A number of benefits will be provided.	There is clear evidence through the emerging plan making	
of the existing WWTP site	See Section 4.2 and Table 4.3 below, and	processes in respect of the NECAAP and GCLP of the	
	Planning Statement [REP1-049] Sections 2.1 and	significant planning benefits that would be enabled by the	
	2.2.	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

 Table 4.2: Details of the summary and status of agreement.



Statement/document on which agreement is sought.	AW Comments	SCDC Comment	Status
Planning Benefits	<ul> <li>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.</li> <li>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 -</li> <li>5,500 new homes</li> <li>23,500 m2 new business space</li> <li>13,600 m2 new shops local services, community, indoor sports and cultural facilities</li> <li>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)</li> <li>On the surrounding area -</li> <li>2,850 new homes</li> <li>105,000 m2 new business space</li> <li>5,000 m2 re-provided business floorspace</li> <li>5,000 m2 re-provided industrial, storage and distribution space (B2 and B8)</li> <li>Partial retention of existing commercial floorspace</li> </ul>	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.	



Statement/document on which agreement is sought.	AW Comments	SCDC Comment	Status
Environmental Benefits	<ul> <li>Environmental benefits through the delivery of a new modern, low carbon waste water treatment facility:</li> <li>significantly reducing carbon emissions (from being operationally net zero and energy neutral)</li> <li>improving storm resilience (by making storm overflows and CSOs less likely to occur)</li> <li>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)</li> <li>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)</li> <li>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)</li> <li>substantially reducing the number of homes and properties which may potentially experience odour<sup>1</sup> (when compared to the equivalent area for the Proposed Development)</li> <li>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.</li> </ul>		

<sup>&</sup>lt;sup>1</sup> 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
Social Benefits	<ul> <li>Social benefits through:</li> <li>improving access to the countryside (by the delivery of new paths and accessible open spaces)</li> <li>enhancing education (through the facilities provided in the Discovery Centre and increased access to the WWTP)</li> <li>enhancing recreational opportunities (formalising recreational access and providing wider connectivity through new and enhanced public rights of way)</li> <li>The provision towards new recreational space and enhanced public rights of the development, would also be available to everyone in the local area.</li> <li>These are social benefits of the scheme which we consider should</li> </ul>		
Economic Benefits	<ul> <li>carry moderate weight.</li> <li>Economic benefits through: <ul> <li>investment in construction and related employment for its duration</li> <li>increasing operational employment</li> <li>supporting planned population growth and urbanisation in Waterbeach (in water treatment terms)</li> <li>increasing operational resilience and flexibility to accommodate population growth projections plus an allowance for climate change into the 2080s in accordance with the Applicant'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 20232 to 'supercharge' Cambridge as Europe's science capital.</li> </ul> </li> </ul>		
Operational Benefits			
Other Benefits			



## 4.3 Green Belt

#### 4.3.1 Table 4.3: Details of the summary and status of agreement on Green Belt

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
Planning Statement: Green Belt Assessment (App Doc Ref 7.5.3).	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. 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.	SCDC's position in respect of Green Belt is set out in the LIR	
Compliance with National and Local Policy	<ul> <li>The Green Belt purposes as set out in the NPPF are:</li> <li>a) to check the unrestricted sprawl of large built-up areas;</li> <li>b) to prevent neighbouring towns merging into one another;</li> <li>c) to assist in safeguarding the countryside from encroachment;</li> </ul>	SCDC's position in respect of policy compliance is set out in our LIR	

<sup>&</sup>lt;sup>2</sup> <u>https://www.gov.uk/government/news/long-term-plan-for-housing</u>

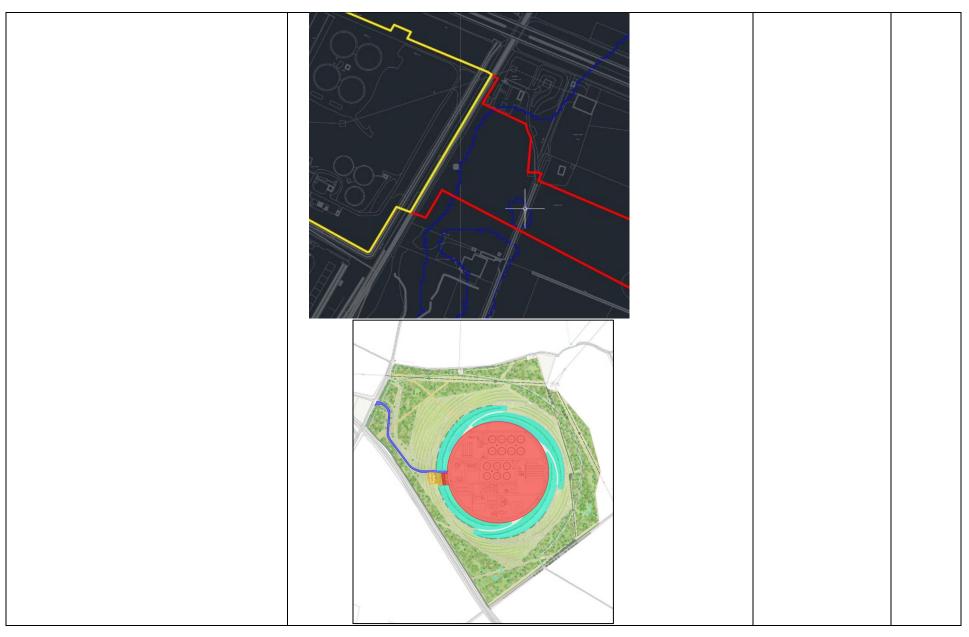


	<u> </u>	
d) to preserve the setting and special character of historic towns; and		
e) to assist in urban regeneration, by encouraging the recycling of		
derelict and other urban land		
Developments 2, 20 of the order to d Courth Courth index shine Local Disc costs out		
Paragraph 2.30 of the adopted 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;		
<ul> <li>Maintain and enhance the quality of its setting; and</li> </ul>		
<ul> <li>Prevent communities in the environs of Cambridge from merging</li> </ul>		
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 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:		
<ul> <li>The pipeline and connection infrastructure</li> </ul>		
<ul> <li>The discharging point substantially underground</li> </ul>		
<ul> <li>Access road (and small surface level car park)</li> </ul>		
The proposed W/W/TD and surrounding earth bank (as a substantial		
The proposed WWTP and surrounding earth bank (as a substantial structure in its own right) do not fall within the overantions set out at NPPE		
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 200		
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		



bound	of Bannold Road totaling 48.1 hectares is outside the Green Belt dary. The remaining 160.9 hectares is within the Cambridge Green The Proposed Development within this area is broken down as vs:	
	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	129.4 160.9ha	







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.	

- 4.3.2 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.
- 4.3.3 The harms after mitigation arising from the Proposed Development (and the weight we consider should to be given to them) are:

Harms	Comment	AW Weight	SCDC Comments
Water Quality, Resources and Flood Risk	• 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	Weighting is not for SCDC as an interested party but for the ExA
Biodiversity	Temporary harm on habitats (4.6.16)	Moderate	Weighting is not for SCDC as an interested party but for the ExA
Landscape and Visual Amenity	<ul> <li>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</li> <li>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)</li> </ul>	Moderate	Weighting is not for SCDC as an interested party but for the ExA
Land Use	<ul> <li>Harm to farm businesses (4.8.8)</li> <li>Loss of BMV agricultural land (4.8.8)</li> </ul>	Minor	Weighting is not for SCDC as an interested party but for the ExA
Green Belt (consistent with NPSWW para 4.8.18 and NPPF para 148)	<ul> <li>The Proposal Development is inappropriate development in the Green Belt, which is harmful by definition (4.8.38). In addition there would be:</li> <li>Harm to the openness of the Green Belt - Moderate (4.8.41)</li> <li>Harm to the purposes of including land in the Green Belt - Moderate (4.8.41)</li> </ul>	Substantial	Weighting is not for SCDC as an interested party but for the ExA



Designated Heritage	• Indirect harm to the setting of Biggin Abbey (Grade II* listed)(4.10.13-	Less than	Weighting is not for SCDC as an
Assets	4.10.14)	Substantial	interested party but for the ExA
	<ul> <li>Indirect harm to Baits Bite Lock Conservation Area and Poplar Hall (4.10.20)</li> </ul>		
	Harm from the partial or complete removal of archaeological remains		
Non-designated Heritage	Indirect harm to non-designated heritage assets (4.10.20)	Less than	Weighting is not for SCDC as an
Assets (4.10.20)		Substantial	interested party but for the ExA
Socio Economic	Harm to navigation on the River Cam (4.13.7)	Minor	Weighting is not for SCDC as an
			interested party but for the ExA

4.3.4 The benefits arising from the Proposed Development (and the weight we consider should to 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	Weighting is not for SCDC as an interested party But (BB the EXA
Odour	Reducing the number of homes and properties within an area potentially affected by odour (6.2.13)	Moderate	Weighting is not for SCDC as an interested party but for the ExA
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	Weighting is not for SCDC as an interested party but for the ExA
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	Weighting is not for SCDC as an interested party but for the ExA
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) Supporting forms of sustainable development	Substantial	Weighting is not for SCDC as an interested party but for the ExA
Socio Economic	Direct economic benefits of the CWWTPR development supporting a prosperous economy (4.13.7) Maximising public value and supporting the circular economy (2.2.17), including encouraging the optimum use of public transport and green travel infrastructure Enhancing education (2.2.17 and 4.13.13)	Substantial	Weighting is not for SCDC as an interested party but for the ExA



	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) Indirect social benefits from the delivery of new schools, jobs, local services, community and other facilities and increased access to green spaces		
Carbon	Environmental benefits of significantly reducing carbon emissions (2.2.17 and 4.14.5)	Moderate	Weighting is not for SCDC as an interested party but for the ExA

#### 4.4 Biodiversity

- 4.4.1 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)
- 4.4.2 The Biodiversity Net Gain Assessment is set out in App Doc Ref 5.4.8.13 [AS-163].
- 4.4.3 The Habitats Regulation Assessment is provided at App Doc Ref 5.4.8.16. [REP2-024].

#### Table 4.4: Details of the summary and status of agreement on Biodiversity

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
Assessment Approach	Agreed.	SCDC is satisfied with the biodiversity methodology	Low
The assessment presented in ES Chapter 8 Biodiversity App Doc Ref		as set out in the Biodiversity Chapter of the ES [REP2	
5.2.8 [REP2-007] including the data gathering methodology,		-007]	
baseline, scope of the assessment and the assessment			
methodology set out is appropriate.			
Biodiversity Net Gain (BNG)	Agreed	SCDC is satisfied with the biodiversity net gain	Low
The BNG report at App Doc Ref 5.4.8.13 and the outcome of the		assessment as set out in the ES Volume 4 Chapter 8	
calculations for the measures habitat, hedgerow and river is		Appendix 8.13 BNG Assessment Report [REP2-020]	
appropriate.			



River Units	The Applicant has updated	A legal agreement will be required where the land	Medium
The calculation of the biodiversity net gain and how this will be	ES Appendix 8.13	used to provide the BNG offset is outside the order	Wiedidini
secured in the dDCO requires further assessment.	Biodiversity Net Gain (BNG)	limits of the DCO through either (a) \$106 will be	
secured in the abco requires fulther assessment.	Report (App Doc Ref	between the Landowner and the local planning	
	5.4.8.13 and submitted at		
		authority (likely to be Cambridgeshire County	
	Deadline 4 to reflect the	Council), or (b) Conservation Covenant with a	
	inclusion of Requirement	responsible body.	
	25 within the dDCO (App		
	Doc Ref 2.1).		
	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 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.		
	The Applicant is continuing		
	to explore off-site river unit		
	opportunities. A record of		
	the outcome of further		
		1	



	discussions with off-site opportunities will be set out at Deadline 6.	
Further details and comments on	For review and further	Medium
Biodiversity Chapter 8 (App Doc Ref 5.2.8) Table 2-8	discussion.	
Appendix 8.4 Ornithology Baseline Technical Appendix, Appendix	Documents submitted and	
8.8 Badger Technical Appendix	shared with SCDC.	
Preliminary Ecological Appraisal		

#### 4.5 Climate Resilience

- 4.5.1 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).
- 4.5.2 The Assessment of the parameters of the climate assessment is presented from a sustainable construction point of view.

#### Table 4.5: Details of the summary and status of agreement on Climate Resilience

Statement/document on which agreement is sought.	<b>AW Comments</b>	SCDC Comments	Status
The assessment presented in Environmental Statement Climate Resilience	Agreed	The District Council has assessed the possible	Low
Chapter [Doc. Ref. 5.2.9] [APP-041] identifies the parameters of the climate		impacts identified in the Climate Resilience	
assessment from a sustainable construction point of view in accordance		Chapter of the ES [Doc. Ref. 5.2.9] [APP-041] from	
with		a sustainable construction view (rather than a	
the use of the Institute of Environmental Management and Assessment		flooding or drainage), and therefore the District	
(IEMA EIA Guide to Climate Change Resilience and adaptation 2020 and		Council's comments focus on the receptor	
IEMA methodology for in combination climate impacts (ICCC).		identified as physical infrastructure.	
Mitigation Measures	Agreed	The District Council notes that weather resilience	Low
The mitigation proposed within App Doc Ref 5.2.9 at para 2.8 are agreed.		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	
Secondary Mitigation Measures focus on management plans and the	Detailed	The District Council notes that weather resilience	Medium
monitoring of impacts and management of impacts during the operational	Construction	measures for the construction phase have been	
phase. These management plans should be secured either by way of a	Environment	outlined in Chapter 9 of the ES [Doc. Ref. 2.8.25]	
requirement or within a section 106 Agreement.	Management	and it is important that these follow through into	
	Plans (CEMP) to	a Construction Environmental Management Plan	
	be prepared to	(CEMP) as the proposed development progresses	
	align with the		
	requirements of		
	the Code of		
	Construction		
	Practice (CoCP)		
	Part A (App Doc		
	Ref 5.4.2.1)		
	secured under		
	Requirement 9		
Other requirements	The Applicant	The District Council acknowledges that the focus	
	has submitted a	of the ES is very much on the development of the	
	Design Code at	operational structures of the wastewater	
	Deadline 4 to	treatment facilities, however it is important to	
	demonstrate	ensure high standards for employee and other	
	specifically for	populated buildings.	
	the attainment		
	of BREEAM	The District Council therefore considers that the	
	excellent	following should be secured through	
	The Design	requirements or be included in a single	
	Code (App Doc	management plan to be sought through a	
	Ref 7.17) is now	requirement relating to sustainable construction	
	submitted for	measures:	
	SCDC to provide	Optimum layout and orientation	
	any further	Optimum fabric performance	
	comment.	Optimum use of the cooling hierarchy	



#### 4.6 Carbon

- 4.6.1 This chapter presents the findings of an Environmental Impact Assessment (EIA) completed in relation to the potential carbon emissions generated by the Proposed Development.
- 4.6.2 The Assessment is set out in the Environmental Statement Chapter 10 (App Doc Ref 5.2.10).
- 4.6.3 An Outline is provided at Carbon Management Plan 5.4.10.2
- 4.6.4 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 4.6: 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 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.	Agreed	The District Council is broadly satisfied with the approach to assessing carbon emissions and the use of the Institute of Environmental Management and Assessment (IEMA) EIA Guide to Assessing Greenhouse Gas Emissions and their significance (2022).	Low
<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.	Review in conjunction with Strategic Carbon Assessment. (App Doc Ref 7.5.2).	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. It is noted that construction, operational and decommissioning activities would generate in excess of 104tCO2e over its lifetime. The	Medium



		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 71,480tCO2e, which clearly demonstrates the carbon emissions benefits of the proposed development preferred option (DCO).	
		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.	
		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	
Mitigation The securing of adequate mitigation measures to ensure future carbon reductions through later design stages and onsite construction activities is sought.	Review in conjunction with Carbon Management Plan App Doc Ref 5.4.10.2 and Requirement 21 of the dDCO.	data.Construction Mitigation -The District Council notes that the assessment demonstrates that carbon emissions from construction activities can be reduced by 48% when comparing the DM0 (Delivery Milestone Zero) baseline	Medium



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:	
<ul> <li>Continued innovation review;</li> </ul>	
<ul> <li>Material specification, requiring low</li> </ul>	
carbon intensity materials; and	
Efficient construction	
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 2.1) [Doc ref. 5.4.2.1, APP-068]	
and the whole life carbon assessment is	
updated as this detail becomes available.	
Operational Mitigation	
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.	
pilotovoltaic array.	



	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.	
	The District Council notes that mitigation will	
	be controlled through the DCO and that	
	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.	
Requirements	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 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.	
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 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.	



## 4.7 Community

- 4.7.1 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.
- 4.7.2 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).
- 4.7.3 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 4.7: Details of the summary and status of agreement on Community

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
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.	Agreed	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.	Low
The inclusion and approach adopted by the CLP (App Doc Ref 7.8) is agreed.	Agreed	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
Public Rights of Way 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	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	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	High



the new circular route proposed to include equestrian access across the non-motorised user section of the Horningsea bridge.	shown coloured purple on sheet 6 f the rights of way plans (App Doc Ref 4.6.6). The inclusion of Equestrian access across the existing Horningsea bridge is not considered appropriate for safety reasons.	as part of this circular route which would connect to new developments at Marleigh as well as Cambridge.	
	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). This is agreed with National Highways, CoCC and the Horningsea Greenway Project team.		
Recreational Use 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.	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. The 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. The Applicant has proposed the creation	The District Council does not have any objection to this approach.	Medium



	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.		
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 in its proposals for the provision of cycle 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	The District Council recommends that cycle parking at the new 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.	low

#### 4.8 Health

- 4.8.1 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.
- 4.8.2 The Assessment is supported by Volume 3 Book of Figures Health



4.8.3 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 4.8: Details of the summary and status of agreement on Health

AW Comments	SCDC Comments	Status
Agreed	taken by the Applicant to the assessment and the methodology of health impacts associated with the proposed development as outlined in Chapter 12 of the ES (Health) [Doc.Ref.5.2.12] [APP-044].	
Review Consultation summary report and/or discuss further	The District Council is not clear from the stakeholder engagement details provided [Doc ref 5.2.11] [REP4-028] 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. It is acknowledged that whilst the pre application consultation was wide it is noted	Medium
	Agreed Review Consultation summary	AgreedThe District Council agrees with the approach taken by the Applicant to the assessment and the methodology of health impacts associated with the proposed development as outlined in Chapter 12 of the ES (Health) [Doc.Ref.5.2.12] [APP-044].Review Consultation summary report and/or discuss furtherThe District Council is not clear from the stakeholder engagement details provided [Doc ref 5.2.11] [REP4-028] 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.



		active engagement along the lines suggested to protect the interests of previously identified unperceble population groups	
<u>Traffic Monitoring</u> 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.	For further review within outline Management Plans within Traffic and Access Technical working group.	identified vulnerable population groups.In respect of Construction TrafficManagement Plan (CTMP) [Appendix 19.7][Doc ref 5.4.19.7], [AS-109] the report statesthat controls will be put in place to preventconstruction traffic from travelling throughHorningsea and Fen Ditton.The CMTP also sets out [Section 6.9 of theCTMP] [Doc ref 5.4.19.7], [AS-109] thatconstruction traffic must avoid the AM andPM peak periods as well as school pickup anddrop off hours. The District Council thereforerequests that the details on how this will be	Medium
		monitored, reported, and enforced, should be provided.	
Health and Wellbeing 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.	Further Requirement within dDCO sought. For discussion.	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.	Medium
Community Liaison Plan		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, Traveller	
		(GRT) community is undertaken.	
		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.	
Mitigation		Construction Mitigation	
		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.	
		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.	
		There should also be opportunities created for	
		students and recent graduates of the	
		Cambridge Regional College to maximise	
		opportunities for apprenticeship roles.	
Other Requirements	The Applicant notes the	Lighting along Horningsea Road will be	
	comments. There is already	adopted by Local Highways who have their	



lighting in place along the	own requirements for adoption. Confirmation	
Horningsea Road. Any further	that the proposed mitigation has been agreed	
lighting will be agreed prior to	with Local Highways will clearly be required.	
adoption with the CoCC.	, , , , , , , , , , , , , , , , , , ,	

## 4.9 Historic Environment

- 4.9.1 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.
- 4.9.2 The Assessment of impact is set out in the Historic Environment Baseline Assessment at App Doc Ref 5.4.13.1.
- 4.9.3 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).
- 4.9.4 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 4.9: 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 as set out in REP1-023.	Low
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</u> <u>adverse</u> effect would better reflect the impact.	High
The operation of the proposed development in the opinion of SCDC equate to minor/moderate adverse effect not the negligible adverse effect presented.		Paragraph 4.2.46 [Doc. Ref.5.2.13] [AS-030] states that alterations to 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.	High
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.	Impact of mitigation proposals not agreed	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 proposed development and the harm to the historic agricultural setting of the heritage assets resulting from the proposed landscape mitigation.	High



## 4.10 Landscape and Visual Amenity

- 4.10.1 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.
- 4.10.2 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
- 4.10.3 The book of supporting figures is produced at 5.3.15.

#### Table 4.10: 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
Assessment Approach	Agreed	The Applicant has appraised the	Low
The assessment presented in Environmental Statement		landscape and applied Landscape	
Chapter 15 (App Doc		Character definitions based on site	
Ref 5.2.15) including the data gathering methodology,		surveys and desk-based review. The	
baseline, scope of the		local character areas defined are	
assessment and the assessment methodology set out is		accepted and found to be generally	
appropriate.		aligned with the GCLCA	
		notwithstanding that it has not been	
		referenced.	
<u>Methodology</u>	To confirm correct terminology and	It should be noted that the language	Medium
Clarification is sought on the language used for the	reference to guidance documents	used within the assessment findings is	
assessment. Major, Moderate, Minor and Negligible is	for Examination.	not in accordance with the guidance	
identified however the LVIA uses terms, large,		set out in the Guidelines for	
moderate, slight and negligible.		Landscape and Visual Impact	
The methodology refers to guidance documents GLVIA		Assessment, 3rd Edition. Primarily,	
3 <sup>rd</sup> Edition. The Landscape Institute Technical Guidance		this is related to the use of the word	
note 2/19 Residential Visual Amenity should also be		'large' in place of 'major' and the use	
referenced.		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.	
Design Approach 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.	For further review and discussion in Examination.	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 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.	High
		<ul> <li>The District Council considers that the following measure should be put forward as DCO requirements in themselves or part of a requirement:</li> <li>Soil strategy plan for the soils on site and for the construction and subsequent planting of the bunds</li> <li>Wider rides within the woodland blocks around perimeter of the proposal area.</li> <li>Review and assessment of impacts on the GCLCA within the LVIA</li> <li>Review and standardisation of language within the LVIA (Major, moderate, minor, negligible)</li> </ul>	



Clarification of the AFGL/AOD to     ensure that heights of the     envelope of the proposals are     fully understood.
<ul> <li>Review and amendment of the LERMP to ensure maintenance of the landscape is able to be actioned with clarity.</li> </ul>

## 4.11 Air Quality

- 4.11.1 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.
- 4.11.2 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)
- 4.11.3 The supporting figures are provided at 5.3.7 Environmental Statement Volume 3 Book of Figures Air Quality

### Table 4.11: details the summary and status of agreement on Air Quality

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
Assessment Approach 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.	Agreed.	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].	Low
Mitigation		Construction Mitigation	



	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 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.	
	Operational Mitigation	
	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.	
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.	

# **4.12 Odour**

4.12.1 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.



- 4.12.2 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)
- 4.12.3 The assessment is supported by the Book of figures ES Volume 3 Chapter 18 (App Doc Ref 5.3.18).
- 4.12.4 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 4.12: details the summary and status of agreement on Odour

Statement/document on which	AW Comments	SCDC Comments	Status
agreement is sought.			
Assessment Approach The assessment presented in	More detailed assessments of the impacts will be	The District Council is in agreement with the	
Environmental Statement Volume 2	undertaken as part of the local impact report	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	
Chapter 7 Air Quality (App Doc Ref 5.2.7) including the data gathering		been modelled on the assumption that the	
		offensiveness of the odour is considered	
methodology, baseline, scope of the assessment and the assessment			
		"moderately offensive" rather than "highly offensive". This is on the basis on the relevant	
methodology set out is appropriate.			
		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 to be affected.	
		are unikely to be affected.	
		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.	



Mitigation	Construction Mitigation
	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.
	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 regulate the site.
	Operational Mitigation
	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
De su incas este	their environmental permit.
Requirements	The following requirements should be
	considered as part of the DCO to protect
	safeguard the amenities of the surrounding
	community.
	Outline Commissioning Plan
	Odour modelling / further information
	would be beneficial to consider
	concentrated influent.
	More detail on water, climate change



# 4.13 Lighting

- 4.13.1 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.
- 4.13.2 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 4.13: details the summary and status of agreement on Lighting.

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
Assessment Approach	More detailed assessments of the impacts will be	SCDC accepts the assessment presented in Environmental Statement Chapter 15 (App Doc Ref 5.2.15) including the	Low
The assessment presented in Environmental	undertaken as part of the	data gathering methodology, baseline, scope of the	
Statement Chapter 15 (App Doc	local impact report	assessment and the assessment methodology set out is	
Ref 5.2.15) including the data gathering methodology,		appropriate.	
baseline, scope of the			
assessment and the assessment methodology set out			
is appropriate.			
Mitigation		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 option) that would be activated when the lights are switched on.	Medium
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



## 4.14 Noise & Vibration

- 4.14.1 Noise and vibration impacts have been assessed during the construction, operation, maintenance and decommissioning phases of the proposed development.
- 4.14.2 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.
- 4.14.3 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).
- 4.14.4 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 )
- 4.14.5 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 4.14: Details the summary and status of agreement on Noise and Vibration

Statement/document on which agreement is sought.	AW Comments	SCDC Comments	Status
Assessment Approach	The Approach has been agreed	The District Council is generally satisfied	low
The assessment presented in Environmental Statement	within Technical Working Groups.	with the scope, methodology and	
Volume 2 Chapter 17 Noise and Vibration (App Doc Ref		conclusions derived from the Noise and	
5.2.17. including the data gathering methodology,		Vibration Chapter (Chapter 15) of the ES	
baseline, scope of the assessment and the assessment		[Doc ref.5.2.17] [AS-036]. The District	
methodology set out is appropriate.		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).	
Assessment conclusion	Agreed	The District Council notes that during	Low
Subject to the implementation of agreed mitigation		the operational phase, monitoring of	
measures there will be no likely significant noise and		operational noise will be a requirement	
vibration effects during the construction, operation or		of the permit issued by the	



decommissioning of the proposed development. Xref mitigation section of App Doc Ref 5.2.17		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.	
Construction and Environment Management Plan (CEMP) 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. Regular monitoring of any complaints should be dealt with via SCDC Environmental Health Department. Complaints received should be recrded and notified within the Community Liaison Plan or notification mechanism secured through the draft DCO requirements.	Applicant to review CEMP and disapplication of section 61 Applicant to review securing mechanism for reporting to SCDC of any complaints. The recommendation is within the Community Liaison Plan	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.	Low
Mitigation		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 [Doc ref.5.2.17] [AS-036]. The District Council has not identified any additional mitigation measures for the development.	Low
Requirements		The District Council notes that during	Low



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.	

## 4.15 Waterbeach New Station Development

4.15.1 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 4.3: 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
SCDC is aware of and has been engaged in discussions	Review and ongoing	The District Council can confirm it has been	Medium
regarding the development of the Waterbeach New Station	engagement	engaged in pre-application discussions in	
and the proposed change to the Order limits to reduce conflict		respect of Waterbeach WRC over the course	
during the installation of the Waterbeach rising mains and the		of the last year. Details including siting and	
overlap with the CWWTPR order limits and those submitted		access have been considered as part of the	
by SLC Rail, as the design developer of the Waterbeach New		pre-application discussions. The District	
Station for and on behalf of the Greater Cambridge Shared		Council is now awaiting the application's	
Partnership. Ongoing engagement is agreed to manage		submission.	
planning and delivery timings particularly around access.			

## 4.16 Site Selection – Alternatives

4.16.1 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.

4.16.2 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.



# **5** Agreement on this SoCG

5.1.1 This Statement of Common Ground has been jointly agreed by:

Name:	
Signature:	
Position:	
On behalf of: Date:	Anglian Water Services Limited
Name:	
Signature:	
Position:	
On behalf of:	South Cambridgeshire District Council
Date:	
-	

[add signature for any other parties]



# **Appendix 1 Summary of Pre-Application engagement.**

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 TWGs when available and one to one meetings, if needed. =	TWG 11 March 2021
Agriculture and Soil Resources	
The Applicant 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	Biodiversity TWG dated 26 April 2022
assessments to include; land contamination, sensitivity criteria and magnitude of impact.	Environmental Health TWG dated 29
The Applicant and SCDC agree the mitigation measures proposed in the CoCP to ensure works do not cause contamination of soils or impact upon human health.	April 2022
Air Quality	
The Applicant 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.	Environmental Health TWG 29 April 2022. [email Kathryn Taylor to Officers 29 April 2022 and follow up e mail dated [24/06/22]
Biodiversity	
The Applicant 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.	TWG meeting 11 June 2021
The Applicant and SCDC agree the methodology and assessments used for the EIA in advance of submission of the EIA scoping report	TWG 18 August 2021
The Applicant and SCDC agree Proposed approach to the PEIR and topics for the Environmental Information Papers	TWG 18 November 2021
The Applicant and SCDC agree what was presented at Consultation Phase 3 and mitigation summary presented in the Preliminary Environmental Information Report and LERMP.	TWG 3 February 2022



The Applicant 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 the Applicant will share the full details of the calculations including annotative drawings showing the classification, condition and size of each parcel of land for SCDC to assess and comment upon.	TWG 3 February 2022
The Applicant and SCDC agree the commitment to maintain BNG habitats for a minimum of 30 years and accept the Biodiversity Assessment scope. The Applicant and SCDC agree that a minimum of 20% BNG will be delivered by the project.	TWG 26 April 2022.
The Applicant 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 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	Meeting 20 June 2022
East Cambridge AAP. Climate Resilience	
The Applicant 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 17 May 2022
The Applicant and SCDC agree the need for a detailed Flood Risk Assessment (FRA) to be submitted with the DCO. The assessment will cover the NPA's <sup>3</sup> requirements and the NPPF <sup>4</sup> guidance, the design flood standard will be 1:100 and will consider climate change.	
Historic Environment	
The Applicant and SCDC agree that the collation of available heritage data, archaeology and built heritage surveys, setting assessments and geophysical surveys are adequate. The Applicant and SCDC agree the LVIA viewpoints proposed for Consultation Phase 3 and Zones of Theoretical Visibility (ZTV's)	TWG 7 December 2021
The Applicant and SCDC agree the proposed approach to assessing impact upon the historic environment/heritage assets and the historic characterisation exercise. The Applicant and SCDC agree the Archaeological Investigation Strategy and approach to PEIR	TWG 1 February 2022

 $<sup>^{\</sup>rm 3}$  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 <sup>4</sup> NPPF section 160 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/1005759/NPPF\_July\_2021.pdf



The Applicant 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 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 and SCDC agree the LERMP responds to the guidelines in the Greater Cambridge Landscape	
Character Assessment (2021).	
Noise and Vibration	
The Applicant 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.	TWG 1 February 2022
The Applicant and SCDC agree the guidance to be followed in noise and vibration assessments, maximum	Environmental Health TWG 29 April
design scenarios, assessment criteria, significance construction and operational noise and proposal for	2022. [email Kathryn Taylor to
Environmental Statement. The Applicant and SCDC agree the tunnelling and pipeline impacts and	Officers 29 April 2022 and follow up e mail
assessments and the need for Community Liaison Officer.	dated 24 June 2022 ]
Odour	
he Applicant and SCDC agree the Odour Assessment to be undertaken in accordance with best practice	
guidance IAQM's <i>Guidance on the assessment of odour for planning</i> Version 1.1 – July 2018, Emission rates – as measured at existing WWTW for comparable processes or UK Water Industry Research (UKWIR) Odour	TWG 12 May 2021
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)	
The Applicant and SCDC agree the assessment methodology for the odour management plan, the guidance	Environmental Health TWG 29 April
to be followed in assessments and the mitigation measures relevant to Odour. Maximum design scenarios	2022. [email Kathryn Taylor to
and qualitative assessment.	Officers 29 April 2022 and follow up email
and qualitative assessment.	Officers 29 April 2022 and follow up email dated [ 24 June 2022 ]
PROW	
· · · · · · · · · · · · · · · · · · ·	dated [ 24 June 2022 ]
PROW	dated [ 24 June 2022 ]
PROW The Applicant and SCD agree that there is unlikely to be an increased impact of anti-social behaviour as a	dated [ 24 June 2022 ]



The Applicant 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 and SCDC agree the approach and structure of the Traffic Assessment to include; Policy	April 2021
review, baseline transport conditions, collision data analysis, development proposals, trip generation,	
distribution and assignment, Junction capacity modelling and impact assessment and mitigations	
measures.	
The Applicant and SCDC agree the assessment work carried out on the site access options to determine a	TWG 26 April 2021
single option to take forward to the Environmental Impact Assessment and Traffic Assessment.	28 May 2021 and
	17 September 2021
The Applicant and SCDC agree the results of the optioneering assessment and junction capacity assessment	TWG 6 October 2021
and assessment proposed to inform final decision on access option.	
The Applicant and SCDC agree with the scope of traffic surveys undertaken to inform the traffic Assessment	TWG 22 January 2022
and environmental assessment work together with the Junction capacity	
Assessment methodology, and junctions to be assessed.	
The Applicant and SCDC agree the update to the Traffic Assessment Scoping note and the scope of the	12 April 2022
proposed checking surveys.	
The Applicant and SCDC agree the proposed management plans included in the PEIR, CoMP, CTMP,	TWG 28 April 2022
Application of Best Practicable Means (BTM) and the CTMP and CEMP for Consultation Phase 3.	
Anglian Water and SCDC agree that the TTRO's required for Traffic Management will not be included in the	Meeting 13 May 2022
DCO.	
The Applicant and SCDC agree the scope of the 2021 traffic data checking surveys and Junction assessment	TWG 30 June 2022
summary to inform the Traffic Assessment.	
Water Resources	
The Applicant and SCDC agree the scope and assessment of Hydrological Impact assessment and agree	Technical Water Meeting 17 May 2022
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.	



# 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/

